



01. INTRODUCTION

Introduction

- 1.1.1.** The Local Plan sets out the Council's statutory planning policy framework for the Borough. This plan sets out the level of growth which needs to be planned for in Merton and identifies where that growth should be located and how it should be delivered. The policies set out in the plan will be used to determine planning applications in the borough. The Local Plan must be read as a whole document. The placement of the topic chapters and the policies within the chapters is no reflection on their importance or weight – it does not stand for a hierarchy.
- 1.1.2.** The Local Plan covers a range of matters including the number of new homes and employment provision needed and where they should be located. It also sets out policies for the protection and enhancement of the natural and historic environment, the provision of supporting infrastructure for growth and other policies to manage change in local areas including town centres, industrial areas neighbourhoods and the borough generally.
- 1.1.3.** This plan will be used to promote, shape and manage growth in Merton for the next 15 years. Policies in the plan set out how the Council will seek to achieve an appropriate balance between physical, social, economic and environmental protection in Merton for the benefit of all residents and stakeholders.

Together with the London Plan and the South London Waste Plan (once they are adopted), the Local Plan will form the Statutory Development Plan under section 38 of the 2004 Planning and Compulsory Purchase Act.

National Policy

- 1.1.4.** Local Plans must be consistent with the national policy set out within the [National Planning Policy Framework \(NPPF\)](#). The NPPF sets out the principles and objectives that are required to underpin approaches to plan-making and development management. Central to this, within the NPPF is the “presumption in favour of sustainable development” that establishes in general terms that:
- Local Plans should positively seek to meet the development needs of their area and meet objectively assessed needs (such as housing growth) unless the harm of doing so would demonstrably conflict with the NPPF itself; and
 - Decision-taking should see that proposals that accord with development plans are approved without delay, and where plans are silent or out-of-date on an issue, permission should be granted for development.
- 1.1.5.** In accordance with the NPPF (para 20), the key strategic priorities for the local plan must address include the following:

- a. Housing (including affordable housing), employment, retail, leisure and other commercial development.
- b. Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).
- c. Community facilities (such as health, education and cultural infrastructure); and
- d. Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

1.1.6. [The London Plan](#) 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. Within, the London Plan, the Mayor sets out designations, planning policy requirements, targets and instructions; boroughs must include in their Local Plans.

1.1.7. The Local Plan must also be in ‘general conformity’ with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG). The Mayor of London produces other strategies to sit alongside the London Plan.

1.1.8. The fore mentioned statutory planning documents set out what mitigation measures are needed and if, any assessment(s) is needed to assess the potential impact such as environmental of a proposed development. Therefore it is not necessary to have the same policy at local level.

Neighbourhood Plans

1.1.9. Neighbourhood Plans are plans prepared by the community which set out the detailed planning policies and proposals for their specific area. Policies and proposals within Neighbourhood Plans must be in general conformity with the local plan.

1.1.10. At the time of writing (June 2021) the council’s public consultation has just been completed on PlanWimbledon’s proposal to form a neighbourhood forum for their proposed neighbourhood area of Wimbledon. More information can be found on Merton’s website: [Neighbourhood plans \(merton.gov.uk\)](https://www.merton.gov.uk/planning-and-building-control/neighbourhood-plans)

Merton Local Plan contents

Strategic Objectives: guided by consultation feedback, Merton's Sustainable Community Strategy (known as the Community Plan) and the London Plan 2021

- 1.1.11. **Strategic policies** are borough-wide policies, which set out Merton Council's strategy to work with local people, businesses and key stakeholders to improve neighbourhoods and create new opportunities for the future.
- 1.1.12. **Development policies** gives further detail that is needed to deliver the strategic policies.
- 1.1.13. **Site allocations:** Site allocations sets out land use requirements for sites that will contribute to the borough's growth.
- 1.1.14. **Policies Map:** The Policies Map shows planning designations where specific planning policies are applied.
- 1.1.15. Merton produces an Authority Monitoring Report (AMR) every year that analyses how our planning policies are performing. [Local Plan \(merton.gov.uk\)](https://www.merton.gov.uk) Once this Local Plan is adopted the AMR will monitor the new policies.

[Should Cabinet and Merton Council approve the Local Plan for submission to the Secretary of State, details of the pre-submission publication, including dates and how to contact the council, will be provided]



02. GOOD GROWTH

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Good Growth

The London Plan seeks to promote ‘good growth’ in London by building strong inclusive communities, making the best use of land, creating a healthy city, building more homes and affordable housing to address the housing crisis, growing and maintaining a strong economy, increasing efficiency and resilience by moving towards a net-zero carbon city by 2050 and adapting to the impacts of climate change.

Dealing with such a level of growth is undoubtedly a huge challenge, putting pressure on land, housing, infrastructure and the environment. It also comes as we are facing other unprecedented challenges: Brexit, Coronavirus (COVID-19), its impact and the following recovery, air pollution, climate change and entrenched inequality.

The local plan seeks to ensure that Merton’s future growth is planned in a sustainable way in accordance with the London Plan Good Growth principles. This includes maintaining a good balance between economic, social and environmental objectives, creating liveable attractive places for people to live, study, work and visit, as well as delivering our ambition of becoming a net-zero carbon borough by 2050, and creating resilient and adaptive environments, in response to the Climate Emergency for the benefit of all in Merton.

Ensuring we plan and support predicted population growth, increase demand for affordable homes, the impacts of the Covid-19 pandemic – its impact on people especially in deprived areas and COVID recovery and the need to enable job creation. Delivering development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

It is imperative that future growth in Merton must be **socially** and **economically inclusive** and **environmentally sustainable** and, contribute to the London Plan Good Growth Objectives.

- GG1 Building strong and inclusive communities.
- GG2 Making the best use of land.
- GG3 Creating a healthy city.
- GG4 Delivering the homes Londoners need.
- GG5 Growing a good economy.
- GG6 Increasing efficiency and resilience.

All development proposals in Merton, large or small, must accord with all relevant policies of this Local Plan and all other documents such as [Supplementary Planning Documents \(SPDs\)](#) which, make up Merton’s Statutory Development Plan.

The Sustainable Development Goals (SDGs) and London

[The UN Sustainable Development Goals \(SDGs\)](#) set ambitious targets to create transformative *social, economic* and *environmental* improvements by 2030. They provide an integrated framework covering a comprehensive range of issues – jobs, housing, inequalities, healthcare, the environment and more supported by targets and performance indicators. The SDGs were agreed unanimously in 2015 by the UN’s 193 member states, including the UK (United Kingdom), within ‘Agenda 2030’ – a landmark UN Resolution on achieving sustainable development. The London Sustainable Development Commission (LSDC) was established in 2002 to provide independent advice to the Mayor of London on ways to make London a sustainable, world-class city.



[In March 2021, the London Sustainable Development Commission](#) published a progress report on how far London has come to meeting the SDGs. We will continue to work with and support the London Sustainable Development Commission on achieving the SDGs. Cities and local governments, businesses, the public sector, communities and others – and coordinated local action on the SDGs has indeed been gathering momentum in recent years. According to the UK Government, 65% of the SDGs rely on local level implementation. For the first time, the impacts and opportunities of cities and towns have been recognised in the SDGs by countries and the United Nations. This has resulted in a global goal entirely dedicated to urban areas in the form of SDG (Sustainable Development Goals) 11: Sustainable Cities and Communities.

As acknowledged by the Royal Town Planning Institute (RTPI), planning has a key role to play in the successful implementation of the SDGs because of the profession's aim to work in the wider public interest and the overall purpose of the UK planning systems to achieve sustainable development. The goals provide an opportunity to strengthen commitment to plan for sustainable development. Merton will continue to work with the Mayor of London and partners in achieving the SDG's for London.

Growth in Merton

All growth in Merton is expected to be **socially** and **economically inclusive** and **environmentally sustainable** and contribute to the London Plan Good Growth Objectives.

The effects of growth will be considered, ensuring that any significant impact is avoided, or necessary mitigation measures employed. Delivering high quality, sustainable and resilient places through good design and effective master planning and/or Neighbourhood Plans will be essential for future growth in Merton.

Stakeholders and partner organisations

Responsibility for the successful implementation of the policies and delivering growth in Merton falls not only upon the council in its role as Local Planning Authority but, also upon our partners and other stakeholders, including neighbouring boroughs, the Greater London Authority (GLA) and other public and private sector organisations, especially on strategic matters. We will work with community groups and organisations, Merton's diverse communities (faith and ethnicity), disability groups, children and young people to deliver growth, as well as healthy and sustainable neighbourhoods.

Landowners and developers will be important partners in the regeneration and growth of the borough. Much of the land in the growth area are held by private landowners and their commitment and active involvement for the growth in the borough is needed. We will continue to engage with landowners to support the delivery of this Local Plan.

We will consider joint development schemes with private landowners or developers holding adjacent or nearby sites which could involve joint ventures to deliver new homes, community uses and business spaces.

Merton Council's pro-active planning approach to delivering sustainable growth will be supported by several planning documents and detailed guidance, where appropriate for example:

- Local Plan documents.
- Supplementary Planning documents (SPDs).
- Opportunity Area Planning Frameworks (OAPFs) and Development Briefs.

More detail on planning frameworks can be found in the relevant sections of the Local Plan and more detail on the schedule can be found within Merton's [Local Development Scheme](#)

Coronavirus pandemic (COVID-19)

Growth will need to positively contribute to Merton's COVID-19 recovery. The pandemic has accelerated changes in shopping habits, provision for homes especially affordable, jobs and training and, behavioural changes in lifestyles and travel. Therefore, it is important that recovery and growth are sustainable, and do not simply rebuild existing systems that drive inequalities or harm our environment.

Our health inequality gap is growing; this trend was known before the Covid –19 however, the pandemic has increased it and highlighted the issues across the UK. Residents suffering from poor health in Merton are concentrated in our deprived wards mainly in the east. Addressing these inequalities and improving Merton's health and wellbeing, both physical and mental, goes beyond improving access to medical facilities and includes a range of measures to improve our social and physical environment.

Climate change

We must face up to the reality of the Climate Emergency and the need to limit Merton's contribution to this major global problem. Tackling climate change and its consequences is one of the priorities for the local plan. The challenge for planning is, providing much needed homes and jobs in a way that does not have a detrimental impact on our climate and environment.

Merton is already experiencing the impacts of climate change with an increase in the frequency and severity of extreme weather events including extended periods of hot weather and drought, and extreme rainfall and flooding events. Climate change already affects the way we do things and will continue to do so as the scale of global warming increases. New developments will therefore need to prioritise sustainable design and construction to mitigate and adapt to the impacts of climate change, with energy-efficiency, low carbon energy generation, and climate resilience on an equal footing with aesthetic appeal. Ensuring developments are energy efficient and adaptable to the impacts of climate change, making it cheaper to run and more comfortable to be in, will benefit all especially people with lower incomes and in deprived areas.

The move away from petrol and diesel cars towards greener alternatives needs be made easier with more electric vehicle charging points, dockless bikes/scooter hire, cycle parking and facilities, in and around our town centres and surrounding areas. The transition to more sustainable modes of travel will help improve our air quality, considerably reduce noise pollution, and improve the health and wellbeing of people who live and work in Merton and visit the borough.

Delivering growth means prioritising climate change in all planning decisions. Several local plan policies both directly and indirectly address climate change mitigation and adaptation, including our climate change, flooding, air quality, design, green infrastructure, health and wellbeing and transport policies. These policies are supported by a number of strategies including Merton's [Climate Strategy and Action Plan](#) (2020), [Green Infrastructure Study 2020](#), [Air Quality Action Plan](#) and Strategic Flood Risk Assessment.

Healthier and greener environments

Making Merton a healthier and greener borough as well as a fairer one is important. It is why, health inequalities cannot be seen in isolation. Our health inequality gap is growing; this trend was known before the Covid –19 however, the pandemic has increased it and highlighted the issues across the UK. Growth in Merton will need to addressing inequalities both income and health.

Making walking and cycling the default choice of travel is essential. Making it easier and safer, is important for both physical and mental health but, it also contributes to the local economy, relieves stress on the National Health Service (NHS) and helps to tackle climate change.

Merton's green infrastructure and heritage assets not only provide recreational opportunities and improve mental health; but also contribute to the character and attractiveness of Merton. The creation of a network of green spaces and other green infrastructure such as street trees, provides multiple benefits for biodiversity, nature, recreation, climate change resilience and health and wellbeing. Protecting and enhancing our green infrastructure will help our residents to lead healthier, more active lives and provide access to nature which is good for mental health.

Our heritage assets and historic environment are irreplaceable and an essential part of what makes Merton a vibrant borough and their effective management is a fundamental. The historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the local economy, culture and our quality of life.

Design must consider safety and security, layout and orientation, public realm, social inclusion and environmental health impacts such as noise and air quality to ensure we are creating healthy neighbourhoods, which are accessible for all. The potential harmful effects to human health such as, loss of daylight and sunlight, loss of privacy, loss of outlook, overcrowding, isolation, exposure to odours, noise and vibration – must be consider in design.

All development, be it housing, commercial or infrastructure must be designed and delivered in a way that contributes to nature and our heritage assets, not its decline.

Delivering growth means prioritising health and wellbeing in all planning decisions, including

through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.

Healthy and green approaches are embedded into a number of local plan policies both direct and indirectly for example design, health and wellbeing, transport and green and blue infrastructure policies. Supported by a number of Merton's strategies for example: Green Infrastructure Study 2020, [Joint Strategic Needs Strategy](#) and [Borough Character Study 2021](#).

The Mayor will be developing a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth. Merton Council supports this approach and will work with local communities, the Mayor and partners to protect and enhance our rich heritage.

More homes and jobs

The growth in population and jobs has not been matched by the growth in the number and type of homes Merton needs. The cost of renting and house prices to levels that have priced many out of the market. Merton's expected growth and development is shaped by the decisions that are by Merton's planning committee and planners. Every individual decision to provide affordable housing helps to make the housing market fairer, reduce overcrowding and homelessness. Securing more homes is a priority, especially genuinely affordable homes which meet the actual needs of our diverse communities.

A large portion of residents before the pandemic travelled out of the borough to work. The pandemic has changed our work patterns and trends, but as we come out of lockdown people will begin to travel out of borough to work again. It is not known if the levels will be the same as before the pandemic. However, alongside this, it is important that Merton residents, particularly those from disadvantaged backgrounds, fully benefit from the diverse range of opportunities economic growth brings. Removing barriers to local employment can improve resident's life chances, help support local business growth.

We will therefore use the opportunities offered by new development, in both the construction and operational phases, to improve residents' access to skills, training and employment. This will include seeking financial contributions towards employment, education and skills initiatives, and on larger schemes, requiring apprenticeships and job placements in accordance with targets set out in an agreed Employment and Skills Plan. Securing job placements within the end use of a development, rather than solely in the construction phase will be important to ensure residents fully benefit in the long term from the diverse opportunities economic growth brings.

Delivering growth means setting the conditions to deliver more homes, supporting business, providing opportunities for more jobs, employment and training. A number of local plan policies

both direct and indirectly for example housing, economy, design, health and wellbeing and transport. This is supported by a number of Merton's strategies such as Green Infrastructure Study 2020, [Joint Strategic Needs Strategy](#), and Merton's emerging housing delivery strategy.

Supporting infrastructure

Ensuring we have the infrastructure and services to meet the needs of our growing and aging population such as transport, utilities, broadband, education and health. Delivering growth means ensuring we have the right infrastructure to meet our needs for now and in the future. Careful planning together with our partners and stakeholders will make Merton, more efficient and more resilient, preparing it for the future.

The right infrastructure is also needed to help businesses succeed, grow and remain in Merton. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening new markets and allowing more flexible working.

An [Infrastructure Delivery Plan \(IDP\)](#) has been prepared alongside the Local Plan; this is a 'live' document. It sets out the borough's key infrastructure requirements, anticipated costs and expected delivery based upon partnership working with stake holder and utilities providers throughout the Local Plan process. The IDP will be monitored and reviewed on a regular basis to reflect the current circumstances and to inform the development management process. The Infrastructure Schedule contained in the IDP sets out an overview of the key infrastructure requirements necessary to support regeneration in the borough.

A number of planning policies (both direct and indirectly) – for example green and blue infrastructure, design, health and wellbeing and transport. Supported by a number of Merton's strategies and plans for example the IDP.

Making the most of our limited land

We will promote and ensure the most efficient use of land and development while also looking to improve the quality of our environment, protect the amenity of occupiers, neighbours and meet planning aims. It is important that development delivers not only homes, but also the infrastructure to support the new homes, employment and business spaces which create resilient and sustainable communities.

Applying a design-led approach to determine the optimum development capacity of sites is essential to improve the quality of our environment (physical and natural), protect the amenity of occupiers, neighbours and meet planning aims.

Density and mix uses

We will expect high quality developments with higher densities, where appropriate, that can appropriately be delivered by the efficient use of land, particularly in neighbourhoods with good accessible public transport and in Merton's Opportunity Area. In accordance with the London Plan neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the boroughs acute housing needs.

The provision of a suitable mix of uses, can contribute to successfully promoting growth in Merton and importantly, make better use of our limited land. A mix of uses can:

- Increase the provision of much needed homes including those that are genuinely affordable.
- Promote healthy and active neighbourhoods that have a range of activities that are used throughout the day such as entertainment, culture and restaurants.
- Increasing safety and security.
- Reduce the need to travel, reducing the need for some journeys, helping to cut congestion in the borough and improve air quality.

Taller buildings are one form of high-density development that can be right in some locations, subject to excellent design, good public transport accessibility, impact on existing character, heritage and townscape. The architectural quality and materials will need to be of an exemplary standard to ensure that the appearance and architectural integrity of the building is kept through its lifespan.

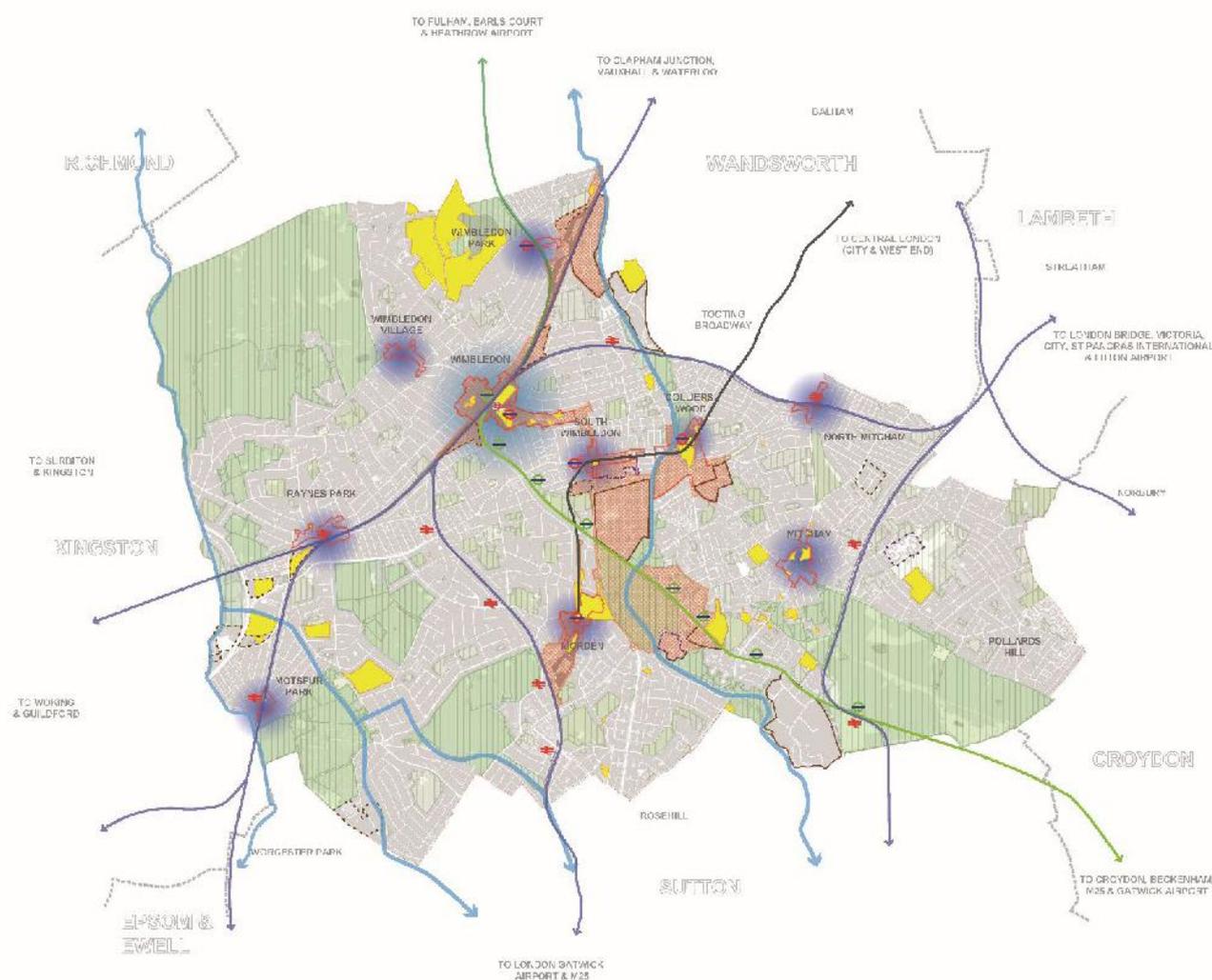
Identifying Merton's Growth areas

A considerable proportion of Merton's growth up to 2036 and beyond is expected to be delivered in the Opportunity Area (OA). The OA is designated in the [London Plan](#) (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA, has agreed that Morden can be included in Merton's OA.

OAs are identified as significant locations with development ability to deliver new housing, commercial development and infrastructure. The town centres found in the OA are suitable for large-scale development and significant increases in jobs and homes as they have particularly good public transport and transport interchanges for example, Wimbledon town centre. Each

centre will make contribute in ways suitable to their location, centre designation and its character.

A clear focus on delivery will require all stakeholders to work together to unlock sites and drive the right sort of development. The council’s overall spatial strategy is illustrated in the Figure below. This shows the broad locations of Merton’s growth area. Development will still take place outside of the OA, although not at the same scale. Outside the OA, smaller scale development and more incremental change will take place. The following sections provides further detail on the parts of the borough where the most significant growth is expected to take place and the role our centre will play in Merton’s growth.



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National Rail Stations	Town Centre Boundaries
Underground Stations	Major Centre
Tram Stops	Town Centre
Railway	Strategic Industrial Locations
Northern Line Underground	Locally Significant Industrial Sites
District Line Underground	Estate Regeneration
Tram Line	Opportunity Area Planning Frameworks
Rivers	Open Space
Other Borough Boundaries	Metropolitan Open Land

Figure: Spatial Strategy

Opportunity Area (OA)

The London Plan ambition for Merton’s OA, is to deliver 5000 new homes and 6000 jobs (indicative figure up to 2041). It should be noted that these figures form the starting point from which we can carry out more precise local level exploration of what can be achieved in terms of the OA’s ability to accommodate growth. Importantly, the ambition for the OA is not, predicated on the delivery of Crossrail 2. It is anticipated that Crossrail 2 will be operational in the 2040s. Merton’s OA is shown in the Figure below.

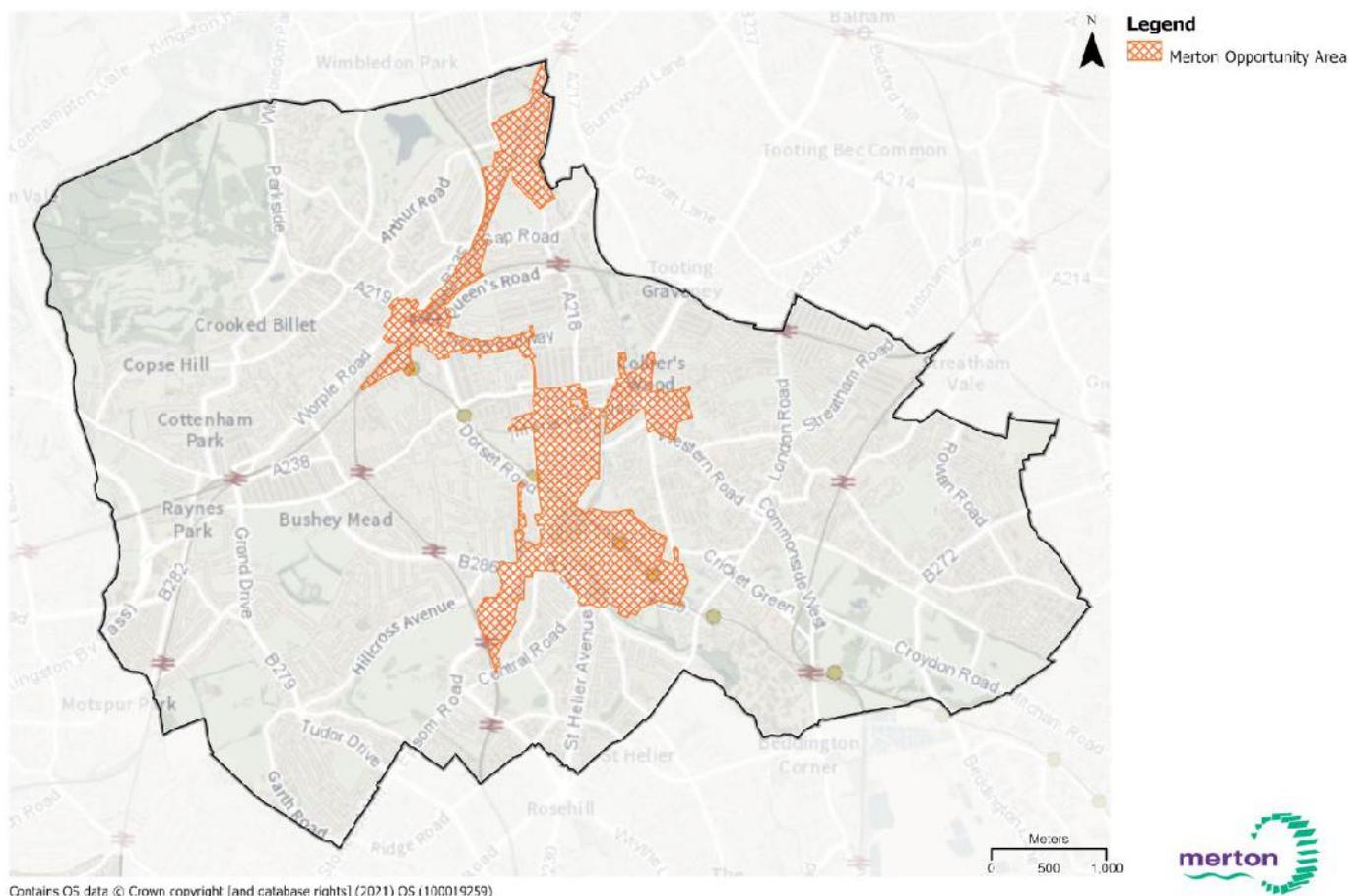


Figure: Opportunity Area

To ensure that the OA fully realise its growth and regeneration potential the Council will produce an Opportunity Area Planning Frameworks (OAPFs) in accordance with London Plan policy *SD1 Opportunity Areas*. This plan-led approach, outlining delivery of affordable housing, create mixed and inclusive communities and ensure the OA will contribute to regeneration objectives to tackle spatial inequalities and environmental, economic and social barriers that affect the lives of all.

The OAPF will be prepared in a collaborative way with Merton diverse communities (including children and young people, Black, Asian and other ethnic minority groups, businesses and

stakeholders). The key priorities for an OA, as outlined in the London Plan are to:

- Maximise the delivery of affordable housing and create mixed and inclusive communities.
- Contribute to regeneration objectives by tackling inequalities and environmental, economic and social barriers that affect the lives of people in the area.
- Facilitates ambitious transport mode share targets.

Wimbledon

Wimbledon designated a Major town centre and classified as a centre for high residential and commercial growth in the London Plan (London Plan Table A1.1 - Town Centre Network). Therefore, Wimbledon will be expected to continue, to secure the development of high quality and attractive, development schemes. Wimbledon will become a safe and healthy place (including at night), providing a balance of mix of uses, delivering new homes including affordable, provision for flexible workspaces/hubs and offices to meet changing work patterns following the pandemic and create and secure employment and skill training opportunities. In addition:

- Maintain and create public space and greening (including appropriate tree and shrub planting) of the street environment:
 - to improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Provide the highest quality that preserves local amenity, enhance and conserve Wimbledon rich heritage assets, character and appearance of place.
- Through town centre management initiatives, the Council will endeavour to ensure that the night- time economy is managed in a way that benefits residents, visitors and businesses working with local communities and stakeholders.
- Maximise opportunities to enable walking and cycling with improved network of safe and attractive greener places and routes.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Work with construction sites to minimise and improve air quality and noise pollution.

- Encourage and enable travel behavioural changes by providing electric car charging points, more cycle parking facilities and improve road safety for all. Working with communities, TfL, GLA and other stakeholders to create a safe network for walking and cycling.
- Work with LoveWimbledon Business Improvement District and the Wimbledon Village Business Association to support the economic recovery, encourage business resilience and promote both local business and the area as a business location.
- Working with Network Rail and Transport for London - on the plans for Crossrail2 to ensure it maximises the benefits for Wimbledon, Raynes Park, Wimbledon Chase and Motspur Park.

Colliers Wood

Colliers Wood town centre is designated as a Distract Centre and classified 'Medium' for commercial growth and 'high' for residential growth in the London Plan (London Plan Table A1.1 - Town Centre Network). Colliers Wood neighbourhood will build on its diverse mix of communities and culture, local and independent shops, small businesses and its rich heritage. In addition:

- Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment and community uses.
- Maintain public space and greening (including appropriate tree and shrub planting) of the street environment:
 - to improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Enable travel behavioural changes by providing electric car charging points and cycle parking facilities. Enable more pedestrian and cycle movement, routes and choices - making walking and 'way-finding' easier for all.
- Provide sustainable and safe design of the highest quality that respects the character and heritage assets including the town centre. Working in partnership with cultural, historical and heritage organisations to promote the history of Colliers Wood - its historical links at Merton

Priory and industrial heritage of William Morris and the Wandle Trail.

- Significant increase in the number of jobs and training provided in the area. - Provide employment space for identified growth sectors and small to medium enterprises and start-ups and contribute towards training and apprenticeship opportunities.
- The Council will continue to work with Transport for London (TfL), to improve roads in the borough and, including Colliers Wood. We will seek external funding to improve safety and movement around the town centre and other busy street in the neighbourhood to improve and increase more walking and cycling, with the aim to improve air quality and improve the health of all.

South Wimbledon

South Wimbledon will become a vibrant, attractive and thriving new local centre that builds on its location between Colliers Wood and Wimbledon. Growth in this neighbourhood will need to contribute to improving the deprivation found here. In addition:

- Make more efficient and use of land, taking opportunities to provide a mix of uses, including new homes (especially affordable homes) and affordable and flexible employment floor space.
- Enable and creating the development of a '20 minutes' neighbourhood'.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Create opportunities for jobs and training for all by supporting for local businesses and new enterprises opportunities.
- Promote its local identity and links to its history and environment thorough design and layout having regard to established local character.
- Enhanced and improve connectivity and public realm, with more active frontages along Merton High Street.

Morden

Morden is designated as a District centre and classified as low for commercial growth and high for residential growth in the London Plan (London Plan Table A1.1 - Town Centre Network). The Morden Regeneration Zone (town centre) is expected to deliver circa 2000 new homes. In addition:

- Deliver a mix of uses, including affordable homes, offices and other employment opportunities, social community facilities and retail to support new homes.
- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Deliver excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists to enable and encourage more sustainable travel link to neighbouring areas and reduces the dominance of traffic in the area.
- Deliver high quality homes, which is sympathetic to historic area which, preserves local amenity and looks to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas and National Trust Park.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Improve cycling facilities, enabling more walking and cycling, and work with Transport for London (TfL) in improve road safety on road for all users and the pedestrians to and around Morden Underground station.
- Maximising densities compatible with local context, sustainable design principles and public transport capacity.
- Explore the development of a decentralised energy network for the town centre.

Outside the Opportunity Area

Mitcham neighbourhood

Growth in this neighbourhood should contribute to the Council's wider vision and objectives for this part of the borough. Mitcham town centre is designated as a District centre and classified as 'low' for commercial growth and 'high' for residential growth in the London Plan (London Plan Table A1.1 - Town Centre Network). Growth in this neighbourhood must positively contribute to reducing the deprivation found here. In addition:

- Create a thriving 20 minutes' neighbourhoods with local services, which preserves local amenity.
- Make more efficient and intensive use of land, taking opportunities to provide a mix of tenure of new housing -especially affordable homes and provide flexible employment floor space which will provide jobs and training to improve the income deprivation.
- Explore opportunities for social housing estate regeneration. We will engage and work with housing providers in Mitcham neighbourhood. The Council's ambition is that regeneration will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address several social and economic issues. This is a long-term aspiration which will continue outside this plan period.
- Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Create safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Support local businesses, new enterprises/start-ups to create a better mix of market/retail offer in the town centre and local shopping parades.
- Ensure community and social facilities, are coordinated and tailored to meet local needs and contribute to tackle the health and income inequalities in this neighbourhood.
- Improve local accessibility and interchange at the Mitcham stations (Eastfields and Mitcham Junction) with enhanced walking, cycling and bus routes to improve the town centre footfall.

Raynes Park neighbourhood (including West Barnes)

Growth in this neighbourhood should contribute to the Council's wider vision and objectives for this part of the borough by:

- Creating a thriving a walkable neighbourhood or '20 minutes' neighbourhood' with local services, which preserves local amenity.
- Maintaining and creating new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Creating safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.
- Supplying a balanced mix of uses, including housing and affordable housing, employment opportunities, community facilities, and retail.
- Supporting local businesses and new enterprises.
- Delivering excellent public realm, with an improved safe route networks which enable and encourages cycling and walking with the needed infrastructure to encourage people to adopt sustainable travel such as cycling and scooter parking and facilities.

Wimbledon Chase

Development in this area must contribute to the Council's wider vision and objectives for this part of the borough by:

- Working with transport partners, such as Transport for London (TfL) and Network Rail to relieve congestion in Kingston Road and explore Wimbledon Station capacity upgrade.
- Creating a thriving local centre which will become a walkable neighbourhood or '20 minutes' neighbourhood' which will contribute to reduce poor air quality and improve the health for all.
- Creating safe and secure environments for all especially for women, children and the elderly and reduce opportunities for crime and antisocial behaviour by way Secure by design.

- Maintaining and creating new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Providing the highest quality that preserves local amenity, enhance and conserve Wimbledon Chase heritage assets, character and appearance of place.
- Creating a more vibrant, attractive area that builds on its location between Raynes Park and Wimbledon and its transport links.
- Enhancing connectivity and public realm, with more active frontages along Kingston Road to support businesses and encourage shoppers.
- Making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new homes.

Wimbledon Village

The village will maintain its competitiveness without altering its unique green village character of equestrian pursuits, outdoor activities, book festivals and other cultural events, farmers' markets and Wimbledon Common. Whilst development opportunities here are relatively limited, Wimbledon Village will continue to contribute to local economy with its mix of independent shops and cafes, retail and social venues, while respecting it's the character. Wimbledon Village will play a key role as the borough historical and sporting tourist destination.

- Maintaining and creating new public space and greening (including appropriate tree and shrub planting) of the street environment to:
 - improve air quality and help tackle climate change.
 - improve the health (including mental health) and wellbeing.
 - Mitigate flooding from all sources.
- Greener transport opportunities such as electric charging points and cycling parking facilities.
- Prioritise and promoting walking and cycling to reduce pressure on car parking and improve accessibility.
- Supporting independent retail, business and leisure active for example equestrian and other pursuits.

Urban development objectives

The Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan, acting as stepping stones to deliver the Spatial Vision. Merton's Community Plan, the London Plan (including the London Plan 2021) have guided Merton's strategic objectives.

Strategic objective 1: tackling climate change

To make Merton an exemplary borough in mitigating and adapting to climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

We will achieve this by:

- a. Ensure that development in Merton minimises its energy use by encouraging local efficient energy generation, achieving the highest possible environmental standards and is designed to adapt to, and reduce the effects of, climate change.
- a. Minimising energy demand, water use and greenhouse gas emissions, maximising renewable energy generation and prioritising re-use of existing building materials where possible to minimise resource use and waste.
- b. Being resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes the risk of flooding, water shortages, subsidence and the effects of overheating.
- c. Promoting circular economy to ensure that resources are kept in use at the highest level possible for as long as possible in order to consume fewer resources and minimise waste.
- d. Applying the waste hierarchy to ensure that waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means.
- e. Supporting sustainable energy infrastructure to produce energy more efficiently and utilise energy from waste.
- f. Promoting the retrofit of greater improved energy performance to existing buildings and greater connections with renewable and decentralised energy.

Strategic objective 2: supporting resilience

To support those who live, work and study in Merton in resilience and recovery, to create the conditions for growth and to direct the benefits of this growth so it best meets the needs of Merton's communities

We will achieve this by:

- a. Providing well-designed new homes, particularly affordable homes that meet the needs of households on the council's waiting list
- b. Requiring new homes and buildings to be sustainable, significantly reducing carbon emissions and resident's energy bills, towards achieving Merton's net zero carbon target in Merton's Climate Change Strategy
- c. Supporting investment in high streets and business areas, providing a platform for businesses and jobs recovery after Covid19 and beyond
- d. Protecting and improving the borough's parks and ensuring public access to formerly private open spaces. Improving access to nature and leisure facilities, including opportunities for sport, physical activities, play and relaxation to help boost people's physical and mental health
- e. To support the existing and future successful development of our town and neighbourhood centres, while adapting to changes in their role and how people shop.

Strategic Objective 3: places for people

To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.

We will achieve this by:

- a. Delivering quality new homes, associated infrastructure and social facilities that respect and enhance the local character of the area, in places with good public transport access;
- b. Delivering social and community services and infrastructure to support new homes through new development and the effective use of space;

- c. Providing a choice and mix of homes which are accessible, adaptable and sustainable, which apply high quality design standards to meet the needs of Merton's diverse communities;
- d. Ensuring that development makes the most efficient use of brownfield land and that is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport and access to amenities and services.
- e. Assessing the impact of major development proposals on physical and mental health and wellbeing to maximise the positive impacts and minimise adverse impacts.
- f. Working with key stakeholders such as our local Metropolitan Police Service 'design out crime' officers and planning teams, Emergency Planning Authority and British Transport Police to identify community safety needs, policies and sites required for their area and support provision of necessary infrastructure to maintain a safe and secure environment

Strategic objective 4: good growth

To create the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations, minimises the impacts of development, and to direct the benefits of this growth so it meets the needs of Merton's communities for homes, jobs, services and preserves and enhances the borough's unique character and appearance. We will achieve this by:

We will achieve this by:

- a. Supporting a diverse local economy and promoting a commercially viable, thriving mix of premises, including shops and services, business and industrial uses that increase jobs and services available to local people.
- b. Promote and support the successful development of the growth areas (Opportunity Area and Morden town centre) and to ensure that all development is supported by necessary infrastructure and maximises the opportunities and benefits for the local and surrounding communities and the borough as a whole.
- c. Supporting sustainable growth of the visitor economy for the benefit of local communities and promoting the borough as an attractive and inviting place to visit and enjoy.
- d. Encouraging and supporting low carbon behaviour in local businesses such as improving the energy efficiency of their buildings, maximising renewable energy generation, promoting sustainable and active travel, working with their supply chains to provide low carbon products and services, and minimising waste.

- e. Enhancing the learning environment to improve access to education, training and jobs
- f. Maximising opportunities for employment and local businesses, focusing on Merton's town centres and main employment areas along the Wandle Valley.

Strategic objective 5: place plans and the 20-minute neighbourhood

To promote a high quality urban and suburban environment in Merton, providing reliable, quality local services in accessible, well designed neighbourhoods.

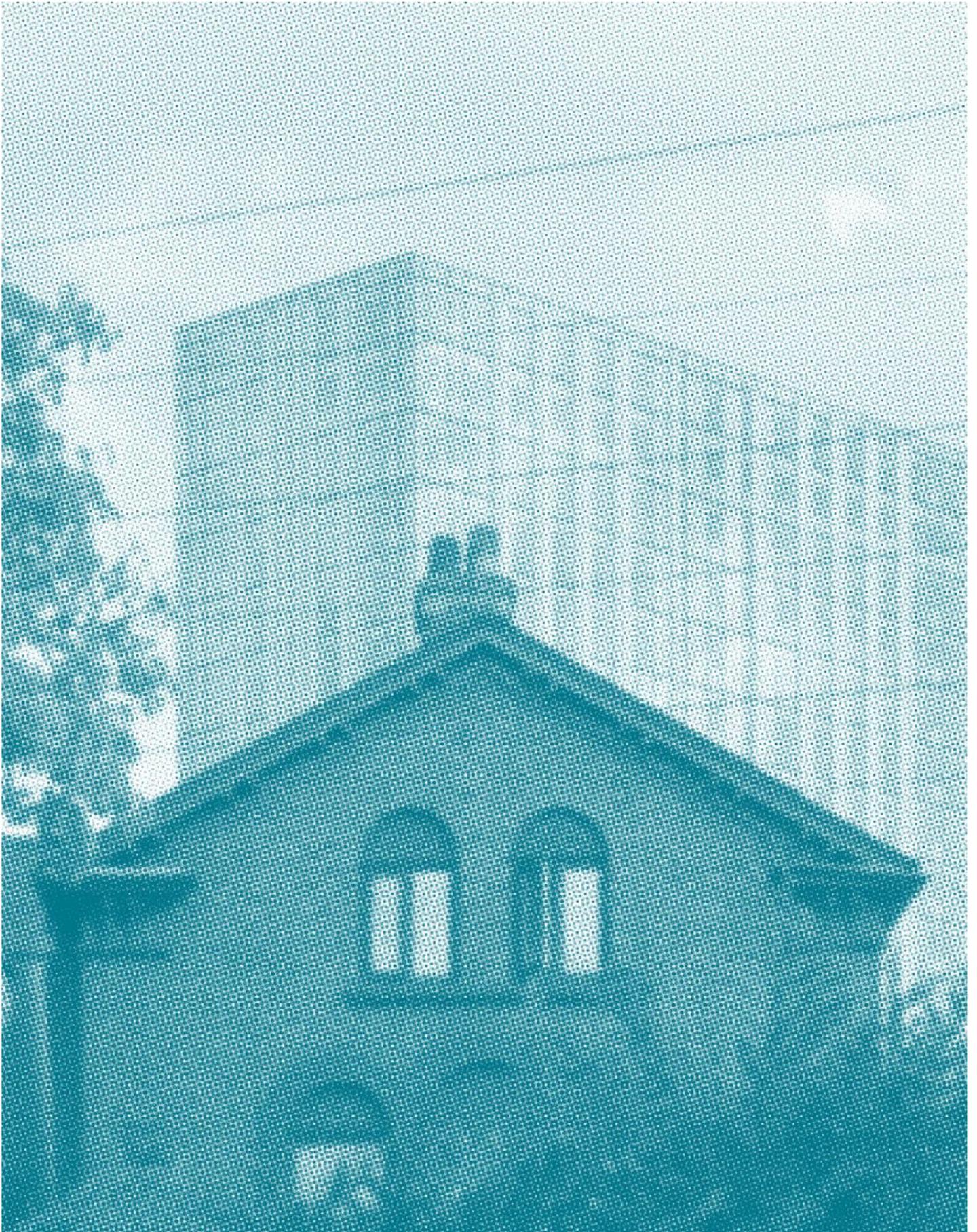
We will achieve this by:

- a. Encouraging low carbon and healthy lifestyles in line with Merton's net zero carbon target by promoting walking and cycling.
- b. Using Transport for London (TfL) Healthy Streets Approach to prioritise health in planning decisions.
- c. Supporting town centres and neighbourhood parades to boost the shops and services within them, working with businesses and residents to manage the changing nature of how we shop and use deliveries.
- d. Delivering community services and infrastructure to support new homes through new development and the effective use of space.
- e. Ensuring that development makes the most, efficient use of land and that is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport and access to amenities and services.
- f. Encouraging improvements to public transport, including quality and connectivity of transport interchanges, support the use of Smart City technology in the public highway and in co-ordinating deliveries.
- g. Conserving and enhancing the unique historic environment, heritage and cultural assets.

Spatial vision

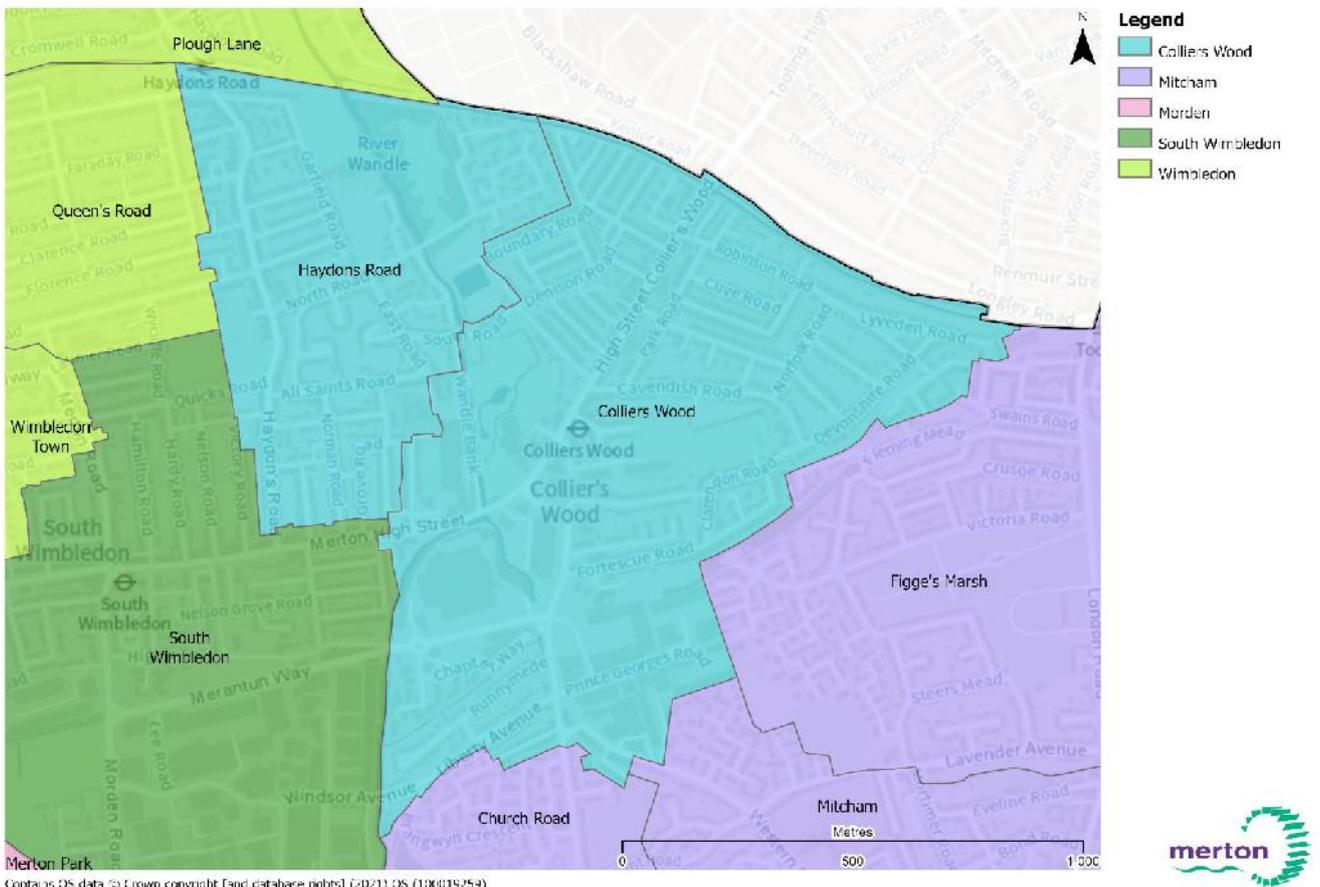
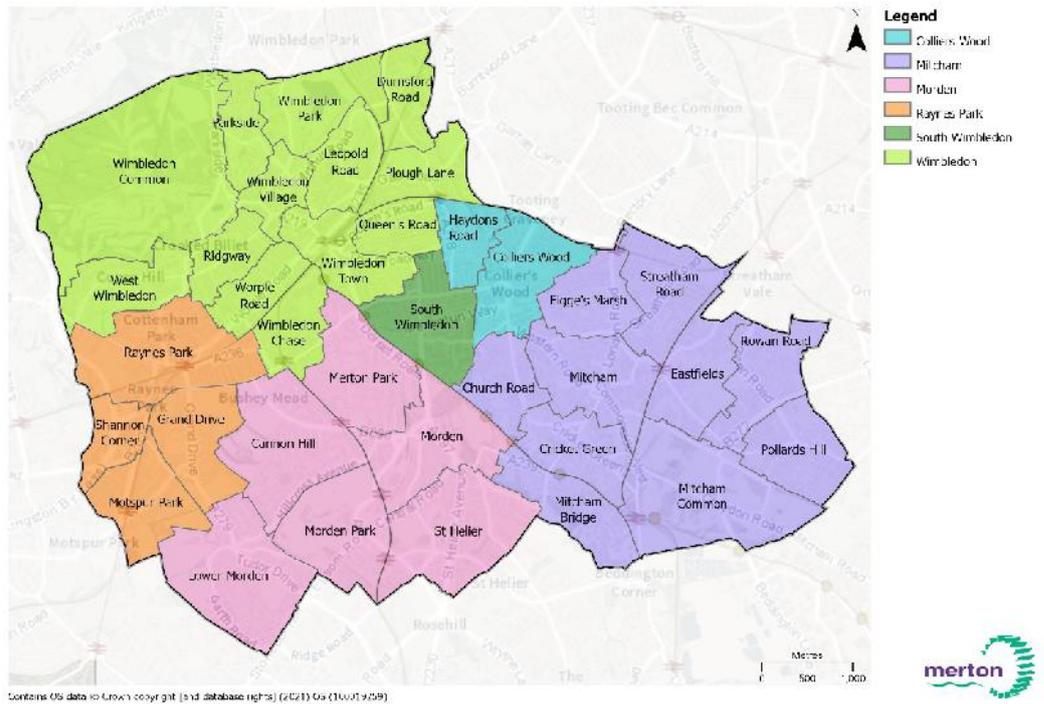
By 2036 Merton will:

- Be on our way towards becoming net-zero carbon by 2050 in partnership with other organisations and importantly with our residents:
- Continue to grow the borough's low carbon and circular economy.
- Have minimised greenhouse gas emissions and ensured resilience overheating, flooding and other the impacts of climate change.
- Reduced health and income inequality within the borough and the disparities between the east and west of the borough.
- Provided new homes meeting the needs of communities - especially more affordable homes for households on the council's waiting list.
- Created attractive safe and secure 20 minute neighbourhoods to live, work, and socialise.
- Created new and improved existing neighbourhoods with a range of mix tenure homes while respecting the local character of each area.
- Improved air quality, minimise noise, flood risk and other polluting impacts, and reduce carbon and water demands by minimising detrimental impacts from development.
- Improved access to our unique rich heritage and historic environment, for all, while encouraging innovations in building technology and improving sense of
- Achieved a shift in travel behaviour towards more people walking and cycling, particularly for short journeys.
- Improved interchange between transport modes and incorporating innovative solutions to manage deliveries and the highway network for all users.
- Continue to develop sustainable growth across the Merton and in our growth areas, for all.



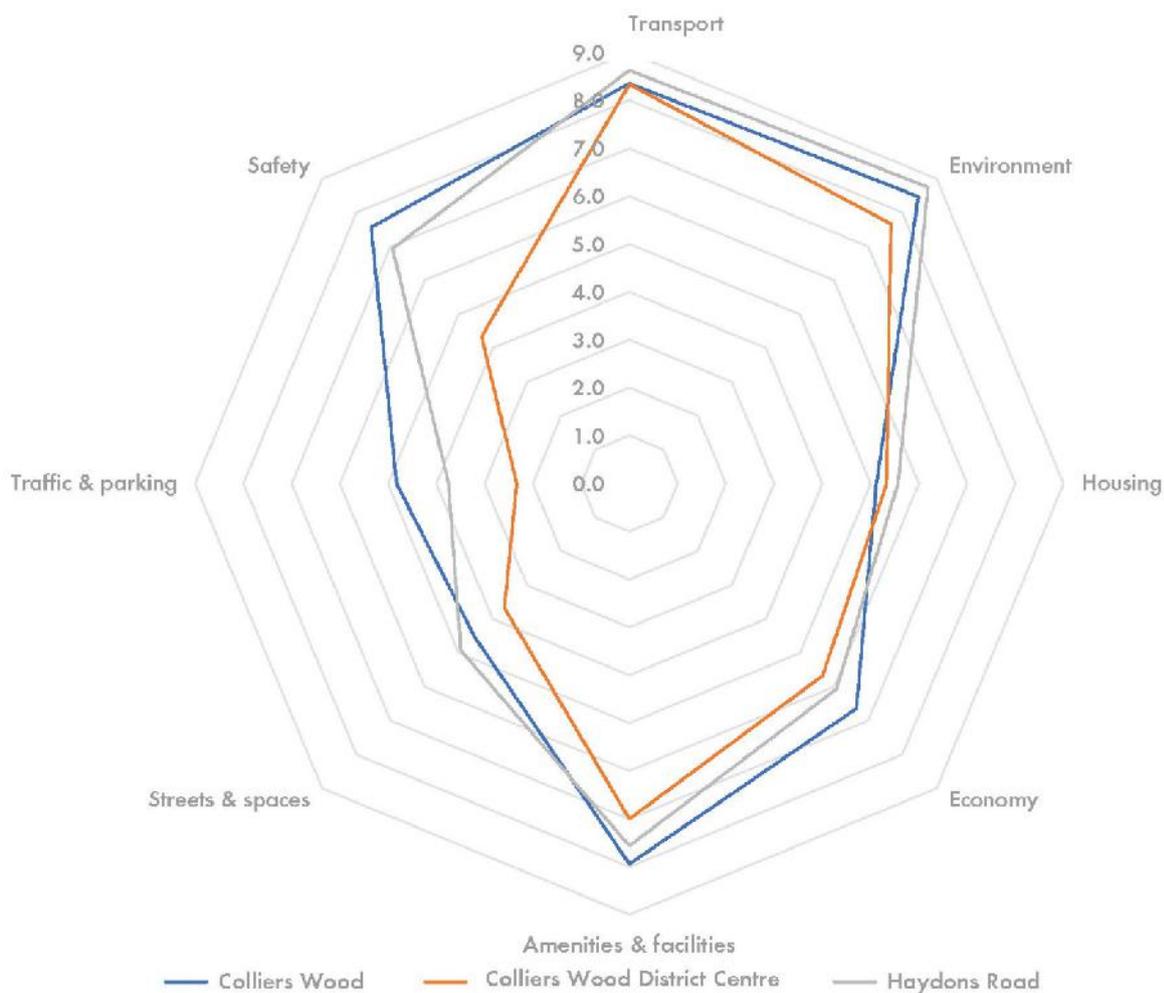
03.1. COLLIERS WOOD

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PLACE PROFILE: COLLIERS WOOD

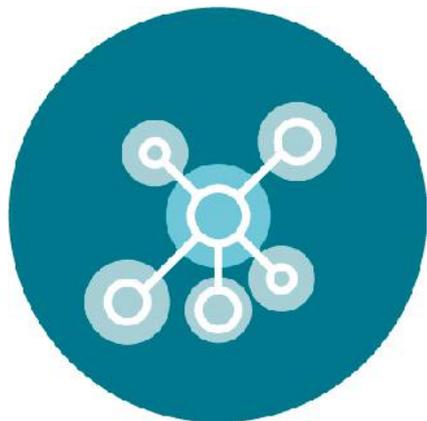
As part of the Borough’s ongoing Character Study, 415 Merton residents took part in this survey, of which 37 people lived in Colliers Wood. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform the Borough Character Study 2021.



Results from residents of Colliers Wood rating their neighbourhood

KEY OBJECTIVES: COLLIERS WOOD

The following objectives provide an overarching vision for Colliers Wood.



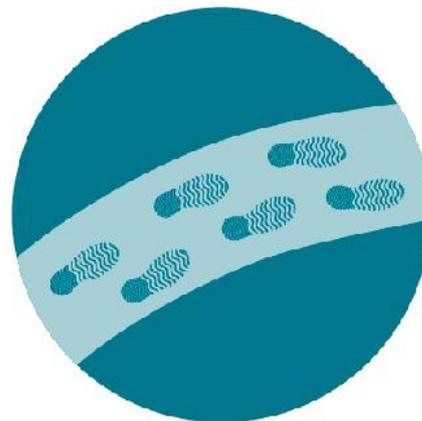
Create a new District Centre.

Building on the improvements led by 'Connecting Colliers Wood', support the redevelopment of retail outlets to create new streets and attractive public spaces providing homes above shops, and help make Colliers Wood easier to navigate for pedestrians and cyclists.



Better access to heritage

Improve access to heritage assets, conserving and enhancing archaeological sites and recognising their positive contribution to regeneration and new development.



Promote active travel.

Support improvements to the Wandle Trail and other transport infrastructure that will help to reduce road congestion and improve the public realm, particularly for pedestrians and cyclists.

CHARACTER: COLLIERS WOOD

These photos illustrate the diverse character found across Colliers Wood.





COLLIERS WOOD: POLICY N3.1

To create a thriving and attractive District Centre at Colliers Wood. The council's strategy for doing this is by:

- a. Treating Colliers Wood as a District Centre in the town centre hierarchy.
- b. Building on the improvements led by "Connecting Colliers Wood" by requiring development to help create coherent spaces of high-quality design, reconfiguring the centre to create a focus and making the environment more attractive to town centre users, prioritising pedestrians and cyclists.
- c. Supporting the redevelopment of single or two storey retail outlets to provide homes above shops, create new streets and public spaces and help make Colliers Wood easier to navigate and move around.
- d. Supporting a variety of different sized shop units and town centre uses to provide local services and encourage resilience.
- e. Working with the Environment Agency and, the GLA (Greater London Authority) and developers to reduce flood risk and to explore viable and appropriate flood mitigation measures complementary with improving the public realm particularly for pedestrians and cyclists.
- f. Improving access to heritage assets including Merton Priory, Merton Abbey Mills and Wandle Valley Conservation Area, conserving and enhancing archaeological sites and recognising their positive contribution to regeneration and new development.

Surrounding area of Colliers Wood

- g. Supporting development which helps to optimise housing potential and that maximises opportunities for use of sustainable modes of travel in this highly accessible location whilst managing vehicle use to reduce impacts on the road network.
- h. Improving the public realm in accordance with the Healthy Streets Approach and providing an improved network of safe and convenient pedestrian and cycle routes that connect to local areas and beyond, including via the Wandle Trail and Cycleway 7.

- i. Working with the Environment Agency to reduce flood risk and to explore viable and appropriate flood mitigation measures complementary with improving the public realm.
- j. Supporting improvements to the Prince Georges' business area.

JUSTIFICATION

- 3.1.1. Colliers Wood, as a town centre, has many unique assets including Merton Priory, the Wandle Park and a vibrant market at Merton Abbey Mills.
- 3.1.2. The town centre is situated along the river Wandle, linked by the Wandle Trail and is at the heart of the Wandle Valley Regional Park.
- 3.1.3. It has excellent public transport and road links. Colliers Wood underground station and the frequent bus services give residents, visitors and workers a variety of travel options with excellent Public Transport Accessibility Level (PTAL). Colliers Wood is situated on the A24 road and is the start of the Mayor of London's Cycle Superhighway 7, an 8.5-mile cycle trail starting from Colliers Wood to the City of London.
- 3.1.4. The past 10 years has seen significant investment in Colliers Wood which has transformed the look and feel of the town centre, particularly at the point of arrival from the underground station. The catalyst was the redevelopment of Britannia Point, (formerly the Brown and Root building, winner of London's Ugliest Building vote) and over £3 million investment in "Connecting Colliers Wood" by the Mayor of London, Transport for London, Merton Council and developers.
- 3.1.5. Colliers Wood now has a new public square at the heart of the town centre, better connections to the surrounding neighbourhoods and the wider Wandle Valley Regional Park particularly at the Baltic Close entrance to the Wandle Park. Improvements to the street scene, pedestrian crossings and junction improvements have provided better conditions for cyclists and pedestrians while smoothing the flow of traffic passing through the town centre, making Colliers Wood a safer place to walk and cycle to and around.
- 3.1.6. Other investments in the past 5 years include the new purpose-built library, shopfront improvements and new homes on the high street, nearly 300 new apartments above shops and services.

-
- 3.1.7.** There are some key sites within Colliers Wood which still feel disconnected from the Colliers Wood area and from each other, despite being adjacent or within easy walking distance of each other. Consultees to Stage 1 Local Plan identified Sainsbury's Supersaver, Priory Retail Park and the Tandem Centre as unattractive, inward-looking, lacking in recent investment, car-dominated; they also identified the pavements and public realm along Merantun Way as in need of similar investment to encourage walking and cycling and improve the links between the sites.
- 3.1.8.** These three sites at Sainsbury's Supersaver, Priory Retail Park and the Tandem Centre are in single freeholds but with multiple tenancies. These three sites currently support a significant number of jobs and businesses and provide town centre shops and services. However, should redevelopment opportunities come up within the lifetime of this Plan, the Council would strongly support more efficient use of these sites, continuing to support shops, services and business floorspace and providing new homes on upper floors where practicable. Creating more traditional street formats within these sites – with active frontages on the ground floor and offices or flats above shops - would make more efficient use of valuable land and help make Colliers Wood easier to navigate. We will also support measures that improve public transport access, walking, cycling, air quality and help minimise road congestion, noise and excess traffic within Colliers Wood.
- 3.1.9.** Merton supports the Mayor of London's proposal that Colliers Wood is part of the new London Plan's proposed Opportunity Area at "*Wimbledon / South Wimbledon / Colliers Wood*", with a target of 5,000 homes and 6,000 jobs.
- 3.1.10.** Colliers Wood already functions as a District Centre, containing a broad mix of sizes and formats, a variety of town centre uses (shops, markets, restaurants, theatre, visitor attractions, public space, restaurants, library, etc.) and since the Connecting Colliers Wood investment is now well integrated into the surrounding area. The Council proposes to treat it as a District Centre for planning purposes. The alternative would be for Colliers Wood to be considered an "out of centre" location in planning terms. In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large "out of centre" shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) 2019 (chapter 7), the London Plan and Merton's own planning policies.

- 3.1.11.** Given the existing volume of retail floorspace in Colliers Wood and the changing nature of how we all shop, it is not the Council's intention to significantly increase the quantity of retail offer in Colliers Wood but to encourage the provision of a mix of different sized premises and a wider range of business types (e.g. gyms, restaurants, social activities) to serve residents and support a more resilient town centre.

London's Opportunity Area at Wimbledon / South Wimbledon / Colliers Wood

- 3.1.12.** The London Plan has identified a new Opportunity Areas in Merton directly including "Wimbledon, Colliers Wood / South Wimbledon", with an indicative capacity for 5,000 new homes and 6,000 jobs.
- 3.1.13.** Crossrail2 will not be finished until after 2036, therefore the benefits from over-station development or development on sites that are currently safeguarded by Crossrail2 will arise outside this Local Plan period.
- 3.1.14.** However, there are opportunities outside the immediate Wimbledon area in Colliers Wood, South Wimbledon and Morden to work towards delivering the London Plan's proposed Opportunity Area targets for homes and jobs, even if the Crossrail2 sites will not be realised within this Plan period.
- 3.1.15.** The regeneration of Morden is proposed to deliver circa 2,000 new homes and another c2,000 homes will be delivered around South Wimbledon, mainly via estate regeneration during the lifetime of this plan. For jobs growth, South Wimbledon Business Area is already one of south London's largest and most successful business areas (outside town centres) and the Council will continue to support this Strategic Industrial Location.

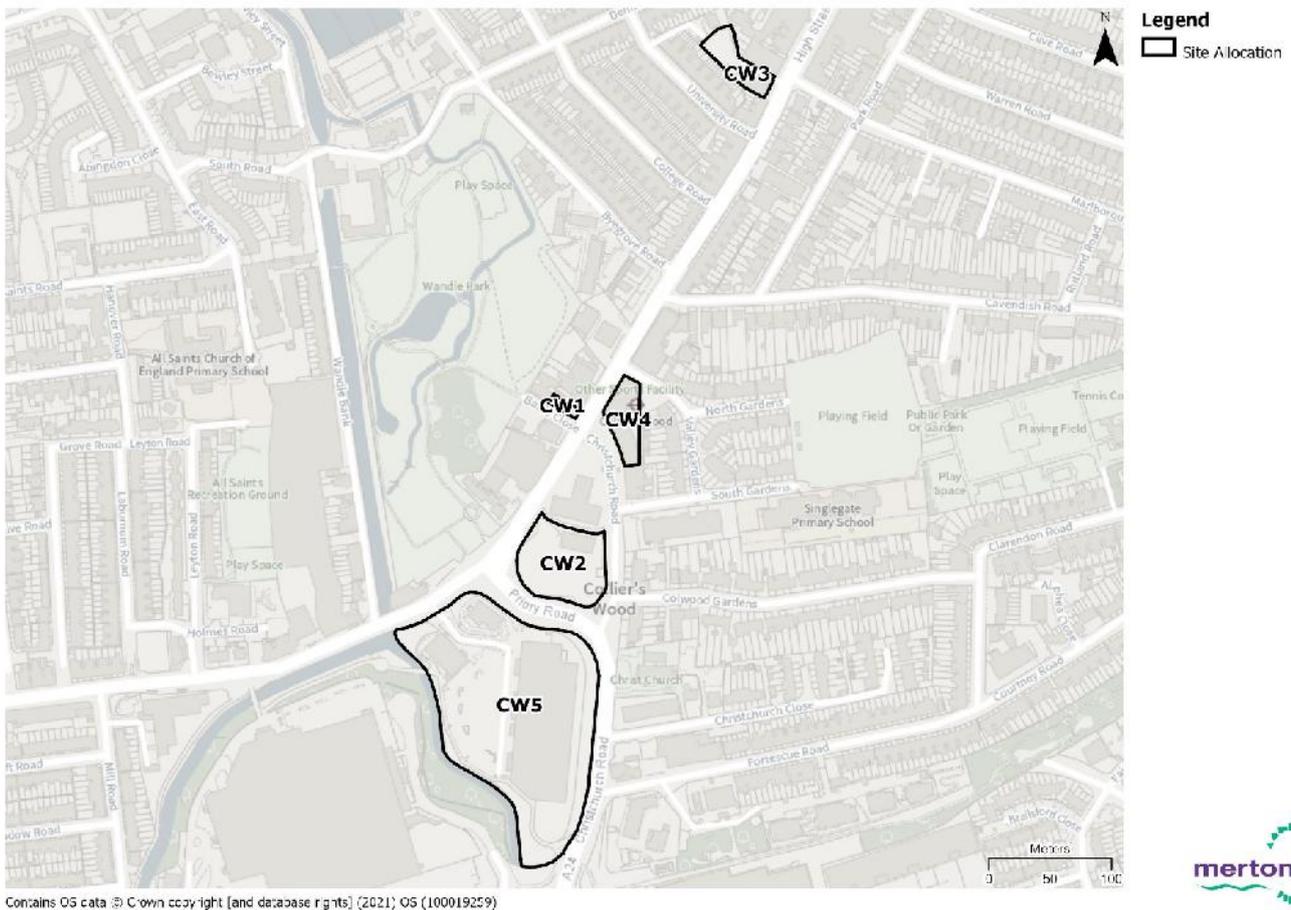
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- 3.1.16.** The primary location for business and jobs growth is Wimbledon town centre, which is an internationally recognised, highly accessible and most attractive location for office-based business. There are clear opportunities for business space and jobs growth in Wimbledon town centre out with Crossrail2, for example along the Broadway, St George's Road and Worple Road within the. However, there are some significant sites (Wimbledon Bridge House, the area around Centre Court, Wimbledon Station and adjoining Alexandra Road, Dundonald Goods Yard) which are safeguarded for Crossrail2 development so won't provide significant new business space and job opportunities until Crossrail2 is finishing in the 2030s.
- 3.1.17.** Colliers Wood has opportunities for new homes and jobs within the town centre. The town centre already supports a significant number of jobs in retailing and other town centre uses, and the Council will continue to support these.
- 3.1.18.** Colliers Wood town centre may be an appropriate location to accommodate higher density development including tall buildings. Britannia Point should form part of a family of buildings of varying height, forming a coherent cluster. This can then form the basis for a coherent group of buildings that relate well to each other in terms of scale, massing, form and architecture. New buildings must be designed, orientated and laid out within the site and within the context of nearby buildings and structures to mitigate the potential for uncomfortable wind conditions at ground level, which would particularly affect pedestrians and cyclists.
- 3.1.19.** Locations that may be sensitive to tall buildings include the historic environments of the Wandle Park, Merton Abbey Mills and Merton Priory where the potential impact on the significance and scale of the historic environment and open spaces should be considered. For locations near to the edge of the town centre boundary the sensitivity of low-rise residential neighbourhoods should be considered.
- 3.1.20.** The heritage of the Wandle Valley is a particularly important part of the history of the borough and an important element of Merton's identity. Development proposals in Colliers Wood and its surrounds should strengthen the character and local distinctiveness of the area by playing a positive role in relation to the heritage assets, which include Merton Priory and the Wandle Valley Conservation Area.

- 3.1.21.** Currently, Colliers Wood and the surrounding neighbourhood are not considered attractive to the office market. Creation of an attractive, permeable environment in central Colliers Wood with a better street layout, a greater mix and a wider range of non-retail uses could make Colliers Wood a more desirable destination for office-based businesses, including shared workspaces, in turn increasing the employment potential of the centre.
- 3.1.22.** Environmental factors, particularly the risk of flooding, as identified in the Sustainability Appraisal and the Strategic Flood Risk Assessment 2018, will need to be mitigated against before Colliers Wood can deliver to its full potential. Flood mitigation measures and any other environmental considerations will have to be economically viable and in line with the overall aim of creating a thriving and attractive town centre if they are to benefit the area.

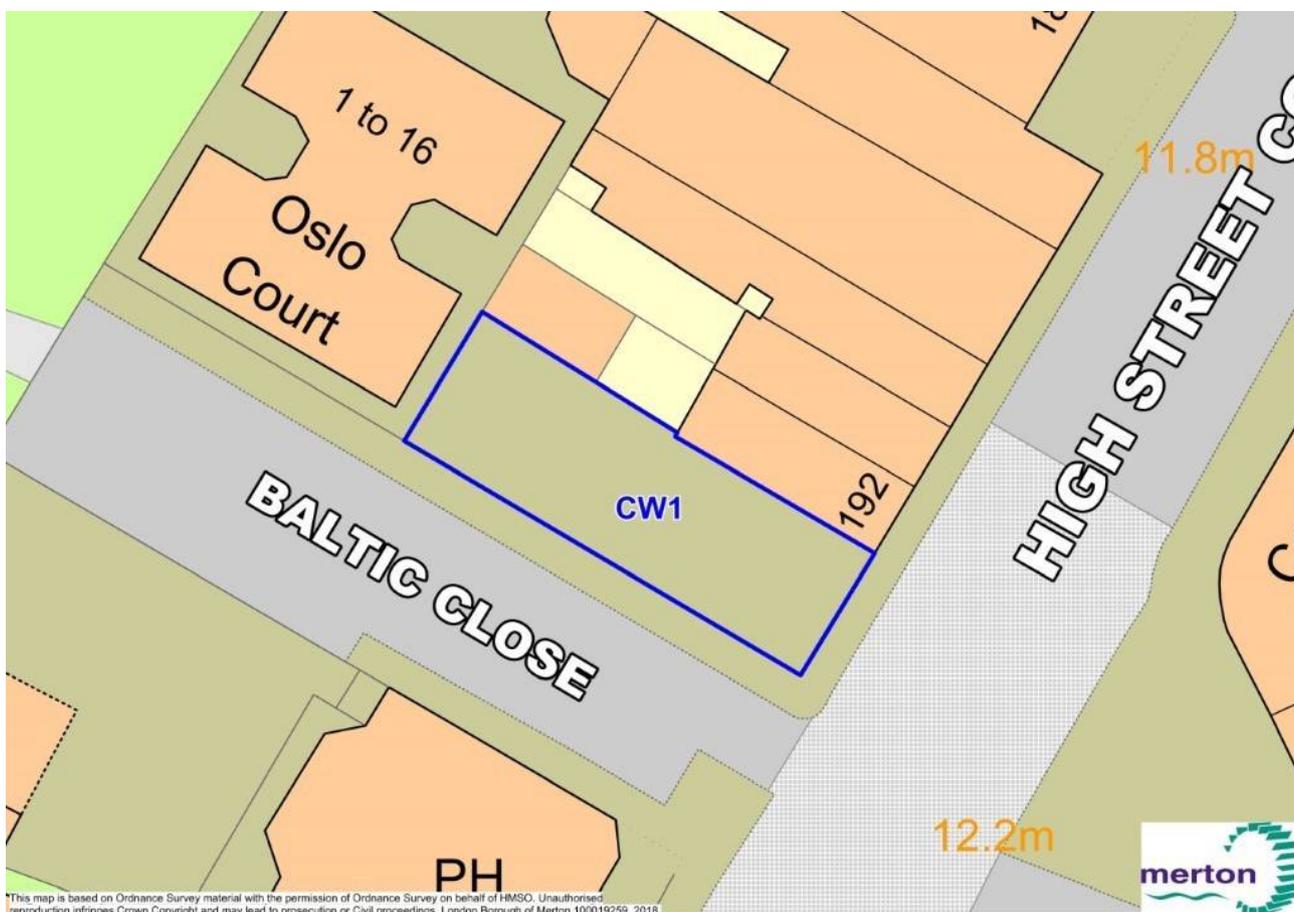
Site Allocations

Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocations will be determined against planning policies (including the London Plan).



SITE CW1: Baltic Close 194-196 High Street Colliers Wood, SW19 2BN



Ward: Colliers Wood
Site description: The site is a hardstanding area on the corner of High Street Colliers Wood and Baltic Close, a recently refurbished pedestrian and cycle route from High Street Colliers Wood to the Wandle Park. At the opposite side of Baltic Close to the southwest of the site is a three-storey public house (The Charles Holden). To the west of the site is a four-storey residential block (Oslo Court) with the Wandle Park beyond. The High Street Colliers Wood frontage of the site if adjoined on the northern side by a three-storey shopping parade with shops at the ground level and flats above. The site is directly opposite Colliers Wood underground station. The site is close to the A24 which forms part of the Transport for London Road Network (TLRN). The site is located 140m east of the River Wandle.
Site owner: Transport for London (TfL)
Site area: 0.02ha
Existing uses: Hard standing area – fenced off.
Site allocation: Residential and commercial mixed-use scheme
Site deliverability: 0-5 years
Indicative site capacity (new homes): 1- 4 new homes
Design and accessibility guidance:

The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for new homes and jobs is 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA (Opportunity Area) and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Development must respect the character, heritage assets and the views into and from the neighbouring conservation area and the setting of the listed building (Colliers Wood tube station) found to the east of the site.

Development should protect and enhance the existing cycle and pedestrian route. The site may be required to make provision for docking areas for cycle/ scooter hire schemes.

The site is within Flood Zone 2 however, it is noted that when considering the impact of climate change, the site is shown to be at risk of flooding from the River Wandle.

Development proposals must incorporate the recommendations of Merton's Strategic Flood Risk Assessment (SFRA).

Infrastructure Requirements:

There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. Should residential development not take place on Site CW1, then we would welcome a secure cycle hub on this site as it is opposite the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engages with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (TLRN) - no new access or servicing take place from the A24 road, advice from TfL.

The site location.

Impacts Listed Buildings or undesignated heritage assets.	Opposite Colliers Wood underground station building which is Grade II listed.
Impacts a Conservation Area	Wandle Valley Conservation Area.
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts flooding on flood from all sources.	Flood zone 2 and in an area of critical drainage issues.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts on a designated open space.	Site is within the Wandle Valley Regional Park 400m buffer area. The site is close to Wandle Park a

	designated Open Space, Metropolitan Open Land, Wandle Valley Regional Park.
Impacts ecology designation.	Site is close to a Site of Importance for Nature Conservation (SINC) and Green Corridor at Wandle Park.
Public Transport Accessibility Level (PTAL)	PTAL 6A excellent access to public transport.

SITE CW2: Car Park South of Britannia Point, 125 High Street Colliers Wood, SW19 2JG



Ward: Colliers Wood

Site description:

A prominent site within the Colliers Wood Town Centre boundary, to the south of the existing Britannia Point as the second phase of the same development. The Council has proposed the site allocation to give certainty to the delivery of this site for town centre type uses on the ground floor with residential development on upper floors.

The site was a multi-storey car park and formerly a small retail shed, now both demolished. The site lies due south of Britannia Point (formerly Brown and Root), a development of c170 apartments with commercial on the ground floor. To the south lies Priory Road with Priory Retail Park at the other side. To the east lies Christchurch Road with a church and homes facing the site. To the west, across the A24 lies the Wandle Park.

The site is within 100m of Colliers Wood underground station and served by a variety of bus routes. The site is within c50m of London Underground subsurface tunnels and infrastructure; therefore, London Underground Infrastructure Protection must be consulted.

Significant investment has been made in the public realm for walking and cycling in and around the site by the adjacent Britannia Point landowners, Merton Council and TfL (Transport for London) as part of the [Connecting Colliers Wood](#) regeneration project.

Site owner: Criterion Capital.
Site area: 0.43ha ha
Existing uses: Vacant
Site allocation: Delivery of new homes as part of a mixed-use development. Residential on upper floors with any of the following on the ground floor (financial and professional services, food and drink, office, assembly, health/day centre) or other sui generis use that is a suitable mix right for a town centre.
Site deliverability: 5-10 years
Indicative site capacity (new homes): 150- 200 new homes.
<p>Design and accessibility guidance:</p> <p>The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for new homes and jobs is 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA (Opportunity Area) and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.</p> <p>Delivery of new homes within the Wimbledon/Colliers Wood Opportunity Area in a universally accessible sustainable location on an unused brownfield site.</p> <p>Development will need to be of a scale, layout and design to minimise harm to the residential amenity of the existing residents in Britannia Point and on Christchurch Road, based on the principles of a family of buildings of varying height, forming a coherent cluster that enhances the wider Colliers Wood area.</p> <p>Development will need to continue and contribute to the public realm improvements delivered via Connecting Colliers Wood with Britannia Point landowners, Merton Council and Transport for London.</p> <p>The site may be required to make provision for publicly accessible cycle storage (hub) and docking stations for cycle/ scooter hire schemes.</p> <p>Development must enhance pedestrian and cycle access routes around the site to improve the wider cycle and pedestrian network.</p> <p>In a mixed-use development, residential uses should be on the upper floors.</p> <p>Development should optimise the use of the site and compliment the surrounding area, including the existing building at Britannia Point and the views from the Metropolitan Open Land.</p> <p>Development will need to create and provide an active street frontage along Christchurch Road, Priory Road and High Street Colliers Wood on the ground floors adding natural surveillance.</p> <p>Development will need to complement the surrounding area including Britannia Point and the views from the Metropolitan Open Land at Wandle Park</p> <p>The potential impact of any proposed development on archaeological heritage needs to be investigated.</p>

Development proposals will need to incorporate all the site-specific flood mitigation recommendations in the Merton's Strategic Flood Risk Assessment (SFRA) associated with the site and surrounding area. A sequential approach should be applied within the site, steering development towards those areas where the hazard rating is lower and at lower risk of surface water flooding.

Infrastructure Requirements:

Development proposal for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Any development proposal for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water have indicated that the scale of development for this site that, upgrades of the water supply network infrastructure and wastewater network are likely. It is recommended that the developer with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.

The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council requires as part of any submitted planning application evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (LTRN) - no new access or servicing take place from the A24, advice from TfL.

The site is within c50m of London Underground subsurface tunnels and infrastructure; therefore, London Underground Infrastructure Protection must be consulted. The Council will require evidence that the developer has engaged with London Underground as part of the planning application. The Council will engage with London Underground Infrastructure Protection as part of the planning process.

The site location	
Approach to tall buildings	A mixed-use redevelopment within the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape and based principles of a family of buildings of varying height, forming a coherent cluster that enhances the wider Colliers Wood area.
Impacts Listed Buildings or undesignated heritage assets.	Site is 100m away from the Colliers Wood Station listed building.
Impacts a Conservation Area	No

Impacts an Archaeological Priority Area	Yes, Wandle Valley/Colliers Wood Archaeological Priority Zone Tier 2.
Impacts a Scheduled Ancient Monument.	No
Impact on flooding from all sources	Yes, Flood Zone 2 and within an area susceptible to surface water flooding in a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts a designated open space.	Yes, within Wandle Valley Regional Park 400m buffer zone. Wandle Valley Regional Park, Metropolitan Open Land and designated Open Space at Wandle Park is nearby.
Impacts on an ecology designation.	Site within 500m of a Sites of Importance for Nature Conservation (SINCs) and Green Corridor.
Public Transport Accessibility Level (PTAL).	PTAL 5 Very good access to public transport.

SITE CW3: Colliers Wood Community Centre, 66-72 High Street Colliers Wood, Colliers Wood, SW19 2BY



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Ward: Colliers Wood
Site description: Colliers Wood Community Centre is a detached two storey building with a hexagonal rear car park. It is found on the west side of High Street Colliers Wood and is surrounded by terraced housing adjoining the site to the rear and mixed use residential and commercial buildings of two or three storeys in height along the High Street. Immediately next to the site is a new development with small supermarket on the ground floor and apartments above. The site is close to the A24 which forms part of the Transport for London Road Network (TLRN).
Site owner: Merton Council
Site area: 0.13ha
Existing uses: Community Centre
Site allocation: Mixed-use community and residential.
Site deliverability: Between 5-10 years.
Indicative site capacity (new homes): 6-10 new homes
Design and accessibility guidance: The site is within an Opportunity Area (OA designated in the London Plan). The OA has an indicative capacity of 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Development needs to supply active frontages on the ground floor, a mix of uses including community uses on lower floor and residential on upper floors or to the rear of the site creating a more secure environment.

Development will need to appropriately manage access arrangements, parking demand, traffic and road safety impacts on neighbouring streets and local amenity.

Development proposals will need to protect the residential amenity of those properties next to, and in the vicinity of the site.

Investigation of the potential impact of any proposed development on archaeological heritage will be needed.

The proposed use of the site is compatible with the flood zone therefore the Exception Test is not needed. However, several site-specific recommendations are made in the Merton’s Strategic Flood Risk Assessment (SFRA) which must be incorporated in development proposals. Development proposals must include sustainable drainage measures.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton’s Infrastructure Delivery Plan.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport for London Road Network (LTRN). Transport for London requests no new access or servicing take place from the A24. The site is within c50m of London Underground subsurface tunnels and infrastructure; therefore, developer must consult London Underground Infrastructure Protection. The Council will require evidence that the developer has engaged with London Underground as part of any submitted planning application. The Council will engage with London Underground Infrastructure as part of the planning process.

	The site location
Impacts a Conservation Area	No

Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts flooding from all sources.	Yes, Flood Zone 2 (eastern side of the site – running north to south).
Is in a town centre.	The site is within Colliers Wood town centre.
Is in an Opportunity Area	Yes
Impacts a designated open space.	Located within the 400m buffer of the Wandle Valley Regional Park.
Impact an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 5, good access to public transport services.

SITE CW4: Colliers Wood Station, 2-24 Christchurch Road, Colliers Wood, SW19 2HR



Ward: Colliers Wood

Site description: Site CW4, is owned by Transport for London as a freeholder and includes Colliers Wood underground station made of Portland stone and adjacent commercial premises, numbers 2-24 Christchurch Road. The commercial premises are occupied by a wide variety of uses including a Post Office, shops, bar / restaurant, estate agent, laundrette and takeaway.

The site faces Britannia Point (former Brown and Root building), a 19-storey residential development with commercial units on the ground floor. To the east of the site on the other side of High Street Colliers Wood are the Charles Holden public house, the Baltic Close entrance to the Wandle Park and a terrace of three storey shops. To the north of the site is Valley Road and beyond is a single storey commercial building and then the new Colliers Wood Library with apartments above which extends to 6 storeys. To the west of the site are the rear gardens of terraced houses in Valley Road.

Significant investment has been made in the public realm for walking and cycling in and around this site by the adjacent Britannia Point landowners, Merton Council and Transport for London as part of Connecting Colliers Wood. The site is close to the A24 which forms part of the Transport for London Road Network (TLRN).

Site owner: Transport for London (TfL)

Site area: 0.15ha

Existing uses: Underground station (Northern Line) and commercial premises

Site allocation: Any of the following or a suitable mix of retail, financial and professional restaurant or café, hot food takeaway, drinking establishment, leisure/health centre, offices and residential on uppers floors. The Post Office should be retained.

Site deliverability: 10 – 15 years

Indicative site capacity (new homes): 25-35 new homes.

Design and accessibility guidance:

The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for new homes and jobs is 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA (Opportunity Area) and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Site may be required to make provision for publicly accessible cycle storage (hub), docking stations for cycle/ scooter hire schemes.

A variety of town centre use and retail should be accommodated at ground floor to supply active frontage along High Street and Christchurch Road.

Development proposals must be of a suitable density and design that responds positively to its context.

Development proposals will need to compliment the Charles Holden designed listed Underground station.

Development must optimise the use of the site and compliment the surrounding area, including the existing building at Britannia Point and the views from Baltic Close and the amenity of the residents in Valley Road.

The site is within 50m of London Underground subsurface tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.

Development will need to incorporate flood management measures as set out in Merton's Strategic Flood Risk Assessment within the design and layout to ensure the operation of this critical infrastructure (the station) and surrounding buildings. The station is classified as critical infrastructure therefore development proposals must incorporate sustainable drainage measures. The proposed use for the site is mixed-use including residential which is defined as More Vulnerable (which is allowed in Flood Zone 2). The Exception Test is not needed; however, development proposals must incorporate the recommendations of Merton Strategic Floor Risk Assessment for this site and surrounding area.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

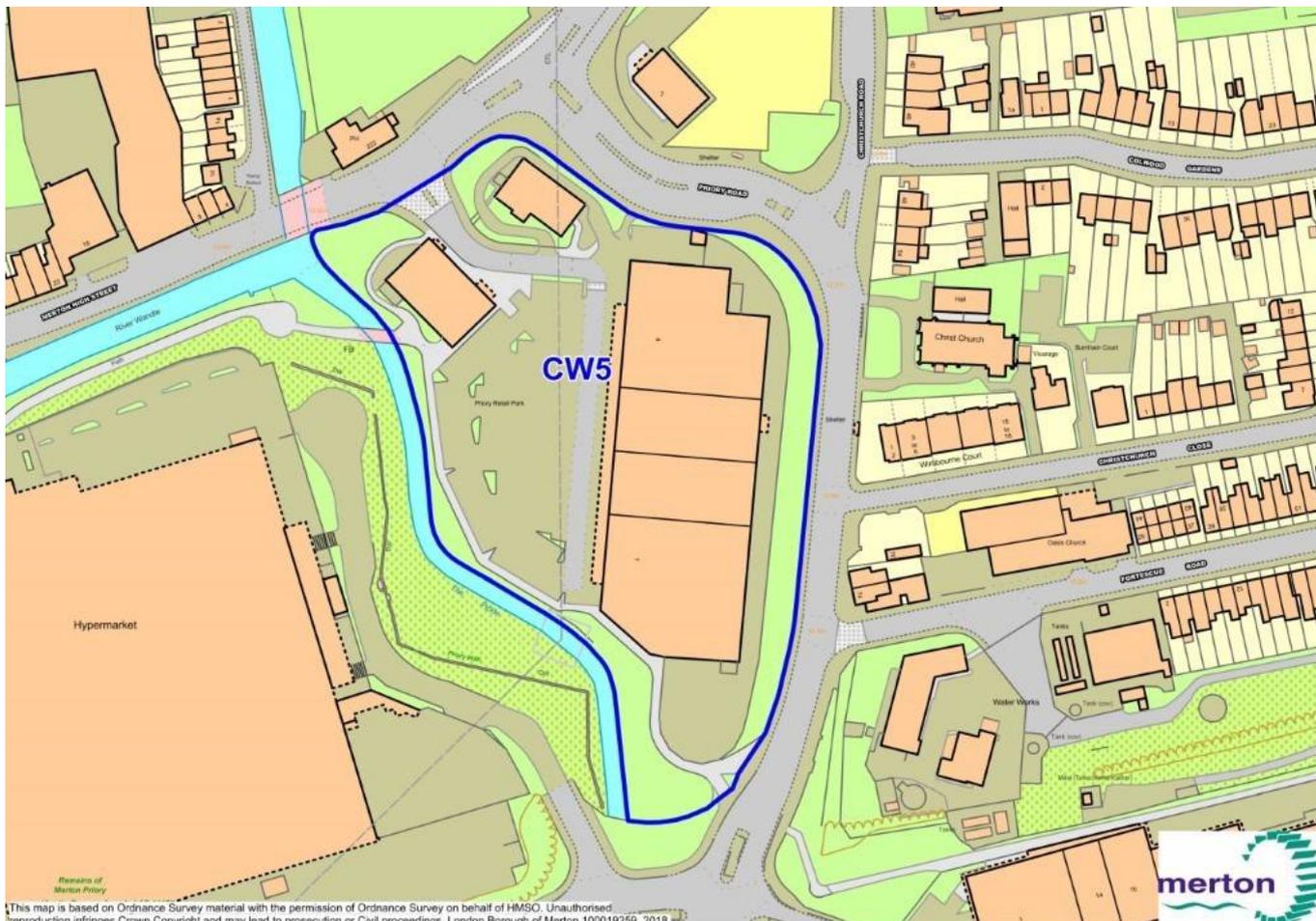
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site is close to the A24 which forms part of the Transport of London Road Network. Transport for London requests no new access or servicing take place from the A24. As noted, it is within the consultation zone for the Northern Line tunnels and so London Underground Infrastructure Protection should be fully consulted about any sub surface works. The Council will require evidence that the developer has engaged with London Underground submitted with any planning application for the site.

There is a need for secured cycle parking provision for commuters in Colliers Wood and there is a lack of space on the public highway to facilitate this. In the long term, should a cycle hub not be installed on other Transport for London sites including Site CW.1, then in the long term we would welcome a secure cycle hub on this site as it is located close to the underground station and accessible to both the Wandle Trail and the Cycle Superhighway.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, station building Grade II listed
Impacts a Conservation Area	Yes
Impacts an Archaeological Priority Area	Yes, the Wandle Valley/Colliers Wood Archaeological Priority Tier 2, within the Wandle Valley Regional Park.
Impacts a Scheduled Ancient Monument	No
In on flooding from all sources	Yes, flood zone 2 (75% of the site) and within an area that is susceptible to surface water and groundwater flooding.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts a designated open space.	Yes.
Impacts an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access to public transport.

SITE CW5: Priory Retail Park, Colliers Wood, 2-24 Christchurch Road, Colliers Wood, SW19 2HR



Ward: Colliers Wood

Site description:

Priory Retail Park is a large purpose-built single storey retail warehouse with dedicated car park, divided into five retail units. Within the north of the site is a low-rise single storey drive thru' Burger King restaurant. The site is bounded by Priory Road to the north and at the other side of the road is a cleared site, (proposed for allocation as CW2 in this Local Plan), then the 19 storey Britannia Point.

Within the north-western boundary of the site lies a two-storey building with a bar/restaurant on the ground floor and a children's soft play area on the upper floor. The site is bounded by Merton High Street and beyond views from Wandle Park.

The western boundary of the site is formed by the Pickle Ditch, a tributary of the river Wandle, a riparian green space and remnants of the historic Merton Priory Wall. Sainsbury's and Marks and Spencer are found beyond that in a single purpose-built podium supermarket with car parking underneath.

The centre of the site is occupied by a large surface car park. The site is accessible by car from Merton High Street to the north. The A24 (Transport for London Road Network) sets, the eastern and northern boundary, with a substantial amount of landscape left to the eastern boundary, on which advertising hoardings sit. Electricity wires cross the site and a pylon lies within the site boundary.

Site owner: RDI REIT

Site area: 2.1ha

Existing uses: Retail sheds and a surface car park.

Site allocation: Creation of streets - a suitable mix of town centre uses on the ground and lower floors (shops financial and professional services, food and drink, office, assembly, health/day centre or other sui generis use appropriate for a town centre), residential on upper floors and public space.

Site deliverability: 10- 15 years.

Indicative site capacity (new homes): 80-120 new homes.

Design and accessibility guidance:

The site is within an Opportunity Area (designated in the London Plan). Opportunity Area Indicative capacity for 5000 new homes and 6000 new jobs. This site is expected to contribute to the OA and future growth in Merton that is socially and economically inclusive and environmentally green and sustainable.

Significant investment has been made via Connecting Colliers Wood to the public realm and street scene including the Wandle Park. Development proposals will need to contribute to and compliment the Connecting Colliers Wood in its design, layout and public realm, creating a recognisable street pattern.

Development should fully protect and enhance publicly accessible pedestrian and cycle access routes through the site and explore options for providing new links through and around the site to improve the wider cycle and pedestrian network. We will protect the existing cycle route across the site from the A24 near the Tandem Centre, which runs alongside the Pickle Ditch to Merton High Street as this allows pedestrians and cyclists to bypass the busy road network. We will also seek to incorporate a new cycle route alongside the A24 to the eastern side of the site.

Proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips through appropriately managed car parking, deliveries and servicing,.

Opportunity to improve connectivity across Colliers Wood and improve the condition of the Pickle Ditch.

Development proposals must optimise the site's use for town centre type uses in a more resilient, adaptable, greener and attractive layout reducing the dominance of car parking.

Active frontages must be provided on the ground floor including along Colliers Wood High Street and the River Wandle to enhance Colliers Wood's attractiveness as a town centre.

Development proposals must incorporate sustainable drainage measures to address the issue associated with the location within a flood zone and other flooding issues. Development proposal will need to incorporate all the recommendations in the Merton's Strategic Flood Risk Assessment associated with the site and surrounding area.

The impact of development on archaeological heritage must be investigated and development proposals must respect the historic setting, including the remnants of the Merton Priory Walls.

The overhead power lines supported by electricity pylons will influence the layout, massing and potential uses on parts of the site.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, but there are no infrastructure concerns for the wastewater network or wastewater treatment infrastructure capability. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development>

The Council will require evidence of engagement with Thames Water with any submitted planning application. The Council will also, engage with Thames Water and seek their advice about the development of this site, as part of the planning process.

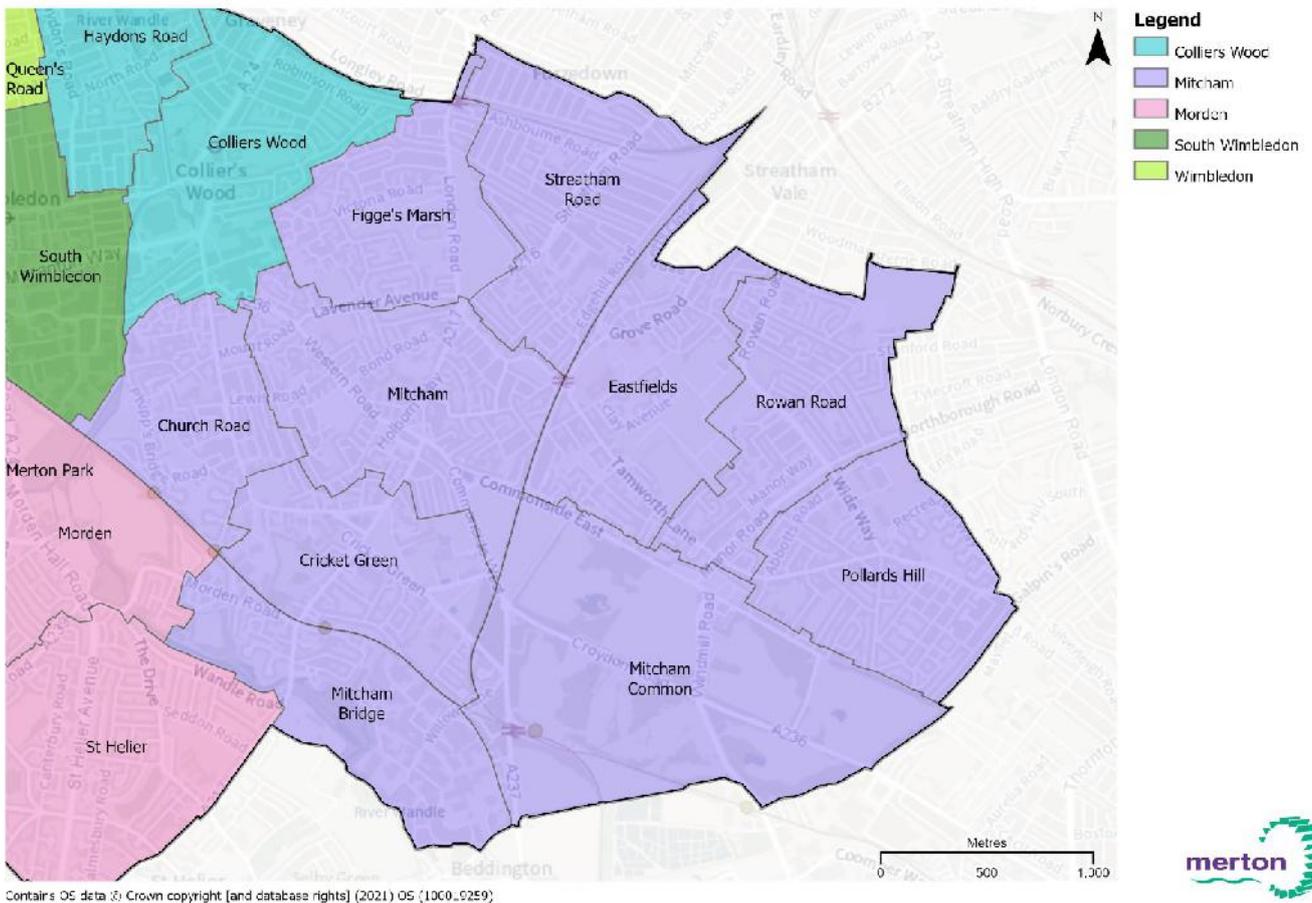
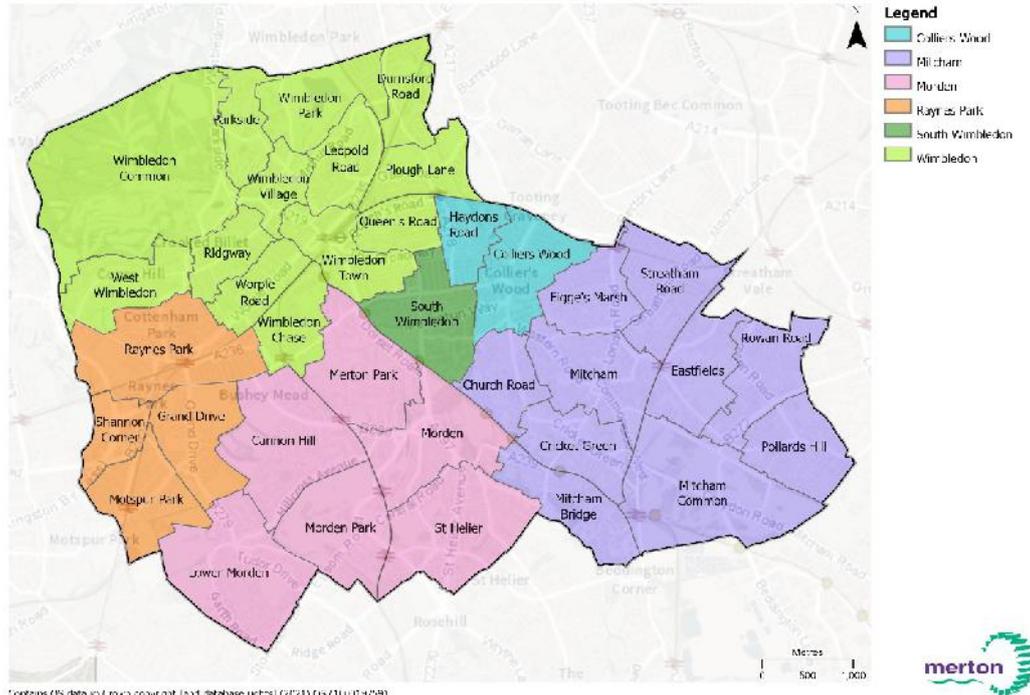
The site is close to the A24 which forms part of the Transport for London Road Network (TLRN) - no new access or servicing should take place from the A24.

This site contains National Grid infrastructure in the form of YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton and underground cable 264681. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The Council will require evidence of liaising with National Grid with any submitted planning application.

	The site location
Impacts Listed Buildings or undesignated heritage assets.	Yes
Impacts a Conservation Area	Yes
Impacts an Archaeological Priority Area	Parts of the site hold a listed structure of Merton Priory wall remnants and are within archaeological priority zones.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, site is within Flood Zones 2 and 3.
Is in a town centre.	Yes
Is in an Opportunity Area	Yes
Impacts a designated open space.	Parts of the site to the south are Metropolitan Open Land and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer.
Impacts on ecology designation.	Parts of the site to the south are Green Corridor and a Site of Importance for Nature Conservation.
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access to public transport.

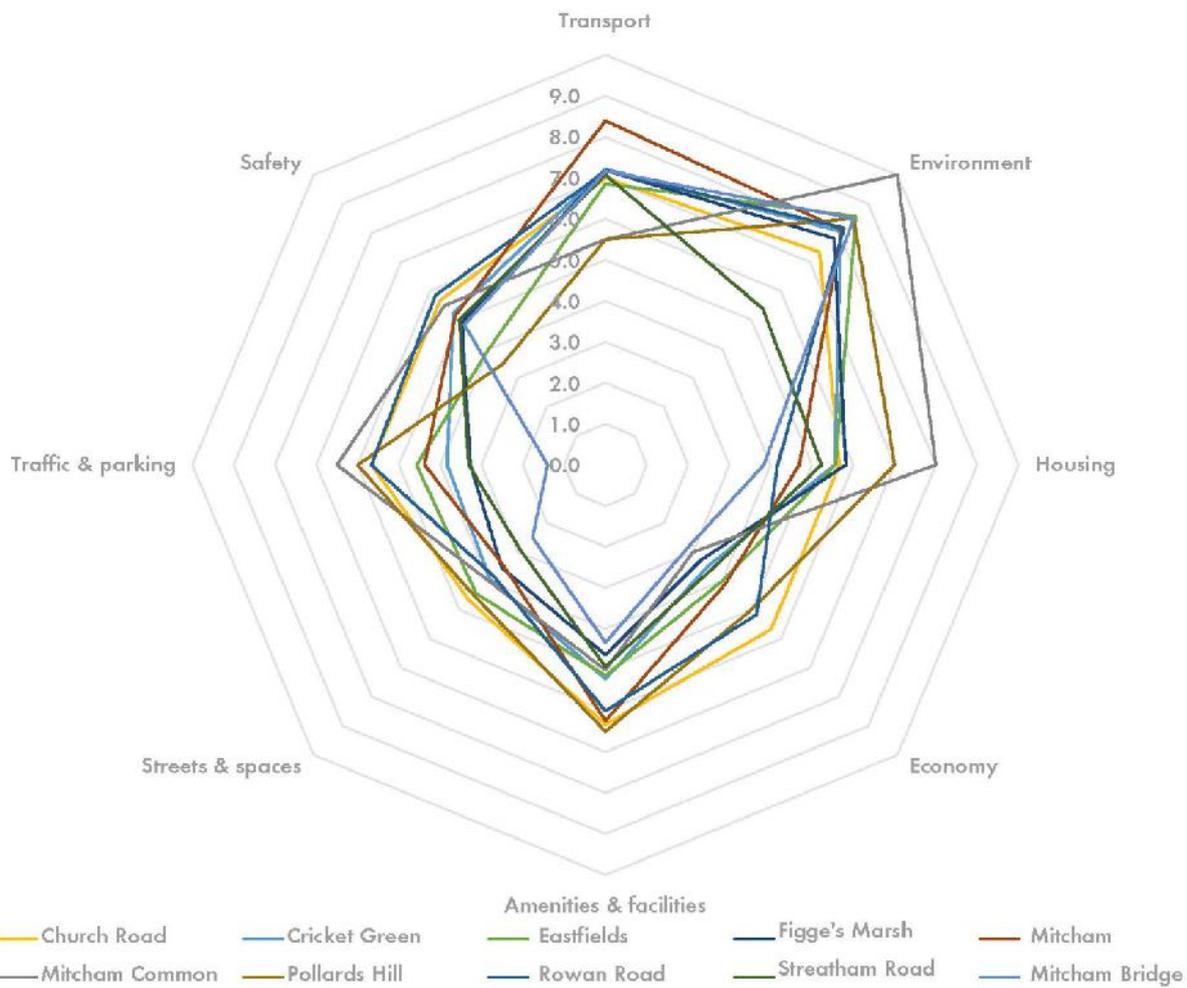


03.2. MITCHAM



PLACE PROFILE: MITCHAM

As part of the Borough’s Character Study, 415 Merton residents took part in an online public survey, of which 98 people lived in Mitcham. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform the Borough Character Study 2021.



Results from residents of Mitcham rating their neighbourhood

KEY OBJECTIVES: MITCHAM

The following objectives provide an overarching vision for Mitcham. More detail can be found in the Policy and Justification sections that follow.



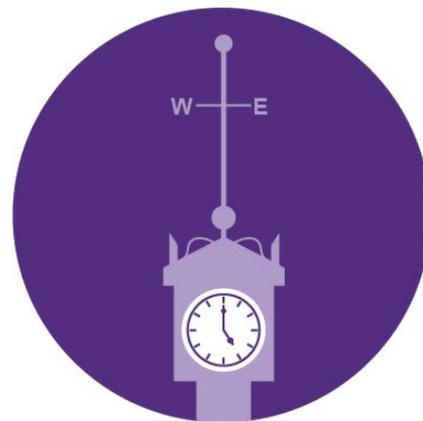
A stronger Mitcham town centre

Improve the environment of Mitcham Town Centre and surrounding areas through high quality design improvements to shop fronts and public spaces and increasing footfall and spend. Improve walking and cycling to and from Mitcham Town Centre.



Supporting community

Mitcham comprises many local parades and open spaces that serve the whole community. Improving Mitcham town centre, local parades, open spaces and the historic environment will help to support communities and reduce inequalities.



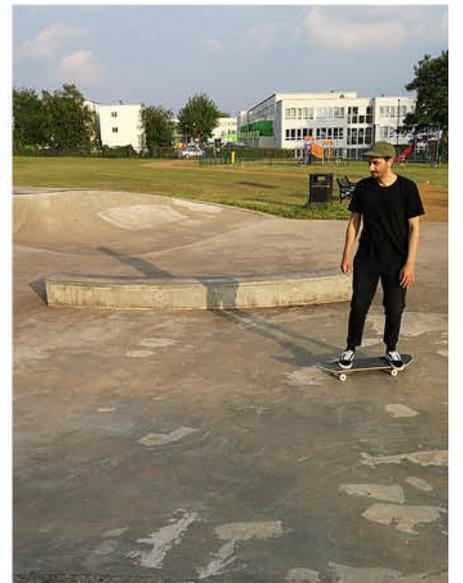
Celebrating heritage

Ensuring that development conserves and enhances the historic environment. For example, around Cricket Green, Canons House and Mitcham Common.

CHARACTER: MITCHAM

These photos illustrate the diverse character found across Mitcham.





MITCHAM: POLICY N3.2

Introduction.

Leading the way with providing award-winning sustainable forms of development such as Brenley Park, Rowan Park and the Y:Cube, and with public realm improvements to the Town Centre and the Cannons, the future of Mitcham focusses on improving wellbeing, supporting local economy and creating sustainable neighbourhoods.

The policies are split into two areas, Mitcham Town Centre and the surrounding areas of Mitcham Town Centre.

Mitcham Town Centre To improve the vitality and overall quality of Mitcham Town Centre, we will:

- a. Increase the footfall and spend in the town centre by improving the quality and diversity of shops and services.
- b. Create healthier streets and spaces that continue to enhance the public realm through high quality streetscape and design improvements using Healthy Streets Approaches.
- c. Improve access to, and movement through, Mitcham town centre by encouraging walking, cycling and public transport that improves links to surrounding neighbourhoods and supports the vision of a 20-minute neighbourhood and improving air quality.
- d. Deliver high quality mixed tenure homes that adds to the vitality of the Town Centre, in particular supporting mixed use developments with homes above shops in the town centre.
- e. Support local and independent businesses, leisure, community and retail outlets that are attractive to and used by the whole community.
- f. Celebrate Mitcham Town Centres unique character by enhancing the setting of heritage assets with high quality design and character led developments.
- g. Improve Mitcham Town Centres unique connection with Mitcham Common, the surrounding green open spaces and public leisure uses.
- h.
- i. Champion sustainable design in future developments to contribute to Merton's net-zero carbon target by 2050.

Surrounding area of Mitcham Town Centre

Mitcham is one of Merton's larger neighbourhoods. Beyond the Town Centre, Mitcham has a rich mix of uses and character that span from Phipps Bridge, Figges Marsh, the Cricket Green and Pollards Hill. To improve the overall environment of Mitcham's surrounding areas by providing quality shopping, housing, community facilities and good transport links, we will:

- j.** Support North Mitcham Local Centre around Tooting rail station: only supporting development that complements or improves the local or wider public realm.
- k.** Improve the quality and mix of homes, including affordable homes.
- l.** Ensure that development conserves and enhances the historic environment and green spaces, encouraging greater usage, for example, around Cricket Green, Canons House and Mitcham Common.
- m.** Enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre.
- n.** Support the regeneration at Pollards Hill to provide good quality new homes and services and refurbish existing homes in a landscaped setting.
- o.** Enhance the connections between Mitcham and surrounding neighbourhoods such as Colliers Wood, Morden and Tooting by improving the public realm and boosting opportunities to walk and cycle through the streets and open spaces around Church Road, Phipps Bridge and Figges Marsh supporting the vision of a 20 minute neighbourhood.
- p.** Make more of underused spaces and places around Mitcham, encouraging investment to improve public access and support greater and more diverse usage, particularly for leisure and recreation.
- q.** Support and improve the quality of local parades.
- r.** Strongly encourage and support sustainable improvements to new and existing developments, in particular to Mitcham's industrial estates and homes.

JUSTIFICATION

- 1.2.1.** The focus for the next 10 years for Mitcham will be to encourage more people to use the town centre for socialising, leisure and shopping. Greater footfall will lead to greater spend, which will help boost local businesses.
- 1.2.2.** Although vacancy rates in Mitcham have generally been low for the past 10 years (lower than average in England and in London), existing businesses report lower spend and therefore less scope to expand, employ more staff, provide new services or refresh their shopfront. In addition, businesses and town centres across the borough need greater trade and more spend to help recover from Covid19.
- 1.2.3.** To boost jobs in Mitcham, the council has been working to make the town centre more attractive and easier to get to and to get around, particularly for people walking, cycling and travelling by public transport. The Mayor and Merton Council's £6million investment in Rediscover Mitcham has transformed the public realm, restored the iconic clock tower, opened the bus lane and helped drive extra footfall to businesses around the Fair Green.
- 1.2.4.** One of the issues identified for the edges of Mitcham town centre is that existing buildings and roads present a barrier to people being able to find their way around the area, particularly by walking and cycling. The 1980s bypass that is now Holborn Way is a clear example, splitting off homes to the west of the town centre from easily accessing it. Other examples include buildings such as Sadler's Close with a built form and site layout that create a physical barrier between the town centre and surrounds. We will require new developments to be laid out to make it easier for people to find their way around and to move around, helping to create attractive streetscape, places to dwell and walking and cycling links to the town centre and through the wider area.
- 1.2.5.** Mitcham town centre has a small proportion of multiple retailers and primarily serves the retail needs of residents living within the east of the borough. The high number of independent retailers and low vacancy rates is one of Mitcham's strengths. However, there are also views of a lack of variety in Mitcham's offer, particularly for people wanting to socialise and the night time economy.
- 1.2.6.** As set out in policies on town centres, many of us visit and use town centres to meet friends and socialise in cafes and restaurants, leisure and entertainment spaces rather than only shopping. Given the pace and scale of change in how we shop and socialise over the last 10 years has been accelerated by Covid19, it is impossible to predict all the changes we might welcome in the next 10 years. This means that the ground floors of commercial

developments need to be flexible to accommodate anything from a soft play area for children to food stalls to flexible offices, while having active, attractive and accessible frontages. The council will support non-residential developments that provide opportunities for people from a wide range of ages, cultures and other characteristics to enjoy.

- 1.2.7.** Mitcham is home to a number of ethnic groups who bring energy and entrepreneurial flair to the community as well as a variety of specialist cultural shops and services which collectively enrich the distinct cultural identities of Mitcham.
- 1.2.8.** Mitcham is located to the east of the borough and is served and connected by rail, tram and bus links; however, the tram stops and train stations are situated at a distance away from the town centre. The council will continue to campaign for increased rail services, particularly at Mitcham Eastfields, and will continue to support the Merton-Sutton Tramlink.
- 1.2.9.** Mitcham is projected to accommodate a range of new homes throughout the plan period. Major development sites include the regeneration of Eastfields and Ravensbury estates. New homes are also proposed at Benedicts Wharf on Hallowfield Way, at Tamworth Lane and a variety of smaller sites across the neighbourhood. In line with the London Plan which prioritises residential development above shops in town centres, the town centre sites will be able to accommodate apartments, providing a contrast to the surrounding terraces and semi-detached houses.
- 1.2.10.** Good quality housing could encourage young professionals into Mitcham bringing increased spending power. More people using the town centre will have knock on social and environmental effects, including greater support for existing local businesses, allowing them to expand and create new jobs. It will also make the centre more attractive to new businesses, providing a wider range of services for residents and workers. Improvements to the business offer, leisure opportunities shops and services will reduce the need for surrounding residents to travel further afield.
- 1.2.11.** To accommodate the significant increase in new housing in Mitcham and the surrounding neighbourhood, in particular from large key development sites, we will also ensure that community services such as education and health meet the needs of existing and new residents. The council has sufficient primary and secondary school places locally and is expanding provision for children with additional needs at Cricket Green School. we will continue to work with the NHS (National Health Service) Clinical Commissioning Group and other partners to protecting and improving the healthcare capacity of the borough currently serviced by Wilson Clinic.

Surrounding neighbourhoods

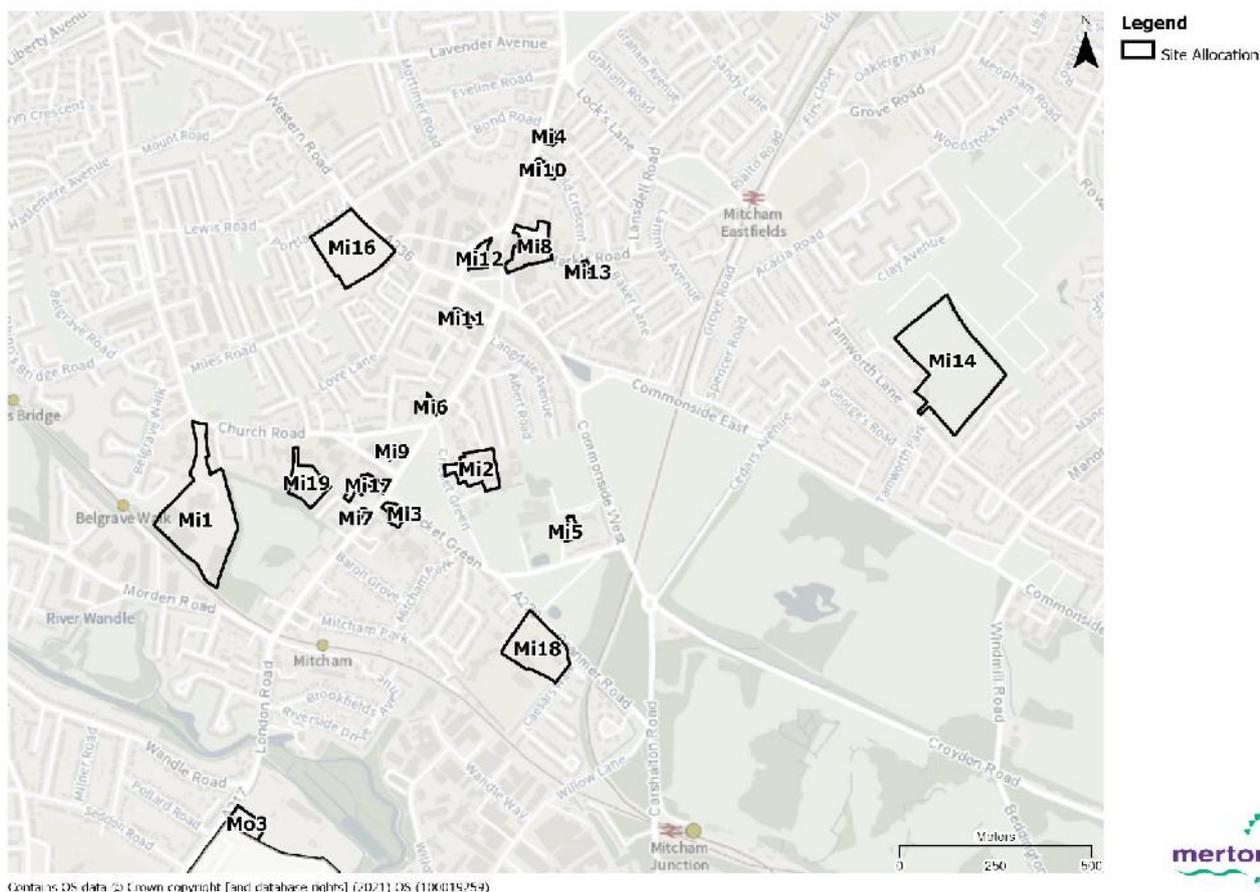
- 1.2.12.** North Mitcham is a reasonably large Local Centre, about 1km north of Mitcham town centre and 1km east of Tooting Broadway underground station. The linear centre has developed around Tooting Rail station at its heart and is bisected by the railway line. It is a key location for residents on the Tooting borders and in the homes surrounding the open spaces at Figges Marsh to avail of shops and services and travel to work. Despite this, the range of shops and the quality of buildings is relatively poor. The council will support proposals that improve the look and feel of the area and provide new services and homes. In particular, the council would support a well-designed redevelopment of the single storey buildings on land lying between Mitcham Road and Links Way to provide homes on upper floors.
- 1.2.13.** Mitcham Cricket Green is an attractive neighbourhood with a wealth of historic assets surrounding Cricket Green, the oldest continuously played cricket pitch in the country. Both historically and today the area has contained a significant number of civic functions, often in purpose-built buildings. There are a number of key sites within or on the borders of Cricket Green that are proposed for redevelopment to provide new homes; these should be laid out to improve legibility and permeability within the area and sensitively designed to complement the heritage assets.
- 1.2.14.** The Canons House and grounds is an attractive historic landscape but has not been well used or much known outside the Mitcham Cricket Green area. The Canons Heritage Lottery Fund Parks for People” project is to shine a spotlight on this underplayed and underused landscape. The project aims to increase footfall and visibility of the Canons House and Grounds to be a better used asset for Mitcham.
- 1.2.15.** Homes and businesses at Church Road and Phipps Bridge lie between the town centres of Mitcham, Colliers Wood and Morden. Local roads can be congested and there is potential to improve the look and feel of these areas and at the same time improve the experience for walkers and cyclists. Wherever possible developments should support public realm improvements. Large development sites should be permeable to help improve public access for walking and cycling, helping to link the green spaces along the Wandle Trail, between Morden Hall Park, Ravensbury Park, London Road Playing Fields, Cricket Green, The Canons, Mitcham Common through to Rowan Park and Pollards Hill. This will help make it easier for people to get around, whether for work, leisure, or recreation, will have associated wellbeing benefits. Additional footfall could help support local businesses.
- 1.2.16.** Like Wimbledon, Mitcham also has a rich sporting environment and recreational opportunities although these are unfortunately less well known. The Canons Running Track, Mitcham Cricket Club, Tooting and Mitcham Hub, the Merton Mile and green gym at Figges

Marsh and the grassroots football games on Mitcham Common are just some of the sporting opportunities locally. We will support proposals that provide long term, resilient investment in sports and recreation for the benefit of local communities, opening up private land to public access for sport and recreation, providing local job and training opportunities and supporting all of Mitcham's diverse communities.

Site Allocations

Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocations will be determined against planning polices (including the London Plan).



SITE Mi1: Benedict Wharf, Hallowfield Way, Mitcham, CR4 3BT.



Ward: Cricket Green

Site description: Most of the site is used for waste management purposes by the owner occupier Suez. A small part of the site (rectangle in the north-western corner) is owned by Cappagh and is used as the car pound for Wandsworth and Lambeth traffic enforcement.

The single operational site entrance is from the north down a short wide single access road, Hollowfield Way, off Church Road. Vehicles entering the site must pass Benedict Primary school, St Peter and St Paul's church and graveyard and residential properties, all of which are found at the junction of Hollowfield Way and Church Road. There is also a secondary road access down Church Path, a narrow residential street lined with historic two-storey cottages, but this is currently closed off by Suez while the site is in waste management use.

To the north of the site, beyond Cappagh's car pound boundary, lies White Bridge Avenue, a residential road and Benedict Primary School. Morden Hall Park, a historic park owned by the National Trust, lies circa 200m to the northeast of the site boundary. To the west of the site boundary lies Barons Walk, a fenced off path and beyond lies London Road playing fields.

The Wimbledon-Croydon tramline lies adjacent to the southwestern boundary of the site. Belgrave Walk tram stop is within 5 minutes' walk (300m) of the site's northeast corner with services between Wimbledon and Croydon; At the other side of the tramline are large industrial sheds.

Large electricity pylons lie just beyond the site boundary, with electricity wires running circa 30 metres above ground parallel with the tram tracks.

Site owner: Suez (site 3.8ha), Cappagh (site 0.6 ha), to the north of the site is a strip of land owned by the London Borough of Merton.

Site area: 4.4 hectares (main Suez owned site 3.8ha; rectangular Cappagh site 0.6 hectares)

Existing uses: Waste facility with planning permission for expansion (majority of site); car pound for Wandsworth and Lambeth councils (rectangular northern part of site)

Site allocation: Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable. Reallocation is dependent on there being no loss of waste management capacity within the South London Waste Plan area.

Merton Council will only support reallocation where the waste management capacity and function are moved within the South London Waste Plan area.

Development of the site is an opportunity to provide much needed new homes and other compatible uses in a largely residential setting with surrounding infrastructure and minimise HGV (Heavy Goods Vehicle) and other heavy traffic and attributed to the waste management use of the site and minimise the associated road-based noise and air pollution.

Site deliverability: 5- 10 years.

Indicative site capacity (new homes): 650-850 new homes.

Further information: The site is safeguarded as an existing waste management site in Schedule 1 of the adopted (2012) [South London Waste Plan unless](#) replacement compensatory provision is provided.

Suez has acquired a site in Sutton, a South London Waste Plan partner borough, and has secured planning permission for a replacement waste management facility that will exceed the required replacement compensatory provision.

The [draft South London Waste Plan](#) 2021-2036, which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and will shortly be submitted to the Secretary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.

On 18 June 2020, Merton's Planning Applications Committee resolved to refuse outline planning

permission ([19/P2383](#)) for the development of 850 dwellings and 750sqm of commercial floor space on the site. On 3 August 2020, the Mayor of London decided to take over the application for determination and on 8th December 2020 the Deputy Mayor of London resolved to approve the application subject to the completion of a Section 106 agreement. This is due to be completed in 2021.

Design and accessibility guidance:

Development proposals for any use would be required to address the national and local planning policies relating to heritage assets, environmental protection and nearby sensitive development. In this case, the council supports the removal of SIL capacity from this site to elsewhere in the South London Waste Plan area as the proximity of so many sensitive land uses, directly adjacent or near the site is not compatible with viable long-term strategic industrial development. Decontamination will be required due to the site's historic uses.

The overhead power lines supported by electricity pylons influence the layout, scale, massing and potential uses of new development on parts of the site.

Development proposals must mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Development proposals must protect the amenity of the adjacent properties, including the nearby homes and schools.

The site must provide sustainable drainage measures throughout the development.

Neighbourhood and heritage considerations

Development proposals must enhance the design and streetscape in the setting of the Wandle Valley Regional Park and Mitcham Cricket Green conservation area.

Development proposal must provide public realm improvements along Hallowfield Way, reducing the width and improving the frontage, enhancing the setting of the Grade II* St Peter and St Paul's Church and Benedict Primary school, thus delivering some of the actions from the Mitcham Cricket Green conservation area character appraisal and action plan.

Development proposals must preserve and enhance and not cause significant harm to heritage assets including the character of Mitcham Cricket Green Conservation area, the nationally and locally listed buildings and the historic park and garden.

Development proposals must be sensitive to the following:

- Benedict Primary School lies opposite the church adjoining the site entrance at Hallowfield Way. Melrose School (for secondary school aged children with social, emotional and behavioural difficulties) and Cricket Green School (a special educational needs school for 4-19-year-olds) are both within 300m of the site, adjacent the London Road playing fields.
- Residential streets within 100m of the site include Church Path, White Bridge Avenue, Belgrave Walk and the nearby Cherry Trees estate.
- Respect and not cause significant harm to heritage assets including the character of Mitcham Cricket Green Conservation area, the nationally and locally listed buildings and the historic park and garden.

Improving walking, cycling and access:

Development proposals must improve public access through the area and increase permeability, including via Barons Walk and between London Road playing fields and the site.

The site is bounded by Baron Walk to the east and Ravensbury Path to the west (both Public Rights of Way) that provides access to Belgrave Walk Tram stop and over the tram tracks to Morden Road. Development proposals must fully protect and enhance these routes and maximise the permeability of

the site for pedestrians and cyclists by providing and contributing to new routes and connections including into London Road playing fields.

Development proposals must support walking and cycling links between the green spaces at Morden Hall Park, London Road Playing Fields and enhance the Wandle Valley Regional Park.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan 2021 and Green Infrastructure Study 2020 and contribute to access improvements with London Road Playing Fields.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Development proposals must consider the existing Wimbledon-Croydon tramline on the western boundary of the site, mitigation of any safety and security impacts and improve access from the site to the tram stop.

The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.

The scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> Merton Council will engage with and seek advice from Thames Water about any development proposals on this site.

The site is adjacent to tram tracks, the developer must consultation with London Trams. The council will require evidence of engagement with London Trams with any submitted planning application. Merton Council will also consult with and seek advice from London Trams about the development of this site.

Electricity cables, supported by two pylons just beyond the site boundaries, run parallel with the tramlines. This is National Grid infrastructure in the form of YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer engage with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of engagement with National Grid with any submitted planning application.

The site location	
Approach to tall buildings	The size of the site allows for a masterplanned approach which could contain taller buildings.
Impacts an Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is susceptible to surface flooding.

Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	The site is within the Wandle Valley Regional Park and is adjacent to London Road Playing Fields, designated as open space.
Impacts on ecology designations.	<p>London Road Playing Fields running along the entire eastern side of the site, is designated as a Site of Importance for Nature Conservation and as a green corridor for wildlife protection.</p> <p>Nearby Morden Hall Park is designated as Metropolitan Open Land, a Site for Importance for Nature Conservation, as green corridor.</p>
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mi2: Birches Close, Mitcham, CR4 4LA.



Ward: Cricket Green
Site description: The site, which takes access from Cricket Green, consists of various single and two-storey buildings accommodating specialist NHS clinics and supported accommodation units. To the north, on the opposite side of the Cold Blows footpath is a three-storey former office since converted into flats and three-storey blocks of flats. To the east of the site is a single storey nursing home and to the south is a bowling green, the Methodist Church and a row of two-storey terrace houses. To the west is a row of two and three-storey detached and semi-detached houses.
Site owner: National Health Property Service (NHPS)
Site area: 0.97ha
Existing uses: Healthcare
Site allocation: Healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in Mitcham.
Site deliverability: Delivery: 5-10 years
Indicative site capacity (new homes): 35-54 new homes
Design and accessibility guidance: Opportunities arising from the site size and location for exemplary urban design either delivering either

healthcare or sustainable homes, complimenting the heritage assets and historic character of the area, while protecting the residential amenity or the adjacent properties.

Development proposals must improve walking and cycling links to, from and around the site. Access to the nearby green spaces and heritage assets should be promoted through a development proposal.

Development proposals must preserve and enhance the Cold Blows footpath along the northern boundary.

Investigating the potential impact of any proposed development on archaeological heritage. Locally listed Birches House to be retained as part of any development proposal.

Development proposals must improve the connectivity of the site - ensuring the layout of buildings and spaces within the site provides accessibility to London Road and the town centre and The Canons House and its grounds.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area.

Infrastructure requirements

To ensure that healthcare provision is delivered in this area and that there is no loss of potential NHS sites until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital or Birches Close sites.

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, The White House, 'Cricket Green, and 'Chestnut Cottage', Cricket Green, both Grade II listed buildings, are to be preserved. The Birches (a.k.a. 'Birches House') is a Locally Listed building.
Impacts a Conservation Area	Yes
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impact from flooding from all sources	Portions of the north, east and west of the site are within a Critical Drainage Area.
Is in a town centre.	No
Is in an Opportunity Area	No

Impacts a designated open space.	Yes. The site is within the Wandle Valley Regional Park 400m buffer. Opposite the site is Metropolitan Open Land and Mitcham Cricket Green Open Space which also forms part of the Wandle Valley Regional Park.
Impacts on ecology designation.	Yes. Mitcham Cricket Green is a Green Corridor.
Public Transport Accessibility Level (PTAL)	PTAL 4, good access to public transport.

SITE Mi3: Burn Bullock and Mitcham Cricket Pavilion 315 London Road, Mitcham, CR4 4LA.



Ward: Cricket Green

Site description: The site is occupied by two distinct uses. On the junction of London Road and Cricket Green sits the two storey Burn Bullock public house (currently closed) with associated car park. On the part of the site that faces Cricket Green is a two-storey red brick and wood building, currently in use as a Cricket Pavilion serving the cricket club on Cricket Green.

The site faces the open space at Mitcham Cricket Green to the northeast. The adjacent property to the Burn Bullock fronting London Road to the west is the three storey Jobcentre Plus. Next to the Cricket Pavilion on Cricket Green is a two-storey dwelling house.

The cricket pavilion built around 1920 and the associated land and building is the only dedicated facility supporting the playing of cricket on Mitcham Cricket Green.

Mitcham Cricket Green is recognised as one of the oldest cricket grounds in the world where cricket has been consistently played since at least 1685.

Site owner: Private ownership - (Site allocation suggested by Mitcham Cricket Green Community and Heritage)

Site area: 0.24ha
Existing uses: Public house (currently closed) car park, cricket pavilion.
Site allocation: Secure community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion and restoration of the Burn Bullock supported by enabling development. Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green. Use of the Burn Bullock building as non-residential uses with public access on the ground floor which could include business, service or community uses. Residential development may be acceptable on upper floors as enabling development. Residential development on the car park to the rear of the site to enable community ownership and management of Mitcham Cricket Pavilion associated land and buildings.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 5-12 new homes - on parts of the site not including the Cricket Pavilion, storage shed and lower floor of the Burn Bullock.
Design and accessibility guidance: The cricket pavilion is registered as an Asset of Community Value. The council is looking to secure the long-term future community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion to help the continuation of cricket being played on the Green. This would be helped by enabling development on the former car park within the site. Opportunity to secure ownership and improvements to Mitcham Cricket Pavilion directly associated with the active operation of cricket playing on the historic town green at Mitcham Cricket Green. Development of the site is an opportunity for enabling development to support restoration of Burn Bullock Opportunity to bring an underused site at the Burn Bullock back into use. Opportunity to secure long term community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion and restoration of the Burn Bullock supported by enabling development. Development proposals will be required to secure the restoration of the listed Burn Bullock public house and its removal from the “Heritage at Risk” register. Development appropriate to the residential setting that supports public access to the ground floor of the Grade II listed Burn Bullock would be supported. Development on the car park to the rear of the site to enable community ownership and management of Mitcham Cricket Pavilion associated land and buildings. Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green. Development proposals must be delicately designed to conserve and enhance the significance of the heritage assets and the views from Metropolitan Open Land.
Infrastructure requirements: Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan 2021, Green Infrastructure Study 2020 and Playing Pitch Strategy 2019.

Development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek advice from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	<p>Burn Bullock Public House is a Grade II listed building and is on the national “Heritage at Risk” list.</p> <p>The cricket pavilion is locally listed.</p> <p>Other historic assets in the vicinity of the site include the White Hart (Grade II listed), drinking fountain & horse trough (Grade II listed), 346-348 London Road (Grade II listed).</p> <p>The cricket pavilion built around 1920, and associated land / building is the only dedicated facility supporting cricket playing on Mitcham Cricket Green.</p> <p>The cricket pavilion is registered as an Asset of Community Value.</p>
Impacts a Conservation Area	Yes
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes. The site is within the 400m buffer of Wandle Valley Regional Park. Registered town green hosting an operational cricket pitch. Mitcham Cricket Green is Metropolitan Open Land, designed Open Space and within the Wandle Valley Regional Park.
Impacts on ecology designation.	Yes. Mitcham Cricket Green is a Green Corridor.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mi4: Elm Nursery Car Park 210 London Road, Mitcham, CR4 3TA



Ward: Figges Marsh

Site description: This site is a publicly accessible surface car park. Adjacent the northern boundary is a single storey commercial unit; a public access footpath lies between the commercial unit and the car park. Adjacent the southern boundary are flats ranging from three to five storeys to the west (on the opposite side of London Road) are four storey flats and to the east are two storey terraced houses. The site is not within the Mitcham town centre boundary. The site is accessed from London Road with pedestrian access also to Feltham Road.

Site owner: Merton Council

Site area: 0.1ha

Existing uses: Car Park

Site allocation: Residential

Site deliverability: 0-5 years

Indicative site capacity (new homes): 10-21 new homes.

Design and accessibility guidance:

On 16th July 2020 planning permission (19/P4047) was resolved to be granted for residential development on this site subject to the completion of any enabling agreement and conditions.

Development of the site is an opportunity to deliver new homes in an accessible setting and to provided connections to the streets lying to the east of the site.

Development proposals must mitigate potential parking, traffic and road safety impact on neighbouring streets and local amenity.

Development proposals must protect the residential amenity of those properties adjacent to or in the vicinity of the site.

The public access footpath should be protected and enhanced.

Infrastructure requirements:

The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

This site is located in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

Development proposals for this site must have regard to Merton’s Infrastructure Delivery Plan.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, Area is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 4, good access to public transport.

SITE Mi5: Land at Canons Madeira Road, Mitcham, CR4 4HD



Ward: Cricket Green

Site description:

The site is vacant, vegetated land surrounding a residential dwelling set back circa 50 metres from the public highway and not visible from it. A high wall surrounds much of the site to the west, with boundary fencing on all other sides.

To the west of the site is the car park associated with Canons Leisure Centre, Canons House and its grounds. To the northwest of the site is Canons Leisure Centre. Canons Recreation Ground, including a children’s playground is visible to the northern boundary of the site. To the east of the site is a restaurant behind residential properties, which front Commonsie West. Beyond that is Mitcham Common.

The rear gardens of semi-detached properties fronting Madeira Road bound the site to the south.

Site owner: Merton Council

Site area: 0.16ha

Existing uses: Vacant

Site allocation: Residential

Site deliverability: 0-5 years.

Indicative site capacity (new homes): 5-12 new homes

Design and accessibility guidance:

On 16th July 2020 planning permission (19/P4050) was resolved to be granted for residential development on this site subject to the completion of any enabling agreement and conditions.

Development proposals need to be sympathetic to the historic setting, particularly of Canons House and the views from the nearby Metropolitan Open Land.

Development proposals must protect the amenity of adjacent residential occupiers.

Access to the site is limited to the existing access from the north of the site via Commonsides West and in front of Park Place.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, historic assets within the surrounding area include the Grade II* listed Canons House and the Grade II listed Dovecote.
Impacts a Conservation Area	Yes
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, Canon Recreation Ground and the site is within Wandle Valley Regional Park.
Impacts on ecology designation.	Metropolitan Open Land, Site of Importance for Nature Conservation and several Green Corridors close to the site.
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

SITE Mi6: 326 and 328 London Road, Mitcham CR4



<p>Ward: Cricket Green</p>
<p>Site description: At 326 London Road is a three-storey double fronted Victorian building with parking spaces in front and a garden to the rear. The neighbouring 328 London Road is a single storey, pitch roofed, office building with parking spaces in front. Both buildings are set back from the road and have significant natural barriers from large trees on the London Road boundary. The area is characterised by mansion blocks of apartments such as Glebe Court. The site is currently in use as Mitcham Citizens Advice Bureau and community meeting space.</p>
<p>Site owner: Merton Council</p>
<p>Site area: 0.13ha.</p>
<p>Existing uses: Offices (Mitcham Citizens Advice Bureau (CAB) and community meeting space</p>
<p>Site allocation: Residential if, the office and community functions are provided elsewhere locally. Residential use would be dependent on the office and community use being re-provided locally.</p>
<p>Site deliverability: 5-10 years</p>
<p>Indicative site capacity (new homes): 5-12 new homes</p>
<p>Design and accessibility guidance: Site provides an opportunity to provide new homes sensitive to the local heritage assets.</p> <p>Development proposals must recognise the site’s close proximity to Grade II Elm Lodge and structures, Grade II milestone and heritage assets near the site and must consider the setting of</p>

heritage assets.

Development proposals must enhance the frontage on London Road, respecting the character of this part of the conservation area and the setting of the listed buildings and protect the residential amenity of the adjacent properties.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

Development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Yes. Grade II Elm Lodge and structures, Grade II milestone.
Impacts a Conservation Area	Yes.
Impacts an Archaeological Priority Area	Yes. Mitcham Village Archaeological Priority Zone (APZ)
Impacts a Scheduled Ancient Monument	No.
Impacts on flooding from all sources.	No.
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Site adjacent to open space
Impacts on ecology designation.	Site of Interest for Nature Conservation (SINC) and green corridors.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport, however 5 – 8 minutes’ walk to the town centre.

SITE Mi7: 370 London Road Mitcham, Mitcham, CR4 3ND



Ward: Cricket Green

Site description: Area of vacant land facing London Road, currently used as outdoor car wash. Parade of shops with flats above adjacent to the southwest of the site and residential street with two-storey houses to the north of the site

Site owner: Private owner

Site area: 0.04ha

Existing uses: Outdoor car wash

Site allocation: Mixed used non-residential (shops, services, offices, community on the ground floor and residential on upper floors).

Site deliverability: The site was not proposed by the landowner, which could delay the delivery of the site).

Indicative site capacity (new homes): 5 -8 new homes

Design and accessibility guidance:

To provide new homes sensitive to the heritage assets and historic setting and character.

Development proposal will need to enhance the frontage on London Road, while enhancing the character of this part of the conservation area and the setting of the listed buildings.

Development proposal will need to protect the residential amenity of the adjacent properties.

Positive use of empty site with active frontage to London Road strengthening and extending local retail parade. Height to be guided by context of buildings over shops running along London Road to south west and the proposed development at 360-364 London Road. Opportunity for small site provision of new homes.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

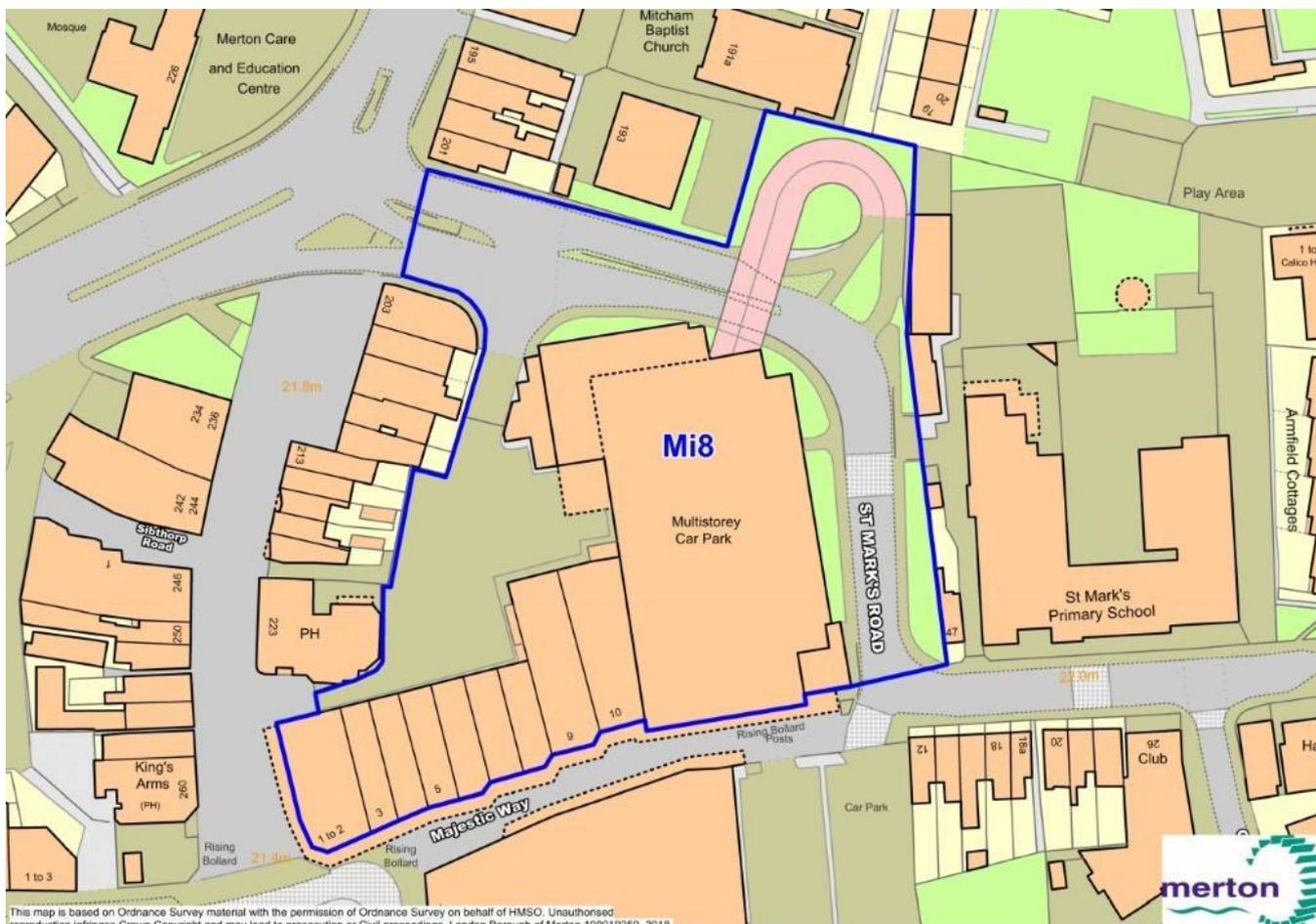
Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

There is a bus stop fronting the site which should be protected or appropriately relocated in discussion with Transport for London.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Adjacent to designated open space, setting of listed building (Grade II Elm Lodge) and structures (Grade II milestone)
Impacts a Conservation Area	Yes, the Mitcham Cricket Green Conservation Area
Impacts an Archaeological Priority Area	Yes, Mitcham Village Archaeological Priority Zone (APZ) The site is in an archaeological priority area and within the Wandle Valley Regional Park boundary.
Impacts a Scheduled Ancient Monument	No
In a Flood Zone	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts ecological designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 3 moderate access to public transport however, within 5 minutes' walk of Mitcham town centre.

SITE Mi8: 1 to 12 Majestic Way, Mitcham, CR4 2JS.



Ward: Figges Marsh

Site description: The site lies within Mitcham town centre and consists of a series of 11 purpose built commercial with their main frontage onto Majestic Way and access for deliveries from St Mark's Road to the rear.

These units include Poundland, Lloyds bank, Scope and the largest of these is Morrison's supermarket.

A multi-storey car park accessed from St Mark's Road is leased to Merton Council. A part of the site currently used as the ramp for access to the multi storey car park lies to the north of St Mark's Road.

The site has road frontage on three sides but currently only active shop frontage on Majestic Way aside from Unit 1 which has dual aspect frontage onto Majestic Way and London Road bus lane.

The site is 8 - 10-minute walk to Mitcham Eastfields station and trains to London Victoria and Blackfriars, Sutton and Epsom.

The landowner says that the existing retail accommodation is let on short leases. The multi storey car park is let to Merton Council. During construction, a significant and prominent element of commercial floorspace at the heart of Mitcham town centre would not be available.

Site owner: Appleby

Site area: 1ha
Existing uses: Mixed uses: residential, retail, office community and car park.
Site allocation: Mixed use: retail, businesses, food and drink and community services (health centres, crèches, day nurseries, day centre on the ground floors, residential on upper floors.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 60 -160 new homes
<p>Design and accessibility guidance: The site provides an opportunity to modernise and revitalise the town centre by supplying new homes and increase business floorspace in an accessible area.</p> <p>Proposal must contribute to the increasing the footfall, the local economy and support the vitality and sustainability of Mitcham town centre.</p> <p>Mitigation measures are needed during the construction phase to minimise disruption to Mitcham Fair Green, London Road bus lane Mitcham market, St Mark's Road and nearby school and the surrounding businesses.</p> <p>Development proposals design and building must make an attractive and significant contribution to improving the look and feel of the whole town centre and Fair Green. In addition, be sensitive to Mitcham town centre landmark namely the clock tower.</p> <p>Development proposals must provide an active frontage along St Marks's Road, adding vitality and safety of the area.</p> <p>Development must give careful consideration to the impact on all transport modes in the surrounding area. The development should be designed in accordance with the Healthy Streets Approach and should enhance active travel and public transport connections in the area. During the construction phase for this site negative transport, delivery and servicing impacts should be minimised and mitigated, giving priority to active modes and bus operations.</p> <p>Development may be required to include a secure cycle storage facility (hub) for wider public access.</p> <p>The site is adjacent to the London Road bus lane, any negative impacts on bus operations, including during construction, should be minimised and mitigation provided.</p>
<p>Infrastructure Requirements:</p> <p>Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.</p> <p>Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.</p> <p>This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.</p> <p>The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.</p> <p>Thames Water does not envisage infrastructure concerns about the water supply network</p>

infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	The clock tower on Fair Green Grade II listed.
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Yes, two Archaeological Priority Zones
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	Yes
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, within the Wandle Valley Regional Park and designated open space to the north of the site.
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access to public transport.

SITE Mi9: Former Mitcham Fire Station 30 Lower Green West, Mitcham, CR4 3AF.



Ward: Cricket Green

Site description: This site is a 2-3 storey building (fire station) set in a group of buildings, including 3-4 storey Vestry Hall next to the rear of the site (northeast) and the Cricketers pub site, which is currently being redeveloped, next to the southeast of the site. Next to the northwest of the site is triangular open space known as Lower Green. The site fronts Lower Green Road. Cricket Green (recreational open space) lies to the southeast of the group of buildings, across London Road from Vestry Hall and is close to a war memorial.

Site owner: London Fire Brigade

Site area: 0.04ha

Existing uses: Former fire station

Site allocation: A mix of uses which could include any of the following: community uses (Clinics, health centres, crèches, day nurseries, day centre), other community uses such as a cinema, gallery, theatre; residential, restaurant/café, office, drinking establishment or non-food retail.

Site deliverability: 0-5 years

Indicative site capacity (new homes): 1-4 new homes.

Design and accessibility guidance:

Any redevelopment or change of use should keep the building and design should be sensitive to its form and function. Recognise physical and functional relationship with neighbouring Vestry Hall.

Mitcham Cricket Green Conservation Area Character Assessment and management plan should also

inform any design considerations. The size, layout and location of the building would merit its consideration for community uses, subject to delivery.

Mitigate potential parking, traffic and road safety impacts on neighbouring street and local amenity. Investigating the potential impact of any proposed development on archaeological heritage.

Development should improve the cycle and pedestrian connections to this island site, which could be through enhancing access to Public Right of Way 187 to the rear of Vestry Hall.

Infrastructure Requirements

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

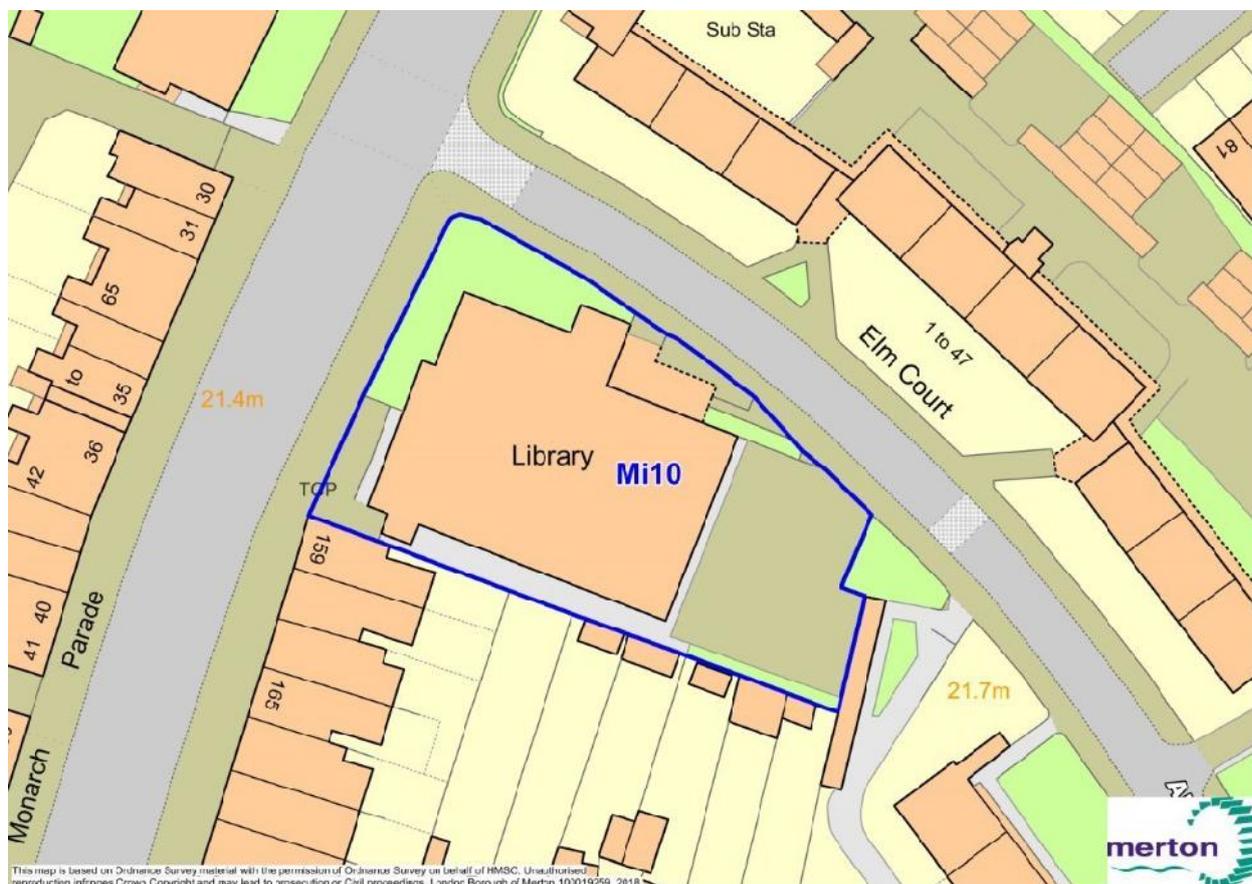
Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes, Mitcham Parish Rooms, to the west of the site is a Grade II statutory listed building. The Burn Bullock public house across the junction to the south of the site is Grade II listed.
Impacts a Conservation Area	Yes.
Impacts an Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No.
Impacts flooding from all sources.	Yes, area is susceptible to surface water flooding.
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Yes.
Impacts on ecology designation.	Yes, the triangular open space to the northeast of the site is designated as Metropolitan Open Land, Green Corridor and Green Chain
Public Transport Accessibility Level (PTAL)	PTAL 4 good access to public transport.

SITE Mi10: Mitcham Library, London Road, Mitcham, CR4 2YR



Ward: Figges Marsh

Site description:

This site holds a two-storey library and community facility with a car park found to the east of the building. The site is surrounded by buildings ranging between two and five storeys in height that consist of blocks of flats and retail parades. The site fronts London Road.

Site owner: Merton Council

Site area: 0.18ha

Existing uses: Library

Site allocation: Library to be kept and improved (either on site or closer to Mitcham town centre). The rest of the site considered for a suitable mix or any of community uses, office or residential.

Site deliverability: 5-10 years

Indicative site capacity (new homes): 20-30 new homes

Design and accessibility guidance:

A library to be kept either on site or closer to Mitcham town centre. If residential elements are considered, these should be found on upper floors or set back from the frontage with London Road. Access to a library and the services it provides, for the local community is an important asset which helps to address, income, education and training inequalities.

Development must increase the customer service area to increase Mitcham library facility and service, provide more adaptable and suitable modern space for the local community.

Development proposals must respect the character of the locally listed building.

Development proposals must mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Investigation of the potential impact of any proposed development on archaeological heritage must be carried out.

Development proposals must incorporate sustainable drainage measure within the design and layout.

Infrastructure Requirements

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

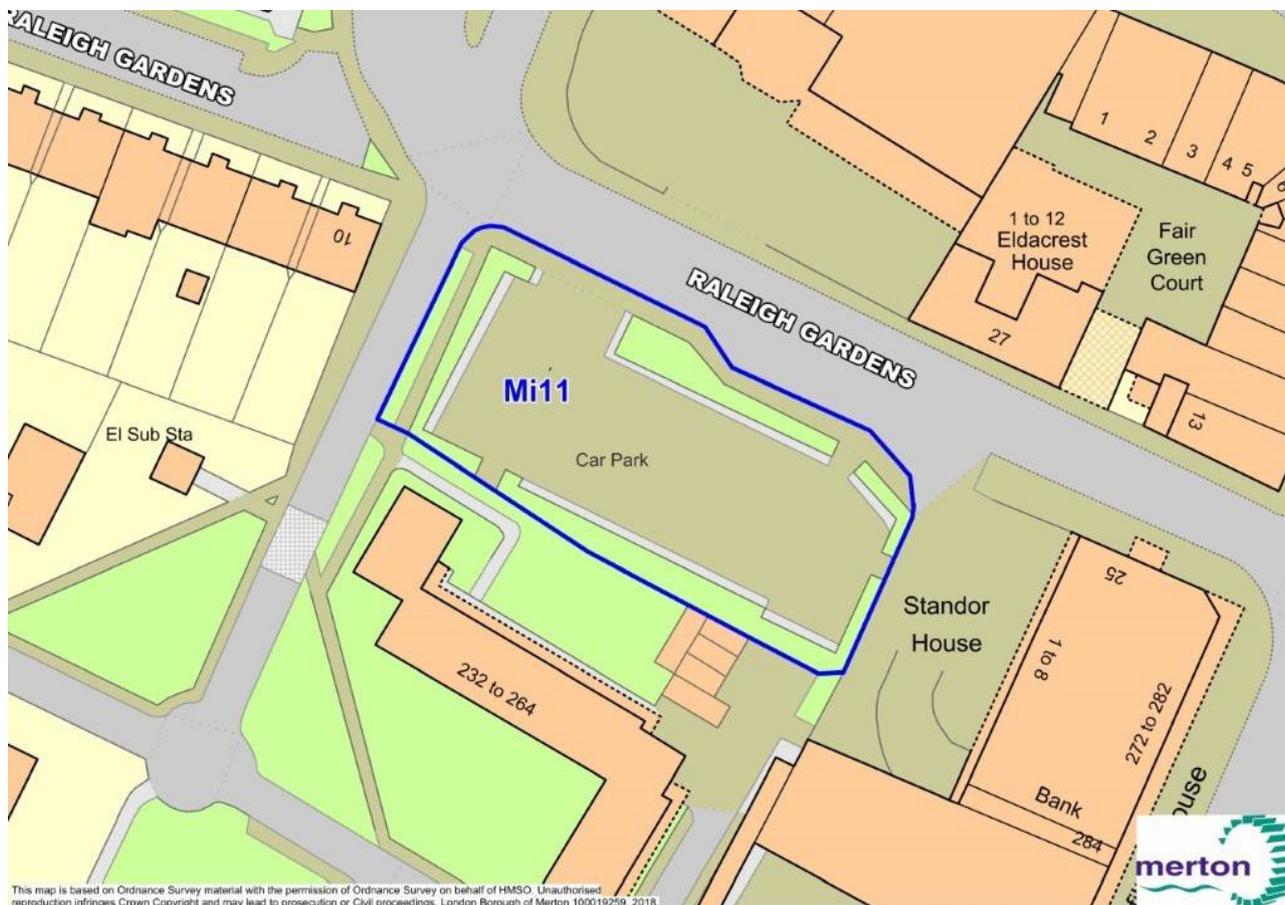
This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Yes. The original pitched roof library building is locally listed but not the more modern flat roofed side and rear extensions.
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Area is susceptible to surface water flooding.
Is in a town centre.	No. The site is 5-minute walk away to the town centre (boundary)
Is in an Opportunity Area	No
Impacts a designated open space.	Figges Marsh open space is approx. 5-

	10 minutes walk from the library.
Impacts on ecology designation.	No.
Public Transport Accessibility Level (PTAL).	PTAL 4 good access to public transport.

Site Mi11: Raleigh Gardens car park, Raleigh Gardens, Mitcham, CR4 3NS



Ward: Figges Marsh

Site description: The site is a small surface public car park.

To the southeast of the site is the parking and service area of Standor House, a two to four storey building with retail uses at ground level and offices above.

To the south of the site is a five-storey block of flats and beyond the access road to the west of the site is the flank wall of a two-storey end-of terrace house.

To the north of the site, on the opposite side of Raleigh Gardens, is the parking and services area for the three storey buildings that face Upper Green West. To the northwest of the site is a two-storey retail building. Residential terraces continue along Raleigh Gardens to the west.

Site owner: Merton Council

Site area: 0.11ha

Existing uses: Car Park

Site allocation: Residential

Deliverability: 0-5 years

Indicative site capacity (new homes): 30 – 40 new home.

Design and accessibility guidance:

On 16th July 2020 planning permission (19/P4048) was granted for residential development on this site subject to the completion of any enabling agreement and conditions.

Development proposals must supply new homes on an accessible brownfield site and provide active ground level and with front doors opening onto the street wherever possible.

Development proposals must mitigate parking/servicing impacts on neighbouring streets.

Development proposals must incorporate sustainable drainage measures.

Development proposals should explore the potential to supply site access via adjacent side road.

Development will need to protect the residential amenity of adjoining properties to the rear.

Development must respond positively to keeping established building lines on Raleigh Gardens.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

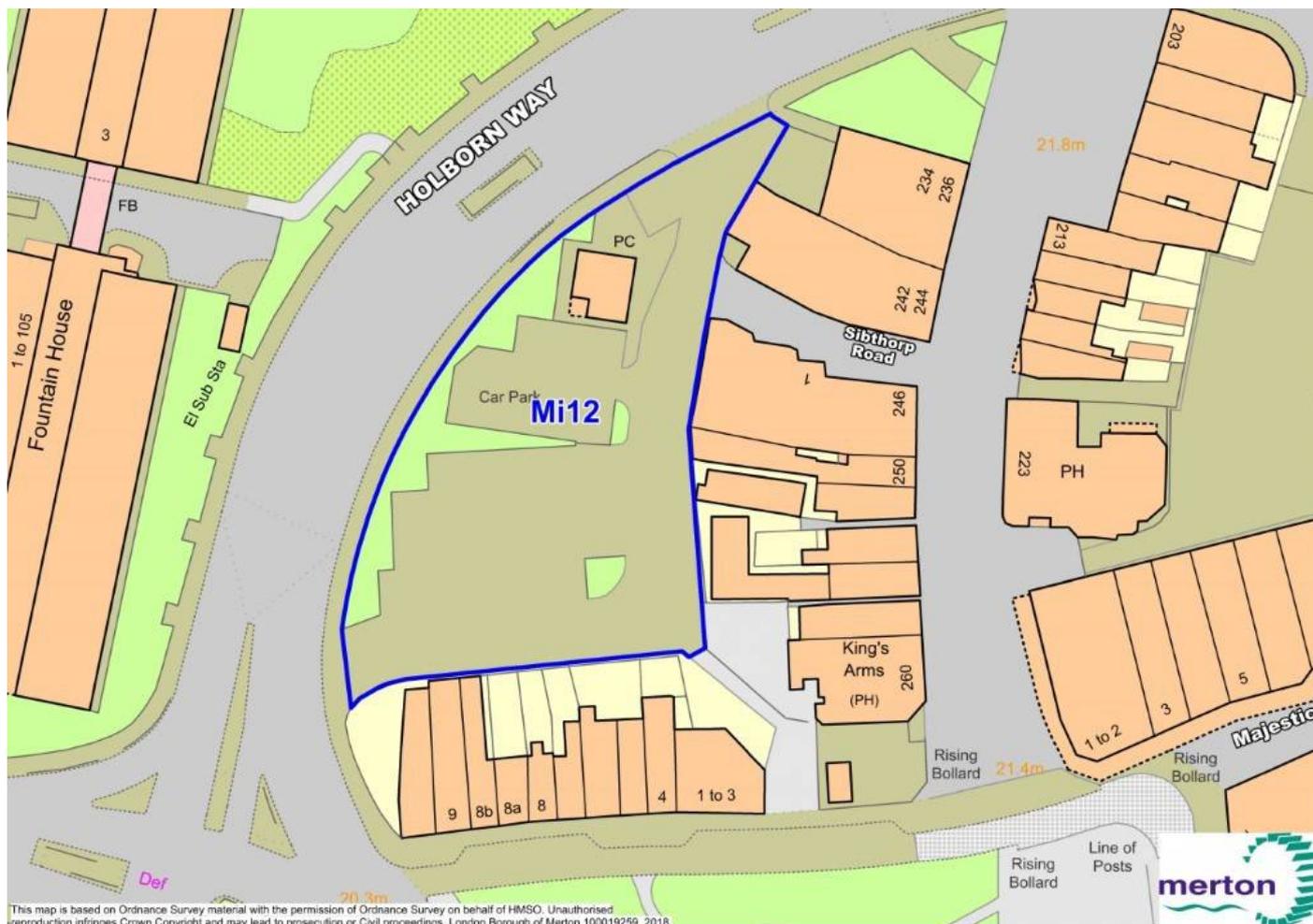
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek advice from Thames Water about the development of this site.

The site location	
Approach to tall buildings	Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
Impacts Listed Buildings or undesignated heritage assets.	No.
Impacts a Conservation Area	No.
Impacts an Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No.
Impacts on flooding from all sources.	Yes.
Is in a town centre.	Yes, found in the town centre boundary and within proximity to the primary shopping area.
Is in an Opportunity Area	No.
Impacts a designated open space.	No.

Impact on ecology designation	No.
Public Transport Accessibility Level (PTAL)	PTAL levels 4 to 5, good to very good access to public transport.

SITE Mi12: Sibthorpe Road Car Park, Mitcham, CR4 3NN



Ward: Figes Marsh

Site description: The site is an irregular quadrant shape, is adjacent a busy main road and is occupied by parking spaces for approximately 50 vehicles, redundant public conveniences, London buses driver facilities and a community recycling area.

Access to the site is via an entry from Holborn Way (a heavy vehicular traffic route) at the northeast boundary with egress along the southwest boundary. There are two points of pedestrian access to the site from London Road via Sibthorpe Road and from the Mitcham Fair Green via a passage adjacent the King's Arms public house.

The site is surrounded by business uses which fronts the London Road bus lane to the east or Upper Green West to the south, however there are also several businesses which have shop fronts orientated toward the car park. To the west of the site on the opposite side of Holborn Road are large four to five storey residential apartment buildings at Sadler Close. The developable part of the site is constrained by the dual frontage businesses addressing the site along the eastern side.

The potential loss or relocation of town centre car parking spaces will need to be considered in line with other site proposals at Raleigh Gardens and Majestic Way.

Site owner: Merton Council.

Site area: 0.26ha

Existing uses: Car Park

Site allocation: Town centre type uses including retail, food and drink, offices, work spaces, leisure, community services and residential on upper floors.

Site deliverability: 5-10 years.

Indicative site capacity (new homes): 20- 40 new homes.

Design and accessibility guidance:

Development proposals provide an opportunity to continue the enhancements started by Rediscover Mitcham and improve the look and feel of this central site.

Development proposals must be well designed to enhance Holborn Way, mitigate traffic noise for its future occupiers as well as mitigating parking, traffic and road safety impacts on neighbouring streets and local amenity. The site is close to the London Road bus lane and any negative impacts on bus operations including during construction should be minimised and mitigation provided.

Development should retain and enhance access for pedestrians and cyclists through the site.

Any negative transport, delivery and servicing impacts on pedestrian and cycle access and bus operations including during construction should be minimised and mitigation provided.

The site provides bus drivers' facilities which must be retained and ideally enhanced as part of any redevelopment of the site.

Site may be required to include a secure cycle storage facility (hub) for wider public access.

Development of the site must create an attractive streetscape along the eastern side of the site (opposite side to Holborn Way).

Respecting and enhancing the character and the views into and from neighbouring Mitcham Fair Green.

Development proposals must adopt sustainable drainage measures as part of the design and layout.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will

also, liaise with and seek advice from Thames Water about the development of this site.

The site provides bus drivers' facilities which Transport for London require to be retained and ideally enhanced as part of any redevelopment of the site. The council recommends discussions with London Buses prior to the submission of a planning application.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	The site is within the wider setting of a grade I listed building (Eagle House).
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Southeast of the site is susceptible to surface water flooding.
Is in a town centre.	Yes
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact on an ecology designation	No.
Public Transport Accessibility Level (PTAL)	PTAL4

SITE Mi13: 30 St Mark’s Road, Mitcham, CR4 2LF



Ward: Figges Marsh

Site description: The site is occupied by a long-term vacant single storey building in poor condition. The site is located on the edge of Mitcham town centre on the main walking route between the town centre and Mitcham Eastfields rail station. To the northwest of the site is St Mark’s primary school. To the north of the site is the Armfield Crescent Estate which has 5-6 storey buildings.

Site owner: Private ownership site allocation suggested by Merton Council.

Site area: 0.04ha

Existing uses: Vacant

Site allocation: Residential.

Site deliverability: 5-10 years.

Indicative site capacity (new homes): 1-2 new homes

Design and accessibility guidance:

Development proposals would provide an excellent opportunity to enhance this run-down site and bring it back into use.

Development should be of an appropriate density and design that responds positively to the character of the area and its setting.

Development proposal must not harm the amenity of the adjacent properties.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The

council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

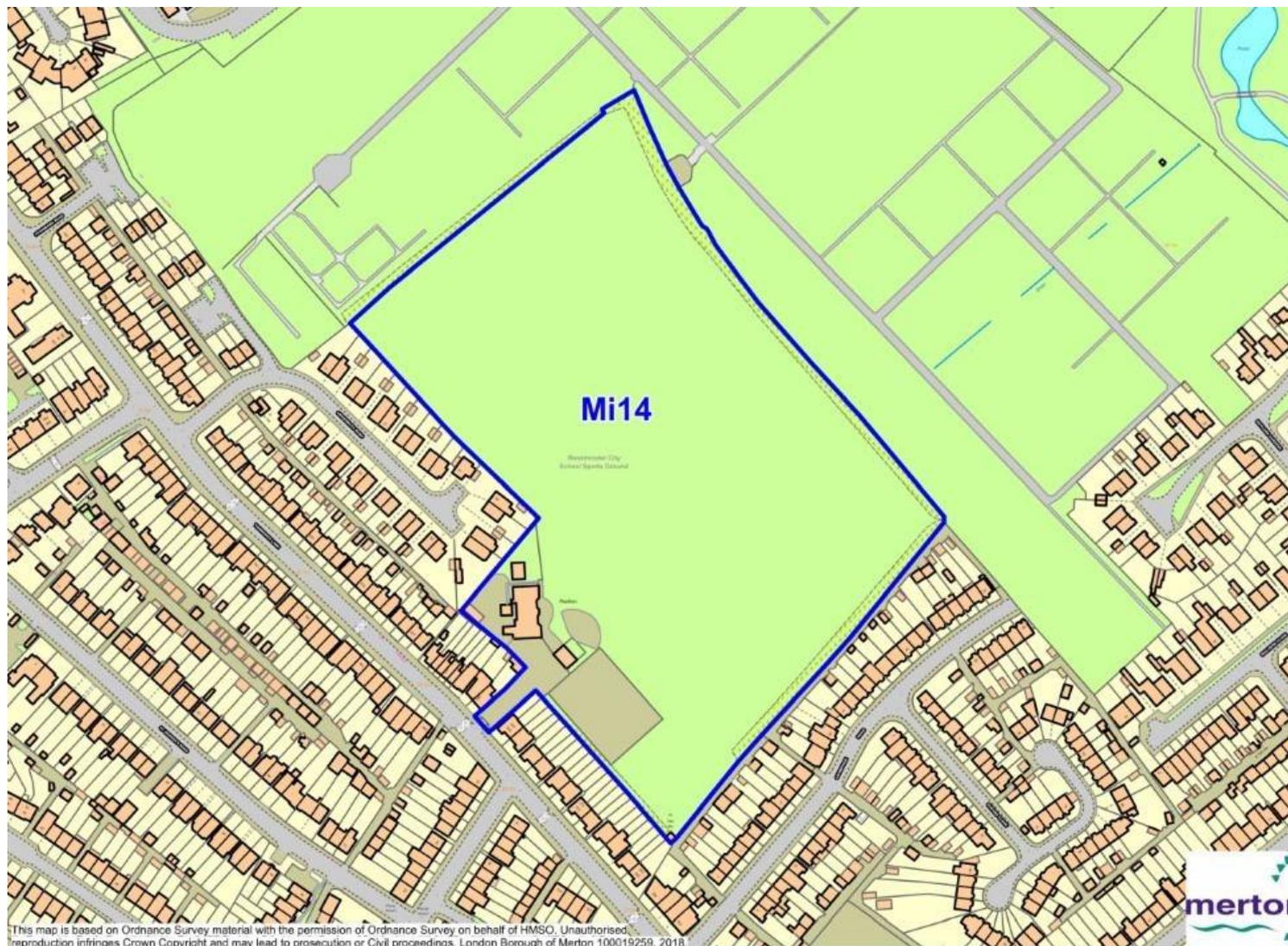
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No.
Impacts an Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No.
Impacts on flooding from all sources.	No.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Wandle Valley Regional Park 400m buffer
Impacts on ecology designation.	No.
Public Transport Accessibility Level (PTAL)	PTAL3, moderate access to public transport (adjacent to town centre PTAL 5- very good).

SITE Mi14: United Westminster Schools site, Tamworth Lane, Mitcham, CR4 1DH



Ward: Longthornton
Site description: This large irregularly shaped site is accessible from Tamworth Lane. It was formerly used as playing fields. To the southwest and southeast lie detached, semi-detached and terraced residential properties fronting Crossways Road and Cambridge Road with rear gardens facing the site. The site boundary to the north and east is with Streatham Park Cemetery (privately owned).
Site owner: Private ownership
Site area: 5.14ha
Existing uses: Vacant former playing field.
Site allocation: Creation of new publicly accessible sporting facilities enabled by residential development.
Site deliverability: 5-10 years.

Additional site information: The consultee has provided evidence of the operation of this site for community uses via rental by local sports clubs for several years, the associated local demand for such uses and the associated financial viability on this site. Since work began on Merton’s Playing Pitch Strategy (PPS) in 2017, this site has been part on ongoing discussions between the landowner, the council, Sport England and a variety of national sporting governing bodies, to consider the options for the site and help determine how sporting facilities could be brought forward on the site (refer to Recommendation G1 of the PPS).

Design and accessibility guidance:

If the entire site cannot viably be used for sports and recreation, the council will consider the creation of publicly accessible and viable sporting or recreation facilities on part of the site enabled by residential development on the rest of the site.

Development of the site is an opportunity to bring back an unviable site into use for sporting activities enabled by much needed new homes.

Opportunity to masterplan the site to provide publicly accessible open space, new homes and associated facilities necessary to support residential development (such as children’s play space).

Development proposals must improve public access between existing public areas and open space through the creation of new and more direct footpaths and cycle paths links.

Development proposals must protect the amenity of neighbouring occupiers.

Development proposals must mitigate parking, transport and road safety impacts on neighbouring streets and local amenity.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton’s Infrastructure Delivery Plan and Green Infrastructure Study 2020.

This site is located in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is located in an area identified as being deficient in access to children’s play space for ages 5-11 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The developer will need to contact Thames Water at the earliest opportunity to discuss the water supply network, wastewater network and wastewater treatment infrastructure capability for this site, including details of the proposed development phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from advice from Thames Water regarding the development of this site.

The site location

Impacts Listed Buildings or undesignated No

heritage assets.	
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	The site is designated as former Westminster City Schools Open Space and is adjacent to Streatham Park Cemetery designated Open Space. Part of the site is within the Wandle Valley Regional Park 400m buffer area.
Impacts an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

SITE Mi15 Taylor Road Day Centre, Wakefield Hall, Taylor Road, Mitcham CR4 3JR

Mi15 - Taylor Road Day Centre



Legend

-  Site boundary
-  Open Space
-  SINC

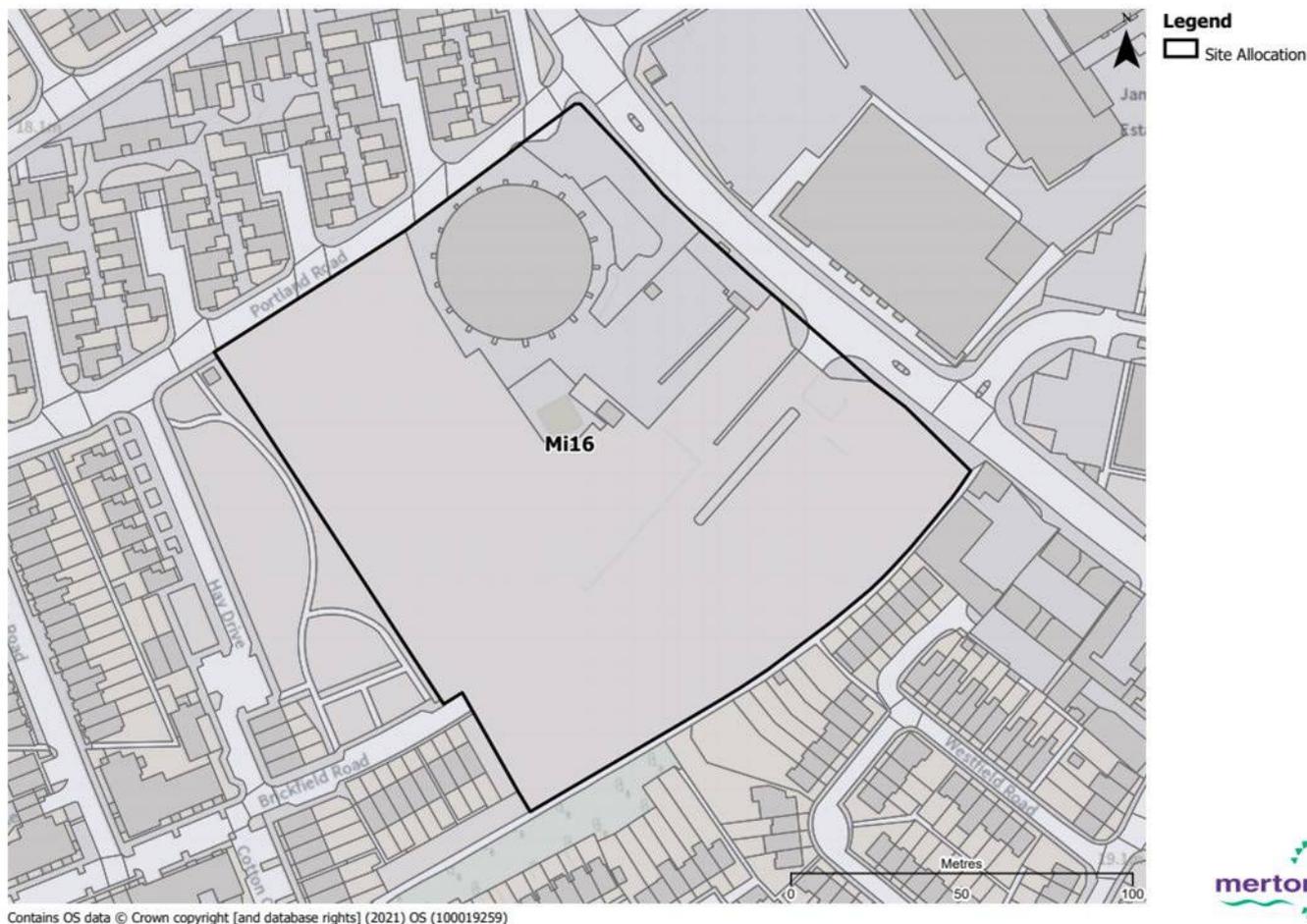
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Ward: Colliers Wood	
Site description: The site consists of a single pitched roof building that is surrounded by two storey houses.	
Site owner: Merton Council	
Site area: 0.08ha	
Existing uses: Day care centre	
Site allocation: Mixed use community (Clinics, health centres, crèches, day nurseries, day centre) and residential or solely residential if the community service is provided elsewhere.	
Site deliverability: 0-5 years.	
Indicative site capacity: 2-6 new homes	
<p>Design and accessibility guidance:</p> <p>Facilitate the provision of a modern community facility on the lower floors and create a more secure environment, helping to minimise vandalism and design out crime. Improve parking, traffic and road safety impacts on neighbouring streets and local amenity or, if a mixed-use development, residential uses should be on upper floors. Development proposals will need to mitigate the potential parking, traffic and road safety impacts on neighbouring streets and amenity. Development of the site must protect the residential amenity of those properties adjacent to and in the vicinity of the site.</p>	
<p>Infrastructure Requirements:</p> <p>Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.</p> <p>This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</p> <p>This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.</p> <p>The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.</p> <p>Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from advice from Thames Water regarding the development of this site.</p>	
The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	No

Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport

SITE Mi16: Mitcham Gasworks Western Road, Mitcham, CR4



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Ward: Lavender Fields
<p>Site description: The site has been cleared except for a large, unused, gas holder in the northern corner of the site. Access to the site is via a driveway entrance from Western Road, a busy road which connects the site to Mitcham town centre. To the northeast, at the other side of Western Road is a large Asda supermarket and surface car park. To the west and east are two storey homes. To the south of the site lies a recent development that was formerly part of the same site and is now a series of three-storey residential apartments and a medical centre.</p>
<p>Site owner: National Grid Property (owners). Allocation suggested by St William Homes LLP (a partnership between Berkley Homes and National Grid Property).</p>
<p>Site area: 2.4 ha.</p>
<p>Existing uses: The site is currently vacant having most recently been used as regional offices for National Grid.</p>
<p>Site allocation: Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre).</p>
<p>Site deliverability: 0-5 years</p>
<p>Indicative site capacity: 200 – 400 new homes.</p>
<p>Design and accessibility guidance:</p>

The site had outline planning permission for a major residential and employment scheme. The residential element has been delivered over 5 years ago (Hay Drive etc). However, the employment part of the permission (which extended onto the site surrounded by the red line, reaching Western Road) lapsed in July 2012. The site's potential uses, and layout is currently constrained by the gasholder on the corner of Western Road and Portland Road. Although the gasholder is no longer used, it has not been officially decommissioned. The landowners are proposing it decommission but until that time development within the vicinity of the gasholder is currently subject to restrictions set out in the Health and Safety Executive's land use planning method (PADHI) which limits the potential for residential-led mixed use development until the gasholder is decommissioned.

The site is subject to a Hazardous Substance Consent (HSC). An application for the continuation of this HSC was granted in 2002 (Ref: 02/P1493). The decommissioning the site and the cancellation of the HSC requirements to enable the redevelopment of the site. The site accommodates two electricity sub stations, an operational gas Pressure Reduction Station (PRS) and above ground gas mains stemming from the historic installation use. A large redundant gasholder and telecoms mast are found to the north of the site on the SGN (Southern Gas Networks) owned land. The site would require decontamination due to its earlier use.

Development of the site provide an excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys.

Development proposals must be laid out to be permeable and legible with full public access through the site, making it easier for people living locally to walk and cycle through the site to access Mitcham town centre or towards Church Road beyond.

The existing "Field Gate Lane" public footpath to the south east of the site must be protected and enhanced to provide a high quality link between Western Road and Miles Road.

Development proposals must deliver much needed new homes, play space, open space and community uses within a landscaped setting on a large brownfield site. The site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan 2021 and Green Infrastructure Study 2020.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

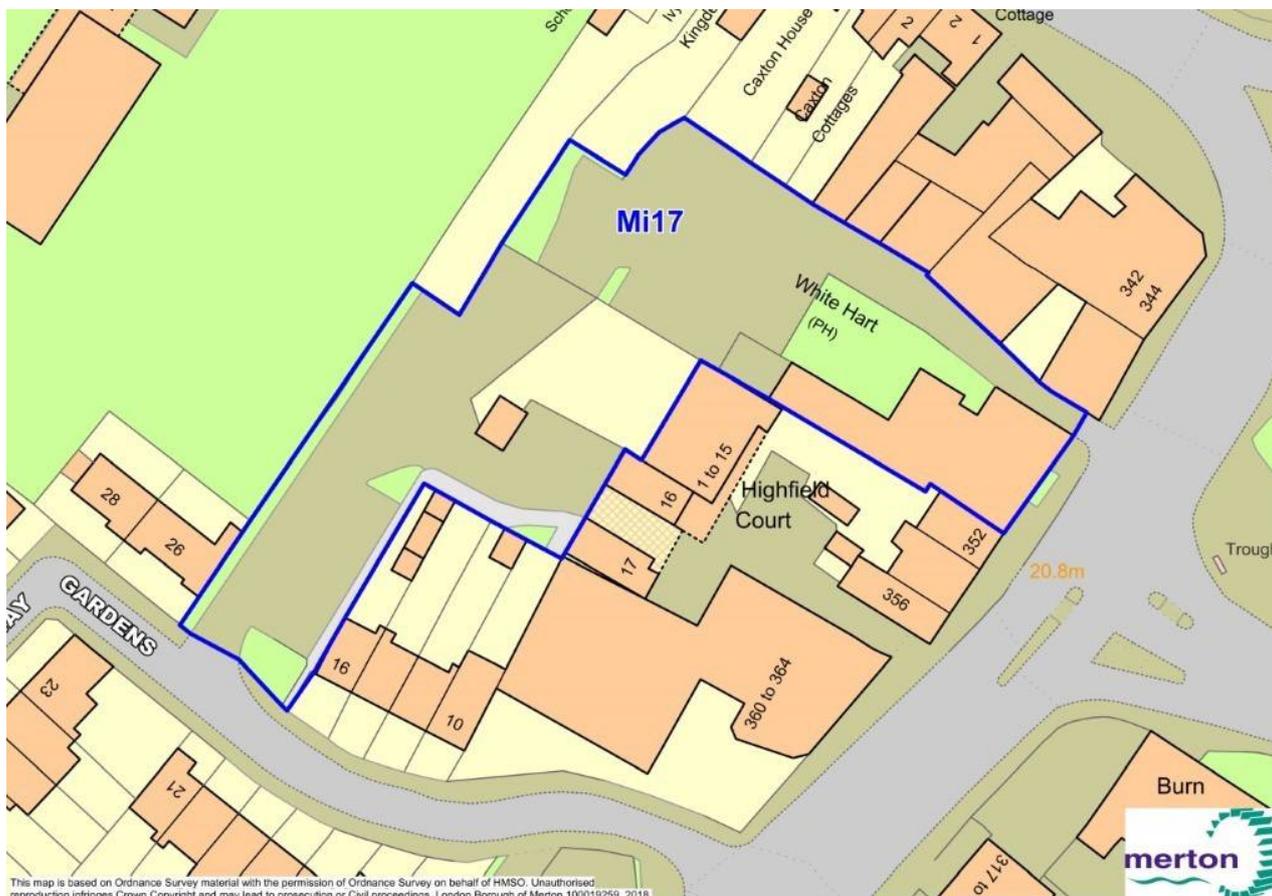
Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, but there are no infrastructure concerns for the wastewater network or wastewater treatment infrastructure capability. It is recommended that the developer liaise

with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development>. The council will require evidence of liaising with Thames Water with any submitted planning application. The council will be liaising with Thames Water and will seek their advice as part of the planning process. Merton Council will also, liaise with and seek advice from Thames Water regarding the development of this site.

This site contains National Grid infrastructure in the form of underground cable 264685. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.

The site location	
Approach to tall buildings	A mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Mitcham archaeological priority zone
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	No
Is in a town centre.	No, however, the site is very close to from Mitcham town centre.
Is in an Opportunity Area	No
Impacts a designated open space.	Wandle Valley Regional Park 400m buffer. Adjacent to open space.
Impact an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 3 good access to public transport.

SITE Mi17: White Hart Pub and back land London Road, Mitcham, CR4 3ND



Ward: Cricket Green
Site description: and to rear of properties on London Road, part of which is a car park for the White Hart pub. Access from London Road and Broadway Gardens. The playground for Cricket Green school bounds the site to the northwest.
Planning permission 18/P2216 was resolved to be granted for 15 homes and retention of ground floor non-residential on this site on 28 th April 2021
Site owner: Private owner
Site area: 0.31ha
Existing uses: Public House (currently closed) and private car park.
Site allocation: Restaurant /cafe or public house or drinking establishment with potential for residential development to enable the restoration and viable function of the White Hart.
Site deliverability: 5-10 years
Indicative site capacity: 10- 15 new homes.

Design and accessibility guidance:

Development proposals must be sensitive to heritage assets in the surrounding area including the White Hart pub and Cricket Green.

Development will need to improve the condition of Grade II* listed White Hart public house and support a viable use of the White Hart pub.

Development proposal must be sensitive to the school playground in design and layout.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from advice from Thames Water regarding the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Grade II listed public house (The White Hart currently closed)
Impacts a Conservation Area	Mitcham Cricket Green Conservation Area,
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Wandle Valley Regional Park 400m buffer zone
Impact on an ecology designation	Yes, Green Corridors
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mi18: Wilson Hospital Cranmer Road, Mitcham, CR4 4LD.



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Ward: Cricket Green.
Site description: The site consists of a large part single and part two-storey hospital building fronting Cranmer Road. Along the south-eastern boundary is Caesars Walk and two-storey terraced houses. To the south and southeast of the site is Cranmer Primary School and its playing fields. The access road to Cranmer Primary School runs along the north-western boundary with a row of two-storey terrace houses beyond. On the opposite side of Cranmer Road is a large open space known as Cranmer Green.
Site owner: National Health Service (NHS)
Site area: 1.81ha
Existing uses: Health centre
Site allocation: Healthcare with community and enabling residential development. or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham.
Site deliverability: 5-10 years
Indicative site capacity (new homes): Dependent on relocation of health care facilities.
Design and accessibility guidance:

Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area.

Development of the site is an opportunity to either provide a health centre/community health centre in a neighbourhood with health inequalities/ poor health or to provide new homes in an area of housing needs (if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham).

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable transport modes and will not result in a reliance on car journeys.

Development proposals must keep the positive feature of the Local Listed building and preserve and enhance the Conservation Area.

An investigation of the potential impact of any proposed development on an archaeological heritage must be carried out.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area.

Development proposals must protect the residential amenity of the adjacent properties.

Infrastructure Requirements:

To ensure that healthcare provision is delivered in this area and that there is no loss of potential NHS sites until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital or Birches Close sites.

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan 2021 and Green Infrastructure Study 2020.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

This site is located in an area identified as being deficient in access to children’s play space for ages 0-4 years. Should residential development be included on site, we will require on-site playspace provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from advice from Thames Water regarding the development of this site.

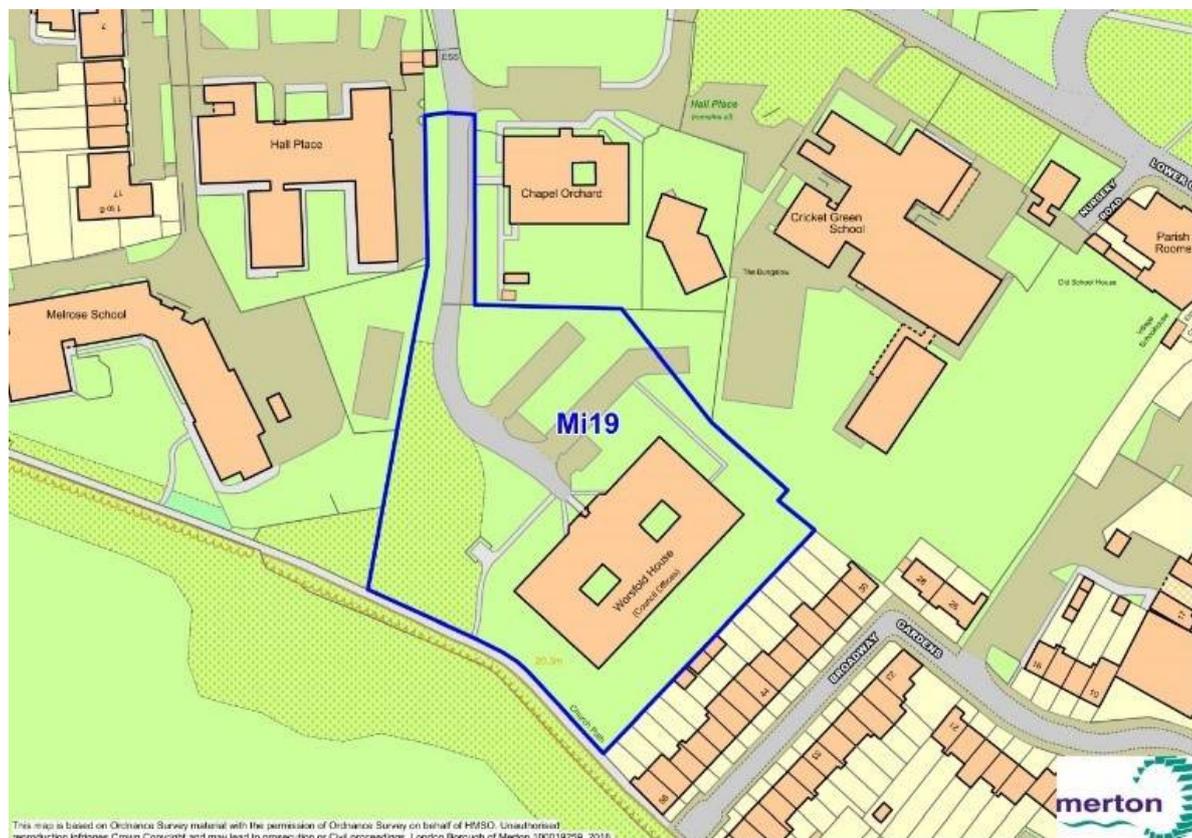
The site location

Impacts Listed Buildings or undesignated heritage assets.

Part of the frontage of the building (facing Cranmer Road) is locally listed.

Impacts a Conservation Area	Yes, Mitcham Cricket Green Conservation Area.
Impacts an Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, some surface water flooding and site is in a critical drainage area.
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Yes, the site is adjacent to Open Space to the south and north. Site is within the Wandle Valley Regional Park. Site is adjacent to Mitcham Common to the north which is Metropolitan Open Land.
Impacts an ecology designation.	Yes, the site is part of a Green Corridor and is adjacent to Cranmer Green Local Nature Reserve.
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

Site name: Mi19 Worsfold House Church Road, Mitcham, CR4 3FA



Ward: Cricket Green

Site description: Worsfold House is a single storey council office building served by an 80 m long access way from Church Road. Fronting Church Road, separating the site from the road, is Chapel Orchard, a single storey former office building and a single storey former surgery building being used as part of Cricket Green school. The site is surrounded by sensitive land uses, including the two special needs schools at Melrose and Cricket Green, the nearby residential properties including Hall Place.

The surrounding area is characterised by large low-rise buildings with generous spaces between them and many large trees and shrubs. At the southwest boundary is a footpath (Church Path) with a large publicly accessible park (London Road playing fields) beyond. To the west is a single storey special needs secondary school (Melrose School) and a two-storey hostel building (Hall Place).

To the east of the site is a part one and two storey special needs school (Cricket Green School) and to the southeast is a row of two storey terrace houses that front onto Broadway Gardens.

Site owner: Merton Council

Site area: 0.81ha

Existing uses: Wandle Valley Resource Centre – office

Site allocation: A suitable mix of school and/or residential.

Site deliverability: 0-5 years.

Ward: Cricket Green

Indicative site capacity (new homes): 45-65 new homes.

Design and accessibility guidance:

The site is an opportunity to provide new homes which are sympathetic and embrace the historic setting of Mitcham Cricket Green.

Development proposals will have to be delicately designed to respect the amenity of the adjacent properties and respect the character of this part of the conservation area.

Development proposal must keep the functional green corridor that will allow for species migration.

Investigate the potential impact of any proposed development on archaeological heritage.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys

Development proposals should provide links across the site to the existing footpath (Church Path) along the southern boundary.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

Development proposals for this site are expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links ensuring that the development enhances access to the park. The council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The site location

Impacts Listed Buildings or undesignated heritage assets.	Near to by not visible from Vestry Hall and St Peter's Church.
Impacts a Conservation Area	Yes, Within Mitcham Cricket Green Conservation Area.
Impacts an Archaeological Priority Area	Yes.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is susceptible to surface water flooding and drainage issues.
Is in a town centre.	No
Is in an Opportunity Area	No

Ward: Cricket Green	
Impacts a designated open space.	Site is within the Wandle Valley Regional Park 400m buffer and adjacent to Open Space.
Impacts on an ecology designation.	Yes, Green Corridor and adjacent to a Site of Importance for Nature Conservation (SINC).
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mo3: Imperial Sports Ground Tooting and Mitcham Hub, Bishopsford Road, Morden, SM4 6BF.



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Ward: Ravensbury

Site description:

The site is a slightly raised field with road frontage onto Bishopsford Road (A217). To the northeast of the site are the artificial grass pitches associated of the Tooting and Mitcham Football Club and other associated pitches and sports buildings. South of the site is Poulter Park and along the southwest boundary of the site, which is also the borough boundary with the London Borough of Sutton, is a vehicle access road to Poulter Park and the dwellings within Bishopsford House, and beyond the road are the rear gardens of dwellings on Hillfield Avenue.

Site owner: Tooting and Mitcham Sports and Leisure Ltd.

Site area: 0.47ha

Existing uses: Field

Site allocation: Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development on this site subject to meeting planning policy, evidence and consultation. Any enabling development would be expected to directly fund long-term capital investment in sporting facilities on Tooting and Mitcham Hub.

Site deliverability: 0-5 years.

Indicative site capacity (new homes): 60-77 new homes.

Design and accessibility guidance:

To be considered as enabling development for the Tooting and Mitcham Hub, any proposals for residential development would be expected to clearly prove how and when they would directly deliver capital investment in Tooting and Mitcham Hub's sporting provision. This could be by considering both in a single planning application with a single legal agreement to secure the enabling investment.

Due to the nature of this site, a high-quality design will be needed to complement the sensitive setting. Development proposals need to be designed to minimise their impact on the openness of the Metropolitan Open Land and to enhance the nature conservation value of the green corridor.

As an Agent of Change, the enabling residential development needs to be designed and built to minimise the impact for new occupiers, and to ensure that the established noise generating sporting venues are still viable and can continue and/or grow without unreasonable restrictions being placed on them.

Potential parking, traffic and road safety impacts on neighbouring streets and local amenity, will need to be mitigated.

Proposals that include residential dwellings, which is defined as More Vulnerable development, would only be allowed in Flood Zone 3 (along the northern edge of the site) where it can be demonstrated that the Exception Test is satisfied:

1. that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk,
2. that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

To satisfy the requirements of the Exception Test and to mitigate the flood risk, development proposals need to incorporate the recommendations in Merton's Strategic Flood Risk Assessment.

On 20 August 2020, Merton's Planning Applications Committee resolved to grant planning permission for the development of 77 homes on the site, subject to the completion of a S106 legal agreement and conditions. This application is considered to be of potential strategic importance and therefore, as part of Stage 2 of the referral process, the Mayor of London now has to make a decision to allow the Planning Applications Committee decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

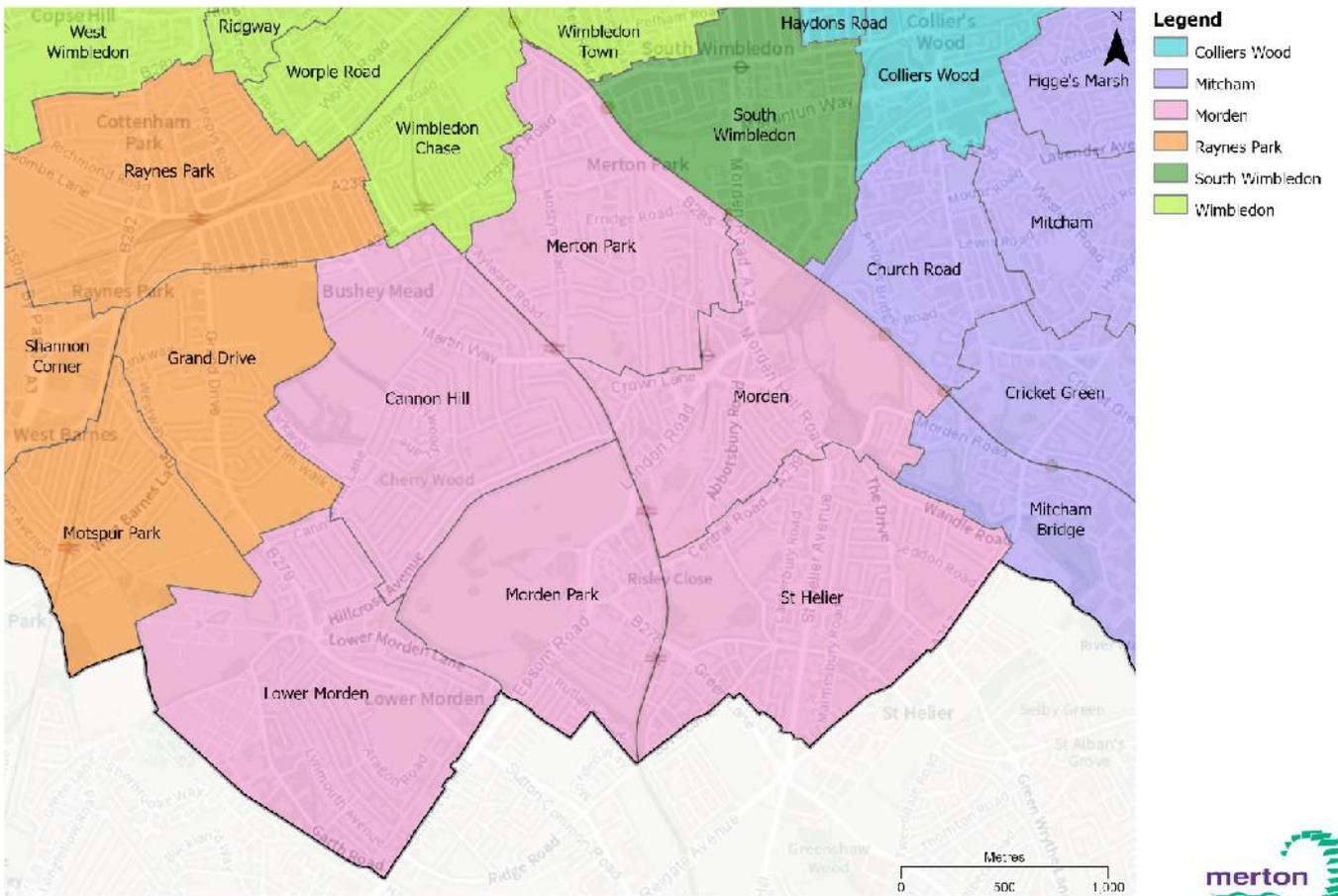
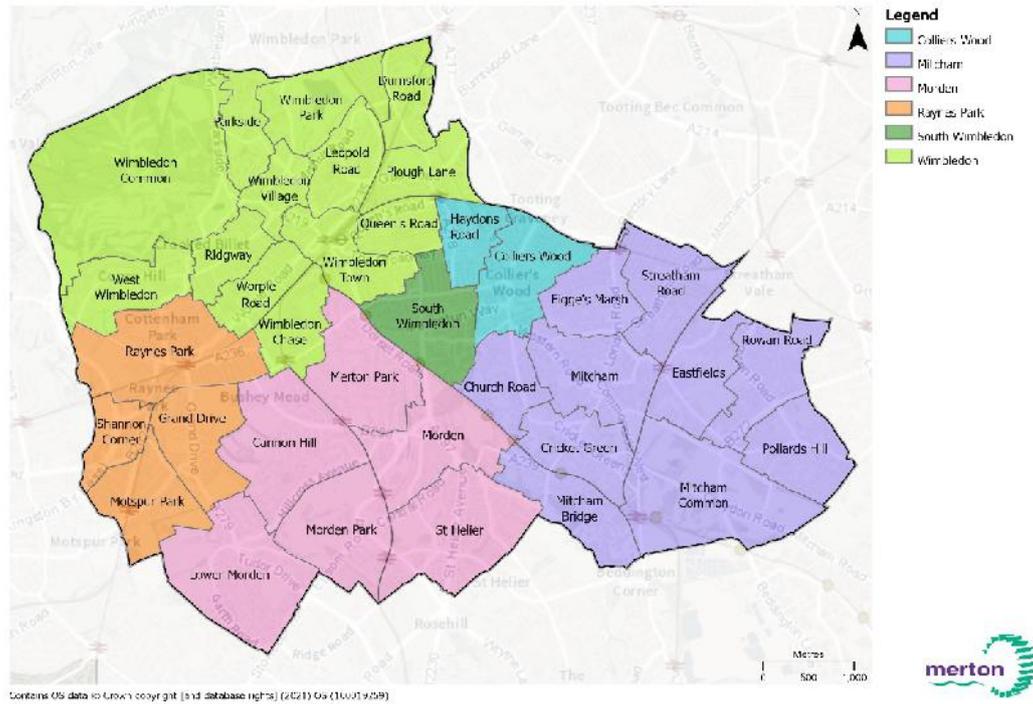
Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure but does not envisage any infrastructure concerns about the water supply network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Yes, northern edge of the site in Flood Zone 3a. The centre of the site is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, the site is designated as protected open space and Metropolitan Open Land (MOL). Poulter Park, to the south of the site, is also designated as MOL in Sutton's Local Plan. The site is within the Wandle Valley Regional Park and the 400m buffer area.
Impacts on ecology designation.	Yes, within a designated Green Corridor and near to a Site of Importance for Nature Conservation (SINC).
Public Transport Accessibility Level (PTAL)	PTAL 1, very poor access to public transport.

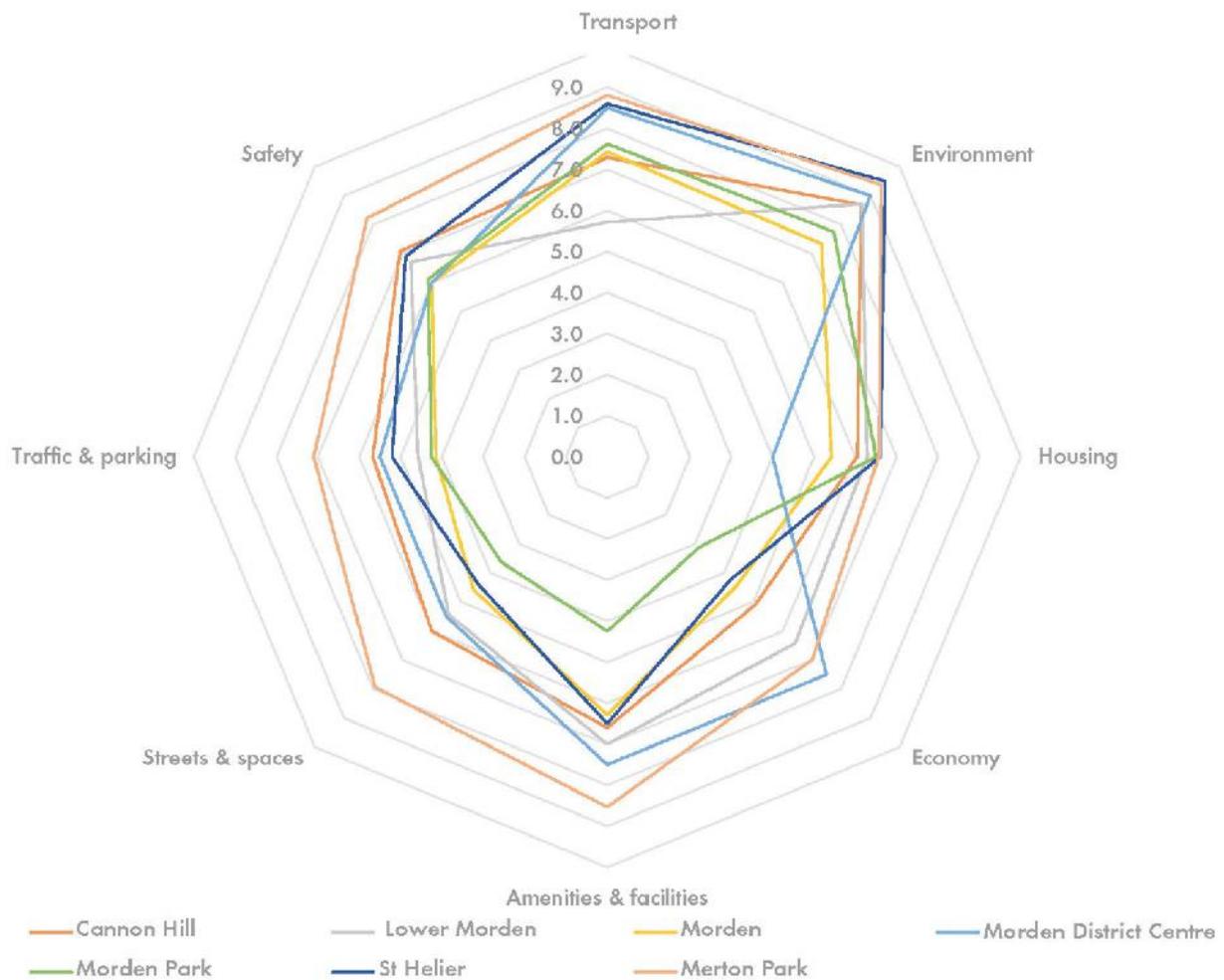


03.3. MORDEN



PLACE PROFILE: MORDEN

As part of the Borough’s ongoing Character Study, 415 Merton residents took part in an online public survey, of which 91 people live in Morden. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform the Borough Character Study 2021.



Results from residents of Morden rating their neighbourhood

KEY OBJECTIVES: MORDEN

The following objectives provide an overarching vision for Morden. More detail can be found in the policy and justification sections that follow.



Providing more high quality homes

Incorporate new homes in the Wider Morden Town Centre Area with a diverse mix of housing sizes and tenures.



Diversifying and supporting retailers

Supporting an appropriate and diverse mix of retail, office, community and leisure uses, including night time uses.



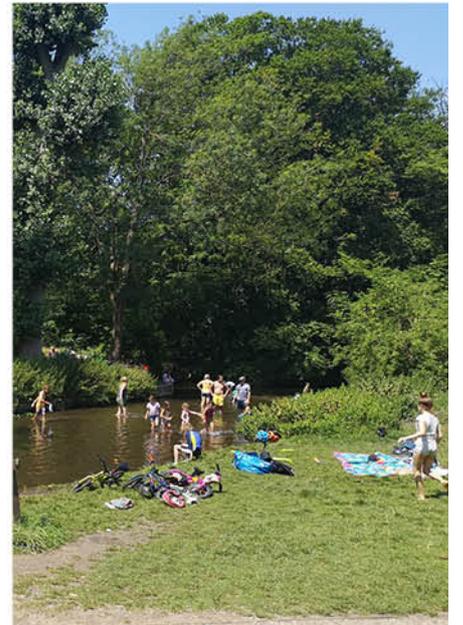
Improving public space

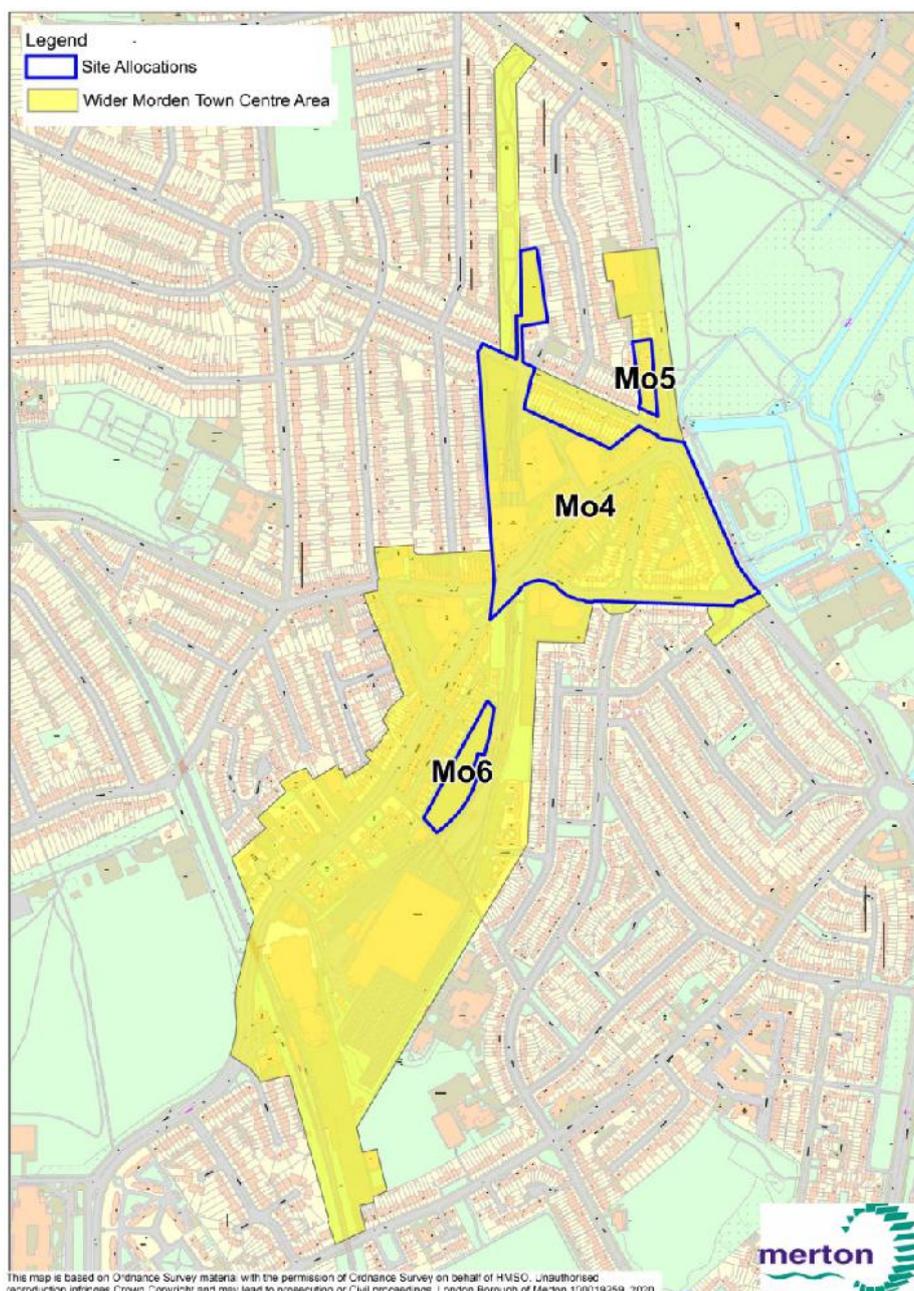
Prioritise pedestrian and cyclists in regeneration of public spaces and streets in the Morden Regeneration Zone and the Wider Morden Town Centre Area.

CHARACTER: MORDEN

These photos illustrate the diverse character found across Morden.





MORDEN: POLICY N3.3

This policy supports the rejuvenation of Morden to create a modern, attractive and vibrant destination that meets the needs of the current and future residents, businesses and visitors, and provides economic, social and environmental benefits. This will be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes intensification and comprehensive development within the Morden Regeneration Zone.

The development capacity of the Wider Morden Town Centre Area will be significantly

increased through a plan-led approach which will:

- incorporate new homes at higher densities than the surrounding residential streets, with a diverse mix of housing sizes and tenures.
- improve and diversify space for shops and businesses.
- provide high quality public realm and attractive and useful public spaces and planting.
- create healthier streets with better connectivity and permeability for pedestrians and cyclists.
- reduce traffic dominance, improve walking, cycling and vehicle links into and around the town centre; and
- provide better services and facilities for the people who live, work or study in, or pass through Morden.

By focusing regeneration in the Wider Morden Town Centre Area, this plan-led approach will help to enhance the character and distinctiveness of the surrounding suburban Morden Neighbourhood. We will achieve this through:

- a. The comprehensive regeneration of the Morden Regeneration Zone (Site Mo4), to optimise the delivery of new homes (including affordable homes), improve the street scene and public realm, make it easier for all to get around, and support businesses and other appropriate uses within the Morden Regeneration Zone. Proposals that assist the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo4, will be supported.
- b. Improving the appearance, user experience and air quality of Morden by relocating the bus stands outside Morden underground station away from their current location to help create healthier streets and a welcoming public space outside the Morden underground station entrance.
- c. Incorporating a range of appropriate public spaces and streets within the Morden Regeneration Zone that enhance accessibility through the Wider Morden Town Centre Area, with pedestrians and cyclists as the priority.
- d. Incorporating green infrastructure that contributes to improved drainage, air quality and the creation of green links through the Morden Regeneration Zone and the Wider Morden Town Centre Area, connecting to the open spaces in the surrounding Morden Neighbourhood.

- e. Supporting tall buildings within the Morden Regeneration Zone and in limited locations within the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. Tall buildings should be located appropriately and relate well to the surrounding context and public realm, particularly at street level. Tall buildings must be informed by comprehensive townscape appraisal and visual assessment.
- f. Supporting an appropriate mix of retail, office, community and leisure uses, including night time uses, within the Morden Regeneration Zone and the Wider Morden Town Centre Area, which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.
- g. Investigating the feasibility of decentralised energy and district heating which takes account of opportunities within the Morden Regeneration Zone, the Wider Morden Town Centre Area and potentially the wider Morden Neighbourhood. Suitable futureproofing measures should be implemented where appropriate.
- h. Supporting incremental site-by-site development outside the Morden Regeneration Zone but within the Wider Morden Town Centre Area, where it:
 - is of a high-quality design,
 - complements and co-ordinates with the surrounding built form and public realm,
 - supports the delivery of new homes and complementary town centre uses, and
 - makes it easier for all to get around and in particular, encourages walking and cycling.
- i. Ensuring that development within the Morden neighbourhood, which surrounds the Wider Morden Town Centre Area, conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure.
- j. Supporting transport improvements within the Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area, such as improvements to the existing tram network and improvements that help enable active travel.

JUSTIFICATION

- 3.3.1. Morden's initial growth was fuelled by investment in London's Underground network, with the arrival of the tube in 1926 which resulted in the rapid development of 'Metroland' type residential suburbs in the surrounding area during the following decade.
- 3.3.2. The attraction of abundant green open spaces, clean air and easy access into central London, made the area a popular destination for families in search of a suburban lifestyle.
- 3.3.3. Almost 100 years later, Morden is changing once again. There is a strong presence of a working age population with a high proportion of families and younger people. People in search of a more suburban lifestyle are heading to Morden due to its leafy suburban nature and excellent connections into central London. Morden's transformation is required to ensure that it continues to meet the needs of the existing and future residents, businesses and users of the area.

Character

- 3.3.4. The character of Morden town centre has eroded over time, but it still clearly has Inter-War characteristics with an Art Deco theme; the underground station building being a significant building from that era and the theme evident in the white rendered shop facades and stone corner buildings of the shopping parades. It is important that new development celebrates, develops and strengthens this physical character, but without necessarily copying it unimaginatively.
- 3.3.5. In terms of activity, Morden town centre is a busy transport interchange and the civic focus of the borough. The town centre also has a broad range of shops, cafes and restaurants. Although this adds to its diversity and distinctiveness, it is undermined by the intrusive road layout, busy traffic and visual dominance of buses. These issues need to be addressed in order to enable the town centre to develop and flourish as a modern centre, and to re-energise as a distinct District Centre.

Background

- 3.3.6. In 2009 the 'moreMorden' vision was endorsed by the Council following the first of

numerous subsequent rounds of public consultation. The aim of this document was to support Morden in becoming a more sustainable town centre, including an emphasis on Morden as an important transport node and supporting a renewed sense of civic pride. This aim has been captured in Local Plan documents thereafter.

3.3.7. Significant progress was made in 2015 when Transport for London, a major landowner within Morden town centre, identified the Morden underground station site as one of its priority development sites and when the Mayor of London announced Morden as one of the GLA's Housing Zones.

Strategic Development Framework

3.3.8. In 2018 Merton Council and Transport for London jointly appointed consultants to carry out all the necessary due diligence studies, including architects Hawkins Brown, to develop a Strategic Development Framework (SDF) for the regeneration of the Morden Regeneration Zone.

3.3.9. The Strategic Development Framework defines:

- Why the regeneration of Morden Town Centre is necessary and important (the 'Vision').
- What the project should seek to deliver (the 'Project Objectives').
- How the project should be delivered in terms of methods and approaches (the 'Delivery Principles'); and
- Where various elements of the regeneration scheme should be located and connected as part of a broader master plan (the 'Spatial Principles').

3.3.10. These elements are not meant to be prescriptive, but they set out a framework for project delivery at a high strategic level in order to provide a clear but flexible way forward and ensure that the regeneration is delivered in line with stakeholder expectations.

3.3.11. The SDF will inform the procurement of a development partner who will help to deliver the regeneration within the Morden Regeneration Zone.

Opportunity Area

3.3.12. The Wider Morden Town Centre Area is within an Opportunity Area as designated in the

London Plan 2021. We will produce an Opportunity Area Planning Framework which will include the significant contribution that the Wider Morden Town Centre Area will make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs.

The need for comprehensive regeneration

- 3.3.13.** Morden town centre was identified as an opportunity for housing intensification in Merton's 2011 Core Planning Strategy (CS3), with the Sustainability Appraisal recognising positive improvements that could be made to retail provision, the public realm and the capacity of Morden's transport interchange.
- 3.3.14.** One of the aims of this Local Plan is to improve the experience for the current and future users of Morden, making it a destination and not simply a thoroughfare. This will be facilitated by improving the quantity, quality and mix of housing offer through intensification of residential development at the heart of Morden, alongside the delivery of a range of associated improvements to the public realm, transport and town centre type uses.
- 3.3.15.** Within the Morden Neighbourhood there is a variety of family sized dwellings, with a limited number of smaller dwellings and flats, particularly within close walking distance to the underground station. The Morden Regeneration Zone provides the opportunity to respond to this need and create a broader range of housing types and tenures. This will also have a significant effect on the types of shops and businesses that will be attracted to the area and is important in enhancing the vibrancy, vitality and economic success of the town centre – helping it to rejuvenate in a sustainable manner that is robust enough to deal with future change.
- 3.3.16.** The housing policies in this Local Plan provides details on Merton's housing targets for the plan period. As illustrated in the SDF, the Morden Regeneration Zone represents an ideal opportunity to provide circa 2,000 units towards meeting this target, the largest single development opportunity in Merton. This is in addition to a number of other small sites identified as Site Allocations within the Morden Neighbourhood.
- 3.3.17.** Within the Wider Morden Town Centre Area, the provision of adaptable housing will be sought, namely homes that can adapt internally to the changing circumstances of their occupants, which requires well thought out, flexible internal layouts as per the Mayor's

Design Guidance. Mixed tenure and a range of dwelling types, along with modern flexible business spaces, will create a mixed community that responds to housing, business and leisure needs and creates a vibrant and diverse community that is robust in times of change and has appropriate protection against decline.

- 3.3.18.** As Merton Council and TfL (Transport for London) both own a significant portion of land within the Morden town centre, they both have a major role to play in enabling and delivering change within the town centre, particularly within the Morden Regeneration Zone. There are also multiple other land ownership interests within the Morden Regeneration Zone and a land assembly strategy will be required to ensure that the site can be developed in a comprehensive manner, to avoid fragmented development and suboptimal densities in this highly accessible location.
- 3.3.19.** A plan-led approach, as set out in the SDF, is required to enable the delivery of a regenerated town centre with circa 2,000 homes and to ensure that the Morden Regeneration Zone provides the economic, environmental and social benefits for the local community. This plan-led approach may take the form of a masterplan, supplementary planning document or an outline planning application.
- 3.3.20.** The part of the Wider Morden Town Centre Area that is outside the Morden Regeneration Zone, is the area for incremental change, where the design and layout of public realm and streetscape is to be actively co-ordinated by the council, so that the Morden Regeneration Zone sits well within the local context.

Healthy Streets Approach: transport, accessibility and public realm

- 3.3.21.** The Mayor's aim for 2041 is for 80 per cent of Londoners' trips to be on foot, by cycle or by using public transport and for all Londoners to be able to undertake at least the 20 minutes of active travel each day required to stay healthy. High quality public spaces can support this and the SDF demonstrates how the Healthy Streets Approach could be delivered within a regenerated Morden town centre.
- 3.3.22.** TfL has identified their land around Morden underground station as one of their major potential development opportunity sites, recognising the benefits that such a development can bring through improvements to the existing transport infrastructure, to help meet the Mayor's Healthy Streets Approach.

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- 3.3.23.** The current location of the bus standing facilities directly outside the underground station creates a poor user experience and has a negative impact on air quality in Morden. One of the key aims of the comprehensive redevelopment of the Morden Regeneration Zone is to relocate the bus standing facilities away from their current location. Suitable alternative bus standing and stopping facilities will need to be agreed and provided as part of the plan-led approach to the regeneration of the town centre.
- 3.3.24.** The dominance of the road and traffic network throughout Morden results in a poor experience for pedestrians and cyclists and negatively impacts on public realm. As such, there is a need for improvements to ensure that pedestrians are given a greater priority, including a legible station forecourt that facilitates improved movement. Creating a safer, more attractive pedestrian environment to encourage the high levels of commuter footfall to linger, is also key to invigorating the local economy. These matters, including the opportunity to review the Transport for London Road Network (TLRN) and potential removal of the gyratory, have been captured in the SDF, which incorporates the Healthy Streets Approach.
- 3.3.25.** TfL's Sutton-Link project, which proposes the extension of the tram network between Merton and Sutton, has been paused as it has not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge then the case for taking the scheme forward will be reviewed. The preferred route runs within 400m from the Morden Regeneration Zone (i.e. at the Central Road roundabout). We will continue to work with Transport for London and others to provide good links between the Wider Morden Town Centre Area, the tram and the underground.
- 3.3.26.** Urban layouts should be based on a permeable and easily navigable network of recognisable streets, routes and spaces that link in seamlessly with surrounding development and facilitate walking, cycling and use of public transport. Streets that are easy to navigate are easy to understand and remember and make places comfortable and attractive. A network of connected streets with clear wayfinding usually enables shorter journeys and more convenient routes that are realistic to walk or cycle.
- 3.3.27.** This has important implications for the design, appearance and use of buildings and where they are located in relation to each other. Morden station is a key landmark building and should remain a visual focal point in the town centre. The current office

building above it could be greatly enhanced to improve its relationship to this locally listed building.

- 3.3.28.** Potential solutions to these urban design matters and indicative details of a potential hierarchy of streetscapes for Morden town centre are set out in the SDF.

Incorporating green Infrastructure

- 3.3.29.** Morden already benefits from a number of large green spaces on its periphery. Connectivity can be improved between the town centre and the surrounding neighbourhoods and local parks, through establishing a network of green spaces that range in scale and form, to incorporate a variety of uses that cater for people of all ages.
- 3.3.30.** The consultation responses indicate that while residents appreciate and frequently use the nearby parks, additional wayfinding features would help to promote these spaces to visitors. The addition of spaces, which include features such as benches and public seating areas, to enable rest and relaxation throughout the town centre, was also identified as a necessity.
- 3.3.31.** Combined with a reduction in vehicular through traffic, these spaces can reawaken the garden city principles which inspired the initial growth of Morden and prioritise people before the road network. Appropriate planting can enhance biodiversity, reduce noise, provide urban microclimate enhancements, improve air quality and provide delightful routes and soft landscaped areas. The orientation of buildings should maximise daylighting on these areas and reduce wind levels to encourage active travel and outdoor activities.

Tall buildings and sensitive edges

- 3.3.32.** The introduction of higher density development within in the Wider Morden Town Centre Area and in particular within the Morden Regeneration Zone, will help to meet the need for additional and mixed housing in the area and will promote a more balanced and cohesive community. The additional population within the town centre will make existing businesses and services more viable and help sustain more facilities in the future, including the potential to develop a night time economy.
- 3.3.33.** Tall buildings that meet the requirements in policy D5.6, are considered appropriate as part of the regeneration and intensified use of the highly accessible land within the

Morden Regeneration Zone and in limited locations, were demonstrated to relate well to the surrounding context, on sites within the Wider Morden Town Centre Area that are in close proximity to the Morden Regeneration Zone. Opportunities exist to use tall buildings to enhance the image of Morden, creating gateways to the centre and landmarks in key locations that add character and legibility.

- 3.3.34.** The scale of existing buildings with the suburban Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties.
- 3.3.35.** The Morden Town Centre Visual Impact Assessment (2020) and the Morden Town Centre Heritage Review (2020) use an indicative 3D model of the SDF to respectively assess potential, height, massing and bulk impacts, and potential impacts on the settings of Heritage Assets, from a selection of viewpoints. Where appropriate, these documents also propose mitigation measures for future detailed development proposals.
- 3.3.36.** In accordance with policies D5.6 'Tall buildings' and D5.5 Managing heritage assets', development proposals will be required to provide comprehensive townscape appraisals and visual assessments to ensure that any tall buildings are located appropriately and relate well to the surrounding context and public realm, particularly at street level, and conserve and where appropriate enhance the local heritage assets. A plan-led approach will ensure that any tall buildings within the Morden Regeneration Zone are sensitively designed and appropriately located, and on sites within the Wider Morden Town Centre Area that are outside but in close proximity to the Morden Regeneration Zone, we will actively co-ordinate the details of proposed tall buildings on a case by case basis with reference to the numerous criteria in policies D5.1 – D5.6.

Creating a vibrant town centre

- 3.3.37.** Town centres are by definition where a range of different activities come together, which bring in a large number of people to work, live, shop and be entertained. This mix of uses is what makes town centres special however, today it is more important that town centres trade on their strengths and unique identities in a more sustainable manner to compete with, and complement, other town centres. In addition to providing a vibrant

range of services, town centres need to supplement and enhance this offer.

- 3.3.38.** Analysis of the town centre undertaken by Hawkins Brown for the SDF, indicates that 65% of all businesses in the district centre are small independents, with more than half of all premises being retail shops. Pop-up street surveys and discussions with members of the local community indicate that future desired uses in the town centre include night-life, restaurants, cafes and cultural events, with a general wish for more diversity and a variety of independent shops.
- 3.3.39.** The Morden Regeneration Zone Site Allocation Mo4 includes a large part of the Morden District Centre, as identified the London Plan. While the existing retail units are heavily utilised, consultation responses have highlighted that the current mix of retail does not meet the needs of the residents. 95% of respondents agreed that there is a need to provide more opportunities in Morden for the community to meet, socialise and make better use of their town centre through provision of attractive, safe and accessible public spaces and community, social, leisure and cultural facilities.
- 3.3.40.** 96% of respondents also agree that the quantity and quality of commercial, residential and leisure uses should be improved in Morden, with a range of uses which are appropriate for a District Centre.
- 3.3.41.** Future development proposals in Morden should therefore respond to the needs of the residents, the daily users of the centre, and those who pass through as commuters. This is essential to ensure that Morden transforms into a place that people will want to visit as a destination. Proposed development in Morden should be of a flexible design to adapt to change over time and buildings should be designed for a long lifespan - being suitable for a number of uses over time. This is particularly relevant for commercial and retail premises in town centres.
- 3.3.42.** The creation of a resilient and exciting high street is key and it should be flexible enough to accommodate change in approaches to retail, leisure and working. With the traditional high street retailers affected by online trading, Morden must look to new uses that will enliven the high street and help to create a vibrant night time economy.
- 3.3.43.** The provision of new employment opportunities in the centre will also contribute to the economic sustainability of Morden as a whole aligning with the Economic Development policy Ec 7.1.

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- 3.3.44.** As detailed in policy Ec 7.5, Morden town centre will change with regards to the range of shops and other town centre and leisure uses but is unlikely to have a significant increase in the quantum of retail space to be provided.
- 3.3.45.** The new Morden Leisure Centre that opened in November 2018, is located less than 1 mile to the south of the site and will provide modern leisure facilities for those who live and work in Morden. Morden Hall Park, to the east of the town centre also provides a variety of leisure, community and cultural facilities. The regeneration of the town centre provides an opportunity for improved linkages between the transport facilities and the park.
- 3.3.46.** Morden Road Clinic has also been identified by the NHS (National Health Service) as a site allocation (Mo5). As this site is located within the Wider Morden Town Centre Area, there may be an opportunity to relocate the health centre elsewhere within Morden town centre to provide a modern, fit for purpose facility that meets the needs of the future population.

Decentralised energy

- 3.3.47.** In accordance with the London Plan, all major developments, such as that proposed within the Morden Regeneration Zone, are expected to follow the energy hierarchy and associated targets to be net zero-carbon. Refer to the Sustainable Design and Construction policies CC8.10 - 15 for further details on reducing energy use, maximising low carbon energy generation and standards on sustainable design and construction.
- 3.3.48.** Decentralised energy is produced close to where it will be used and distributed by a network of underground pipes. We continue to explore how local heat and power can be generated and distributed around the borough using district heat networks.
- 3.3.49.** Further investigative work will be required alongside the redevelopment of Morden town centre, to ensure that the technical details, viability and phasing is further explored and aligned as part of the comprehensive regeneration.

The Morden Neighbourhood

- 3.3.50.** It is important to enhance Morden's suburban character whilst also encouraging development and regeneration in appropriate and highly accessible locations in the borough. While the central heart of Morden has been identified as an appropriate location for intensified development, it is also essential to ensure that the surrounding suburban areas that lie within the Morden Neighbourhood, are respected for their low density, local suburban character and green spaces. Development at the perimeter of the Morden Regeneration Zone and the Wider Morden Town Centre Area are to be respectful of these sensitive edges, to ensure neighbouring occupiers are not unduly adversely affected, and that green and blue infrastructure links and active travel links are enhanced.
- 3.3.51.** Morden underground is the start of the Northern Line underground service provides that provides a direct link into central London and to the rail network locally and beyond via connections at Balham, Battersea and London Waterloo and London Kings Cross. Morden Underground already attracts and has further potential to attract users from a wide catchment area, particularly from the surrounding suburban residential areas to the south, such as Cannon Hill, Lower Morden, St Helier and Sutton that are poorly served by public transport.
- 3.3.52.** It is therefore vital that Morden is well connected to the surrounding neighbourhoods and beyond by a network of safe and convenient pedestrian and cycle routes.
- 3.3.53.** The on-street cycle stands in Morden are already well used and it is important that these facilities are retained and enhanced as part of any public realm improvement. There is also a requirement for a covered, secure and high-quality cycle parking hub that will better support commuters and travellers to park their bicycles for longer periods.
- 3.3.54.** Within the Morden Neighbourhood, areas such as Cannon Hill, St Helier and Lower Morden have parts that have poorer public transport accessibility and car dominance, which contributes to local congestion and air pollution. Where possible, and considering government's permitted development changes, we will work to protect and enhance local shopping facilities and key services and provide a good network of cycle and pedestrian routes in line with the 20-minute neighbourhood approach to ensure that householders have access to shops and services without the need to drive.

- 3.3.55.** Residents value the verdant character of areas such as Merton Park, Cannon Hill, St Helier and Lower Morden that benefit from features such as grass verges, front gardens and street trees, which need to be protected and enhanced.
- 3.3.56.** Improvements will be sought for the transition from residential to the predominantly industrial uses within the Garth Road Industrial Estate, to ensure that the suburban character of the Lower Morden area is conserved and enhanced.

Delivering Morden

- 3.3.57.** There is an opportunity to regenerate Morden town centre, with Merton Council and TfL together owning, controlling and managing a large portion of land, properties and the public realm within the Morden Regeneration Zone and the Wider Morden Town Centre Area.
- 3.3.58.** Extensive due diligence has been jointly undertaken by Merton Council and TfL, including viability assessments, soft market testing, engineering and technical constraints, a Strategic Development Framework with associated capacity testing, a retail impact assessment and rights of light analysis. This work has tested a variety of development options to demonstrate that, with the assistance of grant and investment funding, the Morden Regeneration Zone Site Allocation (Mo4) can be delivered.
- 3.3.59.** An appropriate land assembly strategy to facilitate the delivery of the comprehensive regeneration of Morden Regeneration Zone will need to be developed for this scheme which includes the possible use of compulsory purchase powers if considered necessary and appropriate.
- 3.3.60.** The Morden regeneration scheme has long received cross party support within Merton Council and has been a key development aspiration for a number of years. The partnership between the council and TfL (since 2015) has strengthened the potential for Morden to be developed comprehensively. This is to ensure that widespread change occurs to provide additional benefits that would otherwise not transpire if development came forward on a fragmented basis.
- 3.3.61.** Following on from the initial support by the GLA (Greater London Authority) in 2015, with the identification of Morden as one of London's Housing Zones and the inclusion of Morden town centre in an Opportunity Area in the London Plan 2021, the GLA continues to recognise its significance as a development opportunity that can assist

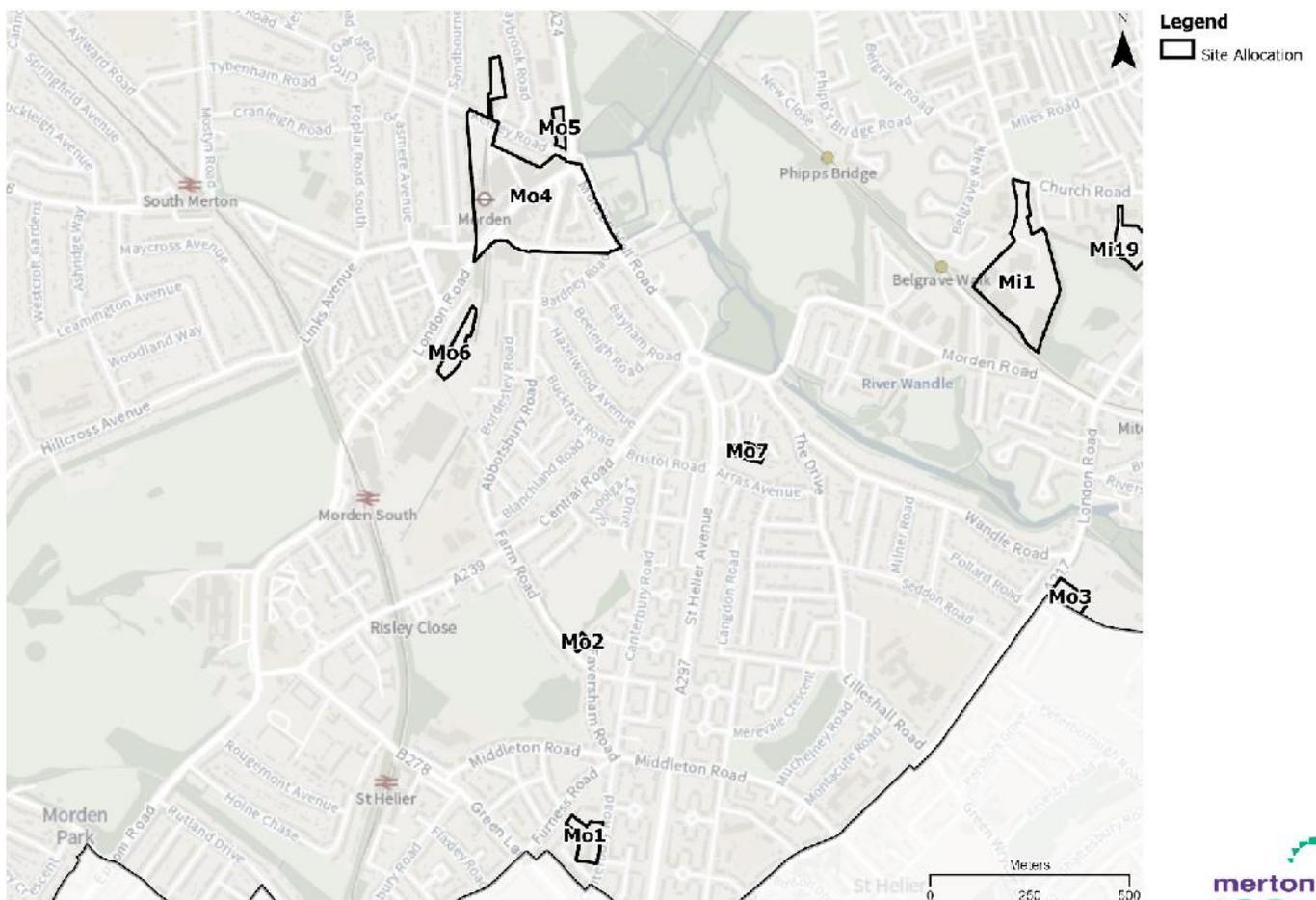
Merton in delivering its housing targets.

- 3.3.62.** Merton Council and TfL have agreed to procure a development partner to deliver the regeneration of Morden Regeneration Zone in accordance with a plan-led approach.
- 3.3.63.** The development is expected to be built out in a staged process to enable the town centre to function during any construction periods, to aid viability and to minimise the impact on the surrounding areas.
- 3.3.64.** The quantum and mix of affordable housing to be provided within each phase of development, will be an integral part of a scheme design and will be prepared in accordance with national, London-wide and local policy and guidance. A mechanism will be required to ensure that viability is kept under review.
- 3.3.65.** Planning obligations (also known as Section 106 agreements) and Community Infrastructure Levy (CIL) will be used to mitigate the impact of development and to ensure the delivery of key infrastructure.

SITE ALLOCATIONS

Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocation will be determined against planning policies (including the London Plan).



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SITE Mo1: Chaucer Centre Canterbury Road, Morden, SM4 6PX



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Ward: St Helier
Site description: The Chaucer Centre is a two-storey building used as a venue for training, meetings and conferences, for council staff and the Merton Music Foundation. North of the site is the Smart Centre, which is an education facility and a former nursery school building. The site is surrounded by two storey terraced houses. Access to the site is obtained from Canterbury Road.
Site owner: Merton Council
Site area: 0.63 ha
Existing uses: Training, meeting and conference centre.
Site allocation: Mixed-use residential and community uses such as clinics, health centres, crèches, day nurseries, day centre or solely residential, subject to the existing training facility being provided on a suitable site elsewhere within the borough.
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 35 -65 new homes.
Design and accessibility guidance: In a mixed-use development, residential uses should be on upper floors. A mix of uses including residential will help the provision of modern community facilities on lower floors and create a more secure environment helping to minimise vandalism and crime.

We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. The site is in an area identified as being deficient in access to public open space.

We will require on site provision in accordance with the infrastructure policies and London Plan- rea identified as being deficient in access to children’s play space for ages 0-4 years.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys. Development proposals will need to maximise the potential to access the site by sustainable travel modes and mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

Development proposals must protect and not unduly harm the residential amenity of those properties next to or in the vicinity of the site.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area on portions of the north and west of the site.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer engage with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with SES Water with any submitted planning application. Merton Council will also, engage with and seek from SES Water about the development of this site.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of liaising with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, susceptible to surface water flooding.

Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE Mo2: Farm Road Church, Farm Road, Morden, SM4 6RA



Ward: St Helier
Site description: The site is located on the corner of Combermere Road and Farm Road, with frontage onto both streets. To the northwest of the site is Merton College Playing Fields and The Cottage associated with it. To the northeast of the site are the terraced houses at Combermere Road. The surrounding area consists of two storey terraced housing built in the 1920s and 1930s.
Site owner: Merton Council
Site area: 0.12ha
Existing uses: Former church (unused for approx. 7-8 years) and associated building: vacant.
Site allocation: Residential.
Site Deliverability: 0-5 years.
Indicative site capacity (new homes): 14- 18 new homes.
Design and accessibility guidance: Development of the site provides an opportunity to supply new homes by bringing back this under used brownfield site and create new active frontages along Farm Road and Combermere Road. Development proposals will need to protect and not unduly harm the amenity of neighbouring residential occupiers and the character of the area. Proposals must mitigate and manage the impacts of parking on the neighbourhood and the local amenity.

On 16 July 2020 Merton's Planning Applications Committee resolved to grant planning permission for the development of 18 homes on the site, subject to the completion of an enabling agreement and conditions.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to nature. We will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

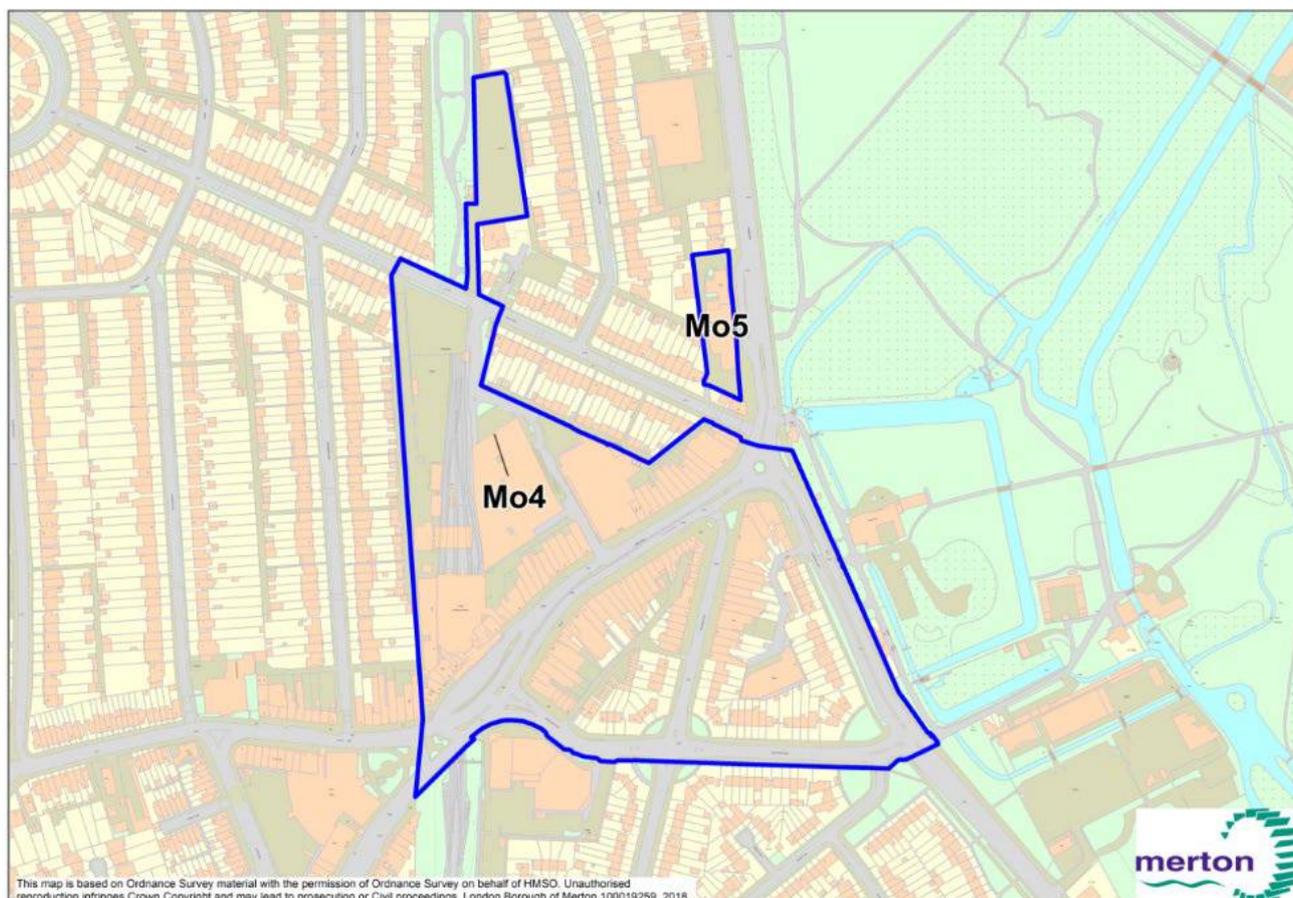
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES (Sutton and East Surrey) Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer liaise with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of liaising with SES Water with any submitted planning application. Merton Council will also, liaise and seek from SES Water about the development of this site.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes. The site adjoins the former Merton College Playing Fields and is near to the Morden Recreation Ground.
Impact on ecology designation	Yes. The southern part of the site is close to Site of Natural Conservation (SINC) and a Green Corridor.
Public Transport Accessibility Level (PTAL)	PTAL 1a to 2, poor access to public transport.

Site Mo4: Morden Regeneration Zone



Ward: Merton Park, Ravensbury and St Helier.

Site description: The site (regeneration zone) includes:

- Kenley Road carpark.
- Morden underground station and bus interchange.
- London Underground Limited (LUL) staff car park and operating facilities to the rear of the underground station.
- Morden station car park.
- Retail, office, commercial and community uses along London Road, Aberconway Road and Abbotsbury Road.
- Residential flats and houses along London Road, Aberconway Road, Abbotsbury Road and Morden Hall Road.
- Public and adopted highway; - Public realm, footways and public access ways; and
- Light industrial uses off Morden Hall Road.

The ground floor of the Morden underground station is a locally listed building.

The proposed site is surrounded by the open spaces of Morden Hall Park to the east and Kendor Gardens to the north, 2 storey residential and commercial uses to the south, north and west and the 15-storey Merton Civic Centre to the south-west.

Site owner: Multiple landowners including Transport for London, Merton Council and private owners.

Site area: 8.4ha

Existing uses: A mixture of town centre type uses, including retail, office, light industrial, transport infrastructure, public realm, residential, community and leisure and sui generis uses.

Site allocation: Mixed retail, office, commercial (including restaurants/cafes), community use (including health centre), transport infrastructure, public realm and residential.

Site deliverability: Commencement within 5 years and delivery in phases within 10-15 years.

Indicative site capacity (new homes): circa 2000 new homes.

Morden Regeneration Zone site vision:

The regeneration vision seeks to take the opportunity to enable large-scale development in Morden town centre, which will secure economic, environmental, and social benefits in accordance with the London Plan. The following are opportunities that could be brought forward on the site through comprehensive regeneration:

1. The delivery of an appropriate mix of retail, office, commercial, community and leisure use, including night-time uses, improved transport infrastructure and public realm, and a significant quantity of new residential development (circa 2,000 units).
2. Comprehensive regeneration of the site, to optimise the delivery of new homes, improve the street scene and public realm, make it easier to get around, and support businesses and other appropriate town centre uses.
3. Transforming the appearance and user experience of Morden by relocating the bus stands away from their current location and creating healthier streets and a welcoming public space outside the Morden underground station entrance.
4. A range of appropriate public spaces and streets that enhance accessibility through the Wider Morden Town Centre Area with pedestrians and cyclists as the priority.
5. Incorporating green infrastructure and where appropriate, contributing to the creation of green links through the Wider Morden Town Centre Area and its surrounding open spaces.
6. The use of tall buildings where appropriate in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.
7. The provision of an appropriate mix of retail, office, community and leisure uses, including night time uses, which provide an appropriate level of active frontage.
8. The delivery of low carbon district heating within the Morden Regeneration Zone and opportunities to link to the wider area.

While the Morden Regeneration Zone is an individual site allocation, there are also other development opportunities in the Wider Morden Town Centre Area including the following site allocations: Morden Road Clinic (Mo5) and York Close Car Park (Mo6). The Morden Regeneration Zone could be considered for redevelopment in conjunction with other sites in Morden.

Design and accessibility guidance: *Please note this is not a definitive list of issues for this site.*

All proposals within the Morden Regeneration Zone are expected to support the above vision and to assist with the delivery of comprehensive regeneration, which realises the full potential of this highly accessible town centre site.

Due to the fragmented nature of the ownership of the land, the proposals will need to include a land assembly strategy to facilitate the optimal development at this site, which may involve the use of CPO (Compulsory Purchase Order) powers if considered necessary and appropriate.

A vibrant and functional new town centre, during and after the construction period, with built-in flexibility to respond to changing town centre use patterns, will have to be an essential feature of any proposal.

In accordance with a plan-led approach, taller buildings would be acceptable in this town centre site, to ensuring the best use of this land that benefits from excellent public transport accessibility. Tall

buildings must however relate well to the surrounding context and public realm, particularly at street level and must be informed by a comprehensive townscape appraisal and visual assessment.

The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter.

Development proposals will have to conserve and where appropriate, enhance the local heritage assets, and promote or reinforce the local distinctive character of the surrounding areas.

Development proposals need to include a healthy, accessible public realm that will also deliver air quality improvements. Proposals therefore need to provide a high-quality public realm outside the underground station. Proposals needs to include:

- suitable alternative bus standing and stopping facilities;
- High quality pedestrian and cycle routes that link to the wider suburban neighbourhoods
- cycle storage including a high quality, conveniently located and publicly accessible cycle hub that provides secure, covered cycle storage for travellers and commuters;
- appropriately managed and sustainable car parking, freight delivery and traffic flow solutions.

The comprehensive regeneration of this site will allow for innovative large-scale energy saving approaches and technologies to deliver a net-zero carbon development.

We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. Part of this site is located in an area identified as being deficient in access to public open space

We will require on-site provision of play space in accordance with the infrastructure policies and London Plan. This site is an area identified as being deficient in access to children's play space for ages 0-4 years.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Developers should engage at an early stage with the owners of the Morden Road Clinic and Morden Hall Medical Centre (Site Mo5), as the Morden Regeneration Zone development is likely to trigger a need for a health infrastructure contribution whilst also presenting an opportunity for the delivery of a modern replacement medical facility within Morden Regeneration Zone boundary.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the water supply, water treatment and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development (s) of this site.

The site is close to the A24 which forms part of the Transport of London Road Network. Transport for London requests no new access or servicing take place from the A24. The London Underground operational assets will need to be safeguarded, with scope for the potential consolidation of uses/facilities to allow for a more efficient use of the site. We will require evidence that the developer has engaged with London Underground submitted with any planning application for the site.

The developer will need to engage with TfL to provide suitable alternative bus stand and bus stop facilities.

The site location

Approach to tall buildings	This site will include tall buildings in appropriate locations subject to consideration of impacts on existing character, heritage and townscape as part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.
Impacts Listed Buildings or undesignated heritage assets.	Yes. The original ground level element of the Morden underground station building is locally listed and along the eastern boundary of the site is Morden Hall Park, which is a registered Historic Park and Garden and holds many locally and statutory listed buildings, walls and other structures.
Impacts a Conservation Area	Yes, parts of Morden Hall Road and Aberconway Road that are within the site boundary, are within the Wandle Valley Conservation Area and Morden Park is the nearest part (~600m) of the Upper Morden Conservation Area.
Impacts an Archaeological Priority Area	Yes, a part of the site is within the Stane Street Tier 2 Archaeological Priority Area.
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, some parts of the site are susceptible for groundwater and surface water flooding.
Is in a town centre.	Yes, a substantial part of the site is within Morden District Town Centre.
Is in an Opportunity Area	Yes.

<p>Impacts a designated open space.</p>	<p>Adjacent to Open Space, Metropolitan Open Land, Site of Importance for Nature Conservation, Green Corridor and is within 400m of the Wandle Valley Regional Park. Yes, north western boundary, the site adjoins the Kendor Gardens Open Space and the Morden Regeneration Zone is in the Wandle Valley Regional Park.</p>
<p>Impact on an ecology designation</p>	<p>Morden Hall Park, to the east of the site, is designated as: Metropolitan Open Land (MOL), Site of Importance for Nature Conservation (SINC), Green Corridor</p>
<p>Public Transport Accessibility Level (PTAL)</p>	<p>Most of the site is PTAL 6a and a small part at the northern end of the site is rated PTAL 5.</p>

SITE Mo5: Morden Road Clinic and Morden Hall Medical Centre Morden Road, Morden, SW19 3DA.



Ward: Merton Park

Site description: The site, occupied by a GP practice and pharmacy consists of a part single and part two-storey building fronting Morden Road (A24) and is surrounded to the north, south and west by single and two storey houses. To the south of the site is also a two-storey building consisting of a commercial unit and a dwelling. To the east, on the opposite side of Morden Road, is Morden Hall Park.

Site owner: NHS Property Services and private ownership

Site area: 0.24ha

Existing uses: Primary NHS healthcare including pharmacy.

Site allocation: Healthcare led mixed-use scheme with residential or solely residential if an NHS primary healthcare facility with similar or greater capacity is provided within Morden town centre.

Site deliverability: 5-10 years.

Indicative site capacity (new homes): 38 -54 new homes.

Design and accessibility guidance:

The development of this site to provide additional healthcare capacity and/or housing would depend on the additional needs assessed and funding provided from the redevelopment of other sites within Morden town centre. Its redevelopment is therefore linked with the regeneration of Morden town centre.

Development proposals must be sensitive to the residential properties next to and in the vicinity of the site and the potential impact on the local Heritage Assets, i.e., the Wandle Valley Conservation Area, Morden Hall Park and the Stane Street Tier II Archaeological Priority Area.

Mitigation measures for potential parking, traffic and road safety impacts on neighbouring streets and local amenity, must be part of any development proposal.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, we strongly recommend that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

The site is close to the A24 which forms part of the Transport for London Road Network (LTRN)- .no new access or servicing should take place from the A24.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	Morden Hall Park, which includes historic buildings to the east of the site, is also registered Historic Park and Garden (Grade II)
Impacts a Conservation Area	Yes, adjacent to the Wandle Valley Conservation Area.
Impacts an Archaeological Priority Area	Yes,
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	Surrounding area is susceptible to surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area	Yes
Impacts a designated open space.	No
Impacts on ecology designation.	Yes, the nearby Morden Hall Park is also designated as Metropolitan Open Land, Green Corridor and a Site of Importance for Nature Conservation.
Public Transport Accessibility Level (PTAL)	PTAL ranging from 5 – 6a very good to excellent access to public transport.

Site Mo6: York Close Car Park Morden, SM4



Ward: Merton Park

Site description:

This site is an open surface level pay and display car park with a single access point via Morden Court. To the west of the site are two-storey residential buildings along Morden Court and York Close and to the east is the Morden underground railway depot.

Site owner: Transport for London (London Borough of Merton Leasehold).

Site area: 0.66ha

Existing uses: Car Park.

Site allocation: Parking and residential or solely residential, if not needed for parking

Site deliverability: 5- 10years.

Indicative site capacity (new homes): 35 – 45 new homes.

Design and accessibility guidance:

The site to contribute to the vision of Morden Town centre regeneration plan.

The potential impacts of displaced commuter parking on neighbouring streets and local amenity needs to be addressed as part of any development proposals.

Development proposals will need to be sensitive to the residential amenity of the existing neighbouring dwellings and the occupiers of any new dwellings, (as in line with the Agent of Change principles set out in the London Plan), not harm the viability and growth of the adjacent train depot and must incorporate suitable mitigation measures to address the critical drainage issues.

We will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. This site is an area identified as being deficient in access to public open space

We will require on site provision in accordance with the infrastructure policies and London Plan. The site is in an area identified as being deficient in access to children’s play space for ages 5-11 years and 0-4 years.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

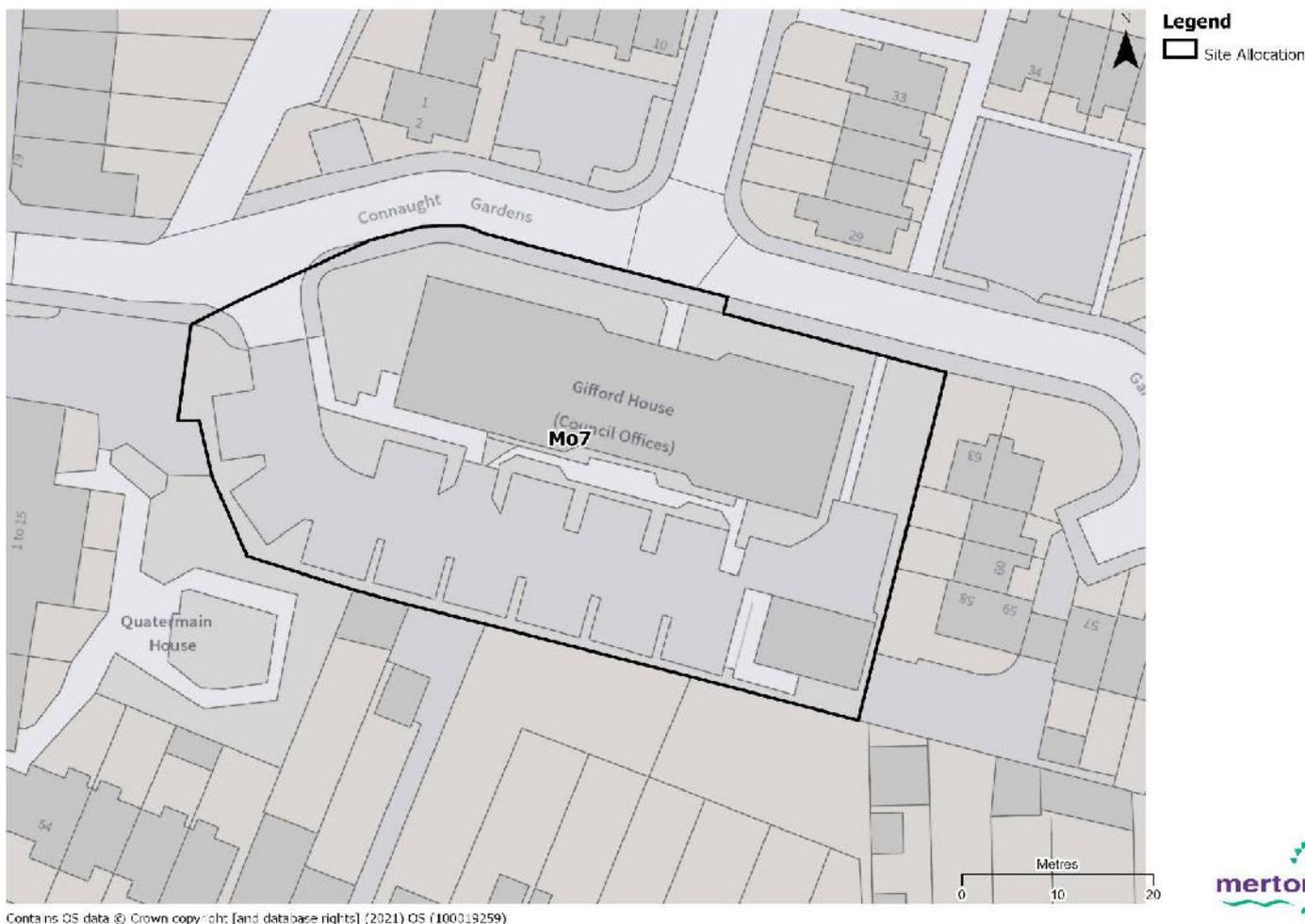
SES Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer engage with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with SES Water with any submitted planning application. Merton Council will also, engage with and seek from SES Water about the development of this site.

Thames Water does not envisage infrastructure concerns about the wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, we strongly recommend that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	A small part of the site, at the north eastern boundary, is within a Critical Drainage Area.
Is in a town centre.	No
Is in an Opportunity Area	Yes
Impacts a designated open space.	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 5 very good access to public transport.

Site Mo7: Gifford House, 67c St Helier Ave, Morden SM4 6HY



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Ward: Ravensbury
Site description: A part-one and part-two storey office building that is set behind (to the east) of the part-three and four storey buildings fronting St Helier Avenue. All the neighbouring properties, to the north, east and south, consist of two storey residential buildings. The site gains access from Connaught Gardens.
Site owner: Merton Council
Site area: 0.27ha
Existing uses: Office
Site allocation: Residential
Site deliverability: 5-10 years.
Indicative site capacity (new homes): 20- 25 new homes.
Design and accessibility guidance: Development proposals must protect and not unduly harm the residential amenity of the neighbouring properties.

Development proposals will need to demonstrate that the scale and type of development is appropriate to the accessibility of the site by sustainable modes and will not result in a reliance on car journeys. Development proposals will need to maximise the potential to access the site by sustainable travel modes and mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity.

The site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. We will require on site playspace provision in accordance with the infrastructure policies and London Plan.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton’s Infrastructure Delivery Plan.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

SES Water has not identified any concerns about the water supply network infrastructure in relation to the development of the site. However, we strongly recommend that the developer engage with SES Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with SES Water with any submitted planning application. Merton Council will also, engage with and seek from SES Water about the development of this site.

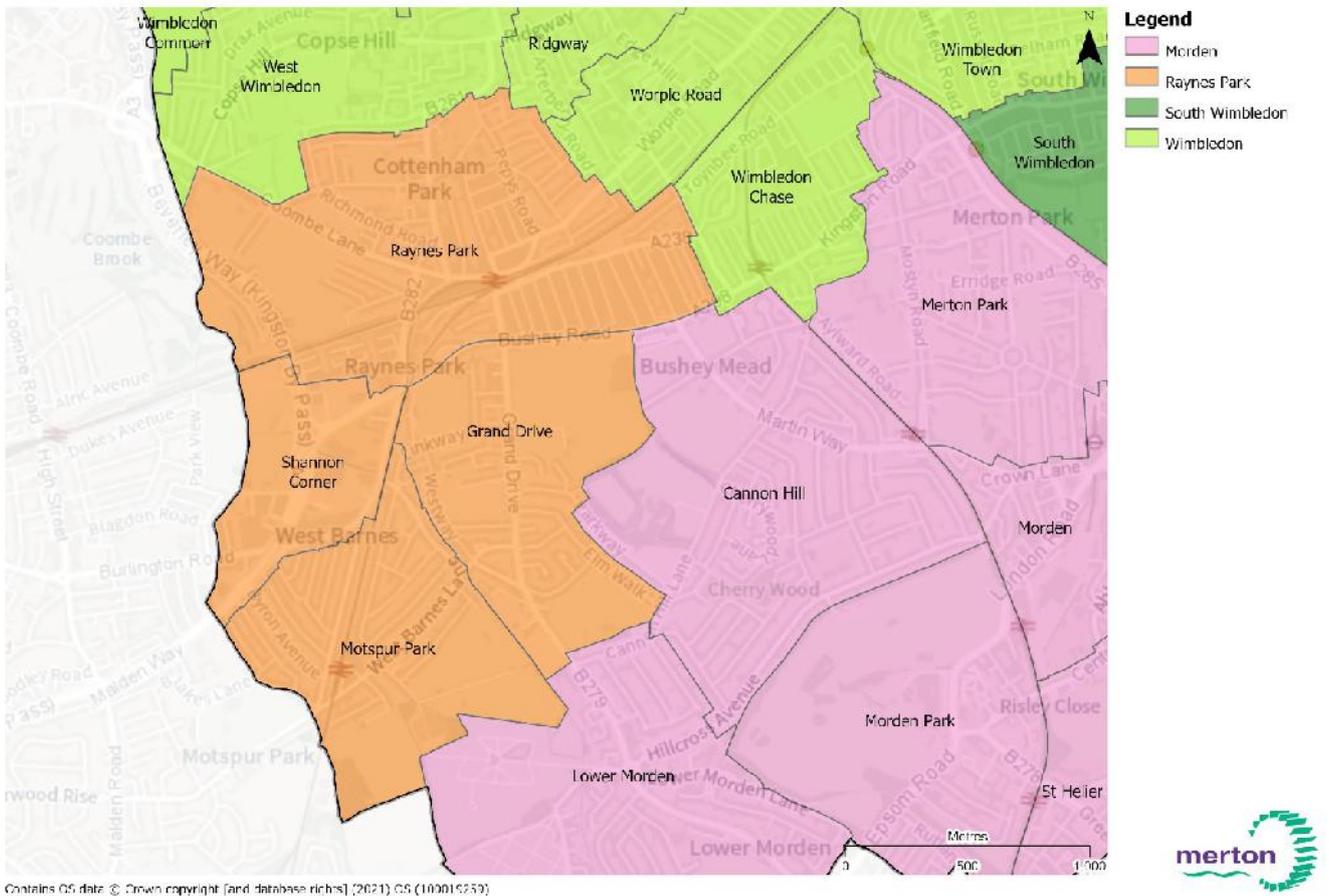
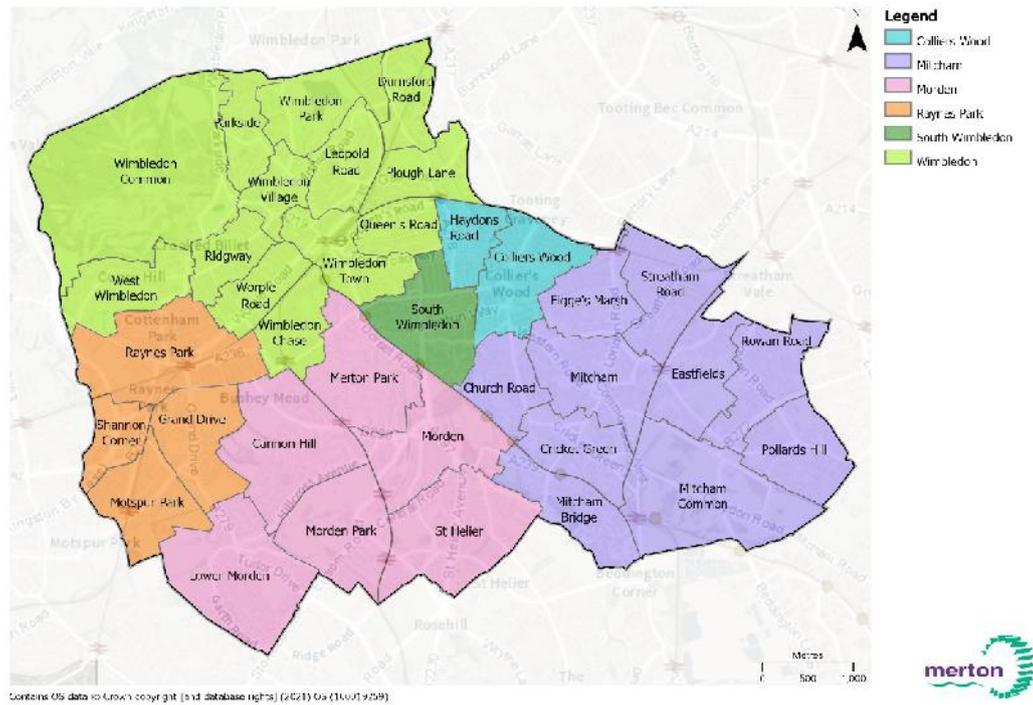
Thames Water does not envisage infrastructure concerns about the wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, we strongly recommend that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from sources.	No
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

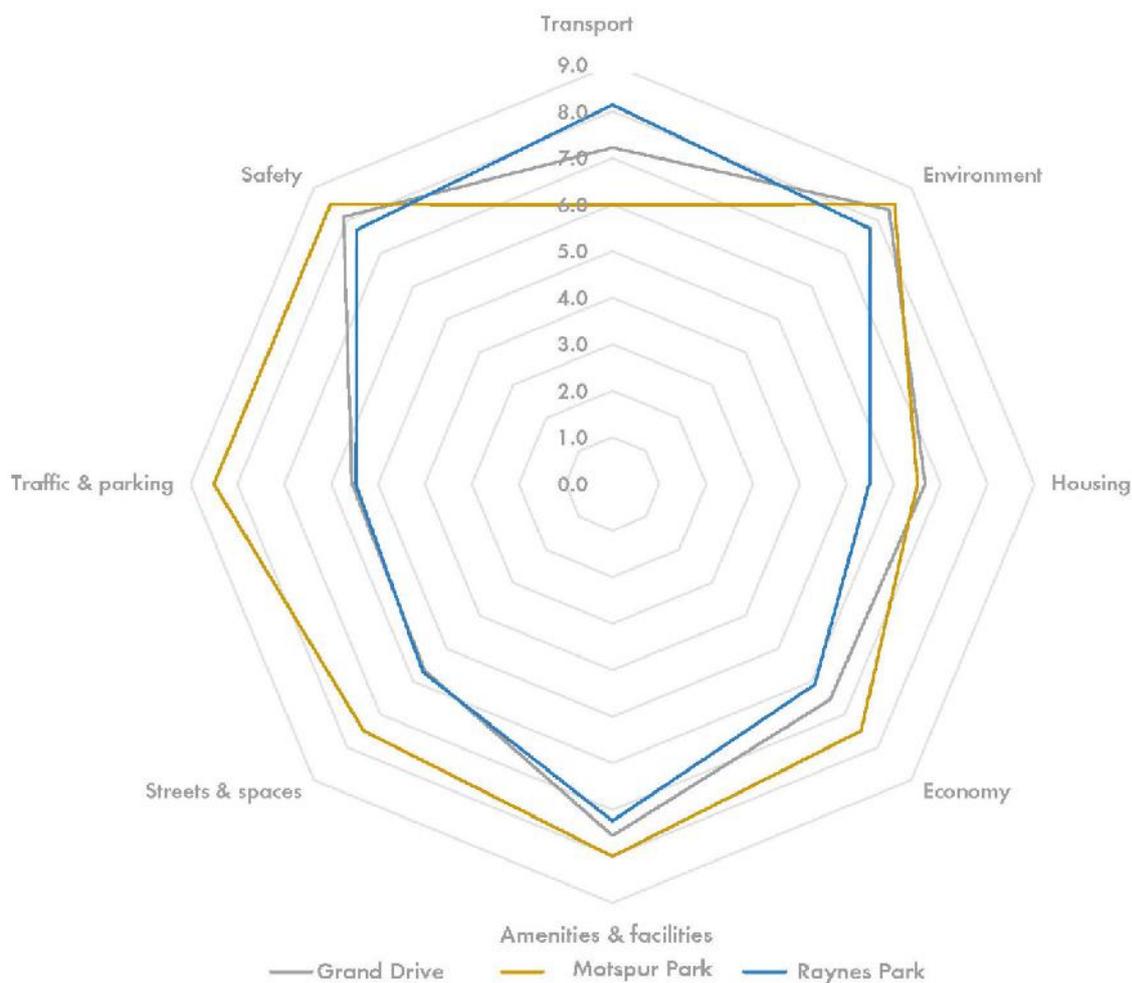


03.4. RAYNES PARK



PLACE PROFILE: RAYNES PARK

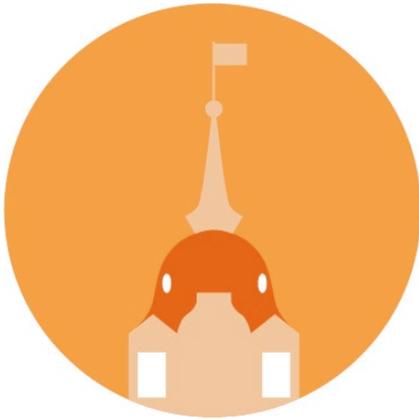
As part of the borough’s ongoing Character Study, 415 Merton residents took part in an online public survey, of which 34 people lived in Raynes Park. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform the Borough Character Study 2021.



Results from residents of Raynes Park rating their neighbourhood

KEY OBJECTIVES: RAYNES PARK

The following objectives provide an overarching vision for Raynes Park.



Celebrating Raynes Park's unique character

Future developments will respect the local character and amenity.



Improving active travel

Securing transport improvements for pedestrians and cyclists and improve public transport facilities and connections.

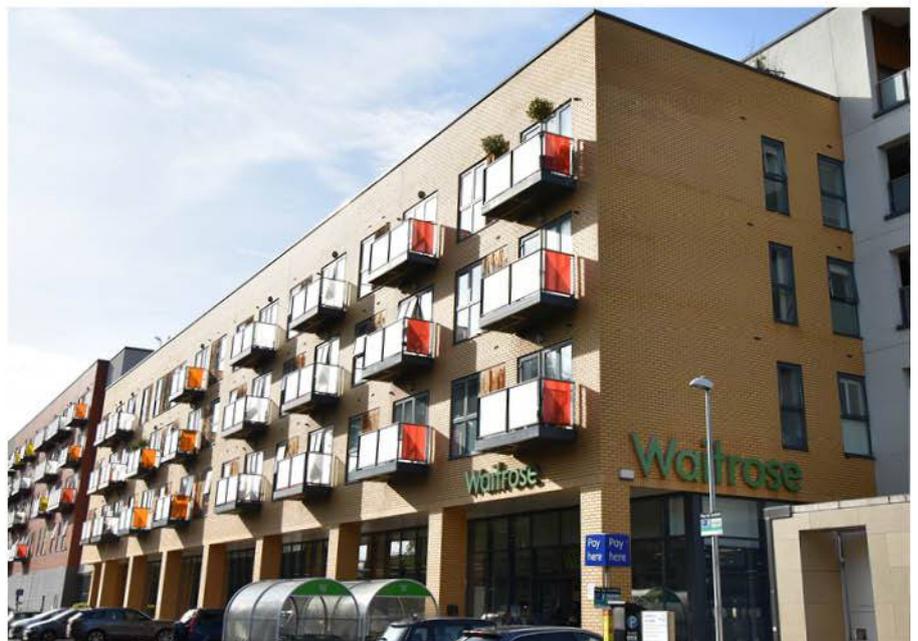


Complement the town Centre.

Create a complementary offer at Shannon Corner where new residents can boost spending power in Raynes Park town centre and new businesses can benefit from the proximity to the strategic road network.

CHARACTER: RAYNES PARK

These photos illustrate the diverse character found across Raynes Park.





RAYNES PARK: POLICY N3.4

This policy supports investment in Raynes Park to maintain its position as an attractive and interesting destination that meets the needs of the current and future residents, businesses and visitors, and provides economic, social and environmental benefits.

Raynes Park Local Centre

To improve the quality of the environment and make it easier for people to move around Raynes Park Local Centre and around the wider neighbourhood.

We will do this by:

- a. Supporting development in Raynes Park Local Centre that provides for the needs of the local community, including a wide range of businesses and services commensurate to the town centre.
- b. Supporting the 20-minute neighbourhood approach by resisting the loss of shops and services within Raynes Park Local Centre.
- c. Ensuring that Raynes Park is maintained as a viable, attractive town centre for businesses to locate and residents to visit; supporting shop front improvements and parking for bikes and scooter deliveries that is designed well into the street scene while meeting the needs of businesses.
- d. Requiring development within and around the centre to address flooding issues particularly from surface water, prioritising sustainable drainage systems that are both effective and attractive.
- e. Securing well-designed and well linked improvements for pedestrians and cyclists and improved access to public transport facilities, including support for step-free access and improved secure cycle parking facilities at Raynes Park station.

- f. In the long term, work with Crossrail 2 and the local community to ensure the benefits arising its investment are realised, that new structures are sensitively designed and compliment the wider residential area and that disruption is kept to a minimum.

Surrounding area of Raynes Park Local Centre

- g. Taking the Healthy Streets Approach by support better pedestrian and cycle links between Raynes Park town centre and the surrounding areas including Shannon Corner and, between the shops and services around Shannon Corner.
- h. Optimise land use by providing new homes above shops and other business premises, for example at Wimbledon Chase and Shannon Corner, where these can be sited and designed to minimise air and noise pollution for new residents.
- i. Businesses will be encouraged to locate at Shannon Corner where they could benefit from proximity to the strategic road network, not compete with nearby town centres or generate significant private car trips.
- j. Supporting the 20 minute neighbourhood approach by supporting shopfront, public realm and street scene improvements and maintaining the day-to-day shopping and other services at Motspur Park and Wimbledon Chase.
- k. Integrating improvements within the public realm: ensuring developments and streets are designed to improve walking and cycling, provide attractive raingardens, pocket parks and other attractive and effective sustainable drainage systems to mitigate the risk of surface water flooding.
- l. Supporting attractive, accessible local parades and neighbourhoods including step-free access at Motspur Park and Wimbledon Chase stations.
- m. Requiring development to respect local character, heritage and amenity in surrounding residential neighbourhoods.

JUSTIFICATION

- 3.4.1.** Raynes Park is an attractive local town centre well served by a mainline train station set within a relatively affluent high quality suburban neighbourhood immediately surrounding the town centre. To the south lies Motspur Park, a smaller local town centre also served by a mainline station and set within the largely residential neighbourhood West Barnes. Kingston Road and Bushey Road lead from the shops and services adjacent Wimbledon Chase station bisecting Raynes Park and West Barnes and onto the A3 road.
- 3.4.2.** Raynes Park Local Centre will be maintained to ensure it continues to be an attractive and viable location for shops and services commensurate with its status as a Local Centre.
- 3.4.3.** To help support local shops, restaurants and cafés during the day we will ensure that some business function is maintained in the Local Centre, such as small and medium offices and other activities, and resist the loss of existing employment uses. A reliance on the commuter trade is not enough to maintain a variety of quality services.
- 3.4.4.** We will complement initiatives started by the Raynes Park Local Centre Enhancement Plan. The enhancement plan guides short to medium term investment in the physical environment that residents and businesses have said are important to Raynes Park. It focuses on:
- improving access and circulation for pedestrians, cyclists, road traffic and public transport users.
 - strengthening Raynes Park's retail offer, making it a more attractive destination for local shopping needs; and,
 - improving the physical environment, appearance and maintenance of the public realm.

- 3.4.5.** The enhancement plan also identifies the development opportunities and planning status of sites within the town centre. Although, the centre has a high PTAL and the redevelopment of redundant sites is welcome, there is a desire to protect the scale and local character of Raynes Park. New development coming forward within and around the centre must reinforce the character of the centre, respect the low scale residential hinterland including Conservation Areas to the north and acknowledge the strategic views across the borough from higher land to the north.
- 3.4.6.** The changing nature of the way we access shops and services has led to a far greater demand for – and greater business reliance on – home deliveries by bike and scooter. Delivery drivers need to park close to high street shops, restaurants, cafes and other services for the apps to recognise that they are available for the business to deliver their produce, which is increasingly important if the restaurant or shop is to remain viable. We will seek to provide well-designed parking for delivery bikes and scooters on the high street to boost business viability while also meeting the needs of pedestrians and other town centre users.
- 3.4.7.** Raynes Park’s share of Merton’s new homes will be provided on some larger sites closer to Shannon Corner and incremental residential development within surrounding neighbourhoods, such as intensification of existing sites through redevelopment and/or conversion of existing single dwellings into multiple units.
- 3.4.8.** The Strategic Flood Risk Assessment identified the potential for flooding over parts of Raynes Park Local Centre and more so to the south around Shannon Corner/Beverley Way. Flooding in Raynes Park local centre itself is attributed to surface water. Flooding at Shannon Corner/Beverley Way is attributed to fluvial flooding of Beverley Brook. Development in these areas should comply with most recent Environment Agency advice and flood risk management policies. In particular development should incorporate sustainable drainage solutions to help manage surface water flood risk. Where sustainable drainage systems are visible to the public, those that are attractive and have other environmental benefits should be prioritised.

- 3.4.9.** The area around Shannon corner has a large out-of-centre retail presence on many sites, including a large supermarket and bulky goods warehouse. The area is very poorly served by public transport, has large amounts of on-site free car parking, excellent links to the road network and a retail offer focused on bulky goods. As a result, it displays extremely unattractive local environment and attracts shoppers almost exclusively by car.
- 3.4.10.** The changing nature of consumer behaviour has reduced the demand for retail sheds and the Council does not support further significant out -of-centre retail development at Shannon Corner. Many of these large sites will be suitable for new homes where these are sensitively designed to improve the setting and public realm, improve links to the town centre and transport hubs and mitigate the impacts of flood risk, poor air quality and traffic noise and provide the necessary infrastructure to support new homes.
- 3.4.11.** Motspur Park Local Centre has a mainline train station, surrounded by residential neighbourhoods which merge into the neighbouring boroughs of Sutton and Kingston-upon-Thames. It provides grocery and other facilities that cater for the day-to-day needs of residents. We will continue to support environmental improvements and the convenience nature of the centre.
- 3.4.12.** As set out in the Good Growth chapter of this Local Plan, Wimbledon Chase and Raynes Park will be supported to be 20-minute neighbourhoods. Wimbledon Chase Neighbourhood Parade is served by a rail station but could benefit from environmental improvements. Transport improvements for the Wimbledon Chase and Motspur Park areas have already been identified, including provision of better facilities for buses, pedestrians and cyclists, with planting to improve the quality of the environment. We will continue to lobby for step free access to Motspur Park and Wimbledon Chase train stations so that all residents can make equal and effective use of their local station.

- 3.4.13.** The suburban neighbourhoods within the neighbourhoods will be conserved and enhanced by ensuring that new development respects local character and amenity, and where appropriate historic value.
- 3.4.14.** Outside this Local Plan period, in the long term investment in Crossrail 2 could transform Raynes Park and Motspur Park local town centres. However, at this stage it is likely that Crossrail 2 will not be completed much prior to 2040, outside the lifetime of this Local Plan. In their consultation response to this Local Plan, Transport for London confirmed that Crossrail2 safeguarding directions will be revised to safeguard the latest proposed route. At the time of writing (June 2021) no safeguarding directions exist for the Crossrail2 route for Raynes Park and Motspur Park.
- 3.4.15.** In the event that planning for Crossrail2 continues, we will work with Transport for London, Network Rail and others to ensure the best outcome from Crossrail 2 for Raynes Park and Motspur Park stations and that the potential disruption and severance at level crossings in the surrounding area is minimised as far as possible. As with Wimbledon, we want to ensure Raynes Park, Mostpur Park and West Barnes remain open for business and disruption is minimised during Crossrail 2's development. While Crossrail 2 remains at the planning stage, we will continue to seek greater investment in all stations and surrounds, particularly step free access which will remove the barrier that currently exists for public transport access to all sections of the community

SITE ALLOCATIONS

Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocations will be determined against planning polices (including the London Plan).



SITE RP1: Amity Grove Clinic Amity Grove, Raynes Park, SW20 0LQ.



Ward: Raynes Park
Site description: The site consists of a part single and part two storey building, which is surrounded by two and three storey houses. Along the northern boundary is a narrow public access footpath linking Amity Grove and Durham Road.
Site owner: National Health Service (NHS).
Site area: 0.09ha
Existing uses: Former medical clinic.
Site allocation: Residential (former health services have now re-located to Nelson Medical Centre).
Site deliverability: 5-10 years.
Indicative site capacity: 5-10 new homes.
Design and accessibility guidance: Development proposals should protect and improve the public footpath which borders the site to the North. Mitigate potential parking, traffic and road safety impacts on neighbouring streets and local amenity. Protect the residential amenity of those properties next to, or in the vicinity of the site. Development proposals must have regard to the recommendations in Merton’s Strategic Flood Risk Assessment.

Infrastructure requirements:

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise with and seek from Thames Water about the development of this site.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Site is in a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 5, very good access

SITE RP2: 245 -247 Burlington Road, New Malden, KT3 4NE.



Ward: West Barnes

Site description:

The site has several vacant industrial buildings fronting Burlington Road to the south. A range of shops and services are found at the other side of Burlington Road. To the north is the surface car park associated with the substantial Tesco supermarket (part of which is proposed for allocation in this Local Plan as site RP.3).

There is a path running east/west along the north boundary of the site providing pedestrian/cycle access from Burlington Road to Beverley Way. To the west of the site lies Sacred Heart Catholic Primary School and a two-storey building for Enterprise car rental.

To the east of the site are several commercial buildings ranging from one to two storeys, currently occupied by a car wash and bathroom showroom. Burlington Road is a Locally Significant Industrial location and is next to a primary school.

Site owner: Tesco Stores LTD.

Site area: 1.3 ha.

Existing uses: Former light industrial use; now largely rundown.

Site allocation: Commercial, business, service and community use appropriate to a residential area.

Site deliverability: 5-10 years.

Indicative site capacity: 65- 90 new homes

Design and accessibility guidance:

Development proposals must take the opportunity to improve this part of the Locally Significant Industrial Site and provided a more vibrant, attractive setting for the nearby school, shops and services.

Development proposals must optimise the delivery of new homes in this highly accessible location.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips, through appropriately managed car parking, deliveries and servicing.

Development proposals should protect and improve access for pedestrians and cyclists along the public footpath which runs along the north boundary of the site.

Development proposals must improve the public realm including pedestrian safety and be compatible with the amenity of neighbouring occupiers of buildings.

Development proposals will need to protect the amenity and safety of the users of the primary school on the western boundary of the site.

An investigation on the potential impact of development on Archaeological Priority Area is needed.

The Exception Test is not needed, However, its proximity to areas of Flood Zone 3a and the risk of flooding from the Pyl Brook in the future because of climate change; development proposals must incorporate all recommendations in Merton’s Strategic Flood Risk Assessment (SFRA).

Infrastructure Requirements:

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also, liaise and seek from Thames Water about the development of this site.

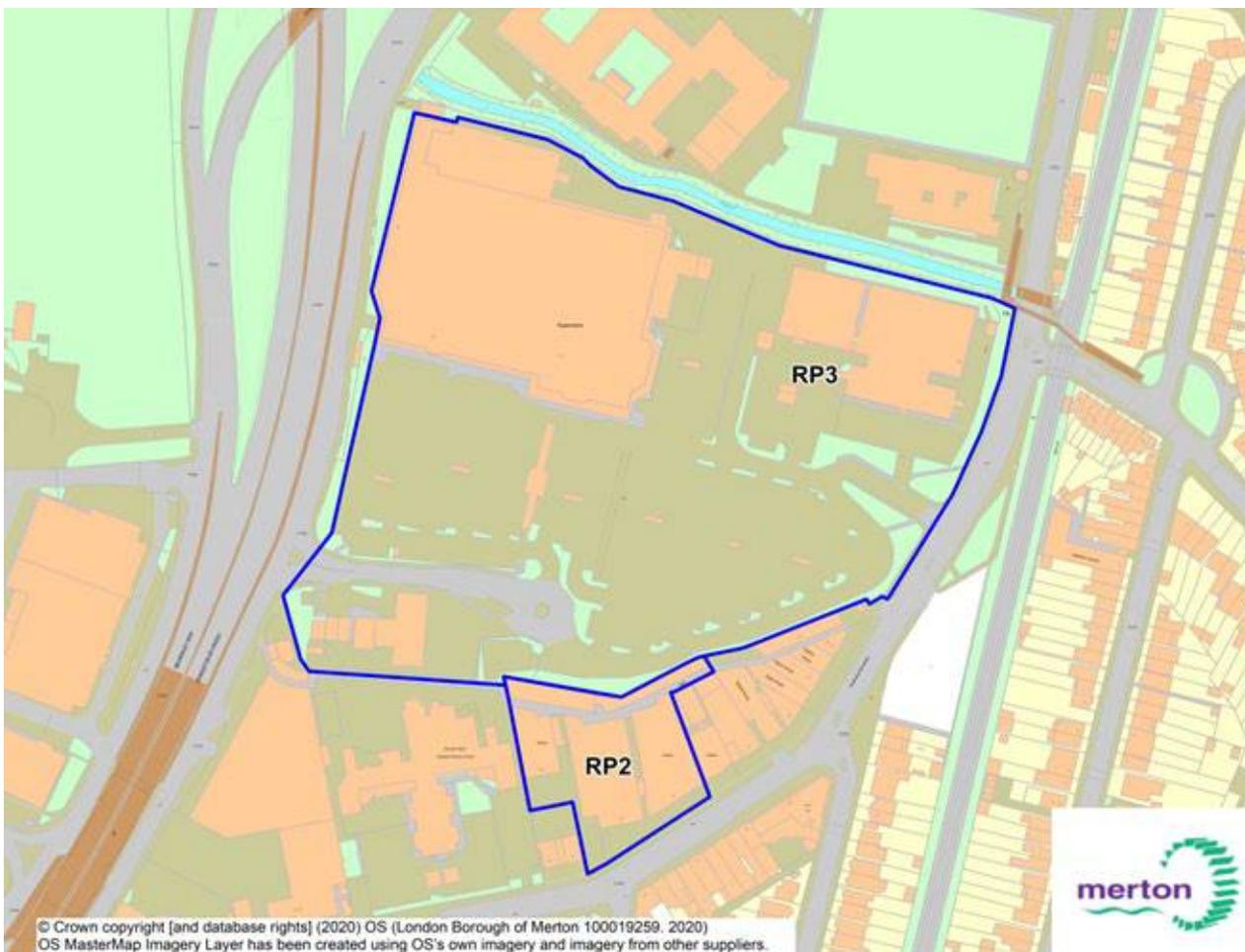
The site location

Impacts Listed Buildings or undesignated heritage assets.

No

Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	The northern part of the site is within the Archaeological Priority Area for West Barnes Farm.
Impact on flooding from all sources	Flood Zone 2 – close proximity to 3a.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on an ecology designation.	Southern end of the site is near green corridors.
Public Transport Accessibility Level (PTAL)	PTAL 3, moderate access to public transport.

SITE RP3: Tesco, Burlington Road, New Malden, KT3 4N



Ward: West Barnes

Site description: The site includes a Tesco Extra, car parks and an office building. The site is accessed from West Barnes Lane to the east and Beverley Way to the West. The Pyl Brook is the boundary for the north of the site and beyond that lies Raynes Park High School. The railway line from Raynes Park to Motspur Park and a level crossing lies adjacent to West Barnes Lane. The area to the east is characterised by inter-war suburban residential development. There is good access by road from the A3 to the west of the site and a shopping parade and light industrial uses continue along Burlington Road to the south.

Part of the site was subject of a Planning Appeal in 2020 -21 (19/P2387) and at the time of writing (June 2021) the Planning Inspectorate have not issued a decision.

Site owner: Tesco Stores Ltd.

Site area: 5.26ha.

Existing uses: Tesco superstore, vacant office warehouse site.

Site allocation: Comprehensive redevelopment of the site to keep the supermarket with the same floorspace as exists in a new, purpose-built unit and to optimise the rest of the site for delivering new

homes, landscaping and access.

Site deliverability: 5-10 years.

Indicative site capacity: 300- 460 new homes

Design and accessibility guidance:

Development of the site provides an opportunity to deliver a considerable number of new homes including affordable homes and a mix of types, sizes and tenures.

Development proposals must substantially improve street environment and enable cycling and walking through the provision of improved access routes through the site including directly to Burlington Road and to enable a connection with the public footpath to the south.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips, including for deliveries and servicing.

Development proposal must not have an impact on the vehicular access / egress (24 hour) to the Tesco store (car park and service yard).

Development of the site present an opportunity to improve the currently overgrown and inaccessible on the northern boundary of the site (Pyl Brook).

The residential development at the Site must complement both the existing retail use and this existing residential in the immediate and surrounding area.

Development proposal must incorporate the recommendations of Merton's Strategic Flood Risk Assessment.

Infrastructure Requirements:

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is close to the A3 which forms part of the Transport for London Road Network (TLRN). TfL recommends no new access or servicing take place from the A3.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to

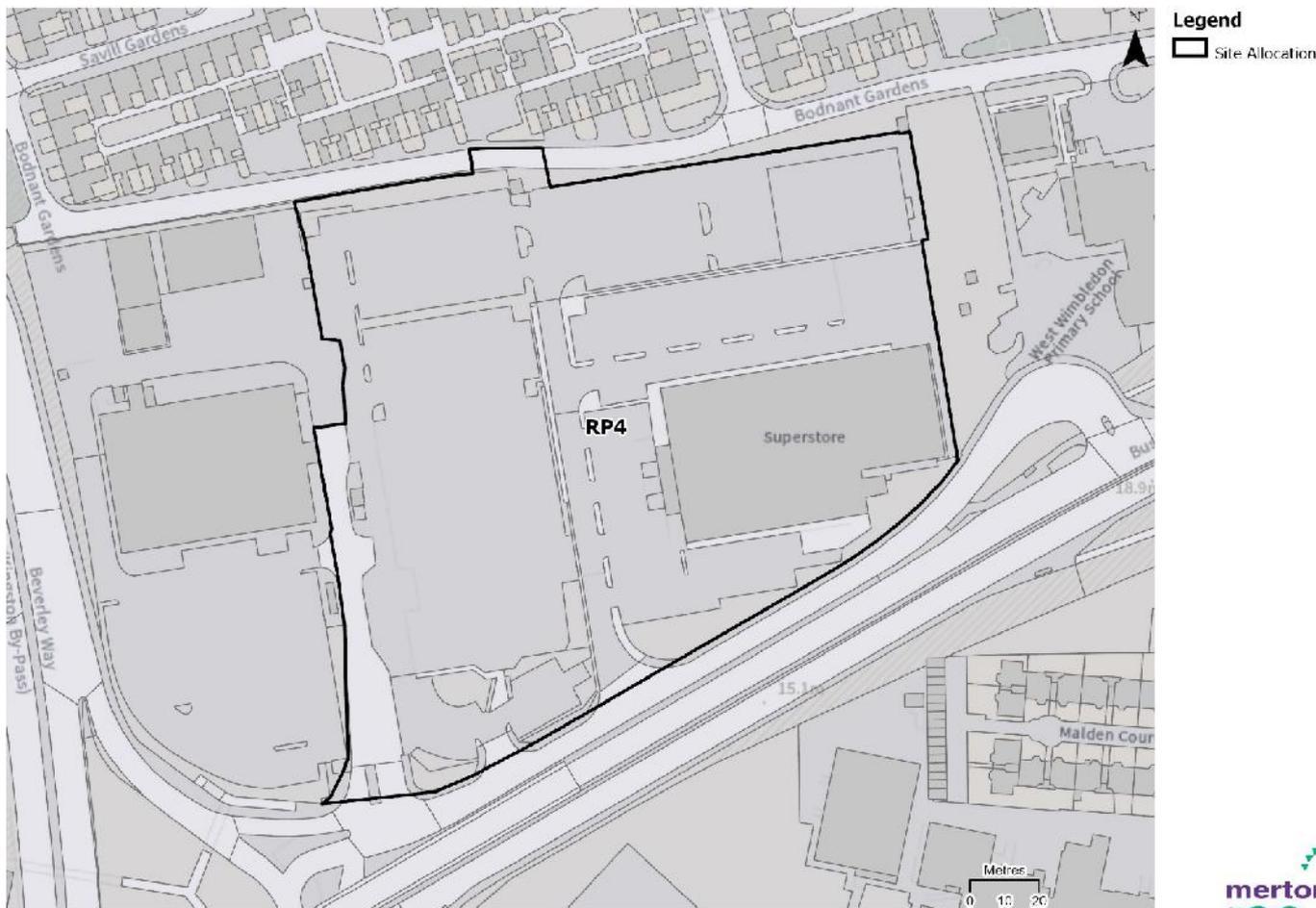
control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

The site is close to the A3 which forms part of the Transport for London Road Network (LTRN) - no new access or servicing should take place from the A3 advice from TfL.

The site location

Approach to tall buildings	The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings.
Impacts Listed Buildings or undesignated heritage assets.	No.
Impacts a Conservation Area	No.
Impacts an Archaeological Priority Area	The site is within an Archaeological Priority Zone for West Barnes Farm, a Medieval, probably moated, 'Grange' belonging to Merton Priory. To the north is a Tier 2 Archaeological Priority
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	The site is within fluvial flood zones 2 and 3 and is at risk of surface water flooding.,
Is in a town centre.	No.
Is in an Opportunity Area	No.
Impacts a designated open space.	Yes.
Impacts an ecology designation.	Yes, the northern part of the site is adjacent to a Site of Interest for Nature Conservation (SINC) and a green corridor.
Public Transport Accessibility Level (PTAL)	PTAL ranges from 2 – 3, poor to moderate access to public transport.

SITE RP4: 80-86 Bushey Road, Raynes Park. SW20 0WJ



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Ward: Raynes Park

Site description:

The site consists of large-scale retail sheds ranging between two and five storeys in height, open parking areas and a demolish. Part of the site (the former Thales building) has been demolished. To the west is a new Next at Home store and the A3 'Beverly Way' dual carriageway and to the south is Bushey Road (A298). To the east of the site is West Wimbledon primary school. To the north, on the opposite side of Bodnant Gardens, are two-storey houses.

One of the largest brownfield underutilised site, single ownership sites in Merton with significant redevelopment potential.

Site owner: Friends Life Ltd (c/o Aviva Investors)

Site area: 2.7ha

Existing uses: Part vacant, part retail, office and employment use (light industrial)

Site allocation: Residential-led mixed use development with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area.

Site deliverability: 5-10 years

Indicative site capacity: 400 -550 new homes.

Design and accessibility guidance:

The area to the west of the site was delivered in 2017 with a new Next at Home store. Planning permission was previously granted on 4 December 2017 (16/P1317) for the redevelopment of the site for a substantial purpose-built retail floorspace (13,736 square metres), with cafe/restaurants (1,193 square metres), landscaping, associated car parking (334 spaces), cycle parking (100 spaces) and new pedestrian access from Bodnant Gardens.

Development of the site provides a significant opportunity for exemplary design to optimise the potential of this large site.

Development proposal will need to improve walking and cycling and access to public transport between the site and Raynes Park town centre. Cycling and walking routes must be created through the site which would also provide direct access from Raynes Park High School and homes to the south of Bushey Road to shops and services in Raynes Park town centre via Bodnant Gardens. Contributions may be sought towards improvements on the cycle and pedestrian network that connects to the site.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips, through appropriately managed car parking, deliveries and servicing.

Development proposals must protect the amenity of the adjacent homes and school.

Development proposals will need to incorporate suitable mitigation measures.

Due to the site's location relative to the A3 road, the layout, scale and land uses must protect future occupiers from the noise and air pollution arising from the road. This section of the A3 is identified on the Department for Transport noise map.

Access to the site is shared with the existing retailers at Next at Home. Careful, scrutiny of access and junction arrangements needed to minimise impacts on movement, congestion and road safety in particular wider impacts on Transport for London route network.

Transport assessments must consider the potential effects of the whole site to avoid ad hoc proposals, assessment and consideration.

Infrastructure Requirements:

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.

The site is close to the A3 which forms part of the Transport for London Road Network (TLRN). TfL recommends no new access or servicing take place from the A3.

The site is close to the A3 which forms part of the Transport for London Road Network- no new access or servicing should take place from the A3, advice from TfL.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, critical drainage area.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	No
Impact an ecology designation.	No
Public Transport Accessibility Level (PTAL)	PTAL 1, very poor access to public transport.

SITE RP5: All England Lawn Tennis Club Community Sports Ground 216 Grand Drive, Raynes Park, SW20.



Ward: Raynes Park

Site description:

This large site is privately owned and run by the All England Lawn Tennis club (AELTC). The site hosts tennis facilities including 16 grass courts, nine synthetic surface tennis courts (six of which are covered by two air domes), a clubhouse, changing rooms and parking. The site is part of the AELTC estate and is essential to supporting a successful Wimbledon Championships which is held on the AELTC site on Church Road. As well as supporting the Wimbledon Championships it is used by schoolchildren in Merton and Wandsworth via the Wimbledon Junior Tennis Initiative. It also has provision for residents to play tennis. The site is surrounded, on all sides by semi-detached and short terraces of houses. The site currently has single access from Grand Drive restricting vehicle access to the site.

Site owner: All England Lawn Tennis and Croquet Club (AELTC)

Site area: 7.9ha

Existing uses: Tennis facilities connected with AELTC's operation of The Wimbledon Championships and community and charitable activities.

Site allocation: Tennis facilities connected with AELTC's operation of The Wimbledon Championships, the Wimbledon Junior Tennis Initiative, community tennis programmes with support

for continued and long-term investment in the same. The site can be found in designated open space with sport and recreation use that are compatible with open space designation.

This site provides an opportunity for significant, sustained and long-term investment in sporting facilities in Merton to support The Championships and to provide access to the local community to aid in tackling health inequalities. Development of the site provides opportunities to optimise the use of an underutilised site for uses compatible with its current designation as playing fields.

Site deliverability: 0-5 years.

Design and accessibility guidance:

In 2018 planning permission was granted for a second tennis air dome containing three acrylic courts, 16 external grass courts associated landscaping and drainage and an outline planning application for a replacement clubhouse. In total the site hosts tennis facilities including 16 grass courts, nine synthetic surface tennis courts (six of which are covered by two air domes), a clubhouse, changing rooms and parking.

Opportunity to upgrade and improve AELTC's facilities to continue the prominence of The Championships and the opportunity to host more of the pre-Championship activities within Merton.

Development proposals should explore alternative access arrangements which could improve the site's resilience.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips.

Development proposals will need to continue to incorporate suitable mitigation measures to address the issues with the site and incorporate the recommendations in Merton Strategic Flood Risk Assessment.

Development proposal must protect the residential amenity of adjacent properties.

Opportunities for investment in sporting facilities that can be accessed by local people and support and create new jobs.

Opportunities to recognise The Wimbledon Championships significant economic and social benefits to Merton.

Opportunity in combination with the AELTC Church Road main site, to support the capacity of the Wimbledon Junior Tennis Initiative by providing better facilities for the free tennis coaching programme for primary school children in Merton and the neighbouring borough of Wandsworth.

Infrastructure Requirements:

The developer should contact SGN and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impact flooding from all sources.	Yes. The site has historically suffered from surface water drainage issues.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, the site is designated as Open Space and is near to Metropolitan Open Land (MOL).
Impacts on ecology designation.	Yes. The site is near to a Local Nature Reserve, Green Corridor and Site of Interest for Nature Conservation (SINC).
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

Site RP6: Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB.



Ward: West Barnes

Site description:

The site includes a fenced off field, accessible from Meadowview Close. Within the northeast corner of the site lies a small playground that is closed off to general the public use and described as only being available for the use of the residents living on Meadowview Road

To the north of the site are 44 homes along Meadowview Road and Raynes Park Tennis Club, built by 2013 as part of a single scheme which allowed the redevelopment of homes on open space if the development funded sports facilities. The site is surrounded by short terraced line of a formal street layout with some grass verges and street trees.

The rear windows and gardens of terraced houses or flats overlook the site on the eastern, southern and western boundaries.

Site owner: Bellway Homes.

Site area: 2.8ha

Existing uses: The site is currently fenced off and a vacant field. The consultee’s submission states that the field has been secured to prevent it falling to disrepair, that there is no interest in the site being used solely as sports fields and that the legal obligations relating to the previous planning permission (2009) which required the field to be offered as a sporting facility, maintained or provided as open

space have all expired.

Site allocation: Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered

Site deliverability: 0-5 years

Design and accessibility guidance:

The landowner submitted a planning application for a mixture of new homes and tennis facilities to Merton Council in October 2020 (reference 20/P3237).

The site has an extensive planning history. It was part of a larger site that was granted planning permission on appeal in 2009 for the redevelopment of the site to provide:

- 44 homes (along what is now Meadowview Road).
- new tennis courts and clubhouse for the relocated Raynes Park Tennis Club – sports provision (on this site proposal) offered to Merton Council or Kings College School

Development of the site may provide opportunities for entire site sports use.

Development proposals will need to maximise the accessibility of the site by sustainable travel modes and demonstrate that proposals will minimise the impact of vehicle trips.

Development proposals should maximise opportunities to provide publicly accessible cycle and pedestrian routes across the site including protecting and enhance the existing route that runs along the northern boundary of the site.

Development proposals for sports use or other uses compatible with the designated open space should be actively demonstrated prior to any alternatives being taken forward.

Development proposals must incorporate the recommendations of Merton's Strategic Flood Risk Assessment. Development proposals must ensure that the drainage on the site will have to be improved and addressing the likelihood of fluvial flooding and the critical drainage area.

Development proposals should protect the amenity of surrounding residents.

Infrastructure Requirements:

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure; however, the scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and

public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, part of the site is within flood zone 3 and within a critical drainage area.
Is in a town centre.	No
Is in an Opportunity Area	No
Impacts a designated open space.	Yes, the site is designated as open space.
Impacts an ecology designation.	No.
Public Transport Accessibility Level (PTAL)	PTAL 1, very poor access to public transport.

SITE RP7: Rainbow Industrial Estate Grand Drive, Raynes Park, SW20 0JY



Ward: Raynes Park

Site description: The site is an industrial estate to the south of Raynes Park town centre. It is bounded on all sides by railway lines originating from Raynes Park station. There is some residential development at the other side of the railway lines to the west of the site of an office building (now a church) and a residential development of 4 storeys. To the east are inter-war terraces and towards the south is Bushey Court, a residential block of 4 storeys.

Site owner: Workspace 12 Ltd.

Site area: 1.88ha

Existing uses: Industrial sheds, storage, car/van hire, coach parking, car repairs, skip hire etc.

Site allocation: Employment led regeneration in line [Rainbow Industrial Estate planning brief](#), including public realm improvements close to Raynes Park station. Proposed allocation to clarify the existing planning approach.

Deliverability: 10-15 years

Indicative site capacity: 200- 225 new homes.

Design and accessibility guidance:
The Rainbow Industrial Estate planning brief is a design and planning framework to guide the redevelopment of the Rainbow Industrial Estate. The brief's general requirements for the redevelopment of the site is to provide approximately 3400m² of business floorspace for Small and

Medium sized enterprises (SME's), a publicly accessible drop off point ('Kiss and Ride') for Raynes Park railway station, and the provision of up to 250 new homes.

Planning permission was granted in 2015 (refs: 14/P4287 and 14/P4188) for 224 residential units and 3,449sqm of commercial floorspace and for the provision of a 'kiss and ride'. The scheme is now being phased and the business floorspace and kiss and ride have been implemented.

Opportunity to create a sense of place and identity out of this almost invisible site. and opportunities set out in the planning brief and addressed in planning permission (14/P4287).

Infrastructure requirements:

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is next to a proposed Crossrail2 station and rail tracks proposed for upgrade by Crossrail2, (should Crossrail2 be fully funded). The council and TfL require engagement and cooperation with the Crossrail 2 safeguarding team on the delivery development proposals for this site.

Thames Water has identified the scale of development/s is likely to require upgrades to the water supply and wastewater network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location

Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area	Yes
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, site is in a critical drainage area.
Is in a town centre.	Very close to Raynes Park town centre.

Is in an Opportunity Area	No
Impacts a designated open space.	No.
Impacts an ecology designation.	Yes, Site of Interest for Nature Conservation (SINC) and Green Corridors.
Public Transport Accessibility Level (PTAL)	PTAL 4 -5, good to very good access to public transport.

SITE RP8: West Barnes Library 10 Station Road, Motspur Park, KT3 6JF.



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Ward: West Barnes
Site description: The site has a single storey building tucked away behind Motspur Park Station. To the west the site is bounded by railway line. To the east there is two to three storey office building.
Site owner: Merton Council
Site area: 0.1ha
Existing uses: Library
Site allocation: Library with residential on upper floors
Site deliverability: 5-10 years.
Indicative site capacity: 10-15 new homes.
<p>Design and accessibility guidance: A library service/function is to be kept.</p> <p>Cabinet agreed to progress with development of the site with a new and improved library presence in 2014. Plans were paused whilst consultation took place about the impact of Crossrail2 development on the local area. Further feasibility work is currently being progressed.</p> <p>A mixed -use development of the site provides an opportunity to facilitate the provision of an upgraded community uses on lower floors and create a more secure, safe and active environment.</p> <p>Development proposals will need to increase customer floor area, provide an adaptable suitable modern space with added space for community use and provide housing on the upper floors.</p>

Development proposals will need to be sensitive to the railway lines and mitigate parking, traffic and road safety impacts on neighbouring residents.

Development proposals should contribute towards improving the public realm around the station for cyclists and pedestrians including the provision of improved publicly accessible cycle parking facilities for users of the library and station.

Development proposal must incorporate the recommendation of Merton’s Strategic Flood Risk Assessment. The railway embankment acts as a barrier to surface water flow through the centre of the critical drainage area. Historic surface water flooding records identify drainage network capacity issues which cause water flooding in this area during heavy rainfall.

Infrastructure requirements:

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

The site is next to a proposed Crossrail2 station and rail tracks proposed for upgrade by Crossrail2, (should Crossrail be fully funded). The Council and TfL require engagement and cooperation with the Crossrail 2 safeguarding team on any development proposals for this site.

A project to implement step free access at Motspur Park station would likely impact land directly to the rear of the site and there is a requirement for consultation and cooperation with Network Rail in relation to this.

Thames Water does not envisage infrastructure concerns for the water supply network. However, Thames Water has identified the scale of development/s is likely to require upgrades to the wastewater network and sewage treatment infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.

Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of liaising with Thames Water with any submitted planning application. Merton Council will also liaise with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

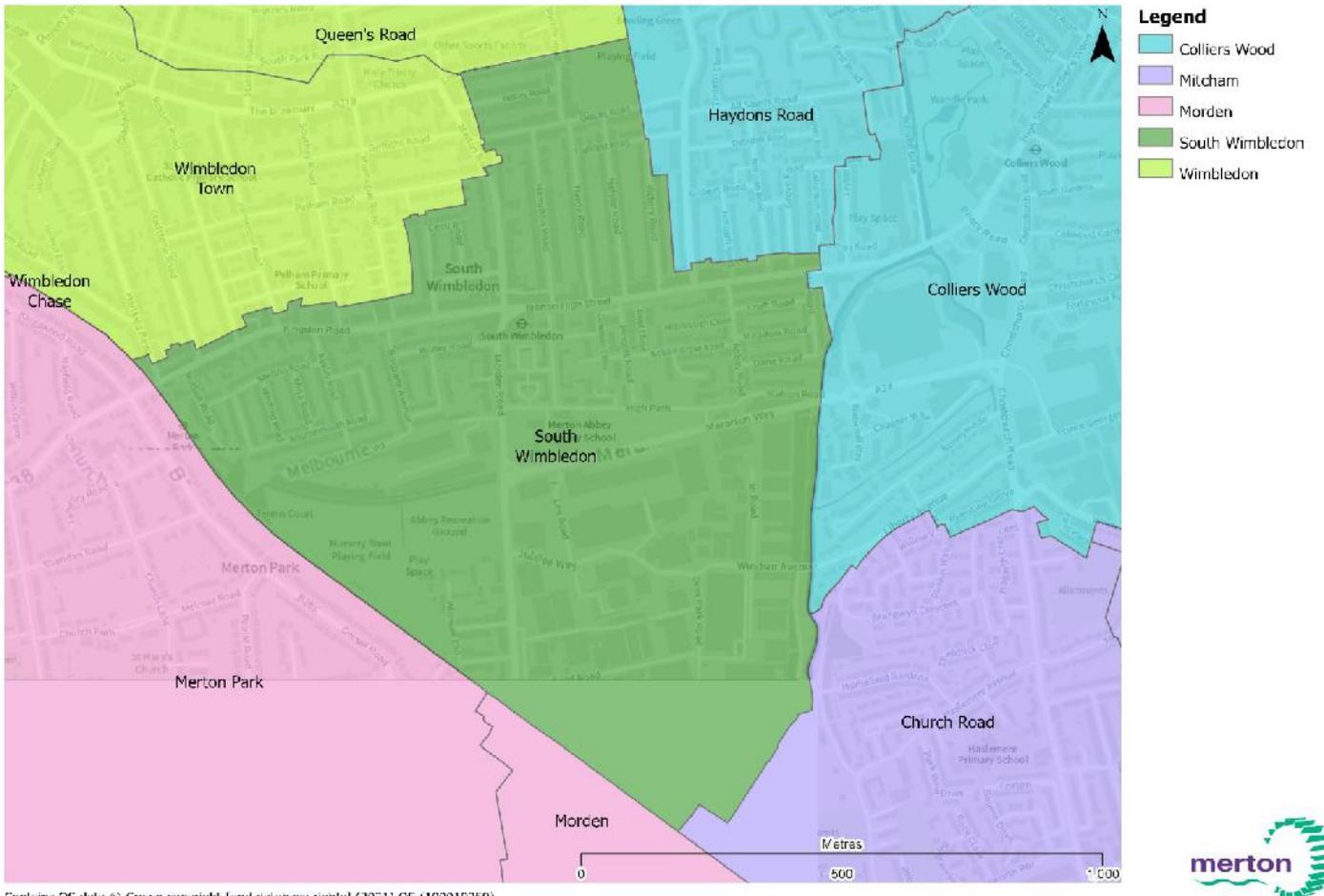
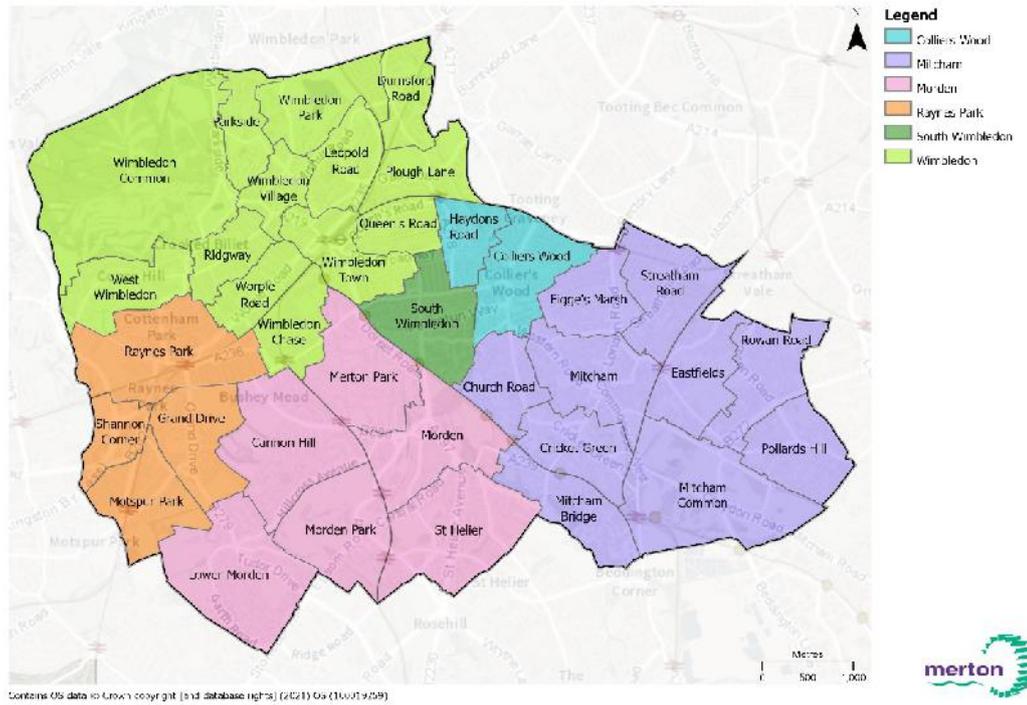
The site location

Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	No
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Yes, site is in flood zone 2 and within a critical drainage area.
Is in a town centre.	Yes.

Is in an Opportunity Area	No
Impacts a designated open space.	No
Impacts on ecology designation.	Yes, green corridor.
Public Transport Accessibility Level (PTAL)	PTAL 2, poor access to public transport.

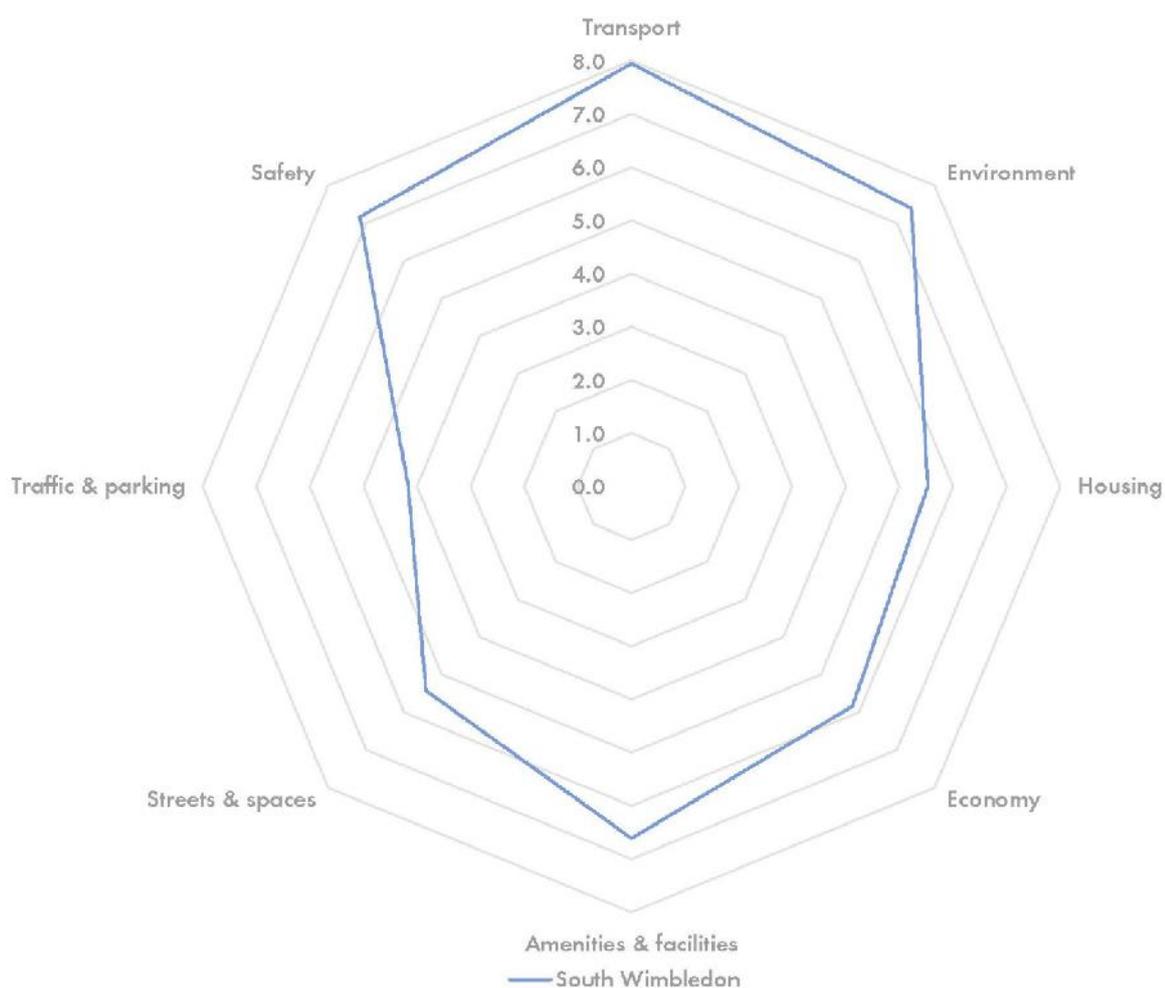


03.5. SOUTH WIMBLEDON



PLACE PROFILE: SOUTH WIMBLEDON

Earlier in 2020, as part of the Borough’s ongoing Character Study, 415 Merton residents took part in this survey, of which 19 people told us they lived in South Wimbledon. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. More information will be published in Merton’s Borough Character Study (due to be published at the end of the year).



Results from residents of South Wimbledon rating their neighbourhood

KEY OBJECTIVES: SOUTH WIMBLEDON

The following objectives provide an overarching vision for South Wimbledon.



Improving public realm and public space

Support improvements to streetscene and shopfronts, improving the public realm, particularly for pedestrians and cyclists.



Improving the environment

Encouraging measures that help to minimise and mitigate pollutants associated with the busy road network, including planting and green cover.



Promoting the town Centre

Proposing a new Local Centre at the heart of the South Wimbledon, focussed around the Underground station and junction.

CHARACTER: SOUTH WIMBLEDON

These photos illustrate the diverse character found across South Wimbledon.





SOUTH WIMBLEDON: POLICY N3.5

Recognising South Wimbledon as a distinctive neighbourhood in its own right

We will do this by:

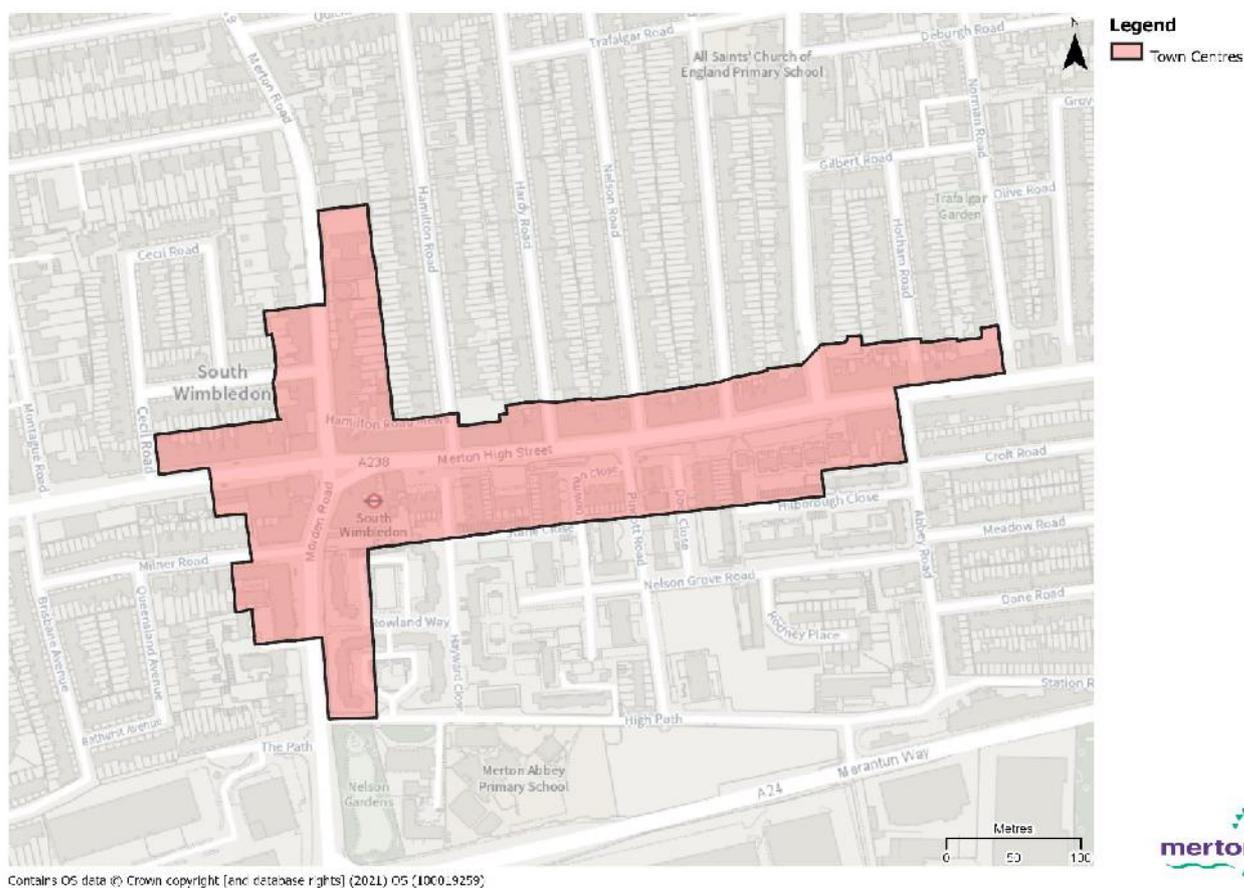
- a. Proposing a new Local Centre at the heart of the South Wimbledon, focussed around the underground station and the junction where Morden Road, Merton Road, Kingston Road and Merton High Street meet;
- b. Supporting shops, services and businesses commensurate with a local centre, particularly those that serve the day-to-day needs of local residents;
- c. Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation;
- d. Support developments that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;
- e. Supporting measures to enhance the streetscene and public realm in South Wimbledon, particularly along the main roads where most travel takes place;
- f. Encouraging measures that help to minimise and mitigate pollutants associated with the busy road network, including planting and green cover, measures to encourage walking and cycling and, electric vehicle charging points;
- g. Protecting and enhancing the public open space at Nelson Gardens and improving links to Abbey Rec, Wandle Park and other nearby open spaces
- h. Support development commensurate with the excellent public transport access of the area
- i. Support improvements to the transport infrastructure that will help to reduce road congestion and improve the public realm, particularly for pedestrians and cyclists;
- j. Work with the regeneration phases being delivered on the High Path estate over the next 10-15 years, guided by the Estates Local Plan; this includes the proposed public park at High Path;
- k. Supporting the redevelopment at South Wimbledon station which respects and enhances the listed building and encouraging a public space and secondary pedestrian entrance to the underground station off the busy main roads.

JUSTIFICATION

- 3.5.1.** South Wimbledon lies at the centre of Merton; in previous Local Plans the area has been subsumed into Colliers Wood or Wimbledon. However, there are now a number of factors that support South Wimbledon being considered a defined Local Centre in its own right and the council proposes to take this forward through this new Local Plan. These factors are set out below.
- 3.5.2.** It is clear from the responses to the consultation and the work started by the community-led South Wimbledon Enhancement plan that residents consider South Wimbledon as a neighbourhood with its own distinctive character.
- 3.5.3.** The area has a very strong historical context. Although there are limited remnants that are easily visible above ground, there are many distinctive historical references to be found in structures, buildings and local gardens in the area. Admiral Lord Nelson's "Paradise Merton" estate was located where High Path now stands and St John the Devine Church and Nelson Gardens were both created to commemorate the anniversary of Nelson's death. South Wimbledon station building and Rodney Place cottages are both heritage assets directly connected to the advent of London Underground. The surrounding residential areas have distinctive characters and built form in themselves (e.g. the "Battles" roads of Victorian / Edwardian terraces, the "Australias" to the west, the High Path estate itself) and these design standards are occasionally reflected on Merton High Street and Kingston Road. These residential neighbourhoods are, in appearance, distinct islands of development except where they meet the main road frontage. We therefore support residents in trying to create a more cohesive, integrated South Wimbledon local centre, based around the South Wimbledon junction.
- 3.5.4.** Like other Local Centres, the function of South Wimbledon is to provide local shops and services for people that live nearby so that households can access these by walking or cycling, reducing the need to travel far or to travel by vehicle. We recognise that the way we shop is changing, and rapidly. The increase in online shopping, the recent rise of food delivery apps and changes to national rules to allow small shops throughout England to convert to flats without planning permission is changing the economic viability and occupation of shopfronts.

- 3.5.5. Across London there has been a contraction the numbers of shops along main road arteries, slightly offset by a rise in cafes and restaurants around transport hubs which can serve both passing customers and the wider area via online food delivery apps. Kingston Road in particular has seen several small shops convert to flats outside the planning system; there are some good examples and some extremely poor examples of the resultant shopfronts.
- 3.5.6. In considering the opportunities for South Wimbledon as a local centre, the council considered several options for the extent of the local centre boundary. The Local Centre boundary focusses on South Wimbledon junction encompassing shopping parades in all directions where shops and services are most likely to be viable due to the higher footfall. However, there may be other options for the boundary and we would welcome comments on this.

Proposed Local Centre boundary for South Wimbledon:



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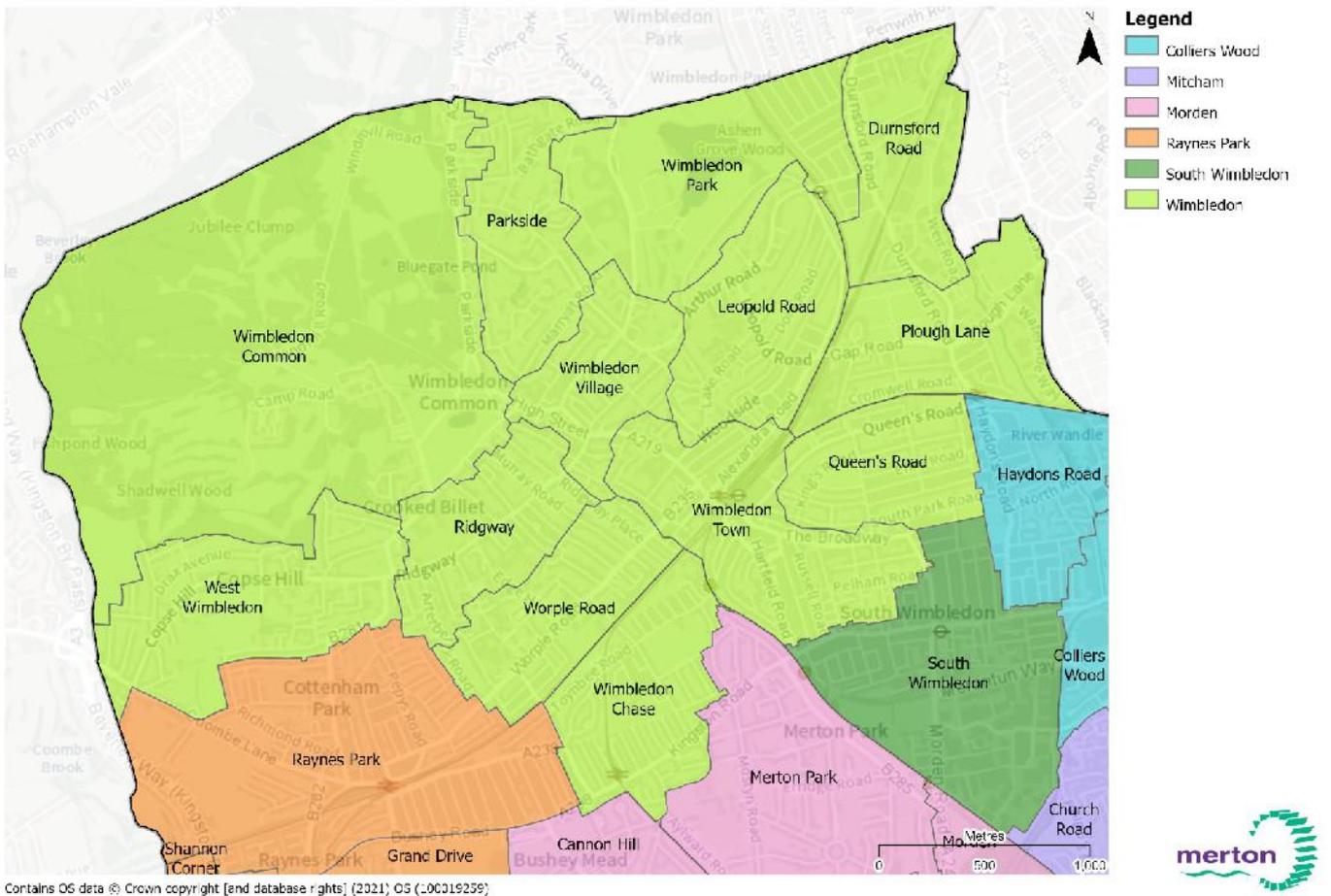
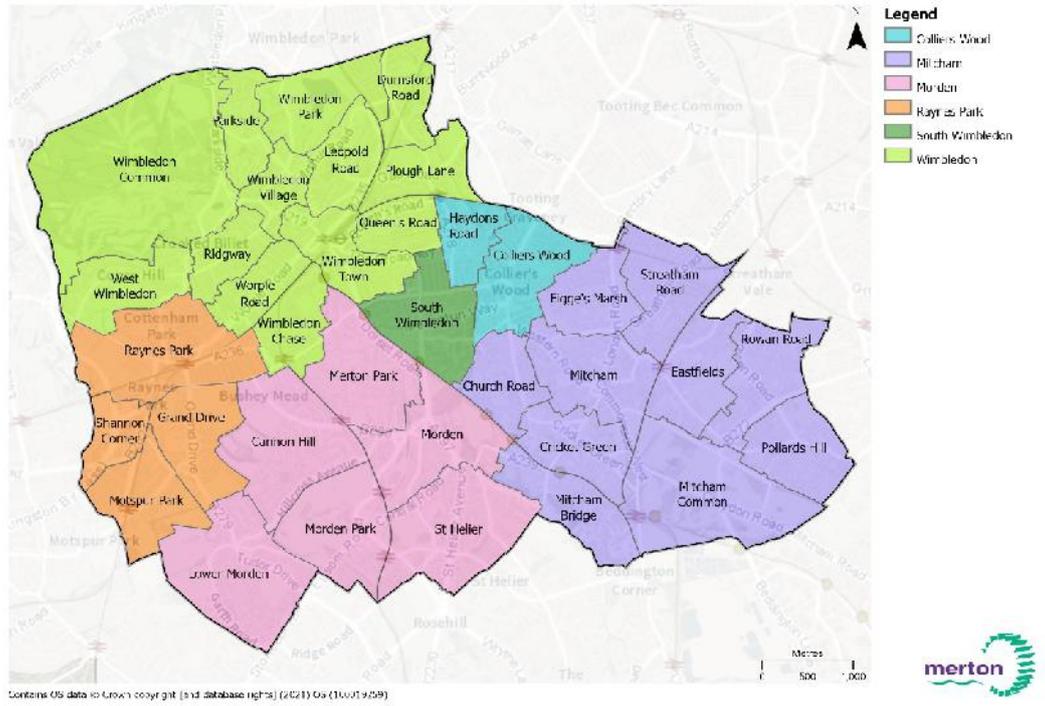
- 3.5.7.** There are a wide variety of different businesses fronting the main roads around South Wimbledon. Many are small supermarkets or food shops, cafes, restaurants and hot food takeaways. We will continue to support businesses commensurate with the Local Centre. We recognise the larger number of hot food takeaways in South Wimbledon and the links to childhood obesity, in accordance with other policies in the plan, will not support further takeaways where there is already an over-concentration.
- 3.5.8.** People are more likely to use local shops and services if they are in an attractive setting, if the walking or cycling route to reach them looks good and feels safe. While many of the surrounding local streets are attractive with properties that are generally well cared for and maintained by their occupants, the busy arterial roads are noisy, heavily trafficked and don't have the same sense of place as exists in the surrounding neighbourhoods.
- 3.5.9.** To help create a better sense of place at the junction around South Wimbledon underground station junction, we will support development and public realm improvements that soften the look and feel of the Local Centre, reference the historic and local character of the surrounding areas, provide development standards (e.g. building orientation, insulation, winter gardens etc.) that helps mitigate the road issues). Additional transport info? We recognise that in the long term the South Wimbledon junction needs active travel improvements and a reduction of traffic dominance on Merton High Street. However, South Wimbledon does benefit from several long standing successful low traffic neighbourhood schemes, that create a pleasant walking and cycling environment away from Merton High Street. There are alternative links on quiet streets with permeable connections through to CS7 and the Wandle trail.
- 3.5.10.** The council will also encourage businesses and residents to restore or redevelop building facades to a high standard. South Wimbledon is rich in architectural history, such as the Victorian detailing found on many buildings which give the area a distinct character; development proposals should reflect existing elements or interpret them in a modern way. Merton's shopfront design guide provides practical information about how to assess, design, and maintain a successful shopfront and can be used regardless of the occupier of the building.

- 3.5.11.** Consultation responses to the Local Plan at stage 1 and prior to the Local Plan have called for more public space to be created around South Wimbledon. Nelson Gardens along Morden Road is perhaps too far away from the station and the areas of highest footfall to be well used. Proposals for the High Path estate, as guided by the Estates Local Plan and set out in the approved Outline Planning Application, will provide a new public park as well as smaller pockets of landscaped space within the estate. However aside from the regeneration of High Path there are no large sites in the immediate South Wimbledon area adjoining the main roads and so there is more limited opportunity for the creation of new public space with close proximity to where most people use the Underground Station, shops and services and would benefit the most.
- 3.5.12.** The council therefore supports the creation of small pockets of well-designed public space close to South Wimbledon underground station where they are most likely to provide opportunities for pause away from the busy main roads.
- 3.5.13.** Although a third of Merton is made up of parks, commons and other open spaces, South Wimbledon has more limited open space provision than most of the rest of Merton. Some of the nearest public open spaces for South Wimbledon residents are at Nelson Gardens, Abbey Recreation Ground and Haydon's Road Recreation Ground and parts of South Wimbledon are in easy walking distance of the Wandle Trail. Where development proposals cannot provide sufficient open space on site, they may be expected to contribute to improvements at nearby open spaces.
- 3.5.14.** The regeneration of the High Path estate will take place in phases over the next 15 years. This investment will result in the most substantial change to the layout, function and character of High Path. While the Estates Local Plan 2018 provides the planning framework to guide this regeneration, it will also deliver key proposals that South Wimbledon respondents have called for, including a public park fronting Merton High Street, a new layout fronting Merton High Street with new shopfronts and business space; investment in landscaping and the public realm.

- 3.5.15.** As set out in Merton's Estates Local Plan 2018, the detailed design of the regeneration at High Path must create a strong character, particularly fronting Merton High Street and provide high quality landscaping and urban greening. New development proposals must also have regard to the proposed regeneration at High Path as well as this plan, to ensure that South Wimbledon is developed as a cohesive, attractive and legible neighbourhood. Before designing new schemes, potential applicants for schemes within the vicinity of the High Path estate are advised to refer to the High Path section of Merton's adopted Estates Local Plan 2018 and to contact the applicants of the outline planning application 17/P1721 (Clarion Housing Group) to ensure co-ordination of site designs, uses, materials and movement.
- 3.5.16.** South Wimbledon Business Area (also known as Morden Industrial Area) to the south forms part of Merton's Strategic Industrial Locations and is one of Merton's most popular and best occupied estates for businesses throughout south London. Developments will be supported that retain or improve the area for employment purposes, especially those catering for modern business accommodation. Development that could locate in town centres such as retail or offices that are not ancillary to other development will be resisted, in order to minimise potential conflict with the HGVs and extended business operational hours required in a modern economy.

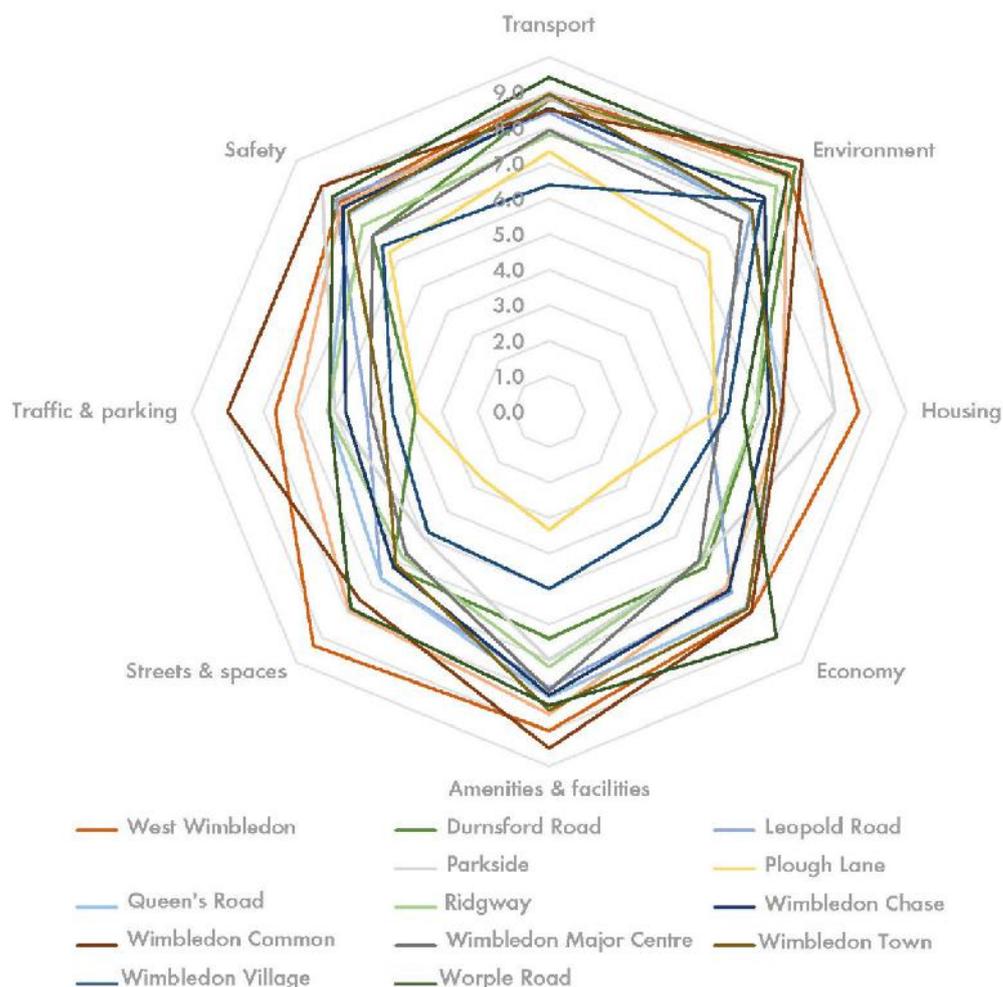


03.6. WIMBLEDON



PLACE PROFILE: WIMBLEDON

As part of the Borough’s ongoing Character Study, 415 Merton residents took part in this survey, of which 136 people lived in Wimbledon. The diagram below highlights how people felt about their neighbourhood based on a series of questions asked. This work was also used to inform the Borough Character Study 2021.



Results from residents of Wimbledon rating their neighbourhood

KEY OBJECTIVES: WIMBLEDON

The following objectives provide an overarching vision for Wimbledon.



A vibrant town centres.

Encourage appropriate development to support businesses and attracts visitors and tourism to the area all year round.



Greening Wimbledon

Enhance the experience of Wimbledon by requiring exemplary design and landscaping, street scene and public realm investment.



Conserving character

Maintain the unique character and built form of the areas surrounding the Town Centre by supporting development of high quality that is commensurate with the scale.

CHARACTER: WIMBLEDON

These photos illustrate the diverse character found across Wimbledon.





WIMBLEDON: POLICY N3.6

Wimbledon Town Centre

To ensure that Wimbledon continues to be a thriving destination for businesses, residents and visitors.

We will do this by:

- a. Promoting Wimbledon as south west London's premier location for business, leisure, living and culture: an exemplar for good quality and sustainable placemaking.
- b. Driving investment and innovation in workspaces to support the local economy and jobs in the town centre commensurate with Wimbledon's role as a major centre. Encourage development that attracts businesses, visitors and tourism to the area all year round, including high quality hotels, conference facilities and cultural activities.
- c. Enhancing the experience for people coming to Wimbledon commensurate to its international reputation by requiring exemplary design and landscaping, street scene and public realm investment, taking opportunities to green Wimbledon.
- d. Supporting high quality architecture and design with traditional urban blocks with active frontages.
- e. Respecting views from Wimbledon Hill through the town centre and beyond, with taller developments set away from the historic core, located around the station, St George's Road, Hartfield Road and Broadway East.
- f. Strengthening the position of Wimbledon as a Major Centre in south London through the redevelopment of key sites within the centre.
- g. Promoting a vibrant daytime, evening and night time economy through a mix of commercial and community uses.
- h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and

participate in the town centre, as set out in the public space framework in the Future Wimbledon SPD.

- i. Improving health and wellbeing by promoting walking and cycling: making the town centre more attractive, greener, safer, easier to get around for pedestrians and cyclists.
- j. Securing investment in Wimbledon station to improve the passenger experience and reduce severance with new bridges over the railway. Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.

Surrounding neighbourhoods of Wimbledon

- k. Maintaining the unique character and built form character of Wimbledon Village, supporting development that is commensurate with the scale and the significant quality of this Local Centre.
- l. Supporting development that attract greater footfall and boost the visitor experience to Wimbledon Village and Arthur Road Local Centres;
- m. Supporting environmental improvements and maintaining the day-to-day shopping and other services at Arthur Road Local Centre;
- n. Supporting improvements to business premises and the public realm in Haydons Road to bolster local high street offer.
- o. Conserving and enhancing the quality of neighbourhoods within the neighbourhoods through Conservation Area character protection, and by supporting incremental development that respects the character and heritage assets within the area;
- p. Supporting proposals to improve walking and cycling between the neighbourhoods of South Wimbledon, Colliers Wood, Wimbledon, Wimbledon Village, Raynes Park, Wimbledon Chase and outside the borough to Tooting, Southfields and Kingston.

- q. Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally.

JUSTIFICATION

- 3.6.1.** Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only major town centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure.
- 3.6.2.** The Future Wimbledon Supplementary Planning Document (SPD) 2020 outlines the priorities for Wimbledon town centre:
- **Design quality** - Design quality underpins good growth. The future of Wimbledon should draw inspiration from its past. With many existing high quality listed buildings, future development should enhance their character and setting. Buildings should respond to the principles and materials from their context. Careful consideration to building heights and scale must be given, in particular when relating with heritage assets and views from neighbouring conservation areas.
 - **Public realm** - Spaces to dwell, socialise and relax are vital for the life of a town centre and the wellbeing of people. Wimbledon does not currently have many public spaces. The piazza is the main focus for outdoor events and markets. Feedback from the public suggested spaces such as a new town square and multiple smaller spaces are desirable.
 - **Urban greening and sustainability** - Creating a sustainable and environmentally focused town centre was highlighted as a key priority during consultation. The redevelopment of the town centre gives Wimbledon the opportunity to be a leader in sustainable design. Sustainable drainage systems should be used where possible and planting species that improve air quality and biodiversity should be integrated into the

design of the public realm.

- **Future of the high street** - Wimbledon already has a variety of uses spread across the town centre. However, feedback from the consultation suggested that the public would welcome more uses that compliment what is already existing. Suggestions such as spaces that provide opportunities for independent shops and affordable workspaces were mentioned as uses that would add to the vibrancy and vitality of the town centre and in the shorter-term assist with post-covid recovery.
- **The station and railway** - There are long term ambitions to overcome the severance caused by the railway tracks, therefore creating a more accessible and connected town centre. Consultees highlighted the need to reduce traffic dominance throughout the town centre and to humanise the public realm. A world class station that has a sense of arrival with access to rail, underground, tram and buses was desired.

- 3.6.3.** A fundamental theme throughout the engagement on the Future Wimbledon SPD, workshops, landowners' forums and responses to planning applications, community feedback and general participation in civic life has been the desire to improve the look and feel of Wimbledon town centre and the quality of the experience people have there, commensurate with the Wimbledon / SW19's international reputation. The Wimbledon area has a rich historical significance with high quality neighbourhoods and open spaces including Wimbledon Common. The town centre itself has pockets of well-loved and well-designed buildings but also parts that do not reflect the quality of the surrounding area.
- 3.6.4.** Improvements to the public realm, street scene with more business and professional services and quality shops, balanced with community, leisure, arts, culture and associated facilities including tourism will achieve a noticeable uplift in the quality of the centre.
- 3.6.5.** Greening Wimbledon, whether by creating new landscaped pocket parks within a new development or by adding planters, street trees or climbers to existing spaces, is a key priority. Greening has multiple benefits: it can improve the attractiveness and sense of calm and safety of a place, particularly for pedestrians, it adds to visual interest and it can benefit air quality. The Council will encourage all developments in Wimbledon to optimise the greening of their site and the creation of parklets and other human-scale spaces for people to enjoy. We will support measures outside the planning system that help make

Wimbledon more attractive and foster a sense of community ownership, such as the re-use of planters and community planting of street trees.

- 3.6.6.** We need growth in Wimbledon, and we need to plan it to secure the best quality we can for our town centre. Wimbledon is a long, linear town centre set at the bottom of Wimbledon Hill and tightly bound by attractive established residential terraces, some of which are within Conservation Areas. With the exception of development sites at Dundonald Yards and Gap Road that will only be unlocked by Crossrail2, Wimbledon has no scope to accommodate growth by expanding outwards. The local topography and quality townscape mean that Wimbledon is not suitable for high rise towers therefore to accommodate growth in keeping with the area, sites within Wimbledon town centre need to become denser and accept a moderate increase in heights.
- 3.6.7.** The Council encourages dense mid-rise urban blocks similar to those of Bloomsbury where heritage assets are complemented by new buildings of quality design.
- 3.6.8.** Views through the town centre and beyond from Wimbledon Hill will be respected, with taller developments set away from the historic core, located at the station, St George's Road and Broadway East.
- 3.6.9.** New developments should contribute to creating great streets and spaces. We experience cities at ground level and street activation is key to a successful place. Interpreting Victorian detailing is important for shop fronts, whatever the end occupier. More advice on designing a quality shopfront can be found in Merton's shop front design guide 2017.
- 3.6.10.** Developers who look to build in Wimbledon must demonstrate a commitment to quality and design. Great contemporary design and materials that reflect, respect and enhance the historic buildings is encouraged.
- 3.6.11.** Growth can be achieved by occupying more of the site and adding floors. The Council will also support the redevelopment or refurbishment of offices and other buildings,

usually built since the 1960s that are nearing the end of their useful life.

- 3.6.12.** In the future, Crossrail 2 will be a key driver of change in Wimbledon. In particular, it will open up new opportunities for creating new public space around the station and improving links across the railway lines, helping to create more space for cycling and walking and alleviating congestion currently on and around Wimbledon Bridge.
- 3.6.13.** However, at this stage it is likely that Crossrail 2 will not be completed prior to 2040, outside the lifetime of this Local Plan. Should Crossrail 2 preparation progress during the lifetime of this Local Plan, we will work with everyone in Wimbledon, including Love Wimbledon, residents, the Crossrail 2 team, Network Rail and others to ensure that the solution for Crossrail 2 at Wimbledon station is the best result for Wimbledon and Crossrail 2, not only the train service.
- 3.6.14.** Passengers using Wimbledon station experience congestion and it is not easy to navigate, particularly at peak times, and the look and feel of the station has not been improved even though it serves a vast number of passengers through train, tram and underground. While Crossrail 2 remains at the planning stage, we will seek greater investment in Wimbledon station and its surrounds, helping to improve the attractiveness, movement and services within the station for the increasing number of visitors.
- 3.6.15.** As set out in Policy N1. Colliers Wood, the London Plan proposes an Opportunity Area at *Wimbledon / South Wimbledon / Colliers Wood*, an indicative aim to provide 5,000 homes and 6,000 jobs. Prior to Crossrail2's opening, for the lifetime of this Local Plan it is likely that many of the opportunities for delivering new homes will be realised through the regeneration of Morden and on sites within Colliers Wood and the wider Wimbledon area.
- 3.6.16.** Wimbledon offers a range of shop types and sizes that enhance its character and distinctiveness, from smaller shopfronts that are part of South Park Gardens conservation area, fronting the Broadway to purpose built spaces such as Centre Court and Victoria Crescent. Although planning policies can't specify the brand, quality or ownership of any retailer, having a range of different sized and types of premises helps to support a greater variety of town centre offers.

- 3.6.17.** We will maintain and enhance the retail core of the centre, especially within the Primary Shopping Area around the Wimbledon Station and Centre Court Shopping Centre to ensure that the centre remains competitive and meet the needs of visitors.
- 3.6.18.** However, we recognise that consumer behaviour is changing rapidly. While this is having a seismic impact on the traditional high street retailers, improvements in the speed and management of servicing and deliveries are increasing the viability of niche stores and smaller restaurants.
- 3.6.19.** To ensure Wimbledon remains competitive and is resilient in this challenging environment, we will continue to support development which enhances the shopping offer and retail experience in Wimbledon while working with landowners to ensure that eventually all shopfronts can support a range of different activities inside the premises, whether shops, restaurants, leisure, cultural or a mix of all the above. As set out in the Local Plan's transport policies, we will also plan for the changes to pick-up, delivery and servicing that has come with multi-channel shopping, such as motorbike collection and drop off space.
- 3.6.20.** Wimbledon town centre accommodates the majority of major office development in the borough, presenting as an attractive location for investment in south-west London. There are two distinct clusters of office development around Wimbledon Bridge and Worple Road, and a developing cluster east of the station along The Broadway. We will continue to support the development or refurbishment of major offices in these locations, including for flexible working. Due to its location with easy access by public transport, strong, recognisable name and attractive surroundings for homes, schools, recreation and leisure, Wimbledon is expected to be a more resilient location for offices than central London should the trend be for greater flexible working.
- 3.6.21.** Despite its proximity to central London, the tennis championships and its significant leisure and cultural pursuits and associated valued status Wimbledon lacks quality hotel accommodation. Quality hotel and conference space is encouraged as a means to boost the business and tourist trade in the area and attract visitors to Wimbledon all year round.
- 3.6.22.** Evening night-time activity, including leisure, entertainment and cultural activities can

play a significant role in supporting the local economy in Wimbledon and ensuring that the centre serves a wide range of users.

- 3.6.23.** A balanced approach is however needed to ensure that the competitive advantage that the night-time economy offers the centre is recognised, as well as ensuring that the potential negative impacts in relation to noise, disturbance and anti-social behaviour are addressed.

Surrounding neighbourhoods

- 3.6.24.** Wimbledon Village is a Local Centre with a unique and attractive environment: high quality physical fabric and landscaping, protected by Conservation Area designations. It has a rich heritage and period buildings, a golf course, riding trails, book fairs and horse and dog show, set against the backdrop of Wimbledon Common.
- 3.6.25.** Unlike other Local Centres it has few grocery stores but several high end 'chic' comparison retailers, cafés and restaurants, with business, legal and other commercial firms operating from upper floors. Wimbledon Village is not directly served by rail but is close to Wimbledon town centre.
- 3.6.26.** It attracts high quality comparison brands, however in the long term it also needs to be economically resilient and adaptable to changing consumer habits. While households in the surrounding residential areas have very high spending power, these beautiful neighbourhoods are relatively low density so there are fewer consumers living locally than in other parts of south west London.
- 3.6.27.** Businesses in the Village attract additional footfall from visitors to the nearby attractions of Wimbledon Common and the All England Lawn Tennis Club (museum and Championships) all year round, higher during the championships. The Wimbledon Village Business Association's priorities are to promote Wimbledon Village as a commercial centre and as a visitor destination and to enhance the environment and amenity of the Village.
- 3.6.28.** The approach for Wimbledon Village is to maintain the uniqueness of the centre by supporting development that is commensurate to the scale and quality of the Local

Centre.

- 3.6.29.** Arthur Road is a smaller, more compact Local Centre than Wimbledon Village, serviced by Wimbledon Park tube station on the District Line. It provides grocery and other facilities that cater for the day-to-day needs of residents. We will continue to support environmental improvements and the convenience nature of the centre.
- 3.6.30.** Haydons Road runs from South Wimbledon to Plough Lane and is generally characterised by late Victorian terraces with later infill development. Haydons Road rail station gives access to Wimbledon, Sutton and central London. There are designated neighbourhood parades along Haydons Road but like many London arterial roads, many former shopfronts have been converted into residential uses. Merton's Shopfront Guide 2017 provides useful information for applicants to improve the restoration or design of their shopfront. Chapter 8 of the guide can be used to help design an attractive frontage at street level if the owner is converting the property into residential use. We will support planning applications that improve shopfronts and business premises along Haydons Road and improve the public realm.
- 3.6.31.** The attractive terraces immediately surrounding Wimbledon town centre, some of which are within Conservation Areas, will be protected for residential amenity by focusing town centre activity within its boundaries, and by partnership working on public protection measures including community safety and public realm improvements.
- 3.6.32.** The high-quality residential areas to the north and west of the town centre will continue to be conserved and enhanced by enforcing conservation area designations, and ensuring that new development responds to the scale, historic value and distinctive character of these neighbourhoods.
- 3.6.33.** The wider Wimbledon area is relatively compact and close to other neighbourhoods in Colliers Wood, South Wimbledon, Southfields, Tooting, Raynes Park, Morden, Kingston and beyond. We will encourage proposals that enhance walking and cycling across south London, requiring large sites to be permeable and support public access.
- 3.6.34.** The Wimbledon Tennis Championships is a world-class sporting event and is important

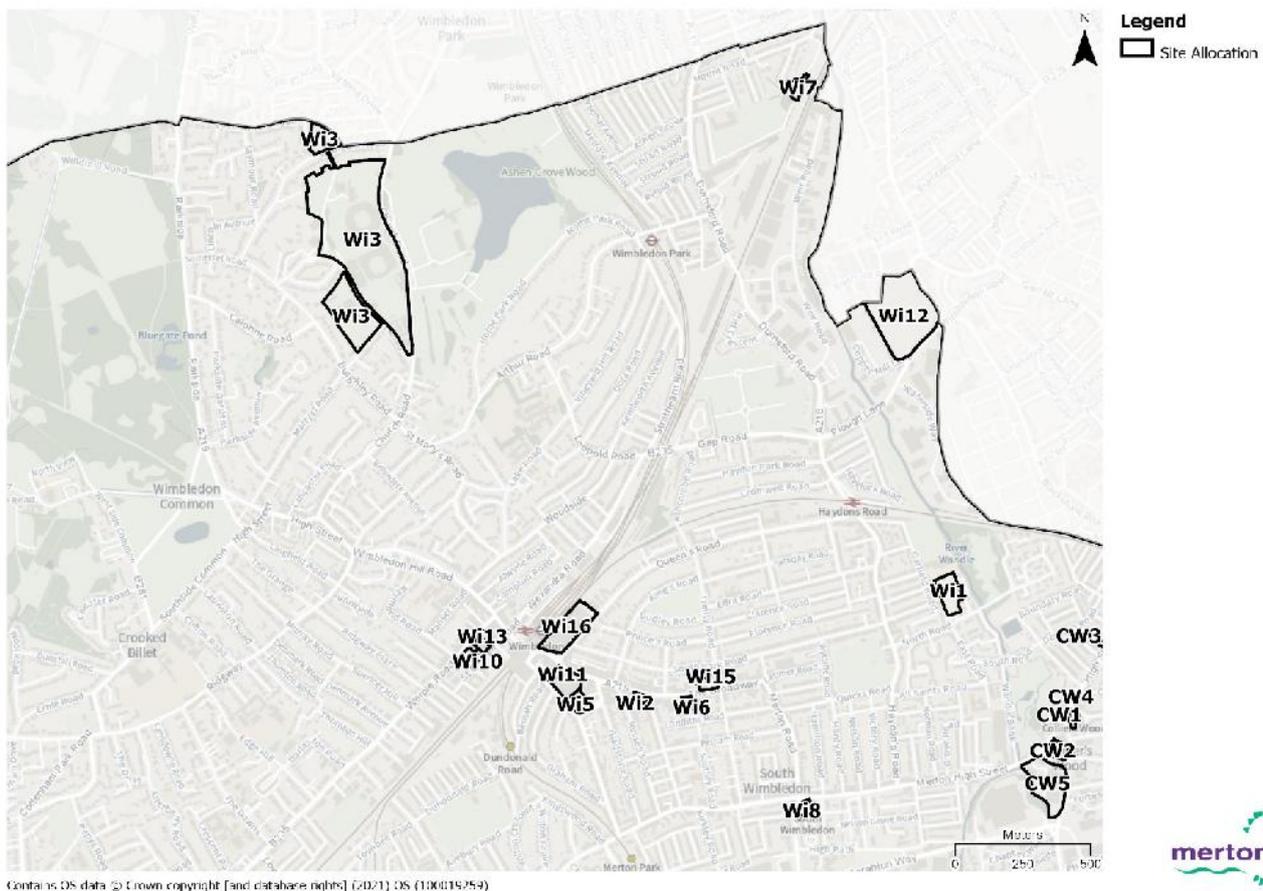
to Wimbledon, Merton and the UK (United Kingdom). The AELTC activities not only provide a significant economic benefit and jobs boost to Merton, London and the UK in the weeks around the Wimbledon fortnight but has benefits throughout the year. The main site acts as a draw for the 100,000 visitors to the Wimbledon tennis museum, some of whom will spend in the nearby Wimbledon town centre, Wimbledon Village and in the businesses at Arthur Road. The Raynes Park site supports free tennis coaching for Merton and Wandsworth schoolchildren and community access for residents to pay and play outside the Championships.

- 3.6.35.** We will support the continued upgrade and improvement of all AELTC's facilities to maintain its global position as the premier Grand Slam as set out in more detail in site allocation Wi3.

SITE ALLOCATIONS

Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.

Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a Site Allocations will be determined against planning polices (including the London Plan).



Site Wi1: Battle Close, North Road, Wimbledon, SW19 1AQ



Ward: Trinity
Site description: The site is a large, regular shaped vacant site in a residential area, with Garfield primary school and its playground next to the north. The site is situated within a residential area, characterised by terraced housing, dating from between the early 20th century to the early 2000s. The former use of the site was a purpose-built gym (now demolished) and a large car park.
To the east, south and west are two-three storey homes. The river Wandle and Wandle Park lie beyond the eastern boundary. The only site entrance lies to the south of the site with a small, vegetated traffic island partly obscuring the site entrance from the road. Until 2017 Virgin Active were the site's leaseholders and ran the site as a private gym and fitness club. Virgin Active looked to return their leasehold to the Council as freeholder and closed the facility in December 2017. The site is approx. 10 minutes' walk (0.4) miles from Colliers Wood underground station.
Site owner: Merton Council
Site area: 0.97
Existing uses: Vacant
Site allocation: Any of the following uses or suitable mix of community (including education), sport/leisure facilities and residential.
Site deliverability: 0-5 years
Indicative site capacity (new homes): 50 – 75 new homes

Design and accessibility guidance:

The size of the site gives rise to a variety of opportunities for different layouts of new buildings.

The site provides an excellent opportunity for the planned redevelopment of a substantial brownfield site in a residential area.

Redevelopment should protect the amenity of the adjacent residential occupiers and the primary school.

The site is classified as at risk of medium contamination from its former use for laundries and dry cleaning, however the risk will be reduced as contamination issues will have been addressed for the development of the site as a leisure centre.

Investigate the potential impact of any development on archaeological heritage. Vehicle access onto the site is restricted by the traffic island and the residential location.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

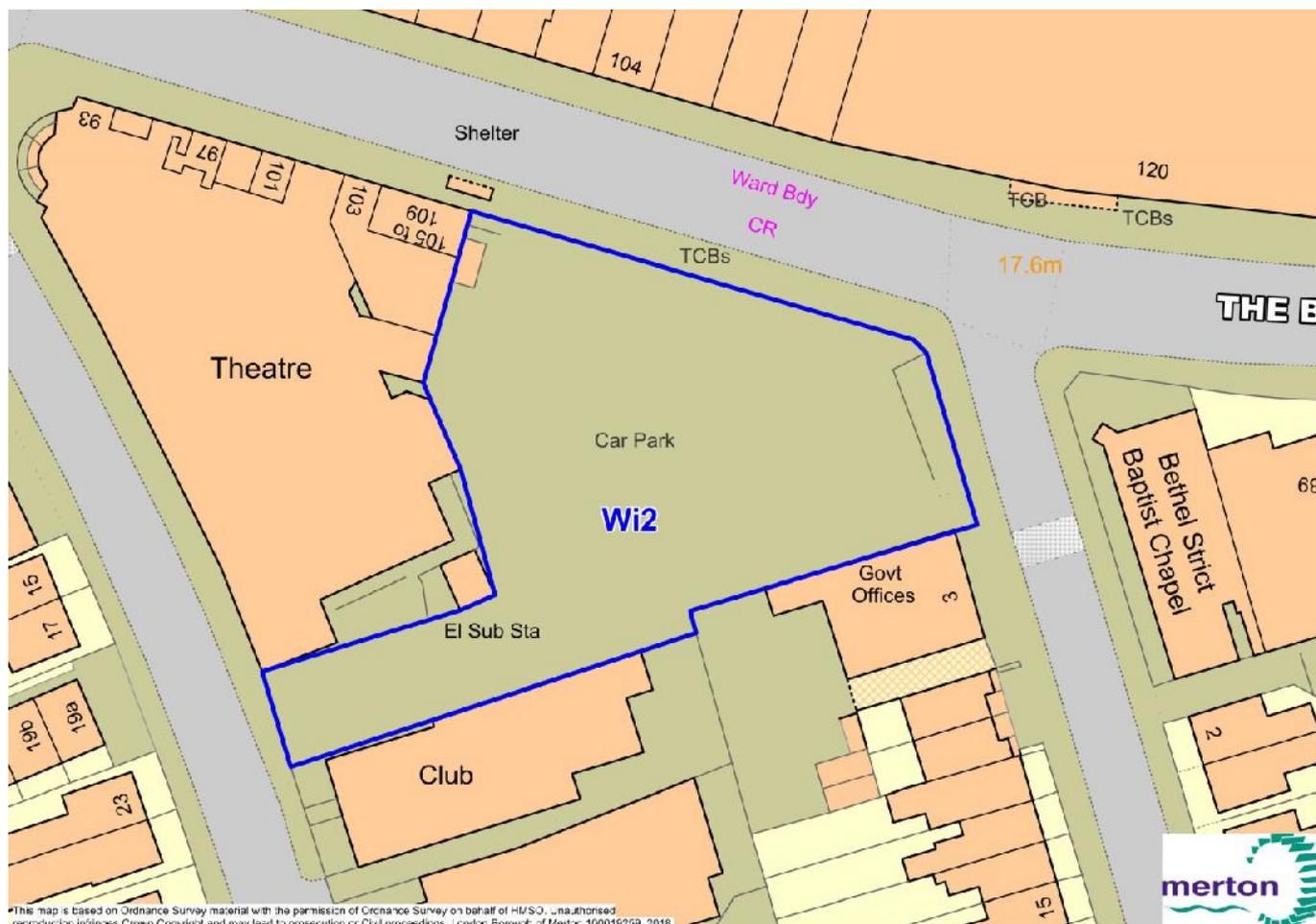
Despite a poor PTAL rating, the site is within easy walking distance of Haydon's Road and Colliers Wood stations and vehicle access is through residential streets from a single access point, so parking provision could be reduced below maximum standards. The site is also located in close proximity to key routes on the cycle network including the Wandle trail and Cycle Superhighway 7, so development proposals should maximise opportunities for cycling through the provision of exemplary cycle parking provision and any required contribution towards local network improvements.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer liaise with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Within the Wandle Valley/Colliers Wood Archaeological Priority Area Tier 2, and the 400m buffer of the Wandle Valley Regional Park boundary
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources.	Fluvial Flood zone 1. All sites require sustainable drainage measures.
Is in a town centre.	No
Is in an Opportunity Area.	No
Impacts a designated open space.	No. The homes at Autumn Close act as a barrier between the site and the nearby designated open space

Impacts an ecological designation.	Not on site. Within 100m of Metropolitan Open Land and a Site of Importance for Nature Conservation at Wandle Park.
Public Transport Accessibility Level (PTAL).	PTAL 2 (poor)

Site Wi2: Broadway Car Park, Land Adjoining New Wimbledon Theatre, 111-127 The Broadway, Wimbledon, SW19



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Ward: Abbey
Site description: This site is a surface car park found off The Broadway in Wimbledon town centre. Adjoining the site boundary to the west is the New Wimbledon Theatre (Grade II listed). The South Wimbledon Club and St Mary’s Primary RC School lie to the south of the site. Facing the site on the northern side of The Broadway is a shopping frontage with a series of small units. The site is surrounded by four storey buildings.
Site owner: Merton Council
Site area: 0.21ha
Existing uses: Car Park
Site allocation: a suitable mix of town centre type uses such as retail, café and restaurants, community, cultural, leisure and entertainment, offices and hotel.
Site deliverability: 0-5 years
Design and accessibility guidance: Development proposal must have regard to the Future Wimbledon SPD (Supplementary Planning Document) 2020.
The site boundary is adjoined to the west by the Grade II listed building, New Wimbledon Theatre. Development proposals will need to be sensitively designed to show how they conserve and enhance

the significance landmark of the New Wimbledon Theatre.

Development proposals must create an active frontage to enhance the town centre.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA (Opportunity Area) is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

The developer should contact SGN (Southern Gas Networks) and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

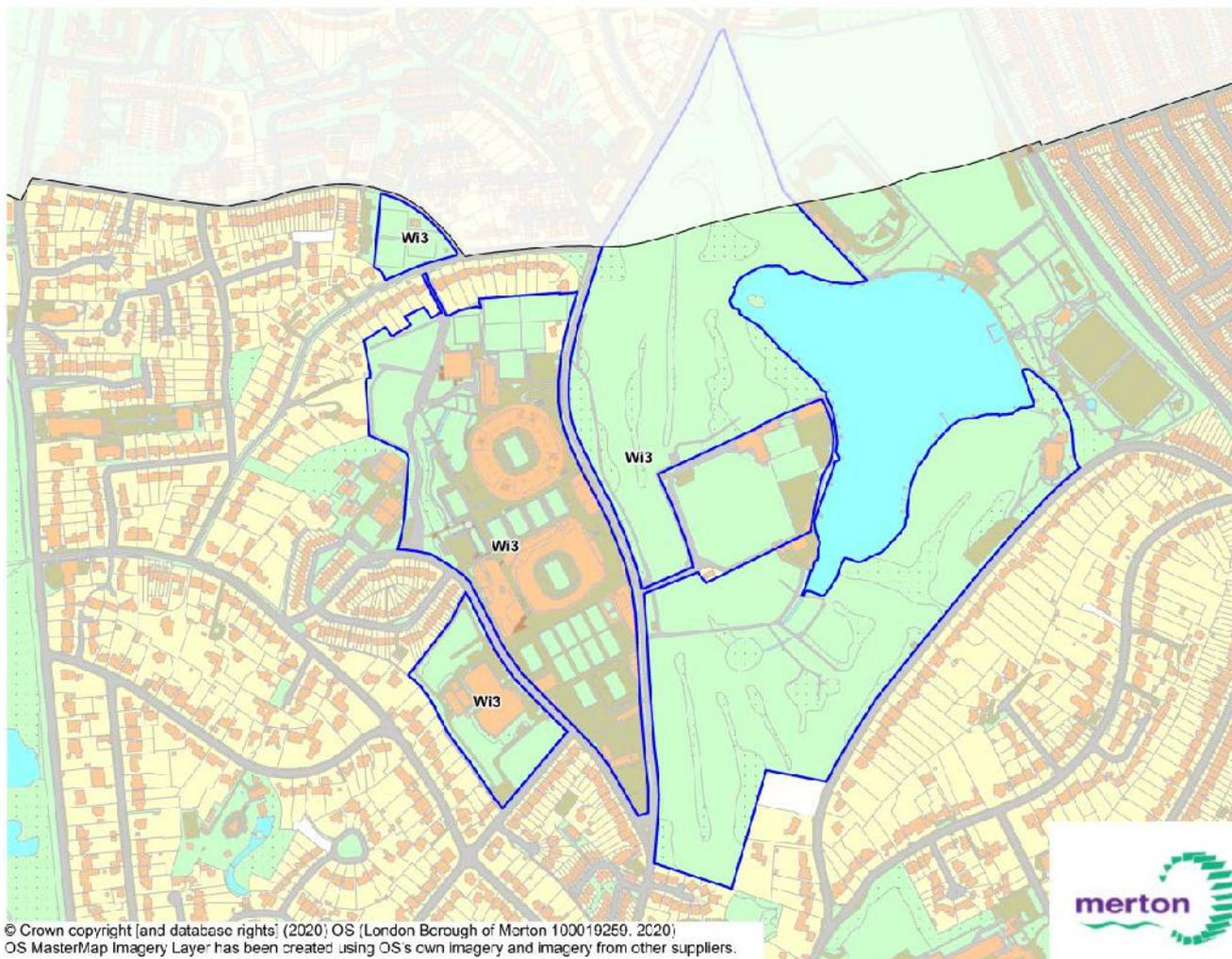
This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

A cycle hanger for use by local residents is located on the eastern boundary of the site. Development proposals should protect and enhance publicly available cycle parking provision.

The site location

Approach to taller buildings.	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD
Impacts on Listed Buildings or undesignated heritage assets.	Adjacent Grade II listed building New Wimbledon Theatre
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
In a Flood Zone.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

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



Ward	Wimbledon Park
Site description	<p>The All England Lawn Tennis and Croquet Club site, and specifically the Wimbledon Championships has long been internationally recognised as the premier tennis tournament in the world on grass. This long-established competitive tennis venue is the reason that “Wimbledon” is an internationally recognised and valued brand.</p> <p>The site is the All England Lawn Tennis Club (AELTC), an internationally recognised tennis venue with 18 outdoor and indoor tennis courts and supporting hospitality, offices, catering, press, players, security etc in a series of buildings and structures across the site.</p> <p>The site is occupied all year around but is used intensively and in its entirety during the two weeks of the Wimbledon Championships when it employs more than 10,000 people on-site, is visited by more than 500,000 spectators and broadcast to more than a billion people in +200 countries. The combined annual economic activity associated with The Championships and the activities of the AELTC was estimated in 2015 to be £180m for London and £280m for the UK (based on figures provided by AELTC).</p>

	<p>The main site is approximately 14 ha, with a smaller site of approximately 3ha across Somerset Road housing covered courts to the west and 22 grass courts in a site to the north; all of which are part of the AELTC site.</p> <p>Wimbledon Park, including Wimbledon Park Lake, lies at the other side of Church Road to the east of the site. The remaining surrounding area are made up of detached, semi-detached and terraced homes, many set in large plots in tree-lined streets.</p> <p>AELTC now owns the former golf course in Wimbledon Park and proposes that this becomes part of the hosting estate for the Wimbledon Championships, enabling the entire site to support the qualifying rounds and the Championships themselves by 2030.</p> <p>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.</p> <p>The AELTC have commenced the preparation of an updated masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course.</p>
Site owner	All England Lawn Tennis and Croquet Club
Site area	17.83 hectares
Existing use	<p>Part of the AELTC estate used mainly between May to September and intensively during the two weeks of the internationally recognised Wimbledon Championships.</p> <p>Outside The Championships period the site remains in use for member, club and charitable activities and includes the AELTC’s Wimbledon Lawn Tennis Museum which attracts 100,000 visitors per year.</p> <p>Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities. This use will cease from January 2022.</p>
site allocation	World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake.
Site deliverability	5-10 years
Design and accessibility guidance:	<p>Development of the site provide an opportunity to master planning the golf course land to create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC’s facilities to continue the prominence of The Championships and the opportunity to host more of the pre-Championship activities within Merton. Other opportunities benefits are:</p> <ul style="list-style-type: none"> • Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London. • In combination with the AELTC Raynes Park site, to support the capacity of the Wimbledon Junior Tennis Initiative, in providing better facilities for the free tennis coaching programme for primary school aged children in Merton and Wandsworth schools.

	<ul style="list-style-type: none"> Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register by AELTC (former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park. <p>Development proposal must respect the site’s historic setting including the views to St Mary’s Church and the surrounding area and the views from the Grade II listed Wimbledon Park.</p> <p>Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage.</p>
<p>Infrastructure requirements.</p>	<p>Development proposals for this site must have regard to Merton’s Infrastructure Delivery Plan and Green Infrastructure Study 2020.</p> <p>Transport for London are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site. A travel plan will also be required to incorporate all the AELTC’s landholdings and the Championships, which should support how people access the site in a sustainable way.</p> <p>The developer should contact Thames Water and SGN (Southern Gas Networks) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.</p> <p>This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.</p> <p>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</p>

The site location

<p>Impacts Listed Buildings or undesignated heritage assets.</p>	<p>Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century Capability Brown designed landscape which is now a Grade II listed Historic Park and is on the “heritage at risk register”. Various listed buildings and structures are also visible from the site.</p>
<p>Impacts a Conservation Area.</p>	<p>Yes. The north end of the site sits within Bathgate Road conservation area. The whole of the site is within an archaeological priority zone. Wimbledon north conservation area lies to the west of the site.</p>
<p>Impacts an Archaeological Priority Area.</p>	<p>Yes</p>
<p>Impacts a Scheduled Ancient Monument.</p>	<p>No</p>
<p>In a Flood Zone.</p>	<p>No, however the AELTC owned land at the golf course borders Wimbledon Park Lake, a key part of the man-made</p>

	historic landscape features which is also a Category A reservoir (regulated by the Environment Agency). Merton Council are undertaking improvements to Lake and the raised dam to ensure compliance with the Reservoirs Act.
Is in a town centre.	no
Is in an Opportunity Area.	no
Impacts a designated open space.	Yes, Open Land and designated open space.
Impacts ecology designations.	Yes, the golf course and surrounding land and lake are designated as Sites of Importance for Nature Conservation and green corridors.
Public Transport Accessibility Level (PTAL).	PTAL 2 poor access to public transport

Site Wi5: Hartfield Road Car Park, 42-64 Hartfield Road, Wimbledon, SW19 3RG



<p>Ward: Dundonald</p> <p>Site description: This site forms a surface car park and is next to the Sir Cyril Black Way bus interchange. There is dual pedestrian access to the car park from The Broadway and Sir Cyril Black Way and vehicular access is obtained from Hartfield Road. To the north is Victoria Crescent (also proposed as a site allocation Wi11 in this draft Local Plan) containing purpose-built retail units fronting Wimbledon Broadway (including Morrison’s supermarket, Uniqlo). Nearby are a wide range of town centre type uses including shops, offices, café and restaurants, leisure, recreation and residential uses.</p> <p>The site is found within the Wimbledon town centre boundary and the surrounding buildings have a range of building heights, from tall commercial premises to the north to the two-storey residential houses in Ashbourne Terrace to the east. The site is close to although not wholly visible from, The Broadway and Wimbledon station (c100m). The south of the site faces residential properties at the other side of Hartfield Road.</p> <p>There are a range of building heights and differing built character next to the site and the adjacent site is allocated for redevelopment as Site Wi11 in this Local Plan.</p>
<p>Site owner: Merton Council</p>
<p>Site area: 0.45ha</p>
<p>Existing uses: Surface car park</p>
<p>Site allocation: A mix of uses appropriate to a town centre including retail, offices, assembly and</p>

leisure and hotel. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.

Site deliverability: 5-10 years

Design and accessibility guidance:

Development proposals need to have regard to the Future Wimbledon SPD (Supplementary Planning Document) 2020.

The site to the north (Victoria Crescent) is also proposed for allocation by its freeholder in this Local Plan as site Wi11). A comprehensive redevelopment of this site and site Wi11 together could optimise development on both sites and provide much-needed public space in the heart of Wimbledon town centre.

The pedestrian route from the car park and The Broadway is found within the Wimbledon Broadway conservation area.

Hartfield Road and Sir Cyril Black Way suffer from congestion at peak times. A small part of the southern corner of the site is within a critical drainage.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

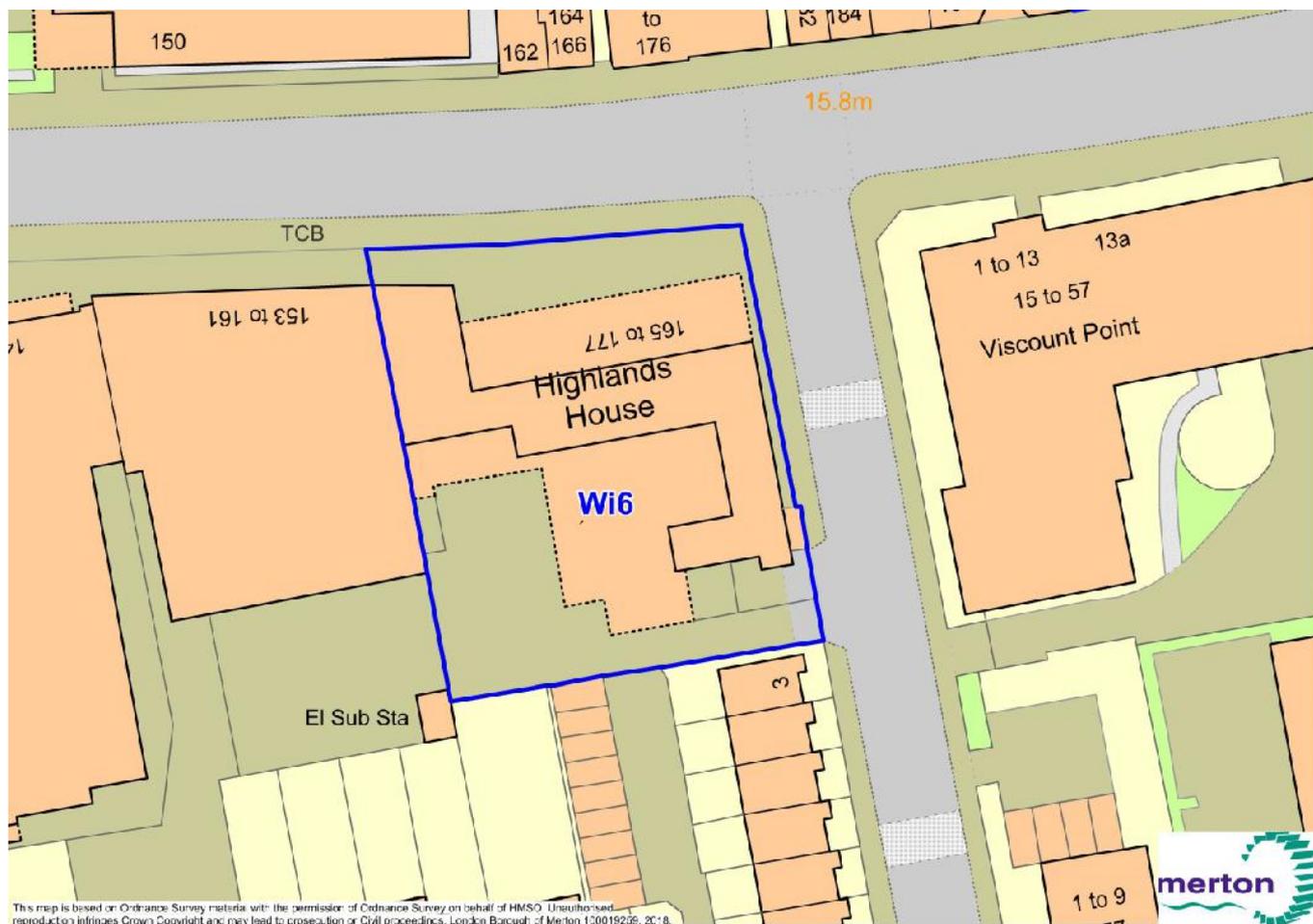
A connection for pedestrians and cyclists between The Broadway and Hartfield Road should be maintained through the site.

TfL (Transport for London) requests that redevelopment of this site does not prejudice access to or the operational efficiency of the adjoining bus interchange. The Council recommends the developer engages with TfL Buses prior to the submission of a planning application. The Council will need evidence of engagement with TfL as part of any submitted planning application.

Thames Water have indicated that the scale of development for this site is likely to require upgrades of the water supply network infrastructure, but they do not have concerns about the wastewater network or wastewater treatment infrastructure capability. It is recommended that the developer engages with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon Supplementary Planning Document (SPD).
Impacts Listed Buildings or undesignated heritage assets.	New Wimbledon Theatre on Wimbledon Broadway is a Grade II listed building,
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
In a Flood Zone.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi6; Highlands House, 165-171 The Broadway, Wimbledon, SW19 1NE



Ward: Abbey
Site description: The site is occupied by a mix of retail and offices within a 1960's style building that has a maximum height of seven storeys. The upper floors of the building are currently set back from the street line in a podium-block format. The site is a corner site between The Broadway and Southey Road. To the south of the site are residential terraces. On the opposite side of The Broadway are similar mixed-use developments with a range of building heights from three to six storeys. The site is found within Wimbledon town centre and is next to mixed use developments of retail, offices and residential uses.
This is a significant corner site with an active frontage facing onto The Broadway.
Site owner: ORION and BFL Management Ltd.
Site area: 0.16ha.
Existing uses: Retail, commercial and flexi office use
Site allocation: A suitable mix of retail, financial and professional services restaurants cafes, drinking establishments, offices, community (including health/day centre), sporting/leisure use, residential and hotel.
Site deliverability: Private ownership. 10-15 years
Design and accessibility guidance:

Development proposals must have regard to the Future Wimbledon Supplementary Planning Document (SPD).

Development of this site must be of exemplary design providing a high-quality office space on upper floors. In a mixed-use development residential uses should be on the upper floors. The ground floor should have an active frontage, respecting the dual aspect and the corner site.

Development of the site provides an opportunity to make better use of this site in a well-connected town centre location, including upgrading the commercial space and public realm/frontage to The Broadway and Southey Road.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.

Servicing facilities should be provided on site to minimise impacts on traffic movement, congestion and road safety. Mitigate and manage impacts of parking on neighbourhood and local amenity.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

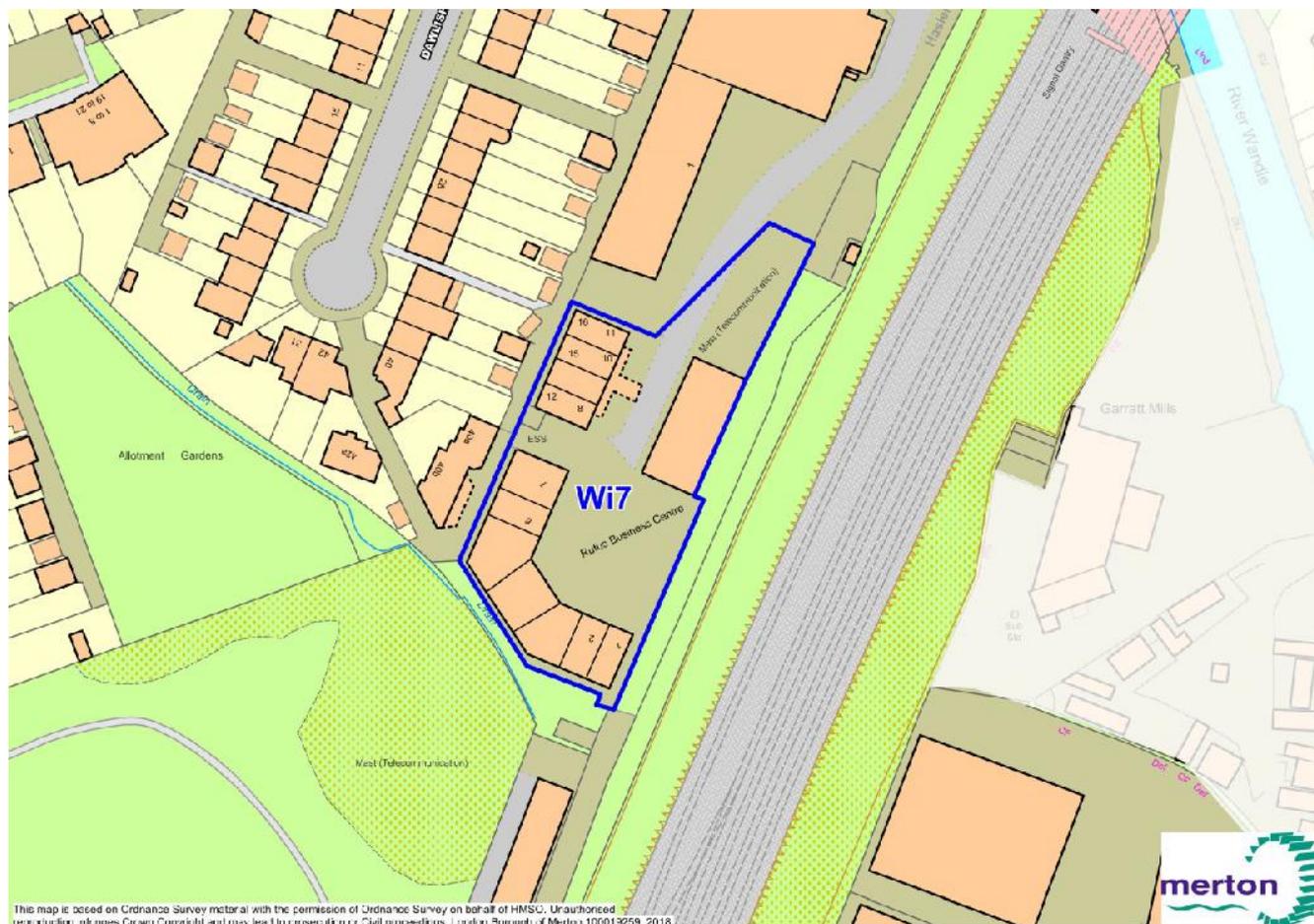
The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek advice from Thames Water about the development of this site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon Supplementary Planning Document (SPD).
Impacts Listed Buildings or undesignated heritage assets.	Grade II listed Wimbledon Theatre is visible further up The Broadway.
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No.
Impacts a Scheduled Ancient Monument.	No.
Impacts on flooding from all sources.	Area susceptible to surface water flooding
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes

Impacts a designated open space.	No.
Impacts on an ecology designation.	No.
Public Transport Accessibility Level (PTAL).	PTAL 6, excellent public transport access.

Site Wi7: Rufus Business Centre, Ravensbury Terrace, Wimbledon Park, SW18 4RL



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Ward: Wimbledon Park

Site description:

The Rufus business estate is a small site with residential neighbours in close proximity and a shared single access point for vehicles and pedestrians via Ravensbury Terrace through a site known as Haslemere Industrial Estate, which has been redeveloped for 139 homes, 1,100sqm of office floorspace and associated servicing, laid out on either side of the site (permission reference 16/P2672).

The site is situated near the northern boundary of Merton and is close to Wandsworth boundary. The site is adjacent to the railway lines to the east and residential to the west. The west of the site is bounded mostly by the gardens of short residential terraces on Dawlish Avenue with one existing residential property abutting the site. To the south is a strip of private land and then Dumsford Road Recreation Grounds although access to these recreation grounds is via Ravensbury Terrace to the north.

The site is occupied by several businesses and has capacity for c17 workshop and light industrial businesses.

There is a single access from Ravensbury Terrace which runs through Haslemere industrial estate.

The site has moderate access to public transport and lies within 10 minutes' walk of Earlsfield train station. However, pedestrian and vehicle access to the site is down a single passageway off Ravensbury Terrace, shared with the development at 12a Ravensbury Terrace and through Haslemere industrial estate.

Site owner: Astranta General Partner Ltd
Site area: 0.2ha
Existing uses: Commercial uses, predominantly storage
Site allocation: allocated as a mixed-use development consisting of both employment (business/light industrial and residential uses.
Deliverability: 0-5 years
Indicative site capacity (new homes): 90-106 new homes
<p>Design and accessibility guidance:</p> <p>Development of the site must be co-ordinated with the adjacent planning permission on the Haslemere estate (reference 16/P2672); construction of Haslemere will be complete prior to planning permission on this site W17.</p> <p>Development proposals will need to have regard to the Crossrail2 safeguarding on the eastern side of the site.</p> <p>Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain to minimise flood risk for future occupiers and the potential for water pollution from this site. This includes incorporating the recommendations for this site in Merton's Strategic Flood Risk Assessment Level 2.</p> <p>To ensure safe and secure access for pedestrians, vehicles and emergency vehicles in perpetuity, access must be co-ordinated in perpetuity with the adjoining site at Haslemere estate (ref 16/P2672).</p> <p>Due to the heavily restricted access particularly for emergency vehicles, development proposals involving residential will need to be brought forward and closely co-ordinated with the redevelopment of Haslemere estate. This would also address access and egress issues associated with the functional floodplain covering much of the site.</p> <p>Mitigating potential access, parking, traffic and safety impacts on neighbouring streets and local amenity, particularly the adjacent residential development.</p> <p>The site's restricted access and location beside railway lines and within a residential area will require a detailed Construction and Environmental Management Plan and construction methods that minimise noise, disturbance and traffic movements to be used.</p> <p>The site may be contaminated due to its previous industrial uses; however, risk will have been reduced as the site has already been redeveloped for business space.</p> <p>Infrastructure Requirements:</p> <p>Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.</p> <p>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</p> <p>The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.</p> <p>The site is adjacent to rail tracks used by the District line and land safeguarded for Crossrail2. Transport for London requires that London Underground Infrastructure Protection, Network Rail and the Crossrail2 team should be fully consulted about any works or development proposals that may impact on rail infrastructure. The Council will need evidence that the developer has engaged with London Underground</p>

and Network Rail as part of a planning application.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	A small part of the site to the north site in an Archaeological Priority Area
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Yes, flood zone 2 and 3.
Is in a town centre.	No
Impacts a designated open space.	No, however the site is within 400m of the Wandle Valley Regional Park
Impacts on an ecology designation.	Yes. The eastern boundary of the site (against the railway sidings) is designated as a Site of Importance for Nature Conservation and green corridors.
Public Transport Accessibility Level (PTAL).	PTAL Level 4. Moderate access to public transport

Site Wi8: South Wimbledon Station, Morden Road, South Wimbledon, SW19 3DB



Ward: Abbey

Site description:

The site is an important, highly visible landmark within the proposed new South Wimbledon Local Centre. The site is a part single storey / part two storey Northern line underground station, with pedestrian access from the corner of South Wimbledon junction. The façade of the building is clad in Portland stone and the building is of the distinctive Charles Holden design. The building is two storeys to the rear and built with London brick. The site has Transport for London operational offices and shop units, found on the corner two strategic roads Morden Road and Merton High Street.

To the south of the main building within part of the curtilage of the site there is a small car park and shed, that is currently occupied by a car hire firm. The Kilkenny Tavern lies to the east of the site, fronting Merton High Street Beyond this the sites are surrounded to the south and east by the High Path Estate which is part of a regeneration programme being led by the freeholder Clarion Housing Group.

The site is surrounded by proposals for the regeneration of High Path estate, guided by the Estates Local Plan and with an Outline Planning Application 17/P1721 resolved for approval in March 2018. (The site lies outside but next to both the Local Plan and the Outline Planning Application).

Site owner: Transport for London

Site area: 0.21ha

Existing uses: Underground Station and commercial premises (coffee shop and local convenience store)

Site allocation: Retaining the underground station and residential or residential mixed-use retail, financial services and professional, cafes and restaurants, public house and offices.

Site deliverability: 10-15 years

Indicative site capacity (new homes): Not confirmed

Design and accessibility guidance:

Development of the site provides several opportunities to delivery of new homes in an accessible sustainable location, providing new services and homes at a landmark location in the new South Wimbledon local centre.

Development proposal must respect and enhance the Grade II listed heritage asset of South Wimbledon Station and other local heritage assets within the area. There is an opportunity to compliment the Charles Holden designed listed London Underground station.

Development proposal should explore the opportunity to create a secondary entrance to the Underground station and a small public space to the rear of the site, both situated away from the busy South Wimbledon junction. This would help improve the resilience of the station, provide greater permeability and movement options for people travelling to and from the station and create a small space to pause away from the busy junction. Opportunity to engage with and neighbouring landowners, (Clarion Housing Group) to coordinate on design, streetscape and optimise both sites for the delivery of new homes.

Development proposal must incorporate recommendation within Merton’s Strategic Flood Risk Assessment to address the issues associated with the location within a flood zone.

An investigation of the potential impact of any development on archaeological heritage is needed.

The site is within 50m of London Underground subsurface tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our Opportunity Area, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the Opportunity Area is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site playspace provision in accordance with the infrastructure policies and London Plan.

Development proposals should provide high quality secure cycle storage for commuters in addition to and separate from residential cycle parking provision.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek advice from Thames Water about the development of this site.

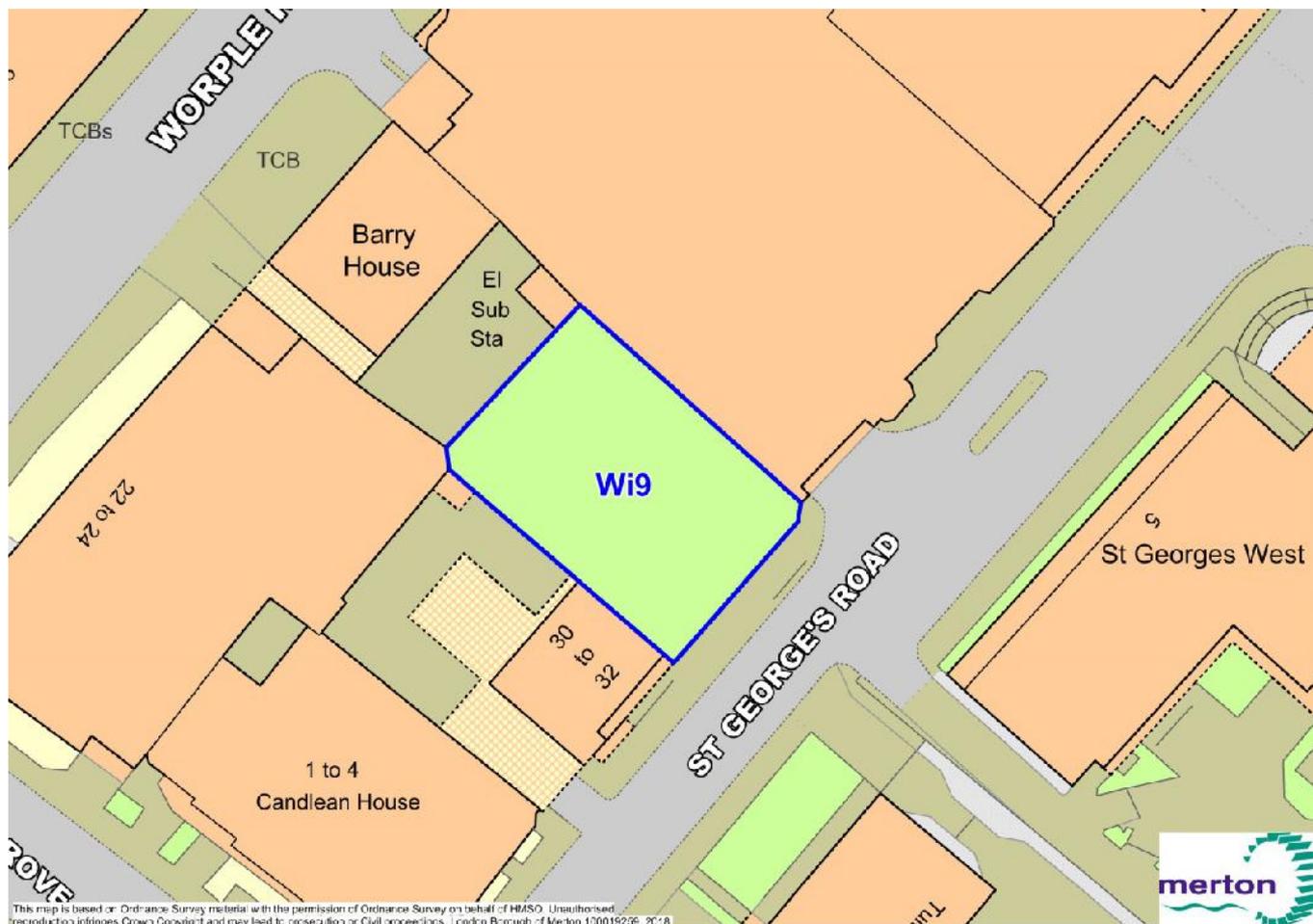
The site location

Impacts Listed Buildings or undesignated heritage assets.

South Wimbledon station building is Grade II listed, one of several Charles Holden designed purpose-built London Underground station buildings.

Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Site partially in Flood Zone 2 and in a critical drainage area
Is in a town centre.	No
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6, excellent access to public transport

Site Wi9: 28 St George’s Road, Wimbledon, SW19 4DP



Ward: Hillside
Site description: This site is currently vacant. It held the former Wimbledon community centre, which was vacated during 2012 and demolished in summer 2013. It is surrounded to the east by four to five storey mixed use buildings (commercial/offices), to the west by four storey offices and to the south by office buildings ranging from five to nine storey in height.
Site owner: Merton Council
Site area: 0.06ha
Existing uses: This site has been vacant since 2013. It is surrounded to the east by four to five storey mixed use buildings (commercial/offices), to the west by four storey offices and to the south by office buildings ranging from five to nine storey in height.
Site allocation: a suitable mix of town centre type uses such as community use, retail, financial and professional services, offices, hotel and residential.
Indicative site capacity (new homes):
Site deliverability: 0-5 years
Design and accessibility guidance:
Development of the site provide an opportunity for a co-ordinated approach to design and delivery from four sites proposed in this plan: Wi9, Wi10, Wi13 and Wi14
Development proposals must have regard to the Future Wimbledon Supplementary Planning Document (SPD).

Development of the site provides an opportunity to provide modern floorspace for businesses, complementing the surrounding area and provide an active street frontage to contribute towards the vibrancy and vitality of Wimbledon town centre.

Development proposals must protect the amenity of occupiers next to the site.

Development proposals will need to provide an active street frontage to contribute towards the vibrancy and vitality of the town centre.

In a mixed-use development, residential uses should be on upper floors.

The development proposal must manage and mitigate the parking and servicing impacts on traffic movement, congestion and road safety.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Development proposals must address issues associated with localised surface water flooding and the critical drainage area.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

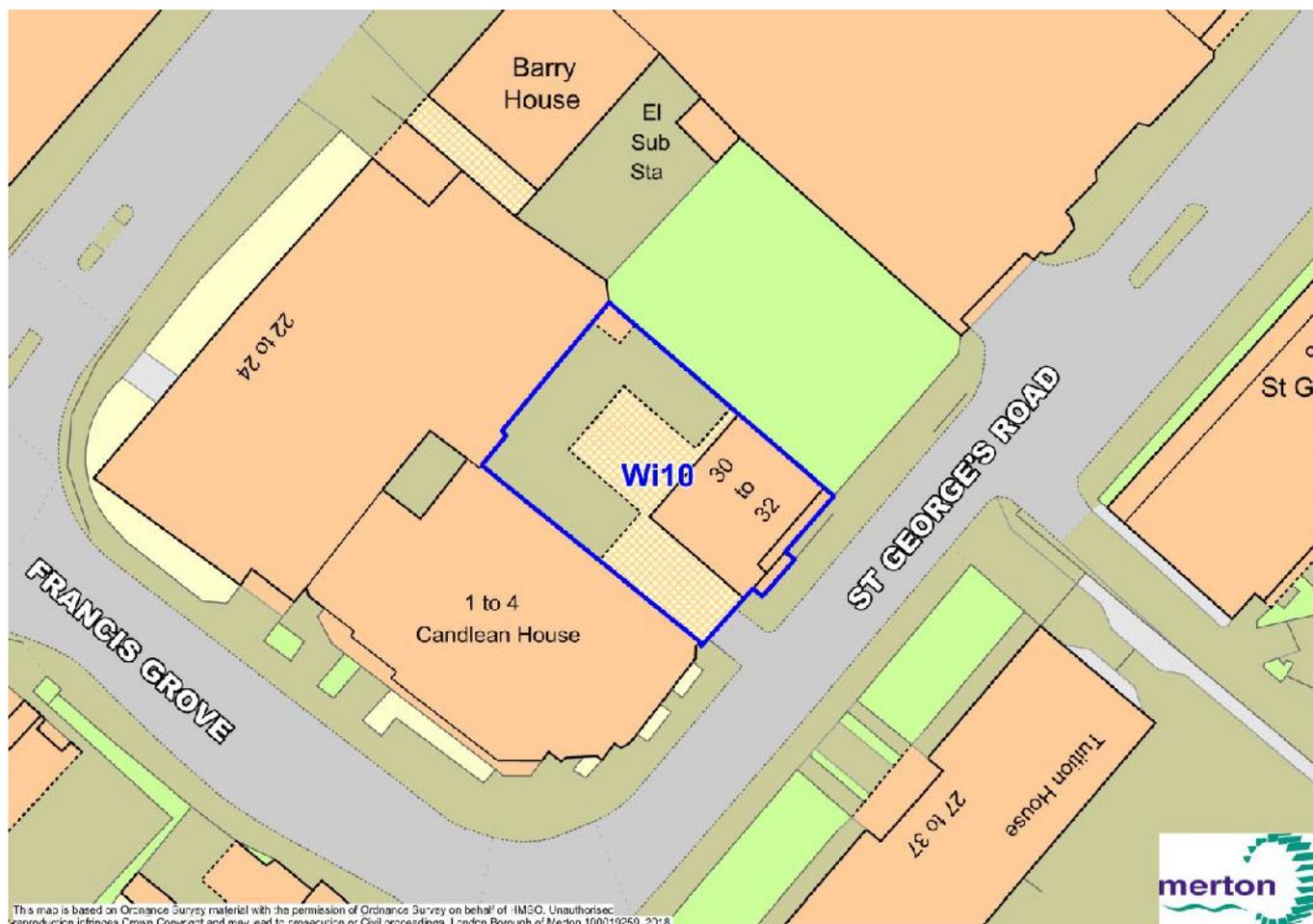
Proposals should improve the public realm and pedestrian and cycling facilities around the site.

The developer should contact Thames Water and SGN to discuss requirements for any improvements to the water, wastewater and gas infrastructure network arising from their proposals.

The site location

Approach to tall buildings	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD (Supplementary Planning Document)
Impacts Listed Buildings or undesignated heritage assets.	Yes.
Impacts a Conservation Area.	Yes
Impacts an Archaeological Priority Area.	Yes.
Impacts a Scheduled Ancient Monument.	No.
Impact on flooding from all sources.	Yes, site is within a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6b, excellent access to public transport.

Site Wi10: Prospect House, 30 St George’s Road, Wimbledon, SW19 4BD



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Ward: Hillside
Site description: The 4-story office building is part of a large block of commercial development between Worple Road and St George’s Road, with varying building heights, uses, designs and land ownership. It is surrounded to the west and north by other 4 storey office blocks and to the south by offices ranging from five to nine storeys in height. To the north east of the site lies the vacant site at 28 St George’s Road, also proposed for redevelopment in this plan. The site lies in a commercial area of Wimbledon town centre. Opposite is Tuition House, a substantial office block housing many businesses. The adjacent site 1-4 Francis Grove has a planning proposal for office redevelopment (planning reference 19/P3814).
Site owner: Henderson UK (United Kingdom) Property PAIF and T H Real Estate
Site area: 0.05ha
Existing uses: Offices
Site allocation: Offices or hotel.
Site deliverability: 0-5 years
Design and accessibility guidance: Opportunity for a co-ordinated approach to design and development delivery with the following site allocations - Wi9, Wi10, Wi13 and Wi14 as set out in the London Plan.

Development proposals must have regard to the design led Future Wimbledon Supplementary Planning Document (SPD).

Development proposals will need to provide an active street frontage along St George’s Road to contribute towards the vibrancy and vitality of the town centre.

Provide well-designed modern commercial floorspace to support businesses and create jobs in Wimbledon.

Development proposals must address issues associated with localised surface water flooding and the critical drainage area.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

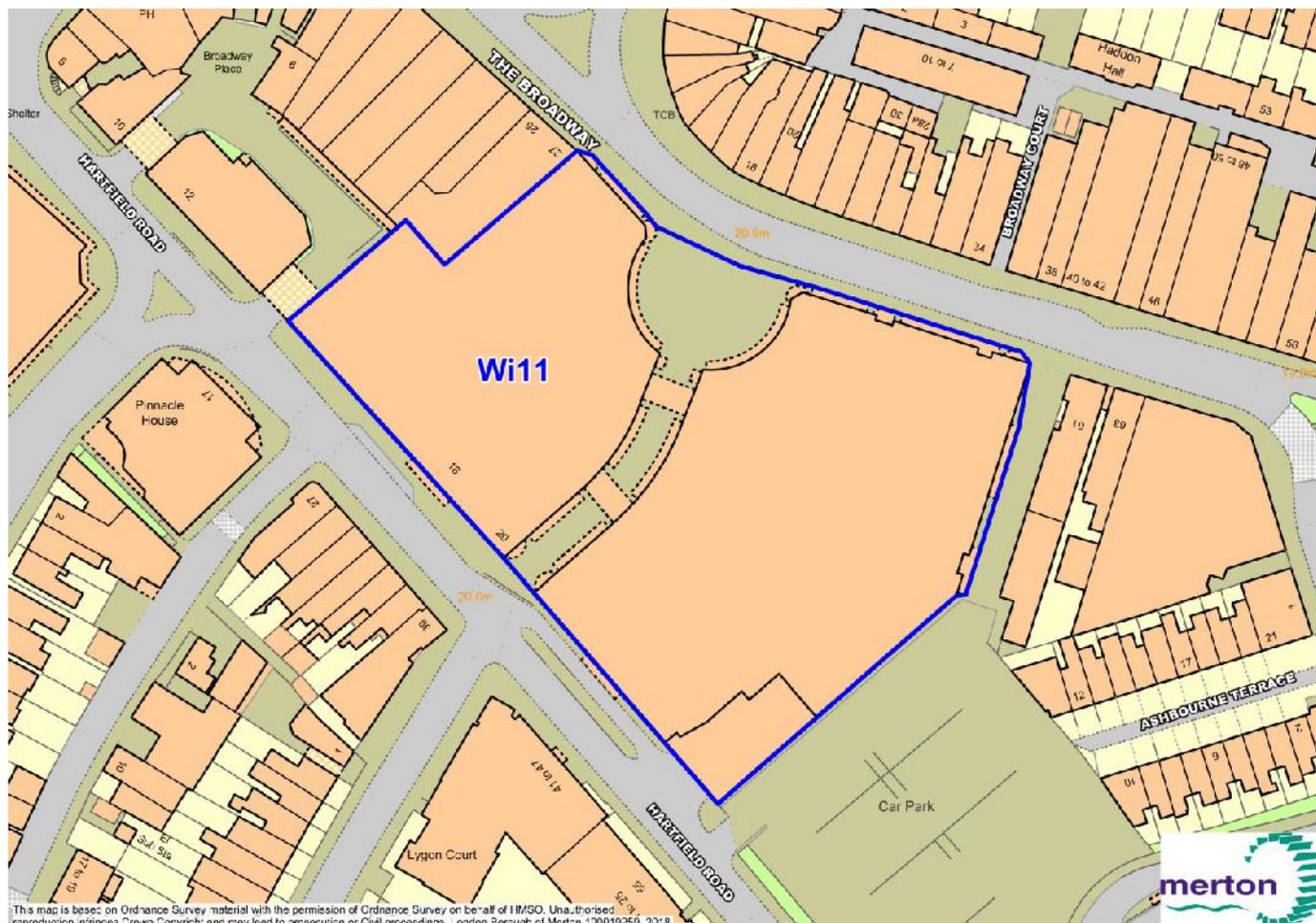
This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact Thames Water and SGN to discuss requirements for any improvements to the water, wastewater and gas infrastructure network arising from their proposals.

Proposals should improve the public realm and pedestrian and cycling facilities around the site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Within the Wimbledon Village Archaeological Priority Zone
Impacts a Scheduled Ancient Monument.	No
Impact on flooding from all sources.	Site within a critical drainage area.
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi11: Victoria Crescent, 39-59 The Broadway, 1-11 Victoria Crescent, Wimbledon, SW19 3RG



Ward: Dundonald

Site description: The site sits in the heart of Wimbledon town centre with core shopping frontage facing The Broadway and Wimbledon station. It is prominent within the town centre and is highly visible from the eastern exit of Wimbledon station.

Together with Wimbledon Bridge House, it is one of the few purpose-built premises having street frontage space of a standard size for larger retailers. It holds a significant amount of retail and leisure floorspace. The Piazza is one of the few public spaces in Wimbledon town centre and is periodically used by food markets and for events such as Love Wimbledon summer tennis screenings and Winter Wonderland.

To the north of the site on the other side of The Broadway lies South Park Gardens Conservation Area with multiple small shopping frontages occupied by a range of shops and services.

The site is divided into two main buildings, laid out in a crescent shape with a piazza fronting The Broadway and residential walkway running from The Broadway through to Hartfield Road. Both parts of the site consist of commercial units on the ground and upper floors. The south-eastern side of the crescent is occupied by Morrison's supermarket on the ground floor and purpose-built large shopfronts leading west, occupied by brand retailers and ancillary offices and storage above. Hartfield Road and Sir Cyril Black Way (the back of the site) suffers from congestion at peak times.

This unit backs onto a Council owned car park off Hartfield Road, known as P3, which is also proposed for redevelopment. The western side of the crescent is occupied by Odeon cinema on the upper floors with a variety of shopfronts on the ground floor, occupied by food and drink uses.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Site owner: Owned by F&C Commercial Property Holdings Ltd and asset managed on their behalf by BMO Real Estate Partners

Site area: 1 hectare (approx.)

Existing uses: Mixed use retail and leisure.

Site allocation: A mix of uses including retail, pub or drinking establishment, financial and professional services, assembly and leisure, hotel with the re-provision of public realm. The priority for the site should be town centre uses. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.

Site deliverability: .5-10 years

Design and accessibility guidance:

The development is subject to occupational leases and as these come up for renewal, the landowners have identified the opportunity for phased mixed-use redevelopment of the site.

Development proposals must have regard to the design led Future Wimbledon Supplementary Planning Document (SPD).

Development of the site provide an opportunity to deliver a comprehensive redevelopment together with the council-owned adjacent Hartfield Road car park to optimise the site layout, access, design and use.

Development proposals must recognise the sites proximity to nearby site allocations (Hartfield Road and Victoria Crescent) and provide new purpose-built town centre uses to support businesses, jobs and cultural activities, and re-providing much needed public space.

Development proposals must recognise the site's proximity to and must consider the setting of nearby heritage assets.

Development proposals must provide enhanced accessibility to bus stops and links to cycle routes.

Any servicing facilities must be provided on site to minimise impacts on traffic movement, congestion and safety.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The new layout of the site must facilitate pedestrian access from The Broadway to Hartfield Road including to consider accommodating cyclists and to link better to the surrounding cycle and pedestrian networks particularly by supporting a north-south link through the town centre.

Provide enhanced public cycle parking facilities and make provision to accommodate cycle/ scooter hire schemes.

There is an opportunity to provide enhanced public cycle parking facilities, including a secure hub for commuters and make provision to accommodate cycle/ scooter hire schemes.

This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years and 5-11 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	The frontage of the site is within the setting of listed former town hall and Grade II listed Wimbledon Theatre.
Impacts a Conservation Area.	Yes
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	No
Impacts from flooding from all sources.	Yes, site is within a critical drainage area.
Is in a town centre.	Yes, Wimbledon town centre.
Is in an Opportunity Area.	Yes, designated in the London Plan.
Impacts a designated open space.	No
Impacts on an ecology designation.	No.
Public Transport Accessibility Level (PTAL).	PTAL 6b, excellent access to public transport.

Site Wi12: Wimbledon Stadium and Volante Site - Plough Lane and Summerstown Road, Wimbledon Park, SW17 OBH



Ward: Wimbledon Park

Site description: The site is surrounded by strategic industrial locations (all sides). The proximity of the waste management site to the north west.

To the north and east of the site is Summerstown Road strategic industrial location (London Borough of Wandsworth), which includes a waste management site to the northwest. To the south and west is part of Durnsford Road/Plough Lane strategic industrial location (London Borough of Merton).

Most of the site (stadium, squash and fitness, shop and homes) is due to complete construction in late 2021 (main planning permission references 14/P4381 and 18/P3354). Planning permission 15/P4798 applies to the portion of the site formerly known as the Volante land fronting Summerstown Road.

The site and buildings on the eastern boundary are in separate ownership fronting Summerstown road in Wandsworth with planning permission including residential development. (Reference 15/P4798)

The site adjoins businesses along the northern and eastern boundary within the London Borough of Wandsworth. To the south of the site in Merton on the other side of Plough Lane is an industrial estate (Garrett Park) which is part of a Business Improvement District.

Running along the western boundary of the site is a large operational electricity substation owned by National Grid. National Grid has also advised that this is unlikely to extend into the boundary of this site.

Site owners: Privately owned – various landowners.

Site area: 5.29 hectares

Site allocation: Intensification of sporting activity with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation (same allocation as Merton's Sites and Policies Plan 2014 site 37. The Council proposes to continue with the site allocation to give certainty to the multiple landowners and surrounding business and residential occupiers that it continues to support the allocated use.

Most of the site (stadium, squash and fitness, shop and homes) is due to complete construction in late 2021 (main planning permission references 14/P4381 and 18/P3354). Planning permission 15/P4798 applies to the portion of the site formerly known as the Volante land fronting Summerstown Road.

Indicative site capacity (new homes): 700-750 new homes across all ownerships

Site deliverability: 0-5 years (the majority of the site – 634 homes - due to be completed by the end of 2021). Approximately two thirds of the site is due to complete construction in 2021 associated with the delivery of planning permission reference 14/P4381, 18/P3354 and associated applications for a variety of uses including a football stadium for AFC Wimbledon, +600 homes and other facilities.

Design and accessibility guidance:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Development of the site provides an opportunity to deliver sporting intensification with enabling development on a large brownfield site is being exercised by the landowners.

Development proposals should seek to improve the accessibility opportunities to improve bus infrastructure, walking and cycling facilities to and from the site and provide improved links to Wimbledon town centre.

Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain and with the critical drainage area to minimise flood risk for future occupiers and the potential for water pollution from the site. A flood risk assessment will be required as set out in the NPPF and should also consider the treatment of the non-main rivers that pass through the site and incorporate sustainable drainage systems into development proposals. The design and layout must incorporate the recommendation of Merton's Strategic Flood Risk Assessment

Development proposal should seek to resolve and improve the road network capacity, movement and local safety concerns.

Redevelopment proposals should take account of the electricity substation to the west of the site to minimise the effects on amenity of future occupiers.

Development proposals must investigate the potential impact of any proposed development on archaeological heritage.

Facilitating improved accessibility including improving bus infrastructure, walking and cycling facilities. Resolving road network capacity, movement and safety concerns. Site access arrangements require careful scrutiny/improvement.

A squash and fitness club existed on the site. Proposals should include the provision for an equivalent or enhanced squash and fitness club as part of sporting intensification.

Infrastructure requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

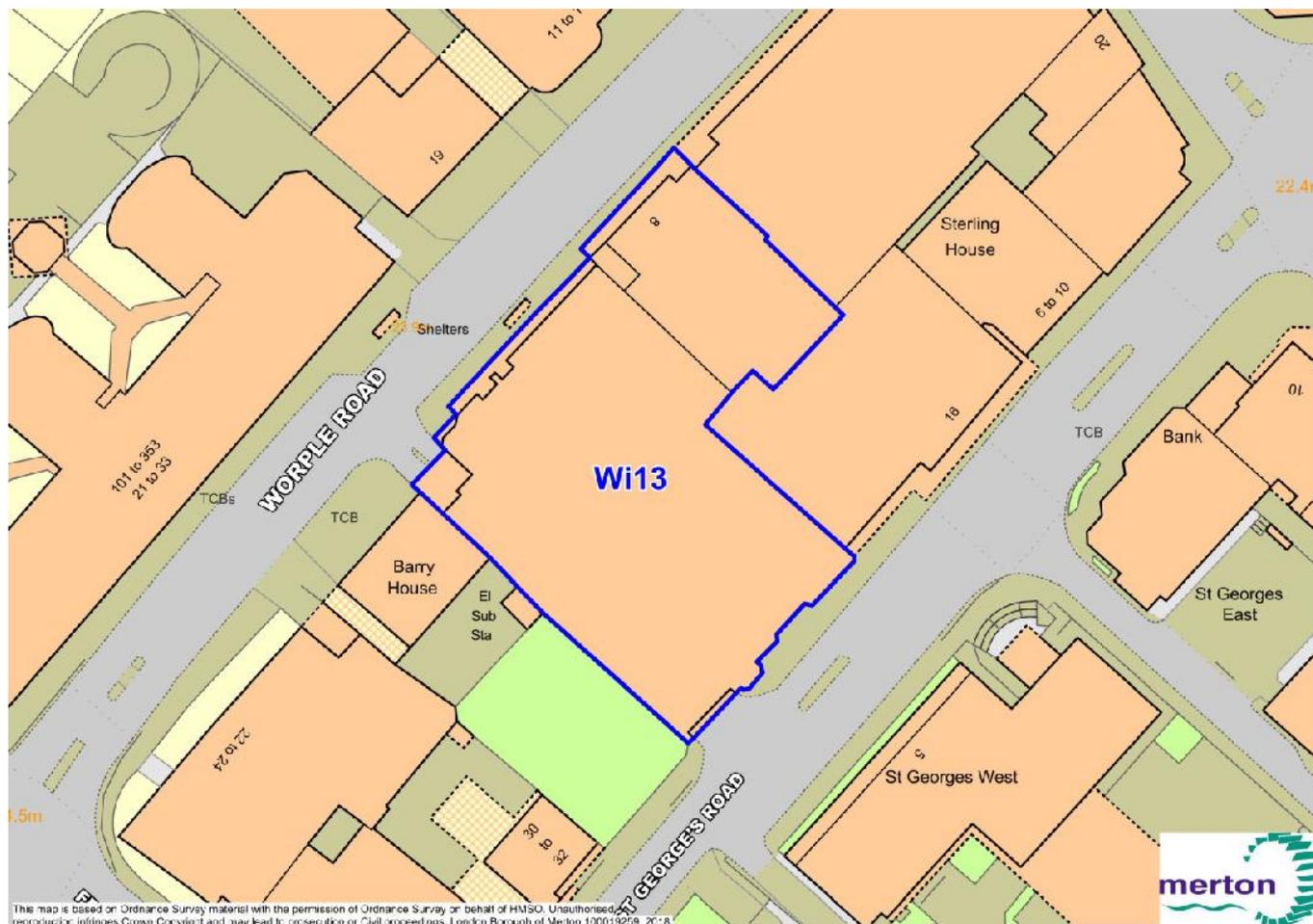
This site is in an area identified as being deficient in access to children's play space for ages 0-4 years, 5-11 years and 12+ years. The Council will require on site provision in accordance with the infrastructure policies and London Plan. The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. The Council will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Thames Water have indicated that the scale of development for this site that, upgrades of the water supply network infrastructure and wastewater network are likely. It is recommended that the developer with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council needs as part of any submitted planning application evidence of engagement with Thames Water with any submitted planning application. Merton Council will seek advice from Thames Water about the development of this site as part of the planning process.

The site location	
Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape.
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Yes, the entire site.
Impacts a Scheduled Ancient Monument.	No
Impacts from flooding from all sources.	Yes, the site and its surrounds are within the functional floodplain of the River Wandle (Flood Zone 3a). The majority of the site is within a critical drainage area for surface water flooding.
Is in a town centre.	No
Is in an Opportunity Area.	No
Impacts a designated open space.	Yes, within Wandle Valley Regional Park 400m buffer zone.
Impacts on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 2/3 poor/moderate accessibility to public transport (PTAL 2/3).

Site Wi13: 8-20 Worple Road and 20-26 St George’s Road Wimbledon SW19 4DD



Ward: Hillside
Site description: The site is a Sainsbury’s supermarket with car park. The site is part of a large block of commercial development sites between Worple Road and St George’s Road, with varying building heights, uses, designs and land ownership. The site has frontage onto both Worple Road and St George’s Road, Elys department store adjoins the north east boundary of the site, fronting Wimbledon Hill Road and Worple Road. Offices in Barry House connect the north east of the site fronting St George’s Road. Offices, a gym and shops lie opposite the site.
Site owner: Eskmuir Group
Site area: 0.22ha
Existing uses: Supermarket with ancillary car parking, and offices
Site allocation: A mix town centre types uses such as retail, financial and professional services, offices, hotel or Community (including health/day centre), residential on upper floors to enable commercial led development.
Site deliverability: 5-10 years
Indicative site capacity (new homes):
Design and accessibility guidance: Opportunity for a co-ordinated approach to design and delivery from four sites proposed in this plan: Wi9, Wi10, Wi13 and Wi14.
Development proposals must have regard to design led Future Wimbledon Supplementary Planning Document.

The site provides an opportunity to deliver a well-designed modern commercial floorspace to support businesses and create job opportunities within Wimbledon town centre.

Development proposals must provide an active street frontage along either Worple Road or St George's Road to contribute towards the vibrancy and vitality of the town centre.

Development proposals must address and manage parking, improve road safety, traffic movement, reduce or minimise congestion around the site and nearby roads.

Provide a new pedestrian route to improve permeability in this area that connect Worple Road and St George's Road, breaking up the existing large block.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure requirements:

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Proposals should improve the public realm and pedestrian and cycling facilities around the site.

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.

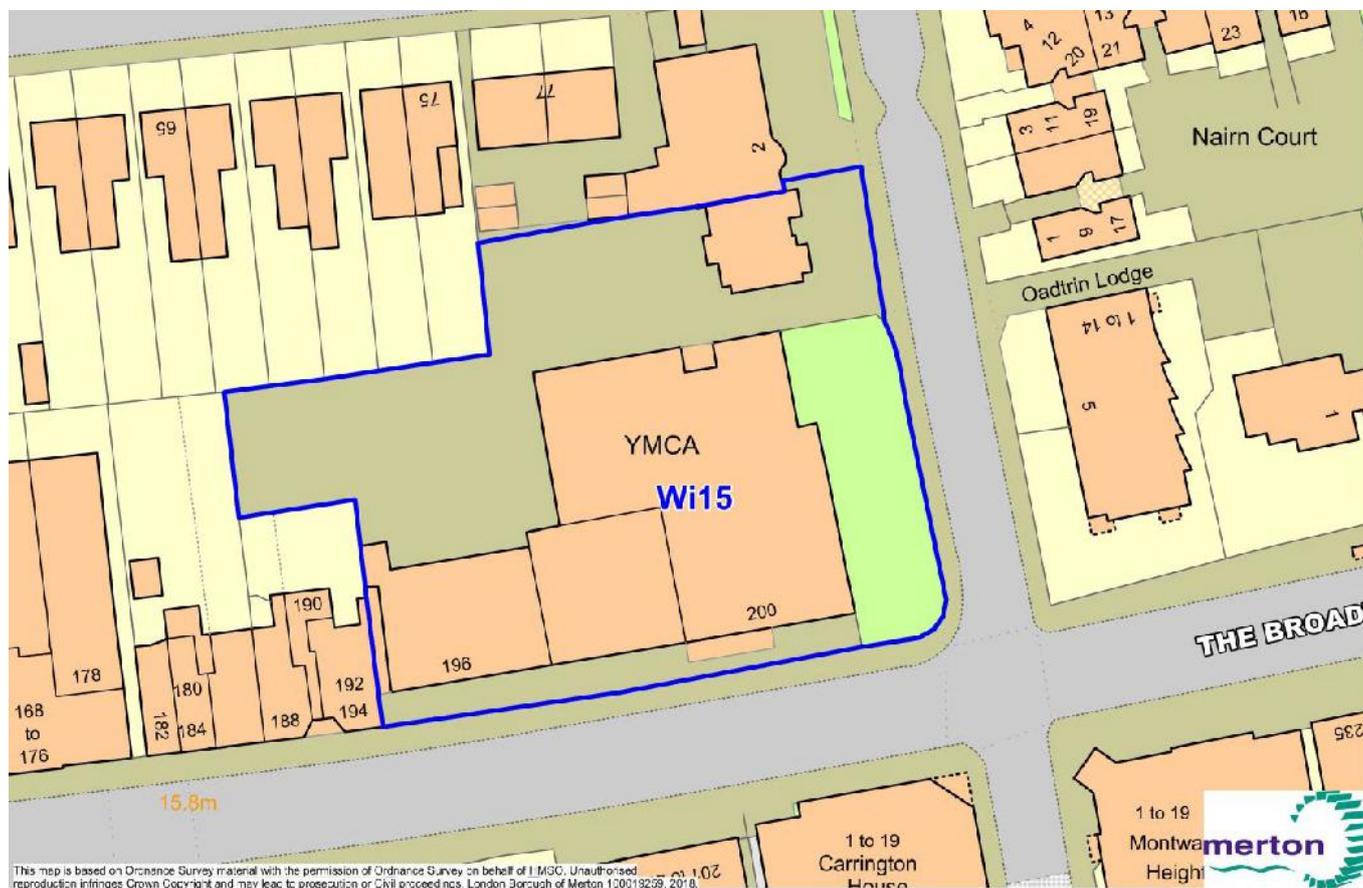
This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

The site location

Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	Within the Wimbledon Village Archaeological Priority Zone
Impacts a Scheduled Ancient Monument.	No
Impacts on flooding from all sources.	Yes, site is in a critical drainage area.

Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impacts an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport

Site Wi15: YMCA Wimbledon 196-200 The Broadway, Wimbledon, SW19 1RY



Ward: Trinity
Site description: The site is in use as a YMCA with a wide range of uses, including a youth advice centre with hostel space and a café. The buildings on site range up to eight storeys with seven storeys fronting The Broadway.
The site is a prominent corner site with an active frontage facing onto The Broadway and acts as the eastern gateway to Wimbledon town centre.
The site is found within Wimbledon town centre. To the east the site adjoins mixed use developments including retail, offices and residential uses. The southern side of The Broadway opposite the site has a range of building heights, up to six storeys. The site is bounded on the east by Trinity Road. To the north of the site is the former Conservative Club (recently sold) and residential properties 2-3 storey semi-detached homes.
A planning application (ref: 20/P1738) was granted permission for a 121-room hostel, 135 apartments, gym, café and other ancillary uses.
Site owner: YMCA London South West
Site area: 0.21ha
Existing uses: YMCA with hostel space, gym, sports hall and café.
Site allocation: A suitable mix of retail, financial and professional services, restaurants /cafes, drinking establishments, offices, community use and residential (including hostel or hotel).
Site deliverability: 0-5 years

Indicative site capacity: 135 new homes plus 121 bed hostel space (A planning application (ref: 20/P1738) was granted permission for a 121-room hostel, 135 apartments, gym, café and other ancillary uses.

Design and accessibility guidance:

Development proposals will need to consider the amenity of neighbouring residential uses to the north of the site.

Any servicing facilities should be provided on site to minimise impacts on traffic movement, congestion and road safety. Mitigating and managing the impacts of parking on neighbourhood and local amenity will need to be addressed.

Due to the site prominence (active frontage facing onto The Broadway and gateway to the town centre) redevelopment of must be of exemplary design.

The site provides an opportunity to provide modern, well-designed hostel type accommodation and support services for vulnerable people in an accessible location.

Public space would be welcomed as part of any development proposal.

Development proposal must have regard to the design-led Future Wimbledon SPD (Supplementary Planning Document).

Development proposals must ensure links and access to the nearby bus stops.

The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.

The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.

Thames Water does not envisage infrastructure concerns about the water supply network infrastructure, wastewater network or wastewater treatment infrastructure capability in relation to the development of the site. However, the Council strongly recommends that the developer engage with Thames Water at the earliest opportunity to advise the developments phasing. The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also, engage with and seek from Thames Water about the development of this site.

The site location

Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	No
Impacts a Conservation Area.	No
Impacts an Archaeological Priority Area.	No

Impacts a Scheduled Ancient Monument.	No
Impact from flooding from all sources.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	No
Impact on an ecology designation.	No
Public Transport Accessibility Level (PTAL).	PTAL 6a, excellent access to public transport.

Site Wi16: Centre Court Shopping Centre, The Broadway, Wimbledon SW19

Ward: Hillside

Site description: Centre Court is a purpose-built shopping centre in Wimbledon town centre. The shopping centre runs along a major transport infrastructure - Wimbledon Station (underground, tram and railway services). The railway lines and platforms run along the western side of the shopping centre.

The main site entrance is found to the south west of the site along The Broadway. Secondary accesses are found along Queen's Road. The site is surrounded by several building types ranging in height from two to four storeys.

The east of the site is Queen's Road which provides access to nearby residential roads, to the shopping centre car park, a church and residential shelter home. Nearby residential roads are made up of a mixture of semi-detached two-three storey homes and detached homes.

On the corner of Queen's Road and The Broadway is made up of retail and financial services businesses with either office or homes on upper floors.

To the south of the site is the Broadway, the main road that runs through the centre of the town centre. The Broadway is a mixture of retail uses and mixed uses buildings typically retail at street level with either residential or offices on upper floors.

The main site entrance is found to the south west of the site along The Broadway. Secondary accesses are found along Queen's Road. The site is surrounded by several building types ranging in height from two to four storeys.

The site includes two Grade II listed buildings (Old Town Hall facing The Broadway and the frontage of the Old Fire Station facing Queens Road) and falls within the Broadway Conservation Area.
Site owner: Romulus
Site area: 1.8ha (approx.)
Existing uses: a mixture of town centre uses – retail, restaurants, financial and professional services and offices.
Site allocation: A mixture of town centre types uses such as community (including health/day centre), retail, restaurants and take-away, financial and professional services, offices, hotel, residential.
Site deliverability: 0-5 years
<p>Design and accessibility guidance: The site provides an excellent opportunity for the redevelopment of a substantial brownfield site within the heart of the town centre.</p> <p>The site provides an excellent opportunity to contribute towards a significant improvement to the public realm on Queens Road with priority for pedestrians and cyclists and less traffic dominated.</p> <p>Development proposals must have regard to the design-led Future Wimbledon SPD (Supplementary Planning Document).</p> <p>Development proposals must provide links and access to Wimbledon Station and nearby bus stops, which surround the site. They must also look to facilitate a potential road bridge linking Queen’s Road and Alexandra Road to the rear of the site.</p> <p>Development proposal must be sensitive, protect and enhance listed building on the site and improve their setting.</p> <p>The site is within an Opportunity Area (designated in the London Plan). The London Plan ambition for our OA, is to deliver 5000 new homes and 6000 jobs (indicative figures) up to 2041. Any site within the OA is expected to positively contribute to its environmental, social and economic growth.</p>
<p>Infrastructure requirements:</p> <p>Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan.</p> <p>Enhance and expand existing public realm around the site, particularly at Queens Road and on part of The Broadway. Provide enhanced public cycle parking facilities, including a secure hub for commuters and make provision to accommodate cycle/ scooter hire schemes.</p> <p>The site also provides opportunities to explore options to incorporate “last mile” sustainable consolidation delivery solutions serving the site as well as the wider town centre and area.</p> <p>This site is in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.</p> <p>This site is in an area identified as being deficient in access to children’s play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.</p> <p>The developer and Merton Council must engage with the Metropolitan Police Service (MPS) as part of any pre-application and planning application for this site, due to the proximity of the site to the Wimbledon Police Station.</p> <p>The developer should contact SGN to discuss requirements for any improvements to the gas infrastructure network.</p> <p>The site is adjacent to rail tracks which are used by National Rail and District Line services and will also form part of Crossrail 2. The developer will have to consult and engage with Transport for London, Network Rail and Crossrail 2 as part of any emerging proposals on this site.</p>

Thames Water has identified the scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. It is recommended that the developer liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> The Council will require evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development of this site.

The developer must consult and engage with the Metropolitan Police Service (MPS) on any development proposals to prevent adverse impacts of future development affecting the MPS's operational facilities. The Council will also engage as seek advice from the MPS

The site location

Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD
Impacts Listed Buildings or undesignated heritage assets.	Yes
Impacts a Conservation Area.	Yes.
Impacts an Archaeological Priority Area.	No
Impacts a Scheduled Ancient Monument.	Yes
In a Flood Zone.	No
Is in a town centre.	Yes
Is in an Opportunity Area.	Yes
Impacts a designated open space.	Yes
Public Transport Accessibility Level (PTAL).	PTAL 6a excellent access to public transport



04. CLIMATE CHANGE

Strategic Policy CC8.10

Promoting Sustainable Design to Mitigate and Adapt to Climate Change

To make Merton a more environmentally sustainable place and net-zero carbon by 2050 [1], We aim to reduce greenhouse gas emissions and increase local resilience to the impacts of a changing climate through sustainable design.

This will be achieved by requiring all development to:

- a. Minimise greenhouse gas emissions and support the transition to a low carbon society by maximising energy efficiency, low carbon heat and local renewable energy generation;
- b. Support the principles of the circular economy and promote more effective resource use, to ensure that resources are kept in use for as long as possible and to minimise waste;
- c. Recognise and adapt to Merton's changing climate and ensure that development mitigates the risk of overheating and flooding, and maximises comfort and wellbeing in a changing climate;
- d. Maximise opportunities to enhance green infrastructure and tree planting to deliver multi-functional benefits such as minimising the urban heat effect, enhancing natural carbon sinks and improving air quality; and
- e. Promote healthy and sustainable lifestyles in line with Merton's net-zero carbon target.

Justification

- 1.1.1. In accordance with Paragraph 149 of the NPPF 2019 and Paragraph 152 of the Draft NPPF 2021, 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'

A Climate Emergency and carbon reduction targets

- 1.1.2. In 2018, the Intergovernmental Panel on Climate Change (IPCC) published a Special Report [2] which concluded that global greenhouse gas emissions¹ need to reach net-zero by 2050 in order to keep global temperature rise below 1.5°C and minimise damaging climate impacts on human and natural systems. In May 2019, the Committee on Climate Change (CCC) recommended a new long-term emissions target for the UK: net-zero greenhouse gases by 2050 [3]. Following the adoption of the Climate Change Act 2008 (2050 Target Amendment) Order in 2019, the UK has a statutory requirement to reduce its greenhouse gas emissions by 100% by 2050 (based on 1990 levels) [4].
- 1.1.3. Furthermore, in his 1.5C Compatible Climate Action Plan 2018 [5] and Environment Strategy 2018 [6], the Mayor of London committed to London becoming a net-zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy.
- 1.1.4. In July 2019, Merton Council declared a Climate Emergency and committed to working towards becoming a carbon neutral borough by 2050 and a carbon neutral Council by 2030 [7], in line with the national and regional targets mentioned above. Merton's Climate Strategy & Action Plan [1], which was approved by Council on 18th November 2020, sets out the key actions required to achieve these carbon reduction targets across a range of sectors: economy, transport, buildings and energy, and green spaces.

¹ Also referred to throughout the Local Plan as carbon emissions.

- 1.1.5. By 2050, Merton will need to decarbonise activities across all sectors. This will require: a transition to a low carbon and circular economy which promotes the effective use of resources and minimises waste; all journeys using petrol and diesel vehicles will need to be replaced by low carbon alternatives such as cycling and walking, and low carbon vehicles; and emissions from all existing and new buildings will need to be net-zero carbon by minimising energy demand, and meeting all our energy needs using renewable and low carbon energy [1] [8].
- 1.1.6. With some 81% of greenhouse gas emissions in Merton being generated from the energy used to heat and power our buildings, decarbonising our building stock will be a fundamental step in becoming a net-zero carbon borough [1]. The following policies aim to drive net-zero carbon development in Merton through sustainable design. These policies should be read alongside Merton's Design and Housing policies.
- 1.1.7. However, development should also encourage sustainable lifestyles more broadly. For example, development should reduce the need to travel, particularly by private car, and ensure that the largest possible share of journeys are made by active travel and public transport, as set out in Merton's Travel & Urban Mobility policies. We also encourages development to support community-led initiatives such as local food growing as set out in Merton's Green Infrastructure and Health & Wellbeing policies.

The role of sustainable design in getting to net-zero carbon

- 1.1.8. All buildings in Merton will need to operate at net-zero carbon by 2050 in order to achieve our carbon reduction target. A building which operates at net-zero carbon does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy [9].
- 1.1.9. Extensive retrofit will be required to decarbonise Merton's existing building stock given that low carbon heat solutions require reasonable levels of energy efficiency (at least an Energy Performance Certificate (EPC) rating of C) [5], and more than three quarters of Merton's 88,000 homes have an EPC rating of D or below [1]. The costs of achieving higher standards via retrofit are three to five times higher than for new buildings and the carbon impact of delayed action is significant [10]. Merton's decarbonisation pathways modelling, estimated that retrofitting Merton's existing building stock would cost in excess of £2.7 billion [8].

- 1.1.10. In order to achieve our carbon reduction target as cost effectively as possible, all new development must therefore be fit for the future (i.e. be ultra-energy efficient and climate resilient, and maximise low carbon and renewable energy) [11]. Any new buildings which are not built to operate at net-zero carbon will require expensive retrofit in the next 30 years.
- 1.1.11. Current housing projections for Merton indicate that around 29,000² new dwellings could be built in Merton between 2021 and 2050. Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.
- 1.1.12. Developers must consider sustainability early in the design process in order to maximise energy and carbon savings, and minimise construction and operational costs.

The policy gap and the need for higher local standards

NATIONAL STANDARDS – PART L OF BUILDING REGULATIONS

- 1.1.13. The UK Green Building Council defines a net-zero carbon operational building as follows: "When the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset."
- 1.1.14. There is a significant gap between current building standards (Part L 2013) and the standards required to become net-zero carbon by 2050 [12]. In order to achieve a net-zero carbon balance across the UK housing stock, LETI found that all new development will need to be designed to achieve an Energy Use Intensity (EUI), i.e. energy use measured at the meter, of 35kWh/m²/yr [9]. However, the current Part L average EUI is 140 kWh/m²/yr.

² Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan target for Merton of 918 new dwelling per year for the remaining 15 years to 2050. See Housing policies for further details.

- 1.1.15. It is widely accepted that there is a significant performance gap between predicted and actual performance using the Part L methodology [9] [11]. Reasons for this include, but are not limited to, the following:
- Part L does not address emissions associated with unregulated equipment such as fridges, washing machines, cooking equipment, computers, etc. which can represent up to 50% of a building's operational emissions [9]. This means that a building achieving a 100% improvement against Part L doesn't necessarily achieve net-zero carbon operational emissions.
 - The relative improvement approach against a notional building used in Part L does not reward more efficient building forms which ultimately provide more energy and carbon savings [12].
 - Delays in incorporating up to date carbon factors in Part L can lead to perverse modelling outcomes by overestimating the carbon savings from gas given that the carbon factors currently used in Building Regulations do not take into account the decarbonisation of the electricity grid achieved since 2012 [10]. Part L also overestimates the emissions associated with electricity use over a building's lifetime as it does not consider impacts of further projected reductions in carbon intensity of electricity in coming decades.
- 1.1.16. In addition, in recent years, policies supporting low-carbon homes, such as Zero Carbon Homes and Code for Sustainable Homes, have been weakened or withdrawn at a national level [11]. Policy proposals encouraging high energy efficiency such as the 'Interim' and 'Full' Fabric Energy Efficiency Standards defined by the Zero Carbon Hub in 2009 [13] have not been enforced through Building Regulations which has led to the development of buildings which are not future-proofed for 2050 [14].
- 1.1.17. Building Regulations are expected to be updated in 2022 and 2025 but current proposals for the Future Homes Standard 2025 do not address the shortcomings set out above and are not ambitious enough to deliver the savings required to achieve our carbon reduction targets [15] [16] [17] [18].

REGIONAL STANDARDS – THE LONDON PLAN

1.1.18. In order to drive greenhouse gas and energy savings in London, the Mayor has implemented a zero carbon policy for all major residential developments since 2016, and this policy was extended to major non-residential developments in the London Plan 2021. This policy aims to achieve net-zero carbon development in London, however, in practice, there are a number of shortcomings to the policy which must be addressed in order to genuinely achieve our net-zero carbon target:

- A development which achieves a 100% improvement against Part L on site in line with the Mayor's zero carbon policy, does not necessarily achieve net-zero carbon operational emissions given that the current Part L methodology does not account for unregulated emissions [12].
- The London Plan allows for up to 65% of a development's regulated emissions to be offset through cash-in-lieu contributions which shifts the responsibility for offsetting any residual emissions to the local authority [12]. However, in order to achieve our net-zero carbon target, emissions will need to reduce close to zero without offsetting, so carbon offsetting must not be heavily relied upon and should only be considered where further savings cannot be achieved on-site [9] [3].
- The cost of carbon used to offset a development's carbon shortfall included in the London Plan does not incentivise developers to achieve further carbon savings on site as it does not reflect the actual cost of implementing carbon saving measures [12]. This in turn also limits the carbon savings which can be achieved through carbon offset funds and prevents a zero carbon balance from being achieved.
- The Mayor's zero carbon policy only applies to major schemes which represent less than 10% of schemes in Merton. However, all buildings, regardless of the scale of development, will need to be net-zero carbon by 2050 in order to achieve our carbon reduction target.

1.1.19. We are committed to driving sustainable design and minimising greenhouse gas emissions through local policies in Merton. Policies CC8.11 to CC8.13 are intended to go beyond the London Plan requirements to drive building energy performance which is compatible with our 2050 net-zero carbon target, by maximising on-site savings through energy efficiency and low carbon and renewable energy generation. These policies set out Merton's requirements based on the current Building Regulations (2013) Part L methodology, but also embed recommendations from the Zero Carbon Hub, the CCC 's report on making UK housing fit for the future and LETI's Climate Emergency Design Guide where possible.

- 1.1.20. In addition, as operational emissions decrease with the roll out of low carbon heat and higher energy efficiency standards, embodied emissions will make up an increasing proportion of a development's whole-life cycle emissions. Policy CC8.14 sets out Merton's requirements to minimise embodied carbon and Policy CC8.15 sets out the sustainability standards required of development in Merton.

Climate adaptation in Merton

- 1.1.21. There is extensive evidence that human-induced global warming has already caused significant changes to the climate system including an increased frequency and intensity of extreme weather events such as heatwaves and heavy precipitation events [2] [3]. This trend is expected to continue as the magnitude of warming increases.
- 1.1.22. Impacts in London will likely include increased heat, flooding and drought, with a greater frequency of severe weather events [19]. In order to ensure climate resilience in our communities and minimise future climate-related human and financial costs, these risks will need to be embedded in how we design the buildings in which we live and work by minimising the risk of overheating, flooding, subsidence and water shortages.
- 1.1.23. We will require all development proposals to demonstrate that they are well designed, fully adaptable and resilient to the impacts of a changing climate, and will not exacerbate any climate change impacts elsewhere.
- 1.1.24. Climate adaptation has been embedded within the relevant sections of the Local Plan. Overheating of buildings and subsidence are addressed in the Design policies; flooding, water shortages and the urban heat island effect are covered in the Green & Blue Infrastructure policies; and water use from development is addressed in Policy CC8.15 Sustainable Design Standards below.
- 1.1.25. Merton's climate change policies should be read alongside Chapter 9 Sustainable Infrastructure of the London Plan 2021.

Policy CC8.11

Minimising Greenhouse Gas Emissions

We will require all proposed development within the borough to demonstrate that the fullest contribution to minimising greenhouse gas emissions has been made on site.

This will be achieved by requiring:

All development:

- a. To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London's Energy Hierarchy below, or in line with any future locally derived methodology:
 - i. Be lean: use less energy and manage demand during operation
 - ii. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - iii. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - iv. Be seen: monitor, verify and report on energy performance

All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:

- b. To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.
- c. To achieve the relevant minimum carbon reduction targets as set out in the table below:

Development Type	Minimum on-site total reduction in CO ₂ ³
Major residential development of 10 or more dwellings (including new build, change of use, conversions and major refurbishments)	60%
Minor new build residential development of 1 or more dwellings ⁴	60%
Minor residential change of use and conversions resulting in the creation of 1 or more dwellings	35%
Non-residential development of 500sqm GIA or more (including new build, change of use and major refurbishments)	50%

All new build development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:

- d. To demonstrate compliance with the Mayor's net-zero carbon target, or any future locally derived target.
- e. Where it is clearly demonstrated that the net-zero carbon target cannot be fully achieved on site beyond the minimum requirements, any carbon shortfall to be provided, either:
 - i. through a cash in lieu contribution to Merton's carbon offset fund, or
 - ii. off-site provided that an alternative proposal is identified, delivery is certain and subject to agreement with the council.

³ This represents a minimum improvement beyond Part L of Building Regulations 2013. When Building Regulations are updated we will seek to apply an equivalent standard against the new Building Regulations.

⁴ Throughout, this refers to gross residential development.

Justification

The Mayor's Energy Hierarchy and Zero Carbon Policy

- 1.1.1. In line with the London Plan, all developments in Merton are required to maximise on-site carbon savings in accordance with the Mayor of London's energy hierarchy through energy efficiency, the use of clean energy, and on-site renewable energy generation.
- 1.1.2. Since 2016, the Mayor has implemented a zero carbon policy for all major residential developments (i.e. of 10 or more dwellings) to drive greenhouse gas and energy savings in London. This policy was extended to include major non-residential developments (i.e. of 1,000sqm GIA or more) in the London Plan in 2021.
- 1.1.3. To date, the Mayor's zero carbon policy has only been applied to major schemes in Merton. However, over 90% of developments in Merton are built as minor schemes (i.e. 10 homes or less, or 1,000sqm non-residential GIA or less), of which a large proportion involves conversions and change of use to create new dwellings⁵. While individually these developments do not represent a large source of carbon emissions, their cumulative impact will significantly affect Merton's ability to achieve our national, regional and local carbon reduction targets. In order to become a net-zero carbon borough by 2050, all development, regardless of its size, will need to reduce its greenhouse gas emissions to near zero on site, and become net-zero carbon or net-positive buildings⁶ [1].
- 1.1.4. In order to drive carbon reductions in Merton's existing and new building stock, all development will therefore be expected to seek new, innovative and robust approaches to reducing energy demand and carbon emissions on site. All applications resulting in the creation of 1 or more new dwellings or 500sqm⁷ or more non-residential GIA (in both new and existing buildings) will need to provide an energy statement to demonstrate how carbon savings have been maximised at all stages of the energy hierarchy and that all reasonable endeavours have been made towards achieving net-zero carbon emissions on site.

⁵ Around 90% of applications received for non-residential developments are smaller than 1000sqm GIA. The vast majority of residential applications (around 7,000 in the last 5 years) are householder applications (i.e. proposals to alter or enlarge a single house, e.g. extensions). A large proportion of residential applications (over 1,000 in the last 5 years) are minor applications for the creation of new dwellings (including new build, conversions and change of use). A relatively small proportion of residential applications (around 100 in the last 5 years) are major applications.

⁶ A building which generates more energy on-site than it uses on an annual basis.

⁷ Since 2011, Merton has applied the London Plan policies to all non-residential schemes of 500sqm GIA or more given that a significant proportion of non-residential schemes in Merton are less than 1000sqm GIA.

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- 1.1.5. In addition, all new build development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA will need to demonstrate compliance with the Mayor's net-zero carbon target, or any future locally derived target. This means that any carbon shortfall⁸ will need to be offset via renewable energy generation offsite or via cash-in-lieu contributions.
- 1.1.6. Any development involving the change of use or conversion of an existing building will not be required to offset the carbon shortfall. This is to encourage the refurbishment of existing buildings and disincentivize the demolition of retrofittable buildings, in order to minimise embodied carbon emissions from development. However, all development will be expected to maximise carbon savings on site towards the net-zero carbon target.
- 1.1.7. As set out in policy CC8.10, the Mayor's zero carbon target is not a reflection of true net-zero carbon development because it enables a significant proportion of regulated emissions to be offset via cash-in-lieu contributions and does not take into account unregulated energy uses. To address this gap, we have introduced higher on-site carbon reduction targets to maximise on-site savings as set out below, specified additional requirements to minimise energy demand and unregulated emissions in Policy CC8.12, and set out further requirements to maximise renewable and low carbon energy generation in Policy CC8.13.
- 1.1.8. This net-zero carbon target will be reviewed as and when national and regional policy changes (e.g. updates to Building Regulations expected in 2023 and 2025 and any updates to the London Plan), and as part of the Local Plan review in 5 years.

Minimum onsite carbon savings

- 1.1.9. The aim of the Mayor's zero carbon policy is to drive carbon savings on site and ensure that any carbon shortfall which cannot be addressed on site is offset elsewhere in the borough to achieve a net-zero carbon balance. However, in practice, the current London Plan 2021 approach (35% minimum target) allows up to 65% of carbon emissions from development to be offset via cash-in-lieu contributions, which shifts the responsibility to the local authority to make the scheme compliant. In order to achieve our carbon reduction commitments, on-site emissions will need to reduce close to zero, so carbon offsetting must not be heavily relied upon and should only be considered where further savings cannot be achieved on site [9] [3].

⁸ Using the Part L methodology, or any future locally derived methodology.

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- 1.1.10. In 2019/2020, a study commissioned by several London boroughs, to investigate the cost of carbon and its role in achieving greater carbon reductions on site, found that the London Plan on-site carbon reduction targets and cost of carbon are inadequate for delivering the savings required to achieve net-zero carbon [12]. The study demonstrated that, using more up to date carbon emissions factors than those used in Building Regulations 2013 (SAP 10 and SAP 10.1)⁹, with an efficient low carbon heating system (e.g. a heat pump) and reasonable levels of fabric and ventilation performance, new build residential and non-residential developments can and should achieve at least a 60% and 50% improvement against Building Regulations 2013 respectively. The decarbonisation of the electricity grid means that, for the same specifications, a greater improvement over Part L is achieved with no extra effort/cost.
- 1.1.11. In order to drive on-site carbon reduction, we therefore require all major residential development of 10 or more units (including new builds, change of use, conversions and major refurbishments) and all minor new build residential development of 1 or more units to achieve at least a 60% improvement against Building Regulations 2013 on site. All non-residential development of 500sqm or more GIA (including new builds, change of use and major refurbishments) will need to achieve at least a 50% improvement against Building Regulations 2013 on site. All minor change of use and conversions resulting in the creation of 1 or more dwellings will need to achieve at least a 35% improvement against Building Regulations 2013 on site to account for the limitations associated with existing buildings and small-scale development.
- 1.1.12. These minimum onsite targets will be reviewed over time unless there is a local or national change in methodology for assessing building energy performance. we will seek to apply an equivalent standard when Building Regulations are updated.
- 1.1.13. However, all development is expected to get as close to zero-carbon emissions onsite as possible, and will need to demonstrate that on-site savings have been maximised at all stages of the energy hierarchy whether the minimum on-site target has already been met or not. For new build development, offsetting any carbon shortfall via cash-in-lieu contributions or via offsite renewable energy generation will only be considered where the council is satisfied that on-site savings have been maximised.

⁹ The use of outdated carbon emissions factors in Building Regulations means that SAP assessments currently don't reflect the actual carbon emissions associated with the expected operation of a development and significantly overestimate the expected lifetime carbon emissions from electricity use given that they do not reflect the decarbonisation of the electricity grid (Currie & Brown, 2019). This means that savings from the use of certain technologies, such as Combined Heat and Power (CHP) and solar photovoltaic (PV), are currently overestimated, whilst the savings achieved from the use of other technologies, such as heat pumps or mechanical heat ventilation recovery, are underestimated.

Carbon offsetting for new build development and the cost of carbon

- 1.1.14. In order to genuinely deliver net-zero carbon development, carbon pricing must:
- Drive on-site savings by making it more cost effective for developers to deliver the savings on site than to opt to buy out of their obligation by paying carbon offset contributions; and
 - Where offsetting is required, ensure that carbon offset contributions are sufficient for the local authority to pay for measures which achieve carbon savings equivalent to the carbon shortfall of the development. Otherwise developers are not achieving net-zero carbon development and the local authority cannot deliver a net-zero carbon policy [12].
- 1.1.15. Etude et al. [12] found that the London Plan carbon offset price (£95/t in the London Plan 2021) is too low to actually deliver equivalent carbon savings and therefore does not incentivise sufficient on-site savings. Indeed, the cost of installing additional PV to achieve further improvement on site is currently at around £190/t and this cost is expected to increase to £325/t using the SAP 10.1 carbon factors as a result of the further decarbonisation of grid electricity. This means that, using the cost of carbon recommended in the London Plan, it is cheaper and easier for developers to offset carbon emissions via cash-in-lieu contributions than it is to achieve the actual savings on site, resulting in developments with higher operational emissions.
- 1.1.16. Etude et al. also found that it would cost a local authority at least £300/t to save carbon in a sustainable way, taking into account administration and management costs [12]. Local authorities therefore have insufficient funds to deliver equivalent carbon savings off site through cash-in-lieu contributions using a cost of carbon of £95/t.
- 1.1.17. In order to incentivise developers to implement lower carbon strategies on site where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30 years) will therefore be offset at a rate of £300/t as at 2021. The price for offsetting carbon is regularly reviewed. Any changes to Merton's suggested carbon offset price will be updated in future guidance.

- 1.1.18. Where a developer is proposing to directly offset any shortfall in carbon dioxide emissions from the proposed development by installing carbon dioxide saving measures off-site (e.g. photovoltaic panels on a local school), this will need to comply with the GLA's Carbon Offset Fund Guidance, and any relevant local guidance. Any offsite proposals will need to be agreed with the council's Climate Change team and confirmed in the energy statement.
- 1.1.19. Etude et al. [12] modelled a number of technical scenarios and demonstrated that several low carbon solutions (involving good practice or ultra-low energy fabric, and a range of low carbon heating systems) achieved the proposed minimum on-site targets across several typologies.
- 1.1.20. These scenarios were modelled using different approaches to carbon offsetting to determine their associated construction and carbon offset costs, which were tested as part of Merton's Local Plan Housing Viability Study [20].
- 1.1.21. Developers will be expected to adopt the highest possible standards of fabric and ventilation and heating plant to maximise carbon savings on site. Any development that fails to achieve the necessary on-site performance targets or to demonstrate that carbon savings have been maximised, must provide full evidence and justification as to why the scheme is unable to comply. Where the developer contends the policy requirements in relation to viability of a particular proposal, the onus would lie with the developer to demonstrate what can viably be achieved through the submission of a viability assessment. We may seek payments from applications for the cost of independent viability assessment(s).

Policy CC8.12

Minimising Energy Use

We will require all proposed development within the borough to demonstrate that they have made the fullest contribution to minimising energy use through energy efficiency on site.

This will be achieved by requiring:

All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA

- a. To demonstrate how energy demand, including regulated and unregulated uses, has been minimised on site through passive measures and by maximising the efficiency of building form, fabric and systems.
- b. To disclose the anticipated Energy Use Intensity¹⁰ at design and pre-occupation stage.
- c. To achieve the following minimum on-site carbon savings through energy efficiency alone, as part of achieving the overall savings set out in Policy CC8.11 (c), in order to reduce energy demand:
 - i. All development resulting in the creation of 1 or more residential units (including new builds, change of use, conversions and major refurbishments) must achieve at least a 10 per cent improvement against Building Regulations 2013 through energy efficiency measures.
 - ii. All non-residential development of 500sqm GIA or more (including new builds, change of use and major refurbishments) must achieve at least a 15 per cent improvement against Building Regulations 2013 through energy efficiency measures.

¹⁰ An annual measure of total energy consumed in a building which can be estimated at design stage and easily monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy.

All new build development resulting in the creation of 1 or more residential unit or 500sqm or more non-residential GIA

d. To demonstrate compliance with the following relevant fabric efficiency targets:

Type of Development	Zero Carbon Hub Interim FEES until 31 December 2022 ¹¹	Zero Carbon Hub Full FEES from 01 January 2023 to 31 December 2024	Space Heating Demand Target from 01 January 2025 ¹²
Blocks of flats and mid-terrace houses	<43 kWh/m ² /yr	<39 kWh/m ² /yr	<15 kWh/m ² /yr
Semi-detached, end of terrace and detached houses	<52 kWh/m ² /yr	<46 kWh/m ² /yr	<20 kWh/m ² /yr
Non-residential development	-	-	<15 kWh/m ² /yr

e. From 2025, to meet the maximum Energy Use Intensity targets as set out in the relevant guidance.

All major development

f. To monitor and report on energy use for 5 years post-occupancy¹³.

¹¹ Based on the Fabric Energy Efficiency Standard for Zero Carbon Homes as defined by the Zero Carbon Hub (2009) [40].

¹² Based on recommendations from the Committee on Climate Change (2019) [11] and the London Energy Transformation Initiative (2020) [9].

¹³ In line with the GLA's 'Be Seen' Energy Monitoring Guidance, or equivalent.

Justification

- 1.1.1. A building's operational carbon emissions are a direct result of its energy use. In order to reduce greenhouse gas emissions and ultimately achieve our carbon reduction targets, a development will therefore first and foremost need to minimise energy use through energy efficiency, as reflected in the first tier of the Mayor's Energy Hierarchy: 'Be Lean'.
- 1.1.2. In addition, the transition to low carbon heat, which is required to deliver long term carbon savings, is contingent on having high levels of energy efficiency [21].
- 1.1.3. Energy efficiency will depend on both building and equipment design. This policy focusses primarily on fabric efficiency, and Policy CC8.13 below addresses the importance of efficiency of plant in decarbonising heat.

The role of energy efficiency in delivering low carbon heat

- 1.1.4. In order to manage running costs and avoid external costs to the grid infrastructure, a transition to low carbon heat can only be achieved through significant improvements to energy efficiency [10]. Indeed, low carbon heating solutions (such as heat pumps and solar thermal) tend to operate most effectively at low temperatures, and are therefore much more sensitive to energy efficiency than conventional gas boiler systems [9]. Indeed, if a building's heat losses are much higher than anticipated, a low temperature heating system has to run at higher operating temperatures to compensate for this, which can result in significant increases in energy use and energy bills [10]. In addition, as we move from gas to electricity to heat our buildings, energy use needs to be minimised to reduce the demand for energy generation and peak loads on the national grid [9] [22].
- 1.1.5. We therefore require compliance with minimum on-site carbon reduction targets through energy efficiency alone in line with the London Plan. Developers will need to demonstrate a 10% and 15% improvement for all residential development resulting in the creation of 1 or more units and non-residential development of 500sqm GIA respectively (including new builds, change of use, conversions and major refurbishments).
- 1.1.6. However, there are limitations to using Building Regulations as a tool for driving energy efficiency. Indeed, the Part L methodology enables low carbon energy to compensate for poor building fabric and doesn't reflect efforts to improve energy efficiency through form [14]. Part L assessments also underestimate carbon savings achieved through improvements to fabric and ventilation, given that they underestimate a development's space heating requirements [12].

The need for fabric energy efficiency standards

- 1.1.7. Improved fabric energy efficiency will ensure that buildings use low and zero carbon energy in the most efficient way [11]. As well as reducing greenhouse gas emissions, using ultra-high levels of fabric efficiency alongside heat pumps and Mechanical Ventilation and Heat Recovery (MVHR) systems can help reduce annual and peak electricity demand, provide comfort and health benefits to occupants, and deliver average bill savings of around £85 per year for a typical three bedroom semi-detached house [11]. This will also help 'future proof' developments and reduce the likelihood of buildings needing difficult and expensive refurbishment at a later date.
- 1.1.8. In 2019, the Committee on Climate Change recommended to the UK government that new homes should deliver ultra-high levels of energy efficiency achieving a space heating demand of 15kWh/m²/yr or less as soon as possible and by 2025 at the latest [11]. In 2020, the London Energy Transformation Initiative published their Climate Emergency Design Guide which concluded that in order to achieve our national carbon reduction targets, all new residential and non-residential buildings should be designed to achieve a space heating demand of 15kWh/m²/yr or less by 2025 [9].
- 1.1.9. In order to give industry the opportunity to adjust, Policy CC8.12 (d) sets out a gradual increase in fabric energy efficiency standards for residential developments. To do this, we will require all new build residential developments to comply with the minimum Fabric Energy Efficiency Standard (FEES) for Zero Carbon Homes defined by the Zero Carbon Hub in 2009.
- 1.1.10. The FEES, measured in kWh/m²/yr and available through the Government's Standard Assessment Procedure (SAP), covers space heating and space cooling energy demand. The FEES allows design flexibility, takes into account building form, promotes innovation and delivers a specific level of dwelling performance. The FEES is much better at recognising efforts made to improve energy efficiency through building form and fabric specifications than a percentage improvement against Building Regulations, as demonstrated by Etude in 2017 [14].
- 1.1.11. The Zero Carbon Hub recommended two different performance levels for (a) blocks of flats and mid terrace houses, and (b) semi-detached, end of terrace and detached houses. This is because certain dwelling types with less exposed fabric relative to floor areas, such as mid-floor apartments, can achieve a lower energy space heating and cooling demand with a less challenging construction specification than other dwelling types.

- 1.1.12. To encourage a gradual shift in fabric efficiency, the Zero Carbon Hub defined an 'Interim FEES' for implementation from 2013 and a 'Full FEES' for implementation from 2016. These standards were never introduced through Building Regulations as a result of the national Zero Carbon Homes policy being scrapped. However, in 2017, Etude demonstrated that both the interim and full FEES were technically feasible and viable with a range of combinations of form and fabric specification [14] and these standards are already being achieved by a number of schemes in Merton.
- 1.1.13. We will therefore require all new residential development to achieve at least the 'interim' FEES until the end of 2022 and at least the 'full' FEES from the start of 2023. In line with the recommendations from LETI and the CCC, we will also require all new build residential and non-residential development to achieve a space heating demand of 15kWh/m²/yr or less by 2025.

Closing the gap between predicted and actual energy demand

- 1.1.14. It is widely accepted that there is a significant performance gap between the energy use and carbon emissions estimated at design stage and the actual in-use performance of buildings using the current Building Regulations Part L methodology, and that this needs to be addressed in order to genuinely make our buildings net-zero carbon [9] [11] [23]. The Part L methodology uses carbon emissions as the main performance metric which is dependent on the carbon factor of the electricity grid and does not necessarily reflect good operational performance. The UK Passivhaus Trust found that new build houses have an average performance gap of 40% between the actual overall energy use compared to the EPC modelling carried out at design stage [22] which means that buildings are emitting significantly more carbon than predicted using the SAP methodology.
- 1.1.15. Managing the performance gap and ensuring good design is particularly important with the roll-out of low carbon heating systems which are much more sensitive to building heat losses and system inefficiencies than traditional gas heating systems [10].
- 1.1.16. In addition, current Building Regulations (2013) do not address unregulated emissions associated with cooking, white goods and other equipment which can represent up to 50% of a building's operational emissions [9]. Operational performance of buildings therefore cannot be verified using the Part L methodology. The CCC has highlighted the importance of improving building performance monitoring and focussing on 'as built' performance in order to close this performance gap which could deliver £70-260 in annual bill savings per household [11].

A new metric for measuring performance: Energy Use Intensity

- 1.1.17. LETI's Climate Emergency Design Guide, which sets out a roadmap to net-zero carbon, recommends the use of Energy Use Intensity (EUI) targets in regulations, policy and design decisions to drive energy efficiency. EUI is an annual measure of total energy consumed in a building which can be estimated at design stage and easily monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy [9].
- 1.1.18. In order to improve our understanding of energy demand and drive more energy efficient design of buildings, we require all developments resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA to determine their anticipated EUI, at planning and pre-occupation stage. Major schemes will need to calculate the anticipated regulated and unregulated energy demand, and combined EUI, using the Chartered Institute of Building Service Engineers (CIBSE) TM54 methodology, Passive House Planning Package (PHPP) methodology or equivalent, or successor methodologies¹⁴. Minor residential schemes resulting in the creation of one or more dwellings will need to estimate the expected regulated and unregulated energy demand, and combined EUI, using the Part L methodology or equivalent, or successor methodologies.
- 1.1.19. In addition, all major developments are required to monitor and report actual operational energy performance for at least five years post-occupancy in line with policy SI 2 in the London Plan 2021 and the GLA's 'Be Seen' Energy Monitoring Guidance 2020, or equivalent.

¹⁴ These methodologies enable more accurate determination of the anticipated energy demand and carbon emissions by considering factors which impact on a building's energy performance including expected occupancy and use, and calculate unregulated loads [41]. These methodologies can also be used to verify the performance of the constructed building in operation, which is not possible with Building Regulation Part L percentage reductions.

- 1.1.20. In 2019, Currie and Brown also recommended that absolute performance targets are used to reduce energy demand (peak demand in particular) in order to reward energy efficient designs and minimise running costs and pressures on the national grid [10].
- 1.1.21. LETI have identified energy consumption targets for four building typologies consistent with achieving national net-zero carbon targets; LETI concluded that all new build development should be designed to achieve these standards by 2025 [9]:
- **Small scale residential** – reducing EUI to 35 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
 - **Medium and large scale residential** – reducing EUI to 35 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
 - **Commercial offices** – reducing EUI to 55 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
 - **Schools** - reducing EUI to 65 kWh/m²/yr in GIA excluding renewable energy contribution, and reducing space heating demand to 15 kWh/m²/yr.
- 1.1.22. We expect all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future-proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. We will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to consider the latest evidence and technologies.
- 1.1.23. Developments are also encouraged to adopt recognised and successful fabric first approaches such as Passivhaus which is seen as the most stringent low ‘energy in use’ standard and is consistent with LETI’s Climate Emergency Design Guide. This standard also relies on a more accurate energy demand assessment methodology using the Passive House Planning Package (PHPP).

Policy CC8.13

Low Carbon Energy

All proposed developments within the borough must demonstrate that they have made the fullest contribution to supplying energy efficiently and cleanly, and maximising renewable and low carbon energy generation, storage and use, through the deployment of appropriately selected, sized and sited technologies.

This will be achieved by requiring:

- a. All new development to use low carbon heat. There can be no gas boilers in new dwellings or new non-domestic development in Merton from January 2023.
- b. All development proposals to demonstrate in the energy statement:
 - i. How the proposal has made the best potential use of roof space to maximise local renewable and low carbon electricity and/or heat generation – 100% of energy demand should be met by renewable energy generation on site wherever possible;
 - ii. How appropriate roof spaces have been utilised to maximise the delivery of multi-functional benefits (e.g. co-location of renewable energy and green, brown or blue infrastructure);
 - iii. How demand-side response has been incorporated, specifically through the installation of smart meters, minimising peak energy demand and promoting short term energy storage;
 - iv. How the proposal has ensured efficient generation of low carbon energy on site; any developments proposing to use heat pumps to demonstrate that these are good quality and achieve a minimum standard of efficiency; and
 - v. How all major development proposals located within identified heat network opportunity areas have utilised decentralised energy, or are enabled for connection to current or future district heat networks, unless it is demonstrated that it is not technically feasible to do so.

Justification

- 1.1.1. In order to have net-zero carbon emissions, once energy demand has been minimised, the remaining energy we use to power and heat our buildings will need to be generated from clean, low carbon and renewable sources [9].

The decarbonisation of heat

- 1.1.2. Low carbon heat is an essential component of our roadmap to net-zero carbon given that heat accounts for a third of the UK's greenhouse gas emissions [11] [21]. BEIS' Clean Growth Strategy emphasized that a fundamental shift away from fossil fuels for heating is required, alongside reductions in energy demand through energy efficiency [24]. In 2015, the Energy Technologies Institute estimated that 20,000 households per week would need to be switched from gas to low carbon heating between 2020 and 2050 in order to bring emissions from the UK's existing housing stock to near zero carbon [25].
- 1.1.3. 98% of homes in Merton use gas as their primary source of heating. All buildings in Merton must be gas free by 2050 in order to achieve our carbon reduction target, unless the Government plan to supply a low carbon gas through the gas grid [1]. There is increasing interest in the use of hydrogen and biomethane as low carbon alternatives to gas [24], but insufficient evidence is currently available to demonstrate that either of these are credible options for wide-scale decarbonisation of heat in the short term [26] [27] [12] [28]¹⁵.
- 1.1.4. Low carbon heating generally requires different space heating design standards to gas heating as the former tends to operate most effectively using a low temperature system whereas the latter operates at high temperatures [10]. A building typically has a lifespan longer than 30 years, so any new building which is designed and built to use a high temperature heating system will require retrofit to move to a low carbon system before 2050.
- 1.1.5. In their 2019 study [10] on the costs and benefits of tighter energy efficiency standards, Currie & Brown demonstrated that delayed action in decarbonising heat would have a significant carbon impact: each year of delay in adopting lower-carbon heat technologies could result in several million tonnes of avoidable carbon emissions. They found that a home built to use gas heating in 2020 which is retrofitted to use a heat pump in 2030 can be expected to emit over three times more carbon over 60 years than if the heat pump was installed from the start, as the house would have originally been built to different space heating design standards.

- 1.1.6. The costs of installing low carbon heat as a retrofit are also between three and ten times higher than delivering them in a new building [10]. The Clean Growth Strategy highlighted the importance of ensuring that all new homes can accommodate low carbon heating in order to avoid the need for expensive retrofit further down the line. In their 'UK Housing: Fit for the Future?' report (2019), the CCC concluded that no new homes should be connected to the gas grid from 2025 at the latest, with ultra-low energy homes using low carbon heat instead [11].
- 1.1.7. In order to drive the decarbonisation of heat in Merton and minimise the retrofit burden, we require all new development to use low carbon heat efficiently. Any development that proposes to use gas-powered systems will need to provide robust justification to satisfy the council that low or zero carbon systems cannot be used, to set out how the development has been future-proofed to achieve net-zero carbon by 2050, and to demonstrate that the gas-powered system is credibly being used as a stepping stone towards this objective. No gas boilers can be installed in new dwellings or new non-domestic development from January 2023.

The electrification of heat

- 1.1.8. The electrification of heat will likely play a major role in decarbonising heat. As well as becoming a lower carbon energy source with the decarbonisation of the national grid, electricity also provides air quality benefits which are particularly important in a London-borough [12]. There are a range of technologies that can convert electricity into heat including heat pumps and direct electric heating systems.
- 1.1.9. Proposals using direct electric heat will only be deemed acceptable if the developer can demonstrate, through Passivhaus certification or equivalent, that energy use has been significantly reduced by achieving ultra-high fabric efficiency [12]. This is to ensure that direct electric heating systems do not result in high energy bills for future residents, and to mitigate the risk of fuel poverty.
- 1.1.10. Heat pumps¹⁶ are likely to play a growing role in the delivery of low carbon heat in London, as part of both low carbon heat networks and individual building heating systems [26]. Well designed, installed and maintained heat pumps can be very energy efficient and a way of harnessing waste heat. Heat pumps typically achieve efficiencies between 260 and 320% [26], whereas direct electric systems and gas boilers typically operate between 80 and 100% efficiency [21]. In addition, heat pumps use low flow temperature and large emitters to spread heating throughout the day, resulting in reduced peak heating demand compared to gas boilers and direct electric systems which operate when heat is desired [21]. Heat pumps also have the benefit of being smart grid ready which could enable demand-side response.

- 1.1.11. Heat pumps are already a lower carbon system than gas boilers, and the carbon factor for grid electricity is expected to decrease further as more renewable energy is produced, while the carbon content of gas is likely to remain the same unless low carbon gasses are introduced to the gas grid [12]. Heat pumps also provide air quality benefits given that they do not produce any direct emissions on site.
- 1.1.12. Low-carbon heat using a heat pump is cost effective when built into new homes from 2021 and should not increase running costs if the system is well designed, installed and operated, particularly in well-insulated buildings [10]. Heat pump deployment in new build properties will also play an important role in helping develop the heat pump markets and supply chains required to electrify heat in our existing building stock [27].
- 1.1.13. However, inappropriate design, installation or operation of heat pumps can result in high energy costs and increased peak electricity demand. In order to mitigate impacts on the electricity grid and operating costs, electrical heating systems must be highly efficient and paired with high fabric efficiency [9] [26]; high performance building fabric is critical to enable the electrification of heat while keeping costs low for future residents. All new development should also be designed to harness heat at low temperatures given that heat pumps tend to operate significantly more efficiently at lower temperatures and waste heat sources are also typically at lower temperatures [9].

- 1.1.14. Where heat pumps are proposed, developments will need to demonstrate that efficiencies have been maximised through the proposed technology and heating system. A high specification of energy efficiency (coefficient of performance) will be expected to ensure the system works efficiently and reduces running costs and peak electricity demand. UKPN has indicated that they will actively plan for additional demand due to heat pumps, provided they have early visibility of any deployment plans, and are notified of installations on their networks [26].

Decentralised energy

- 1.1.1. The use of decentralised energy and local secondary heat sources is expected to play a significant part in reducing emissions from buildings in London [29]. All major development proposals will be expected to comply with London Plan policies on decentralised energy networks and decentralised energy.
- 1.1.2. The council will require all proposed major development and regeneration schemes within any identified heat network opportunity areas to fully explore and utilise decentralised energy, subject to technical and financial viability. Heat-mapping and feasibility studies undertaken by AECOM in 2017 [30]/2018 [31] identified two district heat network opportunity areas in Merton linked to two major regeneration schemes: Morden town centre and South Wimbledon (High Path estate).
- 1.1.3. Any proposals to develop or connect to a site-wide or district heat network will need to demonstrate compliance with all Merton's climate change policies, be future-proofed and demonstrate that heat losses have been minimised. Given that the carbon savings from gas engine combined heat and power (CHP) systems are declining due to the decarbonisation of the national electricity grid, and increasing evidence of adverse air quality impacts, developers will be required to use low and zero carbon heat sources and existing heat networks will need to be decarbonised [29].

Renewable energy generation

- 1.1.4. The use of renewable and low-carbon micro-generation technologies (e.g. solar photovoltaic panels, solar thermal and air source heat pumps) is now a viable, cost-effective and practical approach to ensuring developments can achieve their on-site carbon emissions requirements alongside low carbon heat and high energy efficiency, and will play a crucial role in achieving our net-zero carbon target [24] [12] [9].

- 1.1.5. In order to genuinely operate at net-zero operational carbon, all buildings must be 100% powered by renewables [9]. As renewable energy generation increases in the UK, grid electricity will continue to decarbonise [8]. However, electricity demand is expected to increase across London as a result of population growth, the electrification of heat and increased uptake of electric vehicles [29]. In order to limit pressure on the national electricity grid, contribute to the decarbonisation of grid electricity (if development feeds back to the grid), and ultimately build a more resilient local energy supply, the council requires all development to demonstrate that on-site renewable energy generation has been maximised and that 100% of energy demand is met through on-site renewable energy generation wherever possible. Developers will need to compare their anticipated Energy Use Intensity (EUI)¹⁷ to the amount of renewable energy expected to be generated on-site annually, and these will be expected to match where feasible.
- 1.1.6. Developments in conservation areas or involving heritage assets need to provide careful consideration of how sustainable energy measures may be incorporated without adversely impacting on the character, function and preservation of a specific area or asset, in accordance with the policies on design in this Local Plan. In such circumstances, development proposals should not presume that a viable sustainable solution cannot be provided. Where necessary, Merton will determine whether the provision of sustainability measures causes any adverse impact with the asset or area, and will prioritise safeguarding of the asset, as appropriate.

¹⁷ See Policy CC8.12 for more details.

Demand-side response and energy storage

- 1.1.7. Demand-side response involves changing how and when electricity is used to minimise peak energy demand. Demand-side response will play an important role in embedding flexibility in our energy systems, improving the utilisation of intermittent low carbon energy generation, and ensuring that energy supply always meets demand whilst reducing pressure on the national grid [32].
- 1.1.8. Energy storage (heat and battery storage) and flexibility will need to be maximised to reduce energy use and pressure on the national grid at peak times, and ensure that variable renewable energy supply can match electricity demand at all times [11] [33] [9]. Advancements in energy storage technology have meant that energy storage is now feasible at individual domestic level, and costs are predicted to continue to fall [10].
- 1.1.9. The council therefore requires all development to demonstrate that demand-side response has been considered and maximised alongside renewable energy generation.

Policy CC8.14

Minimising Waste and Promoting a Circular Economy

We will require all development proposals to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.

This will be achieved by requiring:

All development:

- a. To prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.
- b. To be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in-use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.
- c. To ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime.
- d. To minimise the environmental impact of materials by specifying sustainably-sourced, low impact and re-used or recycled materials; this should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally-sourced wherever possible to minimise transport emissions.

All development resulting in the creation of 30 or more dwellings or 1000sqm or more non-residential GIA, and all development proposing to demolish and rebuild a single dwelling:

- e. To undertake a Whole Life-Cycle Carbon assessment proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximised.

Justification

Embodied carbon and a circular economy

- 1.1.1. The construction of a development uses energy and resources which represent its embodied carbon emissions. Of the annual carbon emissions associated with the UK building stock (existing and new build) 20% is related to the embodied emissions associated with new construction [9]. Climate change policies relating to sustainable design have traditionally focused on reducing operational carbon emissions. However, as buildings become more energy efficient and energy generation is decarbonised, the proportion of operational emissions will significantly reduce and embodied carbon will represent a higher proportion of whole life-cycle carbon emissions. Embodied carbon can represent 40-70% of whole life-cycle carbon emissions in a new low carbon building [9].
- 1.1.2. A circular economy is one that seeks to promote waste minimisation by moving from a more traditional linear model of resource use, consumption and disposal, to one that promotes long-term sustained use, reuse and recycling. Merton is supportive of the move towards a more circular economy. As such, circular economy principles should be embedded across all facets of the development lifecycle - from concept and design to build-out and occupation/ use, in order to increase resource efficiency, minimise operational and embodied carbon emissions, and minimise residual waste, in line with Section R2 of the National Design Codes 'Careful selection of materials and construction techniques' [34].
- 1.1.3. Circular economy opportunities might include using materials with a lower embodied carbon (e.g. timber rather than concrete frame – using timber also provides an opportunity to sequester carbon), using more recycled content in the materials and finding other ways to enhance recovery and recyclability (e.g. reinforcement free concrete). Mechanical and electrical services will typically need to be replaced every 20 years and should therefore be designed to allow easy recovery, reconditioning and reuse whilst also optimising for performance and carbon emissions. Encouraging a 'fabric first' approach to building design can also minimise mechanical plant and services in favour of natural ventilation.
- 1.1.4. In 2020, LETI identified the following best practice upfront embodied carbon targets for buildings designed in 2020 and 2030 [9]:
 - Residential
 - Best practice 2020 <500kgCO₂/m²
 - Best practice 2030 <300kgCO₂/m²

- Non-residential
 - Best practice 2020 <600kgCO₂/m²
 - Best practice 2030 <350kgCO₂/m²

- 1.1.5. The GLA's Whole Life-Cycle Carbon Assessments guidance also provides benchmarks and aspirational benchmarks for different development types.
- 1.1.6. Embodied carbon benchmarks and targets are a developing knowledge area and are expected to be refined over the coming years. LETI has been consulting with industry groups including RIBA, CIBSE, IStructE, the GLA and the Whole Life Carbon Network to align definitions, scopes, measurement methodologies and targets [35].
- 1.1.7. All new build development will be expected to endeavour to minimise embodied carbon in line with best practice targets contained within the latest industry guidance.

Whole life-cycle carbon emissions

- 1.1.8. A whole life-cycle carbon approach which captures a building's operational (regulated and unregulated) and embodied emissions, as well as emissions associated with the maintenance and disassembly and disposal of the development, is required to fully understand the carbon impact of a development. Minimising whole life-cycle carbon emissions through careful and considered use of natural and renewable resources, promoting sustainable construction and minimising energy use are key considerations in securing a sustainable, low carbon future for Merton.
- 1.1.9. The Mayor requires all referable schemes to undertake a Whole Life-Cycle Carbon Assessment in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance 2020, or equivalent. All major schemes are also encouraged to undertake whole-life cycle carbon assessments under the London Plan. In order to drive a reduction in whole life-cycle carbon emissions in Merton's building stock and to develop a better understanding of whole life-cycle carbon emissions associated with development in the borough, we will require all schemes resulting in the creation of 30 or more dwellings or 1000sqm or more non-residential GIA to undertake a Whole Life-Cycle Carbon Assessment.
- 1.1.10. Historically, Merton has received a large number of applications for the substantial or total demolition of a single dwelling house and rebuild as a single dwelling. Such proposals are typically driven by design, intensification or lifestyle rather than on the grounds of structural instability.

- 1.1.11. All such proposals outside of structural instability are considered a highly inefficient use of resources and materials and contrary to the principles of sustainable development and the circular economy. Even where proposals are deemed to result in an improvement of 'in use' energy consumption, the embodied carbon footprint of whole scale demolition and rebuild means that any environmental benefits are unlikely to be realised in the long term.
- 1.1.12. The council therefore requires all proposals to demolish and rebuild a single dwelling to submit a Whole Life-cycle Carbon Assessment proportionate to the scale of development. Developers will be required to demonstrate that the development has been designed and delivered in accordance with the principles of a circular economy to minimise embodied carbon.
- 1.1.13. This policy will also apply in cases where a substantial amount, but not all, of the original building is demolished and rebuilt (for example, where the original façade is required to be retained).

Policy CC8.15

Sustainable Design Standards

We will seek high standards of sustainable design and construction from new development, change of use, conversions and refurbishments to ensure that all development makes effective use of resources and materials, minimises water use, and assists in meeting local and national carbon reduction targets.

This will be achieved by:

- a. Requiring all development to demonstrate that the use of mains water has been minimised by incorporating measures such as smart metering, water saving and recycling measures, including retrofitting where appropriate.
- b. Requiring all major developments and high water use developments to include water saving measures such as rainwater harvesting and greywater recycling to reduce mains water consumption.

Residential development:

- c. Requiring all residential development to meet a minimum internal water efficiency standard of 105 litres per person per day, as set out in Building Regulations Part G or equivalent.
- d. Requiring all conversions and changes to the use of existing buildings resulting in the creation of 10 or more new dwelling(s) to achieve a minimum BREEAM Domestic Refurbishment rating of 'Excellent' or equivalent.

Non-residential development:

- e. Requiring all new build non-residential development of 1,000sqm GIA and above to achieve a minimum of BREEAM Non-domestic New Construction 'Excellent' standard or equivalent.
- f. Requiring all conversions and changes of use to non-residential uses of 1,000sqm GIA and above to achieve a minimum of BREEAM Non-domestic Refurbishment and Fit-out 'Excellent' standard or equivalent.

Justification

BREEAM

- 1.1.1. The principles of sustainable design and construction are designed to be holistic and are more wide-ranging than energy performance alone. National sustainable design and construction standards such as BREEAM ensure that a development's full impact on the environment, including water use, transport and land use and ecology, as well as energy use and waste are considered and addressed. Using these standards or any subsequently adopted set of national sustainable construction standards, will assist in the delivery of a number of the policies covered in the Local Plan including the Transport, Green Infrastructure and Climate Change policies.
- 1.1.2. The highest standards of sustainable design and construction should be applied to improve the environmental performance of new development. Development proposals must demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- 1.1.3. The BREEAM Domestic Refurbishment standard provides a recognised scheme and methodology by which conversions and change of use can demonstrate their adherence to sustainable design and construction methodologies. We therefore require all major schemes resulting in the creation of 10 or more new dwellings through the conversion or change of use of existing buildings to achieve a minimum BREEAM Domestic Refurbishment rating of 'Excellent' or equivalent. In particular, this scheme will help drive energy efficiency improvements across Merton's existing building stock through its post-refurbishment Energy Efficiency Rating requirements.
- 1.1.4. We also require all major development of 1,000sqm or more non-residential GIA (both new and existing buildings) to achieve BREEAM 'Excellent' standard or equivalent.
- 1.1.5. Proportionally, Merton receives a large number of minor development applications which involve the conversion and change of use of existing buildings to create new dwellings. In order to make our housing fit for the future, existing homes must be made low-carbon, low-energy and resilient to a changing climate [11] through the uptake of measures including:
 - Improved insulation in lofts, walls and floors;
 - Double or triple glazing windows;

- Low-carbon heating;
- Draught proofing;
- Highly energy efficient appliances;
- Highly water efficient devices;
- Passive cooling measures such as shading and ventilation;
- Green space to reduce the risks of flooding and overheating;
- Improved flood resilience and resistance.

Minimising water use

- 1.1.6. According to Waterwise, the UK has less available water per person than most other European countries [36]. London is drier than Istanbul, and the south-east of England has less water available per person than the Sudan and Syria. London has lower rainfall than the national average while having an extremely high population density [37].
- 1.1.7. This combination of limited water resources and high demand has resulted in the Environment Agency designating the Thames Water region to be “seriously water stressed” [38]. This trend is very likely to be exacerbated by future changes in climate and population growth [39].
- 1.1.8. All development must therefore be designed to be water efficient and reduce water consumption. we require all development to demonstrate that the use of mains water has been minimised by incorporating measures such as smart metering, water saving and recycling measures, and retrofitting water efficiency measures where appropriate, to help achieve lower water consumption rates and to maximise future-proofing.
- 1.1.9. All residential schemes will be required to demonstrate that internal water usage rates of less than 105 litres per person per day have been achieved. All non-residential development of 1,000sqm GIA and above will be expected to achieve at least the BREEAM Excellent water-efficiency credits.

- 1.1.10. All major developments and high water use developments, such as hotels, hostels and student housing, will be expected to include water saving measures such as rainwater harvesting and greywater recycling to achieve lower water consumption rates.
- 1.1.11. New development, conversions and change of use of all sizes should seek new, innovative and more robust approaches to achieving a high standard of sustainable design and construction.

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05. PLACES & SPACES IN A GROWING BOROUGH

Introduction.

How our streets, town centres, public spaces and neighbourhoods look, feel and function is important for our sense of wellbeing and safety. Merton is made of a number of distinct and diverse places that collectively form the unique character and identity of Merton.

The need to deliver more than 10,000 homes in Merton by 2036 does not outweigh the need for developments to be design-led. The Council will require all development to be of the highest design quality and contribute to the Merton's long-term economic prosperity, quality of life and a net zero carbon future.

The policies in this chapter aim to ensure that all future development is well designed, functional and contributes positively to the borough.

Strategic Policy LP D5.1

Delivering well designed and resilient neighbourhoods.

Developments in the borough are required to meet the highest standards of design, function and construction and help contribute to a net-zero carbon and climate-resilient future. They must respect and positively respond to their context, townscape, landscape and public realm to strengthen Merton's character. Successful neighbourhoods are much more than just buildings. Historic environments, mature vegetation and existing communities all contribute to successful places, and as such must be considered when designing. Delivering sustainable neighbourhoods is as important as delivering the homes themselves.

To achieve this, development should:

- a. Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and existing and emerging good practice guidance.
- b. Champion sustainable design and construction principles, in order to minimise greenhouse gas emissions by considering energy efficiency, re-use of materials and buildings, waste and water management, biodiversity and the use of low carbon and renewable energy sources early in the design process, as set out in policies elsewhere in this plan. Development should be fully adaptable and resilient to the impacts of a changing climate, including overheating, flooding, water shortages/drought and subsidence, and will not exacerbate any climate change impacts elsewhere.
- c. Encourage and enable sustainable and healthy lifestyle choices through effective public realm that facilitates active modes of transport as set out in the chapters in this plan on 'Health and Wellbeing and Transport.
- d. Ensure that the site of the development is appropriate for its proposed function and use through the analysis of site constraints such as air quality, noise pollution, land contamination, flooding (from all sources) and daylight and sunlight.

- e. Seek to appropriately engage with the local communities and stakeholders and the design has been informed by this as set out in the London Plan, Policy GG1.
- f. Enhance social cohesion and mental and physical wellbeing and support the needs of all of Merton's communities through creating sustainable buildings, spaces and environments that are well-managed, accessible, inclusive, child friendly and intergenerational.
- g. Conserve and enhance Merton's heritage assets and distinctive character using Merton specific guidance, such as the Borough Character Study and Conservation Area Appraisals.
- h. Be well-designed from the large scale to the detailed level, being well thought out internally and considering essential practical details early on in the process so they do not undermine quality or cost more at the construction stage.

Justification.

- 1.1.1.** The character, distinctiveness and viability of a successful area often lie in the quality of its built environment and public realm. High quality design of buildings, places and spaces can create a high quality and attractive environment which sets a positive context for the development of successful places and sustainable communities. To help deliver the principles of good design throughout the borough, Merton Council has produced a variety of Supplementary Planning Documents that provide good practice approaches to design, such as Merton's Borough Character Study and Conservation Area character appraisals.
- 1.1.2.** Designing with sustainable and construction principles from the start can help minimise costly changes later on in the process. Buildings that are designed with sustainability at the fore can also be more cost effective in their operation and their delivery.
- 1.1.3.** Principles of good urban design are not just applicable to the quality of individual buildings, but to the arrangement of buildings and public spaces in their environment, how they relate to their context, the spaces they create and also to the way an area functions. These principles need to be applied not just to the physical appearance of a building, but also to its functions and the way it relates to the surrounding area and wider public realm. Good urban design creates buildings and environments that are long lasting and strengthens communities.
- 1.1.4.** The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, resulting in better places in which to live and work.
- 1.1.5.** The National Planning Policy Framework 2019 (NPPF) and 2021 draft provides national policy guidance on design. This policy is a strategic policy, produced in accordance with para 20.d) of the NPPF. It looks to create sustainable neighbourhoods that will last well beyond the plan period and not require future public or private sector intervention to address future strategic or structural issues.

1.1.6. The NPPF states that good design is a fundamental part of the purpose of the planning and development process; and that plans should set out clearly the council's design vision and expectations. More specifically, the NPPF (2019, para 127) states that planning policies and decisions should ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, taking into account the impacts of climate change;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

1.1.7. Merton's target of becoming a carbon neutral borough by 2050, as set out in Merton's Climate Strategy and Action Plan, means that future development must contribute to achieving this target.

Policy D5.2

Urban design

Successful places are about people. The spaces between buildings are as important as the buildings themselves. Developments (small and large) must be based on sound and established principles of good urban design. Well-designed places create a strong sense of community and improve the social and emotional wellbeing of those who use it and ensure local resilience to the impacts of climate change such as flooding (from all sources), overheating and subsidence. This policy drives for the creation of inclusive, sustainable, efficient and high quality design and layout of the urban and suburban environment found in Merton.

To achieve this development should:

Shaping places

- a. Be of the highest standard and adhere to the most appropriate policy guidance and best practice.
- b. Ensure that urban layouts are easy to navigate and permeable to cyclists and pedestrians through recognisable streets and spaces that link in seamlessly with surrounding development and facilitate active modes of transport.
- c. That it has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces, enhances the townscape and landscape of the area and is informed by bespoke analysis of the site context, including the area's character, identity and topography.
- d. Ensure that the form and layout of new development should be street-based with clearly identifiable publicly accessible streets defined by buildings that front the street and maximise the number of entrances onto the street.
- e. Ensure that scale, height, mass, bulk and form in its site and context is appropriate and has explored its visual impact from short, mid and longer views where applicable.

- f. Provide and reinforce a clearly identifiable network of public streets and spaces that constitute the public realm, based on the creation of defensible space and natural surveillance, creating an appropriate gradation between public and private space.
- g. Proposals for changes to and enhancement of the highway and public realm shall be designed according to best practice, minimising clutter and, depending on their scale and impact, may be subject to a design review process. Proposals should include sustainable drainage measures (SUDS), urban greening features and tree planting where possible and appropriate.
- h. Be economically and socially sustainable, by offering variety and choice, and by being able to adapt to changing climatic, social, technological and economic conditions without the need for future remedial intervention.
- i. Consider the maintenance and enhancement of views, panoramas and prospects and their settings and, where appropriate, create new views.
- j. If located in town centres, high streets and other shopping areas, the development must also interact positively with the public realm by the creation of active and attractive frontages that promote natural surveillance through visibility between the street and the interior of the building and not create dead frontage through lack of windows or provision of advertising, shelves or screening which prevents easy visibility between the ground floor and the street.
- k. Positively contribute to the amenity of the designated open space or Metropolitan Open Land if applicable.
- l. Achieve high quality urban and building design from the outset and is not undermined by variations that individually or collectively devalue design quality, particularly those variations that are sought after the grant of planning permission.
- m. Consider on larger sites or locally significant sites, the benefits of temporary uses before and during construction stages.

Public Realm

- n. Ensure it is accessible, inclusive, child friendly and intergenerational. It must enable an active lifestyle by designing walkable and attractive public realm and encouraging active modes of transport.
- o. Support the council's vision for a net-zero carbon and climate-resilient future by taking a sustainable approach to design and delivery as set out in the chapter in this Local Plan on 'Climate Change'.
- p. Contribute to a safe, attractive, uncluttered, co-ordinated public realm that enhances the site's setting and connection with the surrounding neighbourhood.
- q. Prioritise pedestrians and cyclists and encourage greater walking and cycling for all around the area in accordance with Transport for London (TfL) Healthy Streets Approach.
- r. Use permeable paving, good-quality construction materials, appropriate tree planting (including shrubs) and landscape design which responds positively to the character of the area and is easy to maintain.
- s. Measures such as designing out crime, anti-terrorism, dementia friendly, green infrastructure and to help manage flood risk should be actively considered at the earliest stage of planning the public realm depending on the location, scale, and setting of the development.
- t. Consider the benefits of inclusive and diverse site specific temporary and long term public art works that enhance local character and develop a sense of place.
- u. Consider the management of the public realm to provide access needs of all of Merton's communities, including the particular needs of people with disabilities.
- v. Ensure that car parking is provided in accordance with the London Plan maximum standards and does not dominate the street or provide a barrier to walking or cycling or enjoying space safely.

Sustainable neighbourhoods

- w. Consider the orientation and form of buildings to inform their energy performance early in the design process.
- x. Mitigate the risk of flooding, subsidence, overheating and adverse impacts on the urban heat island, through appropriate design, orientation, layout, materials and use of green and blue infrastructure.
- y. Maximise the opportunity to increase green infrastructure through urban greening such as mature trees and vegetation and demonstrate that appropriate measures have been taken to protect and enhance the natural environment to strengthen the green infrastructure of the borough in accordance with the chapter in this Local Plan on 'Green and Blue Infrastructure.

Justification.

Good urban design

- 1.2.1. As recognised in Policy D3 of the London Plan, developments must take a design-led approach that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Merton's Borough Character Study provides an analysis of character borough wide and should be used to supplement bespoke site analysis.
- 1.2.2. Building places based on sound and established principles of good urban design is a fundamental element of successful place-making. It is a holistic approach to the physical arrangement of our environment. It encompasses issues of layout, land use, security, economic development, regeneration, community and social life and the general appearance and attractiveness of places. It is also key to achieving the sustainability of our environments by building places that have inherent longevity and an ability to adapt to changing circumstances inexpensively.
- 1.2.3. It is important that our urban environments are inclusive, publicly accessible, inviting and easy to understand. This is the form of most of our urban townscape and what works best. It enables places to function efficiently and adapt well to change over time. Changing poor design in the future almost always requires huge upheaval and public expense. Places that work well tend to look after themselves and adapt gradually over time.
- 1.2.4. The basis for this urban environment is the traditional street, which can accommodate all types of use in a flexible manner. This is recognised in Policy D3 of the London Plan, which states that the form and layout of a place should be street-based with clearly defined public and private environments. A street has a number of essential characteristics. It primarily has a movement function which can be adapted for use by a range of different modes; it is therefore predominantly linear in character and should be designed to indicate that it links one place to another as part of a wider network of streets.

- 1.2.5.** The design of new buildings, particularly taller buildings, on sites in close proximity to designated open spaces and MOL needs to consider the amenity, quality and use of the open space. People use open spaces for a variety of reasons including exercise, play, socialising and relaxing and the visual amenity provided by these open spaces holds a lot of public value. Development in these locations should not have an undue harm to the amenity of the open space and the council may require a Visual Impact Assessment to be undertaken and provided as part of a planning application, if deemed necessary to assess the impact.
- 1.2.6.** Sustainable design principles will help Merton achieve the target of a net-zero carbon 2050. Developments that think about sustainability early in the design process can often avoid significant and costly changes that may occur later in the process. See the chapter in this Local Plan on ‘Climate Change’ for more details.

Public realm

- 1.2.7.** A vital part of how we perceive our environment comes from the design, layout and appearance of our streets and spaces – the public realm. New, larger developments create new streets and spaces. Smaller, individual developments affect the appearance and perception of the existing public realm. Careful urban design consideration needs to be given to the impacts on the public realm by all development, from small scale safety and parking schemes to major town centre enhancement projects.
- 1.2.8.** Local streets can take on a stronger ‘place’ character. Streets are physically defined by the buildings that front them and it is therefore important that they do so in a way that reinforces their linear form. Streets are, and should be, public places. The fronts of buildings and their main access points should be directly from the street. This creates a layout that defines the street as a public place and the land further to the rear more private.
- 1.2.9.** The council will seek to improve the quality of street furniture, lighting, landscape treatments, surfacing materials and signage in the borough either as part of the development of sites or through environmental improvement schemes.

- 1.2.10.** The existence of poor public realm should be no justification for average or mediocre proposals for the public realm. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development including individual buildings, public and private spaces and wider area development schemes. Developments are expected to ensure the establishment of a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- 1.2.11.** As recognised in Policy D8 in the London Plan, the public realm can encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space.

Defensible space

- 1.2.12.** Well-designed streets feel safe if they have 'natural surveillance' and an appropriate transition from public street to private building – or 'defensible space'. Natural surveillance is created by ensuring there is an appropriate and complementary mix of uses, particularly at ground floor; by maximising the number of entrances and having clear views between the interior of non-residential buildings and the street – rather than being obscured by blinds, shutters or internal advertising.
- 1.2.13.** Defensible space is important in providing a clear buffer between public and private realm. This helps create a sense of security for residents and can deter opportunistic crime. Defensible space allows for a graduation from public and private by means of landscaped amenity or garden space. This can be effectively utilised for facilities such as bin and cycle storage. Clear boundary treatments such as hedges, walls and railings are important in providing effective defensible spaces. For residential areas natural surveillance is best created by maximising entrances and having good views from habitable rooms directly from the dwelling into the street.

Safety and security

- 1.2.14.** Well-designed places feel safe because they have built-in natural surveillance through the design of buildings and spaces, as well as having complementary mixes of uses and activities. Places that work well and look good also help engender a sense of belonging and local pride, which in itself encourages community participation and helps keep a place safe. Excessive and overt manifestations of security features often have the opposite effect.

Gated development

- 1.2.15.** An example of this is gated development which may address security concerns, however they restrict public access and therefore choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion. It is therefore likely that most types of gated developments will be contrary to this policy and are therefore discouraged by the council.

Policy D5.3

Ensuring high quality design for all developments

Whether the development is for businesses, community services or homes, all buildings in Merton must be of high quality. They must consider their impact on the environment, how people experience the development and how the development responds to its context.

All applications shall be accompanied by a Design and Access Statement (DAS) to visually demonstrate how a design has developed and to justify an applicant's design decisions.

Proposals for all development should:

Responding to context

- a. Take a design-led approach to development that responds to the sites context and character.
- b. Ensure that the proposed uses are appropriate for the site and are not located in locations that could have adverse effects on the physical and mental wellbeing of its users.
- c. Enhance local distinctiveness by responding positively to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area.
- d. Ensure that the landscape forms an integral part of any new development where appropriate.
- e. If located on a backland site, be subservient in scale, massing and bulk to its host where applicable.

People focussed

- f. Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens;

- g. Protect new and existing development from visual intrusion, noise, vibrations or pollution so that the living conditions of existing and future occupiers are not unduly diminished.
- h. Ensure the highest practical standards of access and inclusion and be accessible to people with disabilities.
- i. (where the development is new flatted development) provide an area of communal amenity space in addition to requirements for private amenity space. Site layout, privacy, overlooking and daylight/sunlight requirements should be used to determine the appropriate amount, location, shape and design of such space.
- j. Ensure that the design and management of shared spaces, such as lobbies, corridors and communal amenity, have a positive impact on physical and mental wellbeing through good quality design.
- k. In residential developments provide a minimum finished floor to ceiling height of 2.5m for at least 75% of the Gross Internal Area.
- l. In residential developments, provide a mix of tenure and unit types with at least 10% of homes that meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings' as set out in Policy H4.1.

Fit for purpose

- m. Provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.
- n. Provide outdoor amenity space, whether public, private or communal which accords with appropriate minimum standards, is efficiently laid out and is compatible with the character of surrounding areas.
- o. Meet, or exceed, the minimum space standards set out in the London Plan, or appropriate space standards, and are of functional size and proportions demonstrating efficient layouts.
- p. Ensure that the traffic and construction activity do not adversely impact or cause significant inconvenience in the day to day lives of those living and working nearby, and do not harm road safety or significantly increase traffic congestion.

- q. Where developments are houses and ground floor maisonettes/duplex units, require a garden with a minimum area of 50m² as a single useable regular shaped amenity space. Flexibility may be applied to constrained sites and higher density development where justified.
- r. Improve biodiversity levels and minimise water run-off. If providing car parking on forecourts and front gardens, applicants must maximise the amount of soft landscaping, use permeable materials and incorporate sustainable drainage measures, using a landscape-led approach to design and not be detrimental to the character of the street or highway safety.
- s. Provide well-designed cycle parking in accordance London Plan minimum standards and (higher level) and London Cycle Design Standards that is well integrated with the overall design approach of the development and does not negatively impact on the primary street elevation.
- t. Where cycle and refuse storage is located in front gardens and forecourts, storage units must demonstrate that they are of an appropriate scale and bulk and are located to minimise their visual impact on the street-scene and do not negatively impact the quality of amenity spaces.
- u. Ensure that the design and management of facilities for recycling, storage and disposal of household waste is in accordance with **Merton's Waste and Recycling Storage Requirements**, and is part of the overall design approach and does not adversely affect the primary building function, appearance of the building and character of the street.
- v. Ensure refuse facilities are convenient, allow bins to be manoeuvred easily and include sufficient capacity to accommodate increase recycling requirements. Refuse bins should not obstruct footways, so for sites with restricted access, suitable hardstanding should be provided for bins to be relocated to on collection days. The Council will support underground waste collection systems for major redevelopment schemes where proposed systems are accepted by the council's appointed waste contractor and do not compromise highway safety.

Tackling the climate emergency

- w. Incorporate sustainable design principles early in the design process to make effective use of resources and materials, and minimise water use and CO2 emissions during the construction and operation of the development as set out in **the chapter in this local plan on 'Climate Change'**.
- x. Ensure resilience to the impacts of climate change by mitigating the risk of flooding, subsidence, overheating and adverse impacts on the urban heat island, through appropriate design, orientation, layout, materials and use of green and blue infrastructure **as set out in the chapter on Green & Blue Infrastructure) in this plan**.
- y. Mitigate overheating through good design, such as orientation, shading, high albedo materials, fenestration, insulation, appropriate ventilation systems and the provision of green infrastructure.
- z. In residential developments, maximise the provision of dual aspect homes. Single aspect homes will only be accepted where they demonstrate they have adequate passive ventilation, daylight and privacy and avoid overheating and are necessary to optimise site capacity through a design led approach, in line with the London Plan.
- aa. Minimise construction waste and promote sustainable management of construction waste on-site by managing each type of waste as high up the waste hierarchy as practically possible **as set out in the policies on waste management in this plan**.
- bb. Provide appropriate energy efficient external lighting that provides safe and secure environments while not causing light pollution that adversely affects neighbouring occupiers or biodiversity.
- cc. Conserve and enhance the natural environment, particularly in relation to biodiversity, wildlife habitats and gardens **as set out in the chapter on green and blue infrastructure in this plan**.
- dd. In addition to Tree Preservation Orders, retain and protect mature trees and vegetation where applicable **as set out in the chapter on green and blue infrastructure in this plan**.

Justification.

High quality design

- 1.2.1.** London Plan guidance and Merton supplementary planning documents set out best practice design approaches to development and should be used to inform the design process.
- 1.2.2.** Well sized and proportioned rooms contribute to designing successful homes. Housing developments should consider accommodating Approved document Part M, Appendix D: Furniture Schedule in their lay-outs.
- 1.2.3.** The council will expect development to promote or reinforce local distinctiveness and encourage high quality innovative, contemporary and sustainable design. Development proposals will be welcomed that respect the character of the wider area and reinforce a “sense of place” by recognising the local distinctiveness of areas.
- 1.2.4.** What defines a site and area’s characteristics should be set out in each individual proposal by means of a bespoke analysis. This should form part of the Design and Access Statement where one is required, but a similar analysis will be required for smaller developments as well. The analysis should identify positive aspects of local character and how this will be used to inform the design of the proposal.
- 1.2.5.** Merton’s Borough Character Study, Conservation Area appraisals and Management Plans, Masterplans, site specific Local Plans and other available existing analysis should be used to inform the design of the proposal. Applications and Design and Access Statements should demonstrate how this has been done.
- 1.2.6.** Landscaping proposals can be key to knitting buildings, streets and spaces together and should be planned from the start. However, it is not a substitute for good building design and site layout. A poor design cannot be held together by attractive landscaping that does not perform an appropriate landscape function. Landscape design should support principles of good urban design such as natural surveillance, defensible space and community engagement.

Gardens and internal space standards

- 1.2.7.** The council will assess planning applications based on the London Plan to set the internal space standards for new homes, hostels, hotels and other residential accommodation. This includes the standards required for a proportion of units to be wheelchair accessible.
- 1.2.8.** For all new houses, the council will seek a minimum garden area of 50 sq.m as a single usable regular shaped amenity space. This requirement may be applied flexibly for higher density developments or constrained sites but this would have to be fully justified in the planning application. For flatted dwellings, a minimum of 5sqm of private outdoor space should be provided for 1-2 person flatted dwellings) and an extra 1 sq.m should be provided for each additional occupant.
- 1.2.9.** Meeting space standards alone does not ensure a design is high quality or fit for purpose. Regular shaped layouts are likely to be most efficient and these are the basis of minimum space standards. Irregular and awkward shaped spaces are likely to be inefficient in their use of space and may severely limit a room's usability and fitness for purpose, despite meeting or even exceeding space standards. This is made clear in the London Plan Policy D6.
- 1.2.10.** External amenity space is an important element in achieving high quality design and pleasant and attractive places to live. Policy D6 of the London Plan prescribes minimum standards for private amenity space for flats.
- 1.2.11.** External amenity space of all kinds must also be fit for purpose, have sufficient privacy, preferably be of a regular shape and receive as much as daylight and sunlight as possible. Communal amenity space provides breathing space between buildings and an opportunity for neighbours to meet and socialise.
- 1.2.12.** Proposals to park in front gardens should use [Merton's Vehicle Crossover Information Pack](#) that sets out the required measurements criteria and requirement to use permeable materials and soft landscape to provide adequate drainage.

Refuse and storage facilities

- 1.2.13.** New development must provide appropriate, well managed and easy to access storage and refuse facilities that integrate with the adjoining public realm. To help alleviate servicing concerns developers are required to provide storage and collection solutions, which are safe, attractive and well-designed and to reduce delivery and collection movements.
- 1.2.14.** Developments that face onto streets greatly contribute to the character of a place. Maximising active street frontages provide more opportunity for natural surveillance and animation facing onto the street. Bicycle, refuse and other back of house uses must consider how they address the street to positively contribute to its character.
- 1.2.1.** Refuse and bicycle stores in front gardens are becoming a popular solution to store bins and bicycles and provide easier access to bicycle use and help organise bins. It is crucial that these structures do not have a significant impact on the street scene, and as such must be located appropriately in the front garden.
- 1.2.2.** Storage structures should be designed in sensitive materials and be the minimum size necessary to reasonably accommodate bicycles and bins. They also provide an opportunity to contribute positively to biodiversity levels with the use of small green roof.
- 1.2.3.** It is difficult to modify a building post design; therefore, it is essential that this process is undertaken at an early design stage. Similarly, development should not rely on the public highway for this purpose. Where potential overspill can reasonably be anticipated the Council will introduce parking and loading controls to manage kerb space.
- 1.2.4.** With the on-going push to increase recycling rates and minimise the amount of household waste going to landfill sites, bi-weekly collection of bins and a variety of other bins, bags and boxes for recycling present households with a number of problems in accommodating these requirements. These including providing sufficient off-street storage and that bins are accessible and do not obstruct footways, especially for people with mobility or mental health problems that make it difficult to navigate obstacles, block accesses or carriageways on collection days.

- 1.2.5.** Personal safety and security are important concerns for people in the borough. It is therefore important that the design of development must take account of these requirements, by providing well designed public areas and routes and facilitating the natural surveillance of the public realm from adjacent buildings.

Lighting

- 1.2.6.** Good quality lighting at its basic level is required to provide an appropriate level of safety and security. Beyond this, lighting has a legitimate role to play as a part of landscape design and influencing the character of the public realm. Lighting can contribute towards improving the safety and security of areas. Careful consideration is needed to ensure that places and spaces are appropriately lit and there is an appropriate balance between issues of safety and security and reducing light pollution. Lighting can extend the hours of use of outdoor sporting facilities, especially in the winter months, and can be used to advertise or exhibit particular buildings, landscapes or features. Innovative lighting solutions will be encouraged that maintain a basic safety function, relate well to the function of the street and space and take into account the needs of people with different visual acuity. However, inappropriate and unnecessary lighting or lighting which is insensitively used can adversely affect amenity in terms of light pollution to neighbouring occupiers and to the night sky. When considering light proposals the council will seek ensure that unacceptable levels of illumination are controlled by conditions or that unacceptable proposals are refused planning permission.

Species, habitats and landscape

- 1.2.7.** Developments should not cause significant adverse impacts on species, habitats and landscape. Back gardens are an important element in the borough's wildlife habitat provision and biodiversity. New developments should provide for sufficient space for new planting or existing planting to grow. They should incorporate opportunities including green roofs, roof gardens, terraces, permeable surfaces, window boxes, food growing and climbing plants.

- 1.2.8.** In considering applications for development, good use of all intrinsic site features will be sought. Existing site characteristics prior to the commencement of development will be evaluated. The council will normally impose planning conditions requiring any landscape scheme to be implemented within a specified period following completion of the main building works.

Climate change

- 1.2.1.** The impacts of climate change mean that London is likely to experience more frequent and severe extreme weather events; including higher average temperatures, more prolonged spells of intensely hot weather and higher seasonal and extreme rainfall.
- 1.2.2.** In line with other policies in this plan, applicants will need to demonstrate how their development proposal makes effective use of resources and materials, and minimises water use and CO2 emissions. This is most effectively and efficiently done by considering these matters at the start of the design process. Considering these issues at the end of the design process can result in unnecessary technological solutions being added to buildings that cost more and do not make most effective use of resources.
- 1.2.3.** The management of waste on construction sites can save costs and result in waste being treated in the most sustainable manner, thereby contributing to the development's attainment of the applicable sustainable design and construction standard and promoting a circular economy.
- 1.2.4.** Dual aspect homes with opening windows on at least two sides have many benefits that can add to the development's success. These include better access to daylight with greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation and more views out.

- 1.2.5.** Single aspect homes are acceptable where they are required to optimise site capacity in a well-designed scheme and where they are laid out and designed to allow for good passive ventilation, daylight, privacy and to avoid overheating. Poorly located, designed and laid out single aspect homes are more likely to overheat as they are more difficult to ventilate, creating undesirable living conditions that can have adverse impacts on health and wellbeing.

Overheating

- 1.2.6.** 20% of homes in England currently overheat even in cool summers and annual UK heat-related mortality is projected to increase from a current baseline of 2,000 heat-related deaths per year to 5,000 per year by 2050. Within London, the challenges of overheating are intensified by the urban heat island effect – caused by the absorption and retention of heat in built-up urban areas.
- 1.2.7.** With our predicted population, the council therefore requires all development to demonstrate that the risk of overheating has been mitigated in any proposed buildings, and to incorporate green infrastructure in line with **Policy O8.6 Urban Greening (in the Chapter on Green & Blue Infrastructure)** to help mitigate the urban heat island effect.
- 1.2.8.** Development must prioritise passive design measures to promote cooling (e.g. design, layout, fenestration and orientation) ahead of active forms of ventilation (e.g. air conditioning) so as to limit intensive energy use and waste heat production. However, passive ventilation strategies cannot be considered in isolation of potentially negative external factors such as air quality, security or noise. Energy strategies that rely on passive ventilation must clearly demonstrate that occupants will not be adversely affected by air and noise pollution, or security risks, during periods of warmer weather. Any proposals to use Mechanical Ventilation with Heat Recovery (MVHR) should include summer bypass modes so that heat is not recirculated during warmer months.
- 1.2.9.** Single aspect dwellings can be more difficult to ventilate naturally and may be more likely to overheat. Any single aspect home must be located, laid out and designed to have adequate passive ventilation, daylight and privacy, and avoid overheating without reliance on energy intensive mechanical cooling systems.

Subsidence

- 1.2.10.** Prolonged periods of hot and dry weather and prolonged periods of rainfall, have the potential to result in ground movement which in turn can lead to subsidence. This is due to increased shrinking and expanding of the cohesive London Clay soils which are found in the borough.

- 1.2.11.** All development should look to mitigate and reduce the risk of subsidence through building siting, orientation, proximity to natural hazards such as water courses and mature vegetation. The impacts of climate change mean that London is likely to experience more frequent and severe extreme weather events; including higher average temperatures, more prolonged spells of intensely hot weather and higher seasonal and extreme rainfall.
- 1.2.12.** On sites where ground has a high risk of susceptibility to movement, and if the choice of location for the development is limited, then appropriate structural foundation options should be considered to mitigate against the risk of subsidence. All development should ensure that appropriate projections for temperature changes are considered for the full design life of any proposed buildings and that the risk of future subsidence is mitigated through best practice foundation design, considering the potential for ground movement.
- 1.2.13.** Where tree planting is proposed, species selection and location should be carefully considered to mitigate the risk of subsidence.

Policy D5.4

Most of the development that takes place in Merton is alterations and extensions to existing buildings. This policy ensures that inclusive, sustainable, efficient and high quality design is also maintained for existing building across the urban and suburban environment found in Merton.

Alterations and extensions to existing buildings

To achieve high quality design and protection of amenity within the borough.

Alterations or extensions to buildings will be expected to meet the following criteria:

- a. Be of high quality design that responds to the character of the neighbourhood.
- b. Respect and complement the design and detailing of the original building.
- c. Respect the form, scale, bulk, and proportions of the original building.
- d. Use robust external materials that will be appropriate to the original building and to its surroundings.
- e. Respect space between buildings where the rhythm contributes to the character of the area and to avoid long conjoined facades.
- f. Complement the character and appearance of the wider setting;
- g. Ensure that noise, vibrations or visual disturbance resulting from the development do not diminish the living conditions of existing and future residents;
- h. Where the proposal incorporates a new or altered roof profile, ensure that materials are sympathetic to the original building and the surrounding area;
- i. Seek to minimise carbon emissions from existing buildings in accordance with [the chapter in this Local Plan on climate change.](#)
- j. Ensure proposals for dormer windows are of a size and design that respect the character and proportions of the original building and surrounding context, do not dominate the

existing roof profile and are sited away from prominent roof pitches, unless they are a specific feature of the area;

- k.** Ensure that roof forms and materials are of an appropriate size, type, form and material for the existing building, such that they are not unduly dominant, and respect the prevailing positive characteristics of the area.
- l.** Demonstrate that the proposal does not significantly impact the quality of neighbouring buildings and amenity through overshadowing and overlooking.
- m.** Seek to improve levels of biodiversity through interventions such as green roofs, sustainable drainage or soft landscape.
- n.** Ensure that there is no increase in risk of flooding to surrounding area, either due to displacement of floodwater or diversion of flood flowpaths.

Justification

Well-designed buildings

- 1.2.14.** Well-designed buildings make an important contribution to the character and quality of an area. Extensions must be as well designed and architecturally competent as new buildings. Whether visible from the street or not, all extensions should be of a high quality design. Generally, extensions to be sited to the rear of the building and have a minimal impact on the street scene. Side extensions and those on street corners which will be visible must exhibit particular care in their design and how they relate to both the host building and the street scene. High quality contemporary extensions in a contrasting architectural style to the original may in some cases be appropriate. The council will welcome these on a case by case basis. They must be of the highest architectural quality and thoroughly reasoned in relation to the host property and immediate context
- 1.2.15.** The council's Borough Character Study, Conservation Area Character Appraisals guide applicants. The borough has a few examples of high quality contemporary infill
- 1.2.16.** Development and wishes to promote this further in the right context. It will therefore encourage new extensions to be contemporary in form where the architectural quality is exceptional and the building and context can sustain this without having a negative impact on the host building or adversely affecting a positive prevailing street character.

Design and Access Statements

- 1.2.17.** Development proposals should be based on an assessment of character and recognise the local distinctiveness of areas and emphasise a positive local sense of place. Planning applications shall be accompanied by a Design and Access Statement (DAS) to demonstrate how the design has been arrived at.

Policy D5.5

Merton has a wealth of heritage assets including conservation areas, listed buildings and structures and scheduled ancient monuments. This policy aims to conserve and enhance Merton's heritage assets, their settings and distinctive character.

Managing heritage assets

- a. Development proposals affecting a heritage asset or its setting will be required to be in accordance with the following criteria:
 - i. Principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, the London Plan, and Historic England guidance;
 - ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.
- b. All development proposals associated with the borough's heritage assets or their setting will be expected to demonstrate, within a Heritage Statement, how the proposal conserves, and where appropriate enhances the significance of the asset in terms of its individual architectural or historic interest and its setting.
- c. In accordance with the NPPF, any alteration or destruction of a heritage asset, or development that has an impact on the setting of a heritage asset will require clear and convincing justification. Substantial harm or loss of:
 - i. Grade II listed buildings or registered parks or gardens, should be exceptional
 - ii. Assets of the highest significance, grade I and II* listed buildings or registered parks and gardens should be wholly exceptional.
- d. Proposals that will lead to substantial harm to the significance of, or the total loss of heritage assets will only be granted in exceptional circumstances where substantial public benefits outweigh the harm or loss in accordance with the NPPF or that all of the following apply:

- i. the nature of the heritage asset prevents all reasonable uses of the site;
 - ii. no viable use of the heritage asset itself can be found that will enable its conservation;
and,
 - iii. conservation by grant funding or some form of charitable or public ownership is not possible; and,
 - iv. the harm or loss is substantially outweighed by the benefit of bringing the site back into use.
- e. The loss of a building that makes a positive contribution to a conservation area or heritage site should also be treated as substantial harm to a heritage asset.
- f. Proposals affecting a heritage asset or its setting should conserve and enhance the significance of the asset as well as its surroundings and have regard to the following:
- i. The conservation, or reinstatement if lost, of features that contribute to the asset or its setting. This may include original chimneys, windows and doors, boundary treatments and garden layouts, roof coverings or shop fronts. In listed buildings, internal features such as fireplaces, panelling, ceilings, doors and architraves as well as the proportion of individual rooms may also be of significance.
 - ii. The removal of harmful alterations such as inappropriate additions, non-original windows and doors and the removal of paint or pebbledash from brickwork.
 - iii. Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the heritage asset will not be taken into account in any decision.
- g. Proposals to existing heritage asset buildings should seek to improve the proposals energy efficiency effectively and sensitively and without detrimental visual impact on the heritage asset, or setting of the heritage asset.

Justification

- 1.2.1. The London Plan is clear that heritage assets should be seen as an integral part of the urban fabric with a key role in place-making and contributing to economic viability, accessibility, environmental quality and social well-being.
- 1.2.2. Heritage significance should be used positively in the planning and design process and heritage assets should be sensitively integrated with their setting with creative and innovative solutions that contribute to their significance and sense of place. The council will pay particular attention to assets on the 'at risk' register and actively seek to find viable and long-term sustainable uses that enable them to be removed from the list.

Heritage assets

- 1.2.3. Merton has a rich and varied heritage ranging from designated heritage assets of national importance (such as the remains of Merton Priory founded in 1117, a scheduled ancient monument) to the suburban heritage of the 1930's. The council has a duty to consider the significance of all these areas that are positively identified as having heritage significance when carrying out its statutory functions and through the planning system. Conservation and enhancement of heritage assets, and where appropriate, associated development, can contribute towards reinforcing local distinctiveness and character in the borough.
- 1.2.4. Heritage assets are the valued components of the historic environment. They are defined as any building, site, place, area or landscape, positively identified as having a degree of significance meriting consideration in planning decisions. The term embraces all manner of features, whether standing, buried or submerged, whether designated or not and whether or not they are capable of designation.

Identification of heritage assets

- 1.2.5.** The identification of a heritage asset could be through a range of means. This could include formal designation such as conservation area or listed, or locally listed building status. Buildings in a conservation area identified as having a positive contribution to its character will be considered as undesignated heritage assets in their own right. Heritage assets may also be identified the borough character study or during the development control process itself.

Types of heritage assets

- 1.2.6.** Heritage assets (HA) covered by this policy include:

Listed buildings (designated HA)

Locally listed buildings (undesignated HA)

Buildings in conservation areas (designated HA)

Historic parks and gardens (designated HA)

Local Historic Parks and Gardens (undesignated HA)

Scheduled ancient monuments (designated HA)

Archaeological Priority Areas (designated HA)

Any other building, monument, site, area, streetscape or landscape that is positively identified as having a degree of heritage or historic significance

Heritage statements

- 1.2.7.** Heritage statements will be required to set out how proposals conserve, enhance or restore heritage assets and where appropriate, conservation management plans should be prepared for the future maintenance and management of the asset. Special attention should be paid to the conservation or reinstatement of individual details of the asset that contribute towards its particular character, for example; chimneys, windows, doors, roof covering, boundary treatments and the individual elements of shop fronts. The loss or alteration of individual features can cause substantial harm to the significance of heritage assets.
- 1.2.8.** The level of detail provided in the heritage statement should be proportionate to the asset's importance in terms of the significance of the asset affected and the impact of the proposal. Where the proposal has a substantial impact on the significance of a heritage asset, it should be carried out by a specialist historic environment consultant.
- 1.2.9.** Where the Heritage Statement identifies the potential of archaeological remains within an archaeological priority area, an Archaeological Evaluation Report (and where necessary a field evaluation) will also be required.
- 1.2.10.** All development affecting heritage assets or their setting will need to be in accordance with the detailed guidance set out in the Historic Environment Planning Practice Guide. The guidance covers issues such as recording of information relating to heritage assets, guidance on repairs and restoration, change of use and improving energy performance etc.
- 1.2.11.** Historic England, keeps and maintains a Heritage at Risk register developers are encouraged to check the register at the earliest stage of development and for Heritage Statements.

Environmental performance of heritage assets.

Proposals to existing heritage asset buildings should seek to improve the proposal's energy efficiency effectively and sensitively and without detrimental visual impact on the heritage asset, or setting of the heritage asset.

- 1.2.12.** As set out in Merton's Climate Strategy & Action Plan (2020), retrofitting the c86,000 homes and other buildings in Merton will be essential to enable Merton to reach net-zero carbon by 2050; and some of these buildings will be or will be located within heritage assets.
- 1.2.13.** In the past there has been tension between the requirements to improve the energy performance and reduce carbon from buildings that are or that are located within heritage assets and the need to conserve these historic assets. The council is supportive of efforts to tackle the climate emergency and will positively consider proposals for retrofitting buildings that are themselves or within heritage assets, where these proposals do not cause substantial harm to the heritage assets.

Information on heritage assets

- 1.2.14.** Details of the borough's heritage assets including conservation areas (design guidance, appraisals and management plans) as well as details of listed and locally listed buildings, Registered Parks and Gardens and Scheduled Ancient Monuments are available on the council's website: www.merton.gov.uk/planning-and-buildings/conservation-heritage

Policy D5.6

Tall buildings

Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan.

In the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and sense of place. They can act as visual markers, such as the redeveloped Britannia Point in Colliers Wood, provide architectural variety, such as Glebe Court in Mitcham, and optimise a sites potential for homes and jobs such as the future of High Path in South Wimbledon. It is crucial that tall buildings are of the highest quality of design and construction.

Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case.

The council will generally support tall buildings where:

- a. Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine local character and heritage assets and their settings through townscape analysis of short, mid and long views.
- b. They enhance the setting and/or relationship with neighbouring heritage assets.
- c. They are of exceptional design and architectural quality.
- d. They are informed by the most up to date and relevant council supplementary planning documents Guidance, policy and site allocations.
- e. They respond to the council's Design Review Panel, where applicable, which provides independent design scrutiny from a panel of industry experts.

- f. They ensure the ground and lower levels are designed for a human scale and maximise the amount of active frontage and natural surveillance.
- g. They do not impact the opportunities of neighbouring or adjoining sites, including across borough boundaries.
- h. They are designed to mitigate against any micro climatic effects such as sun, reflection and wind, and internal spaces are designed to mitigate overheating.
- i. They create minimal harm to the quality of neighbouring public spaces and open spaces.
- j. They include high quality and useable public open space, appropriate in size and location to the building and its site characteristics.
- k. They're an appropriate material pallet that is well detailed and safe is proposed.
- l. They provide a mix of tenure and home sizes in accordance with [Chapter X 'Housing'](#)
- m. They Incorporate mitigation measures to help prevent suicide and accidental falls for example anti-climb methods, fences, barriers and rails, these will be well designed and should be integrated into the overall design of the building.
- n. Appropriate provision for waste and bicycle storage is provided and is integrated into the overall design of the building.
- o. Their shared spaces, such as lobbies, communal gardens and corridors are designed to enhance social cohesion and mental and physical wellbeing
- p. They're within Wimbledon town centre, as set out in the FutureWimbledon supplementary planning document,
- q. They're within Morden, as set out within the Morden town centre policy and site allocation Mo4.
- r. They're within Colliers Wood, as set out within the site allocation CW2.

Development proposals for tall buildings should be supported by:

- s. A detailed townscape analysis that includes short, mid and long views and analysis of its impact on the setting of heritage assets such as parks or buildings.
- t. A digital 3D model in agreement with the council that can be used to evaluate its visual impact across the borough and beyond.

Justification.

- 1.2.15.** Tall buildings can form part of a masterplan approach to help manage future growth and regeneration opportunities by contributing to new homes and economic growth.
- 1.2.16.** Tall and high density buildings can offer a range of benefits. For example, they can reduce the carbon footprint per dwelling by using district energy systems; they can help people live closer to local centres, reducing sprawl and retaining vital open land. When situated close to transport links, such buildings can reduce the reliance on cars and encourage healthier ways of getting around.
- 1.2.17.** Tall buildings can also improve wayfinding and add to the visual intricacy of neighbourhoods. However, perhaps more than any other housing typology, tall buildings must balance the needs of individual homes with broader townscape considerations.
- 1.2.18.** Exemplary tall buildings located in the right place can make positive contributions to Merton's townscape. However, if poorly designed and located inappropriately they can have a negative functional, environmental and visual impact and as such tall buildings will undergo a high level of design scrutiny.
- 1.2.19.** Merton's Borough Character Study gives a holistic guidance on best practice design approach highlighting the importance of a sites suitability and sensitivity.
- 1.2.20.** Not all tall buildings need to be iconic landmarks. If tall buildings form a cluster or in close proximity to others, they should not compete and their composition must be considered.
- 1.2.21.** Applicants should be prepared to provide 3D digital models to analyse how their tall buildings are placed within the context of the borough and beyond, assessing cumulative impacts of both existing and permitted, but not yet completed, schemes.

Policy D5.7

Policies on advertisements, shopfront design and signage aim to ensure these regular features of our urban environment enhance and do not detract from people's experience of the public realm in Merton.

Advertisements

- a. Express consent will only be granted for advertisements where they do not harm the character of an area, amenity or public safety. When assessing proposals for new advertisements, cumulative impacts will be taken into account.
- b. The council will ensure that:
 - i. The quality, character and amenity of the borough is not diluted or undermined by inappropriate or excessive advertising on buildings, in the street or on shop-fronts.
 - ii. Advertisements and signage should be designed so that their size, scale, type and illumination are unobtrusive, taking into account site context and local character.
 - iii. They do not compromise safety and security or obscure highway sightlines and allow free movement along the public highway by all users, including people with disabilities, especially the visually impaired.
 - iv. They do not adversely impact on trees on or in close proximity to the proposed site, especially those protected by Tree Protection Orders (TPOs) or within conservation areas.
 - v. Visual permeability and natural surveillance between the street and inside non-residential buildings is not compromised by internally applied artwork, blinds or advertising.

Justification

1.2.22. Advertisements are a regular feature of our urban environment and, when well-designed and located sensitively, can play a positive role in creating a vibrant and interesting place. However, it is important that advertising material (including advertisements that may be considered individually acceptable) does not proliferate to an extent to undermine the appearance of individual buildings, the street or the wider public realm. The council will be vigilant in using its powers to prevent such an excess. When assessing the impact of an advertisement proposal, the cumulative impacts of advertisements on the streetscape and public realm will be taken into account.

Safety and security

1.2.23. Advertisements should not represent a safety or security hazard to pedestrians or motorists by impeding views, unduly distracting attention, creating opportunities for concealment or otherwise undermining perceptions of safety.

1.2.24. The erection of advertisements can block views and vistas along streets – important for orientation and understanding the public realm - or deflect attention inappropriately from the general townscape or important local landmarks, local established views and historic buildings and areas. Potential losses of views will be taken into consideration when determining applications. Inappropriately designed, sized or sited advertisements can detract from the visual appearance of individual buildings and the wider townscape. This can be the case in any part of the borough, but particularly sensitive are Conservation Areas, Metropolitan Open Land or the vicinity of Listed Buildings. The council will use its Discontinuance Notice Powers to remove advertisements that substantially injure local amenity and the environment.

Policy D5.8

This policy aims to ensure digital infrastructure is deployed to support better digital connectivity across all of Merton and does not detract from a healthy environment or people's experience of the public realm.

Digital infrastructure

- a. Proposals for telecommunications apparatus and equipment will be considered in accordance with International Commission guidelines and relevant Government guidance. Proposals should demonstrate that the equipment will not cause interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.
- b. Proposals will be expected to demonstrate that the equipment will meet International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines on the limitation of exposure of the general public to electromagnetic fields.
- c. Proposals for telecommunications apparatus and equipment should be designed and located such that they do not detract from the visual quality, enjoyment and useability of the public realm or detract from the setting and context of buildings and the street scene. Proposals will be expected to:
 - i. Ensure equipment is placed to the back edge of the footway;
 - ii. Maintain an adequate width of footway consistent with its existing and likely future intensity of use;
 - iii. Group equipment in a neat and orderly fashion;
 - iv. Ensure there is not a proliferation of numerous items of infrastructure that will cumulatively adversely be detrimental to the public realm;
 - v. Construct bespoke enclosures to accommodate equipment as a means of managing the need to provide a number of items of equipment in a single location;

- vi. In particularly sensitive areas, notably where heritage assets are affected, locate equipment in underground chambers.
- vii. Ensure that the design and siting of equipment and infrastructure does not undermine the safe enjoyment of the public realm or relevant policies promoting active travel and sustainable means of travel.

Justification

- 1.2.25. The council recognises the benefits of up-to-date digital infrastructure industry and the needs of telecommunications companies in providing and maintaining this. This needs to be balanced with minimising the environmental impact and ensuring a high quality urban environment.
- 1.2.26. The council is therefore keen to minimise the adverse impacts on visual and environmental amenity and public safety of proposals for telecommunications, particularly in residential areas, on sensitive skylines and in other sensitive locations. Telecommunications apparatus should be sited unobtrusively and the council will have regard to all relevant development plan policies in assessment of development proposals for this apparatus.

Policy D5.9

Policies on advertisements, shopfront design and signage aim to ensure these regular features of our urban environment enhance and do not detract from people's experience of the public realm in Merton.

Shop front design and signage

- a. Proposals for new shop fronts or alteration to existing shop fronts should relate to the scale and character of the building and enhance the street scene. Proposals for alteration or removal of existing shop fronts shall:
 - i. Retain and restore quality original shop fronts where they exist, to contribute to and enhance the established character of their shopping centre or parade;
 - ii. Retain and restore original features and details where they are of historic value, contribute to the character or appearance of the building or street scene;
 - iii. Retain separate access to upper floors and create or restore such access where this is practical;
 - iv. Provide for satisfactory access for people with disabilities, special sensory and mobility needs within the building, retaining the full width of the effective footway, irrespective of ownership, keeping it free of ramps, railings or any other obstructions.
- b. Proposals for shop fascias will be expected to enhance the street scene and form an integral and appropriately proportioned part of the whole shop-front and building. They should:
 - i. Relate to the appearance, scale and character of the shop front and its associated features;
 - ii. Relate to the shopping parade within which it is located;
 - iii. Ensure the depth of fascias are consistent with neighbouring shops where they were designed as a whole and relate appropriately to the pilasters and console brackets;

- iv. Ensure pilasters and console brackets are designed as a unifying element to a group of shops and form a consistent design and paint colour.
- c. Signage design and lighting should be of a high quality, relating well to the original building and the business of the shopfront. In order to achieve this:
 - i. Illumination should be subtle and avoid plain, internally or box-lit fascias or lettering;
 - ii. Signs should be applied to an original fascia board and not be overlaid onto earlier signs;
 - i. Projecting signs should be of a scale and size that is proportionate to the size and depth of the main fascia;
 - ii. Projecting signs should be attached to one end of the main fascia and not between shops on the pilaster, console bracket or above it on the upper floor elevation.
- d. Proposals for shop-fronts should strike the right balance between security and a positive interface and relationship with the street. They must ensure there is visual permeability and natural surveillance between the street and inside the building, whatever their use. To this end:
 - i. Proposals for security shutters will only be allowed if a legitimate security need for them is identified;
 - ii. Where security shutters are considered necessary, they must be installed on the inside of the shopfront and allow clear views into the shop – solid or near solid shutters will not be permitted and no type of security shutters will be permitted on the outside of a shop-front;
 - iii. Artwork, glass frosting, blinds or any internally applied advertising or screening will only be permitted where they do not detract from visual permeability and natural surveillance between the street and inside the building
- e. Shop-fronts must be of a high quality and well-proportioned and designed and should be designed in accordance with the council's Shopfront Supplementary Planning Document 2017.

- f. Proposals for new buildings where there is a proposed retail or non-residential ground floor, must demonstrate that future shop-fronts and advertising has been planned for, and can be accommodated in the building design in a manner that does not undermine the building design and architectural integrity.

Justification

- 1.2.27. Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops.
- 1.2.28. The council recognises the importance of attractive, high quality shop-fronts in well maintained buildings in enhancing the quality of the retail and business offer in the borough's town and local centres. As a result, the council is embarking on a selective programme of shop-front enhancements and façade restorations in order to address this issue.
- 1.2.29. Outside these areas the council has produced a Supplementary Planning Document on shop-fronts to guide applicants planning to install new shop- fronts. Applications should show that they have used this guide to inform the

Policy D5.10

This policy will ensure that dwelling conversions are of high quality standard for future occupiers and support housing choice

Dwelling Conversions

- a. Proposals to convert an existing single family sized (3-bed or more) dwelling into two or more smaller units of accommodation must incorporate the re- provision of at least one family sized (3-bed or more) dwelling.
- b. Seek to minimise carbon emissions from existing buildings in accordance with the cvhapter in this Local Plan on climate change.
- c. In accordance with Policy F13.9 Managing Local Flooding, dwelling conversions in Flood Zone 3b must ensure no increase in building footprint and no increase in the number of units or bedrooms. Proposals for the change of use or conversion to a use with a higher vulnerability will not be allowed. In Flood Zone 3a, self-contained residential basements and bedrooms at basement level are not permitted.

Justification

- 1.2.30.** Local housing research demonstrates the need for all sizes of new homes in Merton, including family housing.
- 1.2.31.** The conversion of existing single homes into two or more smaller dwellings contributes to the provision of Merton's share of London's new homes. Whilst this does not normally create problems with larger houses, the conversion of single dwellings into two or more smaller homes is also prevalent in certain parts of Merton, the "gridiron" terraces of Abbey, Colliers Wood, Dundonald, Graveney, Hillside Trinity and Wimbledon Park. Loss of 3-bed+ homes in these locations reduces housing choice in these areas.
- 1.2.32.** To ensure that dwelling conversions produce new homes of a high design quality and support housing choice, all new dwellings including dwelling conversions must comply with the most appropriate minimum space standards in place at the time of the planning application. Applications for the conversion of existing family-sized single dwellings into two or more smaller units must include the re-provision of one family sized unit. As set out in London Plan 2021 paragraph 4.2.8, a family sized unit is defined as having three or more bedrooms.
- 1.2.33.** To ensure negative effects are mitigated, the council will expect any proposed conversions to retain a family sized dwelling where one previously existed. All dwelling conversions, regardless of size must rigorously apply the spaces standards in Policy D6 in the London Plan. This will ensure conversions do not take place in unsuitable dwellings that are too small, cannot provide adequate circulation and are in any other way considered sub-standard.
- 1.2.34.** In line with the London Plan, homes located on the ground floor in dwelling conversions and other forms of minor residential development should meet the requirements of Policy D7 Accessible Housing. Homes that are not on the ground floor on minor developments can comply with the M4(1) standard, which does not require step-free access, where provision of step-free access would be unfeasible

- 1.2.35.** Often many larger (and some smaller) houses have been subdivided into self-contained flats and/or houses in multiple occupation in the past, when today's space standards did not apply. These are likely to be considered sub-standard in terms of space, circulation, access and provision for people with disabilities. Conversion, reconfiguration and extension of such properties can improve the quality of housing stock and bring it up to modern standards.
- 1.2.36.** Conversions should take account of **Policy F13.9 Managing Local Flooding**, to ensure that people and property are not placed at increased risk of flooding from all sources.

Policy D5.11

The Council will only permit basement and subterranean developments that do not cause harm to the built and natural environment, local amenity and does not result in increasing flooding (from all sources including surface water flooding) or ground instability issues. Guidance on delivering this policy can be found in [Merton's basement and subterranean development supplementary planning document](https://www.merton.gov.uk/Documents/yes_basement_andsubterranean_planing_guidance_2017.pdf)

https://www.merton.gov.uk/Documents/yes_basement_andsubterranean_planing_guidance_2017.pdf .

Basements and subterranean design

- a. All basement or subterranean development applications must be accompanied by
 - i. A Basement Impact Assessment
 - ii. A Drainage Strategy.
 - iii. An outline Construction Method Statement. The CMS is required to demonstrate that the development will be designed and constructed, to minimise its impact on the environment and neighbouring sites during construction
 - iv. Construction Traffic Management Plan to ensure that traffic and construction activity does not cause any unacceptable harm to pedestrian, cyclist, and vehicular and road safety.
- b. The development must not result in an unacceptable impact on the amenity of adjoining properties, on the natural and historic environment during and post construction.
- c. Where a basement or subterranean development is added to, or adjacent to, a listed building and all other heritage assets, it must safeguard all significant archaeological deposits and, in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance.
- d. Proposal must not cause loss, damage or adverse impact to trees, shrubs, biodiversity, nature and amenity value.

- e. All basements or subterranean developments must not comprise of more than one storey and not extend beyond the outer walls of the original property (prior to alterations) to more than 50% of the original dwelling's footprint.
- f. All basements or subterranean must be appropriate to its setting and designed, have regard to the health and well-being of its occupants, provide access to natural light and ventilation.
- g. Ensure that any externally visible elements such as light wells, roof lights and fire escapes are sensitively designed and sited to avoid any harmful visual impact on neighbour or visual amenity.
- h. Basements or subterranean development must be designed to minimise the risk of internal flooding and must not increase the risk of flooding elsewhere. Proposals must include sustainable urban drainage scheme to reduce runoff rates and implement proposals to conserve and re-use water through rainwater harvesting.
- i. Developers of basement or subterranean developments are required to sign up to Considerate Constructors Scheme.
- j. No new basements or subterranean development will be permitted under the public highway.

Justification

- 1.2.37.** This policy applies to all new basement or subterranean developments, including the construction or extension below the prevailing ground level of a site or property. Subterranean and other basement developments are 'development' as defined by the Town and Country Planning Act 1990 as amended. This policy focuses on the design element of basement developments.
- 1.2.38.** Basement and subterranean developments can help to make efficient use of the borough's limited developable land. However, in some cases they may have the potential to cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems or damage the character of areas and the natural environment. Therefore, limiting the size and extent of a basement will ensure that the special character of Merton is preserved and importantly, proposals do not lead to over development or inappropriate intensification of existing properties.
- 1.2.39.** Basement and subterranean developments affect the existing building, neighbouring building and neighbourhood amenities. Building Regulations and the Party Wall Act control the structural integrity of the development itself, but these regulations do not concern themselves with the impact on neighbourhood amenity of the construction process or the finished development.
- 1.2.40.** In some cases of higher potential risk, the Council may require applicants to fund an independent assessment of the basement structural assessments. This is particularly likely where proposals will affect listed buildings of high significance or with particularly sensitive historic fabric, or those in high risk locations where basements are in proximity of environmentally sensitive features, such as culverted rivers/watercourses.

Basement and subterranean Supplementary Planning Document (SPD) and the Sustainable Drainage (SUDS) SPD.

- 1.2.41.** Merton's Basement and subterranean Supplementary Planning Document and the Sustainable Drainage (SUDS) SPDs provide further guidance on the Council's requirements for additional assessments to be submitted with a basement/subterranean planning application. Both supplementary planning documents can be found online via Merton council's website www.merton.gov.uk/planning-and-buildings/planning/supplementary-planning-documents

Construction Method Statement (CMS)

- 1.2.42.** The impact of basement and subterranean construction, including issues relating to noise, dust, disturbance and structural stability of surrounding properties as well as the management of traffic, plant and equipment, is a growing concern in the borough, particularly in residential streets. It can affect the quality of life, amenity and living conditions as well as traffic and parking of nearby residents and local communities. In some instances, multiple excavations in a residential street can lead to detrimental impacts during the excavation and construction processes. While planning has limited powers to control the construction processes, it does have an important role in protecting amenity and living conditions.
- 1.2.43.** The council will seek to ensure that the amenity, living conditions and the health and wellbeing of nearby residents are protected by reducing the impacts from construction works, such as noise, vibration, soil removal and associated plant, machinery and heavy vehicles. In addition to ensure that structural stability is safeguarded at each of the development proposal, planning applications for basement developments must demonstrate how all construction work will be carried out. Guidance on CMS can be found in Merton's Basement and subterranean SPD.

Sustainability

- 1.2.44.** The environmental impact of basement and subterranean developments is arguably greater than the equivalent above ground development due to the increased energy and resource requirements in their construction and use (e.g. heating and lighting). The council will expect all basement development proposals to demonstrate that they have sought to minimise their environmental impact in accordance sustainable design and construction and circular economy policies.

Heritage Assets, Conservation and Listed buildings

- 1.2.45.** The impact of basement and subterranean development proposals on heritage assets must be assessed on their merits to avoid any harm to their significance or historic integrity. Listed buildings are recognised for their exceptional heritage value and once a listed building is severely damaged or demolished, that historical connection is lost forever. Basements beneath the garden of a listed building are not permitted except on larger sites where the harm to the building's structure or setting and the basement is substantially separate from the listed building, and the acceptability of such schemes will be assessed on a case by case basis.
- 1.2.46.** The link between the listed building and the basement should be discreet and of an appropriate design and location that does not adversely impact on the significance of the listed building. In the exceptional circumstances where these are allowed, there should be no extensive modification to the foundations of the listed building or any destabilisation of the listed structure and account will be taken to the individual features of the building and its special interest.
- 1.2.47.** Similarly, development proposals involving excavation nearby or adjacent to a listed building will be required to demonstrate that the integrity of the listed building will be unaffected. The council will consult with Historic England (this includes the Greater London Archaeology Advisory Service (GLAAS) and any other appropriate bodies regarding listed building developments

1.2.48. In conservation areas, basements should conserve or enhance the character and appearance of the conservation area. This is particularly relevant in relation to external visible features e.g. light wells and railings which may impact on the character of conservation areas. Further guidance and advice can be found in Merton's Basement and Subterranean, Design and Sustainable Drainage SPDs.



06. HOUSING

Policy No. H4.1

Housing choice

To ensure that Merton's existing and future residents have a choice of different types, sizes and costs of homes.

We will:

- a. Require proposals for new homes including new build schemes and redevelopment proposals to be well designed and located to create socially mixed, inclusive and sustainable neighbourhoods.
- b. Seek the provision of a mix of housing types sizes and tenures at a local level to meet the needs of all sectors of the community and at all stages of people's lives. This includes the provision of family sized and smaller homes and provision for those unable to compete financially in the housing market sector and those with special needs.
- c. Incorporate the re-provision of at least one family sized home where the loss of an existing family sized home is proposed.
- d. In accordance with London Plan Policy D7 (Accessible housing) and Building Regulation Requirement M4(2), 90% of all new build housing is required to be 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings.
- e. Aim for the strategic target of 50% of new homes built in Merton between 2021-2036 to be affordable.
- f. We will expect the following level of affordable housing (gross) to be provided on individual sites as follows:

Threshold (gross)	Affordable housing level	Affordable housing tenure split	Required provision.
10 or more homes	<p>¹Threshold level to be eligible for the Fast-Track Route as set out in the London Plan provided all provision is on-site without public subsidy:</p> <p>50% for public sector land or on industrial land where redevelopment would result in a loss of industrial capacity.</p> <p>For all other sites up to 50% with a minimum provision of 35%.</p>	<p>70% Low-cost rent</p> <p>30% Intermediate</p>	<p>On-Site</p> <p>Only in exceptional circumstances will the provision of affordable housing off-site or financial contribution in lieu of provision on-site be considered by the council, and this must be justified and such schemes will be required to provide a detailed viability assessment.</p>
2 – 9 homes	<p>Financial contribution equivalent to 20% affordable housing provision.</p>	<p>70% Low-cost rent</p> <p>30% Intermediate</p>	<p>Financial contribution</p>

- g. Demonstrate that they have taken account of the strategic 50% target and have sought grant where required to increase the level of affordable housing beyond 35%.
- h. Applicants should present data for all housing tenures proposed in their scheme as a percentage of total residential provision in three ways: as the number of homes (units), habitable rooms, and floorspace.
- i. For schemes of 10 homes and above, affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and the Mayor’s Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these.

- j. All affordable housing provided by the scheme must be affordable in perpetuity and secured via planning obligation (Section 106 agreement or appropriate legal deed).

¹ In the London Plan the 35 per cent threshold level will be monitored and reviewed in 2021 to determine whether this threshold should be increased and proposals will need to have regard to this.

Justification

Access to decent homes

- 4.1.1.** National and regional guidance acknowledged that being able to access decent affordable accommodation is a major factor in improving health and wellbeing (including mental health). Accommodation standards and affordability have a strong influence on other issues which contribute to quality of life, including health (including mental health) and wellbeing, crime, education and skills. Merton's Strategic Housing Needs assessment (SHNA) (July 2019), identified a notable and pressing need for affordable homes.
- 4.1.2.** There are marked differences in quality of life between different communities within Merton. The wards in the east of the borough (Abbey, Colliers Wood, Cricket Green, Figges Marsh, Lavender Fields, Pollards Hill and St Helier wards) have long-standing issues of multiple of deprivation and income deprivation, when compared to the wards in the more affluent west of the borough. There are some pockets of deprivation in the west. The Covid-19 pandemic, has not only highlighted these issues but, has widened the gap between the west and east of the borough.
- 4.1.3.** Merton is one of the most diverse boroughs in terms of house prices as it has both more affluent neighbourhoods in the west of the borough (e.g. Wimbledon) and respectively more affordable east of the borough (e.g. Mitcham). Merton's median housing value reached £460,000. This is above both the national (£222,000) and the regional (£450,000) equivalents. It is also higher than the Outer London equivalent of £397,500. Over the last 5, 10 and 15 years Merton's house prices have grown quicker than England and the Outer London Region.

Affordable housing tenure

- 4.1.4. Low cost rented tenure** consists of Social Rented homes and London Affordable Rent. **Intermediate tenure** includes Intermediate Rent and Affordable Home Ownership products such as London Living Rent. All affordable tenures are as defined in the London Plan or any subsequent updates to it. We are committed to ensuring delivery of genuinely affordable housing and rents for both Social Rent homes and London Affordable Rent that are significantly less than 80% of market rents, which is the maximum for Affordable rent permitted by the NPPF (National Planning Policy Framework).
- 4.1.5.** We expect the low cost rented tenure requirement of policy H4.1 to be delivered primarily as social rented housing to better address the overwhelming housing need in Merton. We will support affordable housing which genuinely addresses those in housing need in Merton – that is at household income levels below £38,400, or concerning low cost/intermediate

rent and affordable homeownership that meet the rent levels and prices set out in figs 4.1.1, 4.1.2 and 4.1.3 or subsequent updates to these.

Low cost and intermediate rent levels

4.1.6. Merton’s Strategic Housing Needs Assessment (SHNA) (2019) identified that any household with an income below £38,400 would not be able to afford a lower quartile rent without some degree of subsidy. It also identified a need for around 878-1,084 homes per annum – this is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy and at a household income below £38,400).

4.1.7. Merton’s SHNA analysis sets out appropriate affordable rent (termed as living rents in the SHNA) for different sizes of accommodation in different locations based on local incomes and housing costs in Merton. The analysis shows rents starting at about £400 for a 1-bedroom home (in Mitcham) and rising to over £800 for homes with 3-bedrooms. None of these figures have been capped by Local Housing Allowance (LHA) as the maximum LHA is higher than the affordable rent levels for all sizes and locations in Merton. Rents above LHA should be avoided to ensure housing is affordable to those needing to claim Housing Benefit.

	1-bedroom	2-bedroom	3-bedrooms
Mitcham	£401	£522	£642
Morden	£422	£548	£675
Raynes Park	£467	£607	£747
SW/CW	£474	£616	£758
Wimbledon	£514	£669	£823
Total	£449	£583	£718

Source: ASHE and Living Rents methodology

Figure 4.1.1 Living rents (per month)

4.1.8. For the purposes of testing potential levels of affordable housing to inform Merton’s Local Plan, Merton’s Local Plan Viability Study (2020) assumed affordable rents that do not exceed London Affordable rents as shown in Fig 4.1.2. These rents are broadly equivalent to social/ target rents. In the study London Living Rent tenure was based on the lower end GLA benchmark rents for Merton for that tenure. For schemes proposing London Living Rent we will have regard to these benchmark rents.

Rent type	1 bed	2 bed	3 bed	4 bed
London Affordable Rent (2020/21)	£159.32	£168.67	£178.05	£187.05
London Living Rent (intermediate tenure) ¹⁶	£182.51	£202.79	£223.07	£243.35

Figure 4.1.2 Affordable housing rents (per week)

Affordable home ownership

4.1.9. We seek 10% of all housing on sites of 10 homes and above to be affordable home ownership (as set out in the NPPF2). However, given that the main analysis of affordable need also showed a notable level of need, involving households who cannot afford anything in the market without subsidy, there is no basis to increase the provision of affordable home ownership above the 10% figure. As exceeding this figure would impact the delivery of affordable housing of those in a more acute need.

4.1.10. We will expect affordable home ownership to meet local incomes and local housing costs. Merton's SHNA recommends that prices should be set at a level which (in income terms) are equivalent to the levels needed to access private rented housing in Merton.

4.1.11. Figure 4.1.3 from Merton's SHNA analysis, sets out a suggested purchase price for affordable home ownership in the borough. The figures are based on trying to roughly equate a sale price with an equivalent access point to the private rental market. This shows across the Borough a one-bedroom 'affordable' price of about £149,000 rising to almost £300,000 for homes with four or more bedrooms.

	1-bedroom	2-bedroom	3-bedroom	4+-bedroom
Mitcham	£129,000	£162,000	£195,000	£229,000
Morden	£129,000	£165,000	£195,000	£229,000
Raynes Park	£160,000	£178,000	£227,000	£330,000
SW/CW	£149,000	£184,000	£233,000	£280,000
Wimbledon	£170,000	£204,700	£263,000	£413,000
Borough-wide	£149,000	£184,900	£220,000	£299,000

Source: Derived from Valuation Office Agency data

Figure 4.1.3 Affordable housing home ownership prices (aligned with the cost of accessing private rented sector) – data for the year to March 2018)

4.1.12. Merton’s SHNA recommends that, given the high level of need shown, based on households unable to buy or rent in the market, Merton Council should consider London Living Rents (which can provide a route into home ownership) ahead of shared ownership as a preferred form of intermediate housing. Merton’s SHNA also recommends that if, for viability purposes shared ownership is included this should not make up more than 10% of homes on any individual site. Whilst London Shared Ownership is classes as an affordable tenure (in line with both the London Plan and the NPPF) it is likely to be the tenure that is available to the fewest number of households with a need due to having higher housing costs.

4.1.13. We will have regard to the purchase prices for affordable home ownership, intermediate and low-cost rent levels set out in Merton’s SHNA, and subsequent updates to this information, in its assessment of submitted schemes aimed at achieving provision of genuinely affordable homes that more appropriately addresses affordable housing needs in Merton.

Delivery of affordable homes

4.1.14. Merton is a borough of small sites. On average over the last 12 years more than 90% of the planning applications for new homes submitted to Merton Council were for sites of less than 10 homes. As the London Plan and Merton Council’s previous policy only applied to developments of 10 homes or more, this means that very few developments were eligible to provide affordable housing through the planning system.

4.1.15. For example, Merton’s Annual Monitor Report 2018/19 indicates that in 2018-19 only one development was built in Merton that was greater than 10 homes, and this development was for 11 homes. From this one development five affordable homes were built which totalled a 45% contribution towards affordable housing from the site, above the borough’s 40% target. The delivery of affordable housing has been affected by the introduction of

Prior Approval rights to convert office, retail and storage premises to residential use without the need for full planning permission. This is particularly evident in the financial years 2015/2016 and 2016/2017 where 47% and 36% of the total number of homes built in those years was via prior approval.

4.1.16. Merton is experiencing an increasing number of schemes proposing 100% intermediate housing, as the affordable housing proportion of the scheme, which is contrary to Merton's policy requirement. The reasons provided by proposers is that this is what can be viably delivered and that there is a lack of interest from Registered Providers in managing low cost rented homes in preference to shared ownership homes which they consider a more attractive product. This is evidenced by the fact that Registered Providers in Merton are willing to purchase additional shared ownership homes than what the GLA can offer grant for. However, this situation poses a deliverability mismatch as there is overwhelming needs in Merton for low-cost affordable housing. This illustrates a tension that exists between viability and addressing housing needs.

4.1.17. Merton's SHNA supports the introduction of a 70 / 30 split between low cost rented and intermediate which better benefits people most in need and reflects the unmet affordable housing need to be addressed. This tension is acknowledged in the London Plan which states at paragraph 4.6.1: the 2017 SHMA [Strategic Housing Market Assessment] shows London's significant need for low-cost rental housing, however, the current national funding programme reflected in the Mayor's current Affordable Homes Programme (2016-2021) is focused on intermediate products which limits the Mayor's ability to require higher levels of low-cost rented accommodation. It is however noted that the Mayors new Affordable Homes Programme (2021-2026) which runs concurrently to the current one, makes funding available for social rent products which should help alleviate this issue.

Financial contributions in lieu of affordable housing provision

4.1.18. Off-site provision or in lieu financial contributions secured via legal agreements should provide no financial benefit to the applicant relative to on-site provision and review mechanisms will be included in accordance with the Viability Test Route (VTR) as set out in paragraph 4.4.13 of the London Plan and / or via any guidance provided on Merton Council's website or subsequent updates to these. Provision of affordable housing on all small sites of 2-9 homes (gross), will be as a financial in lieu payment. For schemes proposing 10 or more homes (gross), viability alone is insufficient justification for off-site affordable housing provision or a cash in lieu payment. Only in exceptional circumstances for schemes proposing 10 or more homes (gross) will the provision of affordable housing off-site or as a financial contribution in lieu of provision on site be considered subject to demonstrating to our satisfaction that this exception is justified.

- 4.1.19.** All schemes which propose off-site affordable housing or cash in lieu payments are required to provide a detailed viability assessment as part of the justification that these proposals are acceptable, in accordance with London Plan and Merton's Local Plan policies.
- 4.1.20.** The value of the in lieu payment should be based on the relevant threshold as a percentage of on-site homes. The payment in lieu should be calculated through two appraisals – one with the level of affordable housing required by policy and the other with 100% market housing: The payment in lieu will equate to the difference between the two residual values. Applicants should use the methodology set out in para.
- 4.1.21.** Affordable housing monetary contributions in lieu of on-site provision will be calculated on a case-by-case basis according to the following formula:

$$\mathbf{A-B=C}$$

Where:

A= value of the proposed development assuming 100% of the residential homes are provided as private housing.

B= the value that would otherwise have been achieved by the proposed development incorporating affordable housing in accordance with the affordable housing policy requirement.

C= payment in lieu.

- 4.1.22.** We hold cash in lieu in a separate affordable housing ringfenced pot to enable resources to be pooled to provide greater or more appropriate new affordable housing provision to be made off-site, either on an identified site or as part of an agreed programme in compliance with the statutory tests for use of planning obligations. Merton Council's information on off-site and cash in lieu delivery is monitored and published as part of Merton's Infrastructure Funding Statement.

Dwelling conversions

4.1.23. Merton's Authority Monitoring Report 2018 / 2019 indicates that in the past five years the number of conversion schemes of family homes to smaller sized homes has increased. The supply of one and two bedroom homes significantly exceed the number of three or more bedrooms. In 2018/9, 11% of new housing consisted of studios, 33% one bedroom, 33% were two bedrooms and only 20% were three or more bedrooms. On this basis it is evident that the anticipated number of three-bedroom homes has not been achieved whilst the number of one and two bedroom homes were significantly exceeded.

4.1.24. The conversion of existing single dwellings into two or more smaller homes typically involves the intensification of Merton's suburban housing stock, resulting in the loss of larger homes. Given the identified need for three-bedroom homes and the historical provision of smaller homes, we are seeking to retain the existing stock of family sized homes in Merton. Applications for conversion of existing family sized dwellings into two or more smaller homes must include the re-provision of at least one family sized unit. A family sized unit is defined as having three or more bedrooms.

4.1.25. It is considered that the requirement for proposals involving the loss of a family home to include the re-provision of a new family home strikes a suitable balance between increasing housing density in appropriate areas, but not at the expense of a net loss in much needed existing family sized housing or achieving well-designed development that provides acceptable living conditions.

4.1.26. Some single properties within the borough are too small to convert, as it is not physically possible to provide two or more homes with rooms of an adequate size, or with sufficient internal circulation space. To ensure that dwelling conversions produce residential homes of a high quality, all new dwellings including dwelling conversions must comply with the most appropriate minimum space standards.

Projected population

4.1.27. We encourage the provision of a range of housing tenures, sizes and types to meet the needs of Merton's communities at all stages of life. Merton's SHNA indicates for the period 2017- 2035, the largest growth will be people aged 65 and over.

4.1.28. In 2035 it is projected that the number of residents aged over 65 across Merton is projected to increase by a minimum of 46%. The population aged 85 and over is projected to increase by an even greater proportion, 52%. The London Plan 2021 suggests an annual need for 105 homes in Merton that are specifically designed for the needs of older people sheltered and Extra-care housing). Local research supports the view that the need set out in the London Plan 2021 for older person homes is appropriate for Merton.

4.1.29. Looking at the earlier stages of life, Merton’s SHNA shows that there is projected to be little change in the number of people aged under 15, compared with increases or decreases shown for other age groups. Focussing on the population aged 18-23 (student-age) the analysis below shows that there is projected to be some modest rise in the age group. In total it is projected that the number of people aged 18-23 will increase from 11,300 in 2017 up to 12,800 by 2035, an increase for around 1,500, or 13%.

Maximising affordable housing provision

4.1.30. New homes built under “prior approval” (i.e. without the need for planning permission) are exempt from affordable housing requirements and this further increases these challenging circumstances. Merton is also a borough of small sites due to historically fragmented land ownership. Over the last 10 years to 2017, over 90% of the planning applications Merton has received to build new homes, have been for sites of less than 10 homes, as the table below indicates (please note that the figures in the table below exclude prior approval applications).

2007-2017	Number of Schemes	%	Number of homes proposed.	%	Net gain	%
1-10 homes	1101	94%	2388	38%	1551	30%
11+ homes	71	6%	3887	62%	3621	70%
Total	1172	100%	6275	100%	5172	100%

4.1.31. Therefore, in order to optimise every possibility for providing new affordable homes taking into account the specific circumstances of Merton, it is considered essential to continue to maximise affordable housing provision opportunities, including from small sites, subject to viability.

4.1.32. We will pursue requirements from small sites as financial contributions, as in practice it is our experience that this is what can be delivered. Feedback from affordable housing providers and developers demonstrates that it is difficult to find affordable housing registered providers, willing to take small affordable housing schemes due to the additional costs of managing such sites.

4.1.33. All affordable housing provided within the borough will be subject to nomination agreements with Merton’s Partner Register Providers to ensure that they are occupied by persons nominated by Merton Council. Agreements (currently s106 Agreements) used to

secure affordable housing homes should include provisions for those homes to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable provision.

Measuring affordable housing

4.1.34. Assessment of affordable housing proposals against Merton's planning policy requirements will be measured as habitable rooms as defined by the London Plan. Habitable rooms in affordable and market elements of such schemes should be of a comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace as defined by the London Plan. Applicants should present affordable housing figures and all other housing types and tenures proposed as a percentage of total residential provision in habitable rooms, units and floorspace (both gross [GIA (Gross Internal Area)] and net internal area [NIA]) to enable comparison.

Fast track route

4.1.35. Planning applications that meet or exceed the relevant threshold level of affordable housing as set out in Local Plan policy H4.1, on site within their development as affordable housing without government grants will not be required to submit a viability appraisal. This is known as the fast-track route.

4.1.36. In seeking affordable housing provision, we will have regard to site characteristics such as site size, site suitability and economics of provision such as financial viability issues and other planning contributions.

4.1.37. In Merton's experience introduction of the Mayor's 'fast track route' has resulted in an unchanged position concerning the number of schemes submitted with viability appraisals. We will expect public subsidy / grant to be sought to increase the provision of affordable housing above the stated minimum threshold requirements of policy H4.1.

Policy No. H4.2

Housing Provision

We will aim to deliver a minimum of **11,732** additional homes for the period 2021/22 – 2035/36. This will be achieved by:

- a. Working with housing providers to optimise housing.
- b. Supporting the provision of well-designed new homes that create socially mixed and sustainable neighbourhoods.
- c. Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 and Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.
- d. Supporting the delivery of the small sites target of 261 new homes per year.
- e. Supporting the redevelopment of poor quality existing housing that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis.
- f. Support proposals for custom, self-build and community-led housing which optimise the use of land and meet all relevant policy requirements, such as those for affordable housing.

Justification

4.2.1. We will encourage housing in sustainable brownfield locations. The 11,732 additional homes for the period 2021/22 – 2035/36 will come forward in Merton by:

- Bringing forward housing capacity through regeneration, including Morden town centre.
- Prioritising the development of previously developed land and ensuring it is used efficiently.
- Development of sites identified in Merton's Housing Trajectory.
- Development of windfall sites.
- Enabling mixed use development within the town centres.
- Bringing vacant properties back into use through Merton's empty homes strategy.
- Resisting the loss of housing to other uses.
- Preparing masterplans, development briefs and design guidance for larger housing sites.
- Demonstrating a continuous delivery of housing for at least 15 years as the Housing Trajectory sets out below.
- Setting out a 5-year supply of identified sites as shown in the Authority Monitoring Report.
- Monitoring housing provision levels through the Housing Trajectory within the Authority Monitoring Report.

4.2.2. Merton is a pro-growth borough and has substantial experience in delivering small sites over a long timeframe and throughout different economic and political cycles. Every year, between 85%-95% of Merton's planning applications for new homes are for small sites (sites of 10 homes or less). However, as each small site delivers fewer than 10 homes, small sites contribute about 50% of the overall number of homes built each year in Merton, with large sites (which make up usually less than 10% of the planning applications received) contributing the other 50% of homes built.

4.2.3. Merton's housing target, which is set out in the London Plan 2021, is 9,180 homes for the ten-year period 2019/20 to 2028/29 or 918 homes per annum. This is based on a detailed analysis of land availability and capacity across London that Merton worked with the GLA and all other London boroughs. The London Plan expects 2,610 homes of the 918 homes per annum to come forward on Small Sites. All housing development proposals will be required to meet the requirements of all relevant local plan policies including those contained in the following chapters: *Climate Change; Places and Spaces in a Growing Borough; Health and Well Being; Transport and Urban Mobility and Infrastructure*.

4.2.4. In recognition of the significant increase in housing delivery required by these targets, the London Plan states at paragraph 4.1.10, that these may be achieved gradually and encourages boroughs to set a realistic and where appropriate, stepped housing delivery target over a ten-year period. London Plan paragraph 4.1.11 states that if a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings which cover the period to 2041 and any local evidence of identified

capacity and roll forward the housing capacity assumptions applied in the London Plan for small sites. Figure 4.2.1 sets out Merton’s Housing Trajectory.

4.2.5. In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton’s housing target will be met for the Local Plan period 2021/22 – 2035/36 using a stepped housing delivery target.

4.2.6. Merton’s housing trajectory set out in Figure 4.2.1 is considered an appropriate approach for Merton as it sets out a realistic picture of housing delivery over the Local Plan period. A stepped housing delivery target is appropriate in Merton as there is a significant uplift in the level of housing target between emerging and previous policies, and several large sites will be delivered in phases.

4.2.7. As figure 4.2.2 below indicates Merton’s annual housing target will be set at 775 homes per annum for the period 2021/22 – 2023/24, and then increase to 1,080 for the period 2024/25 – 2026/27, then further increase to 1,350 for the period 2027/28 – 2028/29.

	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total
Merton Local Plan target	775	775	775	1,080	1,080	1,080	1,350	1,350	8,265
London Plan target (including backlog)	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	8,265

Figure 4.2.2 Merton’s stepped housing delivery target

4.2.8. In accordance with London Plan paragraph 4.1.11, Merton’s target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to 2035/36 of 1,096 as indicated in the following table:

Plan period	Target
2029/30 - 2033/34	2,370
2034/35 – 2035/36	1,096
2029/30 – 2035/36 Total	3,466

Merton Housing Trajectory 2021/22 - 2035/36

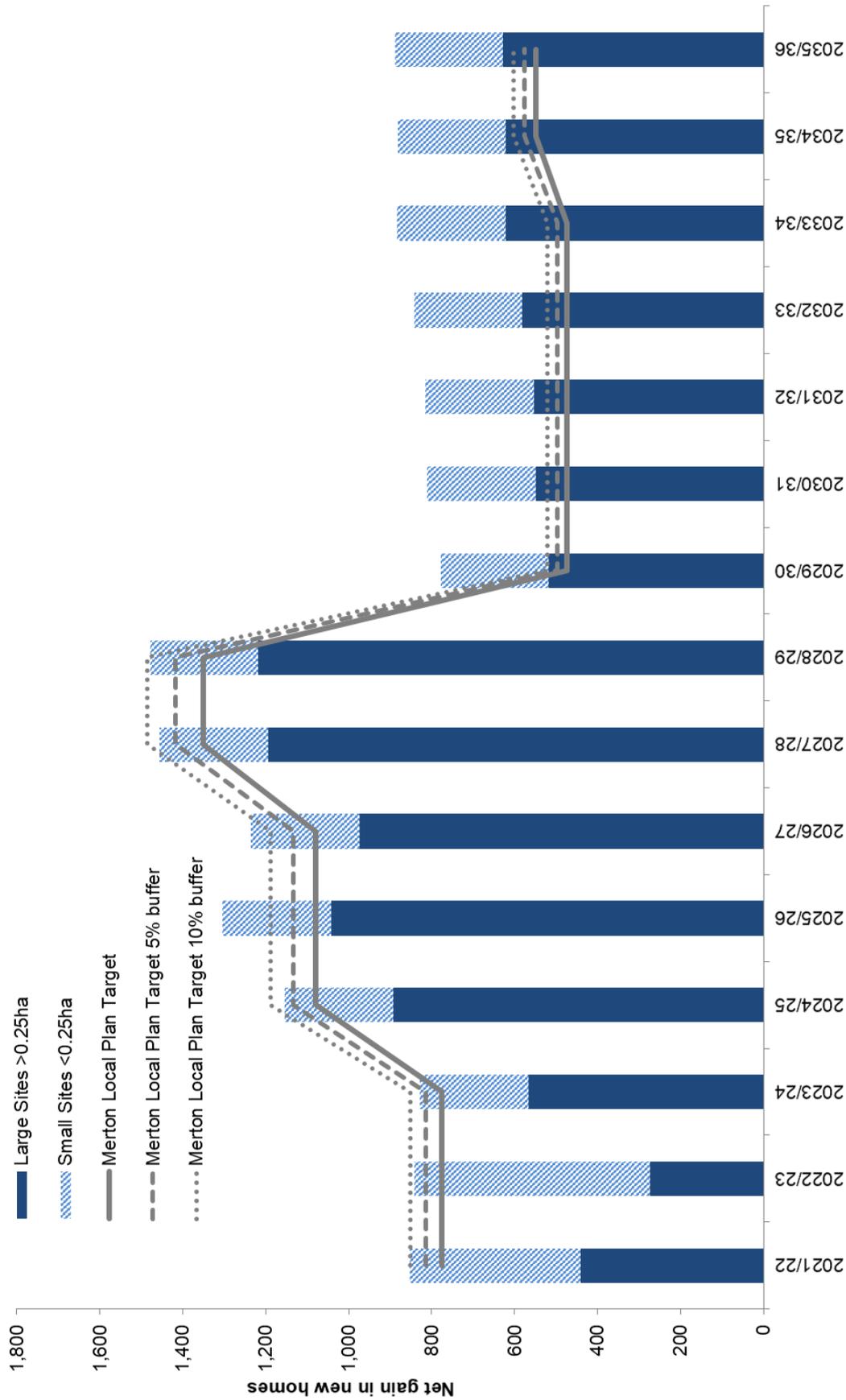
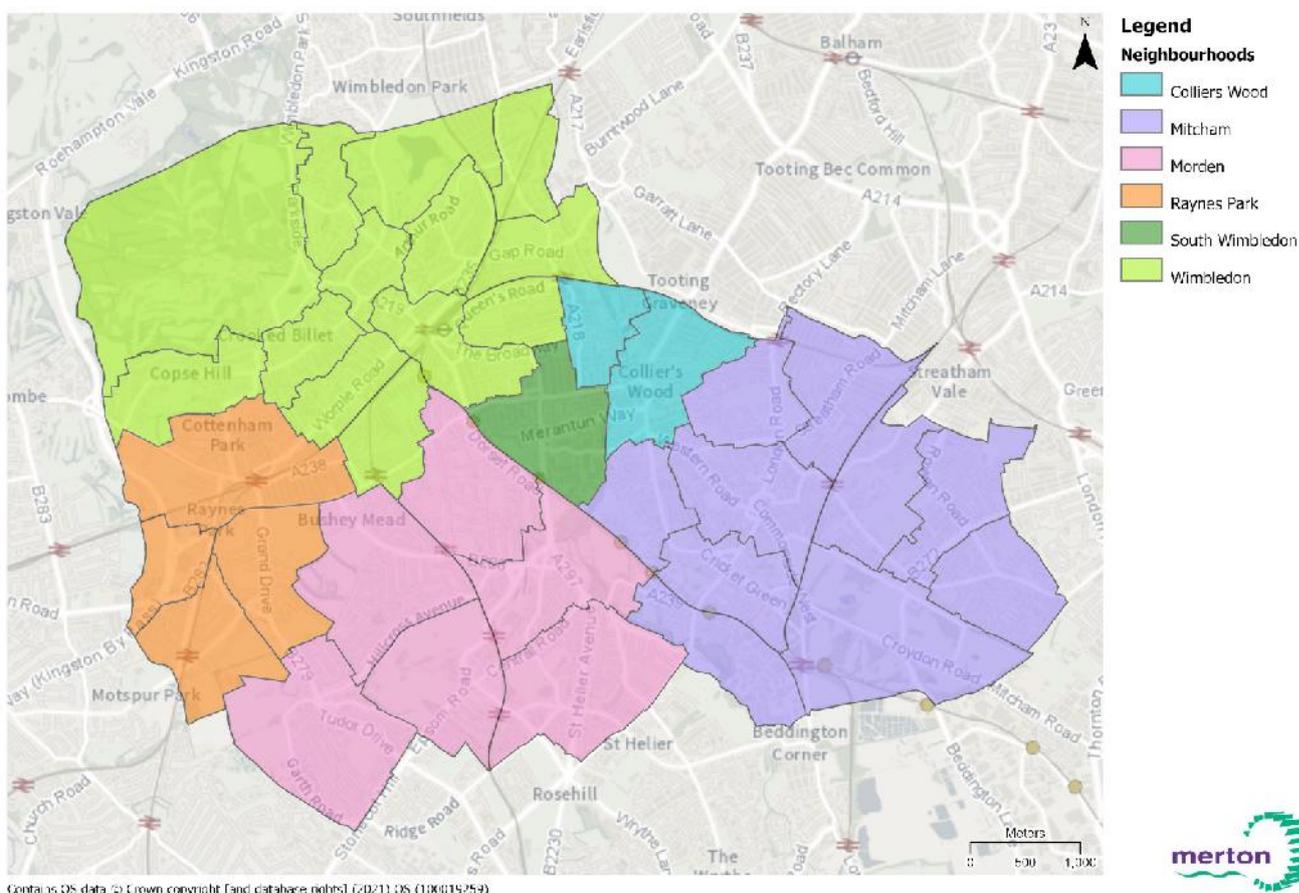


Figure 4.2.1 Merton's Housing Trajectory for the Plan period 2021/22 to 2035/36

4.2.9. Merton’s housing trajectory is supported by Merton’s Housing Delivery Test Actions Plan which includes details on the actions the council can take to increase the rate and number of homes built in Merton. The delivery of sites will be monitored in Merton’s Authority Monitoring Report (AMR) and Merton’s Housing Delivery Test Action Plan.

4.2.10. The London Plan envisages that key town centres in the borough – Wimbledon, Mitcham, Morden and Colliers Wood – offer ‘high’ potential for residential growth (Table A1.1), with Wimbledon, Colliers Wood and South Wimbledon identified as an Opportunity Area which indicatively is expected to contribute 5,000 new homes and 6,000 jobs. The Opportunity Area homes figure is based on the 2017 SHLAA capacity from 2019 to 2041.

4.2.11. Assessment of projected housing over the Local Plan period by locality, indicates as set out in Fig. 4.2.3 that the majority of residential growth and associated infrastructure and social facilities will take place in Morden, Mitcham and Wimbledon which are characterised with good public transport access.



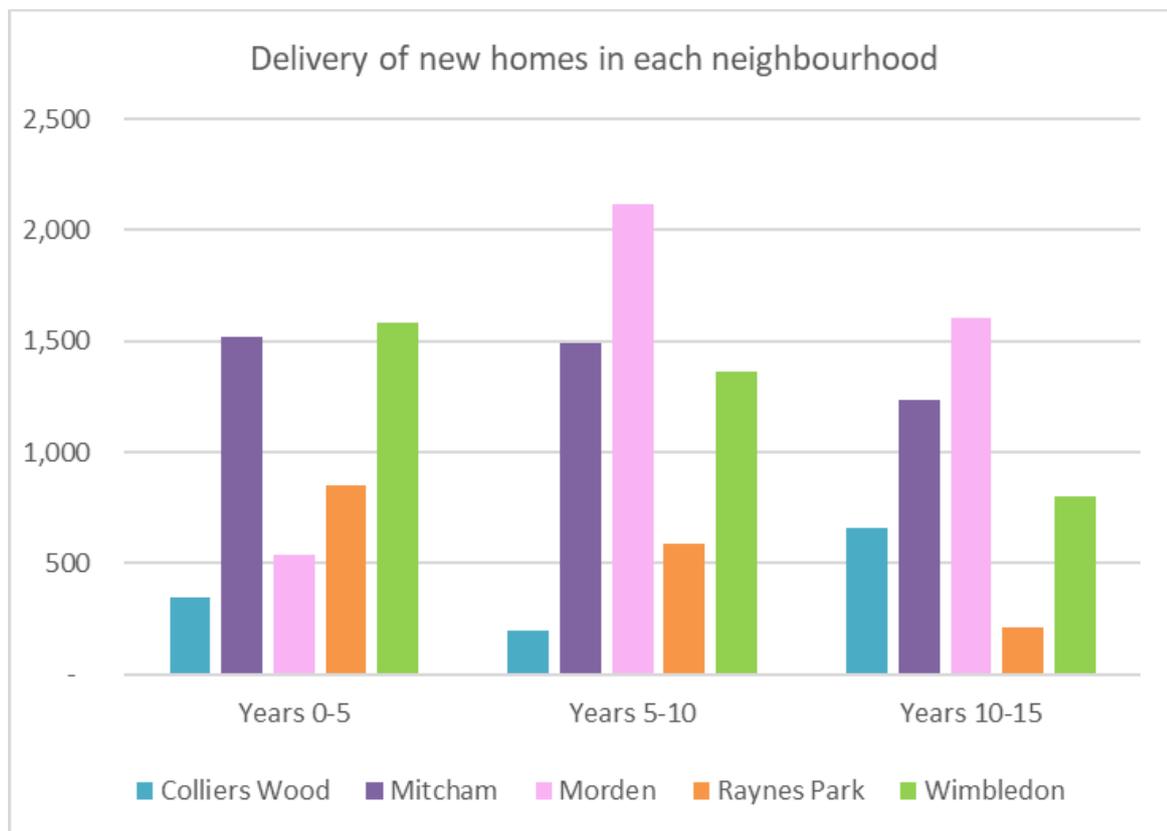


Figure 4.2.3 Delivery plan of new homes by neighbourhood

4.2.12. The regeneration of Morden town centre is a key priority for Merton Council and the emerging Local Plan by means of policy N3.3 and site allocation Mo4, which seek to enable delivery of around 2,000 homes within the Morden Regeneration Zone.

4.2.13. Mitcham is proposed to accommodate a range of new homes, including major development sites of Eastfields and Ravensbury estates and other such as Benedict's Wharf. For Raynes Park larger sites close to Shannon Corner and incremental development within the surrounding neighbourhood will contribute to providing new homes. These are set out in more detail in the area-based policies within this Plan.

4.2.14. Wimbledon is similarly proposed to accommodate a range of new homes, including major development sites of Wimbledon Stadium, Wimbledon YMCA, and High Path estate regeneration.

4.2.15. Merton's Local Plan and accompanying proactive strategies that support future housing delivery, such as Merton's Character Study and Small Sites Toolkit, are pro-growth and geared towards optimising the provision of good quality and design-led housing to meet

this ambition. For a decade Merton have been allocating sites of any size i.e. no minimum small sites threshold and has taken forward initiatives including town centre regeneration, estate regeneration and modular construction of affordable homes. Merton will continue to bring forward and support these initiatives.

- 4.2.16.** Merton's Character Study SPD (2021) identifies appropriate areas where there is potential for a range of sensitive and extensive character-led growth. At the heart of the study is to ensure that future shaping of the borough is informed by Merton's existing and unique character.
- 4.2.17.** The Small Sites Toolkit SPD (2021) is designed to give designers and developers a clearer picture of what would be considered acceptable development on sites up to 0.25 hectares in the Borough. The toolkit will comprise of guidance notes, case studies and a design and access statement template. The guidance in the toolkit builds on the findings of the Character Study in providing contextual advice to applicants and their design teams. The guidance aims to encourage more development by giving a greater certainty of approval in addition to improving overall design quality.
- 4.2.18.** There are a number of factors outside of local planning authority control that influence housing delivery including macroeconomics, economic effects of Covid-19, house prices, land values, investment confidence and finance availability. However, it is considered that our proactive strategies will contribute to support future housing delivery despite these factors.
- 4.2.19.** Due to the overwhelming need for permanent homes compared to temporary accommodation, we do not support short term rental residential accommodation (either purpose built or converted) such as apart-hotels on sites that are suitable for permanent housing.
- 4.2.20.** In accordance with government requirements we maintain a self-build register. As at June 2021 there were 104 individuals and 9 groups on the part 1 Self-Build Register (meets local connection criteria) and 132 individuals and 1 group on the part 2 Self-Build Register (without a local connection). 17 homes were granted self-build exemption from Community Infrastructure Levy (CIL) in the financial year 2019/20.
- 4.2.21.** Whilst self and custom build homes form part of the overall mix of housing, high demand for sites result in high land values making it challenging for self and custom builders to compete against other house builders to acquire available sites. As self and custom build homes are regarded by mortgage lenders as non-standard homes, obtaining a mortgage for these can be challenging and therefore this type of development is more reliant on self-financing.

4.2.22. As supported by the London Plan, Houses in Multiple Occupation (HMOs) contribute towards addressing needs. As with all homes, HMOs will be expected to meet good standards both for the occupiers and neighbours and we will have regard to relevant guidance in the assessment of HMOs including national guidance, the London Housing Design Standards, the GLA Housing Supplementary Planning Guidance.

Policy No. H4.3

Housing mix

Residential development proposals must contribute to meeting the needs of different households such as families with children, single person households and older people by providing a mix of dwelling sizes, taking account of the following borough level housing mix:

-	1 bed	2 bed	3+ bed
Borough wide	33%	33%	34%

The borough level housing mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision.

Justification

4.3.1. Research in London and in Merton shows that there is an overwhelming need in London and in Merton for all types and sizes of new homes. Like much of London overcrowding exist in Merton which need to be eliminated. The 2011 Census indicated that 9.2% of Merton’s households are in overcrowded accommodation. Assessment of housing delivery in the borough over the past 15 years indicates a disproportionately greater delivery of smaller homes compared to larger homes.

4.3.2. In 2018/19 11% of the new homes built were studio homes; 33% one bedroom, 33% were two bedrooms, 13% three bedrooms; 7% four bedrooms and 3% were unknown.

4.3.3. Merton’s SHNA sets out the size of housing required.

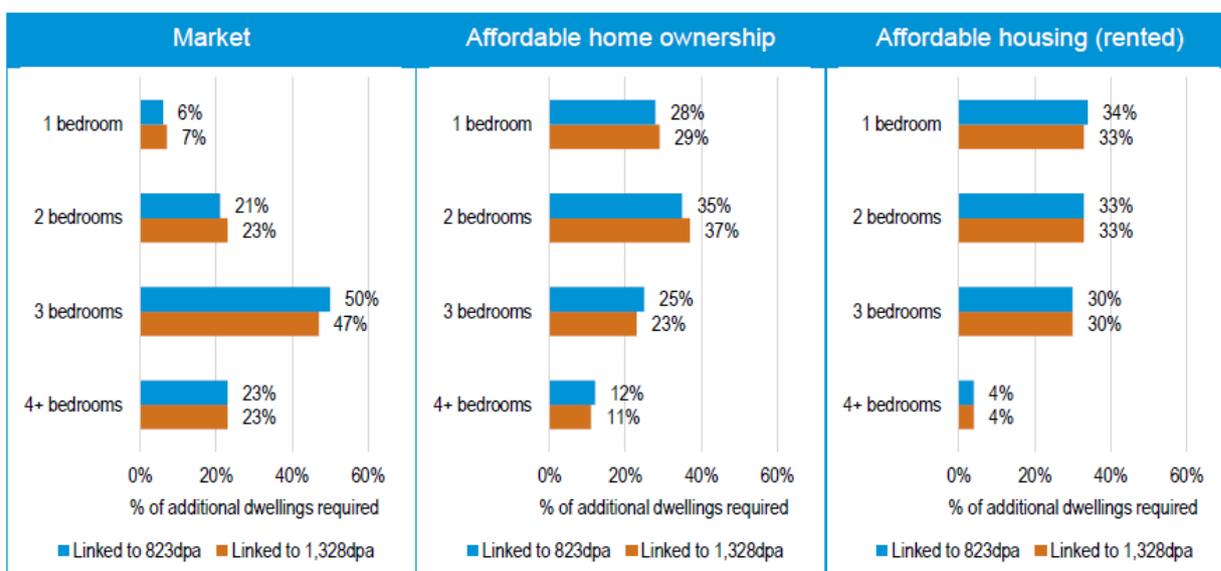


Figure 4.3.1 Size of housing required 2017 – 2035

4.3.4. It indicates that for affordable housing need is more heavily skewed towards smaller dwellings, and affordable home ownership sits somewhere in between the market and affordable (rented) housing but closer to the affordable rented sector. For market housing the need is skewed more heavily towards three and four bedroomed homes. Studio apartments do not adequately meet the housing needs of most households.

4.3.5. Analysis linked to the demographic change in the period to 2035 set out in Merton’s SHNA supports the housing mix set out in Policy H4.3 as an appropriate mix. In the affordable sector it is recognised the role which delivery of family homes can play in releasing supply of smaller properties for other households; together with the limited

flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.

- 4.3.6.** Based on Merton's SHNA evidence it is expected that the focus of new market housing provision will be on two and three bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2 and 3 beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay.
- 4.3.7.** We are keen to encourage socially mixed, sustainable communities with a greater choice and mix in the size, type and location of housing. Schemes should seek to reflect the diversity of the local population, local needs and provide an appropriate mix of smaller and larger homes including houses and flats to meet a mix of different households such as single households, families with children and older people.
- 4.3.8.** In assessing development proposals, we will take account of the housing mix proportions set out above.
- 4.3.9.** This mix is informed by a number of factors, including, local housing needs research deliverability, viability, affordability, land availability and data concerning waiting lists.
- 4.3.10.** The borough level housing mix proportions will be applied having regard to relevant factors including individual site circumstances, site location, identified local needs, economics of provision such as financial viability and other planning contributions. Where a developer considers a site unsuitable to apply the borough level housing mix set out in Policy H 4.3 the developer will be responsible for demonstrating why this is the case.
- 4.3.11.** Gated development may address security concerns; however, they restrict public access and therefore, choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion.

Policy No. H4.4

Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.

- a. The suitability of proposals for supported care housing will be assessed having regard to the following criteria:
 - i. Demonstrable need.
 - ii. The proximity of the site to public transport facilities.
 - iii. The provision of a safe and secure environment.
 - iv. The provision of an adequate level of amenity space which is safe and suitable.
 - v. The provision of adequate parking facilities for residents, staff and visitors.
 - vi. The convenience of the site's location in relation to local shops, services and community facilities.
 - vii. The quality of accommodation complies with all relevant standards for that use.
- b. Generally, proposals for supported care housing will be expected to provide affordable housing in accordance with Strategic Policy H4.1 Housing Choice, unless nominations for people in housing need can be made available through Merton Council.
- c. We will resist development which results in the net loss of supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system unless either:
 - i. adequate replacement accommodation satisfies criteria H4.4 a (i) to (vii) inclusive above; or,
 - ii. it can be demonstrated there is a surplus of the existing accommodation in the area; or,
 - iii. it can be demonstrated that the existing accommodation is incapable of meeting relevant standards for accommodation of this type.
- d. Where we are satisfied that the requirements of criterion (c) of this policy have been met, we will require that an equivalent amount of residential floorspace (Use Class C3) to be provided to help meet Merton's need for permanent homes. These proposals will be considered in respect to Strategic Policy H4.2 Housing Choice.

Justification

4.4.1. Policy H4.4 relates to any form of housing if it has been designated for use by vulnerable people or people being housed as part of the criminal justice system (bail / probation hostel) and commonly accommodates residents who get support from designated members of staff. It includes the following forms:

- Self-contained homes where vulnerable people, or people being housed as part of the criminal justice system live individually or as part of a family (usually in use class C3).
- Shared homes occupied by no more than 6 people (usually in Use Class C3 but where no care is provided on-site some fall within Use Class C4).
- Clusters of self-contained homes or self-contained homes / bedsits within a scheme designated for vulnerable people, where low intensity support is available, sometimes on site (usually in Use Class C3, depending on the nature of the support).
- Hostels for a number of households or individuals. The occupiers are usually linked in terms of circumstances or age group. There is usually a common management regime and some shared facilities. Hostels are outside any use class.
- Care homes and other supported accommodation where care is provided 24 hours a day (usually in Use Class C2).
- Secure residential institutions (usually under Use Class C2A).

4.4.2. Policy H4.4 does not relate to:

- Self-contained homes that are suitable to meet general needs.
- Hostel accommodation aimed at other non-vulnerable groups such as students and backpackers; or,
- Other types of accommodation in Use Class C2 but not specifically for vulnerable people, such as hospitals, boarding schools, residential colleges and training centres.

4.4.3. Vulnerable people include those with physical and sensory impairment, a disability, drug and alcohol dependency or people who have experienced or are at risk of violence (e.g. domestic or hate crime).

- 4.4.4.** Care for the elderly, the vulnerable or disadvantaged groups and for persons with health problems, learning difficulties, mental illness or physical disabilities are becoming increasingly community-based. People are increasingly choosing to live in their own homes with some supported care and assistance, or in supported communities.
- 4.4.5.** Client groups living in supported accommodation include older people, homeless people with support needs; people with mental health problems; ex-offenders; people with physical disabilities and sensory impairment; people with learning disabilities; people with alcohol problems or HIV/AIDs, and people experiencing domestic violence or victims of hate crime.
- 4.4.6.** A variety of supported care accommodation is required for persons who require different levels of assistance, support or care in order to live independently. We encourage the provision of non-institutionalised supported care housing with self-contained facilities for which there is demonstrable need. Supported care housing may include sheltered accommodation, extra care housing, and other types of care homes, on-site accommodation for care workers, rehabilitation facilities, crisis response, as well as respite for carers.
- 4.4.7.** Generally, supported care housing will be located within easy access to shopping facilities and services in locations with good access to public transport, or with adequate on-site facilities, because of low car ownership and in some instances reduced mobility of the client group. This would be considered on a case-by-case basis having regard to a number of factors including the number of clients, staff and visitors and the likely mobility of the clients. Residential locations may be appropriate. Town or local centres may also provide suitable opportunities for provision, given the proximity of such locations to good public transport and local amenities, but this needs to be balanced against other relevant suitability factors e.g. noise.
- 4.4.8.** High quality design can help to provide design solutions (e.g. ramps and levelled changes) that overcome topological issues and provide accommodation that is fit for purpose.
- 4.4.9.** Supported care housing should incorporate designed security features that create a safe place to reside where opportunities for criminal behaviour are reduced. Design should consider the principles contained in government guidance on Safer Places Secured by Design guidance and Royal Town Planning Institute (RTPI) *Dementia and Town Planning: Creating better environments for people living with dementia* and other publications mentioned in the health and wellbeing policies in this plan.

- 4.4.10.** Housing sites that have a lower market value than those available for general market housing are rare. To help meet Merton's housing needs as identified in the London Plan, we will resist development that would involve the net loss of residential floorspace.
- 4.4.11.** Generally, proposals for supported care housing will be expected to provide affordable housing in accordance with this Local Plan's strategic policy on Housing Choice, unless nominations for people in housing need with a reasonable preference on Merton's council waiting list, or people in housing need referred by one of the council's nomination panels for vulnerable people can be made available through the council.
- 4.4.12.** Where self-contained housing (e.g. sheltered housing categories 1, 2 and 2.5, and extra care housing) is proposed for occupants to buy, rent or lease we will seek affordable housing in accordance with Strategy Policy Housing Choice. By contrast residential care institutions (usually in Use Class C2 / C2A) operate on a fee charging basis, with occupants not given a tenancy, and often moving in and out of these institutions depending on their care needs. Local authorities do refer people to care institutions, via adult social care services rather than from the Housing Register. As such it is unlikely that care institutions will be considered to meet the Strategic Local Plan Policy on Housing Choice concerning affordable housing provision. However, we will assess all proposals on a case by case basis.
- 4.4.13.** Proposals must demonstrate that they cater for needs identified in a Local Housing Market Assessment or in an appropriate needs assessment such as that of a recognised public body. There is a recognition that the private sector also caters for those in housing need and that this role in partnership with Merton Council is continuing to grow as this sector responds to the falling levels of public expenditure.

Policy No. H4.5

Student Housing, other housing with shared facilities and bedsits

- a. The development of student housing, other housing with shared facilities and bedsits is supported provided that the development:
- i. will not involve the loss of permanent housing.
 - ii. will not compromise capacity to meet the supply of land for additional self-contained homes.
 - iii. meets an identified local need.
 - iv. is well designed and positively contributes to residential character and amenity.
 - v. complies with all relevant standards for that use; and,
 - vi. is fully integrated into the residential surroundings.

Additionally, with regards to student housing.

- vii. caters for recognised educational establishments within a reasonable travelling distance.
- viii. provides purpose built dedicated floorspace that is managed for cultural or arts studios or activities.
- ix. during term-time, it is available exclusively to students.
- x. includes a range of layouts including those with shared facilities.
- xi. is located in an area well served by public transport concerning the recognised higher educational establishment it serves.
- xii. provides high quality cycle parking facilities.
- xiii. has an ownership or management arrangement secured by legal agreement in place with the recognised higher educational establishment it serves; and,

- xiv.** Ensure that at least 35% of the accommodation is secured as affordable student accommodation or 50% where the development is on public sector land or where redevelopment would result in a loss of industrial capacity as defined through the London Plan and associated guidance.
 - xv.** Where requirements H4.5 from (vii) to (xiv) inclusive cannot be demonstrated the proposal will be considered under Policy 4.1 Housing Choice in respect of affordable housing provision.
- b.** We will resist development which results in the net loss of student housing and other housing with shared facilities and bedsits unless either it can be demonstrated that:
- i.** there is a surplus of the existing accommodation in the area; or,
 - ii.** the existing accommodation is incapable of meeting relevant standards for accommodation of this type.
- c.** Where we are satisfied that the development results in the net loss of student housing, other housing with shared facilities or bedsits, is justified, we will require that an equivalent amount of residential floorspace or permanent self-contained housing in Use Class C3 to be provided and these proposals will be considered in respect to Strategy Policy Housing Choice.

Justification

- 4.5.1.** This policy relates to student housing and housing with shared facilities and bedsits other than that to which Policy DM H4.4 applies (supported care housing for vulnerable people or people housed in secure residential institutions as part of the criminal justice system).
- 4.5.2.** A recognised higher educational establishment generally refers to those funded by the Higher Education Funding Council for England (HEFC). Wimbledon College of Art, Wimbledon is found within Merton. Additionally, there are several higher education establishments found wholly or partly within neighbouring south London boroughs which are Kingston University, Roehampton University, St George's Medical School and St Mary's University College Twickenham.
- 4.5.3.** Student accommodation is both a local and strategic issue. The provision of student housing, other housing with shared facilities and bedsits can make a useful contribution to creating mixed and inclusive communities and meeting London's housing need. However, addressing these demands should not compromise the borough's capacity to meet the relatively more pressing need for conventional permanent self-contained homes, affordable homes and family homes.
- 4.5.4.** Merton is currently meeting its share of London's general housing needs and can demonstrate a 5-year supply of deliverable housing sites. However, Merton is characterised by small sites for delivering new homes, which limits the opportunities to actively promote housing delivery.
- 4.5.5.** The need for more housing in the borough and the paucity of sites, particularly large sites, means that the provision of student housing could further worsen the challenge meeting the needs for permanent homes.
- 4.5.6.** There is an overwhelming need to provide additional conventional housing in Merton. It is considered that set within this challenging context, the requirement for student accommodation to caters for recognised educational establishments within Merton or neighbouring south London boroughs of Croydon, Lambeth, Kingston-upon Thames, Richmond, Sutton and Wandsworth strikes a suitable balance towards meeting the Mayor's strategic and local requirements for student housing, whilst minimising the compromise on Merton's capacity for conventional homes. It is also important that the provision of new student accommodation is located close to their places of study, as inadequate provision would result in students having to travel long distances to attend their place of study contrary to sustainable development principles.

4.5.7. Housing with shared facilities form a significant part of the private rented stock in Merton. The precise definition of housing with shared facilities and bedsits is complex but includes the following groups:

- A bedsit where the bathroom is shared with tenants of other bedsits.
- A flat in a house whether bathroom facilities may or may not be shared with other tenants.
- A room in a shared house where the bathroom and kitchen facilities are shared with the tenants of the other rooms, but the tenants do not live with the other tenants as part of a 'household', for example don't cook for one another and eat together like a family would.
- Rented rooms provided by a resident landlord.
- Bed and breakfast hostels.

4.5.8. In line with the London Plan, we will resist the loss of permanent self-contained homes including its loss from conversion to short-stay accommodation intended for occupation for periods of less than 90 days.

4.5.9. Student housing, other housing with shared facilities and bedsits are often associated with a concentration of relatively short-term residents. We will assess these having regard to any existing concentrations in the area, the impact of new occupiers on local services and facilities and the wider housing mix. Possible concerns such as noise disturbance and increased demand on local facilities and public transport need to be carefully considered and addressed in relation to these proposals to ensure that adverse impacts on existing longer-term residents are minimised.

4.5.10. Schemes will be considered on a scheme by scheme basis having regard to census information, Merton's Authorities Monitoring Report and permissions for student housing schemes in the area.

4.5.11. Student housing can positively contribute to mitigating pressure on the stock of private rented homes in Merton provided that it is genuinely aimed at higher education establishments. We will use design mechanisms, planning conditions and / or legal agreements as appropriate to prevent lease, sale, use or occupation of the student accommodation as general market housing and to limit their term time occupation to students registered at higher education establishments that are based in Merton or the adjoining boroughs and supported by the Higher Education Funding Council for England.

4.5.12. Student housing developments will also be expected to provide adequate floorspace, usually on the ground floor of the development, which has favourable management terms for cultural or arts studios or other activities. Wimbledon School of Art is Merton's only third-level education provider, affiliated to the University of the Arts, London. We will encourage developer to work with specialist organisations that rent and manage floorspace dedicated arts and cultural activities.

Policy No. H4.6

Accommodation for Gypsies and Travellers

Existing legally established Gypsy and Traveller accommodation sites will be retained and protected from redevelopment except where the same number of pitches is provided on an alternative site in the borough.

Proposals for additional, alternative or new Gypsy and Traveller sites will be assessed having regard to the following criteria:

- a. The provision of on-site landscaping, which seeks to enhance the amenity of the site and which facilitates the integration of the site with the surrounding environment and amenity of occupiers of adjoining land.
- b. Access, proximity to a main road, parking and area to allow turning and manoeuvring.
- c. Proximity to shops, schools, health services and other community facilities.
- d. Provision of appropriate on-site facilities such as children's play facilities.
- e. The suitability of ground conditions, particularly in respect to the potential to flooding.
- f. The need or demand for accommodation provision and the available capacity on existing sites in the borough.

Justification

- 4.6.1.** Merton Council's Gypsies and Travellers site is located on Brickfield Road and is managed by Clarion Housing. Merton's Accommodation Needs Assessment of Gypsies and Travellers Research (2013), indicated that for the period of 2014 - 2019 re-letting of vacant pitches would address identified needs. There are no known Travelling Show people residing in Merton and no identified accommodation need for Travelling Show people plots within Merton.
- 4.6.2.** In 2019 Merton's Gypsy and Traveller Accommodation Assessment (GTAA) was prepared to update the needs identified in the 2013 Study and how this will be addressed over the Local Plan period. The 2019 Study identified future accommodation need for the period 2019-2034 summarised in the following table below:

Table S.1: Summary of Gypsy and Traveller pitch needs 2019-34				
Period	2019-2024	2024-2029	2029-2034	Total
DLP	6	0	0	6
PPTS	0	0	0	0
Work	0	0	0	0

Source: GTAA 2019

DLP = assessment of needs based on the 2017 Draft London Plan definition, now out of date and replaced by 2021 London Plan

PPTS = assessment of need in Merton based on government's 2015 Planning Policy for Travellers (still in date)

Work = assessment of needs in Merton based on travellers working in Merton (still in date)

- 4.6.3.** The 2019 Study identified that in relation to Gypsies and Travellers, the main drivers of need, based upon the then 2017 Draft London Plan definition (DLP), were from 'hidden' (or 'concealed' families) and psychological aversion of households living in bricks and mortar accommodation.
- 4.6.4.** With the exception of the 2017 Draft London Plan (DLP) based need within the first five years, the accommodation need arising over the 15 years is all counterbalanced by additional supply emerging over the 15 years (including vacant pitches and pitches becoming vacant over time). With the exception of the need of 6 based on the 2017 Draft London Plan definition, there is no additional need for the local authority to address.
- 4.6.5.** The 2019 Study identified no known Travelling Showpeople residing in Merton and as such no need for plots within the Borough for them. For transit provision it recommended

that a corporate policy be established to address negotiated stopping places for small scale transient encampments, and that it continues to work with local authorities across the sub-region to provide new transit provision.

4.6.6. Since the 2019 Study was completed, the London Plan was published in March 2021. The Examination in Public Inspector's report recommended, that the definition of Gypsies and Travellers in the 2017 Draft London Plan should be consistent with national policy (2015 Planning and Policy for Travellers Sites – PPTS). The 2021 London Plan reflects the Examination in Public Inspector's recommendation. As a result, the implications for the 2019 Study findings regarding the need for 6 additional pitches in Merton are no longer valid.

Policy No. H4.7

Build to rent.

Built to Rent schemes must provide:

- a. A minimum of 50 homes.
- b. A mix of housing sizes to reflect local need for rented property.
- c. Up to 3-year tenancies with longer tenancies (three years or more) being available to all tenants. Tenancies should have a six-month break clause in the tenants favour and pre-agreed structured and limited in-tenancy rent increases.
- d. The homes are secured as Build to Rent under a covenant for a minimum period of 15 years.
- e. Security and professional management of the homes.

Development of Build to Rent schemes must meet the requirements of London Plan policy H11 and the Mayor of London's Affordable Housing and Viability SPG (2017), with the intention of maximising the viable supply of affordable homes (known as the affordable housing requirement). In Merton, Build to Rent schemes must meet the following affordable housing requirements:

- f. To follow the Fast-Track Route, Build to Rent Schemes must deliver a minimum of 35% affordable housing provision or 50% where the development is on public sector land or where redevelopment would result in a loss of industrial capacity, comprising of a tenure of at least 30% affordable housing provision at London Living rent equivalent level with the remainder at a range of genuinely affordable rents to meet priority housing need in Merton. If these requirements are not met, the scheme must follow the Viability Tested Route.
- g. Merton Council's nomination rights to secure nomination of tenants to specified affordable homes and the management and monitoring arrangements will be secured via planning obligation (s106 legal agreements) or other appropriate legal deed. All affordable housing elements of the scheme must be affordable in perpetuity.
- h. A clawback mechanism must be in place that ensures that where any of the Built to Rent homes are sold within the 15 years this will trigger a penalty charge towards affordable housing provision in accordance with Policy H4.7(f).
- i. Where the requirements of H4.7(f) above are not met, schemes must follow the Viability Tested Route requirements set out in London Plan Policy H5 and The Mayor of London's

Affordable Housing and Viability SPG (2017). Viability Assessments should include taking account of the differences between development value of the Build to Rent scheme and Build for Sale scheme and be undertaken in line with the Mayor of London's Affordable Housing and Viability SPG (2017).

Justification

- 4.8.1.** Build to Rent schemes contribute to increasing the range and offer of homes available to Londoners which is supported. Build to Rent schemes must provide at least 50 homes in accordance with the requirements of London Plan policy H11.
- 4.8.2.** Build to Rent schemes may be attractive to potential tenants given the longer tenancies and on-site maintenance teams. However, these unique features of build to rent can result in higher than average rental costs, worsening an already critical issue for many renters, especially in London.
- 4.8.3.** Given the borough's limited land availability and the significant need for more housing, and in particular the pressing need for affordable housing that genuinely addresses those in housing need in Merton, we support the incentives and approach set out in London Plan Policy H11 to encourage affordable housing provision as part of Build to Rent schemes.
- 4.8.4.** By having nomination rights, we will help to ensure that prospective tenants have been appropriately vetted as in genuine need in terms of the inability to access rented accommodation on the open market locally.



07. HEALTH AND WELLBEING

Strategic policy HW2.1 Health and wellbeing.

We will continue to improve and promote a more active and healthier lifestyle of our residents, tackle the causes of ill health (physical and mental), and health inequalities in Merton. This will be achieved by:

- a. Working with strategic partners such as NHS (National Health Service) England, Clinical Commissioning Groups (CCG) and Merton's Health and Wellbeing Boards in tackling health inequalities, public health safety (for example during pandemics and other health emergencies), promoting and encouraging healthy lifestyles and create healthy environments in Merton for all.
- b. Improving access to healthcare, voluntary organisations and community health facilities.
- c. Addressing and reducing the health inequalities in Merton as identified in Merton's Health and Wellbeing Strategy and the Joint Strategic Needs Assessment.
- d. Tackling Merton's childhood obesity as identified by Merton's Child Healthy Weight Action Plan especially in areas of deprivation.
- e. Working with Alzheimer's Society, Merton Dementia Action Alliance and other partners to make Merton a Dementia Friendly borough, helping all those living with dementia in the borough in line with the Mayor's ambition to make London a Dementia Friendly city.
- f. Ensuring that 20-minute neighbourhoods are planned and designed well in accordance with 20 minutes approaches which, promote and enable healthier and active living, adopt active aging approaches and improve access to green infrastructure
- g. Improving air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.
- h. Improving the public realm in accordance with the Healthy Streets Approach and Active Design principles to provide an improved network of safe and convenient pedestrian and cycle routes that enable healthy and active travel choices, especially in areas identified as Air Quality Focus Areas in Merton's Air Quality Action Plan.
- i. Ensuring that our neighbourhoods are inclusive and accessible for all and encourages social interaction.
- j. Achieving an integrated approach through a number of policies in the local plan, for example infrastructure, green and blue infrastructure, air quality, climate change, transport and design policies to improve health (including mental health) and wellbeing.

Justification

Coronavirus (COVID-19 pandemic)

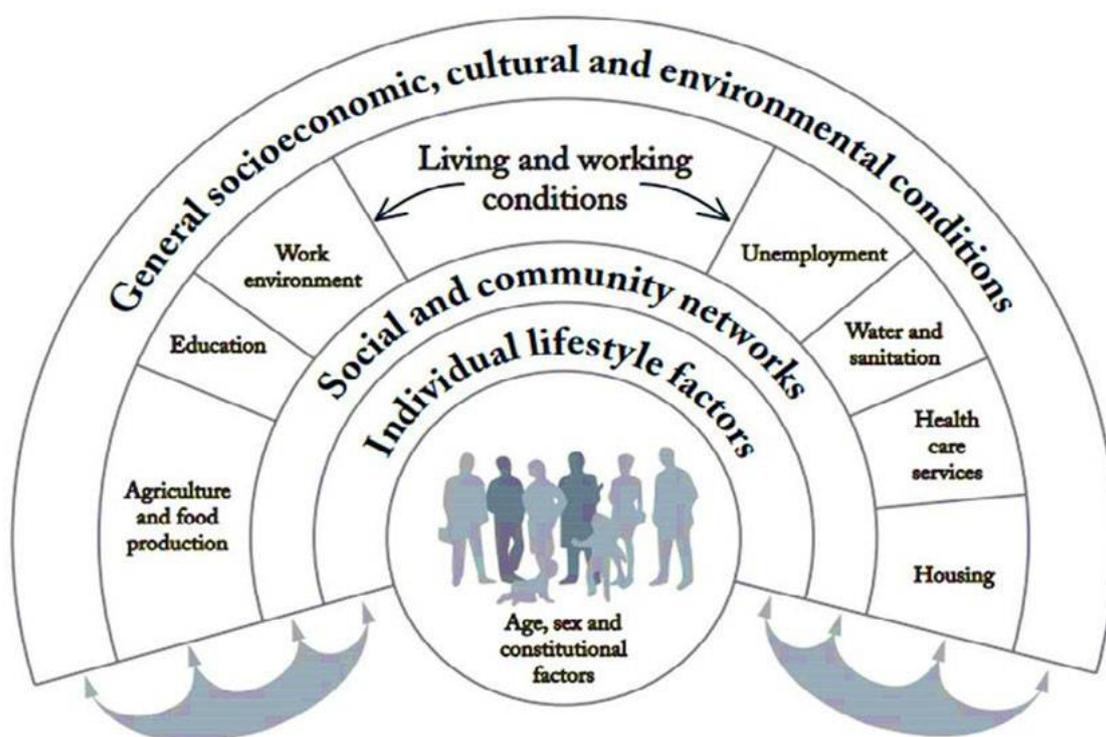
- 1.1.1. The coronavirus (COVID-19) pandemic has been described as a watershed moment for inequalities. Covid has put the national focus on inequalities, especially the link between health and income. It has deeply exposed known inequalities and will further no doubt compound them. The impact on mental health could lead to a longer-term erosion of people's physical health affecting people who have not previously experience poor mental health.
- 1.1.2. The way we use our homes has changed; more people are working from home. This has brought to light the importance of excellent quality and adaptable housing including personal, work and outdoor space.
- 1.1.3. During the pandemic visits to parks and public green spaces increased across London. The pandemic has exposed the benefit of access to green spaces and nature for physical activity and play, mental wellbeing and mental resilience. Several surveys carried out on people with lung condition found that around 20% reported improvement to their conditions. This is contributed to the short-term reductions in levels and exposure of air pollution (for example PM25 and NO2) during lockdown and social distancing measures.
- 1.1.4. The pandemic highlighted that behaviour change is possible. This behaviour change has been a direct and implemented by government and legislation. Behaviour change at a local level may not be able to be that direct but done in an integrated way we can create healthier and greener environments which will encourage and enable behaviour change such as walking and cycling.
- 1.1.5. The recovery after covid-19 is a priority for Merton Council, not just the economic but also the health and wellbeing recovery. Our response to this health crisis will shape how we will deal with population health in the next decades. Covid-19 pandemic will offer lessons and opportunities leading to action.

Wider determination of health

- 1.1.6. The creation of healthy environments for people of all ages in Merton will be a key consideration when the council determining planning applications. A healthy environment can promote and encourage healthy lifestyles by way of good design, green open spaces and opportunities to promote walking and cycling.
- 1.1.7. The Mayor's Transport Strategy sets a target for the percentage of residents doing at least 20 minutes of active travel a day, which for Merton is 70% by 2041. Almost 60% of Merton adults are overweight and diabetes cases are increasing by about 2% per year. One in five children entering reception are currently overweight or obese, a figure which increases to one in three leaving primary school in Year 6

1.1.8. Planning can play a pivotal role in influencing key health determinants, especially towards improving long-term outcomes and addressing health inequalities. Delivering health outcomes will be important for our recovery following the pandemic. The determinants of health shown in the diagram below include:

- Social and economic environment
- Physical environment.
- individual characteristics and behaviours



Determinants of health and wellbeing in our neighbourhoods (Barton and Grant, based on Dahlgren and Whitehead).

1.1.9. The World Health Organisation defines health as ‘a state of social, physical and mental wellbeing and not merely the absence of disease. Merton Council understands that it is possible to make the health and wellbeing outcomes of an area better and recognise that planning has a vital role to play. The council will ensure that development proposals in Merton help to promote active travel choices, physical activity and active aging, enhancing the feeling of safety and security, creation of permeable attractive street frontages and creating spaces where people can come together to relax and socialise.

1.1.10. The recent released Royal Town Planning Institute (RTPI) report, Enabling Healthy Placemaking, called for a greater level of cooperation and collaboration between health, social care and planning professionals to ensure people’s health needs are integrated into the conceptualisation, design and planning stages of new development in the future.

- 1.1.11. Following a call for evidence, the Royal Town Planning Institute (RTPI) in September 2019, this research explores local, national and international planning practices enabling the creation and delivery of healthy places. The report highlighted cooperation between public health, social care and the planning profession is essential. Innovative partnerships, communication and adequate resourcing often underpin effective models of cooperation which in turn leads to successful project implementation.

Health and climate change

- 1.1.12. Climate change is also a public health emergency – climate change impacts health directly through extreme weather condition such as floods and heatwaves. In directly through disruption to natural systems (changing patterns of disease), social systems (forced migration) and the interaction between the two systems. In the UK, the effects of climate change will not be felt equally and are likely to increase health inequalities. However, there are significant health opportunities in the response to climate change. Many of the solutions to address climate change, such as promoting more active travel (walking, cycling and other sustainable travel modes) and health sustainable diets (good eating habit/growing our own food) are inventions that also brings benefits to health.

20 Minute neighbourhoods – Health and wellbeing benefits

- 1.1.13. Planning Practice Guidance (PPG) highlights the importance of promoting access for the whole community. The National Planning Policy Framework (NPPF) recommends that local authorities should consider opportunities for people to live healthy lifestyles including planning for an environment that helps promote active travel and physical activity. Good quality infrastructure encourages walking, cycling and the use of public transport which makes it easier for people to choose more active travel which supports individual health choices and helps prevent weight related illnesses, including diabetes and cardiovascular disease.
- 1.1.14. There is widespread recognition that the places where people live are major influences on their wellbeing. There are economic, environmental, health and social benefits of 20-minute neighbourhoods. The Town Country Planning Association (TCPA) has produced ['20 Minutes Neighbourhood, Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England'](#) a guide in creating and transforming areas into these neighbourhoods.
- 1.1.15. The 20-minute neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day – shopping, schools, community, healthcare facilities, places of work, green spaces and more.
- 1.1.16. Every community has its own context and aspirations for the future. Any plans to create a 20-minute neighbourhood will be based on what the local diverse community (including

children and young people, ethnic minorities and disabled people) wants. However, the following characteristics, or ‘ingredients’, are likely to be part of the mix:

- Diverse and affordable homes
- Well-connected paths, streets and spaces
- Schools at the heart of communities
- Good green spaces in the right places
- Local food growing
- Keeping jobs and money local
- Community health and wellbeing facilities
- A place for all.



Town and Country Planning Association (TCPA) 20 Minutes Neighbourhood features

Active Design

1.1.17. [Active Design](#) principles support National Planning Policy Framework (NPPF). Many Active Design Principles are already embedded within overlapping disciplines related to open space and landscape, transport, access and design.

1.1.18. Embedding Active Design Principles into the design and layout of a development at an early stage will meet a number of planning, transport and health objectives in an integrated and co-ordinated manner. This can assist in providing a smoother and quicker route through the planning application process and can help build support from neighbours and local communities for proposals resulting in more positive outcomes for applications. Our local plan design policies have embedded Active Design and other recognised design principles.

Healthy Streets Approach

1.1.19. The aim of [Transport for London Healthy Streets Approach](#) is to help create a vibrant,

successful city where people can live active, healthy lives. The Healthy Streets Approach seeks to make our neighbourhoods a healthier, more sustainable, safer and more connected. The easiest way for most of us to stay active is by walking or cycling as part of our daily travel. Several policies in the Local Plan seek to deliver and have incorporated the Healthy Streets Approach such as, the transport, design and green infrastructure. Our local plan has embedded Health Street Approach throughout.



Transport for London: Healthy Streets Approach indicators

Health and improving air quality.

1.1.20. The government's [Clean Air Strategy \(2019\)](#) highlights that active travel such as, cycling and walking creates less pollution. It says that there are well understood health co-benefits from active travel including greater fitness and improved mental health, as well as lower risk of obesity, heart disease and lung disease. In addition, active travel reduces traffic congestion, itself a major cause of air pollution. The Mayor of London's Health Inequalities Strategy states that the Mayor wants London to be a place where our surroundings the places we live, work and play supports good health. The Mayor's key ambition is for London to have the best air quality of any major global city.

1.1.21. [Merton's Air Quality Action Plan \(AQAP\)](#) has been produced as part of our duty under the

London Local Air Quality Management statutory process and outlines the action we will take to improve air quality in the London Borough of Merton between 2018 and 2023 for example:

- To provide guidance to developers on the impact of development on air quality and ensure that approved schemes include effective mitigation and maximise the opportunity to improve infrastructure for sustainable transport options.
- To continue to work with schools, parents and students to improve awareness of air quality and to optimise parents' and children's desire and opportunity to adopt sustainable travel options.

1.1.22. The local plan seeks to reduce the impacts of poor air quality in an integrated way, through a number of policies including P13.11 *Improving Air Quality and Minimising Pollution* which seeks to ensure that local environmental impacts of all 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.

Dementia Friendly Merton

1.1.23. Since the G8 dementia summit, 'Global action against dementia' in 2013, there has been a national movement toward developing dementia friendly environment. Over the years there have been several pilot projects across the UK (United Kingdom) with the aim to make towns and cities more accessible and understandable to enable people with dementia to live more independently for longer.

1.1.24. According to the GLA (Greater London Authority) Population and Household Projections (2016), by 2030 the number of people aged over 75 is predicted to increase by 11% in Merton. With more people living longer there is also an increase in older people living alone and people living at home with long term physical and mental conditions such as dementia. There are an estimated 72,000 people living with dementia in London (850,000 people in the UK). If current trends continue, there will be a 40% increase in the people living with this condition by 2025. It is estimated that circa 2,000 people are living with dementia in Merton.

1.1.25. Merton Council is an active member of [Merton's Dementia Action Alliance \(MDAA\)](#). The DAA partners includes shops and other businesses, banks, Public Health professionals, the London Fire Brigade, Metropolitan Police Service (MPS) and the leisure industry. Merton Council has been recognised for the work we are doing in our aim to be a dementia friendly borough and has been awarded the status of 'Working towards Dementia Friendly' status by the Alzheimer's Society and is fully committed to creating. Dementia Friendly communities.

- 1.1.26.** A Dementia friendly borough will consider transport, housing, health services, culture, and social integration through the lens of dementia, with the aim that all those living with dementia in Merton should be empowered and supported to live well. It is recognised that well designed local environments can positively have a substantial impact on the quality of life and on health and wellbeing. Well designed and well-planned environments and buildings can also help also someone living with dementia live well for longer. More importantly incorporating dementia friendly approaches into development proposals does not just help people living with dementia but is also beneficial to Merton’s growing ageing population, people with disabilities and families with small children.
- 1.1.27.** Dementia friendly design approaches take existing design best practices and either adapt or strengthens them with a focus on the needs of people living with dementia. These approaches aim to create inclusive environments/neighbourhoods and will help reduce stigma and supported people living with dementia and other health conditions such as autism. Inclusive neighbourhoods go beyond providing physical access and creates solutions that work better for everyone; ensuring that everyone can equally, confidently and independently use buildings, transport and public spaces. An inclusive environment is one which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people.
- 1.1.28.** There are several practical guides that provide to help developer incorporate dementia friendly approaches. We recommend that developers have consideration to The Royal Town Planning Institute (RTPI) practice guide [‘Creating better environments for people living with dementia’](#) This guidance provides practical advice on how to incorporate dementia approaches in development proposals. The guidance also provides case studies of development schemes and how developers worked with the Alzheimer Society, Help the aged and other organisations.
- 1.1.29.** Another useful tool for developers is [‘The Place Standard’ toolkit](#). This tool was developed by the Scottish Government, NHS (National Health Service) Health Scotland, Architecture and Design Scotland. It is used by many local authorities as a framework for consultation on development, however it can be used by developers to assets proposals.
- 1.1.30.** Halsall Lloyd Partnership architects and designers have produced two guides promoting action research into design for dementia, working in partnership with Liverpool John Moores University, the Building Research Establishment (BRE) and other partners. [Volume 1: Design for Dementia](#), a guide with helpful guidance in the design of exterior and interior environments. [Volume 2: Design for Dementia, Research Projects](#), outlines the research projects and describes the participating approach.

- 1.1.31.** We recommend that developers consider the above and other guidance produced by the architectural, urban design and health organisations that provide guidance on creating dementia friendly homes and environments. We would also recommend that developers seek advice from Alzheimer’s Society and Merton’s Dementia Hub on incorporating dementia approaches in their development proposals at an early stage.

Policy HW2.2: Delivering healthy places.

The council require development proposals to improve and promote strong, vibrant and healthy communities.

- a. The council will require development proposals to:
- i Contribute towards the health priorities of Merton Health and Wellbeing Board and partners to help reduce inequalities including health, across Merton.
 - ii Incorporate the Transport for London (TfL) Healthy Streets Approach as part of development proposals in accordance with the design, housing, environment, economy and other policies in this plan that address the wider determinants of health and improve quality of life.
 - iii Encourage opportunities for food growing such as allotments, community gardens and other innovative food growing spaces as part of development proposals.
 - iv Incorporate Sport England and Public Health Active Design principles as part of development proposals.
- a. The council will:
- i Use the Healthy Streets Approach to priorities health and wellbeing in planning decisions.
 - ii Require all developments in Merton of 150+ residential units or over 10,000m² non-residential development to carry out a Health Impact Assessment (HIA).
 - iii Require a HIA for developments of over 50 homes in areas identified by the Ministry of Housing, Communities and Local Government (MHCLG) Indices of Deprivation or identified in Merton's Joint Strategic Needs Assessment (JSNA) as an area of health priorities.
 - iv Require a Health Impact Assessment for the following developments:
 - Cumulative impact - proposed development is in an area with two or more other substantial developments (referable to the Mayor of London) are planned or started.
 - Major development in areas of poor air quality for example Air Quality Focus Areas
 - If one or more hot foods takeaways are proposed.
 - New educational, health facilities or publicly accessible open space are proposed.
 - In line with Policy DM TC 7.11, manage and monitor proposals for new hot food takeaways found within 400 metres of the boundaries of a primary or secondary school to promote the availability of healthy foods. Where any development proposals involving hot food takeaways are permitted, the council will require the operator to achieve and operate in compliance with, the Healthier Catering Commitment standard.

Justification

1.1.32. Merton is considered a healthy borough when compared to other London boroughs regarding health and wellbeing. However as identified in [Merton's Health and Wellbeing Strategy](#), a different picture emerges especially when it comes to health inequalities. The west of the borough (Wimbledon and Raynes Park neighbourhoods) in general tends to be healthier, more physically active, have higher levels of educational achievement and earn more money. Other neighbourhoods (Mitcham, Colliers Wood and Morden neighbourhoods) have higher levels of health inequalities, less physically activity, have lower educational achievement and tend to earn less money. There is evidence that creating healthy environments could create economically thriving spaces that would add value to development proposals for example:

- Increase trade by 40% when places are made more attractive for walking.
- Commercially: 80% retail sales when places are easier and more attractive to walk around

Hot food takeaways

1.1.33. According to [Joint Strategic Needs Assessment \(JSNA\): The Merton Story](#) produced by Public Health Merton and Public Health England the percentage of Year 6 (aged 11) children in Merton identified as obese is 21%; this figure is higher than the national average (19%). Access to fast food takeaways may influence the ability of our children to adopt healthy lifestyles and may potentially undermine healthy eating initiatives which are place in several schools in Merton.

1.1.34. The council will look to create and promote healthy food environment in Merton by increasing the availability of healthy food and limiting unhealthy options. As such, and in line with line with Policy DM TC 7.11, when considering new development proposals for fast food takeaways located 400 metres from the exit and entrance of an existing or proposed school the council will have regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of hot food takeaway outlets and healthy eating initiatives taking place at the school.

1.1.35. The council fully supports the Mayor of London Healthier Catering Commitment (HCC) and with Merton Public Health will working with businesses (including new businesses) that serve and/or sell food to help improve their food offer. We will encourage all new food establishments in Merton to sign up to the HCC.

Health Impact Assessments (HIA)

- 1.1.36.** The council recommends that a Health Impact Assessment (HIA) is carried out at an early stage of a development proposal. HIAs are designed to consider whether a development proposal might reinforce health inequalities and inadvertently damage people's health or have positive health outcomes for the local community. Ensuring issues are considered at an early stage in developing planning proposals can help improve both the physical and mental health of the population. Carrying out a HIA during the implementation stage is technically possible but it brings a risk of retrofitting health sensitive solutions to the proposal and is likely to generating more development costs, which could adversely affect financial viability of the development.
- 1.1.37.** HIAs promote sustainable developments that support the creation of strong, vibrant and healthy communities by:
- Considering both the positive and negative health impacts when preparing development proposals and should identify actions to enhance the positive impacts and mitigate the negative impacts. The outcome of these actions should be clearly identifiable within the planning application.
 - Identifying the actions needed to minimise any negative impacts on health and wellbeing of a particular development scheme.
 - Demonstrating that developers have worked closely with communities directly affected by their proposals to evolve designs that take account of the views of the community.
 - Considering the cumulative impact of development, i.e., where several developments are in progress within the local area, especially where this relates to construction, as well as the potential overconcentration of uses in a local area. The combination of several large residential schemes may also have a material impact on access to services and amenities.
- 1.1.38.** The council will require the HIA to prove how it has informed the development proposal, any later changes made to the proposal and how Merton's health and wellbeing priorities have informed the proposal. It is recommended that before carrying out a HIA that developers seek advice from the council.



08. INFRASTRUCTURE

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Strategic Policy IN6.1 Infrastructure

We support the provision and improvement of infrastructure across the borough and will work with relevant providers to ensure that the necessary infrastructure is secured to support growth in the borough over the plan period. We will:

- a. Expect new development to identify, plan for and provide any necessary infrastructure and require that, where necessary, infrastructure should be completed prior to occupation.
- b. Work with service providers and partners to enable them to deliver the provision of services and facilities for the projected population growth, especially in areas of significant new homes and areas of deficiency.
- c. Encourage dialogue between service providers and developers. Where appropriate opportunities arise, the co-location of services and joint delivery of infrastructure by service providers will be supported.
- d. Support the delivery of high-quality, high-speed and reliable digital infrastructure to enable the expansion of electronic communications networks, which include full fibre broadband connections and next generation mobile technology. Development proposals will be expected to provide digital connectivity infrastructure in accordance with London Plan Policy SI6.
- e. Support the provision of emergency services and facilities as required by emergency service providers.
- f. Work with partners to facilitate the delivery of sport, recreation and play facilities and to encourage the shared use of sites and spaces.
- g. Expect infrastructure provision to be in keeping with the council's net zero carbon targets.

Justification

- .1.1. The infrastructure needs for Merton will be primarily to support the additional housing required over the Local Plan period. We have identified strategic priorities for health provision, education, transport infrastructure, digital infrastructure, water, wastewater and sewerage provision and supporting future needs of the emergency services. Where there is an infrastructure capacity problem, we will require developers to fund appropriate improvements and where necessary, ensure improvements are completed prior to occupation.
- .1.2. The council will continue to encourage service providers and developers to interact with each other - pre, during and post planning application stage. This is to ensure that all necessary infrastructure can be identified and planned for and that where an opportunity arises for services to be co-located and jointly delivered, this can be done with minimal interruption to local residents and businesses.
- .1.3. In accordance with national guidance on planning obligations, we will require new development to provide or fund local infrastructure improvements. The Community Infrastructure Levy will be applied as appropriate, alongside other investment, to help deliver infrastructure. Site-specific planning obligations will also be used to secure delivery of infrastructure needs arising from development.
- .1.4. In order to support growth in the borough, the council will safeguard and improve essential social, physical and green infrastructure and work in partnership with service providers to ensure the delivery of the additional infrastructure. The potential and predicted infrastructure requirements for the Local Plan are identified in the Infrastructure Delivery Plan 2021 (IDP).
- .1.5. The IDP sets out the infrastructure needs for Merton over the lifetime of the Local Plan, through an analysis of current provision and the consideration of anticipated population and housing growth. The Infrastructure Delivery Schedule provides a list of infrastructure projects that have been identified for delivery within the first five years of the Local Plan, in addition to a number of longer-term projects. The council will continue to work with infrastructure partners, providers, stakeholders and the community to identify and update requirements for the provision of infrastructure and services throughout the borough. The council will also seek to coordinate infrastructure delivery where it is appropriate to do so, while protecting local amenities and environmental quality.
- .1.6. In line with the London Plan, the relationship between green and social infrastructure is considered to be important in Merton, particularly given the ambition to create healthier places for all. We are committed to ensuring that there is adequate provision of community, social and open space facilities to improve the quality of life for residents. Further policies on social and community infrastructure and sports and recreation

facilities are provided in Policy IN6.2 and IN6.3 and policies on open space and green infrastructure are considered in Chapter 8.

- .1.7. Ambitious net-zero carbon targets have been set of 2030 for the council and 2050 for the borough, designed to achieve a step-change in our actions to reduce emissions and adapt to the impacts of climate change. The [Merton Climate Strategy and Action Plan](#) recognises that the three major transitions to the economy, to building and energy and to transport all require substantial changes to infrastructure to be in keeping with emerging national and regional policies such as the London Mayor's [1.5 degree Action Plan](#), the National Government's [Clean Growth Strategy](#) and the views of the [National Infrastructure Commission](#).

Digital Infrastructure

- .1.8. Advanced, high-quality, high-speed and reliable communications infrastructure is essential for economic growth and social wellbeing. As such, the council supports the promotion and delivery of full-fibre or equivalent digital infrastructure. Future digital connections should be provided with a focus on affordability, security and resilience and should provide access to services from a range of providers.
- .1.9. Ofcom currently defines superfast broadband as being a minimum download speed of 30 megabits per second (Mbit/s), which is a measure of data transfer speed. High speed broadband can help businesses, through increased efficiencies, helping to drive jobs and economic growth. It can also help residents to access information, products and services more easily.
- .1.10. Merton has some areas with low or poor digital connectivity. According to [Ofcom's Connected Nations Update: Summer 2020](#), 2% of premises in Merton are unable to receive a minimum download speed of 30Mbit/s. We seek to improve this, and make Merton a digitally inclusive borough, by encouraging the expansion of digital infrastructure into areas where there are currently gaps in connectivity. This includes industrial areas across Merton, which historically have had poor connectivity. Applicants should work with the council and broadband delivery partners to find appropriate solutions to deliver broadband to new and existing residents and businesses.
- .1.11. We are also supportive of the provision of free publicly owned and available Wi-Fi in public realm areas. Fast and reliable digital infrastructure should be accessible to all; it helps support the way that people live and work, helps digital and creative industries to thrive and promotes innovation.
- .1.12. Operators should demonstrate through the planning process that equipment will operate within the International Commission on Non-Ionizing Radiation Protection guidelines for public exposure.

- .1.13. It is important to ensure that the installation of digital infrastructure, together with any necessary enabling works, will not result in unacceptable damage to visual amenity or harm to environmentally sensitive features or locations. Specific design requirements for digital infrastructure are set out in Chapter 5 – Design.

Water and Wastewater

- .1.14. To accommodate the expected population and housing growth across the borough, the council is supportive of improvements and upgrades to water supply and wastewater services, to contribute to security of supply.
- .1.15. The council will work with the water and wastewater providers to seek to ensure that there is adequate water supply, surface water, foul drainage, wastewater infrastructure and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off-site to serve the development and that the development would not lead to problems for existing users. In some circumstances this will necessitate that developers carry out appropriate studies to ascertain the effect proposed development will have on the existing infrastructure. Overloading of the system will not be permitted. Where there is a capacity problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development. An exception to this may be where the water company has improvement works programmed in that align with the completion time of the development.
- .1.16. Thames Water and SES Water will work with developers and the council to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.
- .1.17. Developers are encouraged to contact the water and wastewater companies as early as possible to discuss their development proposals and intended delivery programme to assist operators with identifying any potential water and wastewater network reinforcement requirements.
- .1.18. Where appropriate, planning permission for development which results in the need for off-site infrastructure upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. Where there is a capacity constraint, phasing conditions will be used as appropriate to ensure that any necessary infrastructure upgrades can be delivered ahead of the occupation of the relevant phase of a development.
- .1.19. The council is supportive of improvements to water supply or wastewater facilities, to ensure adequate long term water supply and wastewater management throughout the borough.

Gas and electricity

- .1.20. We will continue to work with utility suppliers, and expect developers to do the same, to ensure that the safe and secure supply of utilities such as electricity and gas is not compromised, as we transition towards a low carbon energy supply.
- .1.21. It is estimated that gas is currently responsible for around 40% of greenhouse gas emissions in Merton, mostly from heating residential properties. Whilst greenhouse gas emissions from electricity production are [predicted to fall substantially](#), there are [limited options](#) to reduce emissions from gas. Until a national strategy to decarbonise the gas grid has been developed, the council will support activities to move away from natural gas and towards electrification and other forms of low carbon heating and cooking. This is likely to result in a reduction in demand of up to [1TWh gas per year by 2050](#), in accordance with GLA zero carbon pathway modelling.
- .1.22. Demand for electricity is likely to increase over time, mainly due to a transition away from gas heating and cooking towards electric heating, and an increase in uptake of electric vehicles. The additional demand is estimated to be around [50GWh/year by 2050](#) (GLA zero carbon pathway modelling), but is uncertain and is influenced by the extent to which local renewable energy and energy storage is installed (e.g. solar PV and battery technology), and the roll out of smart technologies which serve to actively manage the peaks in electricity supply.
- .1.23. National Grid Electricity Transmission (NGET) owns and maintains the electricity transmission system in England and UK Power Networks owns the electricity distribution network. National Grid Gas (NGG) owns and operates the high pressure gas transmission system across the UK, whereby gas leaves the transmission system and enters the distribution networks at high pressure.
- .1.24. Southern Gas Networks owns and operates the local gas distribution network in Merton. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply.
- .1.25. National Grid's underground electricity transmission cables cross through Colliers Wood and Mitcham. In addition, the National Grid's high voltage overhead electricity transmission lines run through the borough along the River Wandle through Colliers Wood and Mitcham. Three of the proposed Site Allocations (CW5, Mi1 and Mi16) contain or are within close proximity to the National Grid Infrastructure. Potential developers of sites with overhead lines should be aware that it is National Grid policy to retain existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.

- .1.26. We are supportive of working with UK Power Networks to explore the extent to which the electricity distribution network requires upgrading; and the approach needed to minimise cost and disruption.
- .1.27. Developers must take into account the location and nature of the existing electricity transmission equipment when planning developments. Guidance is outlined in [National Grid's "A Sense of Place"](#) guidelines on how to create high quality development near overhead lines.

Transport

- .1.28. Merton's emerging Climate Strategy and Action Plan recognises that a wholesale change in the way we travel in Merton is required to reduce greenhouse gas emissions from petrol and diesel vehicles, which are estimated to account for 19% of greenhouse gas emissions in the borough. By 2050 virtually no petrol and diesel vehicles will use Merton's roads. To support a major increase in cycling and walking, a reduction in the use of private vehicles and a shift to electric vehicles and an integrated cycling, walking and electric vehicle charging network will take place.
- .1.29. Public transport accessibility is not evenly spread across the borough and more deprived areas such as parts of Mitcham and Morden neighbourhoods currently have lower levels than some of the western areas of the borough. We will continue to work with the relevant public transport partners, including Transport for London and Network Rail to deliver better transport services, as identified in the Infrastructure Delivery Plan and improve accessibility and connectivity. Refer to the Transport policies in Chapter 17 for further details.

Sport, Recreation and Play

- .1.30. The following evidence base documents have been published relating to the sporting and recreation infrastructure needs in the borough. These documents support the Local Plan and should be referenced for all relevant planning applications.
- The Merton Green Infrastructure, Biodiversity and Open Space Study 2020.
 - The Merton Playing Pitch Strategy 2019.
 - The Merton Indoor Sports Facility Study 2020.

Policy IN6.2

Social and Community Infrastructure

We place a high priority on the provision and improvement of social and community infrastructure. It is essential to support those currently living, working and visiting Merton and to ensure future changes can be accommodated. These places can be the heart of local communities and they are important to ensure residents have a high quality of life. We will:

- a. Support and encourage the most effective use of social and community infrastructure, to support the changing priorities and needs in the borough.
- b. Require any proposals involving the loss of social and community infrastructure to clearly demonstrate:
 - i. that the loss would not create, or add to, a shortfall in provision for the specific use, through providing a Community Needs Statement; and
 - ii. that there is no viable demand for any other social and community infrastructure use on the site, through providing marketing and vacancy evidence for a period of at least 12 months, unless it forms part of a wider public service transformation plan.
- c. Consider other uses through redevelopment, where the council is satisfied that the evidence in (b) has been provided and the change of use away from the social and community infrastructure use has been justified.
- d. Support and encourage the multi-use of social and community infrastructure.
- e. Support proposals for new, or extensions to existing, social and community infrastructure where:
 - i. it provides for an identified need.
 - ii. it is of a high quality and inclusive design providing access for all.
 - iii. it is provided in multi-use, flexible and adaptable buildings or is co-located with other social infrastructure uses, where practicable.
 - iv. it is accessible by a range of transport modes including walking, cycling and public transport.
 - v. appropriate access, parking and cycling facilities are provided, relative to the location and scale of the development; and
 - vi. the use(s), including hours of operation, would not unacceptably harm the amenities of the surrounding area.

Health

- f. Support the provision of new or improved healthcare facilities in the borough, working in partnership with Merton's Clinical Commissioning Group (CCG) and NHS England to meet the needs of Merton's projected population growth, especially in areas of regeneration or areas of deficiency.

- g. Support the aim of improved access to primary health care facilities, which could extend GP surgery hours and support the re-use of social infrastructure and the re-location of services, wherever possible.
- h. Support the principle of a new Health and Wellbeing Community Hub in Mitcham.

Education

- i. Support proposals for new primary and secondary schools, or for the extension or expansion of existing schools including Special Educational Needs (SEN), where they help to deliver the council's agreed strategy for provision of additional state-funded school places in the borough and where they meet the requirements set out in the London Plan education policy S3B.
- j. Resist proposals involving the loss of a state-funded school either in use, or previously in use, unless the council's agreed strategy for school places has identified the site as surplus and its development for other uses would contribute to improvements in the delivery of school places in the borough.

Justification

- .1.31. Taken as a whole, social and community infrastructure covers a wide variety of uses. These include community and affordable meeting spaces, libraries, places of worship, education, youth services, childcare and early years, health and social care, services for the elderly or disabled, sport, recreation, informal play spaces, emergency services and other criminal justice or community safety facilities. This list is not intended to be exhaustive and other uses can be included as social and community infrastructure.
- .1.32. These places can be publicly or privately funded or run by charities, free at the point of delivery or paid for. There are a variety of different needs for social and community infrastructure at different stages of people's lives. These types of infrastructure also play an important role in developing strong and inclusive communities by providing opportunities to bring together different groups of people.
- .1.33. Many of these services are also a major source of employment in Merton; civic and government functions such as schools, the NHS, the fire brigade and other local government sectors are large employers in Merton with a range of jobs in terms of salaries and skills.
- .1.34. The coronavirus (COVID-19) pandemic has highlighted just how important social and community infrastructure is to the local community. The impact of the lockdown on mental health could lead to a longer-term erosion of people's physical health and affect people who have previously not experienced poor mental health. While we do not yet know the full impact that covid-19 has had on our local communities, it is essential that all new and existing residents in Merton have access to social and community infrastructure, to ensure a good quality of life. The council will continue to work closely with its partners, such as the NHS, to ensure that the recovery after covid-19 is prioritised for the health and wellbeing of our residents.
- .1.35. Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97 of the NPPF and considered against the requirements of London Plan Policy S5. Further policies on these facilities are provided later in this Chapter in Policy IN6.3.
- .1.36. Where appropriate, the use of S106 or planning conditions will be used to ensure delivery of required infrastructure in the borough.

Use Classes Order

- .1.37. In 2020, Government introduced successive statutory instruments and changes to the Use Classes Order. These changes include the creation of new Use Classes for Class E (Commercial, Business and Service), Class F 1 (Learning and Non-residential

institutions) and Class F.2 (Local community), and changes to the list of Sui Generis uses (uses that cannot be included in a specific class).

- .1.38. The government's [Explanatory Memorandum](#) states that these changes were “primarily aimed at creating vibrant, mixed use town centres by allowing businesses greater freedom to change to a broader range of compatible uses which communities expect to find on modern high streets, as well as more generally in town and city centres.”
- .1.39. The recent changes to the Use Classes Order allow some premises to change uses without planning permission e.g. nursery or health centre to a shop, café, restaurant. Merton is supportive of the principle of greater flexibility for what business and community spaces can be used for, however we will also seek to minimise any unintended harm that flexible proposals could bring to the local amenity of existing residents and future users.
- .1.40. The council will assess planning applications in line with this policy for any proposals that involve changes to, or a loss of social and community infrastructure. Planning conditions or obligations may be used to ensure no harm to the local amenity of existing residents and future users.

Protect Existing Uses

- .1.41. We will safeguard existing social and community uses unless there is adequate justification for the loss, or provision for a replacement.
- .1.42. Applications proposing a loss will have to demonstrate that the social or community infrastructure use is no longer viable on the site. For the purpose of Policy IN6.2 (b) and (c), a social or community infrastructure use refers to clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law courts, and non-residential education and training centres. Applicants will have to provide the following information:

1. A Community Needs Statement

- .1.43. This is required to clearly set out the reasons why the site is unable to support social and community uses and why the existing use is no longer required on site. Where there is a proposal for a replacement, relocation or consolidation of a use, this document will also need to demonstrate that the needs of the current users of the site have been considered and an appropriate facility can be provided elsewhere.
- .1.44. Applicants are encouraged to discuss the scope and content of the Community Needs Statement with the council at an early stage, preferably through the Pre-Application process, to ensure that the information provided is proportionate to the scale and significance of the proposed change or loss.

.1.45. The following should be covered by a Community Needs Statement:

- The reasons why there is no longer an identified community need for the facility. This may include reasons why a facility no longer meets the needs of its users.
- Details of the current/former service provided on site and if relevant, information on how a better service would be provided elsewhere. This may include information on physical constraints such as access or user requirements.
- Evidence showing that consultation with current/former users of the use on the site has taken place, including feedback on the proposed changes.
- Details on all engagement with the relevant stakeholders that are involved in providing services on site, or that rely on the provision of services on site. For example, the Merton CCG and NHS; and
- Details of any alternative locations that have been identified and assessed as being suitable for co-location.

.1.46. Additional information may be requested by the council, where required.

2. Marketing and Vacancy Evidence

.1.47. This is required to provide an assessment of the continued demand for the existing use and all other suitable social and community uses that could be accommodated on the site. The marketing and vacancy evidence will need to be provided for a minimum period of 12 months and should be carried out in accordance with the criteria set out in the Appendices.

Support Co-Location

.1.48. In line with the London Plan, the council supports proposals that make the best use of land, including the co-location of uses such as schools, colleges, sports and community providers for the wider community. This is particularly relevant where these are located in areas that are highly accessible.

.1.49. We strongly encourage the shared use and co-location of sites, which allows for land to be used more efficiently, assists service providers to work collaboratively and provides for the sharing of maintenance and management costs. Shared facilities that adopt principles from the Healthy Streets Approach and are easily accessible by public transport, cycling and walking will enable greater community inclusion and participation.

.1.50. We will also support the shared use of community sites by different service providers across the public, private and voluntary sector, for example as is being planned at the Mitcham Health and Wellbeing Community Hub.

The Provision of New Social and Community Uses

- .1.51. We will support the development of new social and community infrastructure uses where there are identified gaps in provision.
- .1.52. The location and layout of social and community infrastructure is often determined by the type and use of the site, for example the area reached by a local fire station can be far wider than the area needs of a primary school. We will require new development proposals to ensure that these places are easily accessible and well connected; they should be easily reached on foot, bicycle or by public transport and fully accessible to all parts of the community, including people with a disability and older people.
- .1.53. Social and community infrastructure provides opportunities to develop strong and inclusive communities, contributing to social integration and the desirability of a place. New social and community infrastructure provided as part of major developments should be made available to all residents, irrespective of tenure. Proposals should also include a plan for the management and maintenance of new developments, which may be formalised through the use of planning conditions or obligations. We will also support new proposals which promote and incorporate a circular economy.

Health

- .1.54. A key aim for the council is to encourage healthier communities by improving health outcomes and reducing health inequalities. Appropriate infrastructure needs to be in place to support health and wellbeing, encourage the provision of sport and leisure facilities and support the health and housing services for our community, particularly the vulnerable members of the community.
- .1.55. An ageing and changing population and an increase in long term and complex health conditions places additional demands on health and social care and has implications for the accessibility of services and importance of preventing social isolation. We will continue to work closely with partners including the Merton CCG and NHS England to ensure that primary healthcare will be provided to meet the needs of the changing population.
- .1.56. The Merton Borough Health and Care Estates Strategy 2021 sets out the vision and priorities for healthcare in Merton, to align with the new Local Plan. The Strategy looks to support independence, good health, wellbeing and accessible person-centred care, through a partnership approach across the borough. Although Merton does not have an Acute or Mental Health hospital within its boundaries, the strategic priorities of key partners have been included in the Strategy because they impact on Merton residents who attend those services.

.1.57. The Strategy includes an up-to-date assessment of the following sites in the borough and sets out the future health priorities based on the projected population and housing growth and it has informed the Merton Infrastructure Delivery Plan 2021:

- GP surgeries.
- Primary Care Networks.
- Properties owned by NHS Property Services, Community Health Partnerships, Private landlords and other providers.
- Vacant and underutilised health spaces.

.1.58. One of the key priority areas identified in the draft Strategy is a new Mitcham Health and Wellbeing Community Hub, which is supported by the council. The Merton Borough Estates Group has been working to bring forward plans for a new health and wellbeing space in Mitcham, as part of the priority to bring vacant and underutilised sites back into use.

Education

.1.59. The council will continue to support new and improved childcare and education facilities in response to population changes and borough migration patterns and will work closely with partners and neighbouring boroughs where necessary to ensure that all children in Merton have access to good quality education.

.1.60. The need for school places in Merton for children aged 0-19 years and for Special Educational Needs (SEN) is set out in the council's annual assessment of needs for state funded school places. These needs have been set out in the Infrastructure Delivery Plan and are updated every year to maintain accuracy.

.1.61. State-funded schools include local authority-maintained schools (community, foundation and voluntary aided and controlled schools), Academies and free schools.

.1.62. The shared use of education facilities is strongly encouraged, to ensure the effective use of a variety of community, social, educational and leisure facilities. The sharing of facilities can help to minimise travel distances for users and can provide greater overall social benefits to the local community.

.1.63. Proposals for new or improved education facilities will be expected to be designed to incorporate elements that can be shared or accessed by the wider community, outside of main school operating hours, or demonstrate why this has not been possible. Such uses can include sports and community halls, training and meeting facilities, play spaces, nurseries, children's centres, cultural or youth facilities and sports pitches and multi-use games areas.

- .1.64. Community use agreements may be necessary to ensure community access is properly managed and maintained. Shared access must be safe and adaptable.
- .1.65. Proposals for nurseries and childcare facilities should include access to an outdoor play area, of sufficient size and quality to meet the needs of the facility. This should be located away from, or be screened from, roads and other areas with poor air quality.

Policy IN6.3

Sport and Recreation

We are committed to helping our residents lead healthy and active lifestyles and improve mental well-being, through sport and recreation. We will:

- a. Encourage opportunities for sport, recreation and play.
- b. Safeguard existing sport and recreation facilities, based on assessments of need and capacity.
- c. Support proposals for new, and refurbishment and replacement of existing, sport and recreation facilities on sites that are designated as Open Space in the Policies Map, where the proposal meets Policies O8.2, O8.3 and O8.4.
- d. Require all major residential development likely to be used by children and young people to provide on-site good quality, free-to-use, safe and accessible play spaces for all ages. The amount of play space provided is to be proportionate to the anticipated increase in child population as a result of the proposed development.
- e. Recognise the All England Lawn Tennis Club as being an internationally significant sporting venue.
- f. Ensure that all development proposals that include indoor and outdoor sports and recreation facilities maximise the multiple use of these facilities and encourage the co-location of services for the local community. This should be formalised through Community Use Agreements.

Justification

- .1.66. This policy should be considered alongside London Plan Policy S4 Play and informal recreation and S5 Sports and recreation facilities, in addition to the Green Infrastructure policies in Chapter 8 of this Local Plan.
- .1.67. The provision of parks, play areas, leisure, recreation and cultural facilities helps to encourage healthier, more active lifestyles and improve mental well-being and social interaction. The council is supportive of both formal and informal facilities, to encourage physical activity and deliver a range of social, health and wellbeing benefits to the local community.
- .1.68. We will continue to encourage regular participation in sport and recreation activities, including active travel through well designed public spaces which enable greater pedestrian and cycling movements.
- .1.69. The Merton Playing Pitch Strategy (PPS) published in 2019 provides a strategic assessment of the future demand for playing pitches and sets out the future requirements for sporting needs in the borough. The PPS was carried out in line with national guidance and in collaboration with Sport England and the National Governing Bodies of Sport (NGBs).
- .1.70. The PPS sets out a number of overall recommendations, including a number of sport-specific recommendations for football, rugby, cricket, hockey, tennis, bowls, athletics and water sports, which were agreed in collaboration with Sport England and the NGBs. It also includes an action plan, which is intended to guide the delivery of sports provision over the next 10 years, setting out priority projects, key actions, timescales for delivery and indicative costs by site.
- .1.71. The Merton Indoor Sports Facility Study (ISFS) published in 2020 provides a strategic assessment of indoor sports facilities in Merton, setting out the supply, quality and location of current facilities and considering the future needs.
- .1.72. Both the PPS and the ISFS should be referenced for any proposed development that includes indoor or outdoor sports facilities.
- .1.73. While sport and recreation facilities are generally considered to be appropriate uses on designated open spaces, these can sometimes result in conflict between users of these spaces and there are a number of considerations that need to be assessed. Proposed development will need to be well designed. Applicants must demonstrate that the location of a proposed facility has been fully considered from the beginning of the design process, makes the best use of the land and does not adversely harm any areas of nature conservation or biodiversity.

- .1.74. Sport and recreation facilities must adopt inclusive and accessible design standards to ensure that everyone has the opportunity to take part in sporting activity, in line with relevant best practice and guidance issued by Sport England and other relevant bodies/organisations. The council is supportive of facilities that are inclusive and use accessible design, for example those that enable participation by Deaf and Disabled people.
- .1.75. In line with the Transport policies in this plan, proposed development should incorporate Healthy Streets principles through encouraging walking and cycling, to help achieve active lifestyles and improving mental well-being.

Play Space

- .1.76. Safe and stimulating play is essential for children and young people's mental and physical health. In order to facilitate greater physical activity, it is important that children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision.
- .1.77. Major residential development will be required to provide an appropriate amount of play space on site. In determining the amount of play space required, consideration will be given to the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development. The London Plan child yield calculator is to be used to determine the amount of play space required. The council also supports the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation (2008)', which emphasises the importance of providing spaces for children's play.
- .1.78. The Merton Green Infrastructure Study 2020 includes an assessment of publicly accessible play spaces in the borough, providing maps which illustrate areas of deficiency in access to children's play spaces, broken down for ages 0-4, 5-11 and 12 and over. Applicants are advised to refer to these maps in the early stages of the design process to determine whether a site is considered to be deficient in access to play space.
- .1.79. There are a variety of different types of play spaces that can be provided through new development. Communal gardens and other outdoor spaces suitable for play, including communal amenity space, may be considered to contribute towards play space provision where they have distinct playable elements. However, publicly accessible play space will be preferred where possible, rather than provision being entirely from private space.

- .1.80. Where formal play space is provided it must be free, accessible, and integrated into any wider networks of open space. Where possible, minor developments are also required to provide informal play space.
- .1.81. In line with London Plan policy S4, the council will not support play spaces that are segregated by tenure, as play areas should be accessible to all children.
- .1.82. New play spaces should provide an appropriate range of facilities for different age groups, including young children, older children and teenagers. Other elements such as benches and seating areas should also be provided, to enable adult supervision where necessary. Play and informal recreation areas should incorporate trees and greenery wherever possible, to create a welcoming and enjoyable environment for all.
- .1.83. Formal and informal play spaces are encouraged in all developments.

All England Lawn Tennis Club

- .1.84. The All England Lawn Tennis Club (AELTC) is the home of the Wimbledon Championships, which is a world class sporting venue of national and international significance. The council is supportive of the role that The Championships plays as a tourist, leisure, entertainment and sporting destination in the borough and will continue to support this role and the continued provision of tennis facilities in Merton.
- .1.85. Policy S5 of the London Plan recognises that specialist sporting venues and stadiums, such as the AELTC venue, have a vital role to play in enabling wider access to sport, as well as having an important cultural value.
- .1.86. Further details on the AELTC sites can be found in the Wimbledon neighbourhood policy.

Community Use Agreements

- .1.87. We work with many partners in the delivery of shared services across the borough, including schools, colleges, sports providers and other social and community facilities. The council is supportive of maximising the multiple use of facilities to ensure that residents in all areas of Merton can access good quality sports and recreation facilities.
- .1.88. The Merton PPS 2019 identifies that Community Use Agreements are an important tool in helping to secure tenure for sporting clubs and associations, which can often be problematic without formal agreements in place. The PPS recommends that educational establishments with playing pitches should be encouraged to

secure formal community use of pitches and ancillary facilities through Community Use Agreements.

- .1.89.** The Merton ISFS 2020 identifies that residents in all areas of Merton should have pay and play access to good quality, local, accessible and affordable provision, whether it is a formal sports hall, a community hall or other informal provision. The ISFS recommends that partnership working be used to facilitate increased access to indoor sports facilities across the borough. All new sports facilities on education sites should provide a balance of pay and play and club opportunities that are available for community access. These should be formalised through Community Use Agreements.
- .1.90.** Development proposals that include indoor and outdoor sport and recreation facilities will be expected to provide details showing how the facility will be made available to the wider community. This will be formalised through Community Use Agreements, using conditions or planning obligations, where necessary.
- .1.91.** This is particularly relevant for schools and other social and community facilities but can also apply to commercial schemes. This is to allow and promote access to affordable sports and recreation facilities for all members of the wider local community.

Strategic Policy W6.4

Waste Management

- a. We support the objectives of sustainable waste management set out by the government in the National Planning Policy for Waste and the Mayor's London Plan.
- b. We will continue to work in collaboration with the neighbouring south London boroughs of Croydon, Kingston-upon-Thames and Sutton to maximise self-sufficiency and meet the apportionment tonnages required by the London Plan for south London. The South London Waste Plan sets out the long-term vision, spatial strategy, policies and sites for the sustainable management of waste, and a monitoring framework to assess the success of the policies.
- c. We will increase recycling rates and address waste as a resource, looking to disposal as the last option, in line with the waste hierarchy. To support recycling, the council will require integrated, well-designed waste storage facilities that will include recycling facilities for all new developments where appropriate.

Justification

- .1.93. In March 2012, the London boroughs of Croydon, Kingston, Merton and Sutton adopted the South London Waste Plan as part of each borough's Local Plans.
- .1.94. The South London Waste Plan provides the essential infrastructure to support housing growth in south London by safeguarding existing waste treatment sites, identifying sites and areas suitable for new waste facilities and includes planning policies that both ensure that waste arising in the boroughs are managed within the South London Waste Plan area and that new or redeveloped waste treatment facilities have the least impact on nearby uses and the environment.
- .1.95. In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan's policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste management needs during the 15-year period from 2021 till 2036.
- .1.96. Waste treatment is a strategic planning issue across London and a challenge for all successful urban areas. There is a significant need for new homes in south London which generates the requirement for essential waste treatment infrastructure to support this growth. More than a million people already live in south London and there is a significant challenge in providing such essential infrastructure within a heavily urbanised area.
- .1.97. South London is seeking to meet this challenge by delivering its share of the London Plan's waste policies while meeting the ambitious targets for new homes in the same geographic area. The London Plan sets the target of managing 100% of London's waste within Greater London by 2026 and having zero biodegradable or recyclable waste going to landfill by 2026. It also sets targets for municipal waste, commercial and industrial waste, construction and demolition waste and excavation waste (London Plan Policy SI8).
- .1.98. With significant need for new homes and consequent commercial activity planned across London, the need to provide essential infrastructure such as waste facilities to meet this growth is therefore a regional strategic priority.
- .1.99. Details regarding the provision of suitable waste storage facilities are set out in policy D5.3 'Ensuring high quality design for all developments'.



10. SUSTAINABLE TRAVEL

Strategic Policy T6.4 Sustainable Travel

Merton Council aims to deliver an efficient, safe and sustainable transport system that will;

- Improve road safety outcomes in line with The Mayor's Vision Zero target.
- Reduce traffic congestion and parking dominance on Merton's streets.
- Address public health concerns associated with sedentary lifestyles through more active travel choices.
- Minimise the vehicular emissions that contribute towards climate change and local air pollution.

To do this the council will:

- a. Plan spatial development in accordance the principles for good growth and the "20 minute neighbourhood" approach, to create complete, compact and connected communities that facilitate walking, cycling and the use of public transport and reduce the need to travel by car.
- b. Apply the [Healthy Streets Approach](#) to create accessible streets and public areas where it is safe and convenient to socialise, walk, cycle and use public transport.
- c. Encourage and enable people to choose active travel modes, by implementing a comprehensive network of safe and convenient cycle and walking routes and providing supporting measures such as secure cycle parking, cycle training and route finding.
- d. Work with TfL (Transport for London) and Transport Operators to promote and seek improvements to public transport infrastructure and services.
- e. Seek to manage vehicle use and parking to improve road safety outcomes and reduce impact on the transport network.
- f. Reduce vehicular emissions through supporting a switch to car clubs and electric vehicles and encourage efficient, low-emission freight and delivery trips.

Justification

Transport Challenges

1. The transport network plays a vital role in connecting communities and enabling people to access homes, jobs, education, services and leisure activities. However, accommodating these travel needs creates a number of challenges for the transport network. Traffic volumes in Merton have continued to increase over the last decade and this contributes towards road congestion and results in many of the borough's street environments being dominated by parked cars. Major roads that carry heavy and fast flows of traffic create a noisy and unpleasant environment. They can also act as barriers that physically separate communities and can be intimidating and potentially dangerous for pedestrians and cyclists. Transport is also a major producer of the vehicular emissions that contribute towards climate change and local air pollution.
2. As set out in the Mayor's Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce dependency on cars in favour of active, efficient and sustainable modes of travel. The Mayor has set a target for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041. The specific target for resident's daily trips in Merton is 73% but only 61% of these trips are currently made by sustainable modes, so to achieve this ambitious target the Council will need to work with TfL and other partners to facilitate a significant shift in travel choices and behaviour. The most effective way to achieve this will be through the implementation of a comprehensive package of transport measures that offer improved sustainable travel options alongside measures to better manage car use, parking and deliveries, including through a transition to low emissions vehicles.
3. The transport policies set out in this chapter have cross cutting objectives with other policies in Merton's local plan, in particular those on health and wellbeing, air quality and climate change. Enabling residents to make more active travel choices as part of their daily lives will play an important role in improving health and wellbeing. A shift to sustainable travel modes and lower emissions vehicles will also be vital enable Merton to decarbonise it's activities by 2050 and to reduce air pollution to within legal limits.

Transport and Growth

4. Merton is due to grow significantly over the plan period and integrating land use change with transport will be essential to unlock the potential for growth in a sustainable way that does not have a detrimental impact on the transport network. The London Plan sets out

that to enable sustainable growth requires an ambitious aim to reduce dependency on cars in favour of increased walking, cycling and public transport use. The Mayor's transport principles for good growth are:

- Good access to public transport.
 - High density,
 - Mixed-use developments.
 - People choose to walk and cycle.
 - Car-free and car- lite places.
 - Inclusive and accessible design.
 - Carbon-free travel and efficient freight.
5. Effective spatial planning can reduce the need to travel, particularly by car, by creating complete, compact and well connected neighbourhoods where people can meet their everyday needs within a short walk or cycle. This approach is often referred to as the "20 minute neighbourhood" and represents a 10 minute walk each way, which research shows is distance most people are willing to walk to access daily services (a 10 minute walk equates to a distance of approximately 800m).
 6. The period when new development first becomes operational presents the ideal opportunity to influence travel patterns towards sustainable choices before residents, employees or other visitors have developed established long term travel behaviours. It is therefore essential that development is located and designed to make active and sustainable travel modes a convenient and attractive choice and to reduce reliance on car journeys from the outset.
 7. Focusing and intensifying significant new development around stations and town centres with a good range of transport options can both reduce the need to travel by providing key local services and enable longer distance travel by public transport. Many parts of Merton benefit from good access to public transport, with the borough served by 10 mainline rail stations, London Underground services, London Trams and a network of 28 bus routes. To ensure future development is sustainable whilst maximising opportunities for growth, development opportunities will be intensified around locations with the good public transport accessibility, particularly the opportunity areas of Wimbledon, Colliers Wood and Morden.

Changing Travel Patterns

8. Fundamental changes to the way we shop, socialise and work driven by technological change also have an associated impact on travel behaviour including through increased remote working patterns and more home deliveries. These existing trends have been accelerated by the Covid-19 crisis which resulted in some dramatic shifts in travel behaviours during lockdown periods including a decrease in car and public transport journeys and an increase in local cycling and walking trips. Evidence indicates that the

decrease in car journeys during initial lockdown period coincided with a significant drop in local air pollution which provides a demonstration of the positive improvements that can be achieved by a shift in travel behaviour. Emerging evidence indicates that some of the positive changes to travel behaviour such as increased cycling levels, have been retained. However, there are also indications that traffic volumes have grown again to above pre-pandemic levels, which has the potential to further towards exacerbate the transport challenges of local road congestion and air pollution.

9. Any long term transition to more remote working patterns could have significant positive impact on travel patterns by supporting local services, reducing commuting distances and encouraging more locally based active travel journeys. However, the shift to online shopping, whilst reducing individual shopping journeys, has resulted in a growth of delivery vehicle trips on the network, which will need to be managed more effectively in future to ensure safety and sustainability.

Policy T6.5 Prioritising active travel choices

To encourage and enable active travel choices the Council will require development proposals to:

- a. Design the layout of development sites in accordance with the [Healthy Streets Approach](#) and prioritise safe and convenient access routes for pedestrians, cyclists and those with disabilities.
- b. Ensure sites connect to and integrate well with the surrounding cycle, pedestrian and public transport networks and make suitable contributions towards improving routes where required.
- c. Protect and enhance any existing publicly accessible cycle and pedestrian routes that cross development sites and maximise opportunities to improve public accessibility by providing new connections through sites.
- d. Provide secure, covered cycle parking in accordance with London Plan minimum standards (higher level) and London Cycle Design Standards. Facilities should include provision for charging of electric cycles and a minimum of 5% of cycle spaces should accommodate users of non-standard cycles.
- e. Provide suitable showers, lockers and changing facilities within developments that will provide employment.
- f. Make provision for or a contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes where required.

Justification

Active Travel and Health Outcomes

10. Active travel means making journeys in physically active ways, most commonly by walking or cycling but can also include other modes of travel, such as skateboards and push-scooters. Active travel trips also often form part of a longer public transport journey in order to reach a station or onward destination.
11. Walking and Cycling are environmentally friendly, cheap and reliable forms of transport that provide a realistic alternative to the car for many short trips. Active travel choices are one of the easiest ways to integrate regular exercise into a daily routine. Most of the main causes of early death in London are linked to inactivity, including heart disease and cancer (Mayor's Transport Strategy). Almost 60% of Merton adults are overweight and diabetes cases are increasing by about 2% per year. According to the British Medical

Association 30 minutes of moderate exercise four to five days a week can halve the risk of a heart attack. If every Londoner walked or cycled for 20 minutes each day this would save the NHS £1.7 billion in treatment costs over 25 years.

12. The Mayor's Transport Strategy sets a target for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041. However, only around a third of Merton residents do 20 minutes of active travel a day and worryingly, there has been a slight decline over the last five years. Approximately 30% of residents daily trips are already conducted by walking but less than 2% by bicycle. Merton is a relatively small borough with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling. There is significant opportunity for more cycle and walking journeys, particularly for shorter trips.

Cycle and Pedestrian Networks

13. Pedestrian facilities including footpaths, lighting and crossings are generally provided to a high standard and well maintained. The cycle network has some sections of marked and segregated routes as well as routes on quieter roads and provides links to neighbouring boroughs and into Central London via the Cycleway from Colliers Wood. There are pleasant, traffic free walking and cycling routes through the Borough's parks and open spaces that enable active travel choices by connecting key destinations via convenient shortcuts. In particular the Wandle Trail provides a major active travel route across the borough that connects neighbourhoods including Morden and Colliers Wood. The Council will work with Transport for London, developers and other partners to make further improvements over the plan period with that aim of providing comprehensive cycling and walking networks that enable active travel choice to be made.
14. Development proposals should maximise opportunities to integrate with and improve cycling and walking networks including through financial contributions and/ or providing routes across development sites where appropriate. Development layouts should be designed to give priority to pedestrian and cycle movements and should facilitate access to public transport networks. Pedestrian and cycle routes should be provided to a high standard in accordance with the latest best practice guidance that: provides segregation of cycle and pedestrians or adequate shared use widths; enables use in all Seasons through 24/7 access, suitable surfacing, lighting and better vegetation maintenance and; allows accessibility for all, including wheelchair, pushchair and adapted cycle users through the amendment of barriers such as chicane gates. ([Cycle infrastructure design \(LTN 1/20\) - GOV.UK \(www.gov.uk\)](#)).

The Healthy Streets Approach

15. The council has adopted TfL's healthy streets approach, which puts people's health at the centre of how streets and public spaces are designed, managed and used. Developments will be expected to demonstrate how their proposals will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. New streets should respect and link to the local neighbourhood they serve and provide good connections to community facilities and shops, promote improved travel choice by creating an attractive, permeable, well designed and balanced environment. Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will be resisted.
16. Most public transport journeys start or finish on foot or by cycle, and half of all walking in London is done to or from public transport stations or stops. The Healthy Streets Approach will deliver integrate improvements to the public transport network and streets to provide an attractive whole journey experience that will facilitate mode shift away from the car.
17. Low traffic neighbourhoods are local streets where through traffic is restricted to reduce car dominance and create safe and pleasant street environments that enable cycling and walking. Merton has already in place successful and long standing low traffic neighbourhoods and streets in several areas of the borough particularly around Colliers Wood and South Wimbledon. As part of the Healthy Streets Approach, new development will be expected to adopt the principles of low traffic neighbourhoods and filtered permeability into the site layouts and to integrate with any existing schemes.

Cycle Parking

18. To enable more people to take up or continue to cycle it is important that a sufficient quantity of high quality cycle parking is provided within new developments in accordance with the higher level requirements set out in the London Plan. Cycle parking must be easy to access in a convenient location within a development, at ground level wherever possible. The facilities must be secure, covered and be suitable for people of all ages and abilities, including those who might experience difficulties in lifting a bike or need a specialist cycle. Development proposals should provide full layout drawings prior to the determination of application, demonstrating that it is possible and easy to manoeuvre bicycles both to and within the proposed cycle parking spaces. In places of employment, supporting facilities should be provided including changing rooms, maintenance facilities, lockers and shower facilities (at least one per ten long-stay spaces).
19. Given the contribution of cycling to sustainable travel, the Council will generally be supportive bicycle storage units or boxes in front gardens provided they do not impact on

residential amenity and are designed in sensitive materials as set out in the Design Policies.

20. Mobility vehicle hire services are becoming more mainstream and include dockless electric-bikes and electric-scooters. These innovative services have the potential to provide a cost-effective, sustainable and convenient way of getting around as an alternative to car and public transport use. The council supports these services where they are appropriately licenced and accredited through nationally recognised organisations, ensure safety for users and other road users and do not undermine take up of active travel. To accommodate these services, the council will seek to provide designated dockless parking locations and may require appropriate developments to provide suitable space for this purpose, particularly in town centres where trip generation is likely to be high and alternative available highways space is limited

Policy T6.7 Managing the Transport Impacts of Development

To manage and mitigate any impacts on the transport network in an efficient, safe and sustainable way, development proposals will be required to:

- a. Submit a transport statement or assessment in accordance with latest TfL guidance, which demonstrates that the scale and type of development is appropriate to the transport accessibility of the site and that proposals will not have a detrimental impact on the transport network. Mitigation measures to address adverse transport impacts, including through highways improvements and/ or financial contributions may be required to make the proposals acceptable.
- b. Demonstrate that proposals will not result in any detrimental impact on road safety in accordance with The Mayor's Vision Zero target for road safety.
- c. Develop a Travel Plan where appropriate and in accordance with TfL's latest guidance, which sets out a strategy for managing trips to the development to maximise sustainable travel patterns.
- d. Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
- e. Demonstrate, in accordance with TfL's latest Construction Logistics Plan guidance, how any impacts on the transport network during the construction phase of the development will be managed and mitigated, with priority given to maintaining safe and inclusive access for pedestrians, cyclists and public transport users.
- f. Demonstrate that the proposals and site layout make adequate provision for emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.
- g. Facilitate efficient, safe and low-emission delivery and servicing trips in accordance with TfL's latest guidance on Delivery Servicing Plans

Justification

Assessing Transport Impacts

21. It is important that development proposals fully and carefully assess the projected impacts on the capacity of the transport network at the local, network-wide and strategic level and in relation to all modes of transport. Development proposals will therefore be required to submit either a transport statement where transport impacts are limited or a full transport assessment where the development would be expected to have a

significant or strategic transport impact, according to the latest guidance and [thresholds used by TfL](#).

22. The transport statement or assessment should demonstrate that the scale and type of development is appropriate to the transport accessibility of the site location. Specifically, significant, high density development should be located in town centres and other locations that offer sustainable travel choices and reduce the need to travel by car. Any essential development that would be expected to result in large numbers of freight, servicing or delivery movements particularly by heavy goods vehicles, should be located appropriately on the strategic road network and should incorporate measures to support a transition to low carbon vehicle fleets.
23. The Transport Assessment must identify if transport impacts of a new development are likely to be 'severe' which may lead to the permission being refused unless adequate mitigating measures can be provided to address any adverse transport impacts. Mitigation measures may include financial contributions towards or direct provision of walking and cycling facilities, public transport services and highways improvements. Designs and layouts for new streets or highways improvement schemes should be designed in accordance with the latest best practice guidance and depending on their scale and impact, may be subject to a design review process.
24. The Transport Statement or Assessment should set out how the development supports the Healthy Streets Approach and The Mayor's Vision Zero target for road safety. Vision Zero sets out a strategy to reduce danger on the streets so that by 2041, all deaths and serious injuries will be eliminated from London's transport network. The Vision Zero action plan sets out a strategy for making safety improvements to street design, road speeds, vehicles and road user behaviour.
25. Developments that will be expected to generate a significant amount of journeys to the site by employees, visitors or residents should also submit a travel plan in accordance with TfL's latest guidance. A travel plan is a strategy for managing travel to a site through the introduction of a package of measures that support sustainable travel choices.

Construction Logistics

26. The construction phase of developments can present significant logistic and environmental challenges particularly for large, complex and constrained sites or sites that are located in town centres, residential areas or near schools. Construction is likely to generate a significant volume of trips often by heavy goods vehicles that are widely acknowledged to be involved in a disproportionate number of collisions involving cyclists. Development proposals should therefore seek engagement at an early stage of the planning process and set out proposals to ensure that the construction phase it is

adequately managed and that risks to the operation and safety of the transport network are mitigated. For further guidance please see TfL's latest [Construction Logistic Plan Guidance](#). To ensure road safety and minimise disruption to road users the Council may seek a financial contribution via s106 to monitor operations where they are complex.

Deliveries and Servicing

27. Freight, servicing and delivery vehicles, particularly heavy goods vehicles are a significant source of noise and air pollution, particularly around commercial and industrial locations. Delivery and servicing trips have been increasing in London due to the rapid market evolution in home delivery for a range of services, which has been accelerated as a result of the pandemic. However, low carbon alternatives such as electric vans and cargo bike deliveries have also started to emerge.
28. Where a development is likely to generate a significant amount of movement by goods or delivery vehicles the council will require the development of a Delivery and Servicing Plan in accordance with [TfL's latest guidance](#). A Delivery and Service Plan provides a strategy to improve the safety, efficiency and sustainability of delivery and servicing vehicles through a range of interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours. Development involving delivery focused services should provide adequate onsite electric charging infrastructure and parking to support low carbon fleets including e-cargo bikes.
29. Delivery and Servicing demands can place additional pressure both on the kerbside and within the site boundary which can impact on road safety, parking and vehicular and pedestrian access. It is difficult to modify a site layout post design, so it is essential that at an early stage a detailed servicing assessment needs is made into the type of vehicles and likely frequency, including refuse goods vehicles, taxis, mini vans, cargo e-cycles and motor scooters and appropriate provision made to accommodate this. Provision for loading and servicing should be made off-street and not on the public highway except for very constrained sites where it can be adequately demonstrated not to be a viable option. Where potential overspill can reasonably be anticipated the Council will introduce parking and loading controls to manage kerb space.
30. To help alleviate servicing concerns in relation to refuse, developers are required to provide refuse storage and collection solutions, which are safe, attractive and well-designed. Refuse facilities should be convenient, allow bins to be manoeuvred easily and include sufficient capacity to accommodate increased recycling requirements. For sites with restricted space and access, development proposals should demonstrate that bins will not obstruct adjacent footways or the highway, including by making provision for bins to be relocated to a convenient, suitably sized hardstanding on collection days. The Council will support underground waste collection systems for major redevelopment

schemes provided there is not impact on road safety and where proposed systems are accepted by the Council's appointed waste contractor.

31. Coach and on demand bus services can significantly reduce car journeys by combining single journeys or drop offs thereby reducing congestion, provide a convenient means to convey people to large sporting/leisure events and major transport terminals.

Development likely to attract coach trips will be expected to provide appropriate, managed picking up and setting down facilities. Where this not achievable within the site then alternative approaches need to be explored within the Transport Assessment.

32. Taxis, Dial-a-Ride and community transport services can also form an important part of a sustainable transport mix that provides access to occasional vehicle use and developments should accommodate these modes on site where appropriate to the use and provide appropriate EV charging facilities.

Policy T6.7 Parking and Low Emissions Vehicles

Development proposals should manage car use parking to ensure safety, reduce reliance on car use and support a transition to lower emissions vehicles.

- a. Developments should provide the minimum level of car parking necessary taking into consideration the sites accessibility by public transport (PTAL) in accordance with London Plan parking standards. Developments in areas with good transport accessibility including town centres will be expected to be car free.
- b. All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free.
- c. Financial contributions will be sought for new or enhanced parking controls where they are considered necessary to promote road safety and protect existing residential or business amenity.
- d. Disabled parking should be provided in accordance with London Plan standards, meet design guidelines and be provided with electric vehicle charge points.
- e. Development that provides on-site car parking should provide adequate suitable infrastructure for the charging of electric vehicles, in accordance with London Plan standards as a minimum.
- f. Residential developments that provide parking will be expected to support car club use as an alternative to car ownership, by funding a free trial use package for new residents and by allocating on-site parking space to car club vehicles where appropriate.
- g. Development that provides on-site car parking provision should demonstrate how it will be designed and sustainably managed in accordance with TfL's latest Parking Design and Management guidance.

Justification

Car Parking Standards

33. Vehicles take up a lot of street space and high levels of car ownership and use have resulted in many of the borough's roads becoming congested and dominated by parked cars. Reducing levels of car ownership can free up space on both development sites and on the highway for other more efficient and sustainable uses. The Council will therefore support and apply the approach set out in the [London Plan](#) of restricting car parking provision to restrain car use and will apply the London Plan maximum car parking standards for all use classes.
34. The Council will expect and support car free development for all development proposals in locations that will be well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car free development will also be considered or required in other locations on a case-by-case basis where it can be adequately demonstrated that sufficient sustainable travel choices will be available including where funded improvements to public transport are put in place to raise the Public Transport Accessibility Level (PTAL).
35. Parking requirements for developments in areas of poor public transport outside of CPZs (Controlled Parking Zone) should more sympathetically balance the need to restrain generation of car trips with the impact of overspill parking on neighbouring areas. Development which is likely to increase on-street parking demand in the surrounding area will be expected to undertake parking surveys to assess potential impacts. Where required a financial contribution may be sought to introduce or enhance local parking control measures around the development site.

Permit free development

36. To mitigate highway impacts the Council will ensure that all new development in CPZs (Controlled Parking Zones) is permit free with occupants being ineligible to apply for on-street parking permits. The accumulation of residential conversions to multiple residential properties can place increased pressure on CPZs, so any new dwellings created through conversions, will also be permit free.
37. The conversion of front gardens to parking could be viewed as supporting increased car use in contradiction to car free development. However, new off-street parking for existing dwellings may relieve existing on street parking pressures and release kerb space for other sustainable transport uses and better enable residents to charge an EV (Electric Vehicle), so support a transition to low emissions vehicles. The Council will therefore not object provided proposals do not compromise highway safety and do not contribute to flood risk by ensuring surfacing materials are permeable (see Merton's guidance on [vehicle crossovers](#) and the flood risk policies in this Local Plan and Merton's Sustainable

Drainage SPD for further policy direction and guidance on managing water runoff and flood risk). To ensure proposals for new driveways do not result in proliferation of vehicle use, the parking provision should be limited to one space only and the Council may seek to restrict the household's eligibility to residential parking permits in CPZ areas.

Disabled Parking

38. It is recognised that some disabled people will rely on car travel more than others, whether as a passenger or a driver so disabled persons' parking should be provided for new developments. Disabled persons parking provision should be included within maximum parking provision as set out in the London Plan and not in addition to it.
39. It is essential that disabled parking is accommodated on site wherever possible and is designed to be conveniently located and that the layout provide widened bays with adequate access space in accordance with recognised design standards. Disabled parking facilities should be incorporated within the overall design at feasibility stage. In very exceptional circumstances, where the developer has justified why it is not feasible to provide some or all the disabled parking on site, consideration may be given to accommodating disabled parking for the development on the public highway, subject to an appropriate financial contribution.

Parking Management

40. As people take decisions about whether to own a car and what type of car to purchase, having a comprehensive and coherent parking management approach and pricing structure in place is essential. Where communal car parking facilities are provided a Parking Design and Management Plan should be submitted in accordance with TfL guidance and will be secured through planning condition or appropriate legal agreements.
41. Car parking layouts and spaces should be designed in accordance with the latest best practice guidance to provide adequate space and ensure highway safety. Proposals for the management of parking provision should align with Merton's strategic approach for managing parking including through emissions based parking charges. Specifically, residential parking spaces should not be bought outright but leased on a regular basis (maximum annual). Employee and shopper parking should be charged appropriately. Parking charges should ideally be varied to reflect vehicle emissions with low emissions vehicles such as EVs being charged a lower rate.

Car Clubs

42. Car clubs provide an alternative to individual ownership by allowing members to use a car on a pay as you go basis for occasional trips without having the cost or hassle of owning the vehicle. Survey data ([CoMo UK 2019](#)) indicates that car club members

reduce their private car use and increase their use of sustainable modes. 41% members said they would have bought a new car had they not joined a car club.

43. To reduce levels of car ownership in new development from the outset, the Council will require residential developments to implement measure support car club use to be secured through a legal agreement, including car club membership packages. For large developments the Council may seek on-site dedicated car club bays, particularly in areas of lower public transport accessibility and where there is a lack of existing car club vehicles nearby. Car club spaces should be included within the maximum parking provision as set out in the London Plan and not in addition to it.
44. Car club bays should be convenient, accessible by different operating models/operators and be made available for use by neighbouring residents 24/7. Car Club operators should be part of a nationally recognised Accredited Scheme. CoMoUK provide further guidance on car club requirements for new development.

Electric Vehicles

45. Transport is a major producer of the vehicular emissions that contribute towards climate change and cars produce up 19% of Merton's carbon dioxide emissions as a result of the 600 million kilometres driven each year. Transport emissions also account for approximately 60% of the emissions of Nitrogen Dioxide that contribute to local air pollution. Air pollution concentrations in Merton continue to breach the legally binding air quality limits and are particularly high in proximity to busy traffic routes including in the town centres of Morden, Mitcham, Wimbledon and Raynes Park. Air pollutants are recognised as a major contributor to poor health which particularly affects the most vulnerable in society including children, older people, and anyone with long-term health conditions. 6.5% of mortality in Merton is attributable to the harm caused by poor air quality, equivalent to around 75 deaths every year.
46. To address these issues the Council prioritises a reduction in car ownership and use as a holistic solution that also tackles other transport challenges of congestion and road safety. However, it is recognised that there will continue to be some need and demand for car journeys particularly in areas with lower public transport accessibility. The Council will therefore support a transition to lower emission vehicles specifically to support a reduction local air pollutants, noise and greenhouse gas emissions.
47. The Government are progressing a strategy to significantly increase the uptake of electric vehicles (EVs) over the coming decades and confirmed in November 2020 that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned. The International Council on Clean Transport (ICCT) estimates that the total number of EVs in London will increase by a factor of 30 by 2035 and has assessed that the demand for EV charge points in Merton will increase rapidly during this time.

Demand will be met through a mix of charging solutions to serve different needs of users including fast and rapid chargers and lamp column socket slow chargers in residential areas. New development that provides parking provision must provide electric vehicle charging infrastructure appropriate to the scale and type of development, which will include active provision for at least 20% of spaces and passive provision for all car parking spaces to enable future installation to meet increased demand for EV charging. Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it. For public car parking facilities, such as at retail facilities, EV infrastructure should include conveniently located fast or rapid charging facilities that enable the public to pay to charge their vehicle.

Policy T6.9 Supporting transport infrastructure

To protect existing transport infrastructure and to ensure that new infrastructure is provided to support growth and a low carbon future:

- a. Existing land and buildings used for all transport network functions, including public transport services, will be protected from development, unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary.
- b. Land identified for new transport facilities and other related infrastructure will be safeguarded and secured through planning obligation.
- c. Redevelopment of existing public transport sites must demonstrate how services and access for all users will be protected and improved through the provision of new or upgraded facilities and adequately maintained during the construction phase of development.
- d. Development proposals should support capacity, connectivity and other improvements to the bus network and ensure that buses can operate efficiently to, from and within developments, and provide supporting infrastructure as required.
- e. Development proposals for infrastructure required to decarbonise transport operations will be supported.

Justification

Public Transport Network

48. Public transport can help to reduce dependency on cars by providing efficient and affordable option for journeys that are either impractical or too long to walk or cycle. Parts of Merton benefit from a good public transport provision principally around the town centres but there are other parts of the borough where accessibility levels remain poor and which are more reliant on local bus services. (see PTAL map).
49. Approximately 30% of Merton residents daily trips are made by public transport (TfL data, based on average daily trips for the period 2017/18 - 2019/20). This comprises approximately 9% of trips made by rail, 9% by underground and 12.5% by bus and tram.
50. For an outer London borough south of the river, Merton's public transport network is relatively good, comprising of Northern and District Line Underground services, mainline rail and tram services. However, crowding is a real problem in the peaks on most routes

which can make journey experiences uncomfortable and unpleasant. There are also barriers to accessing public transport for disabled people and those travelling with young children.

51. The Mayors Transport Strategy sets out that significant investment will be needed in the public transport network to improve the customer experience and support anticipated growth without increasing crowding. This policy protects and safeguards existing and potential routes and sites which are required to improve the public transport network and provide the necessary future capacity.

Crossrail 2

52. The South West Main Line into Waterloo that runs through the borough serving Motspur Park, Raynes Park and Wimbledon Stations, is the UK's busiest main line railway which results in severe crowding at peak times. The Mayor's Transport Strategy sets out that proposals for a major new line, Crossrail 2 will be essential to alleviate existing overcrowding and deliver additional capacity from central London to south London and beyond. Crossrail 2 is an infrastructure scheme of national importance which will connect existing national rail lines in Surrey with tunnels from Wimbledon, so will have a significant impact on the borough. The route will increase London's overall rail capacity by 10 per cent and will also reduce demand on the busiest section of the Northern line Morden branch by around 20 per cent.
53. The impact of the covid 19 pandemic on travel patterns has resulted in uncertainties around the future and financing of the scheme, although TfL still expect that the scheme will be required in the long term. An agreement between the Government and TfL in late 2020 has put the scheme development in good order and prioritised safeguarding to protect the latest proposed route from future development until such time as the scheme can be further progressed.
54. Some land within the borough has been identified and safeguarded in the Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015. However, none of the route needed to deliver Crossrail 2, south of Wimbledon Town Centre and the onward connection onto the South West Main Line, are formally safeguarded and some of the site allocations within Raynes Park potentially conflict with sites needed to deliver the route.
55. TfL and the Council will support the Secretary of State to refresh the safeguarding directions. The Council will continue to promote discussion with between TfL and developers potentially affected by the proposals at an early stage, including important sites beyond the current safeguarded limits that may be critical for the delivery of this strategic project.

Underground and Suburban Rail Services

56. The Mayor's Transport Strategy proposes upgrades to the Underground network which will enable faster and more frequent services, as well as improved accessibility and a more pleasant travelling environment. Proposals for improvements to the suburban rail network will include an increase in frequency on the "Wimbledon Loop" from 2 to 4 trains per hour, which will significantly improve the existing capacity and the level of service in parts of the borough with stations on this route.
57. There are also planned upgrades to stations to improve safety, convenience and attractiveness. Proposals to provide step free access at stations will improve accessibility to better enable disabled and older people and parents with young children to travel spontaneously and independently. Improvements to the public transport network will also be integrated with schemes to improve the connecting streets and public realm for cyclists and pedestrians, to provide an attractive whole journey experience that will facilitate mode shift away from the car. Where there are development proposals on sites that include or connect to a station, the Council will seek to secure improvements to accessibility and facilities.

London Trams and Sutton Link

58. Merton is served by London Trams that provides a major orbital link between Wimbledon and Croydon Town Centre via Mitcham. However, the service suffers from over-crowding at peak times and a significant capacity increase is needed to accommodate the anticipated growth in homes and jobs in south London, without reliance on the car. The Mayor's Transport Strategy sets out proposals to upgrade the tram system to improve its reliability and to increase its peak frequency and capacity through longer trams, an expanded tram fleet and new tracking including twin tracking between Morden Road and Phipps Bridge tram stops.
59. A proposed new tram service the "Sutton Link" would create a new, direct and quick route between Sutton and Merton that would offer interchange with the existing tram service. Following public consultation in 2019, TfL's preferred option would serve Colliers Wood via St Helier Avenue, Morden Road and Church Road. Work on the Sutton Link project was paused in July 2020 as it had not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge then the case for taking the scheme forward will be reviewed.
60. Other potential tram proposals include an extension to South Wimbledon and a new tram stop to serve Willow Lane Industrial Estate.

Bus Services

61. Merton is already served by an extensive network of 28 bus services. However, as set out in the Mayors Transport Strategy, significant enhancements to bus services will be required to make the bus an attractive alternative option to replace car journeys, in parts of outer London less well served by public transport. The bus network is more flexible than fixed route public transport so can be more responsive to changes in demand as a result of new development by changing or adding services. Demand responsive bus services are being developed to fill accessibility gaps where conventional bus service would not necessarily be viable. Development proposals should consider whether new or improved bus services and facilities are required to better serve existing and potential demand.
62. The Mayor's Transport Strategy sets out an aim for the TfL bus fleet to emit zero exhaust emissions by 2037 at the latest. To accommodate this existing depot facilities, bus interchanges and stops will progressively need to be adapted to provide the associated electric charging and communication infrastructure.

Cycle and Pedestrian Networks

63. Map X shows Merton's indicative cycle route network to be developed during the plan period. The network will include a mix of types of infrastructure that could include fully segregated or off carriageway cycle lanes and facilities, routes on quiet residential roads and traffic free routes. Some sections already have high quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However, some routes will require significant development or further improvement to achieve the standard required. In particular, some of the town centres including Wimbledon and Morden are dominated by heavily trafficked road systems, which create a barrier to cycling and walking, and will require significant improvements to the road layouts and public realm. Where the proposed cycle network includes links where cycling is currently prohibited and cyclists are required to dismount, the Council will assess whether the route can be enhanced to safely accommodate cyclists including consideration of a "share with care" approach where separate facilities are not feasible. The Council will conduct further work to produce cycling and walking strategies by 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period and will be published on the Council's website. Developers should consult the Council at an early stage to discuss any requirements in relation to the cycle or pedestrian network.

Proposed transport schemes

64. The table below sets out the key transport schemes identified in the Mayor's Transport Strategy and London Plan Policy T3 that are relevant to Merton and are required to deliver an enhanced or expanded travel network and to accommodate growth sustainably. Additionally, a number of locally important proposals are shown. This list is not detailed or exhaustive, so developers should consult TfL's and the Council's latest

Transport Strategies for up to date details of transport schemes proposed in Merton. Where a scheme could potentially be affected by a proposal, applicants should consult with the Council other relevant authorities, including TfL at an early stage to understand the latest status of the scheme and identify impacts and whether any suitable mitigation is possible. Development proposals should identify new sites or routes that are or will be required for local public transport and active travel connections, where appropriate and set them out in a transport assessment or transport statement.

Table x: Indicative list of transport schemes

Proposal Number, Scheme and Location	Proposal Details
TN 1 Crossrail 2	Strategic infrastructure proposal for new underground rail line running across London between Wimbledon and New Southgate/Tottenham Hale with potential ground level links to the wider rail network. For the current status and safeguarding of land see https://crossrail2.co.uk
TN 2 Rail Service Improvements	Enhanced suburban rail services, particularly to improve the frequency on trains on the Wimbledon loop from 2 tph to 4 tph in each direction throughout the day.
TN3 Underground upgrades	Upgrades to Underground Services to improve capacity and quality of service.
TN4 Step free access	Improved station accessibility for all users. Includes Motspur Park in feasibility /design stage (funded). Proposals to safeguard Wimbledon Chase Station redevelopment to ensure step free access can be delivered in the future.
TN 5 Sutton Link – Sutton town centre to Colliers Wood	Proposal for a new tram route (unfunded) between Sutton and Colliers Wood see https://consultations.tfl.gov.uk/trams/sutton-link
TN 6 Improvements to existing Wimbledon to Croydon Tram service	Service improvements including step free access from Dorset Road to Morden Road Tram stop, replacing existing single track with double tracks between Phipps Bridge and Morden Road Tram stops to increase capacity.
TN 7 Other tram improvements	Potential new Tram stop at Willow Lane to enhance public transport access to Willow Lane Industrial Estate. Street running spur extension from Morden Road tram stop. Delivery will require reallocation of road space and local widening secured through negotiation with landowners as opportunities arise.

TN 8 Bus Network improvements	Service enhancements to meet existing and future demand, accessible bus stops and bus stop improvements, bus priority schemes, decarbonisation of the bus fleet and exploration of demand-responsive bus services.
TN 9 Wimbledon Town Centre public realm improvements	Major scheme to improve the public realm and accessibility by cycling, walking and public transport, including improvements to the station. Will involve modification of one-way road system, reallocation of road space and schemes for sustainable management of deliveries and servicing.
TN10 Morden Town Centre, London Road	Re-prioritisation of road space in favour of pedestrian, cyclists and public transport, improved Station access arrangements and public realm improvement and modification of one-way road system.
TN11 Borough-wide walking network	Improvements to the walking network including routes, lighting and crossing facilities.
TN12 Borough-wide cycle network	Development of a strategic network of cycle routes, including new feeder routes to the Cycle Superhighway.
TN 13 Cycle Parking and Hubs	Upgrades of existing cycle parking facilities and secure cycle parking hubs at Wimbledon, Colliers Wood, Mitcham and Morden.
TN 14 EV charging infrastructure	Development of a mix of EV charging infrastructure to facilitate the projected increase in EV ownership.



11. GREEN AND BLUE INFRASTRUCTURE

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Strategic Policy O8.1

Open Space, Green Infrastructure and Nature Conservation

Access to open spaces and green infrastructure plays an important role in the physical and mental health and wellbeing of all people. We aim to ensure Merton remains an attractive and green borough, through the protection and enhancement of open spaces, green infrastructure and the natural environment. We will do this by:

- a. Protecting and enhancing open spaces in the borough including Metropolitan Open Land, parks, other open spaces and areas of nature conservation to provide high quality environments for all residents;
- b. Protecting and seeking improvements to walking and cycling routes to and through green spaces;
- c. Enhancing existing open spaces, green corridors and the natural environment, providing habitats for biodiversity to flourish and expand;
- d. Protecting and enhancing the borough's biodiversity, particularly on sites of recognised nature conservation interest, and supporting the objectives of the Mayor's Environment Strategy;
- e. Increasing green infrastructure across the borough through urban greening;
- f. Enhancing accessibility to our waterways, including the River Wandle and its banks, for leisure and recreational use, while protecting its biodiversity value;
- g. Improving opportunities for our residents and visitors to experience nature;
- h. Promoting healthy lifestyles to encourage physical education and well-being through the use of our leisure centres, schools, open spaces, playing pitches and recreational spaces; and

Justification

- 1.1.1.** The policies in this chapter should be read alongside Chapter 8 Green infrastructure and natural environment and Policy S5 Sports and recreation facilities of the London Plan and the Infrastructure policies in Chapter 5 of this Local Plan. These policies are intended to work together to ensure that Merton's green and open spaces remain a valued asset of the borough and are protected and enhanced.
- 1.1.2.** Merton is lucky to be one of the greenest boroughs in London, with over 1,300 hectares of open space, which makes up 35% of the borough. To ensure there continues to be good quality green spaces for everyone to enjoy, it will be important to protect and enhance the existing open spaces and green infrastructure in Merton. Emphasis will be placed on the protection and long-term management of green spaces and areas of nature conservation, and encouraging improved accessibility to these spaces. Pedestrian and cycle routes across green spaces often form a strategically important part of the borough's cycling and walking networks and many are designated as public rights of way. These routes enable active travel choices by connecting key destinations in the borough via convenient shortcuts and quiet routes away from busy roads. Pedestrian and cycle routes through green spaces should be protected and wherever possible provided to a high standard in accordance with best practice guidance.
- 1.1.3.** The following evidence base documents have been published, which support the Local Plan and should be referenced for all relevant planning applications:
- The Merton Green Infrastructure, Biodiversity and Open Space Study (2020);
 - The Merton Playing Pitch Strategy (2019); and
 - The Merton Indoor Sports Facility Study (2020).

Policy O8.2

Open Space and Green Infrastructure

We place a high value on green infrastructure and open spaces, as they make a significant contribution to the health (including mental health) and wellbeing of Merton residents, contribute to social cohesion and mitigate some of the impacts of climate change. We aim to protect and enhance our open spaces and to improve accessibility to open space. We will:

- a. Protect and enhance the borough's public and private open space network including protecting Metropolitan Open Land (MOL) and designated open spaces from inappropriate development in accordance with the London Plan and government guidance.
- b. Ensure that in accordance with the NPPF, existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
 - i. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - ii. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - iii. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- c. Ensure that development proposals within designated open spaces (which have met the conditions set in part b) above, meet all the following criteria:
 - i. the proposals are of a high quality design and do not harm the character, appearance or function of the open space and;
 - ii. the proposals retain and/or improve public access between existing public areas and open spaces through the creation of new and more direct footpath and cycle path links; and,
 - iii. the character and function of leisure walks are preserved or enhanced.
- d. Require the creation of new publicly accessible open space as part of major development proposals in locations that are deficient in access to public open space and support the creation of new publicly accessible open space in all developments, where suitable and viable.
- e. Expect development to incorporate and maintain appropriate elements of green infrastructure which makes a positive contribution to the wider network of open spaces.
- f. Safeguard existing allotments, and encourage and support opportunities for community run and managed food growing spaces in new developments.
- g. Expect all development to make provision for the long term management and maintenance of open space and green infrastructure on site.

Justification

- 1.1.5.** Open space can be multi-functional; people use green and open spaces for many purposes including exercise, play, food growing, socialising and leisure. Visual accessibility is equally as important as physical access. The protection and enhancement of open spaces enables the provision of areas for active and passive leisure activities, has a positive impact on health and wellbeing, provides opportunities for social cohesion between members of Merton's diverse communities, provides safe pedestrian and cycle routes, provides areas for nature within urban areas and can provide areas for flood mitigation measures. Open spaces and green infrastructure can also play a role in enhancing and conserving the historic environment.
- 1.1.6.** The 2020 Merton Green Infrastructure, Biodiversity and Open Space Study (referred to as the Green Infrastructure Study) provides an assessment of open space quality, quantity and accessibility throughout Merton, including an audit of existing open spaces to determine the likely demand and need for facilities over the lifetime of the Local Plan.
- 1.1.7.** The Green Infrastructure Study identifies that Merton is one of the greenest boroughs in London, with over 1,300 hectares of open space, accounting for 35% of the borough. 21% of this is public open space, slightly more than the 18% in London.
- 1.1.8.** The coronavirus (COVID-19) pandemic has highlighted the importance of having access to green spaces within walking distance of homes. During the pandemic, visits to parks and other green spaces increased across London. It is important to protect and enhance the existing areas of open space in Merton, to ensure that as the population grows, there are good quality green spaces for everyone to enjoy.

Metropolitan Open Land

- 1.1.9.** Metropolitan Open Land (MOL) is strategic open land that contributes to the structure of London. It is afforded the same status and protection as Green Belt land. As shown on the Policies Map, there are 9 designated areas of MOL in Merton, covering over 950 hectares, or 26% of the borough. MOL will continue to be protected from inappropriate development, in accordance with the London Plan and government guidance.

Designated Open Spaces

- 1.1.10.** The open spaces relevant to this policy are designated on the Policies Map. These typically consist of parks, commons, playing fields, play areas, cemeteries and churchyards, woodlands and allotments. We are committed to ensuring the protection and enhancement of designated open space.

- 1.1.11.** Many designated open spaces have existing buildings within them, particularly when associated with leisure and sports facilities. Proposals for new or improvements to existing buildings on open space that meet the criteria in the policy should be of high quality design, and of a scale, height and massing that is appropriate to their setting. Proposals should show how uses are required and linked to the function of the open space and all proposed uses should complement and enhance the function of the open space (e.g. pavilions and changing rooms that are required for playing pitches).
- 1.1.12.** For clarity, the assessment that is referred to in part (b)(i) of this policy is a strategic borough-wide assessment such as the Merton Green Infrastructure Study 2020, the Merton Playing Pitch Strategy 2019, or the Merton Indoor Sports Facility Study 2020, not assessments that are done on a site by site basis.

Improving accessibility to public open space

- 1.1.13.** The Green Infrastructure Study includes an accessibility assessment to analyse areas in the borough that are deficient in access to public open space, play areas and nature conservation, and maps are provided for each. The areas of deficiency in access to public open space are calculated by Greenspace Information for Greater London (GiGL) using their Areas of Deficiency (AoD) data model. Public open space categories are set out in the London Plan and provide a benchmark for the provision of publicly accessible open space, categorising spaces according to their size, facilities and local importance.
- 1.1.14.** Residents in Merton experience high accessibility to Regional Parks (98%) and Metropolitan Parks (99%). There is also a good level of accessibility to District Parks (77%) and Local Parks (72%). There is a notable gap in access to District Parks indicated by a continuous band of deficiency from west to north east through Raynes Park, Wimbledon, Colliers Wood and Mitcham.
- 1.1.15.** The best reflection of deficiency in access to open space is to the Local Parks, Small Open Spaces and Pocket Parks. In these areas of deficiency the lack of open spaces is more evident, although there is some evidence of existing open space which is not publicly accessible. There are some areas (particularly noticeable around Raynes Park) where there are gaps in access to both District and Local Parks. Major developments proposed in these areas will be required to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site. New public access routes should be designed to be accessible by all people. Where necessary, planning obligations may be sought to secure access improvements. Applicants are advised to consult the areas of deficiency maps provided in the Green Infrastructure Study for consideration as part of the design process.
- 1.1.16.** Where necessary, to fund any costs to the council associated with onsite provision of new open space proposed as part of major developments, commuted sums may be negotiated

on a case by case basis and the level of funding sought will be commensurate to the financial burden to the council that would arise due to the open space provision.

- 1.1.17.** A large number of open spaces in Merton are linked by rivers, brooks and smaller open spaces, or are separated from one another by short sections of built development. This can limit the accessibility to and between open spaces. New development in these areas should explore opportunities to enhance the accessibility between these spaces, in line with the principles set out in the All London Green Grid guidance and London Plan Policy SI16(F). Improvements in accessibility should be delivered in tandem with the Transport policies.
- 1.1.18.** It is important to protect and improve the existing links between and across open spaces. These links provide important informal recreational opportunities for walking and cycling, create a safe and pleasant environment, and allow appreciation of attractive landscapes and features of historical significance.

Green infrastructure

- 1.1.19.** Green infrastructure refers to the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems.
- 1.1.20.** All development will be expected to incorporate elements of green infrastructure on site, to enhance biodiversity, contribute to the health and wellbeing of all residents and help mitigate the impacts of climate change. Examples include pollinator-friendly landscaping, tree-planting, green walls, green and blue roofs and rain gardens all of which can have multiple benefits. Reference should also be made to the Local Plan Policies on Biodiversity and Nature Conservation (O8.3), Protection of Trees (O8.4) and Urban Greening (O8.5).

Allotments and Food Growing

- 1.1.21.** Local food growing can help to create healthier food environments, improve food security, promote healthy and active lifestyles and help to improve social and community cohesion. Allotments are areas set aside for food growing and are recognised for their contribution to enabling healthy and sustainable lifestyles. These green spaces not only offer biodiversity and conservation value but also bring recreational, health and social benefits, by allowing residents to grow fresh produce.
- 1.1.22.** The Green Infrastructure Study identifies there are 21 allotments in Merton; 19 of which are Council owned and the other 2 privately owned. It is important that allotments continue to be protected, while new spaces for growing food are also encouraged.

- 1.1.23.** New proposed developments may provide ideal opportunities to incorporate spaces for residents to grow food. This does not have to be in formal allotment areas, but could extend to roofs, walls and balconies or by introducing trees and shrubs that produce food as part of the landscaping. It may be appropriate for areas to be used temporarily for food growing, provided it does not conflict with other policy objectives or land use priorities and does not have an unacceptable impact on the amenity of adjoining areas.
- 1.1.24.** Food growing in schools can also help children's learning and skills, in addition to wider health and wellbeing outcomes.

Policy O8.3

Biodiversity and Access to Nature

We are committed to protecting and enhancing the natural environment. We aim to protect and enhance biodiversity, particularly on sites of recognised nature conservation interest, and to improve accessibility to nature throughout the borough. We will:

- a. Protect all sites of recognised nature conservation interest against inappropriate development that will adversely affect the nature conservation value of the site, and secure measures that enhance their nature conservation value;
- b. Protect and avoid damage to sites of recognised nature conservation interest, populations of protected species, priority habitats and priority species;
- c. Protect Green Corridors from development which may destroy or impair the integrity of the Green Corridor.
- d. Require development to contribute to net gains in biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links.
- e. Require the following mitigation hierarchy to be followed, for development where significant harm to biodiversity is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity:
 - i. Avoid damaging the significant ecological features of the site
 - ii. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - iii. Deliver off-site compensation of better biodiversity value.
- f. Expect all development on sites found in an area of deficiency in access to nature to incorporate appropriate biodiversity elements and habitat features to improve nature conservation, and to improve accessibility to SINC's through site design.

Justification

- 1.1.25.** Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity, through policy and decision making.
- 1.1.26.** We are committed to protecting and enhancing biodiversity, particularly on sites of recognised nature conservation. The protection and enhancement of biodiversity in urban areas such as Merton is important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature. Protecting biodiversity and the wider natural environment can have a variety of significant positive impacts including strengthening wildlife movement and connections, improving health and mental wellbeing of residents, contributing to climate change adaptation and improving quality of life.
- 1.1.27.** For clarity, reference in this policy to ‘sites of recognised nature conservation interest’ include all sites that are designated on the Merton Policies Map as:
- Sites of Special Scientific Interest (SSSI);
 - Metropolitan, Borough or Local Sites of Importance to Nature Conservation (SINC);
 - Local Nature Reserves (LNR); and
 - Green Corridors.
- 1.1.28.** Development proposals which are likely to affect sites that have been designated on the Policies Map as SSSI, SINC, LNR or Green Corridor will be required to demonstrate that such development will not adversely affect the nature conservation values of the site. Any proposals on adjoining sites will also need to ensure and demonstrate that the proposed development will not harm the nature conservation value of the designated site.
- 1.1.29.** In line with the NPPF and London Plan Policy G6, significant harm to biodiversity on a site through proposed development should be avoided. In circumstances where harm is unavoidable, the mitigation hierarchy will be applied. It will be expected that where any mitigation or compensation is required, this will be provided at the equivalent, or better, biodiversity and habitat area and value.
- 1.1.30.** The preservation of existing biodiversity, including wildlife habitats, is strongly preferred over re-provision as any redevelopment of an existing space will necessitate its total loss and replacement with a space that has to be established with plants and wildlife over time; this carries the risk that the replacement space will be less successful than that which it replaces.

Sites of Special Scientific Interest / Special Areas of Conservation – Wimbledon Common

- 1.1.31.** Wimbledon Common is the only SSSI in the borough and this area is also protected by European legislation as a Special Area of Conservation (SAC). The Habitats Regulations require an 'Appropriate Assessment' to be carried out if a plan or project is likely to have a significant effect on Wimbledon Common (either alone or in combination with other plans or projects). This may apply to development projects and this is not the same as an Environmental Impact Assessment. The Natural England website has more information to help decide whether or not a development project requires an 'Appropriate Assessment'.

SINCs

- 1.1.32.** There are 56 SINCs in Merton, covering an area of 833 hectares (22% of the borough). Proposals on, or in close proximity to SINCs should have a positive impact on biodiversity and will be assessed in accordance with London Plan Policy G6.

Local Nature Reserves

- 1.1.33.** There are 15 LNRs in Merton; areas that have been statutorily designated under Section 21 of the National Parks and Access to the Countryside Act 1949. These are places that are considered to be important for wildlife, geology, education and enjoyment by local people. Public access to LNRs is important, provided that people visiting the site will not damage or disturb the wildlife.

Protected species, priority habitats and priority species.

- 1.1.34.** Although Merton is a built-up area in London, it is still home to many protected species and habitats that are valuable to biodiversity. While trees and green spaces provide habitats for many species, buildings can also provide roosting sites for bats and nesting opportunities for birds. Biodiversity should be considered at the early stages of the design process, as the benefits of creating spaces for wildlife also have significant positive impacts for the health and wellbeing of local residents.
- 1.1.35.** Wildlife in the UK is protected under the Wildlife and Countryside Act 1981 (as amended). Applicants should check that wildlife and protected species will not be affected by a proposed planning application. The Natural England standing advice on protected species should be referred to for any development proposal on a site that may impact on a protected species, priority habitat or priority species. Any development that is located within or in close proximity to a SINC or is likely to have an impact on protected species, habitats or priority species, will be required to submit an ecological survey and appraisal. This is to ensure that we can make an informed decision to protect and enhance biodiversity.

- 1.1.36.** Ecological surveys submitted with planning applications should be in line with the Natural England standing advice on protected species and:
- be carried out by an appropriately qualified ecologist
 - be carried out at an appropriate time of year and no later than 6 months prior to the submission of the planning application;
 - use appropriate methods for the species and the area;
 - be carried out early in the design process of a proposal;
 - identify any potential impacts a proposed development is likely to have on the ecology of a site; and
 - recommend suitable mitigation and enhancement measures for the proposed development.
- 1.1.37.** Development proposals must consider the potential impact that lighting, noise or shading may have on biodiversity on and around the site. New proposed lighting should minimise impacts to biodiversity, protected species and priority habitats.
- 1.1.38.** Any works that would affect breeding birds and their nests, such as works of demolition, vegetation removal or site clearance, will need to be done outside the nesting season from 1st of March to 31st July inclusive (in accordance with the Natural England standing advice on wild birds).

Green Corridors

- 1.1.39.** Green Corridors are continuous areas of open space, which link other open spaces to each other, allowing animals and plants to move in and around built-up areas. There are 18 Green Corridors designated on the Policies Map, covering an area of 1,023 hectares (27% of the borough).
- 1.1.40.** We recognise the importance of maintaining and enhancing the network of Green Corridors. These areas effectively create corridors that enable the movement of plant and animals. They allow some animals to undertake movements between different habitats that they require for survival, maintain the presence of some animals and plants in places where they would not otherwise be found, and help to ensure the maintenance of the current range and diversity of flora and fauna, and the survival of important species.
- 1.1.41.** Proposed development on sites in and in adjacent to Green Corridors will need to consider biodiversity, wildlife and green infrastructure elements early on in the design process. This includes considering and mitigating against any potential impacts on biodiversity from elements such as lighting, noise or shading. Lighting can have negative impacts on birds, roosting bats and bats that are feeding or commuting to feeding areas.

Net Gain

- 1.1.42.** Biodiversity net gain is an approach which aims to leave the natural environment in a better state than it previously was. Development proposals should maximise biodiversity benefits and ecological connectivity through ensuring that biodiversity is a key consideration early in the design process.
- 1.1.43.** Development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.
- 1.1.44.** Development proposals should prioritise the inclusion of biodiversity on-site, selecting species for planting that complements that surrounding habitats, maximises benefits to biodiversity and is beneficial to wildlife.
- 1.1.45.** Improvements to biodiversity should not be restricted to conventional habitats but should extend to the increased use of green roofs and green walls. The use of sustainable drainage measures can also have significant biodiversity benefits – refer to Policy F8.8 and the Merton SUDs SPD for further guidance.

Areas of Deficiency in Access to Nature

- 1.1.46.** There is generally good access to green spaces and nature conservation areas in Merton, however some parts of the borough are considered to be deficient in access. For clarity, areas of deficiency in access to nature are areas where people have to walk more than 1km to reach a publicly accessible metropolitan or borough SINC. These areas have been identified and mapped in the Merton Green Infrastructure Study 2020. These maps are regularly updated by GiGL and should be referred to when preparing planning applications.
- 1.1.47.** Major development proposals on sites that are located in these areas of deficiency will be expected to alleviate these deficiencies. We will support improvements in accessibility to SINCs in areas of deficiency through all developments, where this is possible and practical.

Geodiversity

- 1.1.48.** There are no regional or locally important geological sites in Merton. However, there is a site on Putney Heath, approximately 160 metres from the borough boundary in Wandsworth, which is a site of local importance. Development proposals that could have an impact on the geological features of this site should have regard to London Plan Policy G9.

Policy O8.4

Protection of Trees

We are committed to protecting trees and enhancing other features of the natural environment. We will:

- a. Encourage and support the protection of street trees, and secure replacements utilising current technological advancements for the successful growth and establishment of trees;
- b. Ensure that development proposals protect and retain trees, hedges and other landscape features of amenity value, on site and on adjoining land, wherever possible, and secure suitable replacements in instances where their loss is justified;
- c. Expect development proposals, where appropriate, to plant additional trees on site in a coordinated way to maximise the green infrastructure network and to increase the borough's tree canopy;
- d. Use Tree Preservation Orders to safeguard significant trees of amenity value;
- e. Only permit development if it will not damage or destroy any tree which:
 - i. is protected by a Tree Preservation Order;
 - ii. is within a conservation area; or,
 - iii. has significant amenity value.

However, development may be permitted when:

- iv. The removal of the tree is necessary in the interest of good arboricultural practice; or
- v. The benefits of the development outweigh the tree's amenity value.

In circumstances where e) iv. or v. applies, suitable high-quality re-provision of equal value must be provided on site. Where on site provision is demonstrably not possible, as agreed with the council, a financial contribution of the full cost of appropriate re-provision will be required.

- f. Expect proposals for new and replacement trees, hedges and landscape features to consist of appropriate native species to the UK.
- g. Require developers to ensure that bio-security measures are adhered to for trees, shrubs and herbaceous plants to prevent accidental release of pests and diseases.

Justification

- 1.1.49.** Trees, hedges, shrubs and other significant vegetation make an important contribution to the borough's townscape and the quality of life for residents. These elements provide visual and amenity enhancements to the built environment, while also providing much needed habitats for biodiversity. Trees, and in particular mature trees, can help to reduce impacts on air quality and contribute to climate change by capturing and storing carbon dioxide. Trees will continue to play a significant role in adapting to climate change by having a positive impact on reducing flood risk and helping to reduce the urban heat island effect.
- 1.1.50.** The Green Infrastructure Study 2020 identifies that although Merton has an overall tree canopy cover that is greater than the London average, a sustained expansion of tree and woodland planting is important. This is needed to address ongoing biodiversity declines, increase resilience to pests and diseases, increase shade and tackle climate change. The Study identifies the total tree canopy, including in private gardens, covers an area of 1,040 hectares, approximately 28% of the borough. There are different techniques for estimating tree and woodland coverage, but of the total tree canopy: 266.1 hectares (26%) consists of woodlands contained within parks and public open spaces; 15.2 hectares (1.5%) consists of individual woodlands; 116.7 hectares (11.2%) consists of street tree (canopy); and the remainder (61.3%) is found in private gardens, cemeteries and institutional grounds. London's tree coverage is estimated to be 20% and the London Environment Strategy has set a target to increase this by 10% by 2050.
- 1.1.51.** We are supportive of the protection and retention of trees on development sites, as this will help to provide a platform to expand the borough's tree canopy. When considering the amenity value of a tree, we will look at Category A, B and lesser category trees where they are considered to be of importance to amenity and biodiversity, as defined by BS 5837:2012 (in accordance with the London Plan G7C).
- 1.1.52.** There will be an expectation for proposals to also provide new trees on site, to help add to the borough's tree canopy. While it is recognised that individual site constraints may mean this is not possible on every site, applicants will be expected to demonstrate they have considered the provision of new trees as part of their design concepts.
- 1.1.53.** We will use the existing planning mechanisms including Tree Preservation Orders and Conservation Area designations to protect existing trees on private land.
- 1.1.54.** In line with the NPPF and London Plan Policy G7, ancient woodland areas and veteran trees should be protected from development. These are irreplaceable habitats and form a key component of green infrastructure, helping to create resilient and sustainable places to live. Any proposed development in the vicinity of these protected areas should seek guidance prior to submitting a planning application. Further guidance on the protection of

ancient woodland and veteran trees can be accessed via the Forestry Commission or The Woodland Trust.

- 1.1.55.** We consider it important that development proposals are accompanied by appropriate reports and surveys to deal with the impact of the proposals on the existing vegetation. We assess trees within the scope of BS 5837:2012. When applicable, developers will need to demonstrate that they have paid regard to current British Standards such as, BS 5837:2012 'Trees in relation to design, demolition and construction - Recommendations', BS 3998:2010 ' Tree Work – Recommendations' and other relevant documentation such as the Arboricultural Advisory and Information Service's 'Arboricultural Practice Note 12'.
- 1.1.56.** New development should be designed positively to integrate existing trees. For trees that are located on a proposed development site, the appropriate arboricultural information should be provided to demonstrate that layouts have been informed by the use of such survey and tree constraints mapping information. If a tree is proposed to be removed, applicants will be expected to show that they have considered alternative design layouts and provide reasons why these layouts were not brought forward.
- 1.1.57.** Tree planting should be considered from the design stage of a proposal. The location of new trees should be planned to complement proposed features, have an appropriately sized tree pit, be bio-secure and be appropriate for the intended use, of the development. We may request details relating to the planned maintenance for new trees and landscaping on development sites, to ensure planting becomes established, particularly within the first five years. Planning conditions will also be used, as appropriate.
- 1.1.58.** All developments are required to minimise impacts on existing trees, hedges, shrubs and other significant vegetation, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development.
- 1.1.59.** In those exceptional circumstances where the loss of or damage to trees of value is unavoidable, mitigation through adequate planting will be secured. As set out in London Plan G7C, recognised valuation systems should be used to inform suitable replacement planting based on the existing value of the benefits of the trees removed. Examples of such valuation systems include i-tree and CAVAT. We will require applicants to provide this information as part of the arboricultural report submitted with the planning application.
- 1.1.60.** Planning conditions will be used for any development proposals where a replacement tree is required. Section 106 planning agreements may also be used, in circumstances where a payment in lieu is required.
- 1.1.61.** Where there are constraints to planting and re-planting cannot occur on-site, or only partial canopy cover can be re-provided, the development will be required to provide

evidence to justify why it is not feasible. Once this is established to our satisfaction, it may then be accepted that off-site compensation is appropriate, or that a financial contribution of the full cost of appropriate re-provision is required. The preference will be to prioritise planting over a financial contribution, unless there are exceptional circumstances in relation to compliance with other policy requirements.

- 1.1.62.** Underground servicing often affects existing trees and/or can limit where new trees are located. Proposals involving existing and/or proposed underground servicing must ensure that the requirements for protecting existing trees and proposing new trees are fully considered.
- 1.1.63.** Although exotic species can have interesting aesthetic qualities, they can also have a damaging impact on biodiversity and the local ecology. We have a strong preference for native species to be planted but, where appropriate, will consider suitable exotic species. Species selection should also be appropriate for the site location and local conditions, taking into account a changing climate. Fruit trees will be supported, as these can provide a variety of benefits.
- 1.1.64.** We will take appropriate measures to prevent or reduce the risk of transmission of emerging pests, diseases and invasive species that are detrimental to the health of trees. With the advent of introduced pests, such as the Oak Processionary Moth (*Thaumetopoea processionea*) and diseases such as Ash Dieback (*Chalara fraxinea*), trees, shrubs and herbaceous plants should follow BS8545: Trees: From Nursery to independence in the Landscape. This includes that trees should not be imported directly from European suppliers and planted straight into the landscape setting but spend a full growing season in a British nursery to ensure plant health and non-infection by foreign pests and diseases before being introduced into a development. Landscape conditions will be used to ensure that good practice is exercised as detailed by LTOA and the Forestry Commission.

Policy O8.5

Urban Greening

We are committed to ensuring that new development incorporates green infrastructure, to help create healthier places, enhance biodiversity and address the urban heat island effect. We will:

- a. Require major developments to incorporate urban greening through site and building design, by:
 - i. Conducting an Urban Greening Factor (UGF) assessment in accordance with the methodology set out in the London Plan;
 - ii. Achieving an UGF of 0.4 for developments that are predominantly residential;
 - iii. Achieving an UGF of 0.3 for developments that are predominantly commercial.
- b. Require all developments to consider green infrastructure at an early stage of the design process and incorporate this as part of an integrated design approach.
- c. Strongly encourage the inclusion of urban greening for all other development in Merton.

Justification

- 1.1.65.** Urban greening describes the incorporation of green infrastructure elements into a development, such as vegetation, trees, green roofs, green walls, hedgerows and water features. There can be multiple benefits to including these features in new development including improved physical and mental wellbeing, biodiversity and habitat enhancements, improved air quality, water attenuation, carbon storage, improved visual amenity and helping to address the urban heat island effect.
- 1.1.66.** London Plan Policy G5 includes a London wide UGF model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. We will use the London wide model in the determination of planning applications but may in time develop a local model through further GLA and local supplementary guidance.
- 1.1.67.** The Merton Green Infrastructure Study 2020 includes a technical report which assesses the quantity and quality of green and blue infrastructure throughout Merton. The report identifies that there are only a small number of green roofs in Merton representing less than 0.1% of all green and blue infrastructure. This policy will help to ensure that higher levels of green infrastructure are provided on development sites through the use of urban greening features such as green roofs and walls, helping to enhance biodiversity and create healthier places.
- 1.1.68.** Merton Council declared a Climate Emergency in July 2019 and is working towards the implementation of a Climate Action Plan that will set out the strategic approach to reducing carbon emissions in the borough. One of the key action areas identified to help the borough become carbon neutral is enabling green space across Merton to capture carbon from the atmosphere. By ensuring that new developments incorporate urban greening, green infrastructure will improve across the borough and help to mitigate the impacts of climate change such as overheating, flooding and loss of biodiversity.
- 1.1.69.** As set out in the Climate Change policies, development proposals will be required to demonstrate they are well designed, fully adaptable and resilient to the impacts of a changing climate. Urban greening should be incorporated into the design of new development to assist in mitigating the risk of overheating and adverse impacts on the urban heat island effect.
- 1.1.70.** All applicants will be expected to consider green infrastructure at the earliest possible stage of the design process and take every opportunity to incorporate urban greening elements into their development. This should be clearly shown through the Pre-Application process.

1.1.71. Applicants will be required to provide the following information:

- Appropriate information which provides sufficient detail on the type(s) of green infrastructure proposed;
- Justification indicating why the type(s) of green infrastructure have been proposed for the development;
- The UGF calculation and score; and
- Appropriate information on how the urban greening elements will be maintained and managed over the lifetime of the development.

1.1.72. Urban greening is not only relevant for major development sites. Given that a large proportion of development that will come forward over the Local Plan period will be on small sites, it will be important that these sites also contribute to the provision of additional green infrastructure in the borough. Planning applications submitted for small sites will be strongly encouraged to incorporate urban greening on site as part of a development. While there are many ways this can be done, three examples include creating greener front gardens, using capillary matting instead of hard standing for car parking areas and increasing the overall amount of vegetation on site. Further information is provided in Merton Council's Small Sites Toolkit

Policy O8.6

Wandle Valley Regional Park

We are committed to protecting the Wandle Valley Regional Park and maintaining it as a strategic, biodiverse and accessible corridor through the borough. We will:

- a. Support the Wandle Valley Regional Park as one of London's major green networks, protecting biodiversity and supporting opportunities for formal and informal recreation through enhanced accessibility.
- b. Protect and enhance the River Wandle, including its green and blue infrastructure, biodiversity and wildlife corridors.
- c. Support opportunities for green infrastructure improvements to the Wandle Valley Regional Park and along the River Wandle.
- d. Support the completion of the Wandle Trail.
- e. Require development within 400m of the Wandle Valley Regional Park boundary to consider its relationship to the park in terms of visual, physical and landscape links, and ensure that new development positively enhances accessibility to the park through improvements to walking and cycling.
- f. Expect all new development within 400m of the Wandle Valley Regional Park to provide green infrastructure elements on site through urban greening.
- g. Work with the Environment Agency, Thames Water, the Greater London Authority, landowners and developers to implement flood risk reduction measures which include green infrastructure, that manage river and surface water flooding while delivering wider benefits for water and air quality, people and wildlife.
- h. Encourage the celebration of the Wandle Valley Regional Park through community celebrations, arts, cultural events and sporting activities that will support and promote tourism and recreation in Merton.
- i. Work with neighbouring boroughs and relevant bodies to support and encourage increased accessibility through the Wandle Valley Regional Park.

Justification

- 1.1.73.** The Wandle Valley Regional Park is made up of a number of sites that run along or nearby to the River Wandle. These spaces, particularly the Wandle Trail, are especially important for the quality of life of residents in Merton, positively contributing to their health and wellbeing.
- 1.1.74.** For the purposes of this document, the Wandle Valley Regional Park is taken to mean the areas of land in the borough which correspond to the area defined in the All London Green Grid Wandle Area Framework, as shown on the Policies Map.
- 1.1.75.** The Wandle Valley Regional Park Trust was established in 2012 to provide leadership and coordination of a sub-regional partnership to improve the effectiveness, coherence, resilience and quality of the Wandle Valley Regional Park. The 2016-2021 Strategy identifies the Wandle Valley Regional Park as a strategically important asset for London. The Trust supports the promotion of the park not just as a collection of green spaces, but as an interconnected system that can benefit communities living and working in the wider Wandle Valley area.

Green infrastructure and biodiversity functions

- 1.1.76.** The Wandle Valley Regional Park is one of the largest strategic green links in south west London. Rather than a single area of open land, the park is made up of a green grid of connected spaces with visual or physical links to the current or historic route of the River Wandle.
- 1.1.77.** The Wandle Valley Regional Park enables improved access to a linked network of open spaces, including parkland, wildlife areas, riverside walks and facilities for children and young people, which increases the quality of the environment and contribute to the identity of the valley as a place to live, work and visit.
- 1.1.78.** The River Wandle forms part of London's network of waterways, also known as the Blue Ribbon Network in the London Plan. It is an important green corridor for species movement throughout south west London with a number of protected species found along its length. Biodiversity and wildlife should be protected and enhanced along the waterways. In line with the other green infrastructure policies, applicants will be expected to demonstrate that proposed development will not have a significant adverse effect on protected or priority species and habitats.
- 1.1.79.** For development within 400m of the Wandle Valley Regional Park, an increase in green cover through the provision of elements such as high-quality landscaping, trees, green

roofs, green walls and nature based sustainable drainage will help to strengthen the Wandle Valley Regional Park as a network of green and open spaces, while also enhancing biodiversity.

Accessibility

- 1.1.80.** The Wandle Valley Regional Park is a place for healthy living, enhancing physical and mental health by improving access to good quality public realm and green spaces.
- 1.1.81.** The [Wandle Trail](#) is an established footpath and cycle way, providing a 12 mile (20 km) strategic green route that offers the enjoyment of a variety of chalk stream heritage, flora and fauna. Predominantly following the River Wandle, the trail runs between East Croydon station to the Thames Path in Wandsworth, crossing through Merton with a section of the trail in the north of the borough forming part of the national cycle network route 20. The Wandle Trail links key destinations in the borough and beyond, via convenient shortcuts and quiet routes away from busy roads. It forms a strategically important part of the borough's cycling and walking network that plays a vital role in enabling active travel choices.
- 1.1.82.** While most sections are in a good condition, there are some missing links and areas that will require future investment and improvement to enable a continuous trail that is fully accessible to all users, at all times of the year. We support the completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield. This will complete a missing link, and provide a safer, quieter and more pleasant alternative route for cyclists and pedestrians to the busy Durnsford Road bridge. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access.
- 1.1.83.** The Wandle Trail is an established footpath and cycle way, providing a 12 mile (20 km) strategic green route that offers the enjoyment of a variety of chalk stream heritage, flora and fauna. Predominantly following the River Wandle, the trail runs between East Croydon station to the Thames Path in Wandsworth, crossing through Merton.
- 1.1.84.** While most sections are in a good condition, there are some missing links and areas that will require future investment to enable a continuous trail. We support the completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth. Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access.

- 1.1.85.** Improvements to wayfinding and signage along the Wandle Trail and throughout the Wandle Valley Regional Park are welcomed, as these will help to increase accessibility and encourage more residents and tourists to visit. Access points and trails should be inclusive and provide access for all.
- 1.1.86.** Proposed development along the Wandle Trail and within the Wandle Valley Regional Park should seek to enhance accessibility for pedestrians and cyclists through providing safe, welcoming and inclusive environments that will encourage active transport.
- 1.1.87.** There are also future opportunities for the Wandle Valley Regional Park to incorporate a large area of open space stretching from Mitcham Common and Three Kings Piece to Beddington, in the neighbouring borough of Sutton. We will continue to work with the relevant bodies to support the expansion of this green space and enable access to and from the borough.

Development within 400m of the Wandle Valley Regional Park

- 1.1.88.** The Wandle Valley Regional Park is a significant blue and green corridor that offers a range of visual, physical and health benefits to residents and visitors.
- 1.1.89.** All applications for development within 400m of the Wandle Valley Regional Park, as identified on the Policies Map, will be required to show how the visual, physical and landscape links to the park have been considered for the design of the development. This should include details in the Design and Access Statement showing how the relationship between the proposed development and the Wandle Valley Regional Park has been considered in the design of the built form and access to the site. This is to ensure access to the Wandle Valley Regional Park is protected and enhanced, promoting sustainable travel options and healthier lifestyles.
- 1.1.90.** Our aspiration is for new development to complement the existing green corridors. As outlined in our transport policies, development proposals should enhance or enable new walking and cycling connections and networks to the Wandle Valley Regional Park, including the Wandle Trail. Physical barriers such as railings and built form that disrupts continuity and access into and around the park should be removed through the design of new development.
- 1.1.91.** Proposals that restrict or block off existing access to the Wandle Valley Regional Park will not be supported unless it can be demonstrated that alternative and better quality access will be provided.

Recreation and cultural functions

- 1.1.92.** The areas that make up the Wandle Valley Regional Park are key cultural and recreational attractions for the borough, as well as being vital green and blue assets delivering a wide range of benefits. The vibrant mix of leisure and recreation opportunities, such as Morden Hall Park, Deen City Farm and Watermeads Nature Reserve attracts both local residents and visitors. These attractions are significant for the borough as they help to promote tourism and celebrate the cultural features of the area.
- 1.1.93.** Tourism and recreation activities throughout the Wandle Valley Regional Park are encouraged, particularly where activities can promote active and healthy lifestyles.
- 1.1.94.** Proposals should make use of, and improve access to, existing cycling and pedestrian routes in the Wandle Valley Regional Park and encourage sustainable commuting patterns for tourism and recreation activities.

Other

- 1.1.95.** There are a number of overhead network power cables within the area surrounding the Wandle Valley Regional Park which include 20 pylons on the Beddington to Wimbledon overhead. We will support the relocation of existing power lines, pylons and other visually intrusive servicing as part of planning agreements in relation to new developments where it is technically, practically, environmentally and economically viable. This will be dependent on agreements being made between landowners and the relevant infrastructure providers.

Strategic Policy F13.8

Flood Risk Management and Sustainable Drainage

As a Lead Local Flood Authority, we will work in partnership with the Environment Agency, water companies, developers, neighbouring boroughs and local communities to manage and reduce flood risk from all sources. We will:

- a. Steer development towards areas at lowest risk of flooding from all sources through the application of sequential test, as set out in the National Planning Policy Framework (NPPF) and supporting national Planning Practice Guidance; assess the cumulative impact of development and land use change; and make strategic planning decisions using the most up-to-date flood risk data and information from Merton Council, the Environment Agency, other Risk Management Authorities (RMAs) and the National Flood and Coastal Erosion Risk Management Strategy for England (2020).
- b. Implement the recommendations and objectives of Merton's flood risk management plans, such as the [Strategic Flood Risk Assessment \(SFRA\)](#), Local Flood Risk Management Strategy and other RMAs' flood risk management plans.
- c. Require all developments to incorporate flood resilience measures and be adaptable to the future impacts of climate change.
- d. Ensure all major development includes water efficiency measures such as rainwater harvesting or grey water recycling to minimise water consumption, and SUDS (Sustainable Drainage Systems) to deliver multi-functional benefits such as managing surface water runoff, improving biodiversity, and providing amenity and water quality benefits.
- e. Deliver wastewater infrastructure improvements across the borough in partnership with water companies to help develop and implement their Drainage and Wastewater Management Plans (DWMPs).
- f. Reduce the risk of flooding (from all sources) in an integrated way through coordination with the following local plan policies; –O13.2 Open Space and Green Infrastructure, O13.6 Urban Greening, O8.7 Wandle Valley, F13.9 Managing Local Flooding, F13.10 Sustainable Drainage Systems, D5.1 Placemaking and Design.

Justification

- 1.1.96.** Management of flood risk within Merton will be undertaken in line with the National Planning Policy Framework (NPPF), Flood and Water Management Act 2010, Flood Risk Regulations 2009 and the European Water Framework Directive 2000 transposed into law through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.
- 1.1.97.** Merton Council has statutory duties and responsibilities, set out under the Flood and Water Management Act 2010. As Lead Local Flood Authority, Merton Council is responsible for managing local flood risk, including flooding from surface run-off, ordinary watercourses and groundwater. The Environment Agency is responsible for main rivers (including the River Wandle, The River Graveney and the Beverley and Pyl Brooks in Merton). Thames Water are responsible for wastewater sewerage, including flooding arising from public sewers. Sutton and East Surrey Water and Thames Water are responsible for clean water supply in the borough. The sources and mechanisms of flooding are often interlinked, and Merton Council will continue to work in partnership with all RMAs and local interested groups, such as the South East Rivers Trust and neighbourhood groups to manage the risk of flooding.
- 1.1.98.** Merton Council has updated the Strategic Flood Risk Assessment (SFRA) in partnership with LB Wandsworth and the Environment Agency. The SFRA takes consideration of the updated national climate change allowances. The Level 1 SFRA provides an overview of flood risk issues in Merton from all sources. The Level 2 SFRA assesses the risk to specific site allocations where development is proposed in areas at risk from flooding. The Level 2 SFRA provides sufficient information to allow the application of part b) of the NPPF Exception Test.
- 1.1.99.** Information and guidance on how to carry out a Sequential Test and Exception Test and what must be addressed within a development's Flood Risk Assessment can be found in [Merton's online SFRA GIS map](#). Further guidance can also be found in the Environment Agency's current advice on Flood Risk Assessment, NPPF and the National Planning Practice Guidance, all of which are available online. Pre-application discussions with the Environment Agency and/or Merton Council are strongly recommended to confirm both the requirements for flood risk management, any mitigation which may be required and to ensure sustainable drainage is incorporated appropriately and accordance with Policy F13.10 Sustainable Drainage Systems.
- 1.1.100.** Merton's Local Flood Risk Management Strategy identifies Merton's objectives and measures for how we will manage local flood risk, (defined as flooding from surface water, groundwater and ordinary watercourses) and it includes specific requirements with regards to management of flood risk to and from development. Developers should ensure

that development proposals meet the objectives and requirements identified in the Local Flood Risk Management Strategy.

- 1.1.101.** Flood events are expected to become more frequent and more significant in the future as the U.K.'s climate changes and this requirement will go some way to adapting to this change. The installation of sustainable drainage measures, such as green roofs, raingardens and swales can deliver multi-functional benefits: increasing biodiversity and urban cooling, enhance open space in built-up areas and improvements to water quality. Merton's SUDS SPD provides further guidance on designing and implementing SUDS in development and addresses how Merton, as the LLFA, will review and evaluate third party drainage proposals on developments.
- 1.1.102.** SUDs will be implemented in all developments. The requirement to utilise SUDS including those in low-risk areas, is because surface water from one area of a catchment may contribute towards enhanced flood risk in another area of that catchment.

Policy F13.9

Managing Local Flooding

- a. Developments must incorporate the latest climate change allowances as part of the Flood Risk Assessment (FRA) and/or Surface Water Drainage Strategy.
- b. Where development is proposed in the Environment Agency’s Groundwater Source Protection Zones 1 or 2, measures must be taken to ensure the protection of groundwater supplies.
- c. Developments must demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development. Where there is limited or no capacity identified through known flood incidents or predicted flood risk, on-site improvements must be programmed/planned.
- d. We will expect to see a sequential approach applied to the site layout, locating the most vulnerable elements of a proposed development within areas at lowest risk of flooding. All buildings should be set back at least 8m from the banks of main rivers and 5m from the banks of ordinary watercourses to allow improvements and maintenance of land drainage and flood defences, improve the ecological functioning of river corridors and enhance local amenity.
- e. In Flood Zones 2 and 3 or on sites shown to be at high risk of surface water flooding and for all proposals for sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved in accordance with the SFRA, a Flood Emergency Plan must be submitted.
- f. Permit appropriate development in Flood Zones 1, 2, 3a and 3b subject to meeting the criteria in the following table:

Flood zones: Land uses and developments restrictions	Sequential Test	Exception Test	FRA and Drainage Strategy
<p>Flood Zone 3b: Functional floodplain</p> <p>The functional floodplain will be protected by not permitting any form of development on undeveloped sites unless it is:</p> <ul style="list-style-type: none"> • Water Compatible development. • Essential utility infrastructure <p>In these cases, essential infrastructure that has passed the Exception Test, and water compatible uses should be designed and constructed to remain operational and safe for users in times of flood; result in no net loss of</p>	<p>Required for essential infrastructure.</p>	<p>Required for essential infrastructure.</p>	<p>An FRA is needed for all developments.</p> <p>A Drainage Strategy is needed for all new dwellings and major developments.</p>

Flood zones: Land uses and developments restrictions	Sequential Test	Exception Test	FRA and Drainage Strategy
<p>floodplain storage; not impede water flows and not increase flood risk elsewhere.</p> <p>Redevelopment of existing developed sites will only be supported if there is no intensification of the land use, no increase in building footprint, number of units or bedrooms and a net flood risk reduction is proposed.</p> <p>Restoration of the functional floodplain will be supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability classification will not be allowed.</p>			
<p>Flood Zone 3a: High Risk</p> <p>Essential Infrastructure and More Vulnerable development may be permitted where the Exception Test is satisfied.</p> <p>Water Compatible and Less Vulnerable land uses are permitted.</p> <p>Highly Vulnerable developments will not be allowed.</p> <p>Self-contained residential basements and bedrooms at basement level will not be allowed.</p>	<p>Required for all developments unless exceptions outlined in the justification applies.</p>	<p>Required for Essential Infrastructure and More Vulnerable development.</p>	<p>A Drainage Strategy is needed for all new dwellings and major developments.</p> <p>An FRA is required for all development proposals.</p>
<p>Flood Zone 2: No land use restrictions</p> <p>Self-contained residential units at basement level and bedrooms at basement level will not be allowed by the Council without right mitigation measures in line with Environment Agency Guidance and Merton Local Plan policy.</p>	<p>Required for all developments unless exceptions outlined in the justification applies.</p>	<p>Required for Highly Vulnerable development.</p>	<p>A Drainage Strategy is needed for all new dwellings and major developments.</p> <p>An FRA is needed for all development proposals.</p>
<p>Flood Zone 1 No land use restrictions.</p>	<p>N/A</p>	<p>N/A</p>	<p>A Drainage Strategy is needed for all new dwellings and major developments.</p>

Flood zones: Land uses and developments restrictions	Sequential Test	Exception Test	FRA and Drainage Strategy
			<p>In line with Merton’s Strategic Flood Risk Assessment (SFRA) and the Planning Practice Guidance, an FRA is needed for development sites which are:</p> <ul style="list-style-type: none"> • more than 1 hectare (ha) • less than 1 ha, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where it could be affected by sources of flooding other than rivers (for example surface water, groundwater and sewer flooding) as identified in the Merton Council SFRA • in an area which has critical drainage problems

Where a Flood Risk Assessment (FRA) is required, it must:

- i. Conform with national policy and guidance, as well as the BSI (British Standards Institution) Code of Practice on Assessing and managing flood risk in development (BS 8533:2017). Merton Council and/or Environment Agency may need addition research or information depending on the type of development and location to be included in the FRA.
- ii. Be submitted with the planning application.
- iii. Provide evidence of the application of the Sequential Test and where required, the Exception Test.
- iv. Take account of the advice and recommendations within the Merton’s Strategic Flood Risk Assessment, Local Flood Risk Management Strategy and Surface Water Management Plan.

Planning conditions or planning obligations may be used where appropriate to secure flood risk mitigation and sustainable drainage measure to mitigate flooding from different flood sources within development proposals.

Basements and subterranean developments

Basements within flood affected areas of the borough represent a particularly high risk to life, as they may be subject to very rapid inundation. Applicants will have to demonstrate that their proposal meets the following requirements:

Flood Zone	Details
Flood Zone 3b Functional Floodplain	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will not be allowed.
Flood Zone 3	<p>New basements:</p> <ul style="list-style-type: none"> • Less Vulnerable / Water Compatible uses are permitted. • More Vulnerable uses will only be considered if an FRA shows that the risk to life can be managed. Bedrooms at basement levels will not be allowed. • Highly Vulnerable uses, such as self-contained basements/bedrooms use will not be allowed. <p>Existing basements:</p> <ul style="list-style-type: none"> • No basement extensions, conversions, or additions for Highly Vulnerable uses. • More Vulnerable uses will only be considered if an FRA demonstrates that the risk to life can be managed.
Flood Zone 2	<p>New Basements: if the Exception Test (where applicable) is passed, basements may be allowed for residential use where they are not self-contained or used for bedrooms.</p> <p>Existing Basements: basement extensions, conversions or additions may be allowed for existing developments where they are not self-contained or used for bedrooms.</p> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
Flood Zone 1	No restrictions on new basements or extensions to existing basements, providing they are accompanied with the necessary assessments.
Flood Zone	Details
Flood Zone 3b (Functional Floodplain)	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will not be allowed.

Flood Zone	Details
Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will not be allowed.	
Flood Zone 3 Zone	<p>New basements:</p> <ul style="list-style-type: none"> • Restricted to Less Vulnerable / Water Compatible use only. 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment shows that the risk to life can be managed. Bedrooms at basement levels will not be allowed. • 'Highly Vulnerable' such as self-contained basements/bedrooms use will not be allowed. <p>Existing basements: No basement extensions, conversions, or additions for 'Highly Vulnerable' uses. More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed.</p>
Flood 2	<p>New Basements: if the Exception Test (where applicable) is passed, basements may be allowed for residential use where they are not self-contained or used for bedrooms.</p> <p>Existing Basements: basement extensions, conversions or additions may be allowed for existing developments where they are not self-contained or used for bedrooms.</p> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
Zone 1	No restrictions on new or extensions to existing basements providing they are accompanied with the necessary assessments.

Justification

- 1.1.103.** The protection of people, properties, and infrastructure from the risk of flooding from all sources is of immense importance. The flood risk and sustainable drainage systems policies are supported by Merton's Strategic Flood Risk Assessment (SFRA), Local Flood Risk Management Strategy (LFRMS) and Surface Water Management Plan (SWMP).
- 1.1.104.** Merton is affected by several sources of flood risk, primarily surface water flooding which has been the cause of recent flood events in the borough in the summer storms of 2017, 2016 and most significantly in 2007. The borough is also affected by flooding from rivers, ordinary watercourses, sewers, reservoirs and groundwater flooding. The Level 1 SFRA gives an overview of flooding from all sources across the borough.
- 1.1.105.** The Environment Agency's Risk of Flooding from Surface Water mapping, alongside Merton's SFRA, LFRMS and SWMP and historical flooding records of the borough, show that several areas including Colliers Wood, West Barnes and Raynes Park and Summerstown are affected by multiple flood risk sources.
- 1.1.106.** We hold practical information on our website where users can: find out if they are at risk of flooding, get help during a flood, report flooding, and find out more about how we are managing local flood risk.
- 1.1.107.** To create job opportunities, deliver homes and essential infrastructure, meet the demands of predicted population growth, enable future economic growth and secure improvements in areas such as Colliers Wood and other sites within the Wandle Valley, it will be necessary to develop on sites within areas at medium to high risk of flooding, subject to meeting the requirements of the Sequential and Exception Tests as set out in the NPPF.

Flood Risk Assessments (FRAs)

- 1.1.108.** Flood Risk Assessments (FRAs) will be needed in line with national policy and guidance, as well as the BSI (British Standards Institution) Code of Practice on Assessing and managing flood risk in development (BS 8533:2017). This code provides detailed information on the requirements for assessing and managing flood risk in development and how to produce site-specific FRAs.
- 1.1.109.** Developers should agree the scope of the FRA in consultation with the council in their role and the LPA and LLFA from the earliest stages of project planning and design to ensure that appropriate flood risk management measures are included as part of the design and layout. Developers should refer to the EA's guidelines on 'Flood Risk Assessment for Planning Applications' or the EA's 'Standing Advice on Flood Risk Assessment' in cases where an FRA is not needed, including for householder applications and minor non-residential extensions. We will consult the EA on all proposals

accompanied by an FRA or for any proposal within 20m of a main river or culverting operation.

- 1.1.110.** FRAs should assess the risk of flooding in the future as a result of the impact of climate change on river flows and rainfall patterns, taking account of the latest climate change allowances. This will help minimise vulnerability and provide resilience to flooding in the future. FRAs should set out the proposed measures to manage flood risk over the lifetime of the development, including measures to steer development away from areas considered to be at high risk of flooding from all sources, applying appropriate site and building design (Policy 5.1), incorporating Sustainable Drainage Systems (Policy F13.10), maintaining and enhancing the borough's green and blue infrastructure (Policy O13.2) and contributing to urban greening (Policy O13.6).
- 1.1.111.** FRAs must address the management of surface run-off, the extent of impermeable surfaces resulting from the development, and the potential for increased flood risk both on-site and elsewhere within the catchment.
- 1.1.112.** In addition to fluvial flooding, properties and infrastructure within the Merton are also at high risk of flooding from other, more localised sources, such as surface / groundwater / sewer flooding due to surcharging of sewers and drains or due to the failure of infrastructure. Flooding can also occur away from the fluvial floodplain because of development where on-site/off-site infrastructure is not in place ahead of development. Therefore, an FRA is also needed for smaller development proposals in Flood Zone 1, where there is evidence of a risk from other sources of flooding identified in the SFRA.

Sequential Test and Exception Test

- 1.1.113.** Future development in Flood Zones 3a and 2 will only be considered if the 'Sequential Test' has been applied following national policy and guidance. However, there will be some exceptions to this. The Sequential Test will not be needed if, it is not a major development and at least one of the following applies:
- It is a Local Plan proposal site that has already been sequentially tested, unless the use of the site being proposed is not per the allocations in the Local Plan.
 - It is within a main centre boundary as identified within this Local Plan (Wimbledon and Morden town centres).
 - Redevelopment of an existing single residential property.
 - Conversions and change of use.

- 1.1.114.** The Sequential Test will be needed in all other cases.
- 1.1.115.** If, following the application of the sequential test, it is not possible, consistent with wider sustainability objectives (environmental, social and economic) for development to be in a flood zone with a lower probability of flooding, the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

Water infrastructure

- 1.1.116.** We will look to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will need to show that there is adequate capacity both on and off-site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out studies to learn the effect proposed development will have on the existing infrastructure. Overloading of the system will not be allowed.
- 1.1.117.** Where there is a capacity problem the developer will need to fund improvements to be completed prior to completion of the development. An exception to this is where the water company has improvement works programmed in that fits with the completion time of the development.

Basement and subterranean Supplementary Planning Document (SPD)

- 1.1.118.** Basement and subterranean applications must ensure they are safe from flooding and do not increase risk to and from the site. We will only allow basements and other underground/subterranean development where:
- it can be proven it will not cause harm to the built and natural environment and local amenity including the local water environment, ground conditions and biodiversity.
 - the basement itself will be protected from flooding.
 - positively pumped devices are installed to protect basements from the risk of sewer flooding.
- 1.1.119.** Basement developments require the submission of more information in the form of a Basement Impact Assessment (BIA), Construction Method Statement (CMS) and Site-Specific Ground Investigation to provide us with a basis for deciding planning applications. Merton's Basement and Subterranean Development SPD provides guidance and sets out what needs to be demonstrated as part of an assessment. All other information must be submitted with the planning application. The SPD is a material consideration as part of the planning decisions.

Policy F13.10**Sustainable Drainage Systems (SUDS)**

All major development must include water efficiency measures, to minimise water consumption such as rainwater harvesting or grey water recycling, as well as Sustainable Drainage Systems (SUDS) to reduce surface water runoff to greenfield rates, and provide biodiversity, urban greening, amenity and water quality benefits.

Details should be supplied which address the maintenance requirements of the drainage systems for the lifetime of the development which they serve.

We will require all developments to reduce the risk of flooding by:

- a. Seeking mitigating measures against the impact of flooding from all sources and ensure all new development including all basement and subterranean development implement appropriate SUDS and show sustainable approaches to the management of surface water in line with the Non-Statutory Technical Standards for SUDS.
- b. Ensuring developers prove the maintenance and long-term management of SUDS through a SUDS Management Plan submitted as part of the planning process.
- c. Requiring developers to incorporate soft landscaping, appropriate planting (including trees) and permeable surfaces into all new developments including non-residential developments, in line with Policy O8.7 Urban Greening.
- d. Requiring the retention of soft landscaping and permeable surfaces in existing gardens. For example, all new driveways or parking areas associated with development should be made of permeable materials in line with permitted development rights.
- e. Ensuring any development or re-development that effects a heritage asset or its setting (including conservation areas) must consider Sustainable Drainage Systems (SUDS) and demonstrate within a Heritage Statement the approach taken to ensure that there is no adverse impact on the character and appearance of the asset and that there is no long-term deterioration to the building's fabric.
- f. Reducing surface water discharge to greenfield runoff rates.
- g. Using conditions or planning obligations to secure flood risk mitigation and sustainable drainage measures.

Justification

Surface water and sewer flooding

- 1.1.120.** The borough is very susceptible to surface water flooding. Surface water flooding happens when the ground and rivers cannot absorb heavy rainfall and when manufactured drainage systems have insufficient capacity to deal with the volume of rainfall. Typically, this type of flooding is localised and happens very quickly, making it exceedingly difficult to predict and give warnings. With climate change predicting more frequent short-duration, high intensity rainfall and more frequent periods of long-duration rainfall, coupled with an ageing Victorian sewer system and increasing pressure from growing populations, surface water flooding is likely to be an increasing problem.
- 1.1.121.** Thames Water has modelled the impact of London's projected population growth and climate change on its drains and sewers to understand their ability to cope with these future challenges. The modelling shows that for a relatively common rainfall event in 2050 (one that would be expected on average once every other year), some areas of London, would not have sufficient drainage or sewerage capacity to manage the expected flows, leading to an increasing risk of surface water and sewer flooding.
- 1.1.122.** We will seek to direct development away from areas at the highest risk of flooding, or, where development is required in areas at risk of flooding, we will ensure it is safe for the lifetime of development, without increasing flood risk elsewhere. Development proposals should ensure that they have taken full account of flood risk and sought to utilise sustainable drainage measures.
- 1.1.123.** To reduce the risk of surface water and sewer flooding, all development proposals in the borough that could lead to changes to, and have impacts on, surface water run-off must follow the London Plan drainage hierarchy:
- store rainwater for later use
 - use infiltration techniques, such as porous surfaces in non-clay areas.
 - attenuate rainwater in ponds or open water features for gradual release to a watercourse
 - attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse discharge rainwater direct to a watercourse.
 - discharge rainwater to a surface water drain
 - discharge rainwater to a combined sewer

- 1.1.124.** As well as managing flood risk, consideration should be made for how rainwater harvesting systems can be used to minimise the use of mains water, as promoted by Policy CC8.15 Sustainable Design Standards.

Sustainable Drainage System (SUDS)

- 1.1.125.** SUDS is a drainage and landscaping scheme which utilises a 'management train' of various drainage techniques used in series to mimic as closely as possible the natural site's processes, thereby mitigating and managing the impact of a development on flood risk, water quality and biodiversity and amenity value.
- 1.1.126.** It is important to ensure that new development sites found within the Strategic Flood Risk Assessment identified area of 'increased risk of surface water ponding' implement surface water attenuation. It is imperative that this policy is read in conjunction with other Local Plan flood management policies and Merton's Sustainable Drainage and Design and Evaluation Supplementary Planning Document (SPD) (known as the SUDS SPD).
- 1.1.127.** Merton's SUDS SPD supplies further guidance and support to the Local Plan policies relating to flood risk (from all sources) and SUDS. The SPD sets out our expectations on designing, maintaining and managing SUDS and is a material consideration as part of planning decisions.

Green roofs and walls

- 1.1.128.** The design and operational needs of a green roof or wall should not place undue stress on water supply and other natural resources. Extensive green roofs, which are suitable for flat and pitched roofs and for retrofitting, with minimal maintenance and no requirement for irrigation once established, are particularly encouraged. All green and brown roof systems should use a high percentage of recycled products.
- 1.1.129.** The provision of green roofs does not negate the need to make adequate open space provision on the ground. Any proposals for accessible green roofs need to be designed for security and safety and not adversely affect neighbouring properties.
- 1.1.130.** The use of green roofs and green walls in smaller developments, renovations, conversions, extensions and retrofitting is encouraged and supported, where opportunities arise. Conditions will be used where proper to secure the proper installation, maintenance and responsibility for green roofs and walls.

Policy P13.11

Improving Air Quality and Minimising Pollution

- 1.1.131.** Merton Council will ensure that local environmental impacts of all 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. These potential impacts can include, but are not limited to, air pollution, water pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.
- 1.1.132.** Several policies in the local plan contribute to reducing and/or mitigating the impacts of air pollution such as transport, green infrastructure, design and climate change policies. Developers must follow any guidance provided by Merton Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts.

Air Quality

- a. Major developments in Merton, development briefs for large-scale development subject to an Environmental Impact Assessment (EIA) should achieve Air Quality Positive Approach status.
- b. All developments must be at least Air Quality Neutral and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Merton's Local Air Quality Management Plan.
- c. Development proposals in Air Quality Focus Areas (AQFAs) or development proposal that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure following London Plan policy SI 1: *Improving air quality*.
- d. Residential development proposals and change of use to residential at street level will need to submit an Air Quality Impact Assessment in areas of poor air quality.
- e. Development proposals must consider the impact of introducing new developments in areas already subject to poor air quality, the following will be needed:
 - i. An Air Quality Impact Assessment, including where necessary, modelled data.

- ii. Mitigation measures to reduce the development's impact upon air quality including the type of equipment installed, thermal insulation and ducting abatement technology.
 - iii. Measures installed in the new development to protect the occupiers of new developments from existing sources of pollution.
 - iv. Strict mitigation for developments to be used by sensitive receptors such as schools, hospitals, care homes, areas of deprivation and in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.
 - v. The use of green infrastructure, including trees and hedgerows to reduce the exposure to air pollution to absorb dust and other pollutants.
- f. Development proposals will be expected to demonstrate how they will minimise air pollution associated with the transport requirements including delivery, servicing and construction vehicles.
- g. All decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies.
- h. We will seek financial contributions using Planning Obligations towards air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality.

Noise and vibration

- a. Development proposals will be expected to:
- i. Provide a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels.
 - ii. Provide mitigation measures where noise needs to be controlled and managed.
 - iii. Agree to time limits and restrictions for activities where noise cannot be sufficiently mitigated.
 - iv. Use good acoustic design within their development.
 - v. That where applicable suitable mitigation measures will be sought by planning obligation or condition.
 - vi. Minimise noise from servicing and deliveries.
 - vii. Protect the relative tranquillity in and around open spaces.
- b. New noise generating developments should be appropriately located to minimise their impacts on noise sensitive land uses and noise-sensitive developments should be located away from noise priority locations and noise generating land uses.
- c. New development which would have a significant effect on existing or future occupiers or the local amenity due to noise or vibration will not be allowed unless the potential noise problems can be overcome by suitable mitigation measures.

- d. Where a noise-sensitive development is seeking planning permission to locate in an already noisy area (e.g. a town centre or near a busy road), the new noise-sensitive development will be responsible for mitigating impacts from existing noise-generating activities in line with the Agent of Change principle set in the National Planning Policy Framework and the London Plan.
- e. We will support good acoustic design and use of innovative technologies to minimise noise levels.
- f. Where necessary, applicants will be expected to carry out noise assessments and provide details of the noise levels on the site. Where noise mitigation measures will be required to enable development to take place, an outline application will not normally be acceptable.

Light pollution

- g. The potential adverse impacts from lighting arrangements will be controlled by requiring all developments that include proposals for external lighting including illuminated signs and advertisements, security and flood lights and other illuminations to submit details in line with the recommendation of the Institute of Lighting Professionals. Lighting details must show that it:
 - i. is appropriate for the intended use,
 - ii. provides the minimum amount of light necessary to achieve its purpose and designed to minimise the detrimental impact of glare and light spill on the local amenity, nature, biodiversity and highways,
 - iii. is energy efficient and
 - iv. provides adequate protection from glare and light spill, particularly to nearby sensitive receptors such as residential properties and Nature Conservation Areas, including the River Wandle.
- h. Development proposals for leisure, sport and/or play facilities must follow Sport England's Artificial Lighting Guidance and London Plan policy S5 Sports and recreation facilities.

Odours and fume control

- i. Merton Council will ensure that any potential impacts relating to odour and fumes from commercial activities are mitigated by requiring the following:
 - i. An impact assessment where necessary.
 - ii. The type and nature of filtration to be used.
 - iii. The height and position of any chimney or outlet.
 - iv. Promotion and use of new abatement technologies.

Land contamination

When development is proposed on or near a site that is known to be, or there is good reason to believe may be, contaminated, or where a sensitive use is proposed. The applicant must carry out a site assessment and submit a report of the findings to establish the nature and extent of the contamination. Development will not be permitted unless practicable and effective measures are to be taken to treat, contain or control any contamination.

- j. Incorporate proper remediation measures for development on or near a site which is potentially contaminated.
- k. Development will not be allowed unless practical and effective measures are taken to treat, contain or control any contamination so as not to:
 - i. Expose the occupiers of the development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to unacceptable risk.
 - ii. Threaten the structural integrity of any building built, or to be built, on or adjoining the site.
 - iii. Lead to the contamination of any watercourse, water body or aquifer.
 - iv. Cause the contamination of adjoining land or allow such contamination to continue.
- l. We will not approve any application that the Health and Safety Executive (HSE) has recommended that permission should not be granted.

Managing pollution from construction and demolition

Merton Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments.

- m. To deliver this we require the submission of Construction Management Statements (CMS) for the following types of developments:
 - i. All major developments.
 - ii. Any basement and subterranean developments.
 - iii. Developments of sites in confined locations or near sensitive receptors; or
 - iv. If substantial demolition/excavation works are proposed.
- n. Where applicable and considered necessary, we may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS.
- o. For major development, applicants should show how they have considered Merton's Air Quality Action Plan, Merton's emerging Air Quality Supplementary Planning Document, Merton's emerging Non-Road Mobile Machinery (NRMM) Practical Guide, Dust Controls

and Logistics Planning from the earliest stage in the design and construction method of their development.

- p. Construction and demolition sites must ensure silt does not enter the local drainage systems or watercourses and is carefully controlled and managed on site to prevent pollution and environmental damage.
- i. It's essential construction and demolition sites follow the [Right Waste Right Place guidance](#) and [Waste Management Duty of care of practice](#) to ensure construction and demolition waste is managed correctly to prevent pollution and miss description of waste.
 - ii. Pollution incidents should be reported to [Environment Agency 24-hour incident hotline](#)
 - iii. Vacant development sites should introduce increased security measures such as high security fencing/ concrete bollards and 24-hour security to prevent trespassing and illegal waste operators moving into vacant development sites to deposit large amount of fly tipping and then abandon sites. Justification
- q. The design and layout of new development must endeavour to minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Any noise and polluting activities or feature such a plant equipment should be located away from sensitive areas, where possible to ensure that there are no detrimental impacts on living conditions, health and wellbeing or local amenity.
- r. Where there are, already significant adverse effects on the environment or amenity due to pollution, sensitive uses should be steered away from such areas. However, given the limited availability of land for development in the borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.
- s. Operations that are likely to give rise to noise, dust, vibration, odour or other pollutants are also controlled by the licensing regulations implemented by Merton's Environmental Health Team, Pollution Teams and the Environment Agency. We advise that applicants to discuss proposals with potential adverse impacts on air, land, light pollution, noise and water at the initial stages of the planning application process with Merton's Environmental Health Team.

Justification

Air quality

- 1.1.133. NPPF Paragraph 181 states that *Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement Air Quality Impact Assessments (AQA)*. All policies in this local plan policies will play a role in reducing and mitigate against the exposure to poor air quality that causes harm to health, including other green infrastructure and health and wellbeing polices. Supported by [Merton's Air Quality Action Plan](#), [Climate Change Strategy and action plan](#), [Merton's Health and wellbeing strategy](#) and [adoption pending Air Quality Supplementary Planning Document \(SPD\)](#) these documents, support the local plan and outline steps we are taking to improve air quality in the borough.
- 1.1.134. Air pollution not only is only detrimental to health and wellbeing but also has impacts on the environment and economy. The World Health Organization (WHO) identifies air pollution as the greatest environmental risk to human health, with 90% of the world's urban population living in cities exceeding its air quality guidelines. In the UK (United Kingdom) each year, it contributes up to 37,000 deaths and costs city-regions over £20bn. In the UK 5.4 million people are living with asthma, around 1 million have 'difficult' asthma which includes an estimated 200,000 adults and children in the UK with 'severe' asthma, a condition that needs specialist assessment and bespoke support and treatments according to the Asthma UK. There is emerging evidence which shows that air pollution increases the number and severity of COVID-19 cases.
- 1.1.135. The local plan can influence air quality in several ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible. The whole borough has been declared an Air Quality Management Area (AQMA) for last two decades.
- 1.1.136. We seek to tackle poor air quality in an integrated way, the Local Plan together with a wider range of measures set out in Merton's Air Quality Action Plan, which supports the Government's Clean Air Strategy (2019), the Mayor of London Environment Strategy (2018) and other legislation.

Air Quality Assessments (AQA)

- 1.1.137. We require that air quality issues to be considered early in the planning process and to be assessed in detail if necessary (i.e. for developments that may increase local emissions significantly) is the best way of establishing a design led approach to mitigating those

emissions and reducing exposure. Further assessments should be carried out as the design evolves to ensure that impacts from emissions are prevented or minimised as far as possible, and to fully quantify the expected effect of any proposed mitigation measures, including the cumulative effect where other nearby developments are also underway or likely to come forward.

- 1.1.138.** Air Quality Assessments should include ‘air quality neutral’ assessments carried out with reference to the GLA’s emission benchmarks for buildings, transport and combustion-based energy plant. Developments that do not exceed these benchmarks will be ‘air quality neutral’.
- 1.1.139.** New developments are expected to contribute towards improving local air quality, particularly where they include potentially major new sources of emissions or could significantly increase traffic-generated emissions. Some developments such as schools, nurseries, hospitals and care homes for the elderly and housing, may be particularly affected by the potential impacts of poor air quality on the occupants of the development. Therefore, development that may result in an adverse impact on air quality including during construction, may require an Air Quality Impact Assessment in order to consider any pollution impact linked to development proposals.
- 1.1.140.** Necessary mitigation measures will be secured through negotiation on a scheme or using planning obligations or conditions where appropriate. Further guidance and more information on our air quality aims and priorities can be found in Merton’s Air Quality Action Plan (AQAP) and Merton’s Air Quality Supplementary Planning Document SPD (adoption pending).

Air Quality Neutral and Positive

- 1.1.141.** We have adopted the London Plan’s approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been exploited, financial contributions to offset the impact of the development on air quality may be considered as a final intervention.
- 1.1.142.** The aim of an AQA is to identify any significant impact on local air quality and/or amenity 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.

- 1.1.143.** Consideration must be given to the impact of improvements on air quality elsewhere. For instance, traffic reductions could improve local air quality but push traffic-related air quality impacts to other areas. Early engagement with us is encouraged to assess how the development could avoid these unintended consequences. The supporting emerging Air Quality Supplementary Planning Document (SPD) provides further details on AQA and what we expect to be proved within an AQA. The assessment should provide decision makers with sufficient information to understand the scale and geographic scope of any detrimental, or benefit, impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.

Air quality and green infrastructure

- 1.1.144.** Overall, vegetation and trees are regarded as beneficial for air quality, but they are not a solution to the air quality problems at a city scale, reducing vehicle journeys and adopting behavioural changes is key to improve our air quality.
- 1.1.145.** The value of green infrastructure for urban air quality lies in its ability, not to remove pollution, but rather to control the distribution by strategically enhancing (or reducing) its dispersion close to its source for example at the roadside. It acts as a barrier that reduces the public exposure to what is emitted and thereby further improve public health outcomes. However, we still need to create environments that incentivise behaviour changes in the way we travel and encourages walking, cycling and other sustainable modes. The design quality of our streets is crucial in producing attractive environments at a human scale, with reduced air and noise pollution and opportunities to connect with nature.

Air quality and combined Heat and Power (CHP)

- 1.1.146.** Some carbon reduction measures for energy generation and spatial heating can adversely impact local air quality if not properly mitigated. The use of individual Combined Cooling, Heating and Power (CCHP), Combined Heat and Power (CHP) and Biomass to produce heat and power can deliver significant reductions of CO₂. However, the use of these technologies could also lead to increases in NO₂ and particle emissions. Therefore, their air quality impacts need to be assessed as part of an Air Quality Assessment. CHP or other combustion-based technologies that cannot demonstrate that they will have acceptable impacts will not be accepted and instead the use of other sustainable energy generation air quality neutral technologies should be used which reduce both CO₂ and NO₂ emissions.

Air quality, pollutants and transport

- 1.1.147.** We will ensure that new development in Merton is adequately managed and integrated with the transport network, including public transport, pedestrian and cycle networks, to enable it to accommodate growth in a sustainable manner, so that it does not contribute further to air quality deterioration, increased noise and congestion. As set out in the Transport Policies, Transport Assessments/Statements will be required for development proposals so that transport impacts of development proposals can be properly identified and addressed.
- 1.1.148.** Freight, servicing and delivery vehicles, particularly heavy goods vehicles are a significant source of noise and air pollution, particularly around commercial and industrial locations. Delivery and servicing trips have been increasing in London which has been accelerated recent rapid market evolution in home delivery for a range of services as a result of the pandemic. However, low carbon alternatives such as electric vans and cargo bike deliveries have also started to appear. Where a development is likely to generate a significant amount of movement by goods or delivery vehicles we will require the development of a Delivery and Servicing Plan in accordance with [TfL's latest guidance](#). A Delivery and Service Plan provides a strategy to improve the safety, efficiency and sustainability of delivery and servicing vehicles through a range of interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours.

Noise and vibration

- 1.1.149.** Noise and vibration pollution affect both health and behaviour. Characteristics that cause or increase noise pollution such as poorly located emission sources, street canyons and noise sources should also be designed out wherever possible. The main source of ambient noise in Merton is road traffic. However, other activities such as construction, busy high or night-time activities may also impact on noise levels. Therefore, it is important that new development assists in reducing potential exposure. Development proposals need to consider acoustic design at an early stage of the planning process to ensure occupiers of new and noise sensitive buildings are protected.
- 1.1.150.** For a long time, the responsibility for managing and mitigating the impact of noise on neighbouring residents and businesses has been placed on the business or activity making the noise, regardless of how long the noise-generating business or activity has been operating in the area. In many cases, this has led to newly arrived residents complaining about noise from existing businesses, sometimes forcing the businesses to close.
- 1.1.151.** The Agent of Change principle, set out in the London Plan (2020) and the National Planning Policy Framework, places the responsibility for mitigating the impact of noise

firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from noise impacts. This could include paying for soundproofing for the existing noise generating uses, such as an existing music venue.

- 1.1.152.** The Agent of Change principle works both ways. If a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.
- 1.1.153.** Noise generating cultural venues such as theatres, concert halls, pubs and live music venues should be protected. This requires a sensitive approach to managing change in the surrounding area. Adjacent development and land uses should be brought forward and designed in ways which ensure established cultural venues still are viable, contribute to the local economy and can continue in their present form without the prospect of licensing restrictions or the threat of closure due to noise complaints from neighbours.
- 1.1.154.** Housing and other noise sensitive development proposed near to an existing noise generating use should include necessary acoustic design measures. This will ensure new development has effective sound insulation to mitigate and minimise potential noise impact or neighbour amenity issues. Mitigation measures should be explored at an early stage in the design process, with necessary and right provisions secured through planning obligations.
- 1.1.155.** Noise from construction during building of developments will be managed through use of planning conditions.

Light pollution

- 1.1.156.** The links of light pollution on human health and wellbeing has been documented for several decades. Recently the effects of light pollution on plants and animals are becoming more known. Light pollution can alter and interferes with the timing of necessary biological activities of wildlife. We will support well designed artificial lighting that, maximises the positive aspects and minimises its impact on local amenity and wildlife.
- 1.1.157.** We will expect new buildings to be designed to minimise light pollution from internal and external lighting. We will use the relevant professional standards as a guide to assessing light impacts such as the Institute of Lighting Professionals.
- 1.1.158.** Lighting can be important for the accessibility of outdoor sports facilities and can help to improve their use. In new developments to help provide a healthy and safe environment it

can also be used to enhance the appearance of some buildings. The form of lighting required will depend on the facility and its use, but efforts should be made to minimise the impact on the surrounding areas, and not to cause a demonstrable harm to the local community, biodiversity or local wildlife. Excessive lighting can have a negative impact on residents' quality of life, adversely affect wildlife, contribute to 'sky glow' and energy waste. Requiring the submission of details of external lighting in line with the recommendations of the Institute of Lighting Professionals for approval will allow external lighting and its impacts to be controlled and minimised.

Odours and Fume Control

- 1.1.159.** Some commercial activities can have an impact upon the local environment. These impacts can include such things as odours, fumes, dust and steam. It is important that activities that create odour do not affect the surrounding amenity or the adjoining highway. Where appropriate, we will require odour assessments to make sure potential impacts are appropriately mitigated. Permitted development rights mean that some developments can accommodate a wide range of uses without the need for planning permission to change between them. Proposals for such uses, such as hot food premises, will require mitigation measures to be incorporated to prevent unacceptable odour issues arising in the future.
- 1.1.160.** As part of the development process we require that steps be taken to ensure that any impact is considered carefully, and that mitigation is in place to manage these types of emissions. Applicants will be needed to apply the Department for Environment, Food and Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems.

Land Contamination

- 1.1.161.** Industrial activity, waste disposal, accidental spillages and transportation can cause contamination of land. Often this contamination is associated with industrial processes or activities which are now not active, such as former printworks and other activities that were part of the Wandle Valley's industrial heritage. According with the requirements of the Environmental Protection Act 1990, we maintain a register of contaminated land sites in the borough. We will require developers to undertake a site investigation of any contamination of sites. The investigation must prove the nature and extent of the contamination prior to determining the application.
- 1.1.162.** Where development is proposed on a site that is known or believed to be contaminated, the need to carry out remediation or monitoring and to ensure adequate disposal of contaminated soil will be secured by planning conditions. We will consult and seek advice from Environment Agency when considering applications on contaminated land.

- 1.1.163.** The redevelopment of previously developed land (or 'brownfield') sites for beneficial uses, many of which are potentially affected by contamination, provides an opportunity to deal with the potential risks posed by contamination to human health and the natural environment.
- 1.1.164.** Contamination sensitive development would typically include developments that potentially put people in direct contact with contamination, such as a new home, parks and open space or school uses.
- 1.1.165.** Hazardous Gas Installations also affects parts of Merton. We will consult the Health and Safety Executive (HSE) on planning applications using methodology and software known as PADHI, which is available online. The HSE provides advice on safety grounds as to whether planning permission should be granted. Information on whether a site is affected by this requirement is available from the council.

Construction and demolition

- 1.1.166.** There is a need to ensure that occupiers are protected from environmental disturbances during the construction and demolition phase of major developments, and during excavating and construction of subterranean developments such as basements.
- 1.1.167.** We expect applicants and contractors to mitigate the construction impact, to implement good site management and communication, and proactively engage with the local community and affected residents. Innovative methods of construction to reduce nuisance and emissions from construction should be implemented where possible.
- 1.1.168.** We requires the submission of Construction Management Statements (CMS) for the types of developments as set out in the policy. In addition, [Merton's Basement and Subterranean SPD 2017](#), sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours, are avoided.
- 1.1.169.** To manage the environmental impacts and ensure that the Construction Management Statements are adhered to, we will seek a charge to the applicant/developer to cover the cost of monitoring the CMS. Where an applicant/developer uses the Merton Council Building Control, a discount may be applied to this charge.
- 1.1.170.** We may also require a management plan that sets out how developers monitor dust, noise and vibration, and where necessary take the action if issues arise. It will also be necessary to control the hours of operation for noisy site works and the processes that would need to be followed to work outside these hours when and if required.

- 1.1.171.** In line with the transport policies, we may also require a Construction Logistics Plan (CLP) in areas that are subject to high traffic congestion to ensure that vehicles entering the site do not adversely impact on local traffic.
- 1.1.172.** As part of our commitment to better air quality, we will also ask, through planning conditions, that the current regulations relating to Non-Road Mobile Machinery (NRMM) is imposed where necessary.



12. APPENDICES

Open space

These open spaces are illustrated on the Policies Map.

Metropolitan Open Land (MOL)

Site	Name	Area
1	Cannon Hill	Raynes Park
2	Wimbledon Park	Wimbledon
3	Lower Morden	Morden
4	Beverly Brook/A3	Raynes Park
5	Copse Hill	Raynes Park
12	Wimbledon Common	Wimbledon
14	Mitcham Common	Mitcham
16	Morden Park	Morden
18	Wandle Valley	Morden

Open Space - Allotments and Farms

Site	Name	Area
A001	Western Road Allotments	Mitcham
A002	Martin Way East Allotments	Raynes Park
A003	Eastfields Road Allotments	Mitcham
A004	New Barnes Avenue Allotments	Mitcham
A005	Thurleston Avenue Allotments	Morden
A006	Eveline Road Allotments	Mitcham
A007	Effra Road Allotments	Wimbledon
A008	George Hill, Holne Chase Allotments	Mitcham
A009	Ridge Road Allotments	Mitcham
A010	Cottenham Park Allotments	Wimbledon
A011	Martin Way West Allotments	Morden
A012	Cannon Hill Common Allotments	Raynes Park
A013	Arthur Road Allotments, New Malden	Raynes Park
A014	Tamworth Farm Allotments, Rose Avenue	Mitcham
A015	Phipps Bridge Allotments	Mitcham
A016	Durnsford Road Allotments, Gap Road	Wimbledon
A017	Haslemere Avenue Allotments	Wimbledon
A018	Cannizaro Park Allotments	Wimbledon
A019	Brooklands Avenue Allotments	Wimbledon
A020	Havelock Road Allotments	Wimbledon
F001	Deen City Farm	Morden

A021	Mary Tate Almshouses Allotments	Mitcham
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Open Space - Churchyards and Cemeteries

Site	Name	Area
C001	Buddhapadipa Temple Grounds	Wimbledon
C002	St Mary's Church, Wimbledon	Wimbledon
C003	Merton & Sutton Joint Cemetery	Morden
C004	Streatham Park Cemetery	Mitcham
C005	London Road/Victoria Road Cemetery	Mitcham
C006	Gap Road (Wimbledon) Cemetery	Wimbledon
C007	Morden Cemetery	Morden
C008	Mitcham Parish Church	Mitcham
C009	St Marys Churchyard, Merton Park	Morden

Open Space – Education

Site	Name	Area
S001	Ricards Lodge	Wimbledon
S002	Kings College School Playing Field	Wimbledon
S003	Farm Road Playing Fields	Morden
S004	Harris Academy Morden	Morden
S005	Wimbledon Chase Primary School	Wimbledon

Site	Name	Area
S006	Cranmer Primary	Mitcham
S007	Abbotsbury School	Morden
S008	Raynes Park High High School	Raynes Park
S009	Wimbledon High School Sports Ground	Wimbledon
S010	Hillcross Primary School	Morden
S011	Wimbledon College	Wimbledon
S012	Bond Primary School	Mitcham
S013	Haslemere Primary School	Mitcham
S014	Cricket Green School	Mitcham
S015	Harris Primary Academy (former Garden Primary School)	Mitcham
S016	Malmesbury School	Morden
S017	Merton Abbey Primary and Harris Wimbledon Academy	Colliers Wood
S018	Benedict Primary School	Mitcham
S020	Stanford Primary School	Mitcham
S021	Priory Church Of England	Wimbledon
S022	Beecholme School	Mitcham
S023	Wimbledon College Sports	Raynes Park
S024	Goals Wimbledon	Raynes Park
S025	St John Fisher School	Raynes Park
S027	Kings College School Sports Ground	Raynes Park
S028	Aragon Primary	Morden
S029	Hatfield Primary School	Morden
S030	Poplar School	Morden

Site	Name	Area
S031	Rutlish High School	Wimbledon
S032	Harris Academy Merton	Mitcham
S033	St Marks Church of England Academy	Mitcham
S035	Holy Trinity	Wimbledon
S036	St Thomas Of Canterbury	Mitcham
S037	Liberty Primary School	Mitcham
S038	St Teresa's Primary	Morden
S039	Bishop Gilpin, Lake Road	Wimbledon
S040	Garfield School, Garfield Road	Colliers Wood
S041	Lonesome Primary, Grove Road	Mitcham
S042	Morden Primary School, London Road	Morden
S043	West Wimbledon Primary	Raynes Park
S044	Emmanuel School Playing Fields	Raynes Park
S045	St Matthew's Church of England Primary School (former Oberon Playing Fields)	Raynes Park
S046	Wimbledon Park Primary School	Wimbledon
S047	Wimbledon College Prep Donhead	Wimbledon
S048	The Norwegian School Playing Fields	Raynes Park
S049	Hollymount School Playing Fields	Wimbledon
S050	Ursuline High School	Raynes Park
S051	Melrose School	Mitcham
S052	St Marks Primary School	Mitcham
S053	Perseid Upper Playing Fields (formerly St Anns)	Morden
S054	Joseph Hood Primary School	Wimbledon

Site	Name	Area
S055	Merton College	Morden
S056	Sacred Heart Catholic Primary School	Raynes Park
S057	Links Primary School Playing Fields	Mitcham
S058	Gorringe Park Primary School Playing Fields, Sandy Lane	Mitcham
S059	Singlegate Primary School	Colliers Wood
S060	Pelham Primary School, Russell Road	Wimbledon
S061	Merton Park Primary School, Church Lane	Morden
S062	All Saints C of E Primary School, East Road	Colliers Wood
S063	St Marys RC Primary School	Wimbledon
S064	SS Peter and Paul RC Primary, Cricket Green	Mitcham

Open space - All other open spaces

Site	Name	Area
CG001	Arthur Road Commercial Plant Nursery	Raynes Park
M001	Morden Hall Park	Morden
M002	Figges March	Mitcham
M003	Three Kings Piece	Mitcham
M004	London Road Playing Fields	Mitcham
M005	Wandle Park	Colliers Wood
M006	Dundonald Recreation Ground	Wimbledon

Site	Name	Area
M007	Cranmer Green	Mitcham
M008	Moreton Green	Morden
M009	Lavender Park	Mitcham
M010	Durnsford Road Rec	Wimbledon
M011	Haydons Road Rec	Wimbledon
M012	Colliers Wood Rec	Colliers Wood
M013	Cottenham Park	Raynes Park
M014	Donnelly Green Open Space	Mitcham
M015	Myrna Close Open Space	Mitcham
M016	John Innes Park	Morden
M017	South Park Gardens	Wimbledon
M018	Cherry Tree Estate Open Space	Mitcham
M019	Cherrywood Open Space	Morden
M020	Brenley Park	Mitcham
M021	Lyndhurst Rec	Mitcham
M022	Holland Gardens	Raynes Park
M023	Sherwood Park Road	Mitcham
M024	Kendor Gardens	Morden
M025	Vestry Hall Green	Mitcham
M026	Rowan Road Rec	Mitcham
M027	Church Lane Playing Fields	Wimbledon
M028	Lynmouth Gardens	Morden
M029	Deer Park Gardens	Mitcham
M030	Lewis Road Rec	Mitcham

Site	Name	Area
M031	Moreton Green	Morden
M032	Miles Road Open Space	Mitcham
M033	Upper Green (also known as Fair Green)	Mitcham
M034	All Saints Rec	Colliers Wood
M035	Nelson Gardens	Colliers Wood
M036	Margin Drive Open Space	Wimbledon
M037	Vectis Gardens	Mitcham
M038	Poplar Court Open Space	Wimbledon
M039	Rock Terrace Rec	Mitcham
M040	Oakleigh Way Recreation Ground	Mitcham
M043	Crooked Billet Open Space	Wimbledon
M044	Wimbledon Common (excluding Royal Wimbledon Golf Course)	Wimbledon
M046	Raynes Park Sports Ground	Raynes Park
M047	Cannon Hill Common	Raynes Park
M048	Sir Joseph Hood Memorial Playing fields	Raynes Park
M049	King Georges Field	Morden
M050	Morden Park	Morden
M051	Mostyn Gardens	Morden
M052	John Innes Recreation Ground	Morden
M053	Ravensbury Park	Mitcham
M054	Cricket Green	Mitcham
M055	Police Green	Mitcham
M056	Mitcham Common	Mitcham

Site	Name	Area
M057	Mitcham Sports Ground	Mitcham
M058	The Canons	Mitcham
M059	Pollards Hill Open Space	Mitcham
M060	Long Bolstead Rec	Mitcham
M061	Tamworth Farm Rec	Mitcham
M062	Abbey Rec	Wimbledon
M063	Garfield Road Rec	Wimbledon
M064	Land Adjacent River Wandle	Colliers Wood
M066	Morden Recreation Ground	Morden
M067	Edenvale Play Area	Mitcham
M068	Wandle Meadow Nature Park	Colliers Wood
M069	St Mary's Churchyard and field, Merton Park	Morden
M070	Robinhood Close Open Space	Mitcham
M071	Watermeads	Morden
M072	Joseph Hood Recreation Ground	Morden
M074	Merton & Sutton Joint Cemetery Surrounds	Morden
M075	St Mary's Churchyard and field	Wimbledon
M076	Rowan Park	Mitcham
M077	Wimbledon Park	Wimbledon
M078	Land adjacent to River Wandle	Wimbledon
M078	Seymour Road Park	Wimbledon
M079	Alfreton Close Corner Park	Wimbledon
M080	Welford Park and Path	Wimbledon
M082	Herbert Road Park	Wimbledon

Site	Name	Area
M083	St Mark's Church	Wimbledon
M084	Edge Hill Court North	Wimbledon
M085	Edge Hill Court South	Wimbledon
M086	All Saints Road Open Space	Wimbledon
M087	Bushey Court Park	Raynes Park
M088	Three Kings Piece Open Space	Mitcham
M089	Marlowe Square Open Space	Mitcham
M090	Recreation Way Open Space	Mitcham
M091	Crossway Open Space	Raynes Park
M092	Trafalgar Garden	Colliers Wood
M093	Hamilton Gardens Open Space	Colliers Wood
M094	Hardy Gardens Open Space	Colliers Wood
M095	Caesars Walk Open Space	Mitcham
M096	Central Ward Residents Club	Morden
M097	Haynt Walk Open Space	Raynes Park
M098	Botsford Road Open Space	Wimbledon
M099	Trenchard Court Haig Homes Open Space, Green Lane	Morden
M100	The Precincts Haig Homes Open Space, Green Lane	Morden
M101	St Helier Avenue Open Space	Morden
M102	Home Park Road Open Space	Wimbledon
M0103	Hertford Way Open Space	Mitcham
M0104	Wimbledon War Memorial	Wimbledon
M0105	Dennis Park Crescent Open Space	Wimbledon

Site	Name	Area
P001a	Natwest Sports Ground	Mitcham
P002	Raynes Park Playing Fields	Raynes Park
P004	Raynes Park High School Sports Ground	Raynes Park
P005	Malden Golf Course	Raynes Park
P006	LESSA Sports Ground, Meadowview Road	Raynes Park
P007	Playing Field Wimbledon College	Raynes Park
P008	The Old Rutlishians Sports Club	Morden
P009	West Side Lawn Tennis Club	Wimbledon
P010	Queensmere Road Tennis Courts	Wimbledon
P012	Wilton Grove Tennis Club	Wimbledon
P014	Raynes Park Residents Open Space	Raynes Park
P015	Wimbledon Bowling Club	Wimbledon
P016	Merton Hall Bowling Green	Wimbledon
P017	Royal Wimbledon Golf Club, Camp Road	Wimbledon
P018	Morley Park	Raynes Park
P020	Civil Service Sports Ground	Raynes Park
P021	Beverley Park Golf Range	Raynes Park
P022	Prince Georges Fields	Morden
P023	Messines Playing Fields	Morden
P024	Old Tenisonians Sports Ground	Raynes Park
P025	Morden Playing Fields	Morden
P026	Cranleigh Lawn Tennis Club	Morden
P027	Nursery Road Playing Fields	Wimbledon
P028	Mitcham & Mitcham Imperial Sports Ground	Morden

Site	Name	Area
P030	Westminster City School Playing Fields	Mitcham
P033	Morden Sports Ground	Raynes Park
P034	The David Lloyd Club	Raynes Park
P035	All England Lawn Tennis Club	Wimbledon
P036	Former St Catherine's Playing Fields	Raynes Park
P037	BMX track	Mitcham
P038	Southey Bowling Club	Raynes Park
W001	George Hill Open Space and Pyl Brook Nature Reserve	Morden
W002	Priory Wall Open Space Walk, Priory Road	Colliers Wood
W003	Land Along Wandle River	Wimbledon
W004	River Wandle riverside walk (also known as Bennett's Hole).	Mitcham
W005	Land Adjacent River Wandle	Colliers Wood
W006	Merton Park Green Walk	Morden
W007	Rookwood Open Space, Rookwood Avenue	Raynes Park

Nature Conservation

These areas of SSSI, SINCs and Local Nature Reserves are illustrated on the Policies Map.

Sites of Special Scientific Interest ('European Sites')

Site	Name	Area
N/A	Wimbledon Common	Wimbledon

Sites of Metropolitan Importance for Nature Conservation

Site	Name	Area
M093	Mitcham Common	Mitcham
M136	Morden Cemetery	Morden
M091	The Upper River Wandle	Morden
M101	Wimbledon Common and Putney Heath	Wimbledon

Sites of Borough (Grade 1) Importance for Nature Conservation

Site	Name	Area
01	Morden Hall Park and Deen City Farm	Morden
02	Wimbledon Park – Merton section	Wimbledon
03	Royal Wimbledon Golf Course south	Wimbledon
04	Wandle Trail Nature Park and the Lower River Wandle	Wimbledon
05	Sir Joseph Hood Memorial Wood	Raynes Park
06	Worcester Park Green Lanes	Morden
07	Malden Golf Course and TWU Pipe Track	Raynes Park
08	Cannizaro Park	Wimbledon
09	Morley Park Woodland	Raynes Park
10	Cannon Hill Common	Raynes Park
11	Morden Park	Morden

Sites of Borough (Grade 2) Importance for Nature Conservation

Site	Name	Area
01A	Streatham Junction to Wimbledon Railsides	Wimbledon
01B	East Wimbledon Railsides	Wimbledon
01C	District line through Wimbledon	Wimbledon
01D	Wimbledon to Dundonald Road Tramlink	Wimbledon
01E	Railsides west of Wimbledon station	Wimbledon
01F	Sutton Line South of Wimbledon	Wimbledon

Site	Name	Area
02	Derwent Road Floodwash	Morden
03	Lower Pyl Brook	Morden
04	Pyl Brook Nature Reserve	Morden
05	Beverly Brook in Merton	Raynes Park
06	Oakleigh Way Nature Area	Mitcham
08	Cherrywood	Morden
09	Abbotsbury School Meadowlands	Morden
10	Myrna Close Valley	Colliers Wood
11	Budhhapadipa Temple Grounds	Wimbledon
12	Merton Park Green Walks	Morden
13	Prince Georges Playing Field	Raynes Park
14	Coombe Wood	Wimbledon
15	Ravensbury Park	Mitcham
16	Durnsford Wetland	Wimbledon
17	St Peter and St Paul Churchyard	Mitcham
18	Wandle Park	Colliers Wood
19	London Road Playing Fields	Mitcham

Sites of Local Importance for Nature Conservation

Site	Name	Area
01	Park House Middle School Conservation Area	Wimbledon
03	Church Lane Playing Field	Morden
04	St Mary's Churchyard and Glebe Fields	Morden
05	Poplar First School Nature Area	Morden
06	Eltandia Hall Nature Area	Mitcham
08	Morden Recreation Ground Spinney	Morden
09	Moreton Green	Morden
10	Three Kings Pond and Commonsides Rough	Mitcham
11	Cranmer Green Meadow and Pond	Mitcham
12	Liberty Middle School Conservation	Mitcham
13	The Chase	Wimbledon
14	St Mary's RC Primary School Nature Garden	Wimbledon
16	St Mary's Churchyard	Wimbledon
18	Canons Pond	Mitcham
19	Raynes Park Sports Ground Wildlife Area	Raynes Park
20	Pyl Brook by Garth Road	Morden
21	St Laurence's Churchyard	Morden
22	Haig Homes Estate	Morden

Local Nature Reserves

Site	Name	Area
01	Bennett's Hole	Mitcham
02	Cannon Hill Common	Raynes Park
03	Cherry Wood	Morden
04	Cranmer Green	Mitcham
05	Derwent Floodwash (proposed)	Morden
06	Fishponds Wood/ Beverley Meads	Wimbledon
07	Lower Wandle	Wimbledon
08	Merton Green Walks	Morden
09	Morden Park	Morden
10	Myrna Close	Colliers Wood
11	Oakleigh Way	Mitcham
12	Pyl Brook	Morden
13	Ravensbury Park	Mitcham
14	Sir Joseph Hood Memorial Wood	Raynes Park
15	Wandle Meadow Nature Park	Colliers Wood

Green Corridors

These Green Corridors are illustrated on the Policies Map.

Green Corridors

Site	Name	Area
GC01	Beverley Park	Raynes Park
GC04	Merton Park Railsides	Morden
GC05	Mitcham Common	Mitcham
GC06	Cricket Green & The Canons Recreation Ground	Mitcham
GC08	Mitcham Sports Ground	Mitcham
GC09	Morden Cemetery	Morden
GC10	Morden Park	Morden
GC12	Mostyn Gardens	Morden
GC13	Phipps Bridge and London Road Playing Fields	Mitcham
GC14	Ravensbury Park	Mitcham
GC15	Raynes Park High School	Raynes Park
GC16	Raynes Park Railsides	Raynes Park
GC17	Raynes Park Railsides to Motspur Park	Raynes Park
GC18	Ricards Lodge	Wimbledon
GC19	Ridge Road to Wimbledon Park	Wimbledon
GC22	Wimbledon Common	Wimbledon
GC23	Wimbledon Park	Wimbledon
GC24	Wimbledon Railsides	Wimbledon

Conservation Areas, Historic Parks and Gardens and Listed Buildings

Conservation Areas

Code	Name	Area (ha)	Code	Name	Area (ha)
1	Lambton Road	7.65	15	South Park Gardens	13.60
2	Dennis Park Crescent	3.80	16	Wimbledon North	137.80
3	Drax Avenue	8.58	17	Upper Morden	89.20
4	Dunmore Road	1.70	18	Vineyard Hill Road	6.86
5	Bathgate Road	11.45	19	Mitcham Cricket Green	52.00
6	Bertram Cottages	1.00	20	Westcoombe Avenue	1.70
7	The Broadway	3.00	21	John Innes- Merton Park	30.40
8	Copse Hill	19.72	22	Merton Hall Road	6.28
9	Wimbledon Windmill	1.02	23	Wool Road	13.12
10	Wimbledon Village	6.60	24	Wimbledon West	114.30
11	John Innes- Wilton Crescent	10.37	25	Wandle Valley	93.90
12	Wimbledon Hill Road	11.23	26	Durham Road	3.19
13	Pelham Road	1.50	27	Kenilworth Avenue	2.58
14	Wimbledon Chase	3.25	28	Leopold Road	0.65
			29	The Canons	8.4

Historic Parks and Gardens

Cannizaro Park, Wimbledon	Grade 11*
Wimbledon Park, Wimbledon	Grade 11*
Morden Hall Park, Morden	Grade 11
South Park Gardens	Grade 11

List of Buildings of Special Architectural or Historic Interest

The buildings are classified in grades to show their relative importance as follows:

Grade I These are buildings of exceptional interest.

Grade 11* (“two stars”): particularly important buildings which are of more special interest.

Grade 11: These are buildings of special interest, which warrant every effort being made to preserve them.

Historic England lists buildings and structures and hold the most up-to-date information on listed buildings and structures, which is available via their website:

<https://historicengland.org.uk/listing/the-list/>

Property	Street/ Road Name	Grade
Church of all Saints	All Saints Road, SW19	11
No.1 (Stag Lodge)	Arthur Road, SW19	11
No.19 (The Artesian Well)	Arthur Road, SW19	11
No.16	Arthur Road, SW19	11
No. 157 (Butcher's Shop)	Arthur Road SW19	11
No.7	Belvedere Drive, SW19	11
No.1	Belvedere Drive, SW19	11
Ice House at No 1	Belvedere Drive, SW19	11
No.12	Belvedere Drive, SW19	11
No.14	Belvedere Drive, SW19	11
No.4	Belvedere Square	11
No.13	Belvedere Square	11
No.5-8 (Consec.)	Belvedere Square, SW19	11
No.9-12 (Consec.)	Belvedere Square, SW19	11
No. 17-20 (Consec.)	Belvedere Square, SW19	11

Property	Street/ Road Name	Grade
No. 21-26 (Consec.)	Belvedere Square, SW19	11
No. 27-31 (Consec.)	Belvedere Square, SW19	11
No.13 and 14	Berkeley Place, SW19	11
Wimbledon Theatre	The Broadway, SW19	11
Former Wimbledon Town Hall	The Broadway, SW19	11
No.21	Calonne Road, SW19	11
No. 28, 30 and 32	Calonne Road, SW19	11
William Wilberforce School	Camp Road, SW19	11
Statue of Diana with Fawn	Cannizaro Park, Wimbledon, SW19	11
Old School House	Central Road, Morden	11
The Grange	Central Road, Morden	11
Colliers Wood LUL Station	Christchurch Road, Colliers Wood, SW19	11
No.70	Christchurch Road, Colliers Wood, SW19	11
Singlegate School and Catepiers	Christchurch Road, Colliers Wood, SW19	11

Property	Street/ Road Name	Grade
Garden Wall (4 sides) Church Field, including iron gate north of Mary's Church	Church Lane, Merton, SW19	11
Church of St Mary	Church Path, Merton, SW19	11*
Freestanding 12C Archway	Church Path, Merton, SW19	11
Garden Wall (4 sites) Church Field, north of St Mary's Church	Church Path, Merton, SW19 Duplicate	11
Nos. 60, 62 and 64 with railings and date to No.64	Church Road, Mitcham	11
No.66	Church Road, Mitcham	11
Parish Church of St Peter and St Paul	Church Road, Mitcham	11*
Tomb of Anne Hall (Died 1740)	St Peter and St Paul Churchyard, Church Road, Mitcham	11
Tomb of Thomas Stanley (Died 1811)	St Peter and St Paul Churchyard, Church Road, Mitcham	11
Tomb of Richard Cranmer (Circa Early 19C)	St Peter and St Paul Churchyard, Church Road, Mitcham	11
Table Tomb one yard to west of Tomb of Richard Cranmer	St Peter and St Paul Churchyard, Church Road, Mitcham	11

Property	Street/ Road Name	Grade
The Former Vicarage of St Peter and St Paul	Church Road, Mitcham	11
The Old Rectory House	Church Road, Wimbledon	11*
No.16-20 (Even)	Church Road, Wimbledon, SW19	11
No.22-26 (Even)	Church Road, Wimbledon, SW19	11
No.55	Church Road, Wimbledon, SW19	11
No.9 Prospect Housing (including No.11)	Church Road, Wimbledon, SW19	11
No.1 (Newton House)	Commonside East, Mitcham	11
No.54 (Park Place)	Commonside West, Mitcham	11
Cote Cottage	28 Conway Road SW20 Commonside West, Mitcham	11
Christ Church	28 Cottenham Park Road, London, SW20	11
Nos.15 and 17	Copse Hill, SW20	11
No. 11 Colbyfield	Copse Hill, SW20	11
Nos. 19 and 21	Copse Hill, SW20	11
No.23	Copse Hill, SW20	11

Property	Street/ Road Name	Grade
No.27	Copse Hill, SW20	11
No.27 (Formerly Stables)	Copse Hill, SW20	11
No.1 (Elm Lodge)	Copse Hill, SW20	11
Methodist Church	Cricket Green, Mitcham	11
The White House	Cricket Green, Mitcham	11
No.9 (Chestnut Cottage)	Cricket Green, Mitcham	11
Obelisk	Junction with Madeira Road, Cricket Green, Mitcham	11
Tate Almshouses	Cricket Green, Mitcham	11
Drinking Fountain and Horse Trough	Cricket Green, Mitcham	
Nos. 17-20 (Consec.)	Crooked Billet, SW19	11
Bidder Memorial	Croydon Road, Mitcham	11
Church of the Sacred Heart	Darlaston Road, SW19	11*
Churchyard Wall and Gateways to West and South of Church of Sacred Heart	Darlaston Road, SW19	11
Nos. 47-51	Denmark Road, SW19	11

Property	Street/ Road Name	Grade
Nos. 52 and 53	Denmark Road, SW19	11
Nos. 54-59 (Consec.)	Denmark Road, SW19	11
Nos. 60 and 61	Denmark Road, SW19	11
Nos. 62 and 63	Denmark Road, SW19	11
Nos. 64-71 (Consec.)	Denmark Road, SW19	11
Nos. 72 and 73	Denmark Road, SW19	11
No. 2a	Drax Avenue, SW19	11
Horse Trough/ Drinking Fountain	South Park Gardens, Dudley Rd, SW19	11
Former World War 1, Type G, RNAS Seaplane Shed: Network Rail, Wimbledon Depot	Dundonald Road (accessed from)	11
Wimbledon College	Edge Hill	11
Cottage with Cartshed 10 yards to South West of Hall of Wimbledon College	Edge Hill	11
Church of St Barnabas	Gorrington Park Avenue, Mitcham	11
Church Hall of St Barnabas	Gorrington Park Avenue, Mitcham	11
No.1	The Grange, SW19	11

Property	Street/ Road Name	Grade
No.2	The Grange, SW19	11
No.7 (Fra Lunor)	The Grange, SW19	11
No.6	The Green, SW19	11
No.7 (Holly Cottage)	The, Green SW19	11
No.2 (Good Hope)	Highbury Rd., SW19	11
No.2 Motor House	Highbury Rd., SW19	11
Wall, West Side of River Pickle (Medieval)	High Street, Colliers Wood, SW19	11
Colliers Wood, LUL Station	High Street, Colliers Wood, SW19	11
Drinking Fountain in Wandle Park	High Street, Merton, SW19	11
South Wimbledon LUL Station	High Street, Merton, SW19	11
Nos 32, 33, 33A and 34	High Street, Wimbledon, SW19	11
No. 35	High Street, Wimbledon, SW19	11
No. 37 and 37A	High Street, Wimbledon, SW19	11
No. 38	High Street, Wimbledon, SW19	11

Property	Street/ Road Name	Grade
Nos. 38A, 38B, 38C 39, 39A, 39B (Ashford House)	High Street, Wimbledon, SW19	11
No.44 (Claremount House), 45 and 45A War Memorial	Junction with Parkside, High Street, Wimbledon, SW19	11
Eagle House	High Street, Wimbledon, SW19	11
Iron Screen, Gate Piers and Gates to Eagle House	High Street, Wimbledon, SW19	11
No.57 including Nos. 1, 3 and 5 Lancaster Road	High Street, Wimbledon, SW19	11
Nos. 70 and 70A/ 70B	High Street, Wimbledon, SW19	11
No.98	High Street, Wimbledon, SW19	11
267A, 269 (Long Lodge)	Kingston Road, SW19	11
120 (The Manor House)	Kingston Road, SW19	11
Dorset Hall	Kingston Road, SW19	11
K6 Telephone Kiosk (outside 182)	Kingston Road, SW19	11
1, 3 and 5	Lancaster Road, SW19	11
No. 27	Lancaster Road, SW19	11
No. 1	Lauriston Road SW19	11

Property	Street/ Road Name	Grade
No. 9	Lauriston Road, SW19	11
No. 15 and 15A	Lauriston Road, SW19	11
No. 17	Lauriston Road, SW19	11
No. 26 (The Village Club)	Lingfield Road, SW19	11
Nos. 109-111 (Odd)	London Road, Mitcham	11
Clock Tower at Junction with Upper Green East	London Road, Mitcham	11
Nos. 315 Burn Bullock Public House	London Road, Mitcham	11
Nos. 409 and 411(Mitcham Station)	London Road, Mitcham	11
Nos. 475-479 (Odd) (Mill Cottages)	London Road, Mitcham	11
Milestone on Figges Marsh (Opposite Entrance to St James' Road)	London Road, Mitcham	11
No. 244 (Eagle House)	London Road, Mitcham	1
Forecourt Walls, Piers, Railings and Gates of Eagle House	London Road, Mitcham	1

Property	Street/ Road Name	Grade
Milestone Opposite Elm Lodge	London Road, Mitcham	11
Nos. 346 and 348	London Road, Mitcham	11
No. 350 (White Hart Inn)	London Road, Mitcham	11
Nos. 470 and 472	London Road, Mitcham	11
Nos. 482 and 484	London Road, Mitcham	11
Church of St Lawrence	London Road, Morden	1
Tomb in Churchyard, 5 yards South West of Tower	Churchyard of St Lawrence, London Road, Morden	11
Mauvillian Tomb in Churchyard, Church of St Lawrence	Churchyard of St Lawrence, London Road, Morden	11
Headstone to John Howard (D1764) in Churchyard 16 yards to South of South Porch	Churchyard of St Lawrence, London Road, Morden	11
Headstone circa mid to late 18C immediately adjacent to south of Headstone of John Howard in Churchyard of St Lawrence	London Road, Morden	11

Property	Street/ Road Name	Grade
Morden Park House including walls and pair of Circular Garden Buildings attached to North West	London Road, Morden	11*
Drinking Fountain and Horse Trough	London Road, Morden	11
Milestone	London Road, Morden	11
Milestone Opposite Elm Lodge	Lower Green West, Mitcham	11
Mitcham Parish Rooms	Lower Green West, Mitcham	11
Remains of Hall Place (Chapel)	Lower Green West, Mitcham	11
The Canons	Madeira Road, Mitcham	11*
Dovecote court Adjacent to Pond to South East of the Canons	Madeira Road, Mitcham	11
Obelisk at the junction with Cricket Green (formerly with the ground of if the Canons)	Lower Green West, Mitcham	11
Trinity United Reform Church	Mansel Road, SW19	11
Tooting Police Station	Mitcham Road (251), SW17	11

Property	Street/ Road Name	Grade
Church of St Winefride	Merton Road, SW19	11
Morden Hall	Morden Hall Park, Morden	11
Gates and Gate Piers to Main Entrance to East of Morden Hall, including attached wall to North	Morden Hall Park, Morden	11
Walls if Walled garden to South of Morden Hall	Morden Hall Park, Morden	11
Morden Cottage	Morden Hall Park, Morden	11
Snuff Mills (Western Block)	Morden Hall Park, Morden	11
Snuff Mills (Eastern Block)	Morden Hall Park, Morden	11
Pedestal and Statue of Neptune 10 yards to South East of Walled Garden	Morden Hall Park, Morden	11
Pedestal and Statute of Venus and Cupid 50 yards N. of Morden Cottage	Morden Hall Park, Morden	11
Morden Lodge	Morden Hall Park, Morden	11
Cast Iron Bridge to rear of Morden Hall	Morden Hall Road (East Site)	11
Milestone (opposite No. 92)	Morden Hall Park, Morden	11

Property	Street/ Road Name	Grade
White Cottage	Morden Road, Mitcham	11
Ravensbury Mill	Morden Road, Mitcham	11
South Wimbledon LRT Station including shops	Morden Road, SW19	11
“Flint Barn” No 35	Mostyn Road, Merton Park, SW19	11
No.22	Parkside, SW19	11*
No.36 (Falconhurst)	Parkside, SW19	11
No. 54 (Apostolic Nunciature)	Parkside, SW19	11
Drinking Fountain & Castle/ Horse Trough	Parkside, SW19	11
No. 25 Well-House in Garden	Parkside, SW19	11
Horse Trough	Parkside, SW19	11
Pelham High School (Downham House)	Pelham Road, SW19	11
No.98 Wandle Villa	Phipps Bridge Road, SW19	11
Fire Station	Queens Road, SW19	11
No. 54	Ridgway, SW19	11

Property	Street/ Road Name	Grade
Pair of Gate Piers to No. 54	Ridgway, SW19	11
Nos. 56, 56A, 56C and No. 1 Lauriston Road	Ridgway, SW19	11
No. 70	Ridgway, SW19	11
2 K6 Telephone Kiosks near junction with Murray Road	Ridgway, SW19	11
No. 10 (Wandle House)	Riverside Drive, Mitcham	11
St Luke's Church	Ryfold Road, Wimbledon Park	11
Queen Alexandra's Court (North Block)	St Mary's Road, SW19	11
Queen Alexandra's Court (North Eastern Block)	St Mary's Road, SW19	11
Queen Alexandra's Court (South Eastern Block)	St Mary's Road, SW19	11
Queen Alexandra's Court (Southern Block)	St Mary's Road, SW19	11
Garden Wall to West of Quadrangle forming Queen Alexandra's Court	St Mary's Road, SW19	11
Entrance Gates, Gate Piers and Adjoining Walls to Queen Alexandra's Court	St Mary's Road, SW19	11

Property	Street/ Road Name	Grade
Parish Church of St Mary	St Mary's Road, SW19	11*
Churchyard Walls to South of Churchyard of Church of St Mary	St Mary's Road, SW19	11
Ker Vault, 15 yards to South of Chancel	Churchyard of St Mary's Road, SW19	11
Grosvenor Tomb, 5 yards to South of Chancel	Churchyard of St Mary's Road, SW19	11
Tomb, 1 foot to North of Grosvenor Tomb	Churchyard of St Mary's Road, SW19	11
Savage Tomb, 15 yards to South of South Porch	Churchyard of St Mary's Road, SW19	11
Bingham Tomb, 12 yards from Savage Tomb	Churchyard of St Mary's Road, SW19	11
Tomb of Georgina Charlotte Quin, 1 yard to south west of Savage Tomb	Churchyard of St Mary's Road, SW19	11
Tomb of John Tompkins, 3 yards to west of Savage Tomb	Churchyard of St Mary's Road, SW19	11
Headstone to Eades	Churchyard of St Mary's Road, SW19	11

Property	Street/ Road Name	Grade
Tombstone of Thomas Lowick, 1 yard to west of south porch	Churchyard of St Mary's Road, SW19	11
Hopkin (Mansel Philipps) Tomb, 25 yards to south west of church tower	Churchyard of St Mary's Road, SW19	11
White Tomb, 5 yards to south west of Hopkins (Mansel Philipps) tomb	Churchyard of St Mary's Road, SW19	11
Tomb of G S Newton, 20 yards north west of Tower	Churchyard of St Mary's Road, SW19	11
Headstone, 2 yards to south of Tower	Churchyard of St Mary's Road, SW19	11
Tomb of Geard de Visme, 10 ft to north of west tower of chapel	Churchyard of St Mary's Road, SW19	11
Tomb of Elizabeth Johnson, 50 yards to North West of Tower	Churchyard of St Mary's Road, SW19	11
Tomb, 5 yards to south of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	11
Table Tomb, 4 yards to East of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	11
Tomb, 5 yards to East of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	11

Property	Street/ Road Name	Grade
Hatchet Tomb, 8 yards to East of Tomb of Geard to Visme	Churchyard of St Mary's Road, SW19	11
Tomb of John Lawson, 6 yards to north of chancel	Churchyard of St Mary's Road, SW19	11
Johnson Tomb, 1 yard to north of Tomb to John Lawson	Churchyard of St Mary's Road, SW19	11
Mausoleum of Sir Joseph William Bazalgette, 20 yards to North East of Chancel of St Mary's Church	Churchyard of St Mary's Road, SW19	11
Bankes Tomb, 4 yards to north west of Bazalgette Mausoleum	Churchyard of St Mary's Road, SW19	11
Tomb of Joshua Ruddock, 3 yards to north east of chancel	Churchyard of St Mary's Road, SW19	11
Jennings Tomb, 5 yards to south of Bazalgette Mausoleum	Churchyard of St Mary's Road, SW19	11
Tomb of John Teymme, 6 yards to east of chancel	Churchyard of St Mary's Road, SW19	11
Singlegate School	South Gardens, Colliers Wood	11

Property	Street/ Road Name	Grade
Lauriston Cottage	Southside Common, SW19	11
Great Hall Range to Kings College School	Southside Common, SW19	11
Pillar Box on Pavement to North of Kings College School/ Hall	Southside Common, SW19	11
Church of St John the Baptist	Spencer Hill, Wimbledon, SW19	11
Wall Running Along South Side of Road	Station Road, Merton, SW19	11
Wheel House at Messrs Liberty's Print Works	Station Road, Merton, SW19	11
2 Lampposts outside 12 and 34	Station Road, Merton Abbey, SW19	11
Colour House at Messrs Liberty's Print Works	Station Road, Merton, SW19	11
Nos. 1-5 (Renshaw Corner)	Streatham Road, Mitcham	11
Electricity Sub Station at Junction with Sunnyside Passage	Sunnyside, Wimbledon, SW19	11
Church Hall of St Barnabas' Church	Thirsk Road, Mitcham	11

Property	Street/ Road Name	Grade
Clock Tower	Upper Green East, Mitcham	11
No. 55	Upper Green East, Mitcham	11
Nos. 9-13 (Consec.)	Wandle Bank, Colliers Wood, SW19	11
Nos. 16 & 17	Wandle Bank, Colliers Wood, SW19	11
The Manor House (now forming part of the Rutlish School)	Watery Lane, Merton Park, SW19	11
Chester House	West Side Common, Wimbledon, SW19	11
Garden Building and attached Garden Wall to West of Chester House	West Side Common, Wimbledon, SW19	11
No. 4	West Side Common, Wimbledon, SW19	11
No. 6 (West Side House)	West Side Common, Wimbledon, SW19	11
Nos. 7 and 7A (Converted Stable Block adjoining North End of West Side House)	West Side Common, Wimbledon, SW19	11
Nos. 14-19 Consecutive (Hanford Row)	West Side Common, Wimbledon, SW19	11

Property	Street/ Road Name	Grade
No. 23 (Stamford House)	West Side Common, Wimbledon, SW19	11
No. 24 (The Keir)	West Side Common, Wimbledon, SW19	11
Drinking Fountain at junction with Belvedere Grove	Wimbledon Hill Road, Wimbledon, SW19	11
No. 100 (The White House)	Wimbledon Hill Road, Wimbledon, SW19	11
Base of Windmill at Mill House	Windmill Road, Mitcham, CR4	11
No. 2 (Heathfield House)	Windmill Road, Wimbledon, SW19	11
The Old Windmill	Windmill Road, SW19	11*
Drinking fountain and horse trough	Windmill Road, SW19	11
Wall to rear of Block of Flats, West of Easternmost Block (Partly numbered 9, 11, 15,17) (Medieval)	Windsor Avenue, SW19	11
Wall to rear of Block of the Westernmost Block of Flats (partly numbered 27, 29, 31, 33) (Medieval)	Windsor Avenue, SW19	11
Southside House	Woodhayes Road, Wimbledon, SW19	11*

Property	Street/ Road Name	Grade
Coach House to North of Southside House	Woodhayes Road, Wimbledon, SW19	11
No.6 (Gothic Lodge)	Woodhayes Road, Wimbledon, SW19	11
Methodist Church	Worple Road, SW19	11

Archaeological priority zones and ancient monuments

Archaeological Priority Zone and Scheduled Ancient Monuments have been defined by the Historic England, Greater London Archaeological Advisory Service. Merton has 20 areas designated as Archaeology Priority Zones (APZs) arranged under a number of archaeological themes. Full details of the council's supplementary guidance note on Archaeology can be viewed via: <https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/archaeology/archaeological-priority-zones>

Archaeological Priority Zones (APZs)

- Wandle Valley Alluvium
- Beverly Brook Valley Alluvium
- Wimbledon Common
- Mitcham Common
- Morden Park
- Merton Village
- Wimbledon Village
- Mitcham Village
- Morden Village
- Cannon Hill
- Lower Morden
- West Barnes Farm
- Stane Street
- Wandle/ Copper Mill Lane
- Wandle/ Colliers Wood
- Wandle/ Mitcham
- Mill Corner
- Merton Place
- Wimbledon Park House
- Morden Hall and Park

Scheduled Ancient Monuments

- Caesar's Camp, Wimbledon Common
- Merton Priory
- Morden Park Mound

Flooding: Sequential Test and Impact Assessment

The aim of the sequential test is to steer new development to areas with the lowest risk of flooding.

Applying the Sequential Test to individual planning applications in accordance with the National Planning Policy Framework (NPPF). Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the factors detailed in Impact Assessment set out below, it will be refused.

This appendix sets out a summary of what is required for sequential tests and impact assessments. Applicants should ensure that they meet the requirements of the NPPF, national Planning Policy Guidance, Merton's Strategic Flood Risk Assessment (SFRA) and other supporting documents such as the Council's [Sustainable Drainage SPD and Basement SPD](#).

Sequential Test

The following should be included in submitted sequential tests.

- a. Ensure that sites are assessed for their availability¹, suitability² and viability³
- b. Ensure that all in-centre options have been thoroughly assessed before less central sites are considered
- c. Ensure that where it has been demonstrated that there are no town centre sites to accommodate a proposed development, preference is given to edge-of-centre locations which are well connected to the centre by means of easy pedestrian access
- d. Ensure that in considering sites in or on the edge of existing centres, developers and operators have demonstrated flexibility in terms of:
 - I. scale: reducing the floorspace of their development.
 - II. format: more innovative site layouts and store configurations such as multi-storey developments with smaller footprints.
 - III. car parking provisions: reduced or reconfigured car parking areas; and,
 - IV. the scope for disaggregating specific parts of a retail or leisure development, including those which are part of a group of retail or leisure units, onto separate, sequentially preferable sites. We will not seek arbitrary sub-division of proposals.

In considering whether flexibility has been demonstrated, the council will take into account any genuine difficulties which the applicant can demonstrate are likely to occur in operating the proposed business model from a sequentially preferable site, for example where a retailer would be limited to selling a significantly reduced range of products. However, evidence which claims that the class of goods proposed to be sold cannot be sold from the town centre will not be accepted.

Flood Risk Assessments

You need to do a flood risk assessment for most developments within one of the flood zones. This includes developments:

- In flood zone 2 or 3 including minor development and change of use;
- More than 1 hectare (ha) in flood zone 1;
- Less than 1 ha in flood zone 1, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where they could be affected by sources of flooding other than rivers and the sea (for example surface water drains, reservoirs);
- In an area within flood zone 1 which has critical drainage problems as notified by the Environment Agency

Flood Risk Vulnerability and Flood Zone ‘Compatibility’

This table does not show:

- The application of the [Sequential Test](#) which should be applied first to guide development to Flood Zone 1, then Zone 2, and then Zone 3; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;
- The Sequential and [Exception Tests](#) do not need to be applied to [minor developments](#) and changes of use, except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site.

Where a development contains different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

Flood Risk Vulnerability classification		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone	Zone 1	√	√	√	√	√
	Zone 2	√	√	Exception Test required	√	√
	Zone 3a [±]	Exception Test required	√	X	Exception Test required	√
	Zone 3b ^π 'Functional Flood Plain'	Exception Test required	√	X	X	X
Key: √ Development is appropriate X Development should not be permitted						

± In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

π In Flood Zone 3b (functional floodplain) essential infrastructure that has to be there and has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- Remain operational and safe for users in times of flood.
- Result in no net loss of floodplain storage.
- Not impede water flows and not increase flood risk elsewhere.

Note: The Flood Zones shown on the Environment Agency's Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to Merton's Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

Flood Risk Vulnerability Classification

<p>Essential Infrastructure</p>	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which, has to cross the area at risk. • Essentially utility infrastructure which must be, located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood. • Wind turbines.
<p>Highly Vulnerable</p>	<ul style="list-style-type: none"> • Police stations, Ambulance stations and Fire stations and Command Centres, and telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use⁴. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure')
<p>More Vulnerable</p>	<ul style="list-style-type: none"> • Hospitals • Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs, and hotels. • Non-residential uses for health services, nurseries and educational establishments. • Landfill and sites used for waste management facilities for hazardous waste. • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuations plan.

⁴ For any proposal involving a change of use of land to a caravan, camping or chalet site, or to a mobile home site or park home site, the Sequential Exception Test should be applied.

<p>Less Vulnerable</p>	<ul style="list-style-type: none"> • Police, ambulance and fire stations which are not required to be operational during flooding. • Buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distributions; non-residential institutions not included in 'more vulnerable'; and assembly and leisure. • Land and buildings used for agriculture and forestry. • Waste treatment (except landfill ⁵and hazardous waste facilities). • Minerals working and processing (except for sand and gravel working). • Water treatment works which do not need to remain operational during times of flood. • Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).
<p>Water-compatible Development</p>	<ul style="list-style-type: none"> • Flood control infrastructure. • Water transmission infrastructure and pumping stations. • Sewage transmission infrastructure and pumping stations. • Sand and gravel workings. • Docks, marinas and wharves. • Navigation facilities. • MOD defence installations. • Ship buildings, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. • Water-based recreation (excluding sleeping accommodation). • Lifeguard and coastguard stations. • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms. • Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

⁵ Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#).

Employment opportunities for Merton

Policy EC.4 “local employment opportunities” sets out the council’s policy to boost job opportunities from major development, commensurate to its scale.

The table below sets out how different scales of development will contribute towards jobs opportunities and business growth in Merton, in line with the council’s planning policy.

Guidance on Employment Opportunities in Merton

	Scale of Development	Requirements
1.	From 10 homes/ 1,000 sq.m of commercial floorspace up to 20 homes/ 2,000 sq.m of commercial floorspace	Applicants are encouraged to advertise employment and business procurement opportunities (including jobs, work experience and apprenticeships for residents): In local newspapers (which are regularly delivered to homes in Merton), in Merton’s job centre plus centres and on local job recruitment sites.
2.	From over 20 homes/ 2,000 sq.m of commercial floorspace up to 50 homes/ 5,000 sq.m of commercial floorspace.	Applicants are encouraged to provide an overall employment contribution of circa 15% of potential jobs created by the proposal towards increasing employment opportunities in Merton through; the supply chain, by creating apprenticeships or by creating jobs in the resultant end use.
3.	From over 50 homes/ 5,000 sq.m of commercial floorspace up to 100 homes/ 10,000 sq.m of commercial floorspace.	Applicants are encouraged to provide an overall employment contribution of circa 20% of potential jobs created by the proposal towards increasing employment opportunities in Merton through; the supply chain, by creating apprenticeships or by creating jobs in the resultant end use.
4.	From over 100 homes/ 10,000 sq.m of commercial floorspace	Applicants are encouraged to submit an Employment Strategy with any planning application to demonstrate that proposals support local employment, skills development and training opportunities.

Marketing and Vacancy Criteria

The following details will be used to assess information submitted with planning applications, where marketing and vacancy evidence is required to be submitted. Applicants should make reference to this criteria before submitting an application.

- The minimum period of vacancy/marketing is identified within the relevant Local Plan policies. The council must be satisfied that an active marketing campaign has taken place for all relevant floorspace on a site, for a continuous period, while the premises were vacant.
- A marketing report will be required to be submitted to the council for assessment as part of the planning application. The report should include the following information to demonstrate that a thorough marketing campaign was carried out:
 - Evidence that the property was registered with at least one reputable local or national commercial property agent. This could include information showing correspondence from the property agent confirming that the marketing has commenced.
 - Evidence, through photos that an advertising board was placed on site, in a clearly visible location for the duration of the marketing period.
 - Evidence of the property details published through both online and traditional methods, and made available on request, for the duration of the marketing period. The marketing information should include the location and description of the site, size of the property, lawful land use, property type, specification, costs, rent and service charges. This information should clearly show that the property was marketed for the appropriate use, in reference to the relevant Local Plan policy.
 - Evidence showing that the marketing was continuous, from the point when the advertisement board was erected or the online ad was posted (not from the point at which the property agent was appointed). The length of the vacancy period must be clearly evidenced e.g. through the submission of correspondence from the property agent.
- Evidence that the property was marketed at a reasonable price that genuinely reflects the market value. This should consider the appropriate use or uses, condition, quality and location of floorspace, including independent professional valuation from at least three agents to confirm the price is reasonable. If a property is in a poor condition, the marketing should include options both with and without refurbishment, and clearly reflect comparable site values.

- Information on enquiries and offers received in response to the marketing. This should include the number of enquiries received, who each enquiry was from (name and type of business), the type of space or use they were interested in, confirmation on whether they viewed the property, confirmation on whether they made an offer, and a reason/s why the enquiry was unsuccessful and why any offers made were declined.
- Evidence that all opportunities to re-let the site have been fully explored.

Glossary

The glossary below should be used as a guide only and should not be considered the source of statutory definitions.

Accessibility

The general term for how easy it is for people to get to places, jobs, homes and services.

Affordable housing

Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

- *Social rented housing*: is owned by local authorities and private registered providers, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Community Agency.
- *Affordable rented housing* is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a centre of no more than 80% of the local market rent (including service charges, where applicable).
- *Intermediate housing* is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.

Archaeological Priority Zone

An area which is known to be of archaeological importance due to historic findings, excavations or historical evidence.

Article 4 Direction

A direction which withdraws automatic planning permission granted under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

Biodiversity

This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Blue Infrastructure

Blue infrastructure refers to urban infrastructure relating to water. Blue infrastructure is commonly associated with green infrastructure in the urban setting and may be referred to as blue-green infrastructure when in combination.

Building Research Establishment Environmental Assessment Methodology (BREEAM)

An international scheme that provides independent third party certification of the assessment of the sustainability performance of individual buildings, communities and infrastructure projects.

Brownfield land

Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed-surface infrastructure. The definition covers the curtilage of the development.

Business Improvement Districts (BIDs)

A Business Improvement District (BID) is a defined area within which businesses are required to pay an additional tax (or levy) in order to fund projects within the BID's boundaries.

Capital Asset Value for Amenity Trees (CAVAT)

CAVAT provides a methodology for calculating the monetary value and/or compensation where a tree is felled or damaged. It works by calculating a unit value for each square centimetre of tree stem, by extrapolation from the average cost of a range of newly planted trees. This basic value is adjusted to reflect the degree of benefit that the tree provides to the local population. The adjustment is designed to allow the final value to reflect realistically the contribution of the tree to public welfare through tangible and intangible benefits. For further information see the London Tree Officers Association website at www.ltoa.org.uk/resources/cavat

Carbon dioxide/ carbon

Carbon is often used to refer to all greenhouse gases which cause global warming, for which carbon dioxide is the most significant.

Car Clubs

A car club provides its members with quick and easy access to cars for hire. Members can make use of car club vehicles as and when they need them.

Centre Hierarchy

The hierarchy of centres in the borough categorises centres and parades into 4 types: Main centres, Local Centres, Neighbourhood Centres and Parades of local importance. They range significantly in size and function. The NPPF requires local planning authorities to define such a hierarchy.

Circular Economy

An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

Climate Emergency Declaration (or declaring a climate emergency)

By declaring a Climate Emergency the Council acknowledges that there is a need to act on the causes and impacts of climate change. As part of Merton's Climate Emergency Declaration, the Council committed towards achieving net-zero carbon emissions for the borough by 2050, and for the Council by 2030.

Combined Heat and Power (also see Decentralised Energy)

The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Communal heating systems

A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, as a tool for local authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. It allows local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Community Needs Statement

A document that assesses the proposed loss, reduction or relocation of social and community infrastructure uses.

Community Plan

The Community Plan is the [Merton Partnership](https://www.merton.gov.uk/communities-and-neighbourhoods/community-plan) overall vision for the borough and describes how the Council and its partners will work together with the local community to inform everything they do and put people first. Further information can be found on the Council's website at <https://www.merton.gov.uk/communities-and-neighbourhoods/community-plan>

Comparison Retailing

Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

Conservation (Heritage)

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area

An area declared by a local planning authority in accordance with the Town and Country Planning Act 1990 (as amended), as being of special architectural, historical or landscape interest, the character or appearance of which it is desirable to preserve or enhance.

Construction and Demolition Waste

This is waste arising from the construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

Convenience Retailing

Convenience retailing is the provision of everyday essential items, including foods, drinks, newspapers/magazines and confectionary.

Decentralised Energy Networks

Decentralised energy generation can be described as the generation of energy in the form of heat and electrical power at or near the point of use, delivered to users via distribution pipes. This contrasts with the traditional (and more inefficient) centralised concept, where energy is transported, in some cases, many hundreds of miles from a centralised power station to the point of energy use. Schemes can vary in size from a few dwellings to wider networks.

Density

Is expressed both in terms of dwellings and, to take better account of the needs of different types of household, habitable rooms per hectare.

Designated Heritage Asset

A World Heritage Site, Scheduled Monument, listed building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Developer Contributions

(see Planning Obligations or Community Infrastructure Levy)

Development

This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to, redevelopment including refurbishment as well as, new development and changes of use. The full definition is set out in Section 55 of the Town and Country Planning Act 1990.

Development Brief

A brief that sets out the vision and parameters for a development site. Apart from its aspirational qualities, a brief includes site constraints and opportunities, infrastructure requirements such as energy and transport, access and planning policies. It also sets out the proposed uses and key design principles and requirements.

Digital Infrastructure

Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

District Centre

District centres comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. In Merton, the District Centres are Colliers Wood, Mitcham and Morden.

District Heating Network

A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Dual aspect dwelling

A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.

Edge-of-centre

For retail purposes, a location that is well connected and up to 400 metres of the primary shopping area. For all other main town centre uses, a location within 400 metres of a town centre boundary. For office development, this includes locations outside of the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances.

Embodied Carbon

The carbon emissions emitted producing a building's materials, their transport and installation on site as well as their disposal at end of life.

Employment Land - *See Offices and Industrial Land*

Energy Assessment

A study which assesses the energy performance of a development against the London Plan and Local Plan energy policies which demonstrates how the development has maximised carbon savings against the Mayor's Energy Hierarchy.

Energy Efficiency

This is about making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy, in which respect it differs from the concept of energy conservation.

Energy Hierarchy

The Mayor of London's approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean), the third step is to use renewable energy (be green) and the fourth step is to monitor, verify and report on energy performance (Be Seen).

Energy Use Intensity (EUI)

An annual measure of total energy consumed in a building (kWh/m².yr) which can be estimated at design stage and monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy.

Environmental Impact Assessment (EIA)

A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment. The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

Examination

Undertaken on the 'soundness' of the Submission Local Plan, namely that it is positively prepared, justified, effective and consistent with national policy. The examination is held by an independent inspector appointed by the Secretary of State.

Extra Care

Extra Care is housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings and where they have agreements that cover the provision of care, support, domestic, social, community or other services. This helps people to live independently, avoiding the need to move into a residential care setting. Schemes vary in scale and nature so an assessment will be made on a scheme by scheme basis if a proposal is considered as 'extra care', depending on the nature of the housing and its design features, the support services available including how care is bought and provided, and any eligibility criteria for tenants or owners.

Fabric Energy Efficiency (FEE)

Measured in kWh/m².yr and available through the Government's Standard Assessment Procedure, Fabric Energy Efficiency covers space heating and space cooling energy demand.

Family housing

A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.

Floodplain

Generally low-lying areas adjacent to a watercourse, tidal lengths of the river or sea, where water flows in times of flood or would flow but for the presence of flood defences.

Flood Defence

Infrastructure used to protect an area against flooding as floodwalls and embankments. Flood Defences are designed to a specific standard of protection (design standard).

Floorspace gross

All floorspace enclosed within the building envelope.

Floorspace (net –for retail purposes)

Area of a shop that is accessible to the public: sales floor, sales counters, checkouts, lobby areas, public serving and in-store cafes. Excludes good storage, delivery, preparation area, staff offices, staff amenity facilities, plant rooms, toilets and enclosed public stairwells and lifts between floors.

Fluvial Flooding

Flooding resulting from water levels exceeding the bank level of a main river.

Fluvial water

Water in the River Thames and other rivers.

Flood Zones

Zone 1 (Low Probability) - Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)

Zone 2 (Medium Probability) - Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map).

Zone 3a (High Probability) - Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map).

Zone 3b (The Functional Floodplain) - This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. *(Not separately distinguished from Zone 3a on the Flood Map)*

Note: The Flood Zones shown on the Environment Agency's Flood Map for Planning (Rivers and Sea) do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the Merton's Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

Free Floating Car Sharing Scheme

Schemes where members can pick-up or drop-off designated vehicles in any parking space where they are entitled to park within the scheme operating boundary.

Futureproofing

Ensuring that designs are adaptable and take account of expected future changes. For example, ensuring a heating system is designed to be compatible with future net-zero carbon solutions.

Green Corridors

Relatively continuous areas of open space leading through the built environment, which may link to each other and to Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Greenhouse Gas

Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Green Infrastructure

Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

Green Space

All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.

Habitable Rooms

Includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more.

Health Inequalities

Health inequalities are defined by the UK Government as ‘inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants.’

Health Impact Assessment (HIA)

HIAs are a method of estimating the potential health effects of the implementation of a plan or programme where there are likely to be significant impacts.

Heritage Asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic Environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Those elements of the historic environment that hold significance are called heritage assets.

Inclusive Design

Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity

Industrial Land and Business Parks

Industrial land and business parks are identified in the Local Plan and refer to land used for general industry, warehouses, storage, distribution and logistics and other similar types of industrial employment that may require 24-hour operations and can't be carried out in residential area without detriment to local amenity. Some sui generis uses may be appropriate such as vehicle repair garages, scrap yards, petrol filling stations, builders' merchants.

Infrastructure

Includes transport, energy, water, waste, digital/smart, social and community, and green infrastructure.

Infrastructure Delivery Plan (IDP)

The IDP sets out the borough's infrastructure requirements over the lifetime of the Local Plan. It covers a range of social and community infrastructure, emergency services, green infrastructure, utilities and physical infrastructure and transport infrastructure.

Infrastructure Delivery Schedule (IDS)

The IDS, sets out the where, what, why, who and when key infrastructure that is required in the borough will be delivered.

International, national and locally designated sites of importance for biodiversity

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Listed (Locally) Buildings

These are buildings, structures or features which, whilst not listed by the Secretary of State, are an important part of Merton's heritage due to their architectural, historic or archaeological significance. Locally listed Buildings and structures are approved for inclusion on the list by the Council. In Merton, the criteria used to identify locally listed buildings are: Architectural style, Age and history, Detailing, Group value, building materials, subsequent alterations.

Listed (Statutorily) Buildings

These are buildings included in the list of Buildings of Special Architectural or Historic Interest which is compiled by the Secretary of State for the Environment and is a national list. Listed building consent is required for demolition and for internal as well as external alterations. There are three grades of building on the Statutory List: grade I, Grade II* and Grade II.

Local Centre

Local centres including a range of small shops and services of a local nature, serving a small catchment within easy walking distance of residential areas. In Merton, the Local Centres as defined on the Policies Map are Arthur Road, Motspur Park, North Mitcham, Raynes Park, South Wimbledon Wimbledon Village.

Local Implementation Plan (LIP) for Transport

Statutory transport plans produced by London boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

Local Nature Reserves (LNR)

This is strictly an area designated under section 21 of the National Parks and Access to the Countryside Act 1949. An LNR is one of several places in a city or town where animals can comfortably reside, and plants can grow wild. Sites are declared LNR's because they have features of special interest and are designated based on English Nature guidelines.

The London Plan

The London Plan is the spatial development strategy for the Greater London area and the Mayor of London is responsible for producing this planning strategy. The London Plan deals with matters of strategic importance to the area and forms part of the Development Plan for the borough.

Major Centre

Major Centres normally have over 50,000 square metres of retail floorspace and their retail offer is derived from a mix of both comparison and convenience shopping. Some Major Centres, which have developed sizeable catchment areas, also have some leisure and entertainment functions. Merton's only Major Centre is Wimbledon town centre.

Merton's Climate Strategy & Action Plan

Developed in response to the Council's declaration of a Climate Emergency, this 30 year plan sets out the key actions required across four thematic areas (the Green Economy, Buildings and Energy, Transport and Greening Merton) to become a net-zero carbon borough by 2050, as well as the actions required to decarbonise the Council's own operations by 2030.

Metropolitan Open Land (MOL)

Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

Mixed Use Development

Development for a variety of activities on single sites or across wider areas such as within centres.

National Planning Policy Framework (NPPF)

The NPPF sets out the Government's planning policies for England and how these are expected to be applied, alongside other national planning policies. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Nature Conservation

Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

Neighbourhood Parades

Convenience shopping and other services easily accessible to those walking or cycling or those with restricted mobility.

Neighbourhood (Development) Plan

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a designated neighbourhood area and they can allocate sites for development. These are plans are on a much smaller scale than the Local Plan and should therefore be about local rather than strategic issues. Neighbourhood planning is optional, and a Neighbourhood Plan can only be written by a designated Neighbourhood Forum for a designated Neighbourhood Area. Neighbourhood Plans, once made, form part of the borough's Development Plan.

Net-Zero Carbon

An activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere, is considered net-zero carbon. In order to achieve a net-zero carbon balance, carbon emissions must be reduced as close as possible to zero, with any remaining carbon emissions being offset by equivalent carbon sinks.

Net-Zero Carbon Buildings

Net-zero carbon policies currently consider a building's regulated emissions and are measured as an improvement against Part L Building Regulations 2013. Under the Mayor's zero carbon policy, development must maximise carbon savings on-site against the Mayor's energy hierarchy, and once this has been achieved, offset any remaining regulated emissions via cash-in-lieu contributions to the Council's Carbon Offset Fund, which is ring fenced to secure delivery of carbon dioxide savings elsewhere in the borough, or via offsite carbon offsetting projects which have been agreed with the Council.

Office

A building or premises falling within the E(g)I or E(c)i Use Class Order.

Open Space

All the land that is predominantly undeveloped, other than by buildings or structures that are ancillary to the open space use, and bodies of water that are indicated as open space on Merton's Policies Map. The definition covers a broad range of types of open space within Merton, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Opportunity Areas

London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

Out-of-centre

A location which is not in or on the edge-of -centre but not necessarily outside the urban areas.

Part L

Building regulation in England setting standards for the energy performance of new and existing buildings. Currently Part L Building Regulations 2013. The Government is in the process of consulting on changes to Part L for the Future Homes Standard.

Permitted Development Rights

Permitted Development Rights are a national grant of planning permission, which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted Development Rights are subject to conditions and limitations to control impact and to protect local amenity.

Photovoltaics (PV)

The direct conversion of solar radiation into electricity by the interaction of light with electrons in a semiconductor device or cell.

Planning Application

Administrative process where permission is sought from the local authority to carry out development. The form and content of the application is laid down in guidance. Application can be made in outline or detailed form for some categories of development.

Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990).

Planning Obligation

A legally enforceable obligation entered under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. A Planning Obligation places a charge on the land to which it relates.

Planning Permission

The consent given by the local planning authority for building operations as defined in the Town and Country Planning Act that do not constitute permitted development as defined in the general permitted development order (GDPO) or uses permitted by the use classes order; usually subject to conditions and sometimes a legal agreement.

Planning Practice Guidance (PPG)

The national Planning Practice Guidance was published by Government as a web-based resource in March 2014 (and as amended), adds further context to the NPPF. Local planning authorities should have regard to advice contained in the PPG when developing their plans. The PPG is also a 'material consideration' when taking decisions on planning applications.

Playing Field

The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

Policies Map

A supporting document illustrating the spatial policies of the adopted plans.

Previously Developed Land

Previously developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. This excludes land in built-up areas such as private residential gardens, parks, recreation grounds and allotments and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Pluvial Flooding

Flooding from water flow over the surface of the ground often occurs when the soil is saturate and natural drainage channels or artificial drainage systems have insufficient capacity to cope with additional flow.

Primary Shopping Area

Defined area where retail development is concentrated (generally comprising the core and those secondary frontages which are adjoining and closely related to the core shopping frontage).

Priority Habitat

London's priority habitats are those areas of wildlife habitat which are of most importance in London. Most areas of priority habitat are protected within Sites of importance for Nature Conservation.

Priority Species

These are species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.

Protected Species

Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Public Open Space

Parks and similar land for public use, whether provided by the Council, or privately, where access for the public is secured by virtue of legal arrangements.

Public realm

This is the space between and surrounding buildings and open spaces that are accessible to the public and include streets, pedestrianised areas, squares, river frontages etc

Public Transport Accessibility Level (PTAL)

This is a measure of accessibility to the public transport network. For any given point in London, PTALs combine walk time to the network (stations, bus stops) with service wait time at these stops to give an overall accessibility index. This can be allocated to six accessibility levels with one being poor and six being excellent.

Registered Providers

These are normally approved housing associations, who provide social housing for the Council, previously known as Registered Social Landlords. The Registered Providers share the Merton Housing Register and must be approved by the Homes and Communities Agency.

Renewable Energy

Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Residential Care

Residential care homes are residential developments where several older people live, usually in single rooms, and have access to on-site care services. A home registered simply as a care home will provide personal care only – help with washing, dressing and giving medication. Care homes with nursing provide the same personal care, but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention for a nurse. Homes registered for nursing care may accept people who just have personal care needs but who may need nursing care in the future. Residential care homes are regulated by the Care Quality Commission.

Retrofitting

The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

Re-use

The operation or process of checking, cleaning or repairing materials that have been discarded and are waste so that they can be used again for their original purpose as non-waste without any other pre-processing.

Secondary heat

To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Service retailing

Comprises of uses providing services such as hairdressing, beauty salons, dry cleaning, post office, and clothing hire, opticians and travel agents.

Sequential Test

A planning principle that seeks to identify, allocate or develop certain types or locations of land before others.

Scattered Employment Sites

An employment site that is not a designated employment site (a site that is not a Strategic Industrial Location or Locally Significant Industrial Site) as illustrated in Merton's Policies Map (as amended).

Scheduled Ancient Monument

Scheduled Ancient Monuments are identified by the Secretary of State for Culture Media and Sport under the Ancient Monuments and Archaeological Areas Act 1979. They are monuments of National importance to which statutory protection is afforded.

Site of Importance for Nature Conservation (SINC)

Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs (see below), SINCs are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINCs are set out in Appendix 5 of the Mayor's London Environment Strategy.

Site of Special Scientific Interest (SSSI)

Areas of land with ecological or geological interest of national importance. They are designated by Natural England under the Wildlife and Countryside Act (1981 as amended) and have legal protection.

Social and Community Infrastructure

Infrastructure that is available to, and serves the needs of the local community. This covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social and community infrastructure.

Standard Assessment Procedure (SAP)

The methodology used by the Government to assess and compare the energy and environmental performance of dwellings against Part L Building Regulations.

SAP Carbon Emission Factors

Factors used to calculate the emissions generated by one unit of heat (kWh) for different fuel types (gas and electricity) in the Government's Standard Assessment Procedure.

Strategic Environmental Assessment (SEA)

Required by European and UK law, SEA is a way of systematically identifying and evaluating the impacts that a plan is likely to have on the environment. The aim is to provide information in the form of an Environmental Report that can be used to enable decision makers to take account of the environment and minimise the risk of the plan causing significant environmental damage. Government guidance advises that where a plan requires both strategic environmental assessment and sustainability appraisal, that the former process should be integrated into the latter.

Strategic Flood Risk Assessment (SFRA)

A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk.

Sui Generis

Uses which do not fall within any Use Class. Such uses include betting offices / shops, theatres, larger houses in multiple occupation, scrap yards, launderettes, night clubs and pay day loan shops.

Supplementary Planning Documents (SPD)

Documents which add further detail to the policies in the Local Plan. SPDs can be used to provide further guidance for development on specific sites, or on issues, such as design. SPDs are material considerations in planning decisions but are not part of the statutory development plan. The Mayor of London produces Supplementary Planning Guidance (SPGs) to provide further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself.

Surface Water

Rainwater (including snow and other precipitation) which is on the surface of the ground and has not entered a watercourse, drainage system or public sewer.

Surface Water Attenuation

Mitigation measures for flood prevention and protection from surface water.

Sustainability Appraisal (SA)

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability Appraisal is a systematic appraisal process. The purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Sustainable Community Strategy (SCS) – *See Community Plan*

Sustainable Drainage Systems (uSUDS)

SUDS mimic nature and typically manage rainfall close to where it falls. SUDS can be designed to transport (convey) surface water, slow runoff down (attenuate) before it enters watercourses, they provide areas to store water in natural contours and can be used to allow water to soak (infiltrate) into the ground or evaporated from surface water and lost or transpired from vegetation (known as evapotranspiration).

Third Generation (3G) playing pitch

A type of artificial grass pitch (AGP) known as 'third generation turf'. With 3G turf, the pile (the artificial grass 'blades') is supported by an infill of rubber crumb. Sports that can use 3G pitches include football, rugby and lacrosse, providing that certain specifications are met for each sport.

Town centre

Shopping and service area with defined boundaries on Merton's Policies Map. It includes the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres applies to major centre, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Existing out-of-centre developments, comprising or including retail and other town centre uses, do not constitute town centres.

Town centre type uses

The uses to which town centre policies apply are:

- Shops and offices
- Leisure and entertainment facilities and the more intensive sport and recreation uses (including restaurants, cafes, cinemas, bars and pubs, night clubs, health and fitness centres, indoor bowling centres and bingo halls)
- Arts, culture and tourism development (including theatres, museums, galleries, concert halls, hotels and conference facilities)

Transport Assessment (TA)

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

Transport Statement (TS)

A simplified version of a Transport Assessment where it is agreed the transport issues arising out of development proposals are limited and a full Transport Assessment is not required.

Travel Plan

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

Tree Preservation Order

A Tree Preservation Order may be made to protect individual trees or groups of trees. The Order gives protection against unauthorised felling, lopping, or other tree works.

Urban Greening

Urban greening describes the act of adding green infrastructure elements. Due to the morphology and density of the built environment in London, green roofs, street trees, and additional vegetation are the most appropriate elements of green infrastructure in the city.

Urban Greening Factor (UGF)

A land-use planning tool to help determine the amount of greening required in new developments.

Urban Heat Island

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

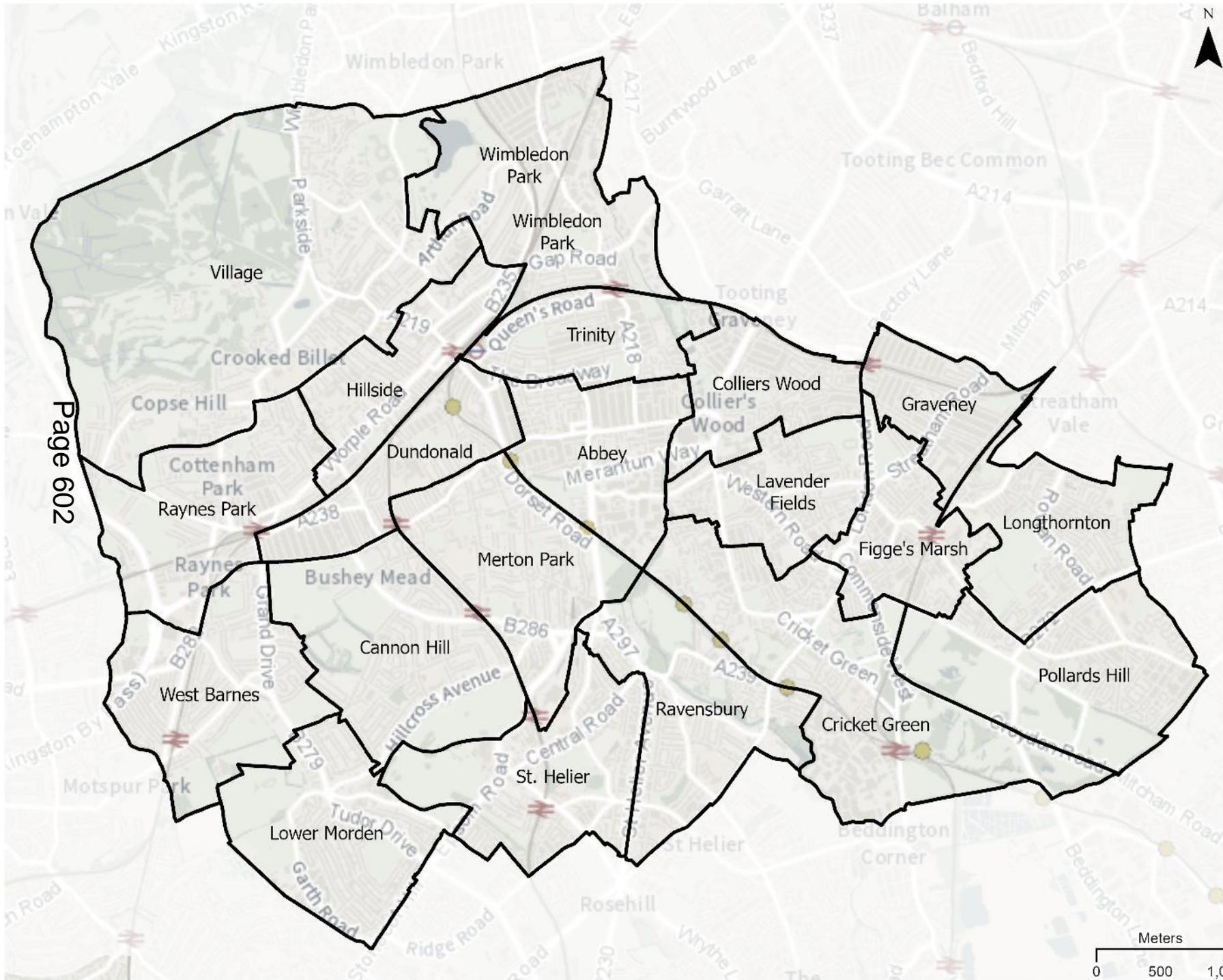
Use Class Order:

The [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#) puts uses of land and buildings into various categories known as 'Use Classes'. "change of use" can occur within the same Use Class or between one Use Class and another. Government can change the Use Class Order. The Planning Portal keeps an up to date record of Use Classes.

https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

Whole life-cycle Carbon (WLC)

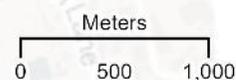
Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, operation, maintenance and eventual material disposal.

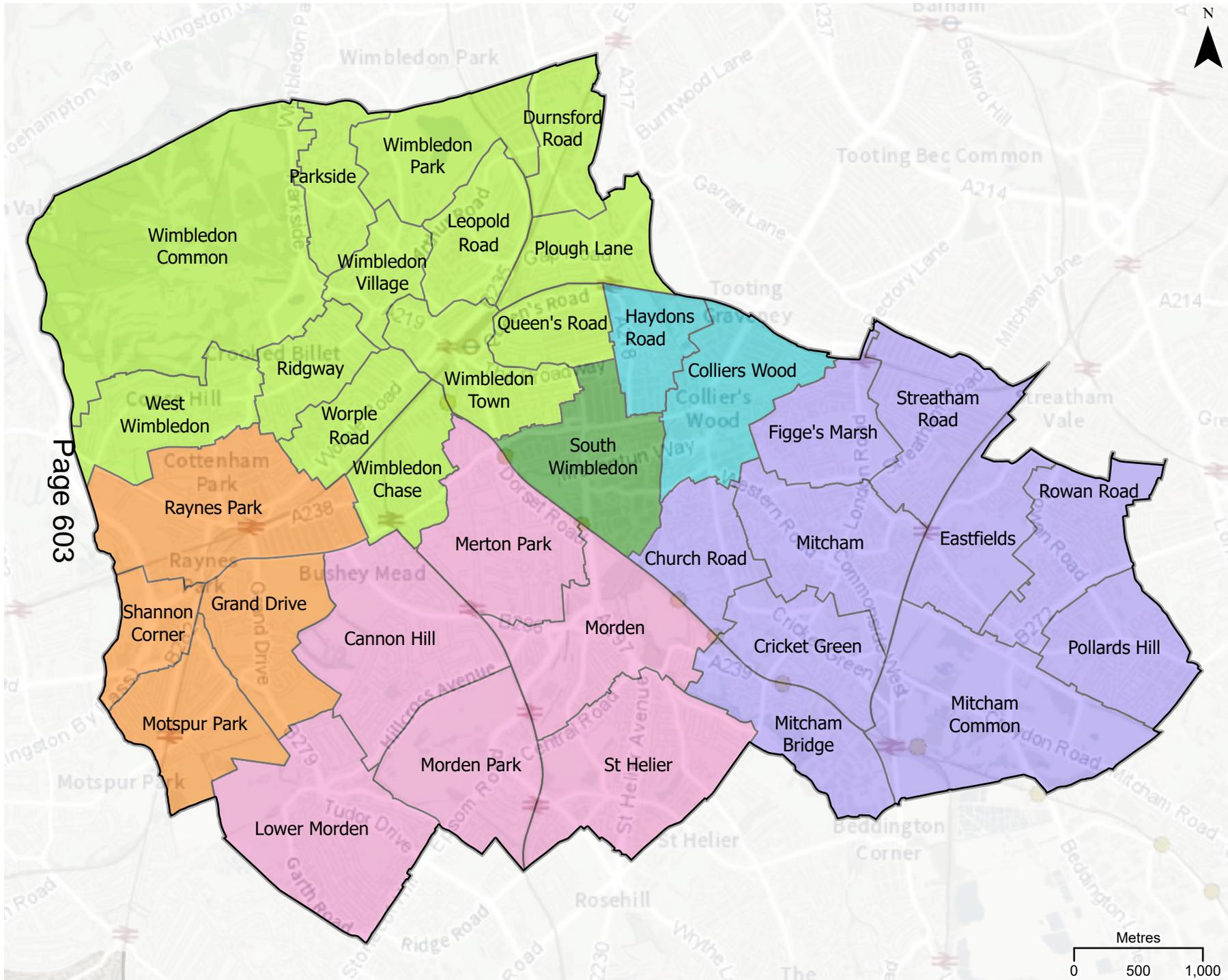


Legend
 Merton Wards



Page 602



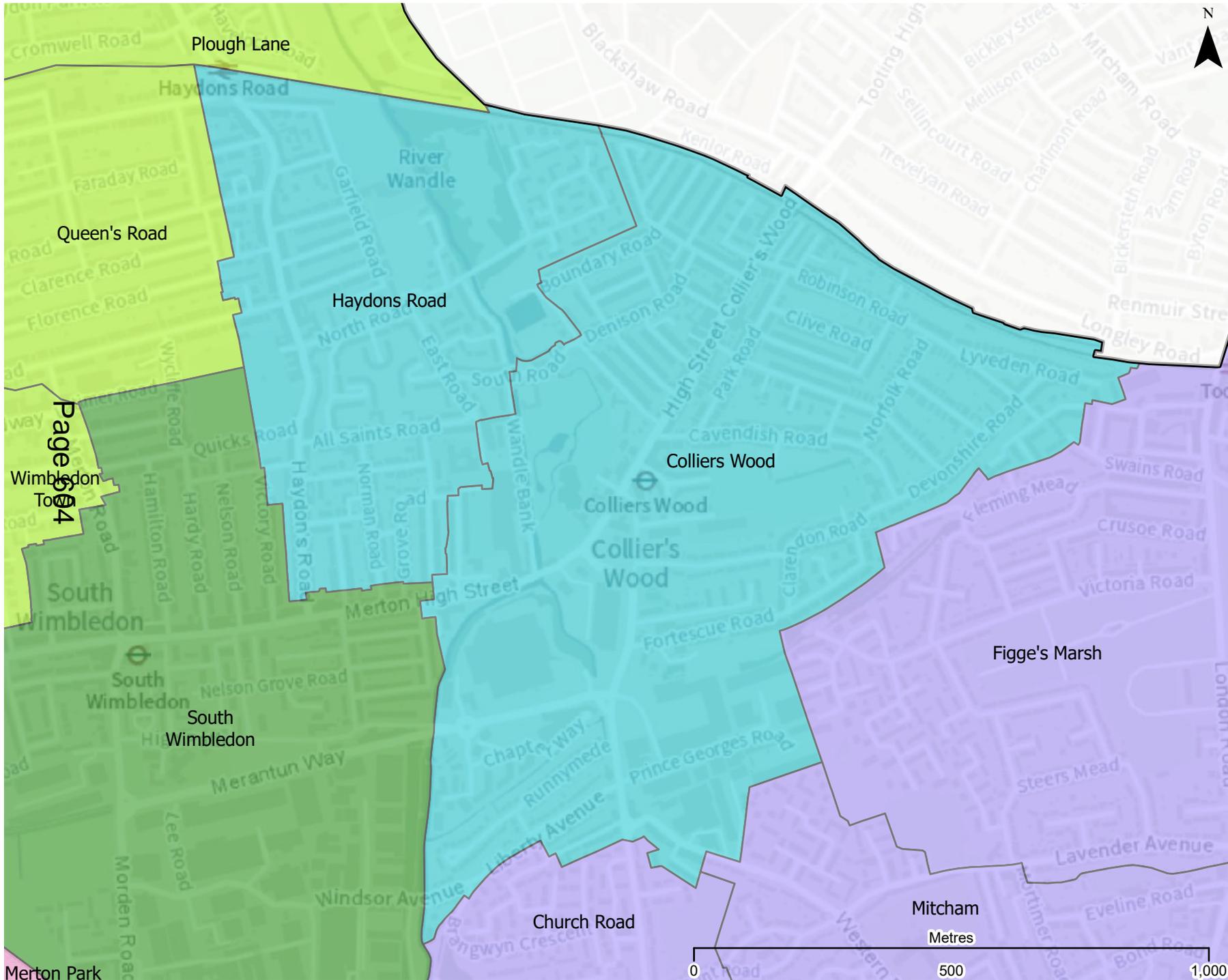


Legend

- Colliers Wood
- Mitcham
- Morden
- Raynes Park
- South Wimbledon
- Wimbledon

Page 603

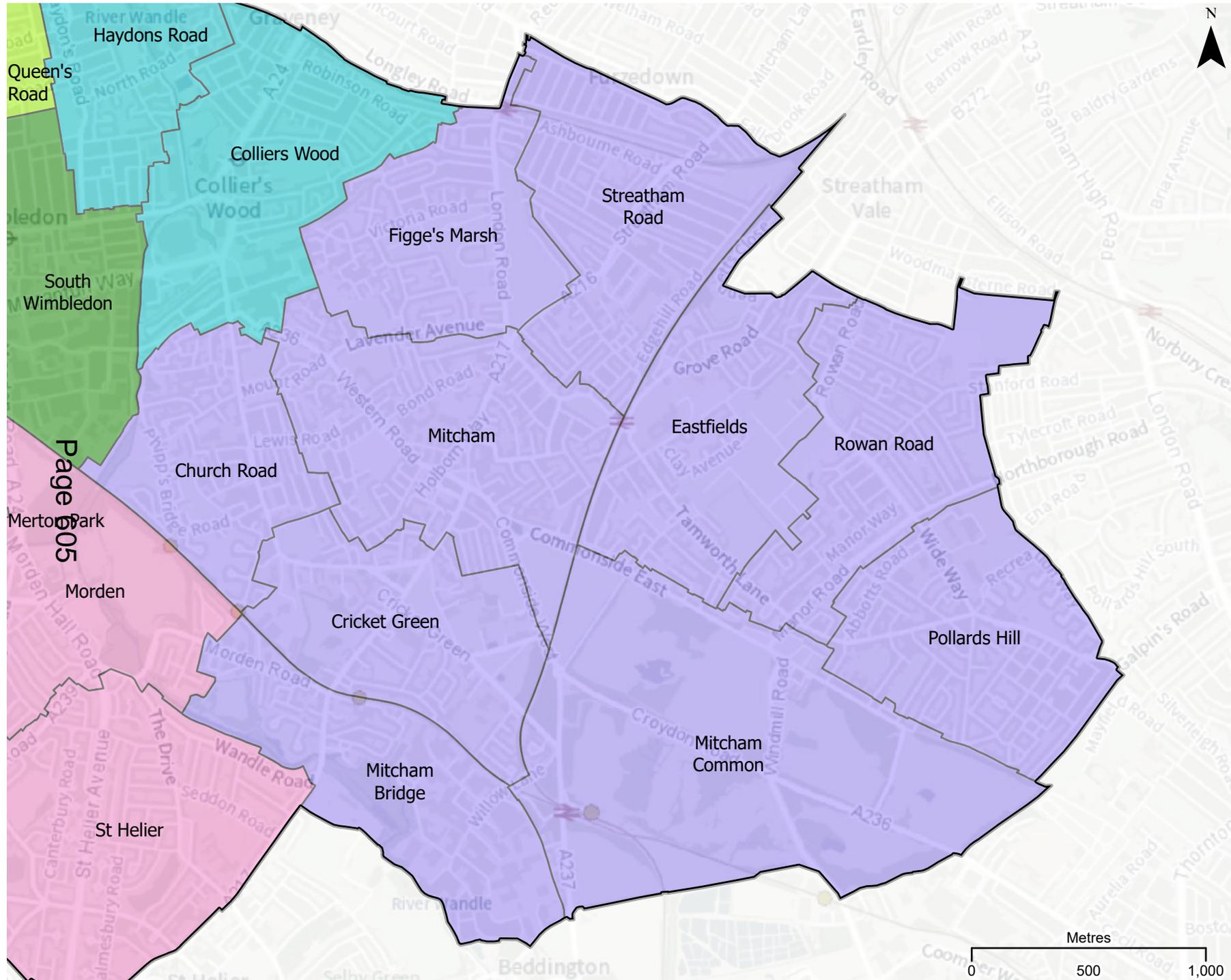




- Legend**
- Colliers Wood
 - Mitcham
 - Morden
 - South Wimbledon
 - Wimbledon

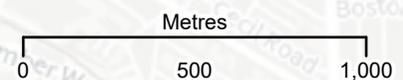
Page 04
Wimbledon
TO

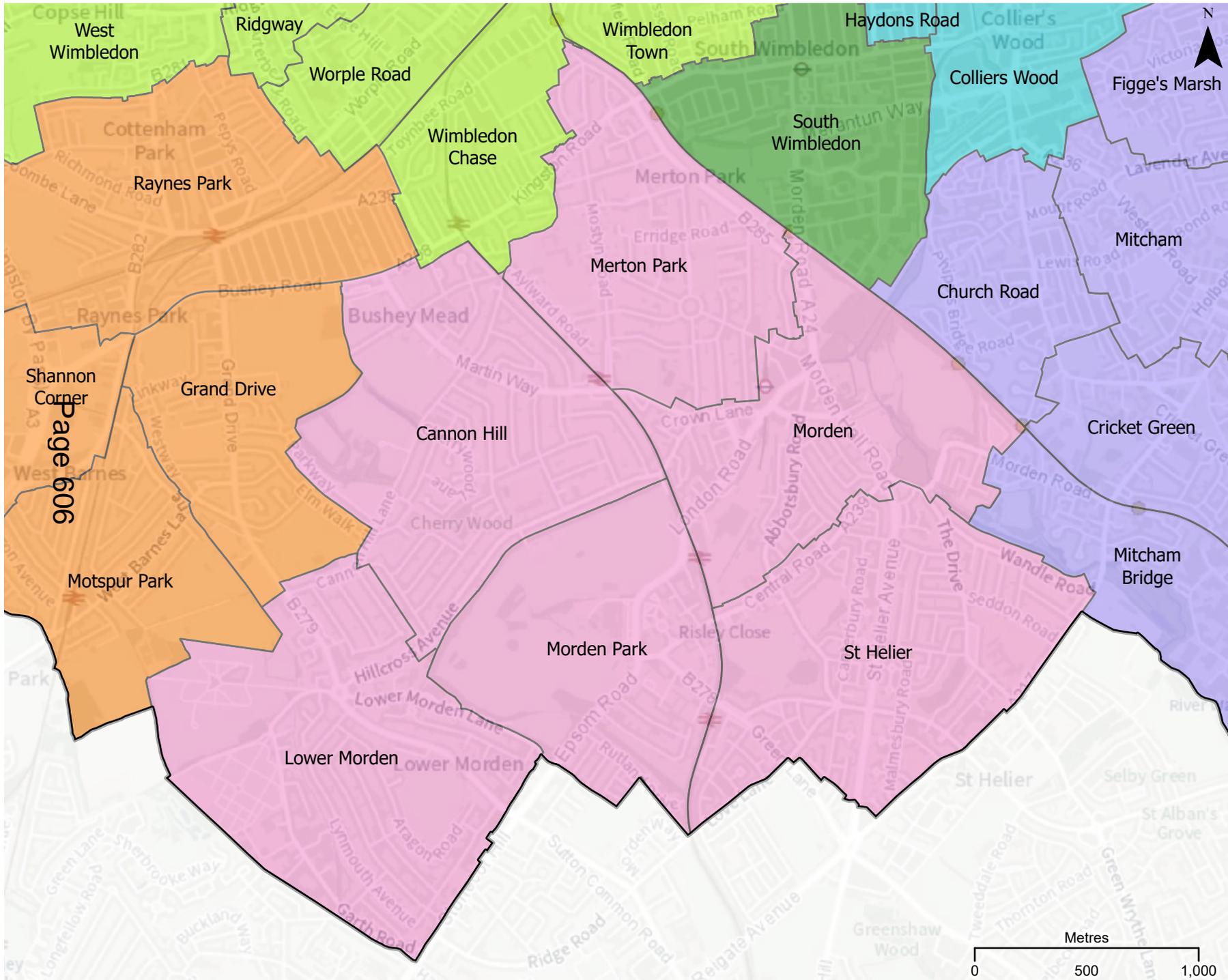




Legend

- Colliers Wood
- Mitcham
- Morden
- South Wimbledon
- Wimbledon



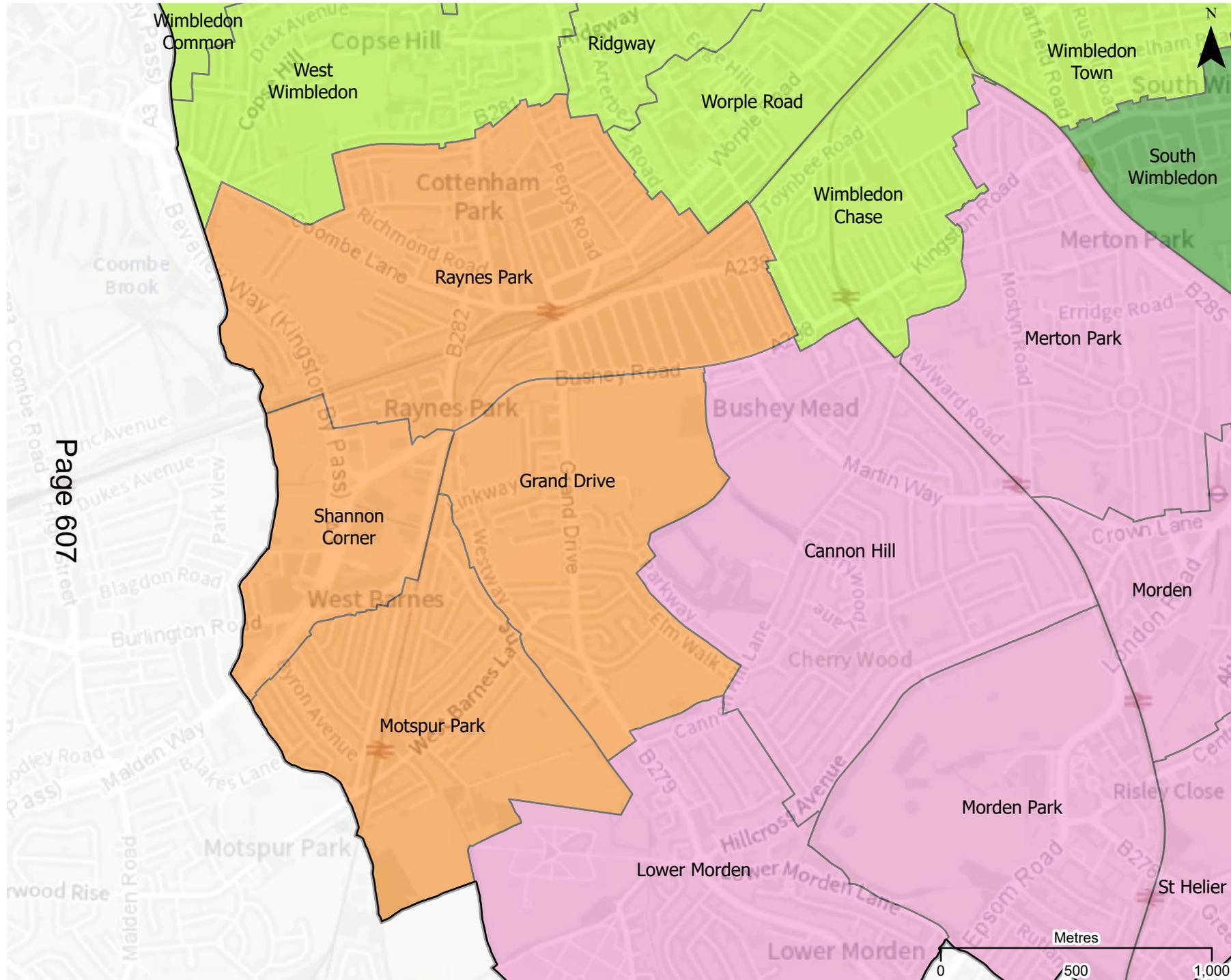


Legend

- Colliers Wood
- Mitcham
- Morden
- Raynes Park
- South Wimbledon
- Wimbledon

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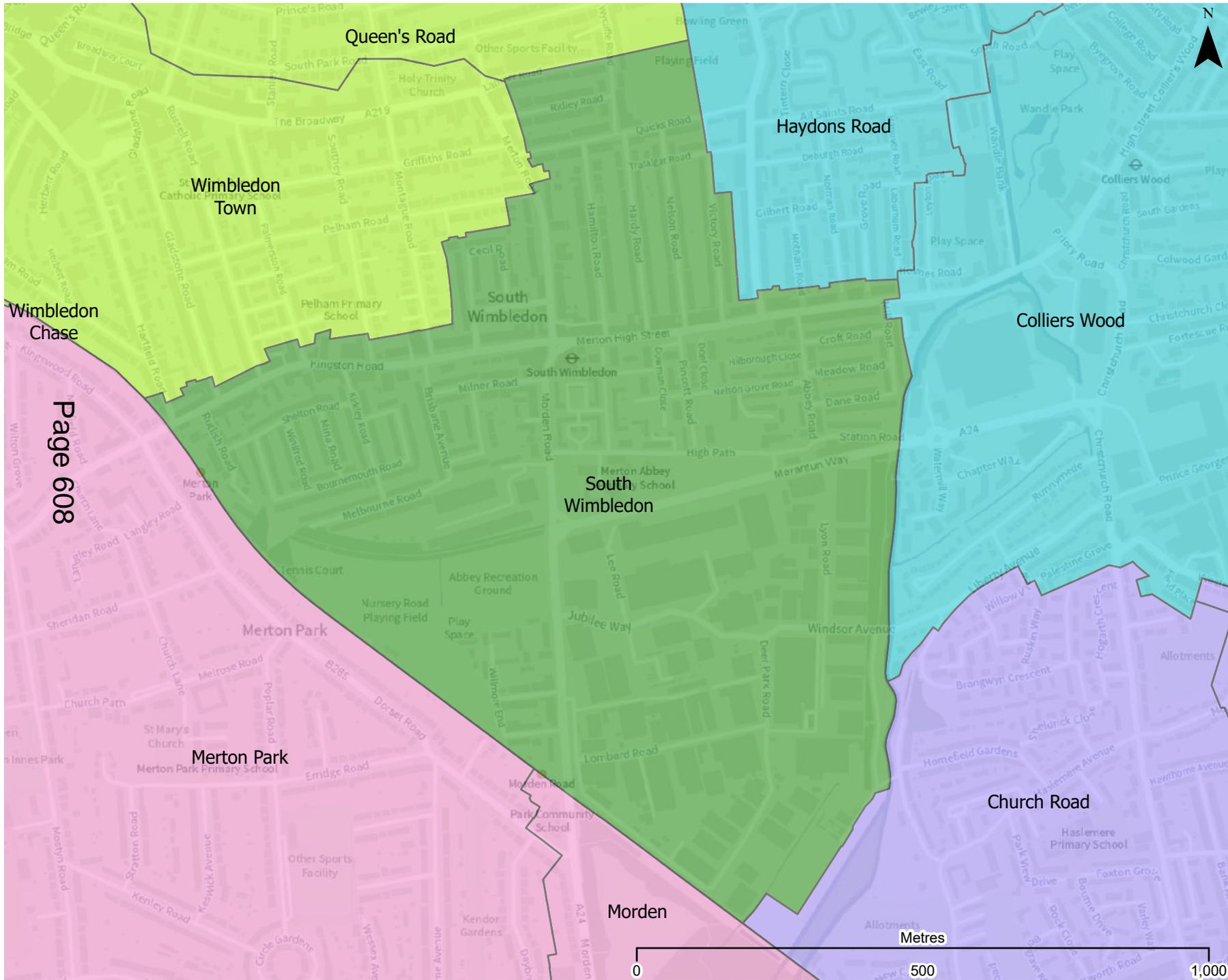




Legend

- Morden
- Raynes Park
- South Wimbledon
- Wimbledon

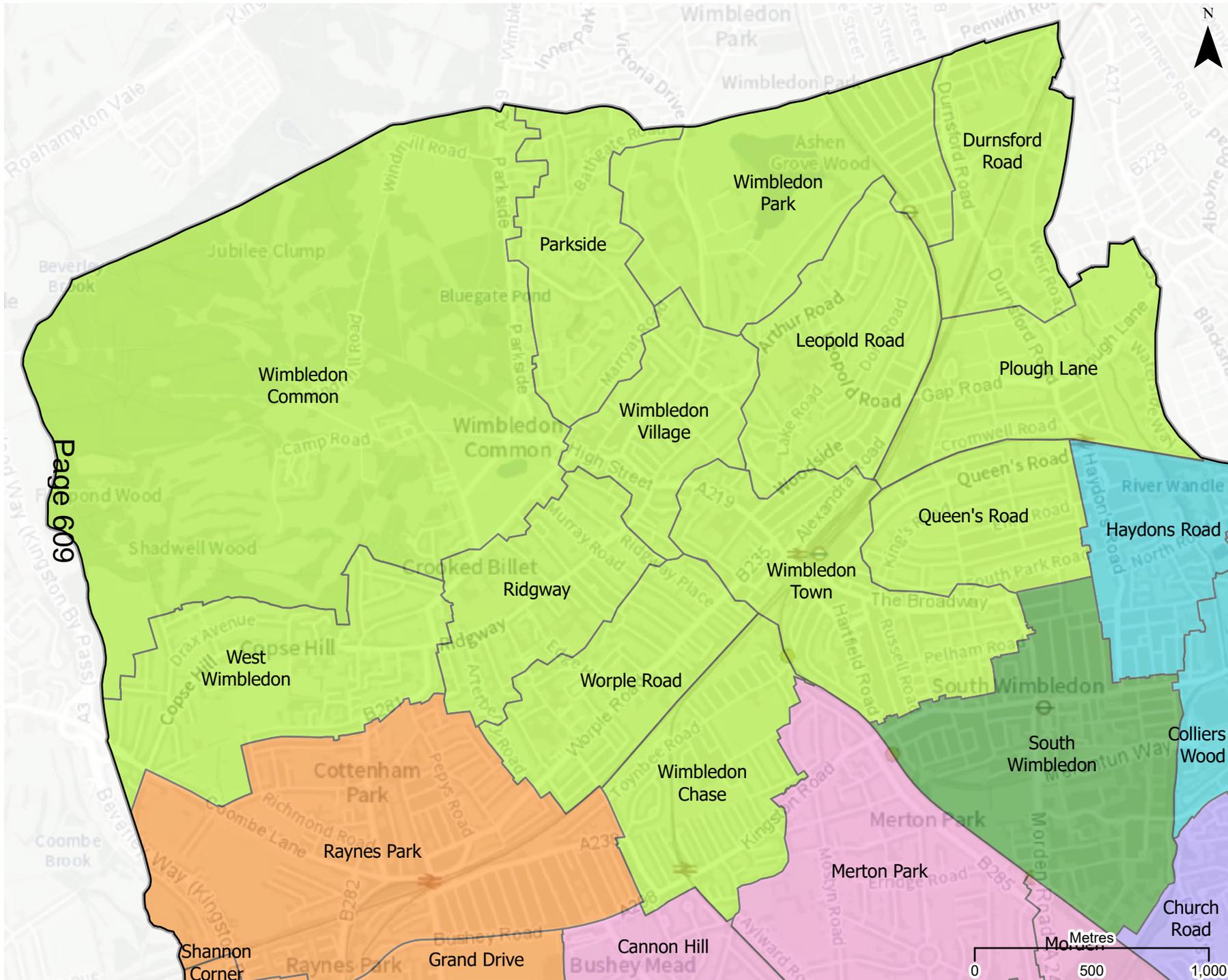




Legend

- Colliers Wood
- Mitcham
- Morden
- South Wimbledon
- Wimbledon





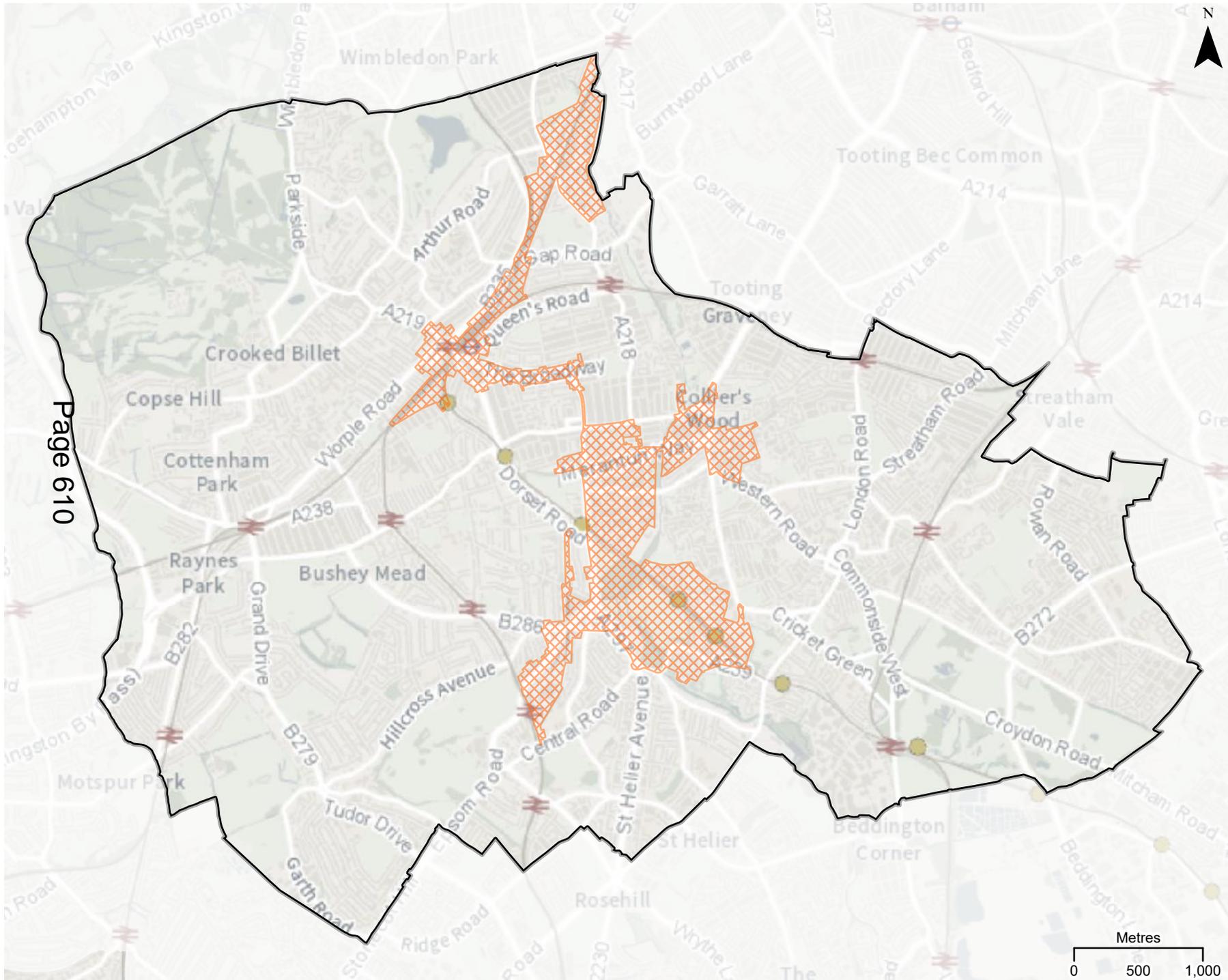
Legend

- Colliers Wood
- Mitcham
- Morden
- Raynes Park
- South Wimbledon
- Wimbledon



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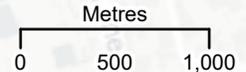


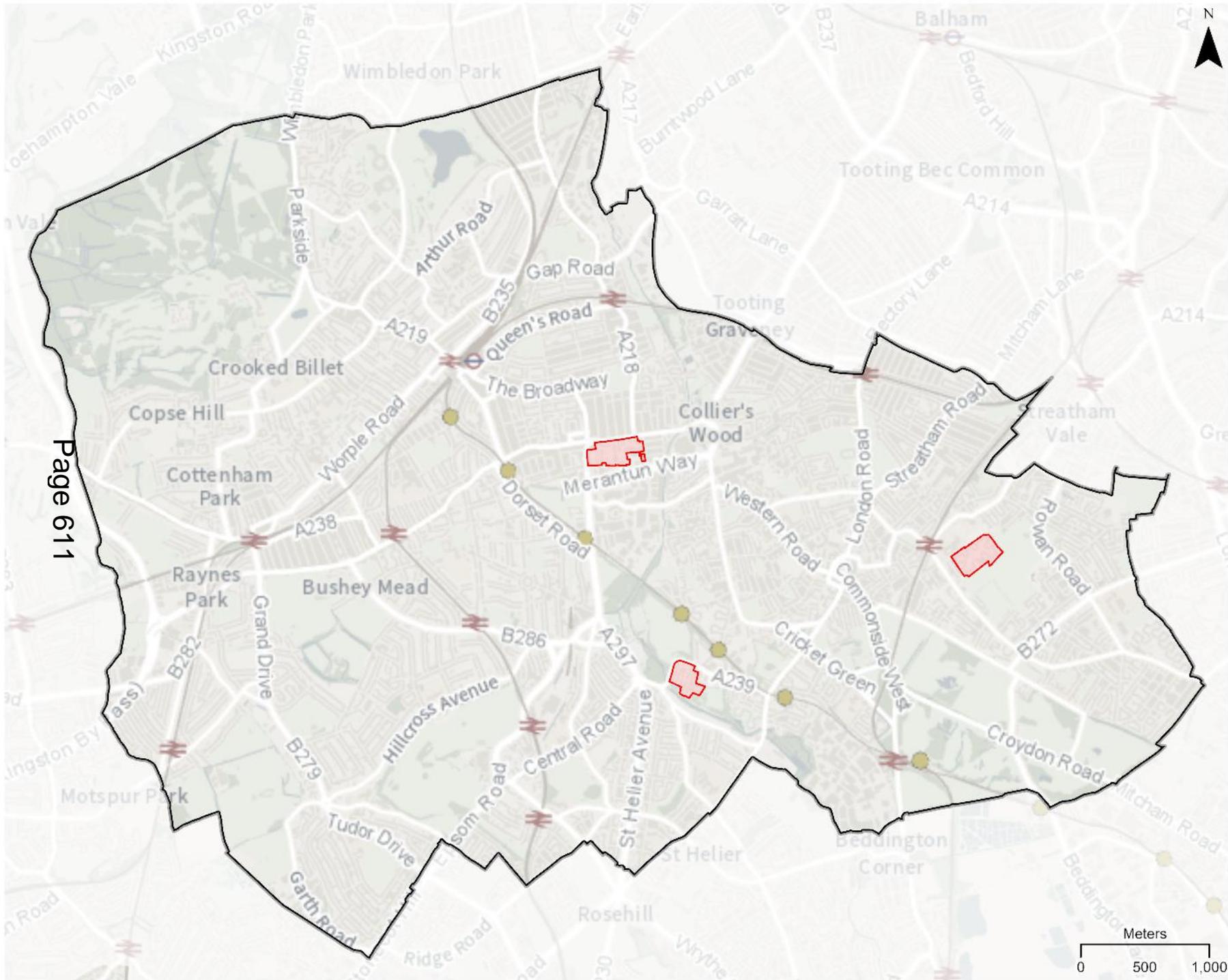
Legend

 Merton Opportunity Area



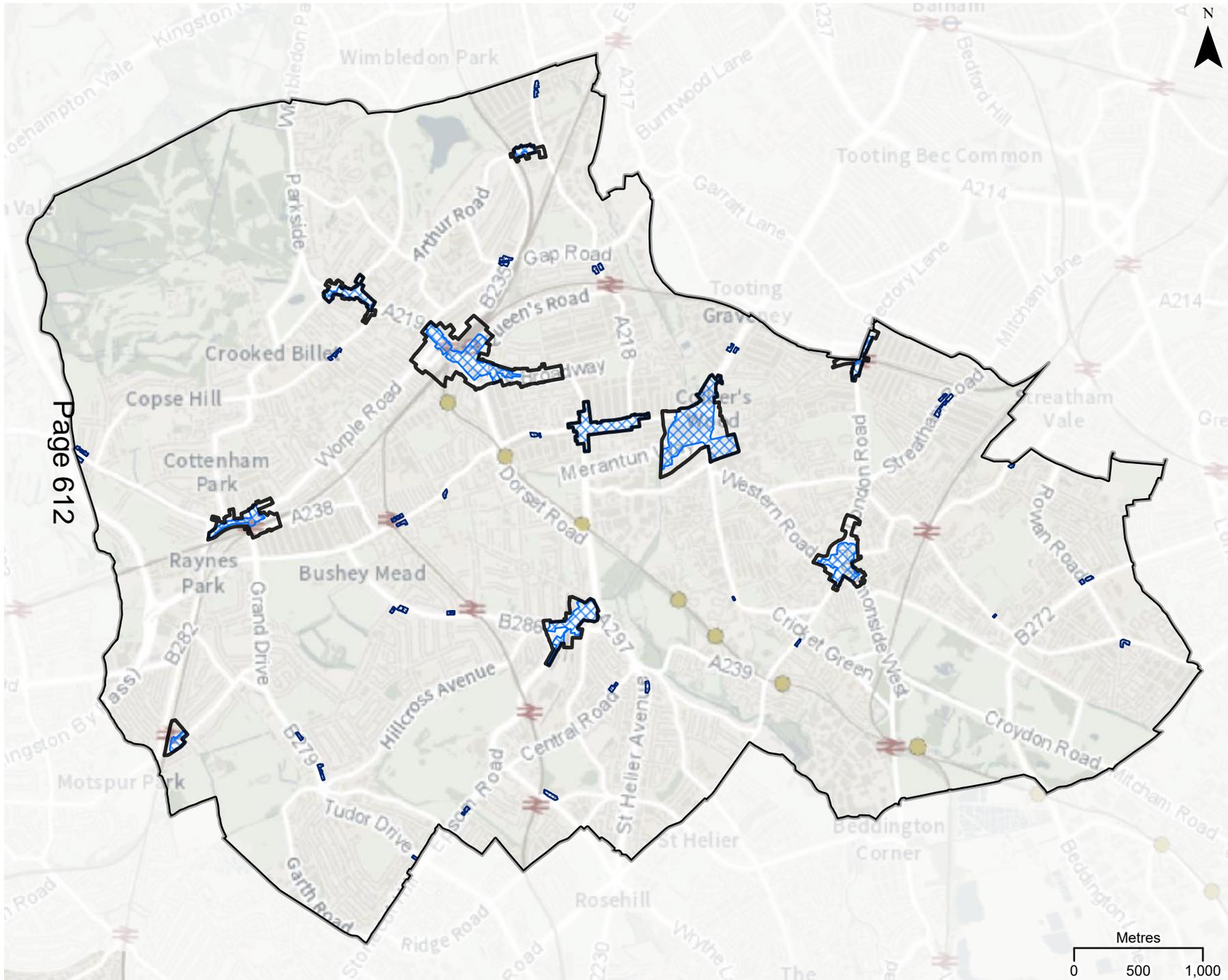
Page 610





Legend
 Estate Regeneration



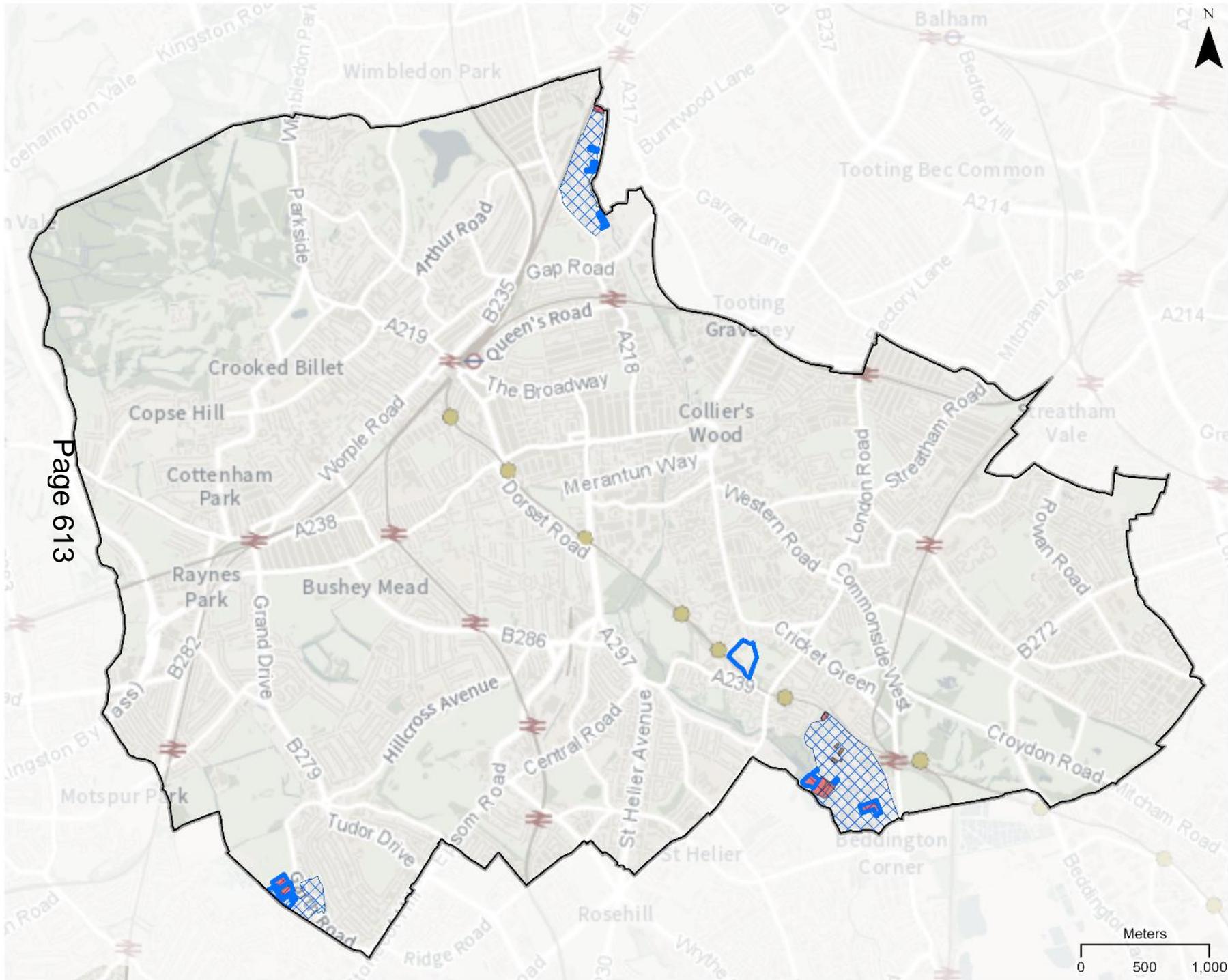


Legend

-  Town Centres
-  Primary Shopping Areas
-  Neighbourhood Parades

Page 612



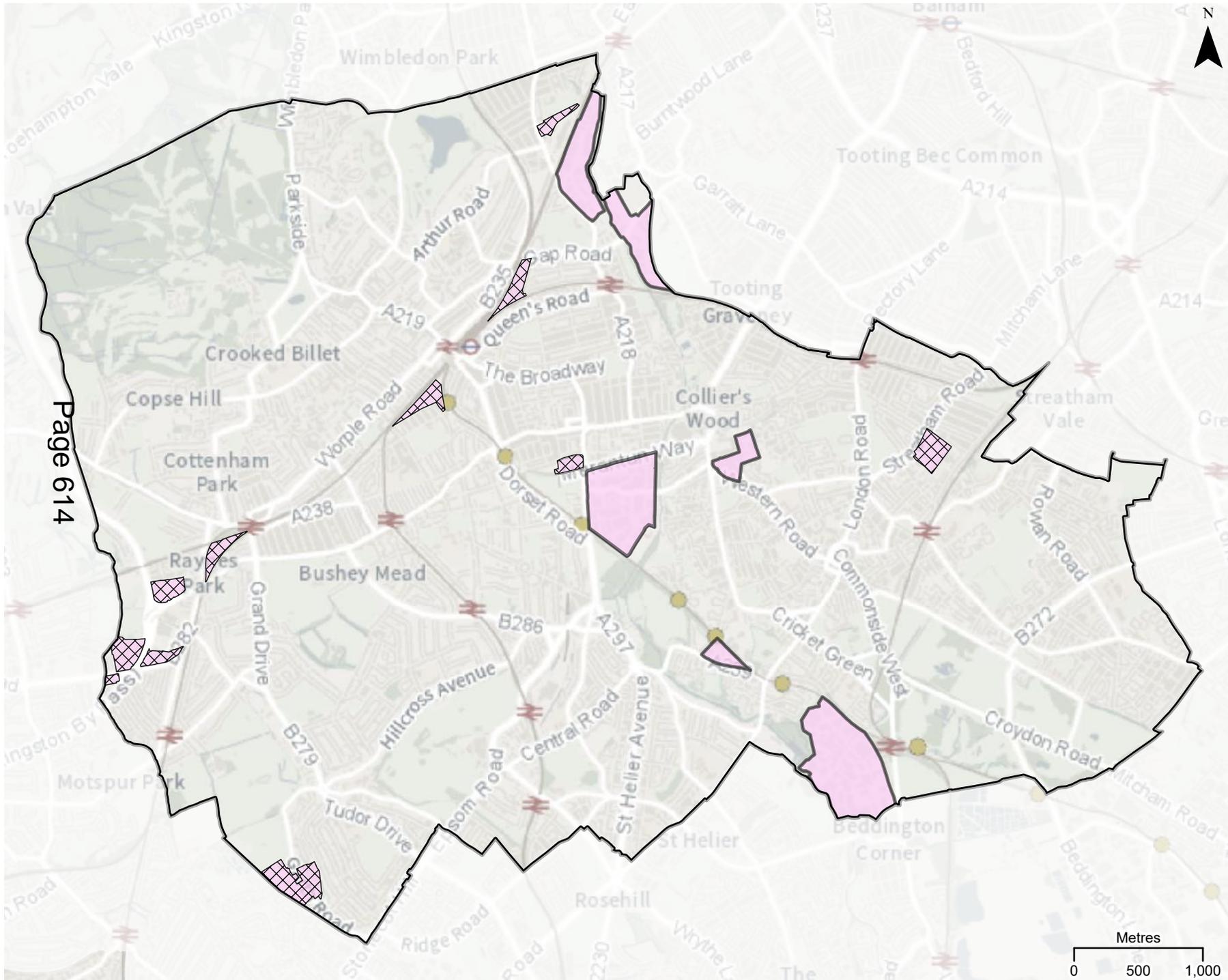


Legend

Waste

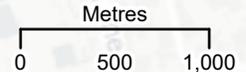
- Waste Plan Schedule 1 Areas 2014
- Draft South London Waste Plan 2021
- Waste Plan Schedule 2 Areas 2014





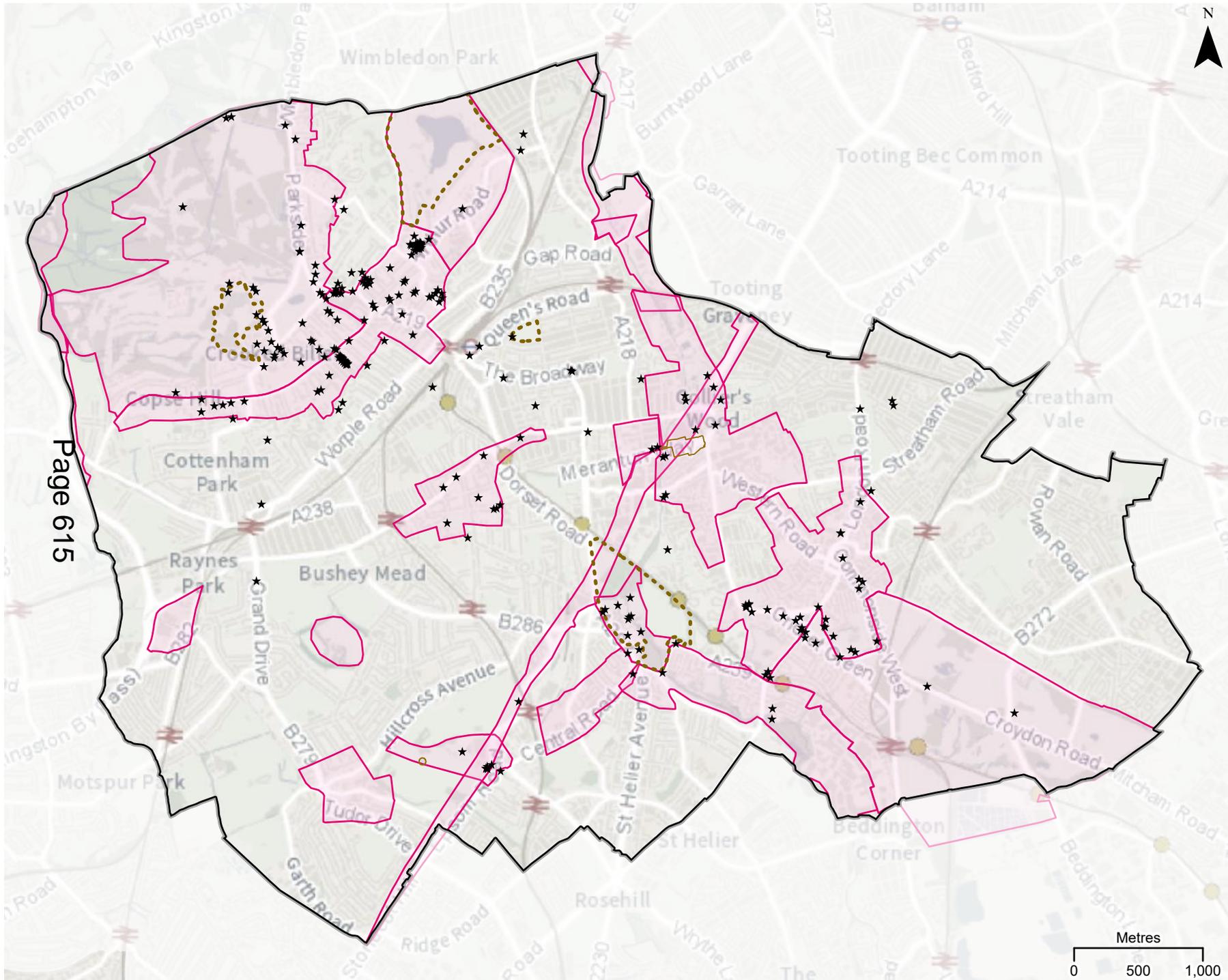
Legend

-  Strategic Industrial Locations
-  Locally Significant Industrial Sites
-  Industrial Area Policies



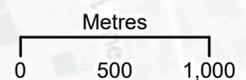
Page 614

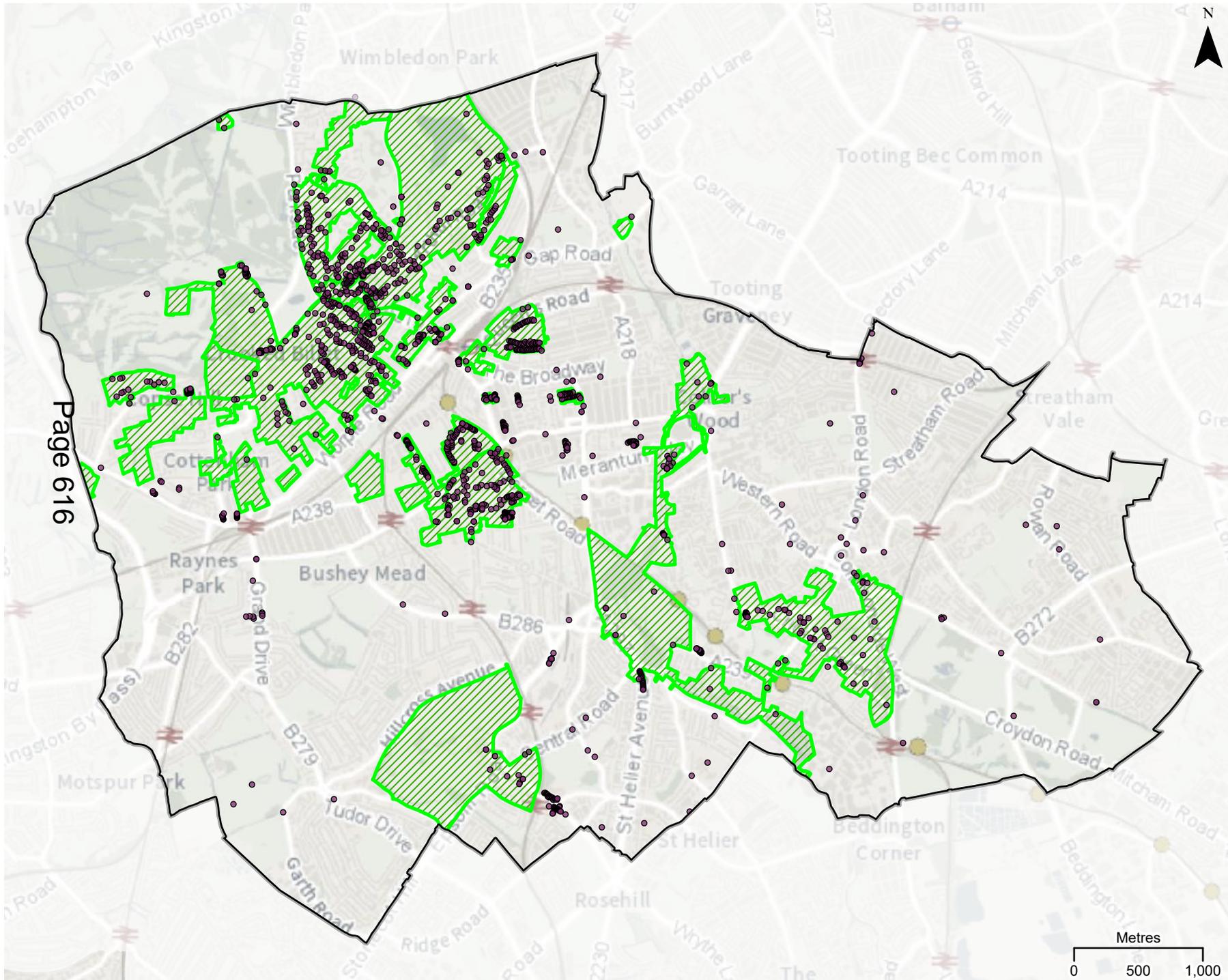




- Legend**
- ★ Listed Buildings
 - ▭ Scheduled Ancient Monuments
 - ⋯ Historic Parks and Gardens
 - ▭ Archaeological Priority Zones

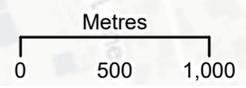
Page 615

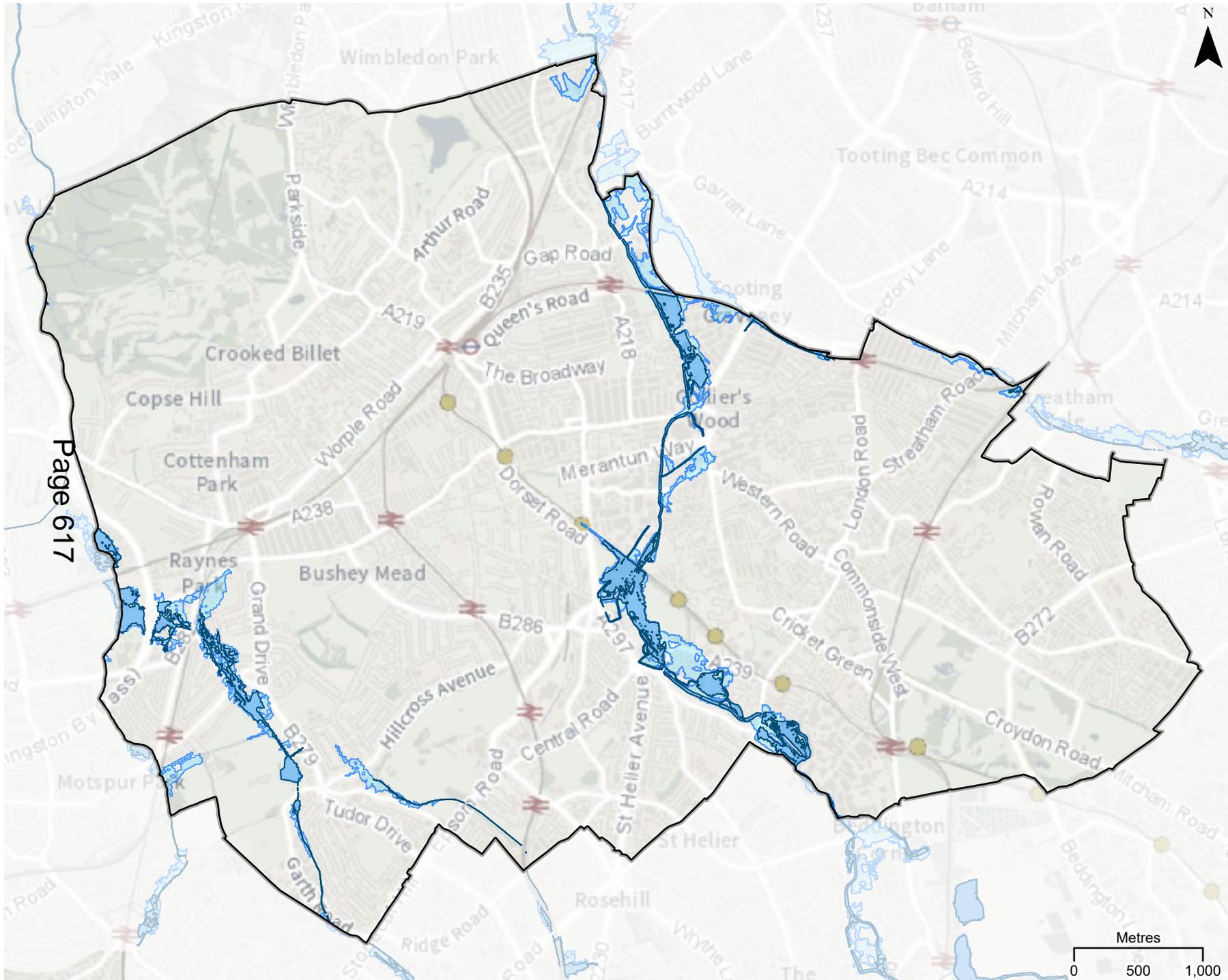




- Legend**
- Locally Listed Buildings
 - Conservation Areas

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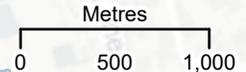


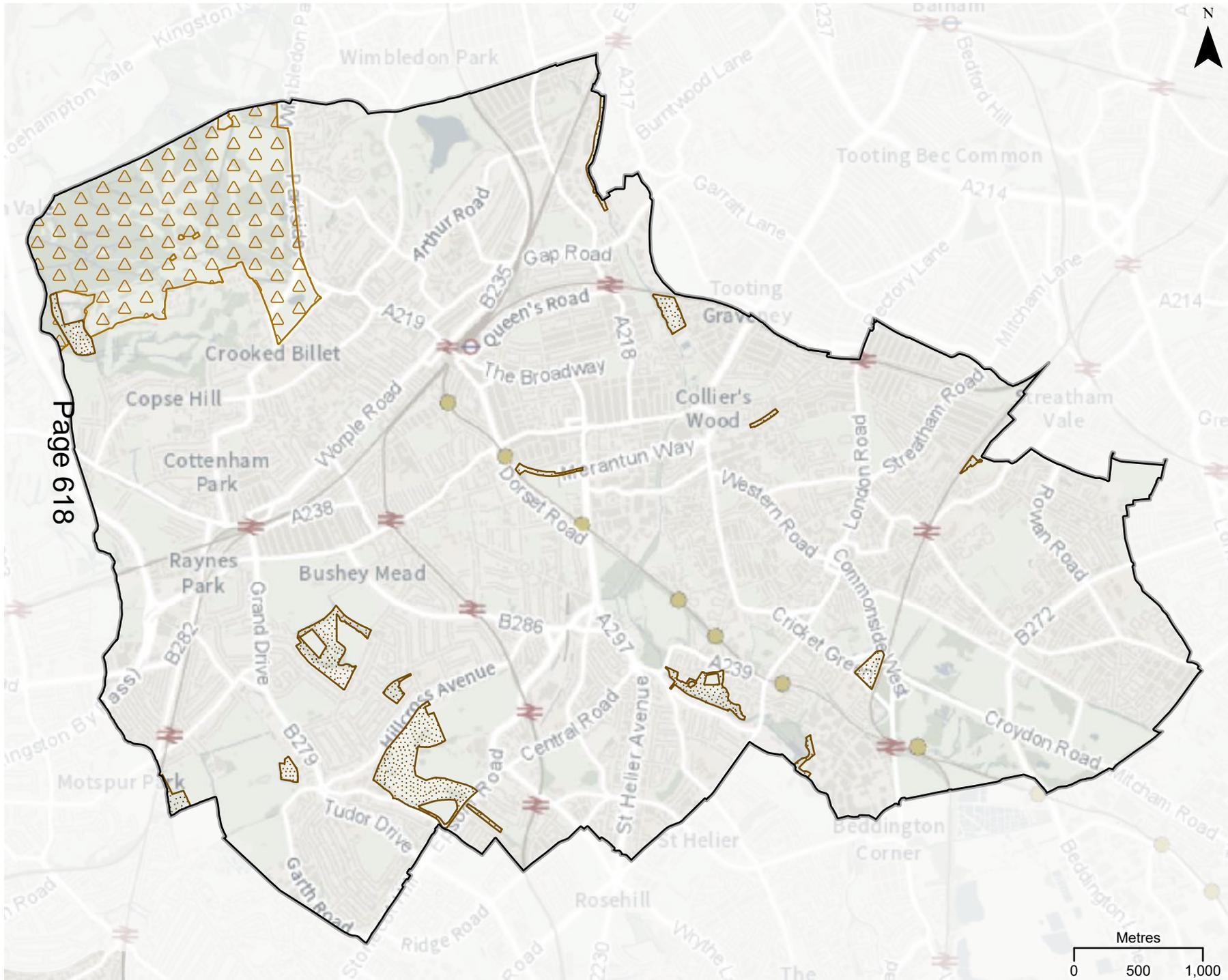
Legend

- Flood Zone 3b
- Flood Zone 3a



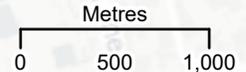
Page 617



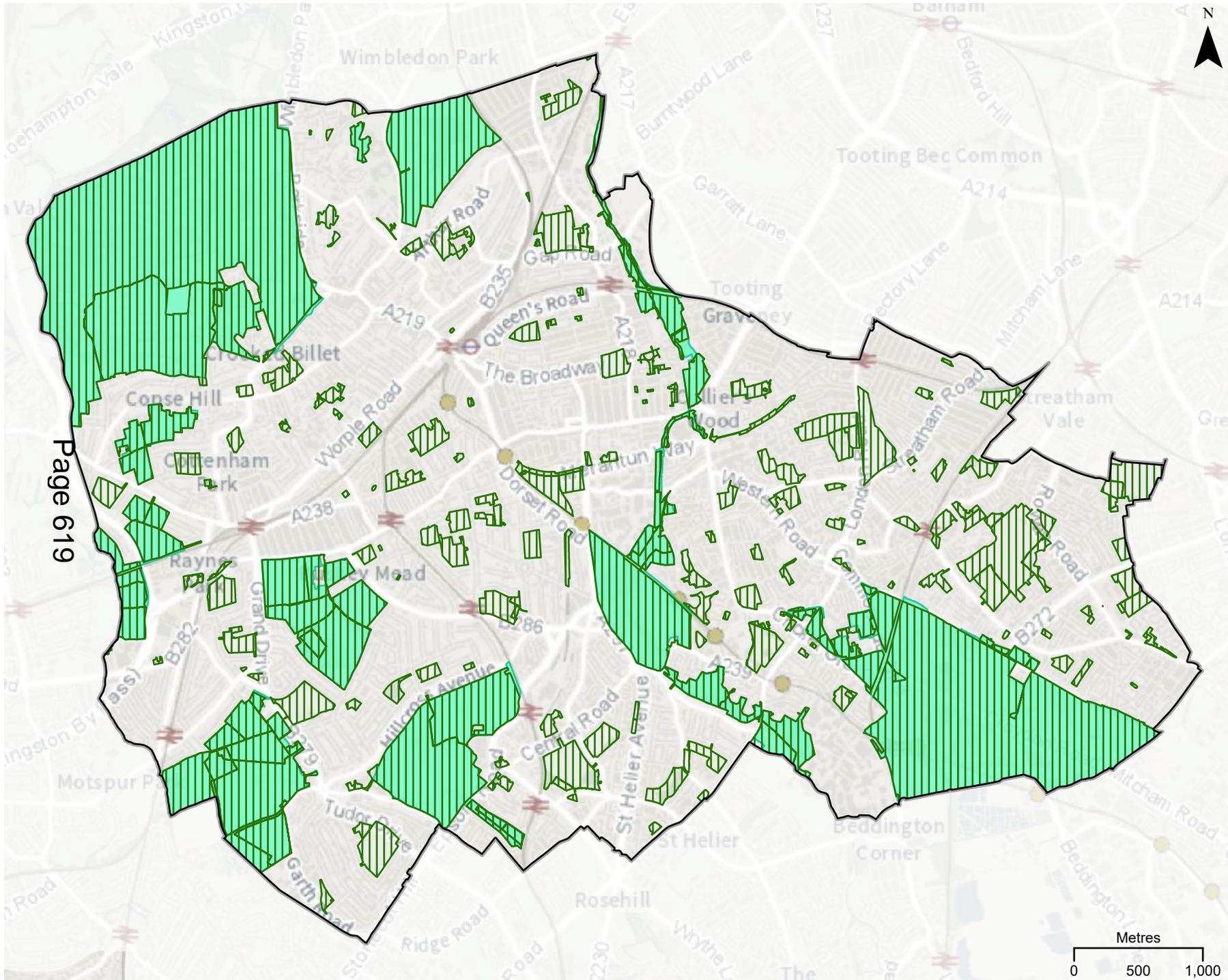


Legend

-  Local Nature Reserves
-  SSSI



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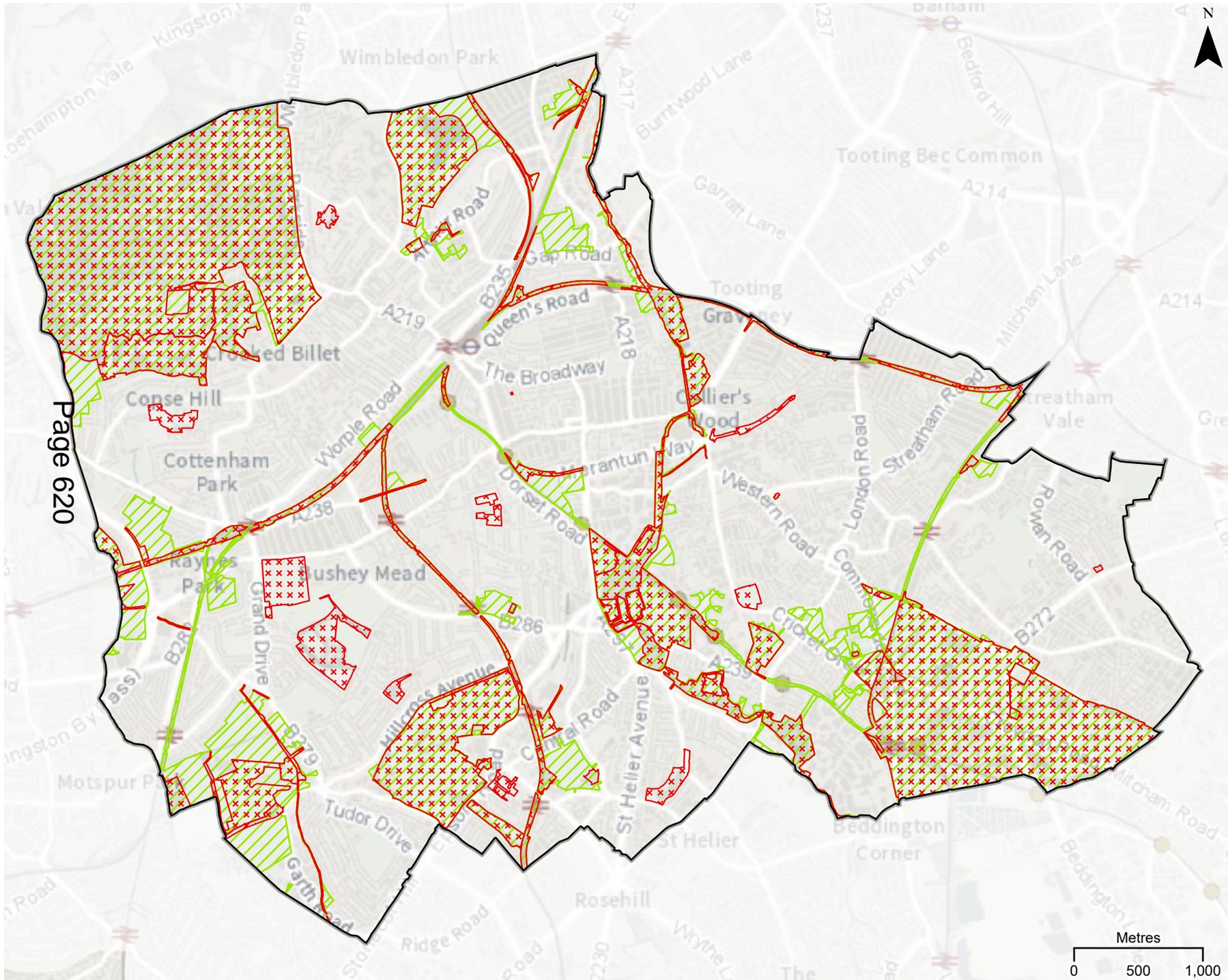


Legend

-  Open Space
-  MOL

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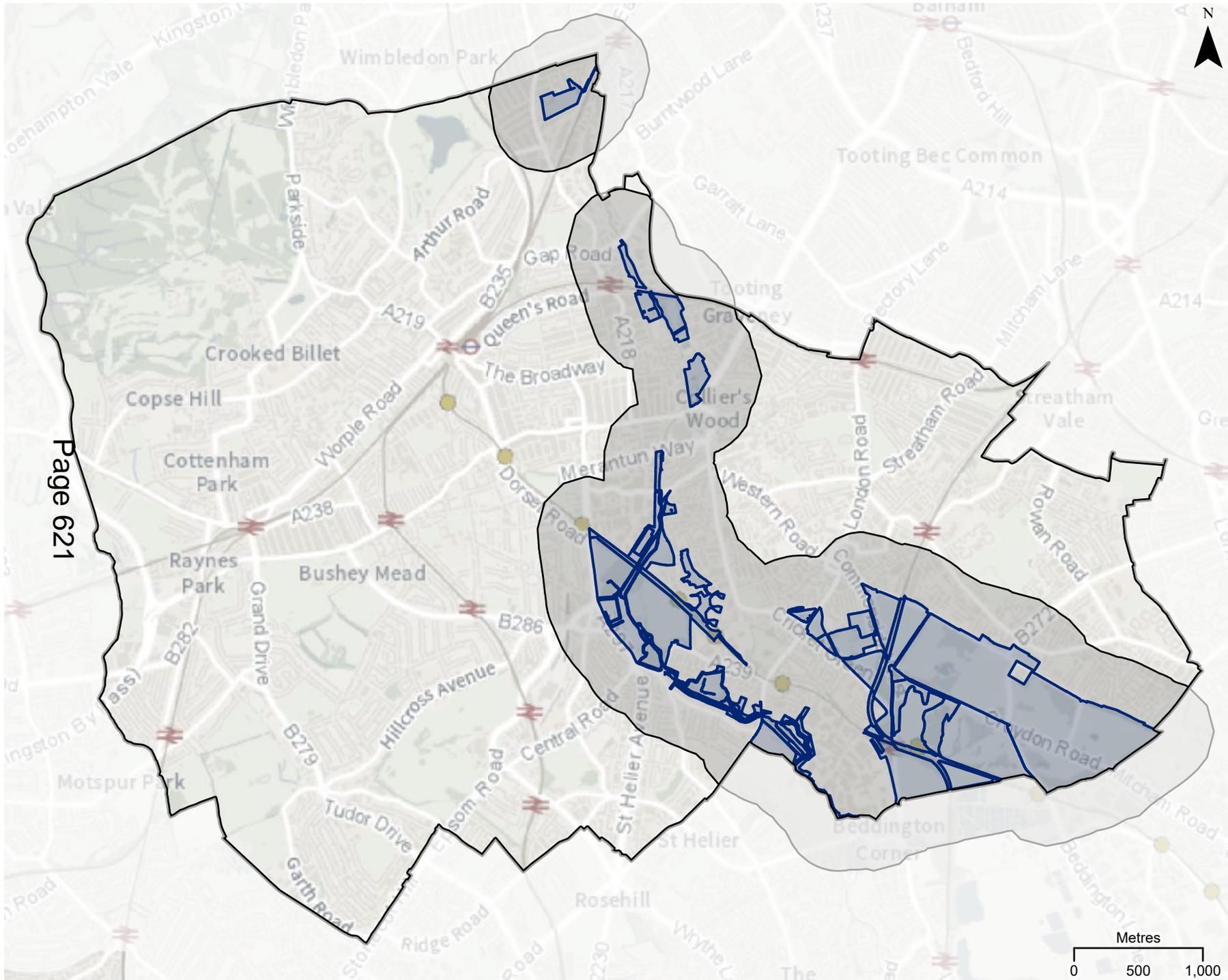


Legend

-  SINCs
-  Green Corridors

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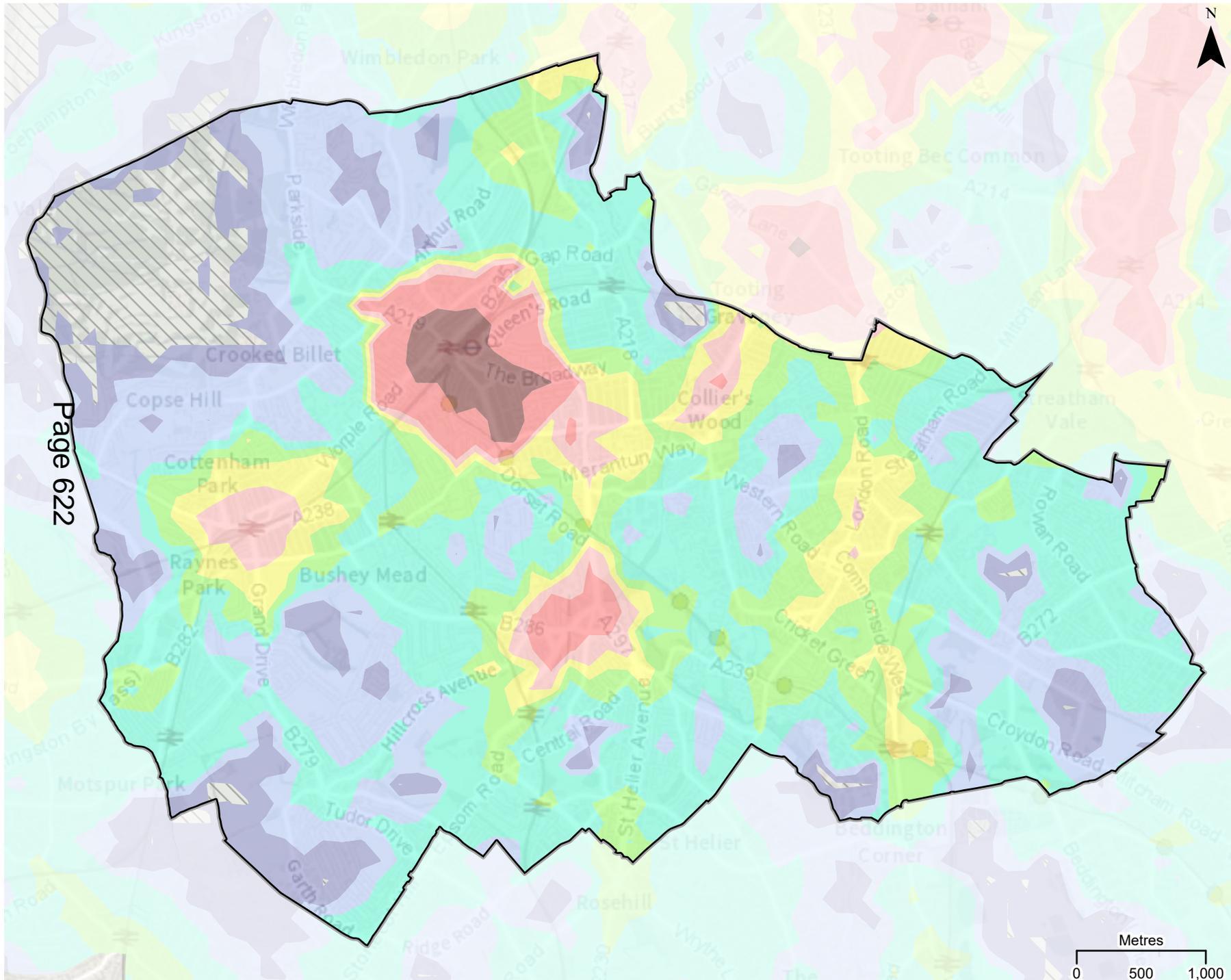




Legend

- Wandle Valley Regional Park
- Wandle Valley Regional Park Buffer 400m

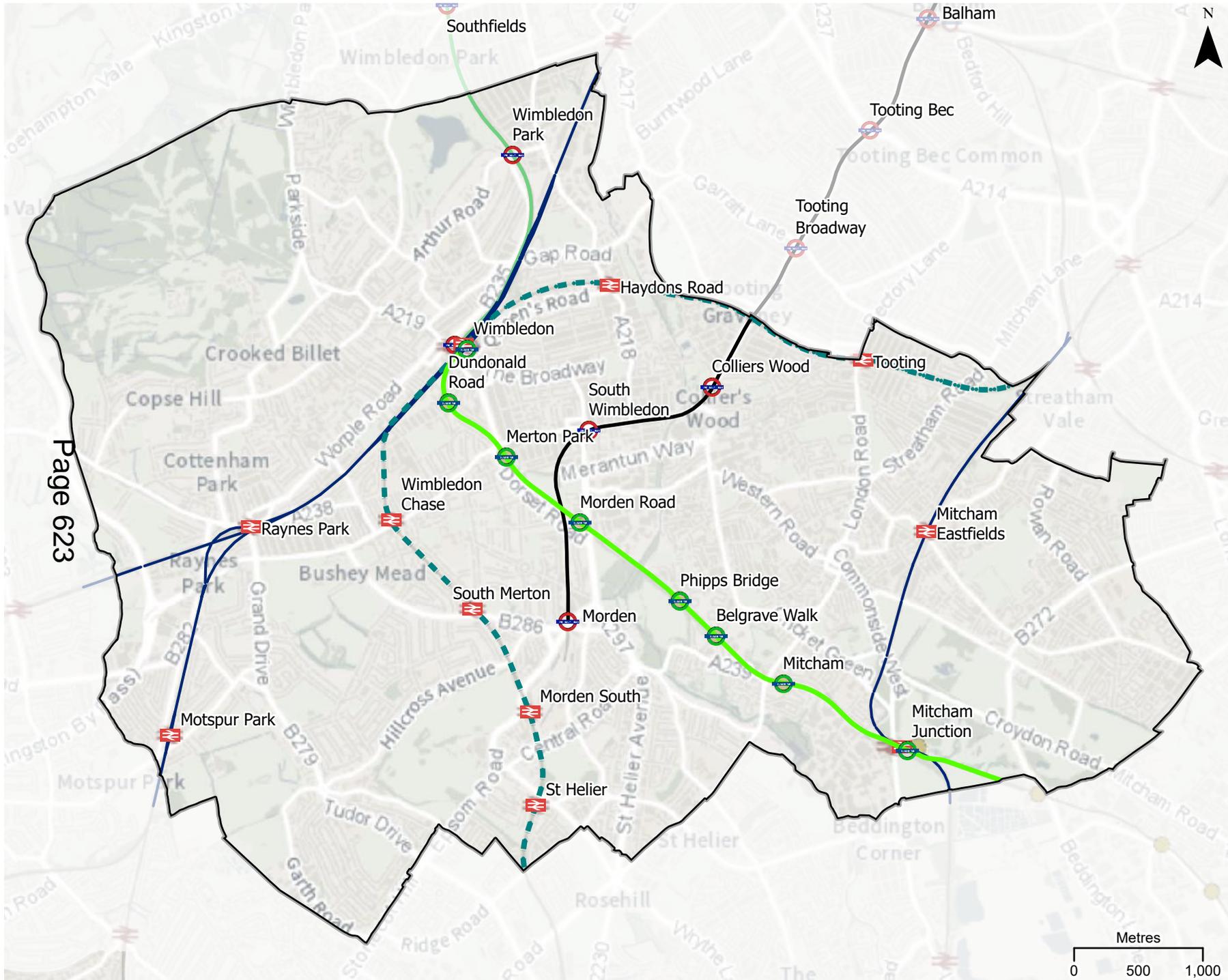




- Legend**
- PTAL 2021
- 0 (Hatched pattern)
 - 1a (Dark purple)
 - 1b (Light purple)
 - 2 (Cyan)
 - 3 (Light green)
 - 4 (Yellow)
 - 5 (Pink)
 - 6a (Red)
 - 6b (Brown)

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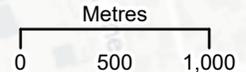


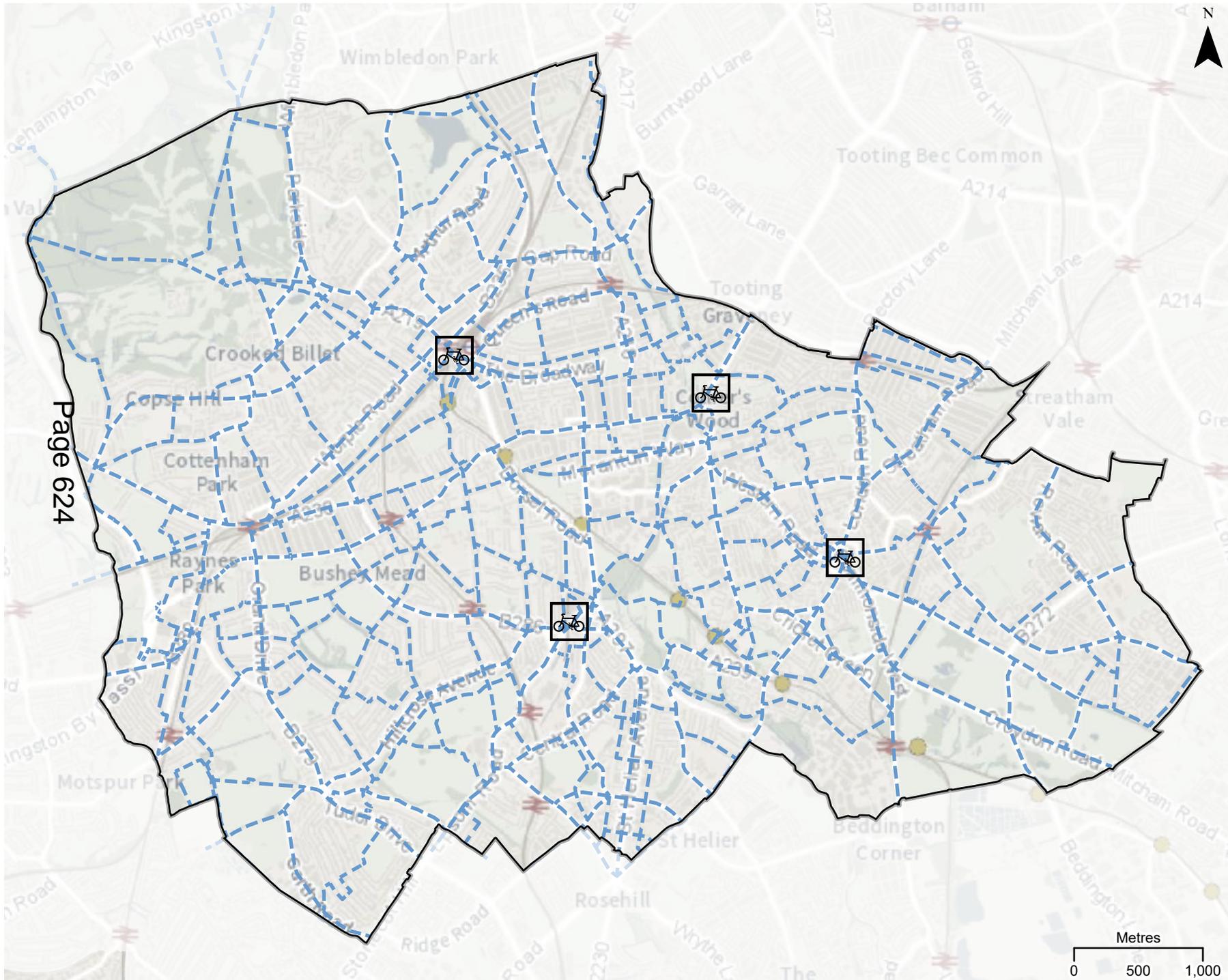


- Legend**
-  Tramlink_Stops
 -  London Trams
 -  Railway_Stations_2021
 -  Thameslink_2021
 -  National_Rail_2021
 -  Underground_Stations
 -  District Line
 -  Northern Line



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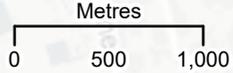


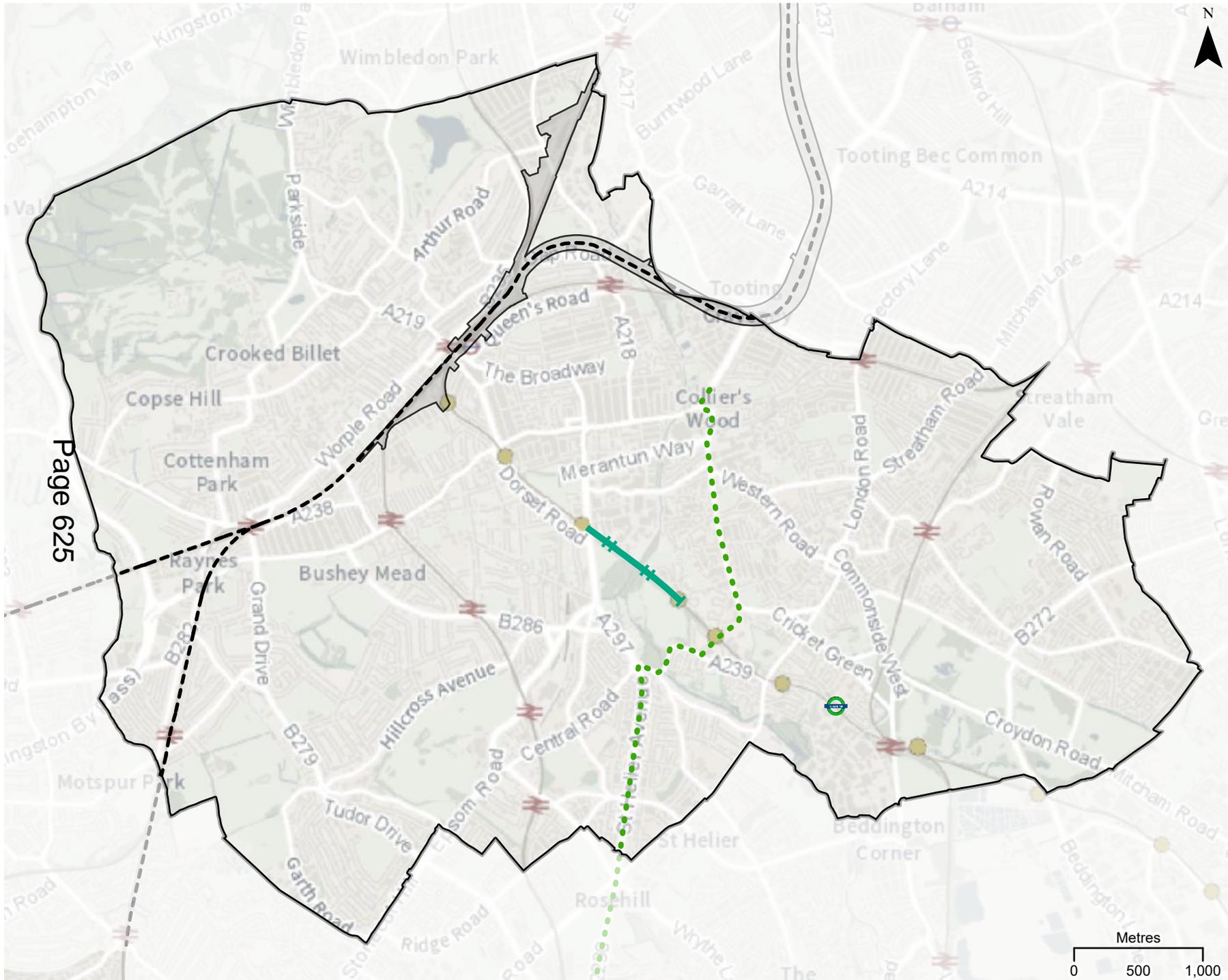
Legend

-  Cycle Hubs
-  Cycle Network



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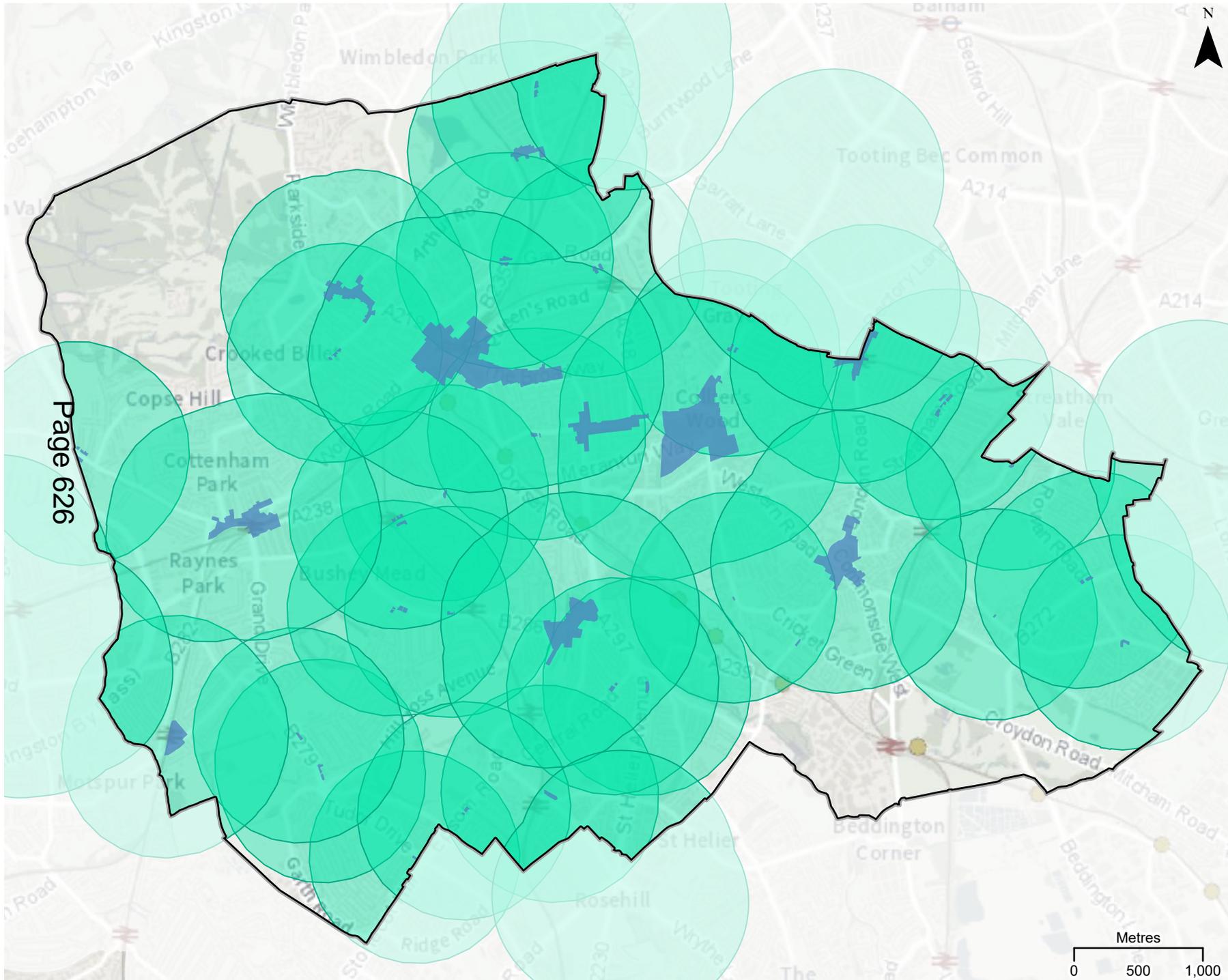




- Legend**
- ⋯ Colliers Wood - Sutton Tram extension
 - Crossrail 2 Indicative Route
 - █ Crossrail 2 Safeguarding
 - +— Dual Track Tram Line
 - ⊙ Willow Lane Tram Stop

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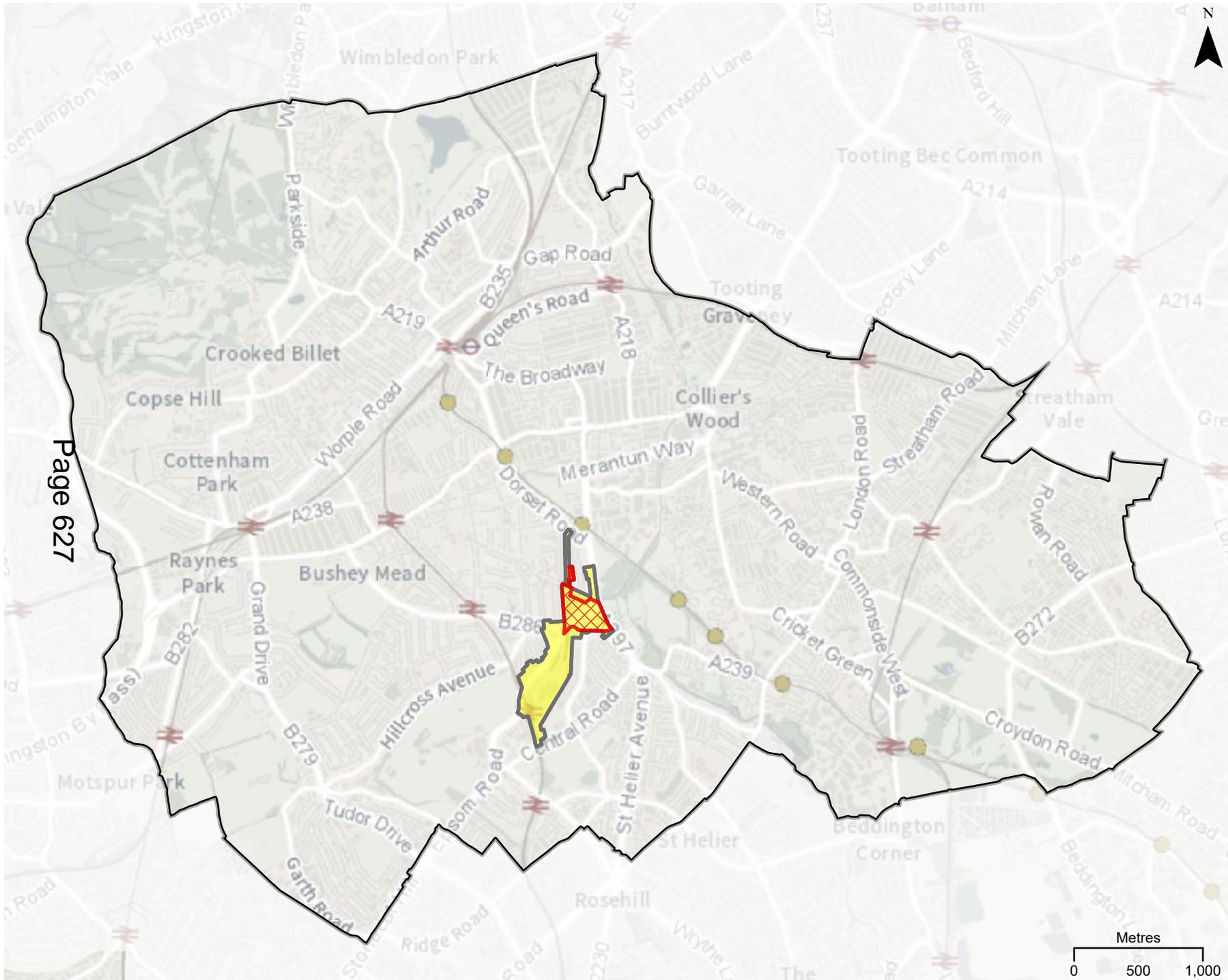


Legend

- Neighbourhood Centres
- 800m buffer / 10 minute walk

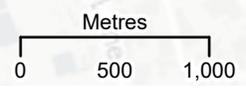
Page 626

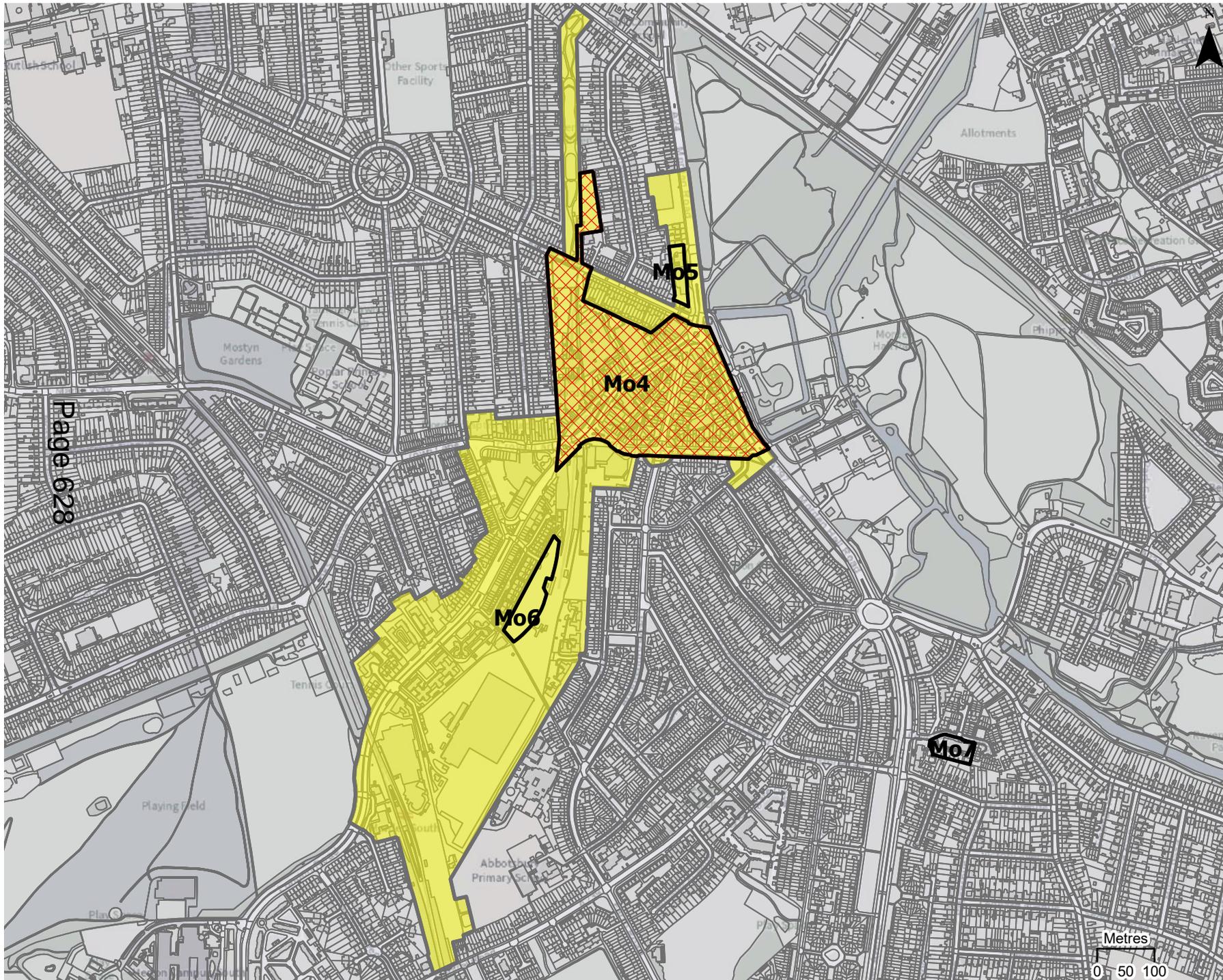




- Legend**
-  Morden Regeneration Zone
 -  Wider Morden Town Centre Area

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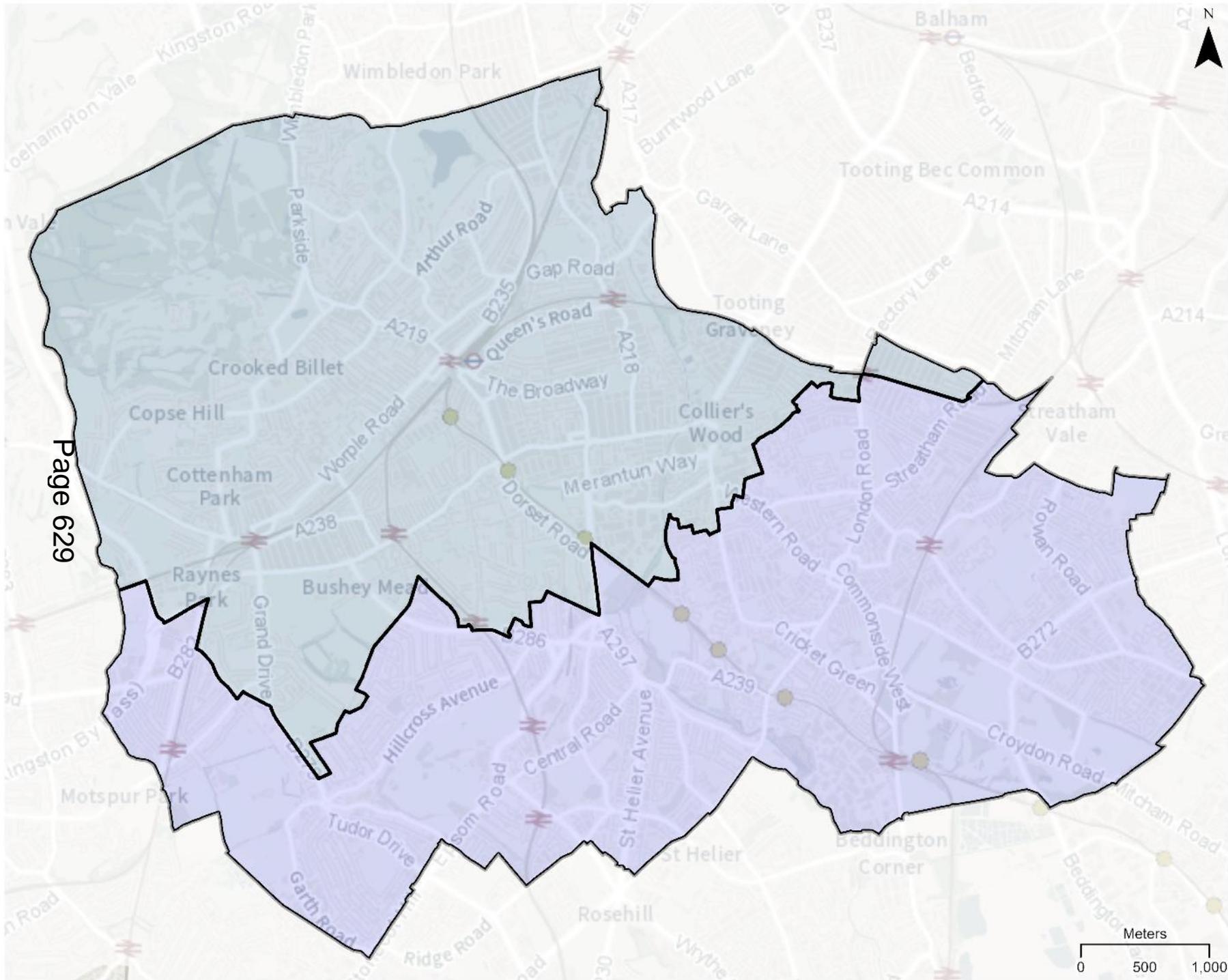


Legend

-  Site Allocation
-  Morden Regeneration Zone
-  Wider Morden Town Centre Area

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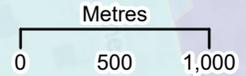
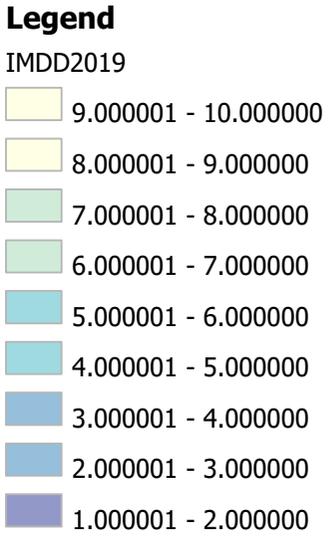
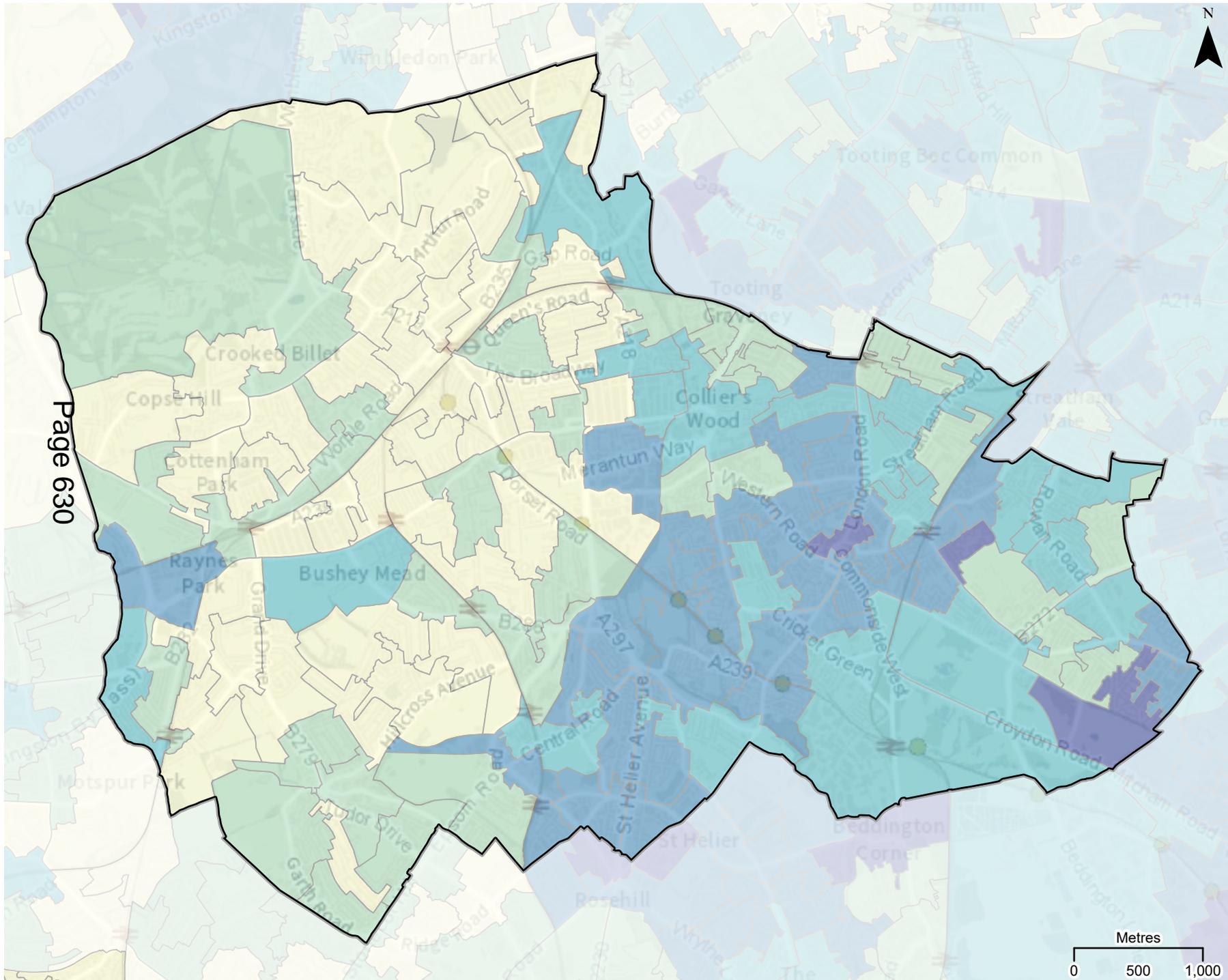


Legend

CIL

-  Merton CIL Boundary
-  Colliers Wood, Raynes Park, Wimbledon
-  Mitcham, Morden, West Barnes





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Merton's Local Plan 2021

Sustainability Appraisal (SA) incorporating Strategic
Environmental Assessment (SEA) – stage C

Pre submission

June 2021

Non-technical summary

Purpose of sustainability appraisal

- I. This is the Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA) for Merton's proposed submission Local Plan (stage 3), Environment Report. The timetable for the Local Plan towards adoption can be found in figure 3 This report is stages C1 and D1-D2 of the SEA/SA process (see figure 1)
- II. SEA Regulations 2004 Schedule 2 (6) states that:
The likely significant effects on the environment, including short, medium- and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as:
- | | |
|------------------|--|
| a) Biodiversity. | h) Air. |
| b) Population. | i) Climatic factors. |
| c) Human health. | j) Material assets. |
| d) Fauna. | k) Cultural heritage, including architectural and archaeological heritage. |
| e) Flora. | l) Landscape; and |
| f) Soil. | m) The inter-relationship between the issues |
| g) Water. | |
- III. The purpose of Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating *social, economic, and environmental* considerations into the preparation of new or revised plans and strategies. It is imperative to begin SEA at the first stages of plan making to find the key sustainability issues that are affected by the implementation of the plan; it helps with creating development options and assesses any significant effects of the proposed development. SA/SEA's are a valuable tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.

The SEA processes

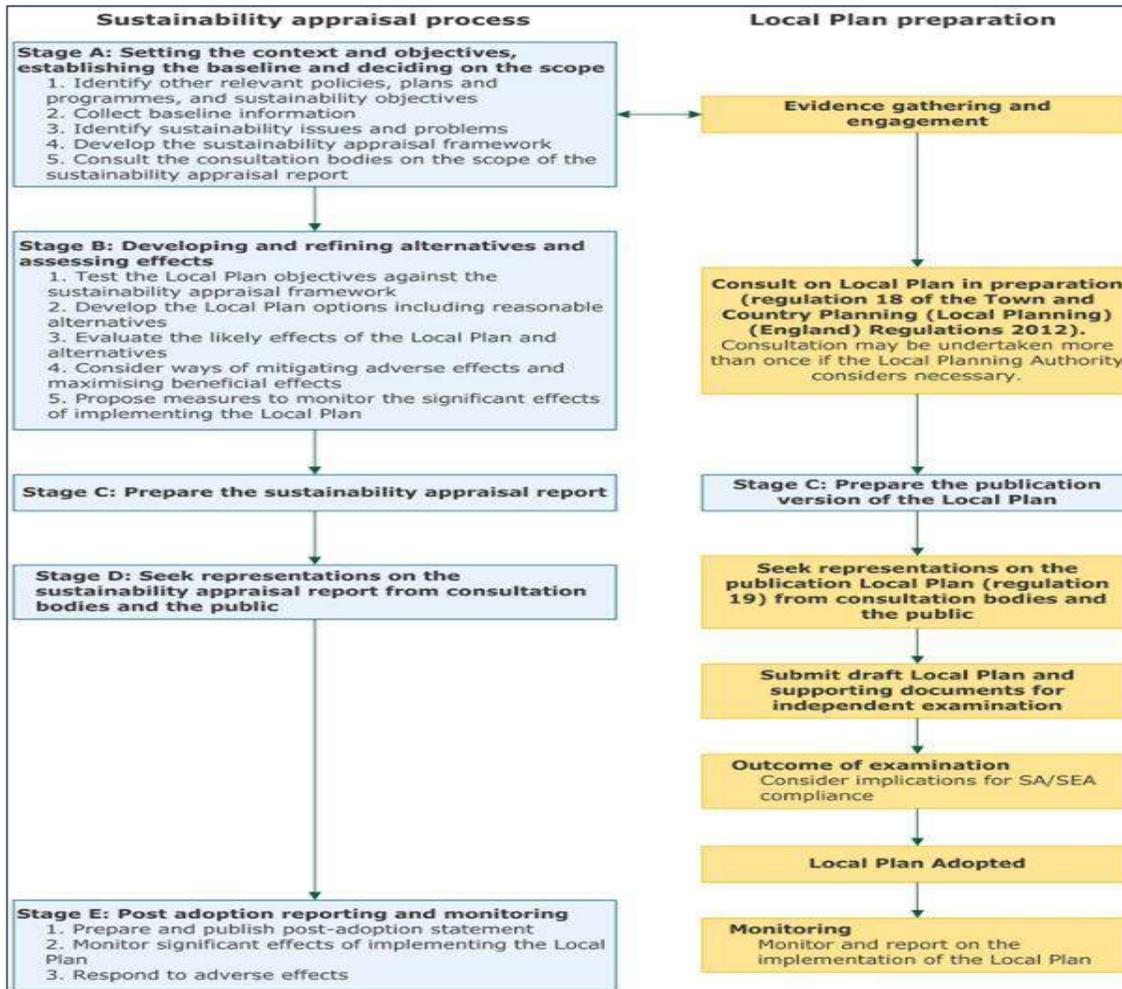
- IV. The SEA is an iterative process informing each consultation stage of the Local Plan's development. The aim of the SEA is to decide which impacts are likely to be significant and therefore, what the assessment should concentrate on. This has been achieved by the selection of SEA objectives and indicators which will be used to measure the impact of the plan.

Figure x: Stages in the SEA process

SEA stages and tasks	Purpose
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.	
Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed, and to help to identify SEA objectives.
Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring; to help in the development of SEA objectives.
Identifying environmental problems	To help focus the SEA and streamline the later stages, including baseline information analysis, setting of the SEA objectives, prediction of effects and monitoring.
Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
Consulting on the scope of SEA	To ensure that the SEA covers the likely significant environmental effects of the plan or
Stage B: Developing and refining alternatives and assessing effects.	
Testing the plan or programme objectives against the SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan or programme and the SEA objectives and help in developing alternatives.
Developing strategic alternatives	To develop and refine strategic alternatives.
Predicting the effects of the plan or programme, including alternatives	To predict the significant environmental effects of the plan or programme and alternatives.

Evaluating the effects of the plan or programme, including alternatives	To evaluate the predicted effects of the plan or programme and its alternatives and assist in the refinement of the plan or programme.
Mitigating adverse effects	To ensure that adverse effects are identified and potential mitigation measures are considered.
Proposing measures to monitor the environmental effects of plan or programme implementation.	To detail the means by which the environmental performance of the plan or programme can be assessed.
Stage C: Preparing the Environmental Report	
Preparing the Environmental Report	To present the predicted environmental effects of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision-makers.
Stage D: Consulting on the draft plan or programme and the Environmental Report	
Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report	To give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report and to use it as a reference point in commenting on the plan or programme. To gather more information through the opinions and concerns of the public.
Assessing significant changes	To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and considered.
Making decisions and providing information	To provide information on how the Environmental Report and consultees' opinions were considered in deciding the final form of the plan or programme to be adopted.
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment.	
Developing aims and methods for monitoring.	To track the environmental effects of the plan or programme to show whether they are as predicted; to help identify adverse effects.
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified.

Figure x: Sustainability Appraisal process and Local Plan preparation



- V. The national Planning Practice Guidance (PPG) states that:
The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.
- VI. Figure x sets out the key outputs of the SA process in relation to the new Local Plan in terms of the expected timescale for the preparation of SA Reports for public consultation.

Figure x: Key Outputs of the SA process

Stage of the plan	Key Appraisal Outputs (publication of SA Reports)	Timescale
Evidence Gathering	SA Scoping Report: SA Tasks A1-A5	2018-2021
Consultation on Issues and Options	SA Report on Issues & Options: SA Tasks B1-B6	Stage 2: November 2018-January 2019 Stage 2a: November 2020-February 2021
Pre-submission publication of Local Plan: Proposed Submission	SA Report on Pre- Submission: SA Tasks C1 and D1-D2	Subject to councillor decision June and July 2021, (circa July-September 2021 for six weeks)
Submission of Local Plan incorporating minor changes to the Secretary of State	SA Report on Submission Draft incorporating minor changes: SA Tasks C1 and D1-D2	TBC
Examination-in-Public	TBC: SA Tasks C1 and D1-D2	TBC
Inspector's report	TBC: SA Tasks C1 and D1-D2	TBC
Adoption of Local Plan incorporating modifications	SA Report on modifications arising from Inspector's Report SA Task D3	TBC
Post-adoption	TBC: SA Tasks E1 and E2	TBC

What is the new Local Plan?

- VII. Merton has many assets, including superb transport links, beautiful open green spaces, heritage buildings, and a lively business sector. The new Local Plan will provide a sound basis for planning decisions. We know how important good planning decisions are for Merton residents, as they impact on the appearance of the local environment and how people use it. At the same time, it is in the interest of all who live and work in Merton to attract new talent and new business to enhance the borough's resilience to external change, sustain a buoyant long-term economy and ensure a quality built environment for generations to come.
- VIII. The new Local Plan is designed to help guide how the borough develops over time and create a vision that enables the council to successfully and responsibly manage growth, while always ensuring the best interests of the borough, its residents and businesses. Merton is rich in assets and the opportunities they inevitably create. It is a place ripe for sustained economic success, and the Local Plan will mean that for years to come there will be a sound and consistent approach to ensuring a bright future for the borough and all who live and work here.

Figure 3: Local Plan timetable

Stages	Dates
Call for sites	October 2017- January 2018
¹ Draft Local Plan (stage 2)	October 2018 – January 2019
Draft Local Plan (stage 2a)	November 2020- February 2021
Publication of pre-submission	Spring /summer 2021 (TBC)
Public enquiry	Summer 2021
Adoption	Winter 2021

¹ Another round of consultation is likely due to the Mayor's new housing target for London borough and the EiP of the new London Plan.

Figure 4 Measuring the likely impact of no local plan

Topic area	Sustainability issue(s)	Likely impact in the absence of a Local Plan
Air quality	<p>High levels of NO_x, PM₁₀, and PM₂₅ emissions from road traffic.</p> <p>London is not meeting legal value for NO₂.</p> <p>Exposure to poor air quality is unequal across the borough and some parts of the borough more exposed to air quality.</p>	<p>With no additional measures to tackle air quality, London will continue to be non-compliant with EU legal limits, with higher levels of exposure to harmful pollutants.</p> <p>Increasing economic growth and development will lead to increased emissions from construction, buildings car uses and congestion leading to localised air quality issues in Merton.</p>
Climate change	<p>Transport is likely to continue to contribute to CO₂ emissions.</p> <p>CO₂ emissions from buildings likely to continue to rise.</p> <p>Increase in extreme weather events such as flooding, drought, heat exposure and associated adverse health risks to population and potentially pressures to health services.</p> <p>Growing ageing population and increase in children may lead increase in vulnerable population.</p> <p>Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect</p>	<p>Climate change effects will continue to increase and occur more often, such as increased temperatures, droughts, severe storms and other extreme weather events and flooding seen in the recent years.</p>
Energy use and supply	Insufficient low carbon energy supply.	Without additional measures energy use is likely to

	High number of Merton residents living in fuel poverty.	increase having an adverse impact to in creating a more sustainable borough.
Water recourse and quality	Need to reduce water usage and consumption per capita.	Increase demand for water and deterioration of water quality.
Flood risk	Risk of flooding to property and people from river, surface water, sewer, groundwater and reservoir. Increase in run-off, potential contamination and disruption of flows.	Without additional measure to prevent development in areas of flood risk and mitigate against increasing flood risk, the number of people/properties at risk will increase.
Nature environment (Biodiversity/open space).	The loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development. Impact of climate change and threat of new pest and diseases. Poor connectivity to green infrastructure.	The increase of development pressure will reduce the amount of green space and reduce the quality of existing green spaces with no funding or investment.
Historic Environment (Heritage, architectural and archaeological heritage)	Heritage assets at risk from neglect, decay, inappropriate development and air pollution. Pressure of development on the settings and surrounding area of heritage assets.	Heritage assets likely to be protect by way of legislation, however the environment will continue to be most at risk from increased pressure development.
Design	Poor quality public realm Poor design of the built environment, not adopting an inclusive design approach from the outset. Risk of poor design, lack of legible neighbourhoods and sense of place.	Design challenges for Merton's built and natural environments may not be consistently addressed.
	Non efficient use of land.	Pressures from development and competition between the types of development uses will increase,

Sustainable land use	<p>Lack of land for housing development to meet Merton's housing needs.</p> <p>Higher density development.</p> <p>Competing pressures for land will impact on the ability to provide social infrastructure and green infrastructure.</p> <p>Integration of land use and transport.</p>	which may lead to unsustainable patterns.
Soil and geology	<p>Threat to geodiversity because of increased demand for development.</p> <p>Remediation of contaminated land</p>	<p>Greater impact on geology and soils from development.</p> <p>Innovative solutions to reduce the impact of the cost of remediation are also needed.</p>
Noise	Increased noise from night-time economy, freight movement and deliveries associated with mixed used developments.	Likely increase of the population exposed to noise and noise related activities.
Demographic change	<p>Increase in Merton's population.</p> <p>Growing ageing and diverse populations.</p> <p>Uncertainty of the composition of the population, including migration patterns.</p>	Such increases in population likely to lead to increased pressure and competition for land for different types of development.
Social Integration	<p>Increased aging population</p> <p>Remaining causes of multiple deprivation.</p> <p>Ageing population may lead to more isolation.</p> <p>Lack of cohesion.</p>	Benefits /dis-benefits of growth are likely to affect groups of people differently, especially vulnerable communities.

	Risk of poor design, a lack of legible neighbourhoods and a sense of place.	
Health and health inequalities	<p>Increased health inequalities across the borough, especially wards in the east of the borough.</p> <p>Increase pressures on the health service and service provisions.</p> <p>Differences in life expectancy in east of the borough and diverse communities.</p> <p>Widening social inequalities.</p> <p>Low levels of physical activities in children and adults and some diverse communities.</p> <p>Increasing child obesity</p>	<p>Obesity is a growing problem in Merton; problem is significantly worrying in the east of the borough.</p> <p>Increased pressures on the health sector to deal with complex health needs.</p>
Crime and safety	<p>Perception of lack of safety.</p> <p>Fear of crime is creating a barrier to activities for some communities.</p> <p>Vulnerability of different groups (for ethnic minority groups and Protected characteristic groups).</p> <p>More vibrant night-time economy may lead to an increased fear of crime.</p>	<p>Social isolation of some groups is likely to increase as their fear of crime or anti-social behaviour will make them more reluctant to go out and use facilities, services including libraries, shops, green spaces or use public transport.</p>
Housing	<p>Lack of affordable housing</p> <p>Lack of housing meeting local needs/under supply</p>	<p>Challenges to meet housing demands in Merton (including requirements size, type tenure) are likely to increase.</p>

	Increase in homelessness.	
Education and skills	Variations in educational achievement and attainment across the borough Lack of support for transition from education to work	Inability to access high paid jobs may have a significant impact on people from deprived areas, BAME (Black and Asian Minority Ethnic) groups and women. Increase in the levels of social deprivation and poverty.
Local employment	Disparities between the east and west of the borough in types of jobs available or occupied by population in part of the borough. Disparity between wages and the cost of living Lack of diversity in jobs available across the borough	Disparities between wages and cost of living and lack of diversity in jobs could impact on Merton's economic growth and stability. Ability to attract a flexible and diverse work force.
Economic growth	Increased pressure infrastructure due to economic growth Lack of high speed and efficient digital connectivity in some part of the borough. Loss of employment land because of housing supply pressures. Insufficient floorspace to meet needs. Lack of affordable business space for small and medium size businesses and start-ups. Adverse impact on town centres as a result of reduction in demand for floorspace.	Without investment in Merton's infrastructure and land use policies to ensure the sufficient provision of employment and business spaces (type, location and cost), Merton cannot have a sustainable local economy. This is likely to threaten Merton's growing local economy, job creation and continuous sustainable growth. All of which will have a direct adverse impact to local populations.

Appraisal method

IX. The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new Local Plan is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended. Several guidance documents have been issued in relation to SA/SEA and the methodologies outlined in these have been used where still applicable:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister (November 2005)
- Practical Guide to the SEA Directive, Office of the Deputy Prime Minister (September 2005).
- Sustainability Appraisal Planning Policy Manual, Planning Advisory Service (2009); and
- Sustainability Appraisal: advice note, Planning Advisory Service (2010).

Figure 5: SA scoring matrix

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
0	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
--	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

Figure 6: Sustainability Appraisal objectives

Sustainability objectives		SEA Topic requirements
SO1	Air quality: To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Air Human Health Population
SO2	Biodiversity: To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Biodiversity Flora Fauna
SO3	Land and soil condition and pollutants: To conserve Merton's geodiversity and protect soils from development and over intensive use.	Soil Landscape Human Health Biodiversity Flora Fauna
SO4	Sustainable land use: To make the best and most efficient use of land to support sustainable patterns and forms of development.	Landscape
SO5	Heritage (including architectural and archaeological heritage): To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Cultural heritage, including architectural and archaeological heritage.
SO6	Flood risk management: To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Water Climate Factors Human health
SO7	Climate change: To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Climate Factors Material assets
SO8	Noise and vibration: To minimise noise, vibration levels and disruption to people and communities.	Human Health
SO9	Water quality: To protect and enhance Merton's water bodies.	Water Human Health Flora Fauna
SO10	Water consumption: Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Water Human

SO11	Open space and nature: To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	Biodiversity Flora Fauna Climate Factors Soil Landscape
SO12	Sustainable transport: To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	Population
SO13	Energy use: To improve energy efficiency in new developments and increase renewable energy supply / provision.	Climate Factors Material Assets
SO14	Health and wellbeing: To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Human Health Population
SO15	Housing: To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.	Human Health Population Material Assets
SO16	Safe environments: To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Human Health Population
SO17	Population demand and growth: To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.	Human Health Population Material Assets
SO18	Social inclusion and cohesion: To ensure Merton has socially integrated communities which are strong, resilient and inclusive.	Human Health Population
SO19	Design: To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	Human Health Population Air Climate Factors Landscape
SO20	Local employment: To develop and maintain a healthy labour market.	Human Health Population Material assets
SO21	Education and skills: To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with	Population Human Health

	disabilities and Black Asian and Minority Ethnic groups.	Material assets
SO22	<p>Economic growth:</p> <p>To increase the vitality and viability of existing town centres, local centres and parades</p> <p>To ensure that there is a mixed of business spaces including, affordable spaces in Merton.</p>	<p>Population</p> <p>Human Health</p> <p>Material assets</p>

SA Assessment Framework and decision-making criteria.

Figure x: SA framework and decision-making criteria.

Sustainability Objectives	Decision making criteria.	Assessing of Local Plan Policies
<p>Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</p>	<ul style="list-style-type: none"> Will it impact on locations that are sensitive to air pollution? 	<p>Analysis of:</p> <ul style="list-style-type: none"> The whole borough is an Air Quality Management Area
<p>Biodiversity To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</p>	<ul style="list-style-type: none"> Will it impact on national, regional or local BAP habitats and/or species? Does it affect a site designated for nature conservation purposes? Will it impact on access to nature? Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non-designated sites? Will it impact on existing networks of open spaces and create new green spaces? Will it lead to a degradation or fragmentation of the green spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> Sites designated for nature conservation purposes, including SSSI and SINCC (Sites of Importance to Nature Conservation). Existing on-site habitats and biodiversity
<p>Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.</p>	<ul style="list-style-type: none"> Will it safeguard soil quality and quantity? Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non-designated sites? Will it impact on existing networks of open spaces and create new green spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> Potential contaminated land Existing use and buildings
<p>Sustainable land use To make the best and most efficient use of</p>	<p>Does it make a positive impact? Does it support positive sustainable patterns?</p>	<p>Analysis of:</p> <ul style="list-style-type: none"> Existing use and buildings

<p>land to support sustainable patterns and forms of development.</p>	<p>Will it bring disused sites into use, which benefits local residents?</p>	<ul style="list-style-type: none"> • Vacant site • Derelict site • Potential options for future land uses
<p>Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.</p>	<ul style="list-style-type: none"> • Will it affect the significance of heritage assets through direct impacts or impacts on their setting? • Will the design enhance the local character? • Have opportunities that make a positive contribution to the local character and area been identified? • Will it impact on any potential archaeological remains? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Historic Parks and Gardens • Conservation Area(s) • Listed Building(s) • Archaeological Priority Area
<p>Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>	<ul style="list-style-type: none"> • Will the proposal be affected by flooding, i.e. is it within zone 2, 3a or 3b? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? • Will it impact or increase the risk of flooding to other people and property? • Will it promote and include climate change adaptation measures? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Location within flood zone • Surface water maps • Localised flooding maps, where available
<p>Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.</p>	<ul style="list-style-type: none"> • Will it promote and include climate change adaptation measures? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses

<p>Noise and vibration To minimise noise, vibration levels and disruption to people and communities.</p>	<ul style="list-style-type: none"> • Will it impact on locations that are sensitive to noise pollution? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Water quality To protect and enhance Merton's water bodies.</p>	<ul style="list-style-type: none"> • Will it impact on water quality? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</p>	<ul style="list-style-type: none"> • Will it impact on water quality? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.</p>	<ul style="list-style-type: none"> • Will it increase or decrease public open space deficiency? • Will it lead to loss or degradation of designated spaces such as MOL (Metropolitan Open Land)? • Will it improve connectivity between existing open spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Metropolitan Open Land • Historic Parks and Gardens
<p>Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</p>	<ul style="list-style-type: none"> • Will it increase access to essential services? • Will it assist in improve health and wellbeing? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Area of relative disadvantage • Access to essential services • Public open space deficiency • Town Centre Boundary • Public Right of Way

<p>Energy use To improve energy efficiency in new developments</p> <p>Increase renewable energy supply / provision.</p>	<ul style="list-style-type: none"> • Will it improve and reduce energy use? • Will it lead to more energy efficient uses? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses
<p>Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.</p>	<ul style="list-style-type: none"> • Will it reduce the health inequalities in areas of poor health? • Will it improve mental health and wellbeing? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities • Potential options for future land uses
<p>Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand</p>	<ul style="list-style-type: none"> • Will it increase the number of homes? • Will it increase the number of affordable homes? • Will it reduce the number of unsuitable/unfit homes? • Does it achieve Lifetime Homes Standard and increase accessibility for wheelchair users? 	<ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses • Conservation Areas • Public Health plans and strategies • Wider determinates of health • Areas of deprivation
<p>Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities • Potential options for future land uses

<p>Population demands and growth. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.</p>	<ul style="list-style-type: none"> • Will it reduce the levels of socio-economic inequalities? • Will it ensure that developments such as housing and essential services meet demographic demands and growth? • Will it provide sustainable development that will reduce inequalities? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Areas of deprivation and inequalities • Local services/essential services • Predicted population projections. • Public Health England health profiles
<p>Social inclusion and cohesion To ensure Merton has socially integrated communities which are strong, resilient and inclusive.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it reduce deprivation? 	<p>Analysis of: Disadvantaged areas/inequality</p>
<p>Design To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.</p>	<ul style="list-style-type: none"> • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it reduce the use of the car? • Will it assist in building strong communities? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Disadvantaged areas/inequality • Potential options for future land uses
<p>Local employment To develop and maintain a healthy labour market.</p>	<ul style="list-style-type: none"> • Will it lead to the creation of jobs? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment data from NOMIS • Employment use • Disadvantaged areas/inequality
<p>Education and skills</p>	<ul style="list-style-type: none"> • Will it impact on the local economy? 	<p>Analysis of:</p>

<p>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and BAME groups.</p>	<ul style="list-style-type: none"> • Will it lead to local economic growth? • Does it provide jobs? • Will it increase employment opportunities? • Will it increase training and skilled employment? 	<ul style="list-style-type: none"> • Employment use • Disadvantaged areas/inequality
<p>Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.</p>	<ul style="list-style-type: none"> • Will it improve business development? • Will it impact on the local economy? • Will it lead to local economic growth? • Does it provide jobs? • Will it meet local business needs? • Will the site/land use include commercial development? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Employment use • Town Centre Boundary • Area of Mixed Use

- X. The figure below assesses the Local Plan Strategic Objective against the Sustainability Objectives. The Strategic Objectives apply to the whole of Merton and provide a framework for the Local Plan, acting as stepping stones to deliver the Spatial Vision. Merton’s Community Plan and the London Plan have guided Merton’s Strategic objectives. The main report assesses the individual policies of the Local Plan.

Figure 7: Local Plan Objectives

Local Plan Objectives	Sustainability Objectives																						
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	
Supporting Resilience	Light Green	Light Green	White	Light Green	Light Green	Light Green	Dark Green	White	White	White	White	Light Green	Light Green	Dark Green	White	White	Light Green						
Good growth	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	Light Green	Dark Green	Dark Green	Dark Green									
Tackling Climate Change	Light Green	Light Green	Light Green	Light Green	White	Light Green	Dark Green	Light Green	Dark Green	Light Green	White	White	Light Green										
Places and the 20 minute neighbourhood	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green
Places for people	Light Green	Light Green	White	White	Light Green	White	White	White	White	White	White	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Dark Green	Light Green	Light Green	Light Green	Light Green	Light Green

- XI. The Local Plan Strategic Objectives perform strongly against the Sustainability Objectives, collectively meeting all the Sustainability Objectives.

- XII. The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- XIII. Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. In line with a precautionary approach, those SA objectives against which no significant adverse effects have been identified but uncertainty is recorded have been included in the monitoring framework. Significant adverse effects and/or uncertain effects have been identified against all SA objectives apart from SA objectives (18), social inclusion.

Figure 8: Local Plan monitoring indicators.

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
Air quality To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Number of days p.a. when air pollution is moderate or high for PM10* <i>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre, more than 35 times a year, at any measuring site.</i>	Merton Council by way of Merton’s Annual Monitoring Report (AMR)	3 years
Biodiversity	Changes of in areas of	Merton Council by way	3 years

To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	biodiversity importance.	of Merton's AMR (Authority Monitoring Report)	
Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Environment Agency and Merton Council by way of Merton's AMR	Every year
Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.	Planning permission grant and completed	Merton Council by way of Merton's AMR	Every year
Heritage (including architectural and archaeological heritage) To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Number of Listed Buildings at risk	Merton Council by way of Merton's AMR (Authority Monitoring Report)	Every year
Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Number of planning permissions granted contrary to Environment Agency advice.	Environment Agency and Merton Council by way of Merton's AMR.	Every year

Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Percentage reduction in carbon emissions from commercial and residential	Merton Council by way of Merton's AMR.	Every 3 years
	Proportion of new non-residential buildings over 100sqm to meet the relevant BREEAM (Building Research Establishment Environmental Assessment Method) "excellent" standard.	Merton Council by way of Merton's AMR	Annually by way of the Annual Borough Report (AMR)
Noise and vibration To minimise noise, vibration levels and disruption to people and communities.	An increase of areas of the Noise action planning important areas.	Defra	3 years
Water quality To protect and enhance Merton's water bodies.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. River water bodies classified under the Water Framework Directive to achieve good ecological status.	Environment Agency and Merton Council by way of Merton's AMR	Every year
Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.	Thames Water and, Sutton and East Surrey Water companies.	3 years

	Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.	Merton Council by way of the AMR	
Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	The proportion of net loss open space for development apart for educational establishments.	Merton Council by way of the AMR	Every year
Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	The proportion of journeys made by public transport and sustainable mode of travel. Increase in footfall at bus stops, underground, tram stops and railway stations.	Merton Council and Transport for London (TfL) by way of the AMR	3 years
Energy use To manage and reduce demand for energy.	Average percentage improvement over Part L of the Building Regulations Installed capacity of renewable energy in Merton.	Merton Council by way of the AMR	2 years
Health and wellbeing. To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Delivery of healthcare facilities. Number of people taking up	Merton Council, Merton Public Health, CCG (Clinical Commissioning	3-5 years

	<p>physical activities and stating they are in 'good health.'</p> <p>Number of Health Impact Assessments carried out and type of development.</p>	<p>Groups) and other health and wellbeing partners.</p> <p>Merton Council and Merton Public Health</p>	<p>3- 5 years.</p>
<p>Housing To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand</p>	<p>Proportion of affordable homes.</p> <p>Proportion of housing tenure</p>	<p>Merton Council by way of the AMR</p>	<p>Every year</p>
<p>Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.</p>	<p>Number of Health Impact Assessments carried out and type of development.</p>	<p>Merton Council and Merton Public Health</p>	<p>3 years</p>
<p>Infrastructure To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.</p>	<p>Number and of healthcare provision The number of pharmacies and any gaps in provision in the borough.</p>	<p>Infrastructure Delivery Plan (live document)</p> <p>Public Health, Pharmacy Needs Assessment</p>	<p>Annually</p> <p>5 years</p>
<p>Design To create attractive, mixed use neighbourhoods, ensuring new buildings</p>	<p>Increase number of major schemes reviewed by the Design Review Panel at pre –</p>	<p>Merton Council by way of the AMR</p>	<p>Annually</p>

and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	application stage.		
Local employment To develop and maintain a healthy labour market.	Number of people unemployed Number of new jobs created.	Merton Council, Merton Chamber of Commerce and Jobcentre Plus	Every year
Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.	Deliver to meet statutory delivery to secure sufficient school places. Number of 16- 24-year-olds in training or apprenticeships or work programmes Number of new local people employed or in training as part of large or regeneration developments.	Merton Council by way of the AMR	Every year
Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.	Maintain the retail vacancy rate below national and regional rates.	Merton Council by way of the AMR	Every year

Other assessments

Habitat Regulation Assessments

XIV. The need for habitats regulations assessment (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive') as set out in the Conservation of Habitats and Species Regulations 2010 (as amended). The Regulations seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

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XV. Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects. The following four European sites are located within or in relatively proximity to the plan area and are therefore potentially affected by the new Local Plan:

- Richmond Park SAC (Special Area of Conservation)
- Wimbledon Common SAC

Health Impact Assessments

XVI. The purpose of HIA (Health Impact Assessment) is to promote sustainable development by integrating health (including mental health) and wellbeing considerations into the preparation of plans or strategies; by identifying the key health and wellbeing issues and the groups that are likely to be affected by the implementation of the Plan.

Equalities Impact Assessment (EqIA)

XVII. The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand

and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before the Act came into force there were several pieces of legislation to cover discrimination, including:

- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995

XVIII. At the decision making stage local authorities are required to assess how changes to polices and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics'- which includes the following:

- Age
- Disability
- Sex/Gender
- Race or belief
- Religion
- Sexual Orientation
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity

XIX. The purpose of the EqIA is to assess the impact of a policy, strategy or service in the borough in terms of race, gender and disability. The consideration of religion, age and sexual orientation are also encouraged. Although the subsequent Equality Act 2010 removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to 'give due regard' to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

SA/SEA: Technical report

1 Purpose of Sustainability Appraisal and incorporating the Strategic Environment Assessment (SEA)

i. The EU (European Union) Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK (United Kingdom) by the SEA Regulations 2004, requires environmental assessment to be undertaken on all plans and programmes where they are likely to have significant environmental impacts.

ii. SEA Regulations 2004 Schedule 2 (6) states that:

The likely significant effects on the environment, including short, medium- and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—

- a) Biodiversity.
- b) Population.
- c) Human health.
- d) Fauna.
- e) Flora.
- f) Soil.
- g) Water.
- h) Air.
- i) Climatic factors.
- j) Material assets.
- k) Cultural heritage, including architectural and archaeological heritage.
- l) Landscape; and

m) The inter-relationship between the issues

- 1.3 The purpose of Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating *social, economic, and environmental* considerations into the preparation of new or revised plans and strategies. It is imperative to begin SEA at the first stages of plan making to identify the key sustainability issues likely affected by the implementation of the plan; it helps with creating development options and assesses any significant effects of the proposed development. SA/SEA's are a valuable tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.
- 1.4 The purpose of this Report is to develop and refine alternatives and assessing the effects by:
- Test the Local Plan objectives against the SEA/SA objectives
 - Developing strategic alternatives
 - Predicting the effects of the Local Plan, including alternatives
 - Evaluating the effects of the Local Plan
 - Mitigating adverse effects
 - Proposing measures to monitor the environmental effect of the Local Plan.
 - Consulting the public and the statutory environmental bodies on the draft plan and report
- 1.5 At the conclusion of plan preparation, the final SA/SEA report should show how the final Local Plan (herby referred to as the 'Plan') has addressed the sustainability agenda and the choices made between alternative policies and proposals. The Inspector, when deciding the 'soundness' of the plan at the Public Examination stage, will consider this.
- 1.6 The NPPF states that assessments should be proportionate and should not repeat policy assessment that has already been undertaken. Wherever possible the local planning authority should consider how the preparation of any assessment will contribute to the plan's evidence base. The process should be started early in the plan making process and key stakeholders should be consulted in identifying the issues that the assessment must cover.

- 17 The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is appropriate for the content and level of detail in the Local Plan.

2 Review of other plans

- 2.1 A review of plans was initially carried out for the [Scoping Report](#) (November 2018) and reviewed at each stage of the SEA/SA process.

International
Kyoto Protocol to the United Nations Framework convention on climate change (1997)
Johannesburg Declaration on Sustainable development 2002
The UN Sustainable Development Goals (SDGs) 2015
UNESCO World Heritage Convention
European
Brexit Bill 2019
EU Biodiversity Strategy (2020)
European Landscape Convention (ratified by the UK Government in 2006)
EU Sixth Environment Action Plan (Sustainable Development Strategy) (2002)
European Spatial Development Perspective Report (1999)
EU (European Union) Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)
Air Quality Framework (EU Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)
Assessment of the Effects of Certain Public and Private Projects on the Environment (EIA (Environmental Impact Assessment) Directive 85/337/EEC)

Assessment and Management of Environmental Noise (END Directive 2002/49/EC)	
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)	
Conservation of Wild Birds (Directive 79/409/EEC)	
Energy Performance of Buildings (EU Directive 2002/91/EC)	
Energy Efficiency (Directive 2012/27/EU)	
Floods Directive (EU Directive 2007/60/EC)	
Landfill Directive 1999/31/EC	
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	
Renewable Energy (EU Directive 2009/28/EC)	
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	
Urban Wastewater Directive (91/271/EEC)	
Waste Framework Directive 75/442/EEC	
Water Framework Directive (EU Directive 2000/60/EC)	
National Regulations	
Emerging Planning reforms –White Paper	
Use class order 2020.	
Air Quality Standards Regulations (2010)	These Regulations replace the Air Quality Standards Regulations 2007 implement the following Directives: Directive 2008/50/EC on ambient air quality and cleaner air for Europe (this Directive replaces Council Directive 96/62/EC on ambient air quality assessment and management, Council Directive 1999/30 EC (European Commission) relating to limits for sulphur dioxide, nitrogen dioxide, oxides of nitrogen, particulate matter and lead in ambient air, Council Directive 2000/69/EC relating to limit values for benzene and carbon monoxide in ambient air, Council directive 2002/3/EC relating to ozone in ambient air.) Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic

	aromatic hydrocarbons in ambient air.
Conservation of Habitat and Species Regulations, 2017	The Conservation of Habitats and Species Regulations 2017 (the “Habitats Regulations”) transposes the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives)
Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2010) and (Part G Sanitation, hot water safety and water efficiency, 2010)	Part L – Conservation of fuel and power. The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect on 1 October 2010 and provide practical guidance on ways of following the energy efficiency requirements and regulation 7 of the Building Regulations 2010 (SI2010/2214) for England and Wales. The 2010 edition of Approved Document G - Sanitation, hot water safety and water efficiency, has been updated to incorporate amendments made to reflect any changes arising because of the Building Regulations 2010 and replaces the previous edition of Approved Document G - Sanitation, hot water safety and water efficiency.
Climate Change Act (2008) The Climate Change Act 2008 (2050 Target Amendment) Order 2019	The Climate Change Act aim is to manage and responding to climate change in the UK. Legislation requiring the government to reduce the UK's net emissions of greenhouse gases by 100% relative to 1990 levels by 2050
Community Infrastructure Levy Regulations 2010 (and subsequent amendments	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and

	Wales to help deliver infrastructure to support the development of their area.
Deregulation Act 2015	The Deregulation Act provides for the removal or reduction of burdens on businesses, civil society, individuals, public sector bodies and the taxpayer. As far as are practicable all necessary technical housing standards should now be included in the main building regulations rather than within development plans. The act provides for an amendment to be made to the Planning and Energy Act 2008. Section 1(1)(c) of that Act provides that local planning authorities may include in their plan's requirements that development in their area meets higher standards of energy efficiency than are required by building regulations. The government policy meanwhile is that new dwellings meet a zero-net carbon emissions standard from 2016. Building regulations should also provide for optional requirements. Local planning authorities will be able where circumstances justify it, to make it a condition of planning permission for developments that they comply with one or more such optional requirements, which will then apply to the development as building regulations requirements and be inspected and enforced as such.
Energy Act 2008	The Energy Act 2008 updates energy legislation to: <ul style="list-style-type: none"> reflect the availability of innovative technologies and emerging renewable technologies correspond with the UK's changing requirements for secure energy supply protect our environment and the taxpayer as the energy market changes

Environment Bills 2021/22 (pending)	
The government's 25 year Environment Plan	A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation.
National Flood and Coastal Erosion Risk Management Strategy for England (2020)	<p>The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.</p> <p>Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change.</p> <p>Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.</p> <p>A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action.</p>
EA2025 action plan	<p>The Environment Agency vision for the future into action. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> • a nation resilient to climate change • healthy air, land and water • green growth and a sustainable future.

Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts.
Environmental Noise (England) Regulations 2006 (as amended)	The regulations move the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Flood and Water Management Act 2010	<p>The Act updates legislation to ensure; better protection from flooding, manage water more sustainably, improve public services and secure water resources during periods of drought. The Flood and Water Management Act gives local authorities new responsibilities. There are now classed as lead local flood authorities (LLFAs) who have responsibilities for managing local flood risk in their area. The responsibilities of a LLFA (Lead Local Flood Authority) include:</p> <ul style="list-style-type: none"> prepare and maintain a strategy for local flood risk management in their areas, co-ordinating views and activity with other local bodies and communities through public consultation and scrutiny, and delivery planning maintain a register of assets – these are physical features that have a significant effect on flooding in their area investigate significant local flooding incidents and publish the results of such investigations establish SUDS approval bodies (SABs) that will be responsible for the approval of design, build and adoption of SUDS issue consents for altering, removing or replacing certain structures or features on ordinary watercourses play a lead role in emergency planning and recovery after a flood event
Flood Risk and Coastal Change, 2014	Advises how to take account of and address the risks associated with

	flooding and coastal change in the planning process.
Flood Risk Assessments: Climate Change Allowances, 2017	The Flood Risk Assessments: Climate Change Allowances advice updates previous climate change allowances to support NPPF. The Environment Agency (EA) has produced it as the government's expert on flood risk.
Growth and Infrastructure Act 2013	The Act sets out reforms intended to reduce red tape, that the government considers hampers business investment, new infrastructure and job creation.
Housing and Planning Act 2016	Through this Act, the Government aims to take forward proposals to build more homes that people can afford, give more people the chance to own their own home and ensure the way housing is managed is improved. The Act seeks to achieve this in part, by implementing reforms that will make sure that the planning system does not add any unnecessary obstacles to the delivery of new homes. The Act includes provision for the delivery of Starter Homes and Social Housing. The Act also provides for "permission in principle" ("PIP") for housing led development, which will provide developers with greater certainty of consent at an earlier stage in the development cycle.
Local Government White Paper: Strong and Prosperous Communities (2009)	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified

	arrangements for delivering Government policy. The Act is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning Act (2008)	The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new streamlined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy (CIL).
Localism Act (2011)	The Localism Act takes power from central government and hands it back to local authorities and communities giving them the freedom and flexibility to achieve their own ambitions. There are five key measures

	<p>in the Localism act:</p> <ul style="list-style-type: none"> Community Rights Neighbourhood Planning Housing Empowering cities and other local areas General power of competence <p>Dissimilar parts of the Act will come into effect at separate times.</p>
<p>National Planning Policy Framework (2019), NPPF draft 2021, Nation Planning Policy for Waste (2014) and National Planning Practice Guidance (2021)</p>	<p>The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. The NPPF sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. At the heart of the NPPF is a presumption in favour of sustainable development. For plan making this means that:</p> <p>local planning authorities should positively seek opportunities to meet the development needs of their area.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or specific policies in this Framework indicate development should be restricted <p>For decision taking this means:</p> <ul style="list-style-type: none"> approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

	any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or specific policies in this Framework indicate development should be restricted
Neighbourhood Planning Regulations (2012)	The Regulations set out the procedure for the designation of neighbourhood areas, neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders).
Sustainable Communities Act 2007 (Amended 2010) and Sustainable Communities Regulations 2012	The Sustainable Communities Act 2007 provides an opportunity for communities to identify legislative barriers that prevent them from improving the sustainability of their local areas and discuss them with their local authorities. If the barrier needs Government action to remove it, local authorities can ask government to remove it.
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales
The Town and Country Planning (Environmental Impact Assessment) (Amendment) (England) Regulations 2008	These Regulations amend the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1991 so that they apply to applications for subsequent approval of matters under conditions attached to planning permissions.
The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999	These regulations outline the procedure for considering environmental impact when deterring planning permission applications.
The Town and Country Planning (Environmental Impact	These Regulations replace the Town and Country Planning

<p>Assessment) Regulations 2011</p> <p>And Amendment 2015</p>	<p>(Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI No. 293) (“the 1999 Regulations”) and subsequent amending instruments. The Town and Country Planning (Environmental Impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales. These regulations provide a consolidation of the 1999 regulations to reflect amendments to the EIA (Environmental Impact Assessment) directive and recent case law.</p>
<p>The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995</p>	<p>These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.</p>
<p>The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2010</p>	<p>This order amends the GDPO 1995 in relation to:</p> <ul style="list-style-type: none"> • Design and access statements • Publicity of planning applications • Time limits for lodging certain planning appeals • Provisions to include on the planning register applications for non-material amendments
<p>The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012</p>	<p>The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 (“GPDO”) by:</p> <p>adding a new Part 43 to Schedule 2 to introduce permitted development rights for solar panels, ground and water source heat pumps, and flues forming part of biomass and combined heat and</p>

	<p>power systems installed on non-domestic premises</p> <p>inserting new paragraphs into Parts 6 and 7 of Schedule 2 to clarify that permitted development rights can apply under those Parts to structures to house biomass boilers, anaerobic digestion systems and associated waste and fuel stores, and hydro turbines installed on agricultural and forestry units, and</p> <p>amending paragraph J of Part 40 of Schedule 2 (interpretation of Part 40) to delete the words “product and installation” from the definition of “MCS Planning Standards”.</p>
The Town and Country Planning (Local Planning) (England) Regulations 2012	The Regulations (a) consolidate the existing Town and Country Planning (Local Development) (England) Regulations 2004 and the amendments made to them; and (b) make new provision and amendments to take account of the changes made by the Localism Act 2011.
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.
The Water Resources Act 1991 (Amendment) E&W Regulations 2009	This Act aims to prevent and minimise pollution of water. The Environment Agency are responsible for ensure the Act is enforced. Under the act it is an offence to cause or knowingly permit any poisonous, harmful or polluting material, or any solid waste to enter any controlled water. Silt and soil from eroded areas are included in the definition of polluting material. If eroded soil is found to be polluting a water body or watercourse, the Environment Agency may prevent or clear up the pollution and recover the damages from the landowner or responsible person.
The Water Environment (Water Framework Directive)	The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 consolidate, revoke and replace the Water Environment

(England and Wales) Regulations (2017)	(Water Framework Directive) (England and Wales) Regulations 2003. The regulations aim to set out the provisions of the Directive in more detail rather than cross-referencing extensively to the Water Framework Directive (WFD).
The Water Act 2003	The four broad aims of the Act are: <ul style="list-style-type: none"> • the sustainable use of water resources. • strengthening the voice of consumers. • a measured increase in competition; and • the promotion of water conservation.
National: strategies /plans/ publications	
Air Quality Strategy DEFRA 2007	The strategy sets out air quality objectives and policy options to further improve air quality in the UK. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment.
Air Pollution: Action in a changing Climate 2010	This document does not replace the current air quality strategy but accounts for the rapid development of climate change policy since the strategy was published in 2007.
UK Post 2010 Biodiversity Framework	The Framework succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach' and is the result of a change in strategic thinking. The Framework demonstrates how the work of the four countries and the UK contributes to achieving the Aichi Targets, and identifies the activities required to complement the country biodiversity strategies in achieving the Targets.
Natural England's – England Biodiversity (2002)	England Biodiversity Strategy was published in 2002. It brings together England's key contributions to achieving the 2010 target to halt

	<p>biodiversity loss. It also seeks to make biodiversity part of mainstream thinking and emphasises that healthy, thriving and diverse ecosystems are essential to everybody's quality of life and wellbeing. The Strategy has five themes:</p> <ul style="list-style-type: none"> • Protecting the best wildlife sites • Promoting the recovery of declining species and habitats • Embedding biodiversity in all sectors of policy and decision making • Enthusing people • Developing the evidence base. • An important aim of the strategy is to deliver the UK Biodiversity Action Plan in England, and a measure of success of conserving England's biodiversity is how the status of priority species and habitats is changing.
<p>Biodiversity 2020: A strategy for England's wildlife and ecosystems 2011</p>	<p>Provides a comprehensive picture of how the international and EU commitments are being implemented. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The strategy aims to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.</p>
<p>Securing the Future: UK (United Kingdom) Sustainable Development Strategy (2005)</p>	<p>This sets out the national framework for Sustainable Development based on 4 central aims:</p> <p>social progress which recognises the needs of everyone effective protection of the environment prudent use of natural resources</p>

	<p>maintenance of high and stable levels of economic growth and employment</p> <p>The strategy sets five guiding principles to achieve sustainable development:</p> <ul style="list-style-type: none"> living within environmental limits ensuring a strong, healthy and just society achieving a sustainable economy promoting good governance using sound science responsibly
Sustainable Construction Strategy (2008)	<p>This Strategy is aimed at providing clarity around the existing policy framework and the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to sustainability Setting and committing to higher standards to help achieve sustainability in specific areas Making specific commitments by industry and Government to take the sustainable construction agenda forward
UK Low Carbon Transition Plan (2009)	<p>The low carbon transition plan sets out how the government is to meet its binding carbon budget of an 18% cut in emissions on 2008 levels by 2020 (34% on 1990 levels). It also allocated individual carbon budgets for the major UK government departments, which are expected to produce their own plans.</p>
Carbon Plan 2011	<p>The Carbon Plan was published in December 2011 and sets out the</p>

	<p>Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the 2050 target. This publication brings together the Government's strategy to curb greenhouse gas emissions and deliver our climate change targets, as well as the updated version of our actions and milestones for the next five years; replacing the draft Carbon Plan published in March 2011. Part 1, 2 and 3 of the report, Annex A and Annex B set out the Government's strategy for delivering carbon budgets and fulfil the legal obligation to report on what the UK is doing to ensure it meets carbon budgets set in law. Annex C of this report sets out, department by department, actions and deadlines for the next five years.</p>
<p>Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (DECC 2012)</p>	<p>This is an Energy Efficiency Strategy to maximise existing policy and realise the wider energy efficiency potential that is available in the UK economy.</p>
<p>Estate Regeneration National Strategy - Good Practice Guide Part 1, DCLG December 2016</p>	<p>The estate regeneration good practice guide sets out key considerations for schemes at the preliminary stages and a model process for successful regeneration. The guide is for all stakeholders in estate regeneration schemes for example landowners, residents, local authority officers and members, consultants, developers, public service providers, businesses and charities. It should be read in conjunction with the other components of the estate regeneration national strategy, including guidance on resident engagement and protection, finance and delivery.</p> <p>The guide sets out the principal activities, considerations, key participants and source material for typical regeneration projects at the preparation, planning or delivery stages of projects. This guidance does not intend to set out a list of mandatory requirements for estate</p>

	regeneration schemes. It is intended as a general good practice guide for all stakeholders to consider in relation to the characteristics and challenges of each individual scheme.
Laying the Foundations: A Housing Strategy for England (2011)	<p>A radical new strategy to reignite the housing market and get the nation building again was launched on 21 November by the Prime Minister. The Housing Strategy sets out a package of reforms to get the housing market moving again; lay the foundations for a more responsive, effective and stable housing market in the future; support choice and quality for tenants; improve environmental standards and design quality.</p> <p>The new strategy addresses concern across the housing market making it easier to secure mortgages on new homes, improving fairness in social housing and ensuring homes that have been left empty for years are lived in once again.</p>
The government's 25 year Environment Plan	A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation.
National Flood and Coastal Erosion Risk Management Strategy for England (2020)	<p>The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.</p> <ul style="list-style-type: none"> • Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change. • Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to

	<p>secure sustainable growth and environmental improvements, as well as resilient infrastructure.</p> <p>A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action</p>
EA2025 action plan	<p>The Environment Agency vision for the future into action. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> • a nation resilient to climate change • healthy air, land and water • green growth and a sustainable future.
Environmental Assessment of Plans and Programmes regulations 2004	<p>Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts.</p>
Healthy lives, healthy people: our strategy for public health in England 2010 and update 2011	<p>The strategy sets out a bold vision for a reformed public health system in England including:</p> <ul style="list-style-type: none"> • Local authorities to take new responsibilities for public health • Local authorities to be supported by a new integrated public health service such as Public Health England • A stronger focus to be placed on outcomes across the system • Public health as a clear priority and a core part of business

	<ul style="list-style-type: none"> • A commitment to reduce health inequalities.
DEFRA Sustainable Drainage Systems Non-Statutory Technical Standards for Sustainable Drainage Systems 2015	This document sets out non-statutory technical standards for sustainable drainage systems. They should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance.
Resources and waste strategy for England (December 2018)	strategy sets out how we will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England
Serious and organised crime (2018 review)	A review of serious and organised waste crime and its effects, making recommendations on a strategic approach to waste crime.
National Guidance and other Reference Documents	
Building Research Establishment Environmental Assessment Method (BREEAM)	
Environment Agency: Creating a better place. Our corporate strategy (2010-2015)	
Environment Agency: Climate Change, adapting for tomorrow (2009)	
Environment Agency: Water for people and the environment. Water resources strategy for England and Wales (2009)	
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	
English Indices of Deprivation (2015)	
National Heritage Protection Plan (2015-18)	
Guidance on Tall Buildings CABE (Commission for Architecture and the Built Environment) and English Heritage (2007)	
Model Procedures for the Management of Contaminated Land-Environment Agency.	

Regional: Plans/strategies	
Clearing London's Air: Air Quality Strategy (2010)	The strategy sets out a framework for improving London's air quality and measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues.
The Control of Dust and emission during construction and demolition (2014) SPG	The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London. It also aims to control nitrogen oxides (NOx) from these same activities by introducing an Ultra-Low Emissions Zone (ULEZ) for non-road mobile machinery.
Accessibility and Equity	
Equal Life Chances for All framework (2014)	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances and removing barriers that prevent people from reaching their full potential.
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2014)	This provides detailed guidance on the policies contained in the London Plan to make places usable by everyone especially disabled people.
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)	This SPG provides guidance to London boroughs, partners and developers on the implementation of policies in the London Plan, which relate to equalities issues and addressing the needs of London's diverse communities.
Climate Change and Energy	
Climate Change Mitigation and Energy Strategy (2011)	This strategy focuses on reducing CO2 emissions to mitigate climate change, securing a low carbon energy supply for London, and moving London to a thriving low carbon capital. It forms a central part of the Mayor's goal of retrofitting London. The Mayor's activity to achieve this

	<p>is well underway. His programmes are already making real cuts in CO2 emissions, improving quality of life for Londoners, and creating economic opportunities for the capital.</p>
<p>Managing risks and increasing resilience: Climate Change Adaptation Strategy for London (2010)</p>	<p>The Mayor’s Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> • identifies who and what is most at risk today • analyses how climate change will change the risk of flood, drought and heatwave through the century • describes what action is needed to manage the changes and who is responsible <p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> • To improve our understanding and management of surface water flood risk • An urban greening programme to increase the quality and quantity of green space and vegetation in London which will buffer London from floods and hot weather • To retro fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes.
<p>Be Seen Energy Monitoring Assessments Guidance (draft 2020).</p>	<p>This draft guidance provides further details on the ‘be seen’ stage of the energy hierarchy set out in the Mayor’s emerging London Plan which requires monitoring and reporting of the actual operational energy performance of buildings for at least five years post construction</p>

Culture	
Cultural Strategy: Cultural Metropolis (2010)	The Mayor's Cultural Strategy sets out his vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. The strategy recognises the significance of the cultural and creative sectors in making London a successful world city and puts forward a case for its continued support and investment – particularly in the run up to the 2012 Olympics and the opportunity it presents for London to undertake a step change in cultural activity and participation.
Economy and skills	
Mayors Economic Development Strategy (2010)	The Mayor's vision is for London to be the best big city in the world. The Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.
Mayor's Economic Development Strategy for London (2018)	<p>Sets out the Mayor's plans to grow London's economy, support businesses, boost innovation and create a city that works for all.</p> <p>The strategy has three main goals:</p> <p>Opening opportunities: everyone should be able to benefit from all our city offers</p> <p>Growth: ensuring our economy will continue to thrive and is open to business</p>

	<p>Innovation: to make London a world leader in technology and a hub of innovative ideas and creativity</p>
<p>Skills Strategy (2018)</p>	<p>The strategy outlines plan to create a post 16 technical and vocational education and skills system that meets the needs of Londoners and businesses.</p> <p>It also calls on London’s businesses, of all sizes and sectors, to outline what they need and what they can contribute to build the workforce of the future.</p>
<p>A vision for a 24-hour city (2017)</p>	<p>This vision sets out the Mayor’s plan to turn London into a leading 24-hour global city, it focuses on building a night-time culture which:</p> <ul style="list-style-type: none"> promotes culture and leisure for all ages and interests increases opening hours ensures safety for residents, visitors and night-time workers works closely with boroughs and the police to create a balanced and sustainable night-time offer <p>These principles have been developed through conversations with businesses, the Night-time Economy Borough Champions, the police and many others.</p> <p>London at night will:</p> <ul style="list-style-type: none"> • Be a global leader.

	<ul style="list-style-type: none"> • Provide vibrant opportunities for all Londoners, regardless of age, disability, gender, gender identity, race, religion, sexual orientation or means. • Promote all forms of cultural, leisure, retail and service activity. • Promote the safety and wellbeing of residents, workers and visitors. • Promote welcoming and accessible nightlife. • Promote and protect investment, activity and entrepreneurship. • Promote domestic and international visits to London. • Be strategically found across London to promote opportunity and minimise impact. • Become a 24-hour city that supports flexible lifestyles. • Take account of future global and domestic trends in leisure, migration, technology, employment and economics.
<p>Environment</p>	
<p>London Environment Strategy (2018)</p>	<p>The strategy sets out the Mayor’s approach to tackling some of the environmental challenges facing London. Toxic air, noise pollution, the threat to green spaces, adverse effect of climate change which all pose a major risk to health and wellbeing of Londoners.</p> <p>This is the first strategy to bring together approaches to every aspect of London’s environment. It is divided into the following areas:</p> <ul style="list-style-type: none"> • Air quality

	<ul style="list-style-type: none"> • Green infrastructure • Climate change mitigation and energy • Waste • Adapting to climate change • Ambient noise
Flood Risk	
Regional Flood Risk Appraisal (2009)	The Mayor published the Regional Flood Risk Appraisal (RFRA) in October 2009. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed. The RFRA has 19 recommendations, involving or lead by a range of organisations. Progress against the recommendations will be monitored annually in the London Plan Annual Monitoring Report.
Mayor of London: Regional Flood Risk Appraisal (2014)	The Regional Flood Risk Appraisal (RFRA) provides an overview of all sources of flooding in London and addresses its probability and consequences.
The Thames Estuary 2100 Plan (2012)	Recommends how to manage tidal flood risk to the end of the century and beyond. The plan sets out how 1.25 million people and £200 billion worth of property will continue to be protected from tidal flood risk.
Thames River Basin Management Plan (2009)	<p>The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) to promote the concept of sustainable water management. The aims of the plan are:</p> <ul style="list-style-type: none"> • To safeguard the sustainable use of water • To protect and restore the status of aquatic ecosystems • To improve aquatic environments by the reduction of hazardous

	<p>substances</p> <ul style="list-style-type: none"> › To reduce groundwater pollution › To help mitigate the effects of flood and droughts
Health	
<p>Better Health for All Londoners: London health inequalities strategy (2018)</p>	<p>The strategy sets out the Mayor's framework to reduce health inequalities in the capital. The strategy has five aims:</p> <p>Healthy children: every child in London child to have a healthy start</p> <p>Healthy minds: for all Londoners to share in a city with the best mental health in the world.</p> <p>Healthy places: for all Londoners to benefit from a society, environment and economy that promotes good mental and physical health.</p> <p>Healthy communities: for London's diverse communities to be healthy and thriving. Communities that are better connected and engaged are more socially integrated. They are also healthier.</p> <p>Healthy habits: to ensure that the healthy choice is the easy choice for all Londoners. The combination of smoking, excessive drinking, physical inactivity and an unhealthy diet is too common in some communities, leading to health problems.</p>
<p>NHS London: Strategic Plan (2008-13)</p> <p>A new 2021 plan is currently being drafted.</p>	<p>A strategic plan that sets out an ambitious programme of work to deliver high-quality, value for money services.</p>
Heritage	

Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment – English Heritage (2010)	The guidance focuses on SEA/SA for development plans, including neighbourhood plans; it is equally applicable to the preparation of SEA/SAs for other types of documents such as Local Transport Plans and Water Resource Management Plans.
Historic England’s Heritage at Risk Register London	Identifies listed buildings at risk from neglect, decay, under use or redundancy in London.
Housing	
Good Quality Homes for All Londoners Guidance Draft 2020)	The draft Good Quality Homes for All Londoners guidance: a suite of documents that provides guidance on ensuring land is used in the best way to deliver the right quantity of new housing, at the right quality, in the right place, embedding high-quality design at the centre of housing delivery.
London Housing Strategy (2018)	<p>The aim of the strategy is to address the housing shortage through an intensive use of London’s available land, focusing on more genuinely affordable housing and providing help now for people feeling the effects of the housing crisis - from private renters to rough sleepers.</p> <p>This Strategy has five key areas:</p> <ul style="list-style-type: none"> • Building more homes for Londoners • Delivering genuinely affordable homes • High quality homes and inclusive neighbourhoods • A fairer deal for private renters and leaseholders • Tackling homelessness and helping rough sleepers
GLA (Greater London Authority) Housing Design Guide	The new ‘interim edition’ of the London Housing Design Guide sets out

(2010)	the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.
Housing Mayor's Supplementary Planning Guidance (2012)	This draft document sets out proposed guidance to supplement the housing policies in the 2011 London Plan (LP). The SPG is informed by the Government's National Planning Policy Framework and by its new Housing Strategy for England.
Affordable Housing and Viability SPG (2017)	The draft SPG provides guidance to ensure that policy is as effective as possible. It does not and cannot introduce new policy. The SPG's main aim is to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. Importantly, it will help embed the requirement for affordable housing into land values and make the viability process more consistent and transparent, as well as speeding up the planning process for those schemes which are delivering more affordable homes. The guidance set out the preferred approach for all schemes of ten units or more.
Housing Standards (2016)	Minor alterations to the London Plan on Housing Quality and Design, Housing Choice, Sustainable Design and Construction, Water Use and Supplies Policy and Lifetime Neighbourhoods Policy

<p>Homes for Londoners: Good Practice Guide to Estate Regeneration (2018)</p>	<p>The guidance is aimed at local authorities and housing associations, covering three key issues:</p> <ul style="list-style-type: none"> Aims and objectives of estate regeneration. Consultation and engagement with residents. A fair deal for tenants and leaseholders. <p>Once adopted, the Guide is intended to reassure Londoners that they will be given real opportunities to shape estate regeneration, that engagement and consultation will be meaningful, and that offers of rehousing and compensation will meet guaranteed standards. The principles set out in this draft of the Guide should be read in conjunction with several other documents that address related issues in estate regeneration projects, covering everything from urban design principles to methods of procurement, as well as with statutory housing and planning policy documents.</p>
<p>Infrastructure</p>	
<p>Social Infrastructure SPG (2015)</p>	<p>This document has guidance to support London Plan Policies on Social Infrastructure as set out in Chapter 5 of the London Plan. It particularly focuses on those elements of social infrastructure that face the biggest strategic challenges - specifically health, education, sport, faith and burials.</p>
<p>Central London Infrastructure Study (2009)</p>	<p>The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. As well as offering local</p>

	authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	The guidance supports the implementation of the London Plan Policy S4 on 'Play and informal recreation.'
London Plan	
London Plan 2021	<p>Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor must produce a spatial development strategy (SDS) – which has become known as 'the London Plan' – and to keep it under review.</p> <p>The London Plan is:</p> <ul style="list-style-type: none"> the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. the document that brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies – including those dealing with: <ul style="list-style-type: none"> Transport Economic Development Housing Culture

	<p>a range of social issues such as children and young people, health inequalities and food</p> <p>a range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste</p> <p>the framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing; and helping to ensure joined up policy delivery by the GLA Group of organisations (including Transport for London)</p> <p>the strategic, London-wide policy context within which boroughs should set their detailed local planning policies.</p> <p>the policy framework for the Mayor’s own decisions on the strategic planning applications referred to the Mayor</p> <p>an essential part of achieving sustainable development, a healthy economy and a more inclusive society in London.</p>
<p>Noise</p>	
<p>London Agglomeration Noise Action Plan (2010)</p>	<p>The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction, if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.</p>
<p>Souder City: The Mayors Ambient Noise Strategy (2004)</p>	<p>The aim of the Mayor’s ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework. Three key issues are: 1. Securing good noise reducing road surfaces 2. Securing a night aircraft</p>

	ban across London 3. Reducing noise through better planning and design of new housing
Open Space, Biodiversity and environment	
London's Natural Signatures: The London Landscape Framework (Natural England 2011)	The London Landscape Framework aims to support but also go beyond existing green space policy. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas.
All London Green Grid March (2012)	<p>The All London Green Grid takes the principles of the East London Green Grid and applies them across London.</p> <p>The concept of a "green grid" – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan's approach to the provision, enhancement and management of green infrastructure (Policy 2.18). This network of spaces functions best when designed and managed as an interdependent 'grid.'</p> <p>The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations and the economic and social uplift these supports.</p>
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)	The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a

	quality natural space. The strategy is a key step in establishing a London-wide framework for supporting London's diversity of wildlife.
Public London Charter (draft 2020)	The Public London Charter sets out principles for the management and maintenance of public space to help ensure new public spaces are inclusive places, offering the highest level of public access and ensuring any rules or restrictions are only those that are essential for the safe management of the space.
Transport	
Mayors Transport Strategy (2018)	<p>The document sets out the Mayor's policies and proposals to reshape transport in London over the next two decades.</p> <p>Three key themes are at the heart of the strategy.</p> <p>Healthy Streets and healthy people: Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <p>A good public transport experience: Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <p>New homes and jobs: Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p>
Mayors Transport Strategy (2010)	The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework to support and shape the economic and

	social development of London over the next 20 years. It sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision.
Transport for London: Transport Assessment Best Practice Guidance (2010)	<p>The purpose of this document is to provide prominent level guidance to improve the process for TfL and its Land Use Planning Team (LUP) and it does not replace borough guidance on transport assessments.</p> <p>The guidance is relevant to developments that are deemed to be strategically important, and which are referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.</p>
Water	
Securing London's Water Future (2011)	<p>This is the first water strategy for London and provides a complete picture of the capital's water needs. The strategy calls for organisations involved in the city's water management to:</p> <ul style="list-style-type: none"> invest in a water management and sewerage system to ensure London has the water services fit for a world class city and create jobs. support and encourage Londoners to take practical action to save water, save energy and save on their utility bills (a standard package of water saving measures can save a household around 35,000 litres of water per year and £90 off their bills) realise the potential of London's sewage as a clean energy resource to help reduce greenhouse gas emissions and improve energy security. work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces.

	At the heart of the strategy is a six-point plan to reduce London's water demand. At a time of decreasing supply and increasing demand for water, it makes sense to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water expenditure to balance supply and demand for water, safeguard the environment and help tackle water affordability problems.
Taking Care of Water: Our Plan for the next 25 years (Thames Water Utilities 2007)	Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the impact on bills.
Water Resources Management Plan (Thames Water Utilities 2010-2035)	Sets out how demand for water is balanced against the supply over the next 25-year period.
Our Plans for Water (Thames Water Utilities 2010-2015)	A five-year Plan, which sets out proposals to maintain and improve services during the period 2010 to 2015.
Merton's Plans and strategies	
Community	
Merton's Sustainable Community Strategy	
Merton's Cultural Strategy - A Better Future for All 2007-10	
Economy	

Employment Land Study 2010
Merton's Economic Development Strategy 2010 and Refresh 2012
Merton's Employment and Skills Action Plan 2013-14
Energy and Climate Change
Climate Change Strategy and Action Plan (2021)
Climate Change Strategy 2014- 2017
Carbon Assessment of Domestic Housing in London Borough of Merton 2010
Merton Climate Change Research: Town Centre Morden: CHP (Combined Heat and Power) Plant Option Appraisal 2010
Merton Climate Change: Renewable Energy Resources in Merton - A Preliminary Assessment 2009
Environment
Nature Reserve Management Plans (13 in total) 1997-2007
Thames Landscape Strategy 2012
Flood Risk
Strategic Flood Risk Assessment Level 1 (2020) and level 2 (pending 2020/21) – joint with London Borough of Wandsworth
(Joint) Strategic Flood Risk Assessment (Level 1 and 2) (2015 and 2017) (London Boroughs of Wandsworth, Merton, Sutton and Croydon)
Local Flood Risk Management Strategy 2014
Preliminary flood Risk Assessment 2011

Health
Annual Public Health Report 2018
Joint Strategic Needs Assessment year tbc
The Health Needs Assessment: East Merton 2014
Pharmaceutical Needs Assessment 2019
Childhood Obesity Action Plan 2017
Food Poverty Plan 2018
Merton CCG (Clinical Commissioning Groups) Dementia Strategy (TBC) - (Five-year period) tbc
Health in All Policies (HiAP) (emerging)
Autism Strategy (emerging 2021)
Dementia Strategy (emerging 2021)
Heritage and Archaeology
Merton's Conservation Area Character Assessments
Borough Character Study (emerging 2021)
Housing
Affordable Housing Viability Study 2020
Housing Strategy 2012 -15

Housing Strategy (emerging 2021)
Tenancy Strategy 2013
Merton's Older Person Housing Strategy 2008-12
Merton's Neighbourhood Renewal Strategy 2005-10
Strategic Housing Market Assessment 2019
Housing Market Assessment for the Estate Regeneration Areas, February 2017
Viability for the Estate Regeneration Areas, March 2017
Infrastructure
Infrastructure Projects (table 27.2 Core Planning Strategy)
Infrastructure Needs Assessment Study 2008
Infrastructure Delivery Plan (pending 2020).
Merton's Indoor Sports Facility Study 2020
Merton's Playing Pitch Strategy 2019
Green Infrastructure, Open Space and Biodiversity
Merton's Green Infrastructure, Biodiversity and Open Space Study 2020
Merton's Public Realm Strategy 2009
Merton's Allotment Strategy 2007-10

Borough's Sport, Open Space and Recreation Needs Assessment
Merton's Free Play Strategy 2007-2012
Wandle Valley Regional Park: A vision for the future update 2009
Planning
Core Planning Strategy 2011
Sites and Policies Plan 2014
Policies Map 2014
Pollution
Air Quality Action Plan 2018
Contaminated Land Strategy 2005
Transport
Local Implementation Plan for Transport 2011-2031
Waste
Draft South London Waste Plan 2020
South London Waste Plan 2012

Key findings from the review of plans analysis

2.2 All the plans and programmes listed above will influence Merton's new Local Plan to some degree. As a London borough, as major influence will be the London Plan, as the spatial strategy for London and its supporting documents. In addition, the Mayoral strategies, local adopted plans/strategies and evidence-based studies. The objectives contained within these documents will provide the direction for Merton Local Plan.

2.3 There is a clear hierarchy of plans and programmes in certain areas descending from the international/European and/or national level through to the local level. The implications for a Local Plan generally, tend to become more specific and precise at the local level and regional level. Several issues are highlighted in the analysis of the plans and programmes as detailed in this report. It will be important the Local Plan to reflect this context and to incorporate the requirements of other plans and programmes as appropriate and for the Sustainability Appraisal to consider the sustainability implications during the appraisal process. The key findings from reviewing plans are set out below:

- Air quality: the urgent need to meet mandatory standards for air quality and cut the annual number of premature deaths from air pollution.
- Climate Change: the need to design buildings and spaces to adapt and mitigate the effects of climate change, including overheating, flooding, droughts and more extreme weather events and achieving zero net carbon emissions by 2050.
- Energy Use and Supply: Widening supply and demand gap. Greater efficiencies, use of renewable energy sources, and the importance of low carbon economy.
- Water resources and quality: identified need to focus on the protection, improvements and sustainable use of the water environment.
- Flood Risk: a need to ensure that development is designed in a way that does not increase flood risk, to encourage the use of Sustainable Drainage Systems (SUDS) and that all elements of policy require review to ensure that flood risk is integrated with the management of the rest of London's Environment.
- Natural Environment: facilitating opportunities to integrate biodiversity and the network of green spaces to provide a range of sustainability benefits, i.e. healthy living, improving air, noise and water quality, cooling the urban environment, enhancing biodiversity and ecological resilience. Enhancing existing habitats and providing new areas for biodiversity as opportunities arise.
- Historic Environment: the importance of the social, cultural and economic benefits of the historic environment and the importance of conserving and enhancing designated and non-designated heritage assets and their settings.

- Geology and Soils: a need to focus on prevention and remediation of environmental damage, including land contamination. The need to increase efforts to reduce soil degradation and remediate contaminated sites.
- Materials and Waste: need to apply principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling in all construction.
- Noise and Vibration: a need to minimise noise and vibration levels and the number of people exposed to high levels of noise from development, activities and use.
- Sustainable Land Use: the need to ensure the most efficient use of land which are in keeping with principles of sustainable development.
- Demography: Merton's predicted population growth and increasing aging population.
- Equality and Social Integration: reducing inequalities and the promotion of inclusion and participation opportunities for those groups with protected characteristics to promote social integration and cohesion.
- Health and Health Inequalities: a need to improve the overall health and healthy life expectancy of Merton's residents.
- Housing: to significantly increase the delivery of housing, including a mix of size, tenures, choice and the delivery genuine affordable housing. In addition, the complexity of issues around barriers to housing delivery
- Crime, safety and security: the design of the built environment and the mix of activities can significantly impact on fear and actual crime.
- Connectivity: integration of land use and transport planning to ensure growth is sustainable and optimises connectivity throughout London. The green network also provides connections which has many health and environmental benefits.
- Accessibility: the need for people to be able to easily and independently access jobs, housing, public spaces, education, public transport, healthcare and amenities and be able to easily and independently move around the built environment.
- Employment, training and skills: employment growth in different sectors ensuring a diverse economy providing opportunities for all.
- Culture: the economic and social benefits of culture.
- Townscape, Landscape and Public Realm: the importance of creating and maintaining a safe, attractive and well-designed public realm which encourages people to walk and cycle, promoting a sense of place and reducing the need to travel to access services and amenities.

Sustainable Development

7.4

The UK Sustainable Development Strategy (ODPM5, 2005) defines sustainable development as “enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations”. The Strategy is based on the following guiding principles:

- 1) **Living within Environmental Limits** Respecting the limits of the planet’s environment, resources and biodiversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.
- 2) **Ensuring a Strong, Healthy and Just Society** Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion and creating equal opportunity for all.
- 3) **Achieving a Sustainable Economy** Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them, and efficient resource use is incentivised.
- 4) **Using Sound Science Responsibly** Ensuring policy is developed and implemented based on strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.
- 5) **Promoting Good Governance** Actively promoting effective, participative systems of governance in all levels of society, engaging people’s creativity, energy and diversity.

7.5

In looking to regulate the development and use of land in the public interest, planning is key to achieving sustainable development by promoting environmental, economic and social objectives together over time. The revised National Planning Policy Framework (NPPF) (MHCLG (Ministry for Housing Communities and Local Government), February 2019) defines the purpose of planning as follows:

- **Economic:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **Social:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.
- **Environmental:** to contribute to protecting and enhancing our natural, built and historic environment; including

making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Strategic policies

2.6 The National Planning Policy Framework (NPPF) 2018, states that strategic policies are required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide:

- a) an overall strategy for the pattern and scale of development.
- b) the homes and workplaces needed, including affordable housing.
- c) appropriate retail, leisure and other commercial development.
- d) infrastructure for transport, telecommunications, security, waste management,
- e) water supply, wastewater, flood risk and coastal change management, and the
- f) provision of minerals and energy (including heat).
- g) community facilities (such as health, education and cultural infrastructure); and
- h) climate change mitigation and adaptation, and conservation and enhancement
- i) of the natural, built and historic environment, including landscape and green infrastructure.

2.7 It further states that:

Plans should make explicit which policies are 'strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any local policies that may be needed.

3 Appraisal method

3.1 The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new Local Plan is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended. Several guidance documents have been issued in relation to SA/SEA and the methodologies outlined in these have been used where still applicable:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister (November 2005)
- Practical Guide to the SEA Directive, Office of the Deputy Prime Minister (September 2005).
- Sustainability Appraisal Planning Policy Manual, Planning Advisory Service (2009); and
- Sustainability Appraisal: advice note, Planning Advisory Service (2010).

Figure x: SA scoring matrix

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
0	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
--	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

Figure x: SA objectives

Sustainability objectives		SEA Topic requirements
SO1	Air quality: To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	Air Human Health Population
SO2	Biodiversity: To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Biodiversity Flora Fauna
SO3	Land and soil condition and pollutants: To conserve Merton's geodiversity and protect soils from development and over intensive use.	Soil Landscape Human Health Biodiversity Flora Fauna
SO4	Sustainable land use: To make the best and most efficient use of land to support sustainable patterns and forms of development.	Landscape
SO5	Heritage (including architectural and archaeological heritage): To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Cultural heritage, including architectural and archaeological heritage.
SO6	Flood risk management: To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Water Climate Factors Human health
SO7	Climate change: To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Climate Factors Material assets
SO8	Noise and vibration: To minimise noise, vibration levels and disruption to people and communities.	Human Health
SO9	Water quality: To protect and enhance Merton's water bodies.	Water Human Health Flora Fauna
SO10	Water consumption: Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Water Human

SO11	Open space and nature: To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	Biodiversity Flora Fauna Climate Factors Soil Landscape
SO12	Sustainable transport: To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	Population
SO13	Energy use: To improve energy efficiency in new developments and increase renewable energy supply / provision.	Climate Factors Material Assets
SO14	Health and wellbeing: To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Human Health Population
SO15	Housing: To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.	Human Health Population Material Assets
SO16	Safe environments: To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Human Health Population
SO17	Population demand and growth: To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.	Human Health Population Material Assets
SO18	Social inclusion and cohesion: To ensure Merton has socially integrated communities which are strong, resilient and inclusive.	Human Health Population
SO19	Design: To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	Human Health Population Air Climate Factors Landscape
SO20	Local employment: To develop and maintain a healthy labour market.	Human Health Population Material assets
SO21	Education and skills: To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people	Population Human Health

	with disabilities and Black Asian and Minority Ethnic groups.	Material assets
SO22	<p>Economic growth: To increase the vitality and viability of existing town centres, local centres and parades To ensure that there is a mixed of business spaces including, affordable spaces in Merton.</p>	Population Human Health Material assets

4 Appraisal of planning policies

4.1 This section sets out the ‘likely significant effects’, both positive and negative, identified in the appraisal of the objectives, policies and reasonable alternatives. There have been some minor changes to the draft Plan since the last consultation. The change provide clarity and/or changed to be more succinct wording (or ‘plain English’). Other changes have been influenced by findings and recommendations of evidence studies/reports carried out in accordance with guidelines and/or statutory requirements. These changes do not change direction of the policy and are more importantly, in line with national and regional planning policies. For summary of changes can be found in [Appendix x](#).

4.2 Government guidance on Sustainability Appraisals states that:

‘The sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects. Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work.’

4.3 The SEA Directive states:

‘An environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated’ (Article 5(1)).

- 4.4 The Local Plan contains development policies, which will be used in the determining planning applications in Merton. An assessment of the Plan policies has been carried out against the SA (Sustainability Appraisal) framework. As a requirement of the NPPF, the Local Plan has strategic policies, which are explicitly identified in the Local Plan in line with the NPPF. The NPPF, states further that these should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Additionally, strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 4.5 Strategic policies are required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide:
- j) an overall strategy for the pattern and scale of development.
 - k) the homes and workplaces needed, including affordable housing.
 - l) appropriate retail, leisure and other commercial development.
 - m) infrastructure for transport, telecommunications, security, waste management,
 - n) water supply, wastewater, flood risk and coastal change management, and the
 - o) provision of minerals and energy (including heat).
 - p) community facilities (such as health, education and cultural infrastructure); and
 - q) climate change mitigation and adaptation, and conservation and enhancement
 - r) of the natural, built and historic environment, including landscape and green infrastructure.

Figure x: Health and wellbeing policies

Policy	Sustainability objectives																				The effect of the policy				
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium/long term	
Strategic policy HW2.1 Health (including mental health) and Wellbeing.	+						+				+	+	+	++	+	+	+	+	+	+	+	+	+	Permanent	long
Policy HW2.2: Delivering healthy places.	+			+			+	+			+	+	+	++	+	++	+	+	+	+	+	+	+	Permanent	long

Appraisal comments:

4.6 The two health and wellbeing policies seek to improve the health (including mental health) and wellbeing of Merton’s residents. The strategic policy *HW2.1 Health (including mental health) and Wellbeing*. Clearly, sets out the health priorities and approaches to be taken to improve health inequalities in partnership with key bodies. Policy HW2.2: *Delivering healthy places* sets out the role that development proposals will play in improve health and wellbeing, for example in areas of deprivation, it sets out the management and monitoring of fast-food establishments proposal in Merton especially those near schools.

- 4.7 The health and wellbeing policies would support individual access to healthier choices and places. It promotes a number of design approaches that encourages health and greener environments such as Healthy Streets Approach, dementia friendly design and 20 Minutes Neighbourhoods. The policies enables more physical activity, by facilitating active sustainable forms of transport like walking and cycling. All contributing to improved physical and mental health and wellbeing. The policies drive improvements to health, indirectly, will improve economic prosperity and improve income inequalities, Furthermore, in the wider context reduce the financial burden and pressure on the National Health Service (NHS); plus, associated costs from loss of productivity the UK economy.
- 4.8 Healthy streets, 20 Minutes Neighbourhoods and other approaches mentioned in the policies can promote an attractive environment, which encourages a sense of place. Accessibility and connectivity would be positively affected by the policies, particularly through the Healthy Street Approach which promotes high quality walking infrastructure, increasing access to the wider public transport network whilst facilitating more active modes of transport. The policies will have positive effects on air quality and climate change through the promotion of Healthy Streets to reduce private vehicle use and promote active travel. The policies perfume well against a number SA Objective including social objectives.

Figure x: Housing policies

Policy	Sustainability Objectives																				The effect of the policy				
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /Long term	
Strategic Policy H4.1: Housing Choice				+										+	+	+	+	+	+	+	+	+	+	Permanent	Long
Strategic Policy H4.2: Housing Provision				+								+	+	+	+	+	+	+	+	+	+	+	+	Permanent	Long
Policy 4.3 Housing Mix				+									+	+	+	+	+	+						Permanent	Long
Policy H4.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.	+		+	+								+	+	+	+	+	+	+						Permanent	long
Policy H4.5 Student	+			+								+	+	+	+	+	+	+	+	+	+	+	+	Permanent	Long

- 4.12 New homes are required to conform to high design standards, and therefore the policies would help to reduce potential health risks such as damp, mould and cold. New homes tend to be more energy efficient and therefore issues such as fuel poverty would be reduced. The policies would also help facilitate regeneration in the local area, delivering important physical and social infrastructure.
- 4.13 All the housing policies support improving health (including mental health) and wellbeing, contribute to the local economic growth, education and skills and local employment. It is expected that the policy would have positive impacts on sustainable land-use, by helping to ensure that high densities do not result in adverse impacts for diverse groups of people. The housing policies perform well against social and economic SA Objectives.

Figure x: Neighbourhood policies (sub areas)

Policy	Policy aim	Sustainability Objectives.																				The effect of the policy			
		S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term
Colliers Wood Page 718	To designate Colliers Wood as a District Centre and provide policy and site allocations appropriate to its setting.	+	+		+	+	++	+				+	++	?	++	+	+	+	+		+		++	Permanent	Long
Mitcham	To support development in Mitcham that enhances jobs and services for local people, is well designed and provides homes on upper floors.																							Permanent	Long

Morden	The delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes intensification and comprehensive development within the Morden Regeneration Zone.	+		?	++	+		+			-	++	++	+	++	++	+	++	+	+	+	++	Permanent	Long	
Raynes Park	To support development in Raynes Park and surrounds commensurate with its character and setting.	+			+	+	++		+			+	+	?	+	+	+	+	+	?	+	+	++	Permanent	Long
Wimbledon	To support Wimbledon, thrive as the borough's major centre.	+	+		+	+	+		+			+	++	?	++	+	+	+	+	+	+	+	++	Permanent	Long

South Wimbledon	To create a new local town centre at South Wimbledon	+			+			?	+			+	+	?	+	+	+	+	+	+	+	+		+	Permanent	Long
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Assessment comments.

Figure x: Green infrastructure policies

Policy	Sustainability Objectives																				The effect of the policy			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /long term
Strategic Policy O8.1 Open Space, Green Infrastructure and Nature Conservation																							Permanent	Long
Policy O8.2 Open Space and Green Infrastructure																							Permanent	long
Policy O8.3 Biodiversity and Access to Nature																							Permanent	long
Policy																							Permanent	Long

wider access to biodiversity in Merton.

4.16 Policy O8.5 *Urban Greening* ensures that new developments incorporate urban greening, green infrastructure which will improve across the borough and help to mitigate the impacts of climate change such as overheating, flooding and contribute reducing urban island effect. Similarly, green measures such as green walls and planting of trees (Policy O8.4 *Protection of Trees*) can absorb noise and vibrations, thereby reducing local noise levels, reduce flood incidents, improve water quality and improve soil quality. Where green infrastructure measures include harvesting and redirecting storm water, and/or using green roofs, overflow would also be controlled, helping to reduce discharges to surface and ground waters. The Green Infrastructure polices perform will against a number of SA Objectives.

Figure x: Blue infrastructure polices.

Policy	Sustainability Objectives																						The effect of the policy		
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /Long term	
Strategic Policy F13.8 Flood Risk Management and Sustainable Drainage	Light Green	Light Green	Light Green	Light Green	White	Dark Green	Light Green	White	Light Green	White	Light Green	White	White	Light Green	Light Green	White	White	White	Light Green	White	White	White	Light Green	Permanent	Long
Policy F13.9 Managing	Light Green	Light Green	Light Green	Light Green	White	Dark Green	Light Green	Light Green	Dark Green	Light Green	Light Green	White	White	Light Green	Light Green	Light Green	White	Light Green	Light Green	White	White	Light Green	Permanent	Long	

Figure x: Air quality and pollutants policies

Policy	Sustainability Objectives																				The effect of the policy				
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /long term	
Policy P13.11 Improving Air Quality and Minimising Pollution	++	+		+		+	+	++	++		+			++	+				+					Permanent	Long

Appraisal assessment.

4.19 Poor air quality is not evenly distributed across Merton, and more vulnerable communities are often disproportionately affected by air quality impacts. Improvements to air quality would therefore help to improve the health of the population, particularly vulnerable groups such as young children, elderly people and those with respiratory conditions. Improvements to health would also facilitate wider economic benefits by reducing healthcare costs associated with treating respiratory conditions and premature deaths. Improvements to air quality would help to alleviate the impacts of climate change and the heat island effect. The policy supports the environmental and social sustainability objectives. The policy performs well against a number of SA Objectives and very strongly against the environmental SA Objectives.

Figure x: Climate change policies

Policy	Sustainability Objectives																				The effect of the policy				
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /long term	
Strategic Policy CC8.10 Promoting Sustainable Design to Mitigate and Adapt to Climate Change	Light Green	Light Green	Light Green			Light Green	Dark Green				Light Green		Dark Green	Light Green		Light Green			Light Green				Light Green	permanent	Long
Policy CC8.11 Minimising greenhouse gas emissions).	Light Green	Light Green	Light Green				Dark Green					Light Green	Dark Green	Light Green		Light Green			Light Green				Light Green	Permanent	Long
Policy CC8.12 Minimising energy use	Light Green	Light Green	Light Green			Light Green	Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long
Policy CC8.13 Low carbon energy	Light Green	Light Green					Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long
Policy CC8.14 Minimising waste and promoting a circular economy.	Light Green	Light Green	Light Green			Light Green	Dark Green						Dark Green						Light Green	Light Green	Light Green	Light Green	Light Green	Permanent	Long
Policy CC8.15 Sustainable Design Standards	Light Green					Light Green	Dark Green						Dark Green	Light Green	Light Green				Light Green				Light Green	Permanent	Long

Appraisal comments

- 4.20 Policy CC8.12 Minimising energy use, Policy CC8.15 Sustainable Design Standards and CC8.13 Low carbon energy policies; would facilitate the development of energy efficient buildings. Increased energy efficiency of new homes, and retrospective improvements of existing homes, would help to reduce fuel cost and the risk of fuel poverty by making homes cheaper to run. More efficient developments would therefore contribute to improvements in local air quality and contribute to climate change mitigation and adaptation.
- 4.21 The policy supports the adoption of less polluting energy techniques, promoting low carbon and renewable energy sources. This policy outlines the need to identify and establish future energy needs in opportunity areas, town centres and other significant developments to build resilience and ensure capacity is managed. Energy masterplans offer a number of benefits, ensuring opportunities for energy efficiency in new developments are identified at the first stages.
- 4.22 Policy CC8.14 Minimising waste and promoting a circular economy the policy encourages a reduction in waste generation and maximises re-use. This reduction would result in less vehicles required to transport raw materials and waste, which would positively impact local air quality by reducing associated carbon emissions and reduce local noise disturbance associated with transport and waste processing.
- 4.23 The policies perform strongly against a number environmental SA objective as well social SA objectives.

Figure x: Economy polices.

Policy	Sustainability Objectives																				The effect of the policy			
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /long term
Policy Ec7.1: Promoting economic growth and successful high streets (formerly Economic Development)	Light Green	Light Green		Light Green			Light Green				Light Green	Light Green		Light Green		Light Green	Light Green			Dark Green	Light Green	Dark Green	Permanent	Long
Policy Ec 7.2: Business locations in Merton (Formerly Employment areas in Merton)	Light Green			Dark Green								Light Green		Light Green		Light Green	Light Green			Dark Green	Light Green	Dark Green	Permanent	Long
Policy EC.7.3 Protection of scattered employment sites	Light Green			Dark Green				Light Green						Light Green		Light Green	Light Green			Dark Green	Light Green	Dark Green	Permanent	Medium/Long
Policy EC.4 Local Employment Opportunities				Dark Green										Light Green		Light Green	Light Green			Dark Green	Dark Green	Dark Green	Permanent	Long

Figure x: Infrastructure policies

Policy	Sustainability Objectives																						The effect of the policy	
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	SO17	SO18	SO19	SO20	SO21	SO22	Temporary /Permanent	Short/medium /long term
Strategic policy IN6.1 Supporting Infrastructure							Light Green				Light Green	Dark Green	Light Green			Light Green	Light Green	Light Green	Permanent	Long				
Policy IN6.2 Social and Community Infrastructure							Light Green						Dark Green		Light Green	Light Green	Light Green				Dark Green		Permanent	Medium/long
Policy IN6.3 Sport and Recreation	Light Green	Light Green	Light Green				Light Green				Light Green		Dark Green		Light Green	Light Green	Light Green				Light Green		Permanent	Medium/long
Strategic Policy W6.4 Waste Management	Light Green	Light Green	Light Green				Light Green						Light Green		Light Green	Light Green				Light Green		Light Green	Permanent	Medium/long

Appraisal comments

- 4.25 The infrastructure policies would ensure that developments have a positive impact for residents by supporting the needs of the local community. The sharing of community facilities would ensure local groups, who often have small budgets, have affordable and appropriate space for their needs. The provision of educational facilities would ensure sufficient school places are provided for local children. This would reduce the need for young people to travel long distances to school, which can be a stressful and expensive experience. It would equally contribute to wider air quality improvements by reducing vehicle use.
- 4.26 Strategic policy IN6.1 Supporting Infrastructure and Policy IN6.2 Social and Community Infrastructure would support the provision of accessible healthcare facilities benefits those with mobility issues and/or long-term health conditions. Increasing the capacity of health care facilities and considering closely where demand is, and what types of services are needed, would ensure these services are of a high quality and meet the needs of their patients. Furthermore, the policy would ensure the improvement and management of all types of education facilities from nursery schools to further education, which are accessible and affordable. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, residents with a disability or existing health conditions. The policy strongly encourages developer to engage and council partnership working with providers such as health service and education departments. partners to ensure the right provision is delivered.
- 4.27 Strategic policy IN6.1 Supporting Infrastructure and Policy IN6.2 Social and Community Infrastructure support equal provision of play spaces, seek to increase provision in area of need and would also have a highly positive effect to help reduce the health problems of deprived areas.
- 4.28 Policy IN6.3 Sport and Recreation supports the provision and enhancement of sports and recreational facilities in Merton and would contribute significantly to wider health improvements by promoting increased physical activities. The policy would support the delivery of a wide range of sports and activities to suits the interests and lifestyles of residents. Inequalities around access to these services would also be addressed through the application of Sport England Standards, to provide equality and reduce health problems in deprived areas. Active lifestyles will have a profound positive effect on life expectancy and can provide contribute to improved mental health and wellbeing.

Ensuring sporting facilities are appropriately connected to pedestrian and cycling networks would encourage people to continue physical activity outside of a formal setting and reduce traffic congestion. This would offer benefits to the wider community, not just users of these facilities. The policy also identifies the need to manage lighting appropriately to ensure there is no harm on the local community and biodiversity. The use of playing fields could also provide larger, green spaces across the city, increasing natural capital and greenery across London. However, any biodiversity would need to be protected in these areas and a balance assured between recreational use and wildlife.

4.29 The infrastructure policies perform well against a number of social and environmental objectives.

Figure x: Design policies

Policy	Sustainability Objectives																						The effect of the policy	
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S010	S011	S012	S013	S014	S015	S016	S017	S018	S019	S020	S021	S022	Temporary /Permanent	Short/medium /long term
Strategic Policy LP D5.1 Delivering well designed and resilient neighbourhoods	Green	Green	Green	White	Green	Green	Green	Green	Green	White	Green	Dark Green	White	White	Green	Permanent	Long							
Policy D5.2 Urban design	Green	Green	Green	White	White	Green	Green	White	White	White	Green	Dark Green	White	Green	Green	Permanent	Medium/long							

Policy D5.3 Ensuring high quality design for all developments																						Permanent	Medium/long	
Policy D5.4 Alterations and extensions to existing buildings																							Permanent	Medium/long
Policy D5.5 Managing heritage assets.																							Permanent	Long
Policy D5.6 Tall buildings																							Permanent	Long
Policy D5.7 Advertisements																							Permanent	Long
Policy D5.8 Digital infrastructure																							Permanent	Long
Policy D5.9 Shop front design and signage																							Permanent	Long
Policy D5.10 Dwelling Conversions																							Permanent	Long

Appraisal comments

4.30 Developments in the borough are required to meet the highest standards of design, function and construction and help contribute to a net-zero carbon and climate-resilient future. The design policies seek to ensure that development proposals respect and positively respond to their context, townscape, landscape and public realm to strengthen Merton’s character. Successful neighbourhoods are much more than just buildings. Historic environments, mature vegetation and existing communities all contribute to successful places, and as such must be considered when designing. Delivering sustainable neighbourhoods is as important as delivering the homes themselves. Policy D5.3 Ensuring high quality design for all developments seek to ensure that all development no matter what type consider the impact on the environment and how people experience the development and how the development responds to its context. With Policy D5.5 Managing heritage assets places an importance on Merton heritage assets and recognises the historical significance

4.31 Policy D5.2 Urban design acknowledges that well-designed places create a keen sense of community and improve the social and emotional wellbeing of those who use it and ensure local resilience to the impacts of climate change such as flooding (from all sources), overheating and subsidence. The policy drives for the creation of inclusive, sustainable, efficient and high quality design and layout of the urban and suburban environment found in Merton.

. The design policies perform well across the sustainability objectives.

Figure x: Sustainable Transport

Policy	Sustainability Objectives																			The effect of the		
	S01	S02	S03	S04	S05	S06	S07	S08	S09	S01	S01	S01	S01	S01	S01	S01	S01	S02	S02	S02	Temporary /Permanent	Short/medium /long term
Strategic Policy T6.4 Sustainable Travel	Light Green	Light Green	Light Green	Light Green	White	White	Light Green	White	White	White	White	Dark Green	White	Light Green	Light Green	White	Light Green	Light Green	White	Light Green	Permanent	Long

economic inequalities. Improving environmental conditions and air quality is particularly important for higher risk groups such as residents with existing respiratory conditions, young children, older people and pregnant women. T6.5 Prioritising active travel choices policy would also increase access to wider environmental infrastructure which could also provide positive economic benefits by supporting housing growth and access to opportunities such as employment and education.

- 4.34 Policy T6.7 Managing the Transport Impacts of Development policy will assess and mitigate transport impacts for new developments would have positive effects on sustainable land use, as it promotes the use of existing transport networks, both close to the development. The policy also supports the delivery of goods and services through more efficient and sustainable freight movement. This ensures businesses receive the goods and services they require to prosper, thus enhancing economic productivity in the long term. Freight services indirectly support a range of supply chains and business networks that underpin Merton's economic activity and employment, therefore having a positive effect on the borough's economic growth. Delivery services also provide employment for workers across different skills, and this policy could therefore protect and facilitate jobs and growth in this sector.
- 4.35 Incorporating the Healthy Street Approach in the sustainable transport policies would bring more benefits that meet a number of SA objectives – environmental and social.

5 Appraisal of the site allocations and Policies Map

- 5.1 The Site Allocations and Policy Map will help to deliver the borough's spatial vision and strategy objectives. They are intended to have a positive impact across all communities. They can:
- help provide and protect employment land to provide jobs in the borough
 - provide community facilities and infrastructure for local communities, for example through the incorporation of open space, play facilities, health facilities and other essential service for neighbourhoods and areas
 - help reduce the need to travel by car by encouraging sustainable transport
 - create healthy and safe environments such as provide well designed mix of housing (including affordable and supported housing) to meet local needs and Merton's growing and aging population
 - promote active living for Merton's diverse communities

5.2 It is important to note that site allocations comprise one part of the policy framework. Whilst, they will set out appropriate uses for a site and considerations; site allocations will not normally deal with the detail precise requirements (e.g. the number of homes, or the number of storeys that will be built or the design and form of the building) and its relationship and/or impact to the environment including the historic environment. These matters are detailed by the planning application stage. Other planning policy documents will be used in determining planning applications such as, the London Plan, NPPF and South London Waste Plan; all of which have been subject to an SA/SEA and of course the new Local Plan policies once adopted, while play its part.

Figure x: Colliers Wood site allocations assessed against the SA Objectives.

Colliers Wood neighbourhood site allocations					
Site allocations	CW1: Baltic Close	CW2: Car Park South of Britannia Point	CW3: Colliers Wood Community Centre	CW4: Colliers Wood Station	CW5: Priory Retail Park
Site allocation use	Residential and commercial mixed-use scheme	Delivery of new homes as part of a mixed-use development. Residential on upper floors with any of the following on the ground floor (financial and professional services, food and drink, office, assembly, health/day centre) or other sui generis use that is a suitable mix right for a town centre.	Mixed-use community and residential.	Any of the following or a suitable mix of retail, financial and professional restaurant or café, hot food takeaway, drinking establishment, leisure/health centre, offices and residential on upper floors. The Post Office should be retained.	a suitable mix of town centre uses on the ground and lower floors (shops financial and professional services, food and drink, office, assembly, health/day centre or other sui generis use appropriate for a town centre), residential on upper floors and public space.

S01					
S02					
S03					
S04					
S05					
S06					
S07					
S08					
S09					
S010					
S011					
S012					
S013					
S014					
S015					
S016					
S017					
S018					
S019					
S020					
S021					
S022					

Figure x: Mitcham site allocations assessed against the SA Objectives (site allocations Mi1-Mi5).

Mitcham neighbourhood site allocations					
Site ref:	Mi1: Benedict Wharf	Mi2: Birches Close	Mi3: Burn Bullock and Mitcham Cricket Pavilion	Mi4: Elm Nursery Car Park	Mi5: Land at Canons
Site allocation	Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable. Reallocation is dependent on there being no loss of waste management capacity within the South London Waste Plan area.	Healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in Mitcham.	Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green. Use of the Burn Bullock building as non-residential uses with public access on the ground floor which could include business, service or community uses. Residential development may be acceptable on upper floors as enabling development. Residential development on the car park to the rear of the site to enable community ownership and management of Mitcham Cricket Pavilion associated land and buildings.	Residential	Residential
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					?
SO8					

SO9					
SO10					
SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure x: Mitcham site allocations assessed against the SA Objectives (site allocations Mi6-Mi10)

Mitcham neighbourhood site allocations

Site ref:	Mi6: 326 and 328 London Road	Mi7: 370 London Road	Mi8: 1 to 12 Majestic Way	Mi9: Former Mitcham Fire Station	Mi10: Mitcham Library
Site allocation	Residential if, the office and community functions are provided elsewhere locally. Residential use would be dependent on the office and community use being re-provided locally.	Mixed used non-residential (shops, services, offices, community on the ground floor and residential on upper floors.	Mixed use: retail, businesses, food and drink and community services (health centres, crèches, day nurseries, day centre on the ground floors, residential on upper floors.	A mix of uses which could include any of the following: community uses (Clinics, health centres, crèches, day nurseries, day centre), other community uses such as a cinema, gallery, theatre; residential, restaurant/café, office, drinking establishment or non-food retail.	Library to be kept and improved (either on site or closer to Mitcham town centre). The rest of the site considered for a suitable mix or any of community uses, office or residential.
SA Objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					

SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure x: Mitcham site allocations assessed against the SA Objectives (site allocations Mi11-Mi15)

Mitcham neighbourhood site allocations					
Site ref:	Mi11: Raleigh Gardens car park	Mi12: Sibthorpe Road Car Park	Mi13: 30 St Mark's Road	Mi14: United Westminster Schools site	Mi15 Taylor Road Day Centre
Site allocation	Residential	Town centre type uses including retail, food and drink, offices, works spaces, leisure, community services and residential on upper floors.	Residential.	publicly accessible sporting facilities enabled by residential development.	Mixed use community (Clinics, health centres, crèches, day nurseries, day centre) and residential or solely residential if the community service is provided elsewhere.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					

SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure x: Mitcham site allocations assessed against the SA Objectives (site allocations Mi11-Mi15)

Mitcham neighbourhood site allocations				
Site ref:	Mi16: Mitcham Gasworks Western Road	Mi17: White Hart Pub and back land London Road	Mi18: Wilson Hospital	Mi19 Worsfold House Church Road
Site allocation:	Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre).	Restaurant /cafe or public house or drinking establishment with associated car park with potential for residential development to enable the restoration and viable function of the White Hart.	Healthcare with community and enabling residential development. or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham.	A suitable mix of school and/or residential.
SA objective				
SO1				
SO2				
SO3				
SO4				
SO5				
SO6				
SO7				
SO8				

SO9				
SO10				
SO11				
SO12				
SO13				
SO14				
SO15				
SO16				
SO17				
SO18				
SO19				
SO20				
SO21				
SO22				

Figure x: Morden site allocations assessed against the SA Objectives (sites Mo1 – Mo5)

Morden neighbourhood site allocations					
Site ref:	MO1: Chaucer Centre	Mo2: Farm Road Church	Mo3: Imperial Sports Ground Tooting and Mitcham Hub	Mo4: Morden Regeneration Zone	Mo5: Morden Road Clinic and Morden Hall Medical Centre
Site allocation	Mixed-use residential and community uses such as clinics, health centres, crèches, day nurseries, day centre or solely residential, subject to the existing training facility being provided on a suitable site elsewhere within the borough.	Residential.	Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development on this site subject to meeting planning policy, evidence and consultation. Any enabling development would be expected to directly fund long-term capital investment in sporting facilities on Tooting and Mitcham Hub	Mixed retail, office, commercial (including restaurants/cafes), community use (including health centre), transport infrastructure, public realm and residential.	Healthcare led mixed-use scheme with residential or solely residential if an NHS primary healthcare facility with similar or greater capacity is provided within Morden town centre.
SA objective					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					

SO11					
SO12					
SO13					
SO14					
SO15					
SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure x: Morden site allocations assessed against the SA Objectives (sites Mo1 – Mo5)

Morden neighbourhood site allocations		
Site ref:	Mo6: York Close Car	Mo7: Gifford House
Site allocation	Parking and residential or solely residential, if not needed for parking	Residential
SA objective		
SO1		
SO2		
SO3		
SO4		
SO5		
SO6		
SO7		
SO8		
SO9		
SO10		
SO11		
SO12		
SO13		
SO14		
SO15		
SO16		
SO17		
SO18		
SO19		
SO20		
SO21		
SO22		

Figure x: Raynes Park site allocations (RP1- RP5) assessed against the SA Objectives.

Site ref.	RP1: Amity Grove Clinic.	RP2: 245 -247 Burlington Road.	RP3: Tesco, Burlington Road.	RP4: 80-86 Bushey Road.	RP5: All England Lawn Tennis Club Community Sports Ground 216 Grand Drive,
Site allocation.	Residential.	Commercial, business, service and community use appropriate to a residential area.	Comprehensive redevelopment of the site to keep the supermarket with the same floorspace as exists in a new, purpose-built unit and to optimise the rest of the site for delivering new homes, landscaping and access.	Site allocation: Residential-led mixed use development with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area.	Tennis facilities connected with AELTC's operation of The Wimbledon Championships, the Wimbledon Junior Tennis Initiative, community tennis programmes with support for continued and long-term investment in the same. The site can be found in designated open space with sport and recreation use that are compatible with open space designation.
SA objectives					
SO1					
SO2					
SO3					
SO4					
SO5					
SO6					
SO7					
SO8					
SO9					
SO10					
SO11					
SO12					
SO13					
SO14					
SO15					

SO16					
SO17					
SO18					
SO19					
SO20					
SO21					
SO22					

Figure x: Raynes Park site allocations (RP6- RP8) assessed against the SA Objectives.

Site ref.	RP6: Land at the former LESSA Sports Ground Grand Drive	RP7: Rainbow Industrial Estate Grand Drive	RP8: West Barnes Library
Site allocation.	Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered.	Employment led regeneration in line Rainbow Industrial Estate planning brief, including public realm improvements close to Raynes Park station. Proposed allocation to clarify the existing planning approach.	Library with residential on upper floors
SA objectives			
SO1			
SO2			
SO3			
SO4			
SO5			
SO6			
SO7			
SO8			
SO9			
SO10			
SO11			
SO12			
SO13			
SO14			

SO15			
SO16			
SO17			
SO18			
SO19			
SO20			
SO21			
SO22			

Figure x: Wimbledon site allocations assessed against the SA Objectives (Wi1- Wi8)

Wimbledon neighbourhood site allocations

Site allocation >>>	W1 Battle Close, North Road	Wi2: Broadway Car Park,	Wi3: All England Lawn Tennis Club	Wi5: Hartfield Road Car Park	Wi6; Highlands House, 165-171 The Broadway	Wi7: Rufus Business Centre	Wi8: South Wimbledon Station
SA objectives							
SO1							
SO2							
SO3							
SO4							
SO5							
SO6							
SO7							
SO8							
SO9							
SO10							
SO11							
SO12							
SO13							
SO14							
SO15							
SO16							
SO17							
SO18							
SO19							
SO20							
SO21							
SO22							

Figure x: Wimbledon site allocations assessed against the SA Objectives (Wi9- Wi16)

Wimbledon neighbourhood site allocations

Site allocation >>>	Wi9: 28 St George's Road	Wi10: Prospect House, 30 St George's Road	Wi11: Victoria Crescent, 39-59 The Broadway	Wi12: Wimbledon Stadium and Volante Site	Wi13: 8-20 Worple Road and 20-26 St George's Road	Wi15: YMCA Wimbledon	Wi16: Centre Court Shopping Centre
SA objectives							
S01							
S02							
S03							
S04							
S05							
S06							
S07							
S08							
S09							
S010							
S011							
S012							
S013							
S014							
S015							
S016							
S017							
S018							
S019							
S020							
S021							
S022							

5.3 **Green infrastructure boundary changes** The Environment Partnership (TEP) was commissioned by the London Borough of Merton (the Council) to assess the borough's green and blue infrastructure, biodiversity and open spaces and provide an evidence to support the base document to inform the preparation and implementation of the new Local Plan. [Merton Green Infrastructure Study 2020](#) assessed the quantity, accessibility, quality and value of open spaces throughout the borough and was carried out in line with national and London guidance and policies. The objectives of the Study were to:

- Evaluate the quantity, quality, value and accessibility of several types of open space and green infrastructure throughout the borough.
- Identify any specific needs or areas of deficiency in access to green and open space and nature conversation areas and how these deficiencies should be addressed.
- Determine the impact of projected population changes across the borough and housing intensifications in the identified growth areas and other small sites, on open spaces.
- Identify any areas of open space and nature conservation areas that are surplus to requirements, and in accordance with agreed criteria, any areas that have potential to be designated as Local Open Space and/or Metropolitan Open Land.
- Undertake a biodiversity assessment of the borough's Sites of Importance for Nature Conservation (SINCs) and identify any special protection green areas of local importance.
- Support the borough's health and wellbeing priorities as set out in Merton's Health and Wellbeing Strategy.
- Undertake consultation with user groups in the borough to figure out perceptions of Merton's open spaces and priorities for the future.

5.4 The Study is aligned with other evidence base documents including the Playing Pitch Strategy (2019) and the Health and Wellbeing Strategy (2019) and supports the preparation of the Infrastructure Delivery Plan (IDP). In turn, this will aid in the justification of future development contributions and the collection and spending of the Community Infrastructure Levy (CIL). Sites designated as MOL (Metropolitan Open Land), Open Space, SINC (Site of Importance for Nature Conservation) and Green Corridors have been reviewed and proposed boundary are informed by the recommendations of the Study, London Plan and NPPF definitions and criteria of each type of open space. Boundary changes have also been recommended for sites that have received planning permission and those that have been reviewed by the Future Merton and Greenspaces teams following Stage 2a consultation responses. All sites have been reviewed in line with the criteria set out in the Green Infrastructure Study 2020.

Appendix C identify sites that have been recommended for boundary changes. In accordance with guidance on Sustainability Appraisals these changes to the plan are not significant and will not require further sustainability appraisal work.

Appendices

Appendix A: Summary of policy changes since draft stage 2a

Figure X: Summary of policy changes in the draft plan

Policy Title as at Stage 2a	What has happened to get to Stage 3?
Strategic Policy H4.1: Housing Choice	Changes made to ensure greater conformity with the London Plan. Also, greater clarity added regarding definition of affordable housing tenures and calculation of cash in lieu in justificatory text (JT).
Strategic Policy H4.2: Housing Provision	Same policy direction – changes to now reflect the published London Plan housing target for Merton. Justification setting out the trajectory approach to delivery of the target.
Policy 4.3 Housing Mix	Very minor change to improve clarity.
Policy H4.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.	Very minor changes to improve clarity.
Policy H4.5 Student housing, other housing with shared facilities and bedsits	Very minor change in the justification section
Policy H4.6 Accommodation of Gypsies and Travellers	Substantial additions in line with Merton's 2019 Gypsies and Travellers Accommodation Assessment (GTAA) Study
Policy H4.6 Accommodation of Gypsies and Travellers	Changes made to address conformity issues raised by the GLA.

Strategic Policy HW2.1 Health and wellbeing	Some minor changes – linking 20 minutes neighbourhood principles and others.
Policy HW2.2 Delivering healthy places.	Minor changes for clarity.
Neighbourhoods	
Policy N3.1 Colliers Wood/ Surrounding area of Colliers Wood.	Same policy direction as before – minor changes for clarity
Policy N3.2 Mitcham Town Centre/ Surrounding area of Mitcham Town Centre	Similar policy direction – slightly more substantial changes recognising the sites coming forward.
Policy N3.3 Morden/ Morden Regeneration Zone/ The Wider Morden Town Centre Area	<p>Change to policy approach - “comprehensive regeneration” is now the preferred delivery strategy, while previously it was the only approach supported.</p> <p>The Wider Morden Town Centre Area will now be delivered through incremental change, instead of part of a plan-led approach, which will now only address the regeneration within the Morden Regeneration Zone.</p> <p>In the Wider Morden Town Centre Area, tall buildings may now only be acceptable on sites that are outside but near the Morden Regeneration Zone and the council will actively co-ordinate the details of proposed tall buildings on a case-by-case basis with reference to the numerous criteria in policies D5.1 – D5.5.</p> <p>The policy now also points out that the wider Morden Town Centre area is within an Opportunity Area.</p> <p>Numerous minor changes for clarity.</p>
Policy N3.4 Raynes Park Local Centre/ Surrounding area of Raynes Park Local Centre	Same policy direction as before – minor changes for clarity
Policy N3.6 Wimbledon Town Centre/ Surrounding neighbourhoods of	Same policy direction as before – minor changes for clarity

Wimbledon.	
Policy N3.5 South Wimbledon	Same policy direction as before – minor changes for clarity. Changes to the boundary of the proposed town centre (NB there are no site allocations in this policy)
Policy 0.87 Wandle Valley (formerly N3)	This row can be deleted – for Stage 2a this was published under Policy O8.7 (GBI Chapter).
Strategic Policy D5.1 Placemaking and design Delivering well designed and resilient neighbourhoods.	Substantially rewritten and renamed policy.
Policy D5.2 Urban design and the public realm	Substantially rewritten and renamed policy.
Policy D5.3 Ensuring high quality design considerations for all developments.	Substantially rewritten and renamed policy.
Policy D5.4 Alterations and extensions to existing buildings	Same policy direction as before – minor changes for clarity.
Policy D5.5 Managing heritage assets.	Same policy direction as before – minor changes for clarity.
Policy D5.6 Advertisements	Same policy direction as before – minor changes for clarity.
Policy D5.7 Telecommunications	Same policy direction as before – minor changes for clarity.
Policy D5.8 Shop front design and signage.	Same policy direction as before – minor changes for clarity.
Policy D5.9 Dwelling Conversions.	Same policy direction as before – minor changes for clarity.
Policy D5.10 Basements and subterranean design	Same policy direction as before – minor changes for clarity.
Policy D5. 11“Tall Buildings”	New policy
Strategic Policy In6.1 Infrastructure	Strategic policy (f) (and justification text) added on sport and recreation to align with the

	<p>Sport and Recreation policy moving to the infrastructure chapter – this was moved from the Green and Blue Infrastructure chapter.</p> <p>Some minor wording amendments made to the justification text following responses from infrastructure providers.</p>
Policy In6.2 Social and community infrastructure	<p>Minor addition to policy (b) in response to HUDU (Healthy Urban Development Unit) request - to conform with London Plan policy.</p> <p>Some justification text added following response from HUDU.</p> <p>Some justification text added on Covid.</p>
Policy O8.5 Sport and Recreation (formerly O8.5)	<p>This policy has been moved from the Green and Blue Infrastructure chapter to the Infrastructure Chapter.</p> <p>There are no substantial changes made to the policy following Stage 2a consultation.</p> <p>Minor additional wording added to the justification text at the request of MCIL to strengthen recognition of the importance of disability access.</p>
Strategic policy W.6.3 Waste management	Same policy direction as before – minor changes for clarity.
Strategic Policy T6.4 Improving travel choices.	Similar policy direction but redrafted substantially and renamed Sustainable travel choices.
Policy T6.5 Prioritising Walking.	Policy T6.5 and T6.6 have been combined into one policy that focuses on active travel choices. Policy has been redrafted significantly and policy added in relation to bike boxes on residential frontages. Policy has been renamed “Prioritising active travel choices”.
Policy T6.6 Prioritising cycling	Policy T6.5 and T6.6 have been combined into one policy that focuses on active travel choices. Policy has been redrafted significantly and policy added in relation to bike boxes on residential frontages. Policy has been renamed “Prioritising active travel

	choices”.
Policy T6.7 Managing transport impacts.	Similar policy direction but redrafted substantially and now incorporates policy aspects in relation to deliveries and servicing.
Policy T6.8 Parking, deliveries, and servicing	Changes made to ensure greater conformity with the London Plan in relation to parking standards. Otherwise, similar policy direction but redrafted substantially. Policies on delivery and servicing moved to T6.7. Renamed to parking and low emissions vehicles.
Policy T6.9 Supporting Transport Infrastructure	Similar policy direction but redrafted.
Policy Ec7.1 Economic Development- Promoting economic growth and successful high streets	Redrafted strategic policy – some quite substantial changes from Stage 2a.
Policy Ec 7.2 Employment areas in Merton Business locations in Merton	Same policy direction as before and incorporates offices.
Policy Ec 7.3 Offices in town centres	Move into business locations in Merton policy.
Policy Ec7.4 Protection of scattered employment sites	Same direction as before
Policy Ec7.5 Local employment opportunities	Same direction as before
Policy Tc7.6 Location and scale of development in Merton’s town centres and neighbourhood parades	Similar policy direction as before but much more focussed policy
Policy Tc7.7 Protection of shopping facilities within designated shopping frontages-	Removed.
Policy Tc7.8 Development of town centre type uses outside town centres.	Same policy direction as before.
Policy Tc7.9 Protecting corner/ local shops.	Same policy direction as before
Food and drink / leisure and entertainment	Same as before

uses Policy Tc7.10	
Policy Tc7.11 Culture, arts and tourism development	Same as before
Strategic Policy O8.1 Open Space, Green Infrastructure and Nature Conservation	<p>Strategic policy (b) reworded to strengthen wording on walking and cycling accessibility – suggested by Louisa. Was “encourage” now “protect and seek improvements to”.</p> <p>Strategic policy (e) reworded for clarity on increasing “green infrastructure” and not just “trees”.</p> <p>Strategic policy (i) on sport and recreation is deleted – has been moved to the infrastructure chapter.</p> <p>Some additions to the justification text to make clear references to the London Plan.</p> <p>Additional justification text from Louisa on pedestrian and cycle routes through green spaces.</p>
Policy O8.2 Open Space and Green Infrastructure	<p>Policy (d) amended to strengthen wording. Did “support” now “require” for publicly accessible open space for major developments in areas of deficiency. Policy was reviewed following comments made in Stage 2a.</p> <p>Policy (f) amended to align with the terminology used in H&W chapter wording on food growing.</p> <p>Policy (g) amended for clarity.</p> <p>Justification text added on COVID.</p> <p>Minor changes to justification text for clarity following responses made on:</p> <ul style="list-style-type: none"> - Historic role open spaces can play. - Public access routes being accessible to all. - No need to allotment expansion (confirmation from Greenspaces team)

Policy O8.3 Biodiversity and access to nature conservation.	<p>Policy (c) amended to align with NPPF and be positively worded.</p> <p>Policies (d) and (f) amended for clarity.</p> <p>Additional justification text on protected species – for clarity.</p> <p>Additional justification text on biodiversity net gain.</p> <p>Minor wording correction made to geodiversity.</p>
Policy O8.4 Protection of Trees	<p>Policy (b) amended to strengthen wording.</p> <p>Policy (c) amended to add wording on tree canopy.</p> <p>Policy (g) amended to strength wording “was ensure” now “require”.</p> <p>Justification text added on the following (from Stage 2a responses received):</p> <ul style="list-style-type: none"> - Mature trees - Amenity value of trees - Ancient woodland and veteran trees - Valuation systems (in line with London Plan wording) - Consideration of design schemes that do not involve tree removal. - Use of planning conditions & s106. - Species selection
Policy O8.5 Sport and Recreation	This policy has now moved to the infrastructure chapter.
Policy O8.6 Urban Greening	<p>There are no substantial changes to the policy following Stage 2a consultation.</p> <p>Minor additional wording at the request of the Woodlands Trust to add the wording “hedgerows” to justification text.</p>

	Additional paragraph added to the justification text to link the policy with the climate change policies – namely mitigating overheating and adverse impacts on the urban heat island effect.
Policy 0.87 Wandle Valley Regional Park (formerly N3)	<p>New name of policy – added “Regional Park” as this is the focus of the policy.</p> <p>Following consultation responses, a new policy has been included. This was previously justification text, but it is agreed that it is better suited as a policy requirement to strengthen the requirements for urban greening:</p> <p>h. Expect all new development within 400m of the park to provide green infrastructure elements on site through urban greening.</p> <p>Some other minor changes made to the policy and justification text.</p>
Strategic Policy F8.6 Managing flood risk from all sources of flooding.	
Policy F8.7 How to manage flood risk.	Some minor changes – following evidence of the Strategic Flood Risk Assessment 2020.
Policy F8.8 Sustainable drainage systems (SUDS)	As above.
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.	Some minor changes to provide clarity and text in the justification to linking the policy to the transport policies on managing the impacts HGV’s and air quality.
Strategic Policy CC8.10 Promoting sustainable design to mitigate and adapt to climate change.	<p>No significant changes to this policy.</p> <p>Added clarification in the justification regarding the definition of net-zero carbon. Also set out where climate adaptation is addressed in the Local Plan now that policy CC8.16 has been deleted.</p>

Policy CC8.11 Minimising greenhouse gas emissions).	<p>No significant changes to this policy.</p> <p>Amended policy wording to emphasize that all development should be aiming for net-zero carbon on site but that refurbishments will not be required to offset any carbon shortfall, to support the retrofit of existing buildings and minimise embodied carbon emissions.</p> <p>Reordering of and amendments to the justification considering the above and to clarify the difference between the Mayor's zero carbon target and true net-zero carbon considering consultation feedback.</p>
Policy CC8.12 Minimising energy use	<p>No significant changes to the policy.</p> <p>Wording changes in the policy and justification to put more emphasis on unregulated emissions and Energy Use Intensity targets, and to clarify the reporting requirements for major and minor schemes considering consultation feedback.</p>
Policy CC8.13 Low carbon energy	<p>No major changes to this policy.</p> <p>Clarified policy wording re banning gas boilers in new dwellings and new non-domestic considering feedback.</p> <p>Removed policy wording re heat networks to have a more balanced policy which doesn't prioritise heat networks over individual heating systems, considering feedback regarding heat losses.</p> <p>Clarified in the justification that Passivhaus certification will be required for schemes proposing to use direct electric heating to minimise operational running costs and mitigate the risk of fuel poverty considering feedback.</p> <p>Included clarification in the justification re checking renewable energy generation against the anticipated Energy Use Intensity considering feedback from Etude.</p>
Policy CC8.14 Minimising waste and promoting a circular economy.	<p>Policy and justification have been updated: The Whole-life cycle carbon assessment will only be required for referable schemes and schemes proposing to demolish and rebuild a single dwelling (instead of all major schemes and all demolish and rebuild</p>

	schemes) considering feedback from industry.
Policy CC8.15 Sustainable design standards	<p>Changed threshold for BREEAM requirements considering feedback. BREEAM certification will only be required for domestic refurbishments of 10 or more units (instead of 1 unit and above), and non-domestic new build and refurbishments of 1000sqm and above (instead of 500sqm and above), so as not to be overly burdensome for smaller schemes.</p> <p>Justification for water efficiency targets has been updated considering feedback from Thames Water.</p>
Policy CC8.16 Adapting to a changing climate.	This policy has been deleted to avoid repetition across the Local Plan. The climate adaptation requirements have been embedded in the relevant other policies for example: Design, Green and Blue Infrastructure and Sustainable Design.

Appendix B: Baseline data.

Data limitations

- 8.1 Information or data used to help explain current situations or trends change over time. However, this does not necessarily link cause and effect overtly and is limited in how they can explain why particular trends are occurring and the secondary effects of any changes. The data therefore acts as an indicator and been selected to monitor progress towards the achievement of particular objectives and to provide a tangible measure concerning broader issues. This measure is often only a small part of meeting the objective so may simplify the issues and interactions.
- 8.2 The appraisal, therefore, relies on a mixture of quantified data and professional judgement. Accordingly, the baseline includes a commentary concerning the trend indicated by the current and historical data. External bodies collect much of the data used in this report for example Office of National Statics (ONS) and the Greater London Authority (GLA). The spatial and temporal data collected and future changes to the methodology of the data collect are not within the control of Merton Council. It should be noted there are some gaps in the data collected, as not all information is consistently available. As part of the SA/SEA process a Scoping Report including baseline data. For this report the Council has carried out a summary update of the baseline data.

Merton the place

- 8.3 Merton is an outer London borough situated to the south west of the capital. It borders with the London Boroughs of Wandsworth, Sutton, Kingston, Croydon and Lambeth. The borough is predominantly residential in character (42% of the area) but with variation in density and characteristics of development particularly between the east to west and

north to south of the borough and associated economic and social differences.

Figure X: Borough of Merton



- 8.4 Merton is the one of the smallest boroughs in London with an area of 37 square kilometres. Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 18% of the borough's area is open space, compared to the 10% London average.
- 8.5 The quality and historical character of the borough reflects the number of high-quality heritage areas designated as Conservation Areas. The northern parts of the borough are characterised by tightly packed streets of late Victorian or

Edwardian terraced housing around north Mitcham, Colliers Wood, South Wimbledon and Wimbledon Park and larger detached or semi-detached homes around Wimbledon.

- 8.6 The 1930's suburbia characterises large parts of the south and west of Merton with lower density semi-detached houses and short terraces with gardens, in tree lined roads with wide grass verges. These areas merge with the neighbouring boroughs of Sutton and Croydon. Within Merton there are a number of pockets of affluence and of, multiple deprivation. Although deprivation is mainly in the eastern side of the borough merging with Lambeth and Croydon, there are also some pockets in the west of the borough.

Environment baseline data

Green infrastructure and biodiversity

- 8.7 Within Merton, there is one Site of Special Scientific Interest (SSSI) designation, Wimbledon Common. Wimbledon Common extends across the borough boundaries of Merton and Wandsworth. As such Wimbledon Common is divided into five units, 3 of which are in Merton and 2 in in the borough of Wandsworth. As well as its SSSI designation, Wimbledon is also designated as a Special Area of Conservation (SAC), SSSI and Water Framework Directive (WFD). Appendix 1 Maps: identifies the SSSI and SAC.
- 8.8 The common measures 351.38 ha and is located 1.5km to the north west of Wimbledon town centre and 1km of Richmond Park. The majority of the SAC is located within Merton and a smaller area within Putney Heath (London Borough of Wandsworth).
- 8.9 The west of Wimbledon Common SAC also borders the Royal Borough of Kingston upon Thames and consists of the following general habitat types:
- Inland water bodies (standing water, running water) (1%)
 - Bogs Marshes Water fringed vegetation. Fens (0.5%)
 - Heath Scrub Maquis and garrigue *Phygrana* (5%)
 - Dry grassland Steppes (45%)
 - Improved grassland (3.5%)
 - Broad-leaved deciduous woodland (45%)

- 8.10 Wimbledon Common is one of the largest areas of uncultivated land in London and sits in the Thames Valley Natural Character Area. The underlying soils are mostly sands, gravel and silty clays which give rise to poorly drained, nutrient poor and acid conditions.
- 8.11 Notified features of Wimbledon Common are:
- *Calluna vulgaris* (commonly known as Heather) - *Ulex minor* heath.
 - *Erica tetralix* - *Sphagnum compactum* wet heath
 - *Molinia caerulea* - *Potentilla erecta* mire
 - *Festuca ovina* - *Agrostis capillaris* - *Rumex acetosella* grassland
 - *Festuca ovina* - *Agrostis capillaris* - *Galium saxatile* grassland
 - *Quercus robur* - *Pteridium aquilinum* - *Rubus fruticosus* woodland
- 8.12 Other key environmental assets of Wimbledon Common:
- London Wildlife Trust managed Local Nature Reserve Fishpond Wood (managed
 - Largest area of wet heath in London, areas of dry heath and one of London's very few sphagnum bogs
 - High ground hosts an ancient tumulus and an ancient monument, Caesar's Camp, can be seen near the Royal Wimbledon Golf Course.
- 8.13 Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Directive and is a primary reason for the designation of this site. Wimbledon Common also supports a number of other scarce invertebrate species associated with decaying timber.
- 8.14 The following Annex I habitats are present as a qualifying feature; however, these are not a primary reason for designation of this site.
- Northern Atlantic wet heaths with *Erica tetralix*
 - European dry heaths

Figure X Wimbledon Common SSSI unit review

<i>Unit name (unit number)</i>	<i>Condition</i>	Condition Threat Risk	Habitat	Area (ha)
<i>Putney heath (1)</i>	<i>Unfavourable- Recovering</i>	Medium	Dwarf Shrub Heath - Lowland	64.2291
<i>Hookhamslade (2)</i>	<i>Unfavourable – Recovering</i>	Medium	Acid Grassland - Lowland	129.3094
<i>Wandsworth woodland (6)</i>	<i>Unfavourable – Recovering</i>	Medium	Broadleaved, Mixed and Yew Woodland - Lowland	44.8322
<i>Merton woodland (8)</i>	<i>Unfavourable – Recovering.</i>	Medium	Broadleaved, Mixed and Yew Woodland - Lowland	95.395
<i>Southern Grassland/Heathland (9)</i>	<i>Unfavourable - No change</i>	No identified Condition Threat	Dwarf Shrub Heath - Lowland	17.6173

Source: Natural England (May 2018)

Nature Conservation and open space

8.15 As well as Wimbledon Common (SSSI (Sites of Special Scientific Interest)), Merton has other areas that are designated for their importance to nature conservation, they are as follows:

Figure X Nature Conservation

Sites of Metropolitan Importance for Nature Conservation	5
Site of Borough (Grade1) Importance for Nature Conservation	11
Site of Borough (Grade1) Importance for Nature Conservation	25
Sites of Local Importance for Nature Conservation	22
Local Nature Reserves	15

Source: Merton Local Plan (2014)

Open space and recreation

8.16 Merton has 1,329 hectares of open space, which accounts for 35% of the borough. Of this, 21% is public open space. In comparison, London has 42% open space, and 18% public open space¹⁷. Merton's Open Space land cover is similar to neighbouring outer boroughs Kingston (37%) and Sutton (34%). The largest open spaces in Merton are Wimbledon Common and Mitcham Common, with other large clusters of open space in Morden Park, Cannon Hill and the Wandle Valley.

Applying GLA population projections¹⁸, open space provision in 2018 is 6.3 hectares per 1,000 population, but with anticipated population growth (up to 2035), this will reduce to 5.6 hectares per 1,000 population. Using high and low population projections from Merton's Strategic Housing Market Assessment (SHMA)¹⁹, future provision ranges from 5.3 to 5.9 hectares per 1,000 population.

Figure 3 illustrates the quantity provision breakdown by ward.

Public Rights of way to access greenspaces.

8.17 All the Public Rights of Way (PROW) in the borough come under the responsibility of Merton Council. There are approximately 32kms of public rights of way, which the council maintains 12 Local authorities are required to assess the extent to which rights of way meet current and likely future needs of the public. Consideration must also be given to the opportunities provided by local rights of way, such as footpaths, cycle tracks, bridleways and restricted byways, for exercise and enjoyment of the area. A key responsibility is the assessment of the level of accessibility of local rights of way to those with restricted mobility with particular mention for those who are blind or partially sighted.

8.18 Merton as the Local Highway Authorities has a duty under the Wildlife and Countryside Act 1981 and the Highways Act 1980 to maintain and keep the definitive map and statement of public rights of way and to ensure that ways are adequately signposted, maintained and free from obstruction. Types of rights of way include:

- Footpath: When a path is used for walking only, it is a footpath. (This is different from the pavement alongside a road)
- Bridleway: Bridleways are also footpaths, but additionally users are permitted to ride or lead a horse and ride bicycles. Horse drawn vehicles are not allowed. Cyclists must give way to pedestrians and horse riders. Motorcycling is not allowed.

Conservation Areas and Historic Parks and Gardens

8.19 Merton has a 28 Conservation Area across the borough totalling 656.45 ha. Merton has 3 Historic Parks and Gardens; these are mainly in the west of the borough in the Wimbledon area.

Figure x: Merton's Historic Parks and Gardens

Name of Historic Park and Gardens	Grade
Cannizaro Park	Grade II*
Wimbledon Park	Grade II*
Morden Hall Park	Grade II
South Park Gardens	Grade II

Listed Buildings, Scheduled Ancient Monuments and Historic Sites

- 8.20 Merton has a rich heritage of buildings, which are of historical or architectural interest. A number of these buildings have been recognised as having a very special architectural or historic interest and have been included on the statutory list that is compiled and managed by Historic England.². Currently Merton has around 250 statutory listed buildings.
- 8.21 Scheduled monuments are not always ancient, or visible above ground. There are over 200 categories of monuments on the Schedule and they, range from prehistoric standing stones and burial mounds, through to the many types of medieval site (for example Merton Priory – an Augustinian priory). In Merton there are 3 Scheduled Ancient Monuments they are:
- Caesar’s Camp, Wimbledon Common
 - Merton Priory, South Wimbledon/Colliers Wood
 - Morden Park Mound, Morden
- Historic Sites**
- Southside House, Grade II* visitor attraction
 - National Trust, Morden Hall / Watermeads
 - Merton Abbey Mills
- 8.22 In Merton there are 4 registered museums in the borough:
- All England Lawn Tennis Museum
 - Wandle Industrial Museum
 - Wimbledon Society Museum of Local History
 - Wimbledon Windmill

² <https://historicengland.org.uk/>

Archaeological heritage

- 8.23 Merton's historic environment bears more than 10,000 years of human activity, ancient sites, monuments and landscapes, historic settlements, ancient features and finds. Remains of early settlements have also been found along the course of the River Wandle and Roman coins and pottery have been found in the vicinity of the Roman Road and Roman burials have also been discovered in Mitcham. Merton has 20 areas designated as Archaeology Priority Zones (APZs) arranged under a number of archaeological themes.

Figure 11: Archaeological Priority Zones

Type of Archaeological Theme	Name of Archaeological Priority Zone (APZ)	Description of site APZ
Alluvial	Wandle Valley Alluvium	This area includes the alluvial silts deposited within the Wandle Valley. Evidence for both prehistoric human activities, and the contemporary natural environment can be preserved within or beneath the alluvial deposits.
	Beverley Brook Valley Alluvium	This area maps the extent of alluvial deposits along the course of the Beverley Brook. Although this area is thought to have played a less significant role than the Wandle Valley in the history of the area, it has potential for the survival of evidence of past environments as well as prehistoric (and later) human activities.
Prehistoric Landscapes	Wimbledon Common	The status of Wimbledon Common itself means that there has been relatively little archaeological work in this area, but stray/casual finds have demonstrated that evidence covering the whole prehistoric period may be anticipated to survive as buried remains. The Priority Zone Designation extends beyond the modern limits of the Common to include additional areas where archaeological evidence for prehistoric landscapes has been shown to survive.
	Mitcham Common	This area takes in a swathe of gravel terrace on the eastern side of the Wandle Valley. Finds of Mesolithic and Neolithic flint tools, Bronze Age metalwork, and stray Iron Age coins have been

		recovered from this area, demonstrating the area's significance for early settlement and indicating its potential for the survival of further remains.
	Morden Park	This area encompasses the northern part of the modern Morden Park, where remains of Roman and medieval date have been found. The Park contains a Scheduled Monument 'Morden Park Mound', thought possibly to be (or to incorporate) a Roman burial mound, or to be an eighteenth century prospect mound created within Morden Park.
Settlements	Merton Village (South Wimbledon area towards Wimbledon Chase)	The medieval estate of Merton originated in the later Saxon period and is first referred to by name in a document of 949 AD. By the time of the Domesday Survey of 1086 the estate included a church and two mills, set within extensive agricultural land.
	Wimbledon	The historic village core occupies higher ground on the watershed between the valleys of the Wandle and the Beverley Brook. Wimbledon is not mentioned in the Domesday Survey, and it may have formed an outlying grange of the extensive Mortlake estate at that time. Wimbledon is recorded as a separate unit from the early fourteenth century onwards.
	Mitcham	The earliest historical reference to Mitcham settlement comes from an eighth century document, although archaeological evidence also points to unconnected Roman and early Saxon activity in the area. The medieval village developed as a 'ribbon' settlement along the London-Sutton Road, with two foci: Upper Green (probably also known as Michelham) and Lower Green (also known as Wickford Green).
	Morden	The estate of Morden is first referred to in the tenth century, and appears to have remained polyfocal with a particular cluster in the vicinity of the church throughout the medieval and post-medieval periods (this may be partly explained by its location on London Clay based soils rather than more easily cultivated gravels or river alluvium deposits). There was a second settlement at Lower

		Morden, near the Beverley Brook – this is identified as a separate Priority Zone (Map Area 11).
	Cannon Hill	An indication of human activity in this area on John Rocque's maps of 1749-62 suggests that this area may contain important remains.
	Lower Morden	Medieval finds have been recovered from this area, indicating early human activity.
	West Barnes	This zone covers the location of West Barnes Farm, a Medieval, probably moated, 'Grange' belonging to Merton Priory
Settlement - Communications Routes	'Stane Street'	The line of an important Roman road, crossing the Borough between Colliers Wood and Pylford Bridge. The route of the road is preserved in part by modern streets (High Street Colliers Wood, and parts of London Road, Morden – both parts of the A24), although it appears to have taken a more direct route across Wandle Valley than the present A24 (which runs to the north through Merton).
	Wandle/Copper Mill Lane	A centre of water-powered and water utilising industry from at least the medieval period onwards, this area included medieval corn mills and an eighteenth century copper mill. The latter was located at the end of Copper Mill Lane and was replaced, in the nineteenth century by a mill for the processing of leather
	Wandle/Colliers Wood	This area has formed a particular focus for riverside industry from at least the medieval period onwards, with several corn mills being located along this stretch of the river during the medieval period. These were supplanted in the post-medieval period by textile processing and finishing industries, initially calico bleaching and printing and subsequently the textile printing works of Arthur Liberty and of William Morris
	Wandle/Mitcham	The Wandle Riverside around Mitcham was famed in the eighteenth and nineteenth centuries for the market gardening of aromatic and medicinal herbs, watercress and other crops. It was also important in the seventeenth and eighteenth centuries for

Riverside Industries		calico bleaching and printing, copper, flour, and snuff milling, leather working and the manufacture of paper, flock and felt.
	Mill Corner	Documentary sources indicate the presence of a water mill on this part of the Beverley Brook in the fifteenth century, and also a series of fishponds. The mill appears to have been demolished sometime before the eighteenth century.
Post Medieval Estates and Gardens	Merton Place	Built around 1700, between the village of Merton and the River Wandle, possibly on the site of an earlier, medieval, moated structure. The house is noted as being the only house owned by Admiral Nelson who converted the moat into a garden feature and called it 'The Nile'.
	Wimbledon Park House	The house was originally built in 1588, but was much altered in the 1640s by Inigo Jones. The site of the early House is not known with certainty, but it is thought to lie close to the village church.
	Morden Hall and Park	The existing Morden Hall dates from the mid-eighteenth century, replacing an earlier, Tudor Manor House to the south. The Hall is moated and the moat is an eighteenth decorative feature contemporary with the house.

Blue infrastructure

Rivers

- 8.24 The River Graveney flows in an approximately east to west direction along the northern boundary of Merton. The area to the north east of Mitcham Eastfields railway station to be defined as Flood Zone 2 associated with the River Graveney, extending towards Oakleigh Way Recreation Ground and the northern part of Figge's Marsh.
- 8.25 Beverley Brook is a minor English river 14.3 km (8.9 mi) long in southwest London. The Beverley Brook flows in an approximately south north direction along the western boundary of Merton and eventually discharges into the River Thames at Barnes. It rises in Worcester Park and joins the River Thames to the north of Putney Embankment at Barn Elms.

- 8.26 The Pyl Brook is a tributary of the Beverley Brook. The Pyl Brook rises to the south of Sutton Common train station before flowing in an approximately south-east to northwest direction through Merton and connecting to the Beverley Brook in Beverley Park on the western boundary of Merton. An approximately 600m section of the Pyl Brook running adjacent to West Barnes Lane is culverted between Kingsway and Raynes Park High School. The Derwent Road Flood Storage Area provides additional storage from the Pyl Brook during periods of high flow. Areas surrounding Raynes Park High School, Memorial Ground, Westway and West Barnes Lane are defined as Flood Zone 3 associated with the Pyl Brook. Areas surrounding Cannon Hill Lane and Lower Morden Road are defined as Flood Zone 2. Appendix 1 Maps: identifies the rivers and flood zones in Merton.

Ordinary watercourse³ and reservoirs

- 8.27 In total there is approximately 69km of ordinary watercourse in Merton, approximately 5km of which is culverted⁴. The majority of watercourses are in Wimbledon Common, Mitcham Common, Raynes Park area, Cannon Hill Common and Wimbledon Park. Merton has 1 reservoir, Wimbledon Park Lake as defined under the Reservoir Act 1975 which is raised.

- 8.28 The lake in Wimbledon Park dates to 1765 when it was created for the first Earl Spencer as the central feature of a landscaped park in front of the family's mansion house located on the high ground up what is now Church Road towards Wimbledon Village. Responsibility for design was given to Lancelot 'Capability' Brown, was, then and still now, acknowledged as one of England's foremost landscape architects. 'Capability' Brown spent some 20 years transforming the formal Renaissance Gardens into a more natural landscape, including building a dam across the valley to convert a marshy stream and surrounding bog into an impressive 30-acre lake. The lake passed into public ownership in the early 20th Century when it was purchased by the forerunner of Merton Council. Since then, the lake has been used primarily as a reservoir and for leisure purposes including swimming, water sports and angling. The council has a Statutory and legal obligation to maintain the reservoir under Section 10 of the Reservoirs Act, 1975.

River biodiversity

- 8.29 The River Wandle is naturally a chalk stream and described as a rare and unique type of river. However, the long standing urban nature of the river has resulted in certain stretches being healthier than other parts of the river, with weirs commonly preventing fish from moving freely along the river.

³ A **watercourse** that is not part of a main river... all rivers and streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.'

⁴ A culvert is a structure that allows water to flow under a road, railroad, trail, or similar obstruction from one side to the other side. Typically embedded so as to be surrounded by soil, a culvert may be made from a pipe, reinforced concrete or other material.

8.30 The Environment Agency and partners are studying the options for improving fish movement up and down the River Wandle. An increase in fish passage will be required to enable the River Wandle to meet objectives set by the Water Framework Directive. In 2013 the Environment Agency fisheries survey on the River Wandle through Merton revealed a diverse fish population including:

- chub
- roach
- eel
- gudgeon
- dace
- perch
- dace
- carp bullhead
- stone loach

8.31 A fish survey of Wimbledon Common showed excellent fish populations to be present including chub, dace, eel, gudgeon, roach and 3 spined stickleback

Water supply and waste water treatment

Water supply

8.32 London's Victorian sewerage and water supply network is struggling to cope with current demands. Thames Water forecasts that, without significant new investment, demand for water will exceed supply by 10% in London by 2025, rising to 21% by 2040. This equates to a deficit of over half a billion litres of water a day by 2050. London's combined sewer system, built over 150 years ago was designed for a smaller, more permeable city. The challenges of London's growing population, changing land uses and changing climate mean that London is outgrowing its drains and sewers. This in turn is a contributing factor towards the increasing the risk of flooding.

8.33 The majority of Merton falls within Thames Water Utilities Ltd (known as Thames Water) resource zone apart from some areas near the borough boundary with Sutton. Merton's average water consumption is 160 litres per day (160/l/d) (2012), which is slightly above the London average (164/l/d), with around 25% of households with water-meters installed within their homes, an increase of 15% from 2001/01. Merton's population, as with the rest of the London population, mainly rely on water supplies that have

originated from outside London. 55% of the available water lies within the Thames Basin, 80% used for public water supply purpose.

Sewage treatment works

- 8.34 Merton is served by “Crossness” sewage treatment works; in 2009 it served a population of 1, 1890,000. Crossness is permitted to discharge 1,485,00m³/d of treated sewage effluent into the Thames Tideway. There are planned upgrades which will provide sufficient treatment at Crossness to ensure that it can cope with London’s growing population to at least 2021 whilst improved quality effluent to meet water quality requirements. The improvements will enable the site to treat 44% more sewage than at present. This increase in treatment capacity will allow for a 6% increase in population until 2021.

Energy use and supply

- 8.35 Reducing overall energy consumption and being more energy efficient is vital to reducing greenhouse gas emissions and contributing to a secure energy future. Reducing energy consumption through more efficient buildings and appliances can also help to tackle issues of energy affordability and fuel poverty.

- 8.36 Fuel poverty continues to be an issue in London, with 9.8% or 326,114 households meeting the Government’s ‘low income high cost’ definition of fuel poverty (compared to 10.4% across England). However, as the definition favours larger homes, there may be many households in smaller properties who also struggle to pay their fuel bills despite not meeting the definition. Fuel poverty tends to be more prevalent in inner London boroughs and lessens in outer London. However, in Merton it is estimated that 10.2% of household (8,151) are fuel poor, which is similar to London and England (2015). Between 2012 and 2014 levels of fuel poverty in Merton increased, although 2015 shows a slight fall. A similar trend is clear across London.

- 8.37 The demand for energy changes by season. In the winter months, consumption of gas is higher due to use of central heating for buildings. However, in the summer months, there is a general shift towards higher electricity use from air conditioning to cool buildings. Consumption can also vary from year to year depending on the weather.

- 8.38 Gas usage has decreased since 1990, and this trend is expected to continue despite projected population growth, however it is very much dependent upon national energy policies. Electricity usage has stabilised despite the increase in population, largely due to increased efficiency of appliances. However, it is expected that demand for electricity to rise as population continues to grow and heating and transportation are increasingly electrified, in favour of electricity from a decarbonised grid.

Noise and Vibration

- 8.39 There is no single definition of noise. Noise can be defined as unwanted sound. Often referred ironically, as the silent polluter, in that its effects can be hard to establish. This is because the problem is psychological: differences in perception such as the type or loudness of music for example. Noise disturbance can be associated with health problems such as sleep disturbance, stress, anxiety, high blood pressure, poor mental health in adults and school performance and cognitive impairment in children. Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. Continuous effects of noise pollution can also result in higher rates of cardiovascular disease and deteriorating mental health. Some of the main sources of noise across Merton are likely to include impacts from increasing levels of traffic on roads.
- 8.40 Three types of noise are defined in the Noise Policy Statement for England (NPSE) (March 2010); these are:
- environmental noise: which includes noise from transportation sources
 - neighbour noise: which includes noise from inside and outside people's homes
 - neighbourhood noise: which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street

Air Quality

- 8.41 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%).
- 8.42 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 B) 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.

8.43 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.

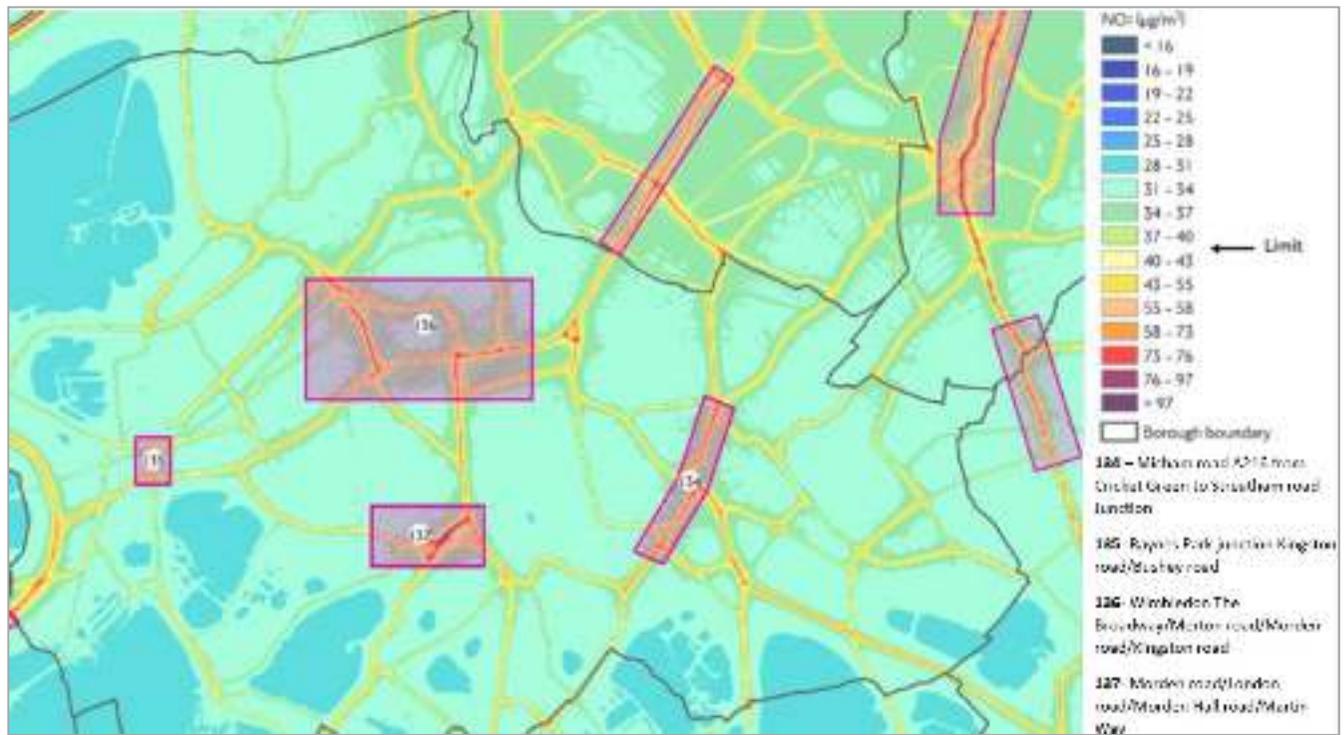


Figure x: CO2 emissions by source type

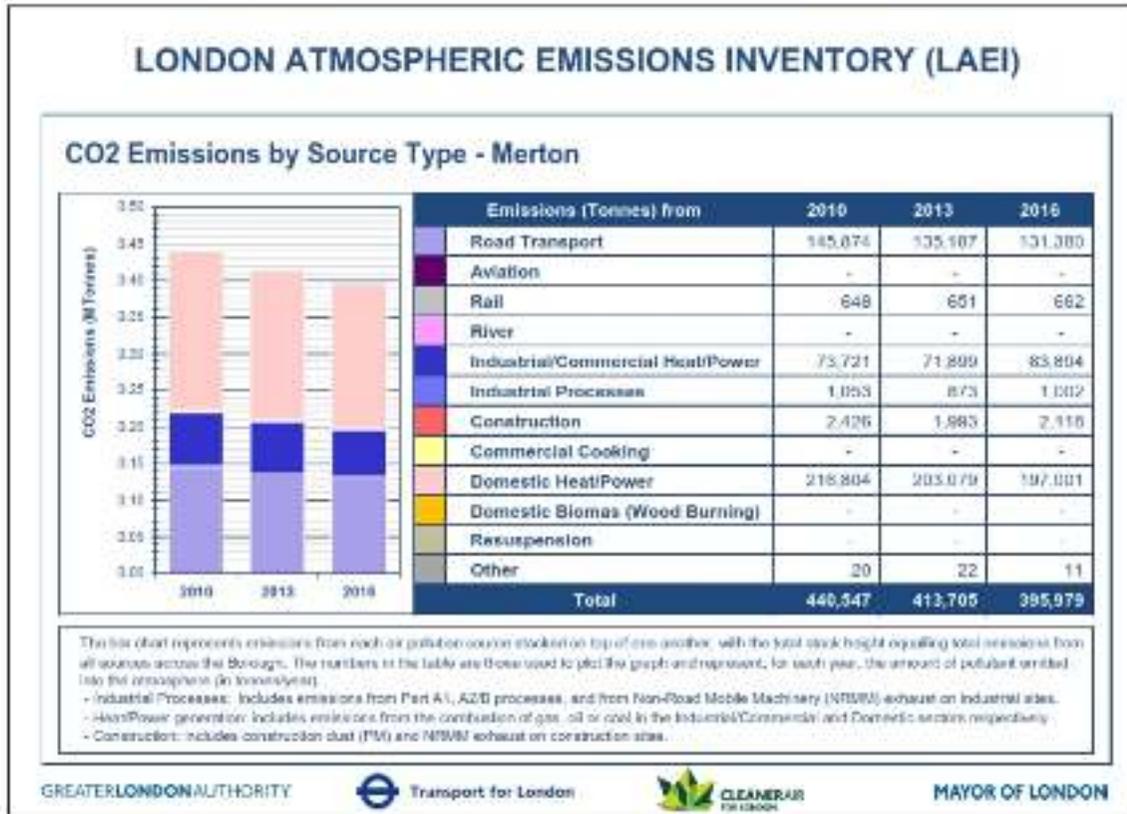


Figure x: NOx (nitrogen oxides) emissions by source

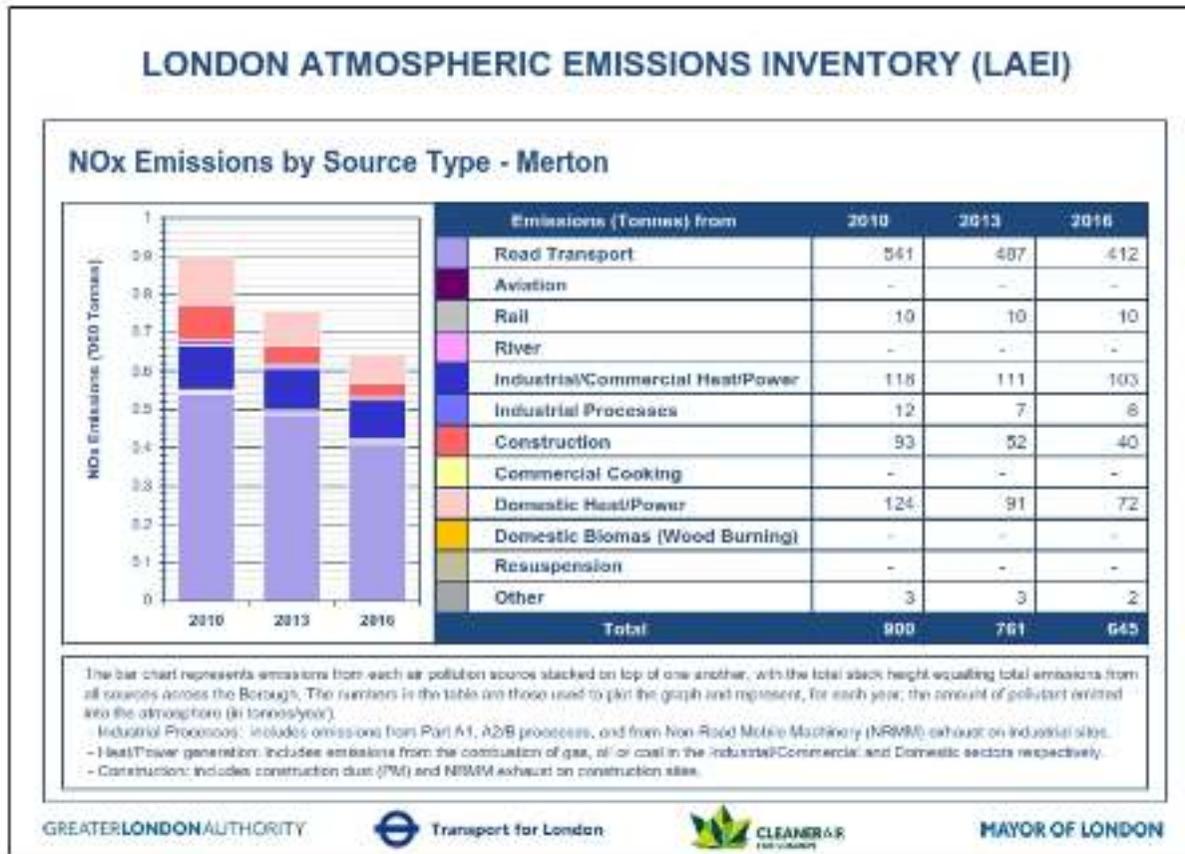
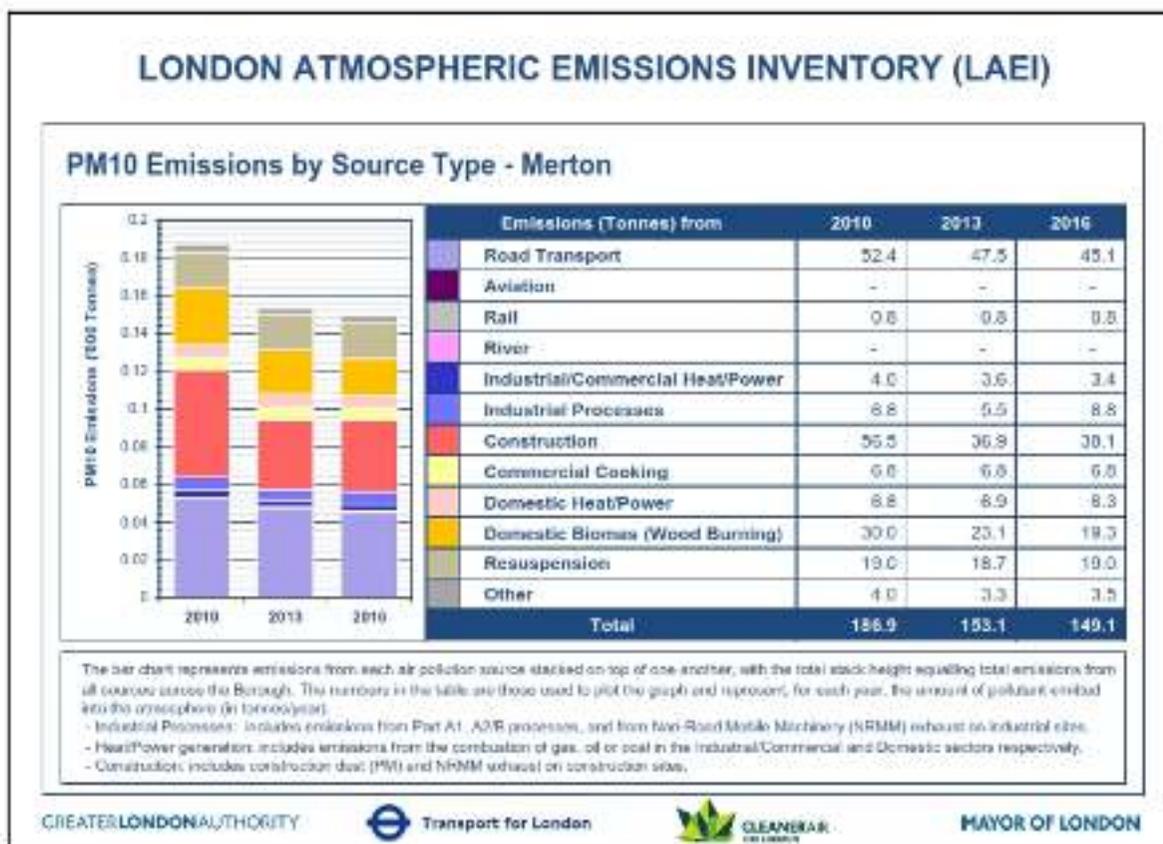
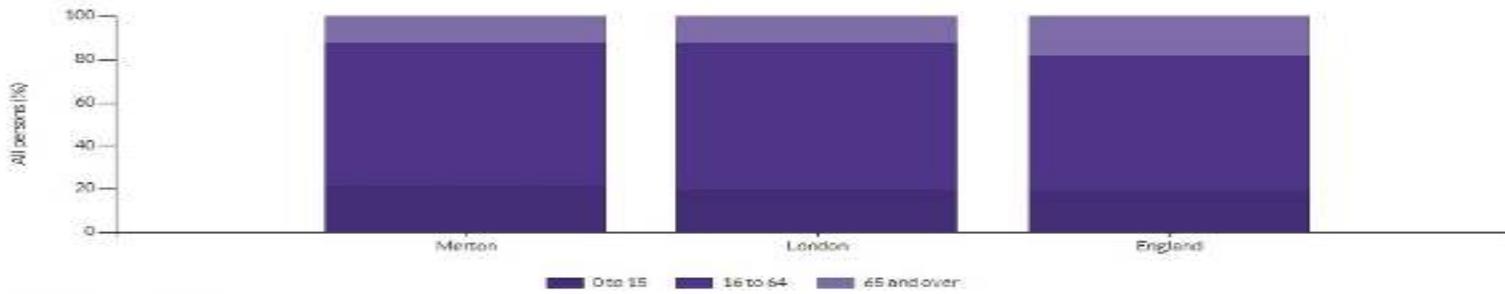


Figure x: PM10 emissions by source



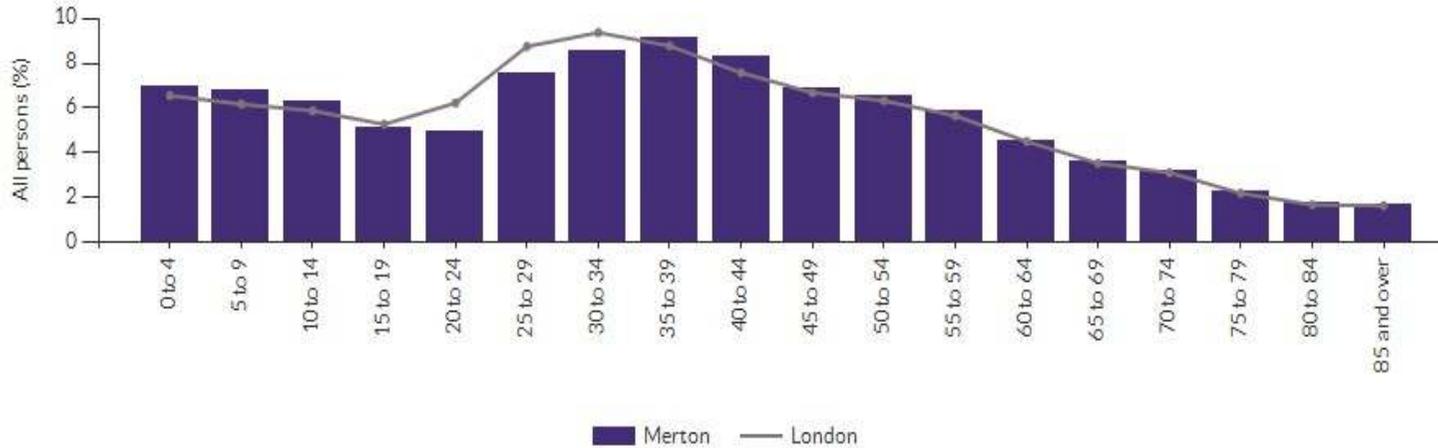
Social baseline data

Figure x: Population projections (Housing-Led)



Date: 2020 Source: GLA

Figure x: Population projection for all persons by 5-year age group



Date: 2020 Source: GLA

Figure x: Population projection for males and females

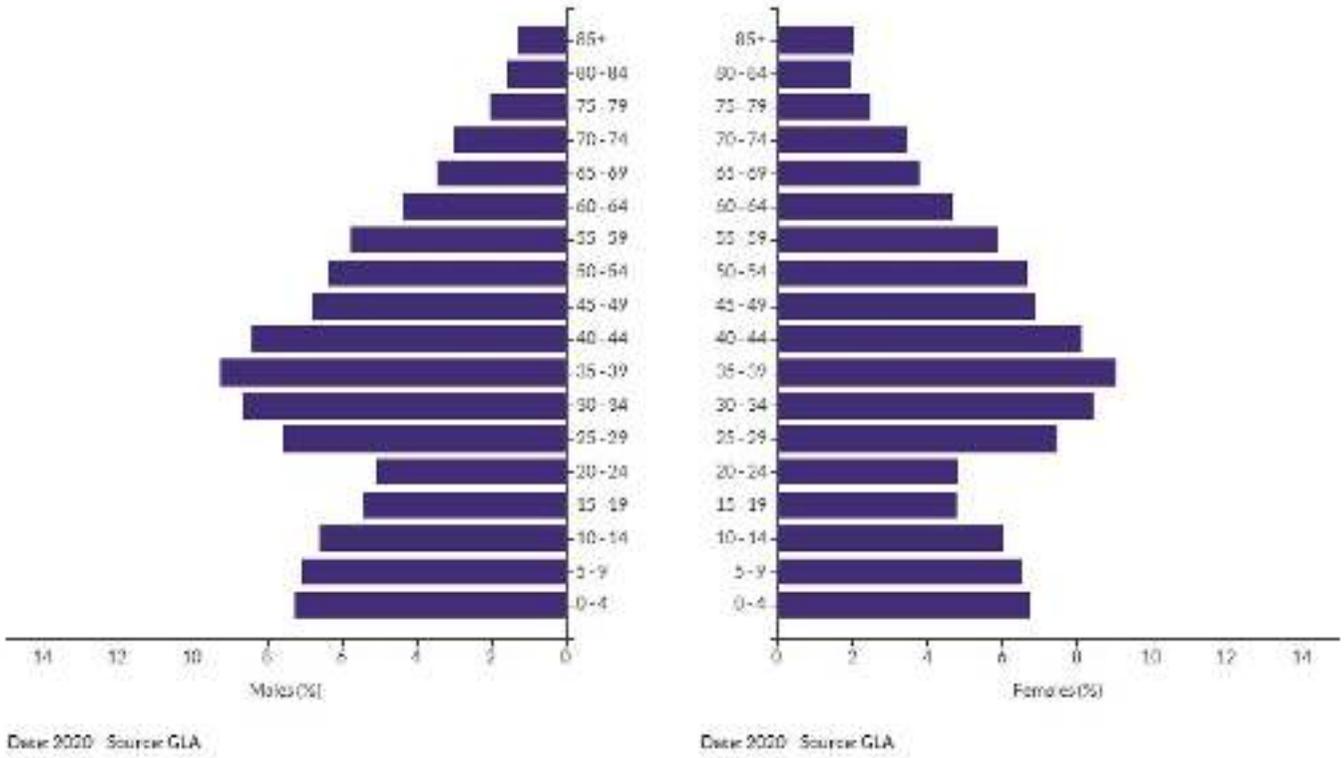
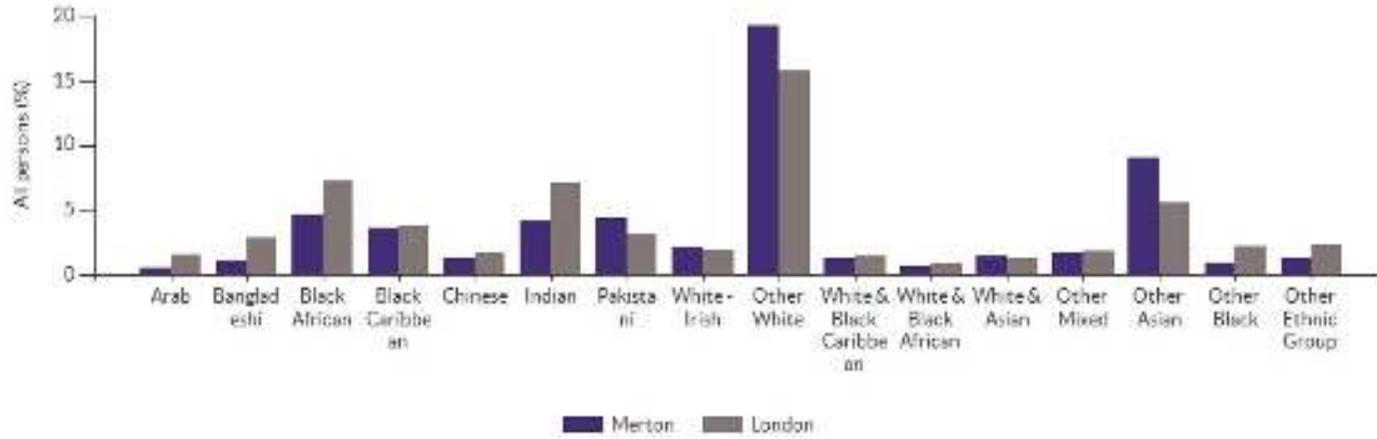
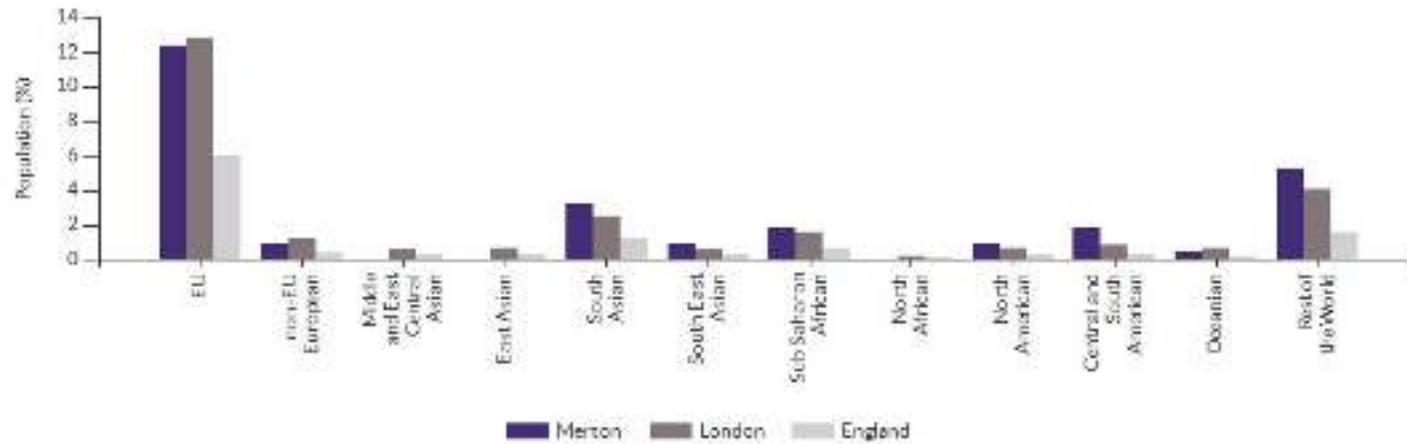


Figure x; Projected ethnic make-up



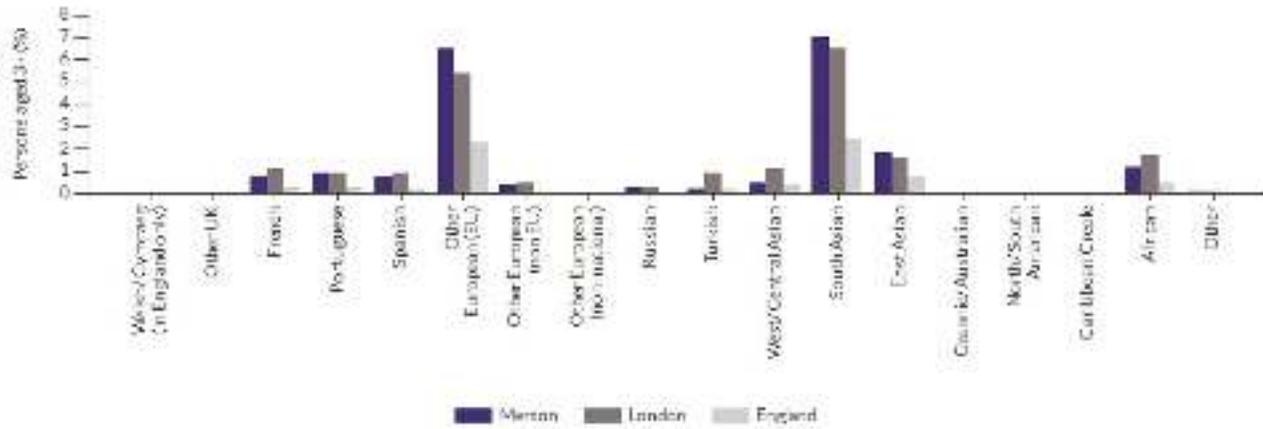
Date: 2020 Source: GLA

Figure XX Population by nationality (excluding UK)



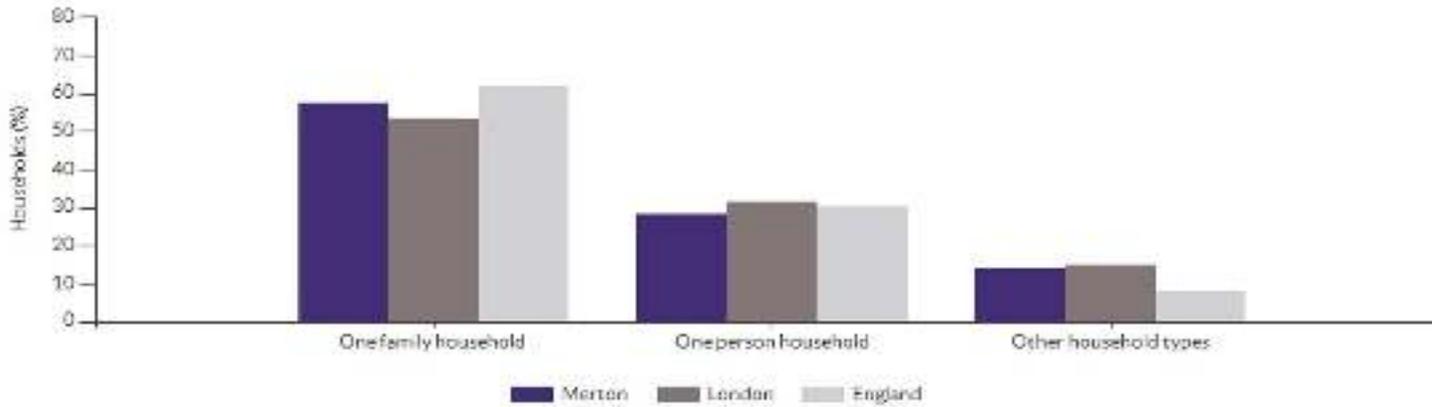
Date: 2019 Source: ONS

Figure xx: Main languages spoken in Merton



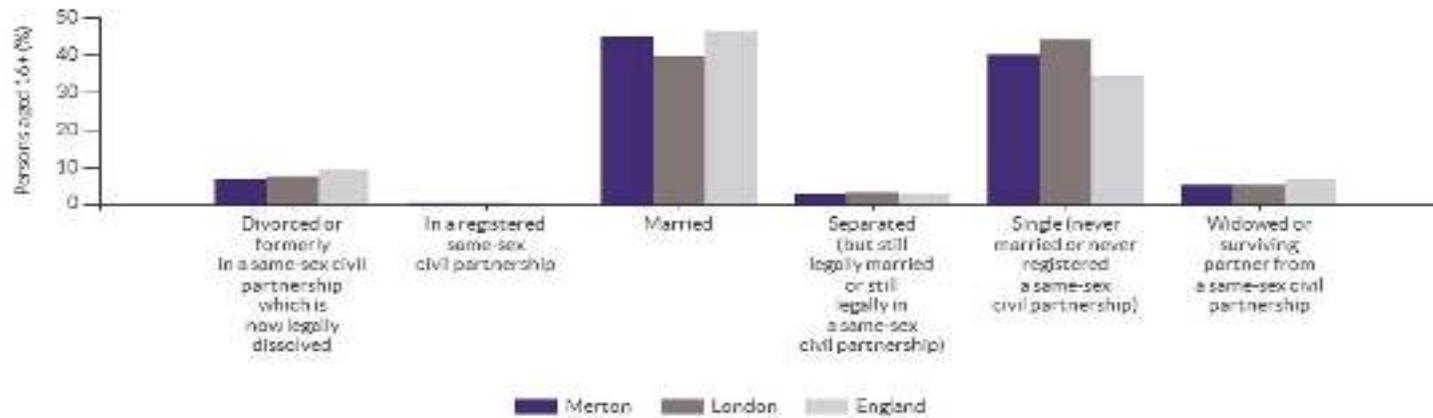
Source: ONS Census 2011

Figure xx: Household composition breakdown



Source: ONS Census 2011

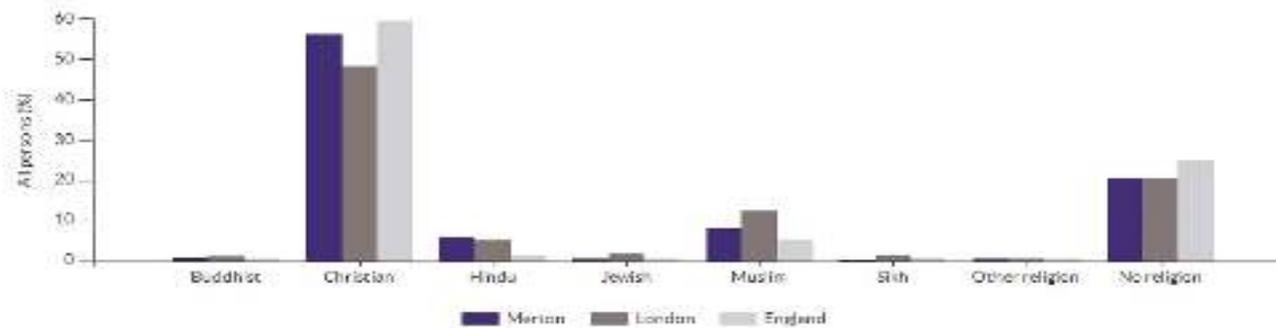
Figure xx: Marital and civil partnership status breakdown



Source: ONS Census 2011

Figure xx: Religion and beliefs in Merton

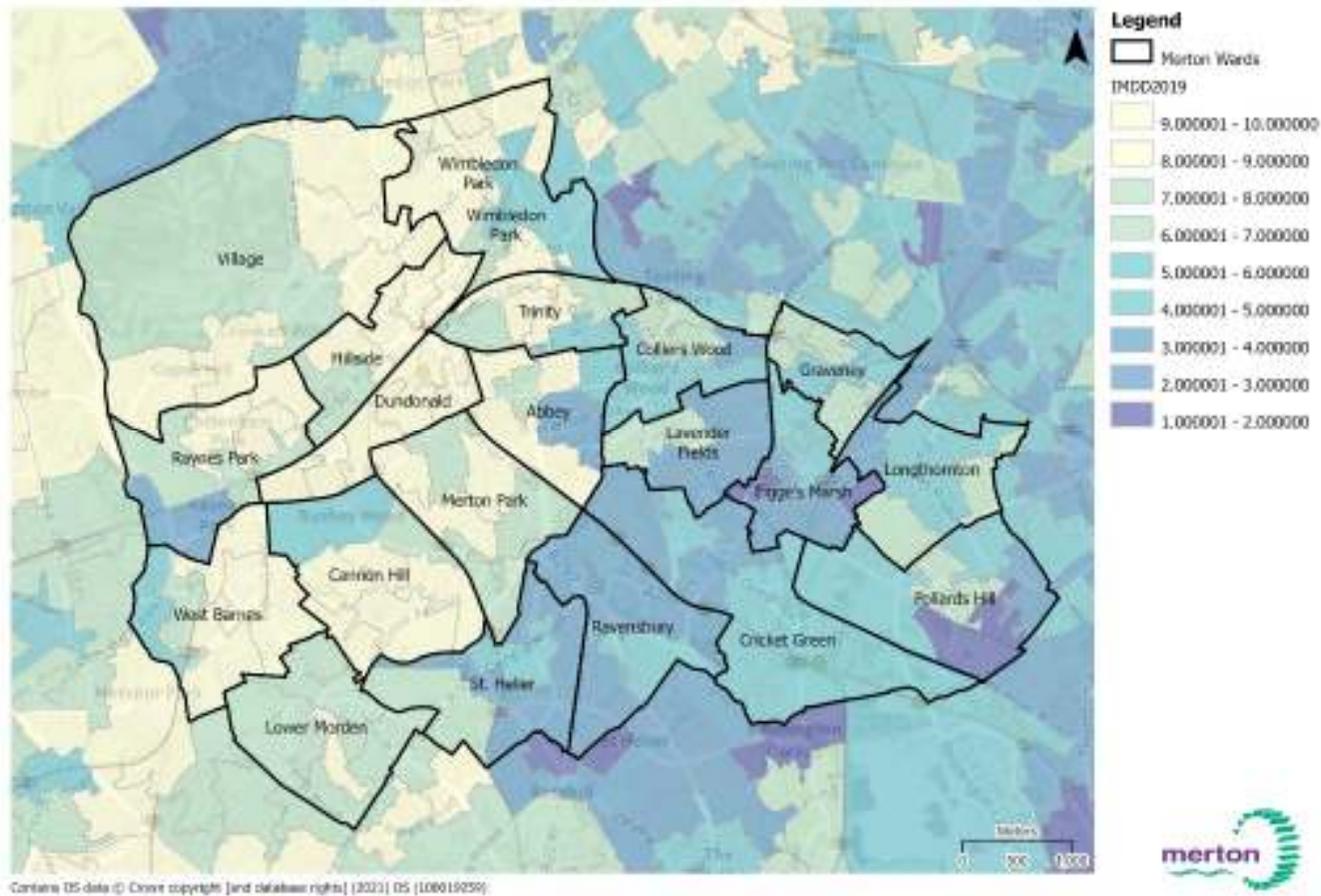
Religion



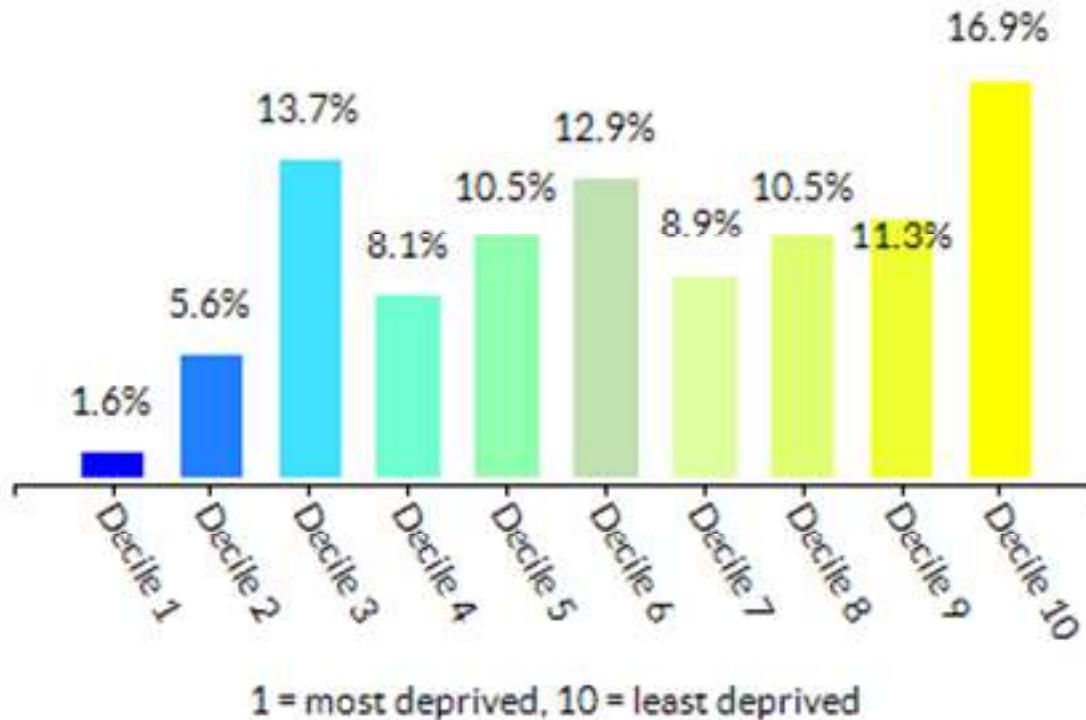
Source: ONS Census 2011

Index of Multiple Deprivation

- 8.44 The Index of Multiple Deprivation (IMD) combines information from seven domains to produce an overall relative measure of deprivation. The domains are: Income; Employment; Education; Skills and Training; Health and Disability; Crime; Barriers to Housing Services; Living Environment. Each domain is given a weighting and is based on a basket of indicators.

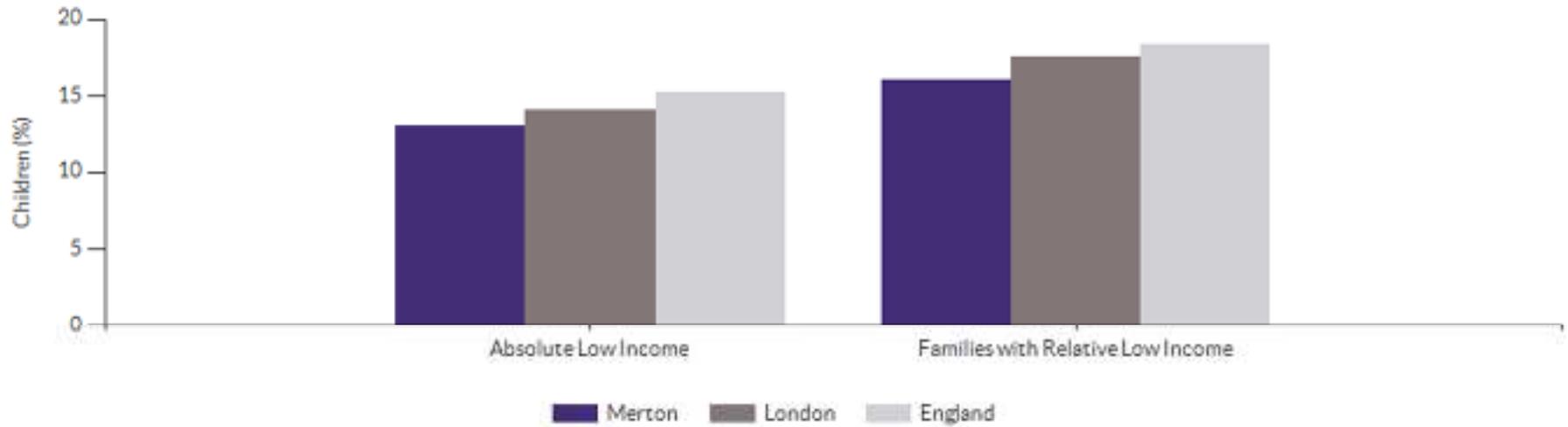


8.45 The Index of Multiple Deprivation (IMD) 2019 is the official measure of relative deprivation for small areas (or neighbourhoods) in England. The IMD ranks every small area (Lower Super Output Area) in England from 1 (most deprived) to 32,844 (least deprived). For larger areas we can look at the proportion of LSOAs (Local Super Output Areas) within the area that lie within each decile. Decile 1 is the most deprived 10% of LSOAs in England while decile 10 shows the least deprived 10% of LSOAs.



Date: 2019 Source: DCLG

Children in low income families

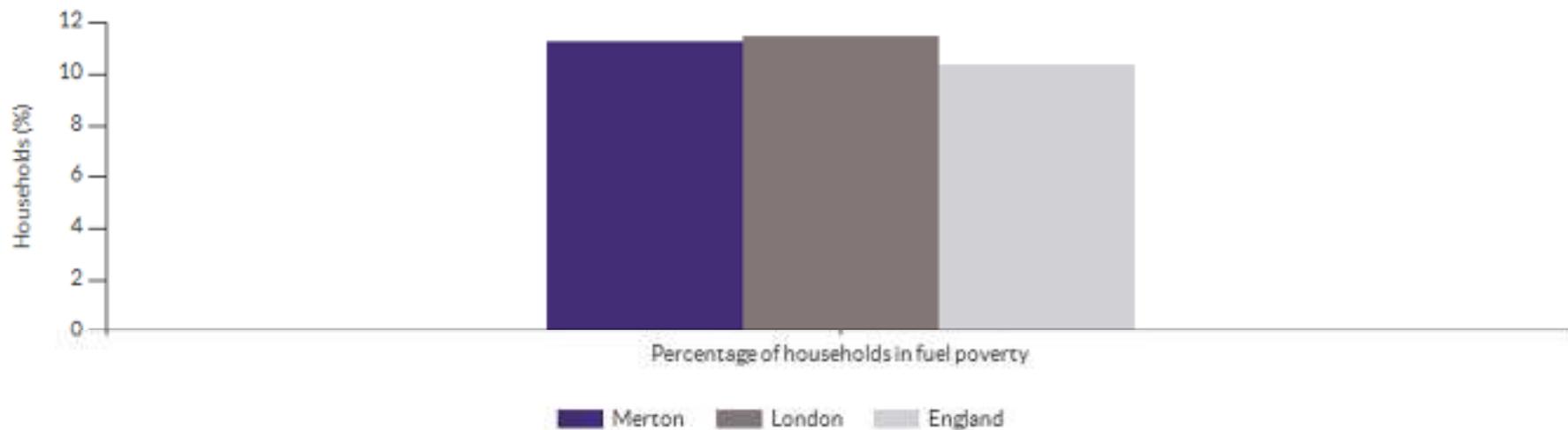


Date: 2018-2019 Source: DWP/ONS

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Feature	Percentage of Children U16 living in Families with Absolute Low Income 2018-2019 metadata	Percentage of Children U16 living in Families with Relative Low Income 2018-2019 metadata
Merton	13.1	16
London	14.1	17.6
England	15.3	18.4

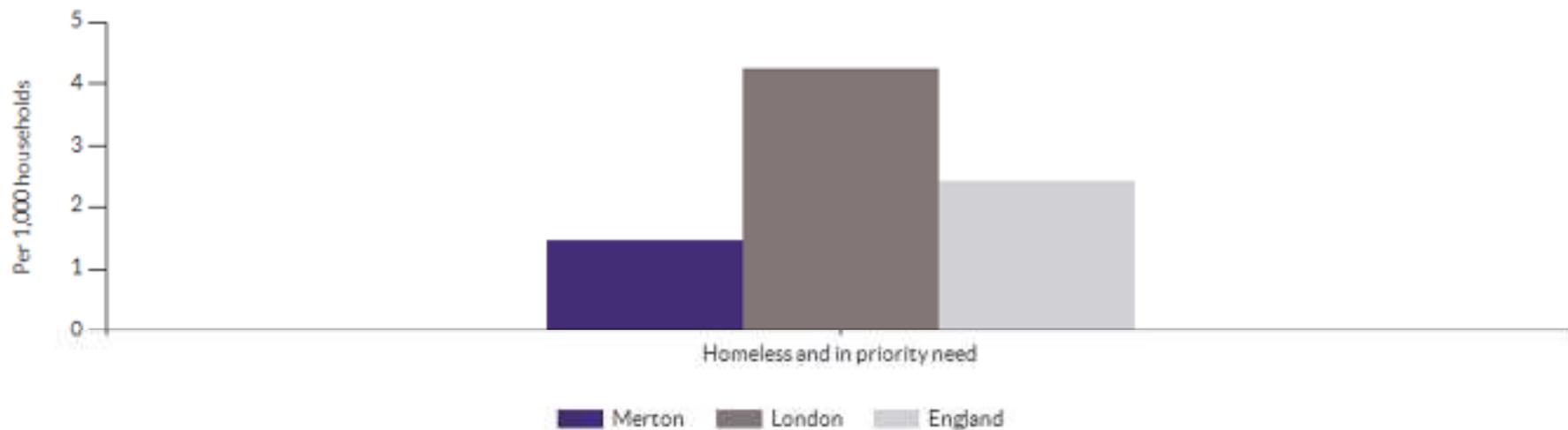
Fuel Poverty



Date: 2018 Source: BEIS

Merton	Merton	London	London	England	England	
Count	%	Count	%	Count	%	
Households in fuel poverty	9,282	11.2	391,924	11.4	2,400,297	10.3

Homelessness in Merton



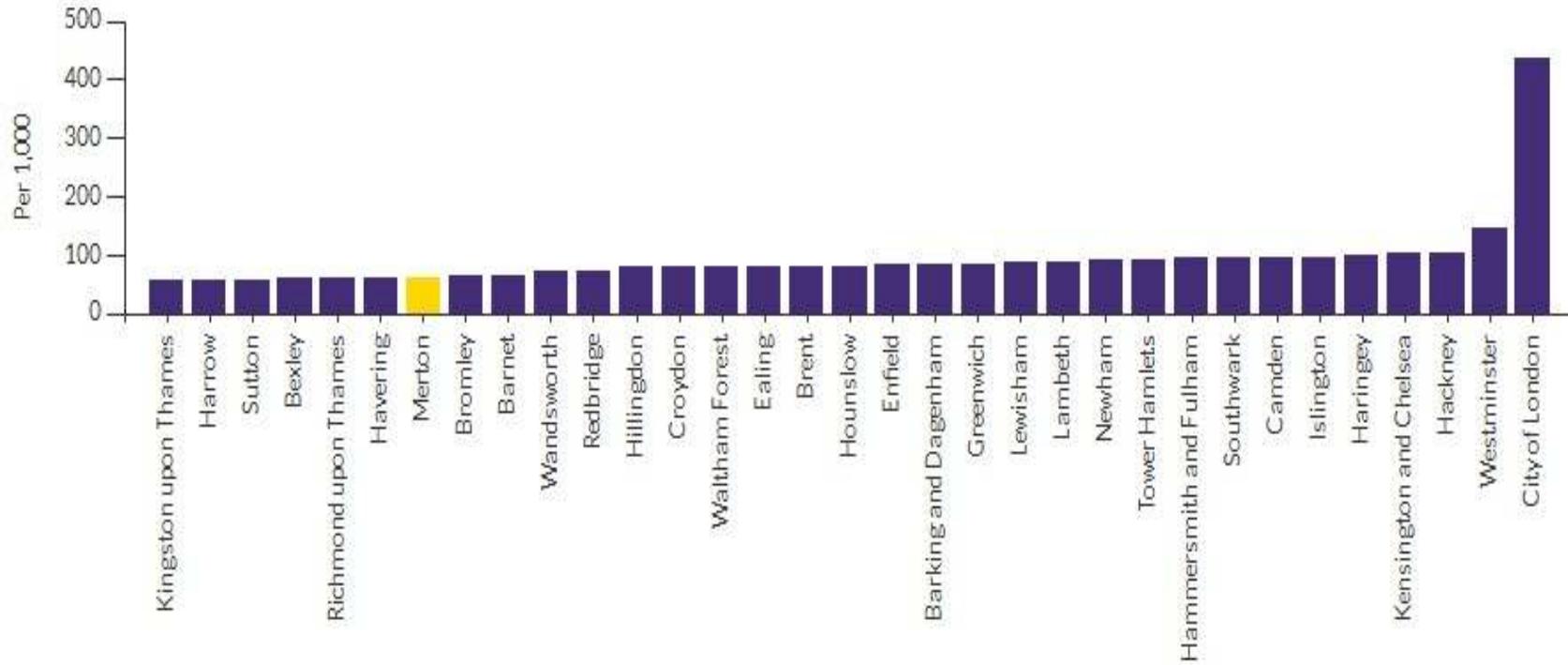
Date: 2017-2018 Source: MHCLG

Merton	Merton	London	London	England	England	
Count	Per 1,000	Count	Per 1,000	Count	Per 1,000	
Homeless and in priority need - per 1,000 households	122	1.4	15,440	4.2	56,580	2.4

Crime

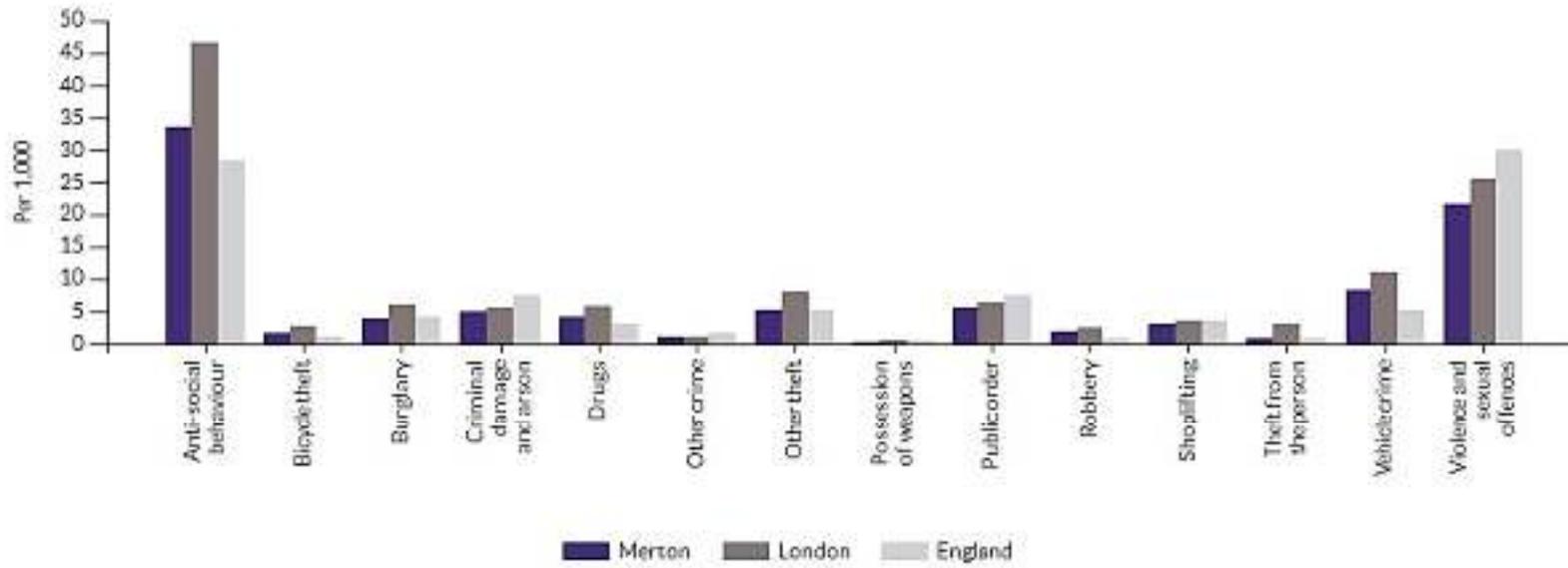
- 8.46 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing. This report displays data on overall crime and a breakdown of crime types for Merton. Single crime case data have been aggregated for Merton and rates are calculated per 1,000 population. 12-month rolling figures use an average of the population monthly figures over the same period. Where the dates for the crime data exceed the latest available date for population estimates, the latest population figure was used for any crime rates after that date (no extrapolating).
- 8.47 According to the 2017 Residents Survey the majority of residents feel safe in their local area both during the day (96%) and after dark (85%). Again, this compares favourably against national benchmarking. Almost all residents (93%) agree that their local area is a place where people from different ethnic backgrounds get on well together. This includes 38% who give the most positive response of definitely agree. Only 2% of all residents disagree that that people of different ethnic backgrounds get on well together. Furthermore, the survey found that Merton residents are satisfied with their local area as a place to live (92%). This is a positive finding and is 12% higher than the national benchmark of 80% (Local Government Authority polling Feb 17). These findings can then be broken down spatially and by gender, age group, and disability.
- 8.48 During the day, at least 9 in 10 within each of these groups feel safe, including all those interviewed in Dundonald / Trinity / Abbey and Ravensbury / St Helier / Cricket Green; After dark, Mitcham and Morden residents are significantly less likely, compared to Wimbledon, to feel safe (82% cf. 88%). It should be noted that the proportion feeling unsafe is similar for both constituencies (8% cf. 7%). The lower levels of perceived safety in Mitcham and Morden are driven chiefly by responses in Lavender Fields / Pollards Hill / Figge's Marsh, where 78% feel safe and 13% unsafe.
- 8.49 Female residents are also significantly less likely to feel safe after dark compared to male (80% cf. 90%), with 11% of female residents feeling unsafe at this time. By age group, residents aged 65+ are significantly less likely, compared to the average, to feel safe after dark (79%); however, this is driven by a higher volume of 'neither' responses from this group (14%). For each age group, 7% to 8% feel unsafe after dark. Disabled residents are significantly less likely to feel safe after dark compared to nondisabled residents (72% cf. 86%). Whilst this group is also more likely to feel unsafe (13% compared to 7% of non-disabled residents), this difference is not statistically significant.

Figure x: Overall crime rate by offences



Date: May-20 - Apr-21 Source: data.police.uk

Figure x; Crime rate by type of crime



Date: May-20-Apr-21 Source: data.police.uk

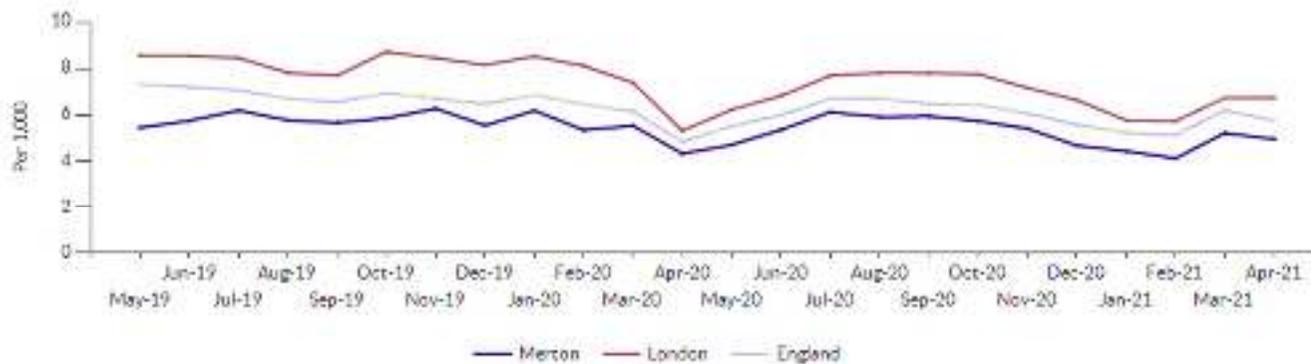
Figure; Crime by type of offences (count and percentage).

Offences	Merton	
	Count per 1000	%
Anti-social behaviour	6,952	33.7
Bicycle theft	370	1.8
Burglary	835	4
Criminal damage and arson	1,010	4.9
Drugs	842	4.1
Possession of weapons	90	0.4
Public order	1,121	5.4
Robbery	408	2
Shoplifting	621	3
Theft from the person	176	0.9
Other theft	1,104	5.3
Vehicle crime	1,721	8.3
Violence and sexual offences	4,456	21.6

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Public disorder and weapons	528	2.6
Violent crime	2,382	11.8
Other crime	210	1

Figure x: Overall crime rate change



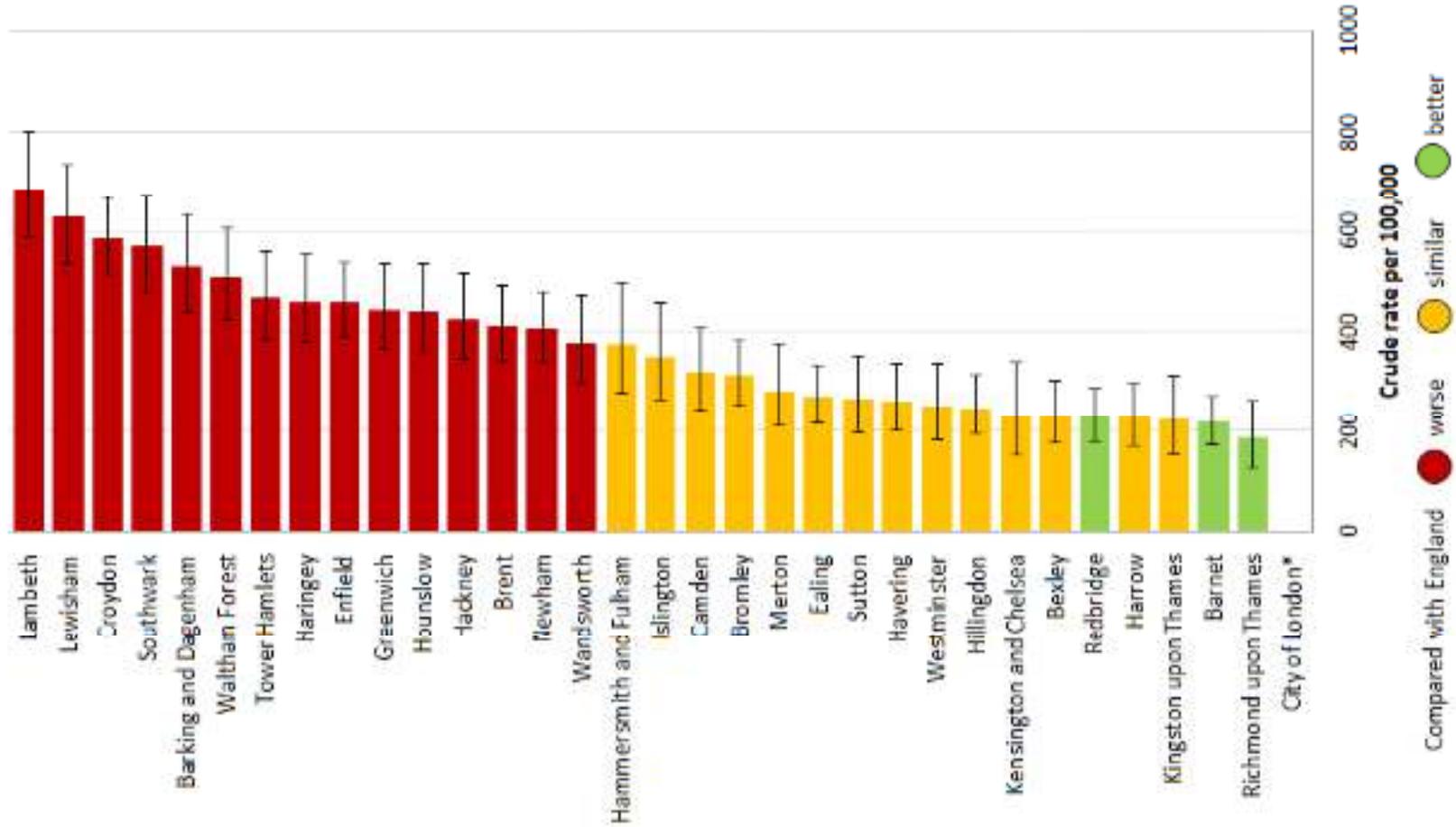
Source: data.police.uk

First time entrants to the youth justice system

- 8.50 Children and young people at risk of offending or within the youth justice system often have more unmet health needs than other children. This indicator is included to ensure that vulnerable children and young people (aged 10-17) at risk of offending, are included in mainstream planning and commissioning. Data are collected from the Police National Computer.
- In 2017, London had a significantly higher rate of first time entrants to the youth justice system – 380 compared to 293 per 100,000 residents in England.
 - The London rate has however fallen by more than half compared to baseline in 2010. Although this decrease had tapered off in recent years the rate for London fell by more than 7% compared to the previous year (2016).

- Only Richmond upon Thames (185 per 100,000), Barnet (218) and Redbridge (228) had a significantly lower rate than England.

Figure xx: First time entrants to the youth justice system by borough



* Not calculated due to small numbers

Transport infrastructure

Railway

- 8.51 Merton being in the south London sub region the borough relies on the rail network more than the underground network for commuting to London and surrounding areas. There are over 11 railway stations found in the borough, all linking to Wimbledon station which is the largest of the station in the borough. The average journey time from Wimbledon to central London (Waterloo Station) is 10-15 minutes.
- 8.52 Underground (tube) and tram
- 8.53 Merton has two underground lines services, the Northern Line and District Line, both terminating in the borough the Northern Line at Morden and the District Line at Wimbledon; with the northern line stations providing night service on Fridays and Saturday's. Both underground lines provide links to central London and other major London railway stations.
- 8.54 Within Merton a tram service runs from Wimbledon to Croydon, connecting the centre of the borough to the east. The tram service also has interchanges with the rail network at Wimbledon and Mitcham Junction station.
- 8.55 Bus
- 8.56 London Buses are operated by Transport for London (TfL), who manage the bus service in London, plan routes, specify service levels and monitor service quality. London Buses is also responsible for the siting of bus stops and other support services. Merton is served by 29 bus routes, 6-night bus services and 3 24-hour bus services serving the 3 main town centres in the borough.
- Public Transport Accessibility Levels (PTAL)
- 8.57 As with other outer London borough Merton has higher PTAL levels near and around the town centre of Wimbledon (PTAL of 6b, excellent), Morden (PTAL of 6a very good) and remaining range from PTAL of 4- 5 (good). Appendix 1 Maps identifies the PTAL in across Merton.

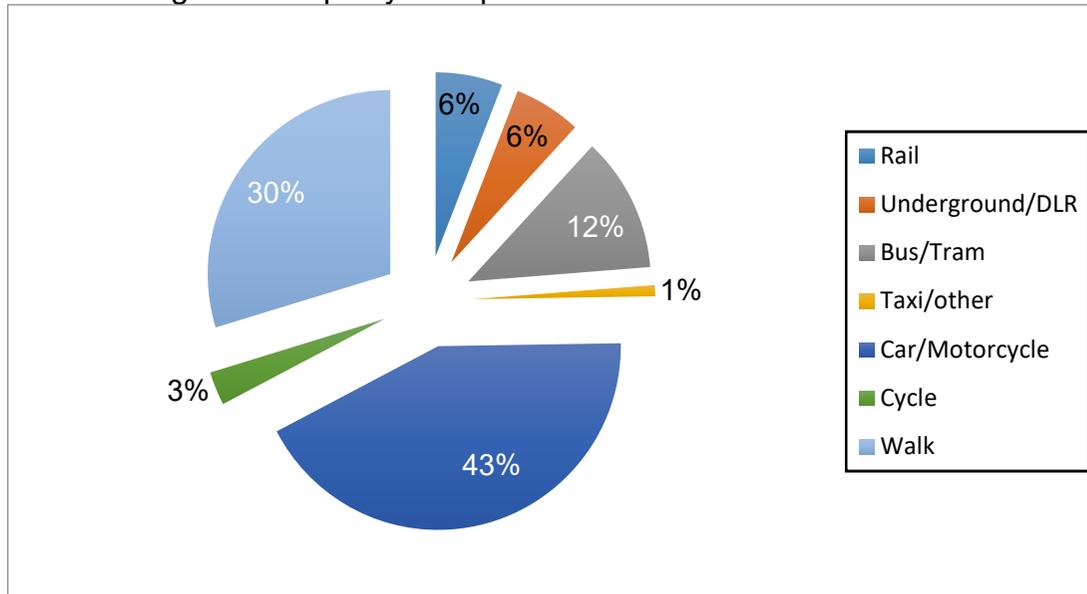
8.59 Merton has no motorway only a Trunk Road which is a small section of the A3, which along with the Red Route Network forms part of the Transport for London Road Network (TLRN) and is the responsibility of Transport for London (TfL).

8.60 Most roads in the borough are unclassified. However, 30 kilometres of classified A roads, 48 kilometres of classified B and C roads and 10 kilometres of TRLN. Certain roads in the borough have been designed as strategic routes and include major roads, which despite still being the responsibility of the borough, gives additional powers to the Mayor and TfL to work with local Boroughs to minimise disruption caused by road works.

Transport use patterns

8.61 In Merton the number of people who either walking, cycling or use public transport is around 58%, showing a falling trend compared to previous years (down from 61%). Merton's figure is just below the London average of 62%. All trips per day by main mode for the periods from 2014/15 to 2016/17.

Figure 44: trips by transport mode

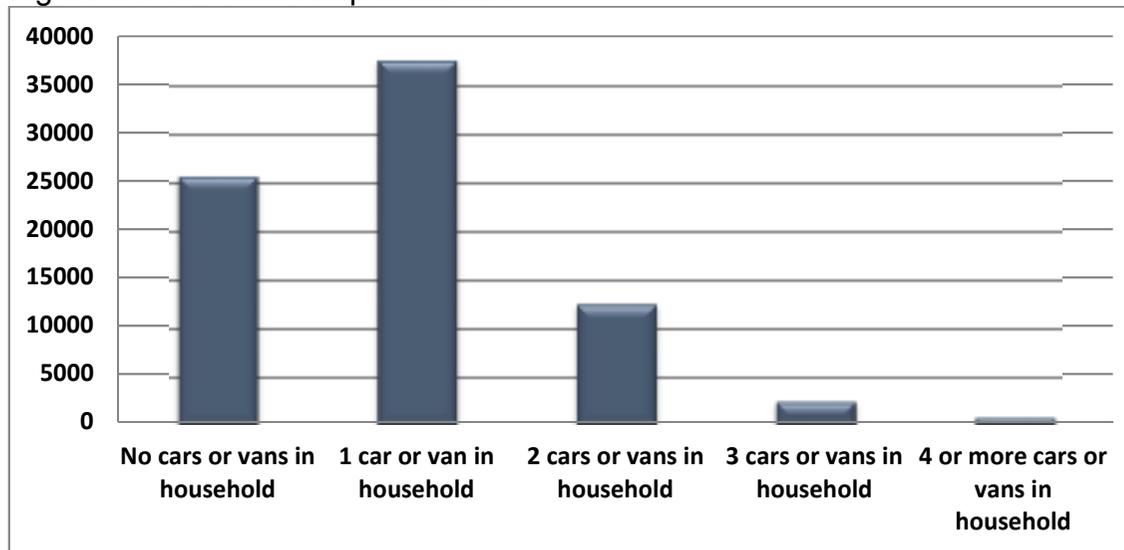


Source 2011 Census

Car ownership

8.62 As with other outer London boroughs the private car retains a leading role in meeting travel demand with around 43% of daily trips by car. There are currently around 78,497 cars in Merton or roughly one car per household. Car ownership is up from previous years. The highest car ownership can be found in Village Ward (1.4 cars per household) dropping to 0.7 car per household at the other end of the range. The areas with the highest car ownership generally coincide with areas of poor connectivity

Figure 45: Car ownership in Merton

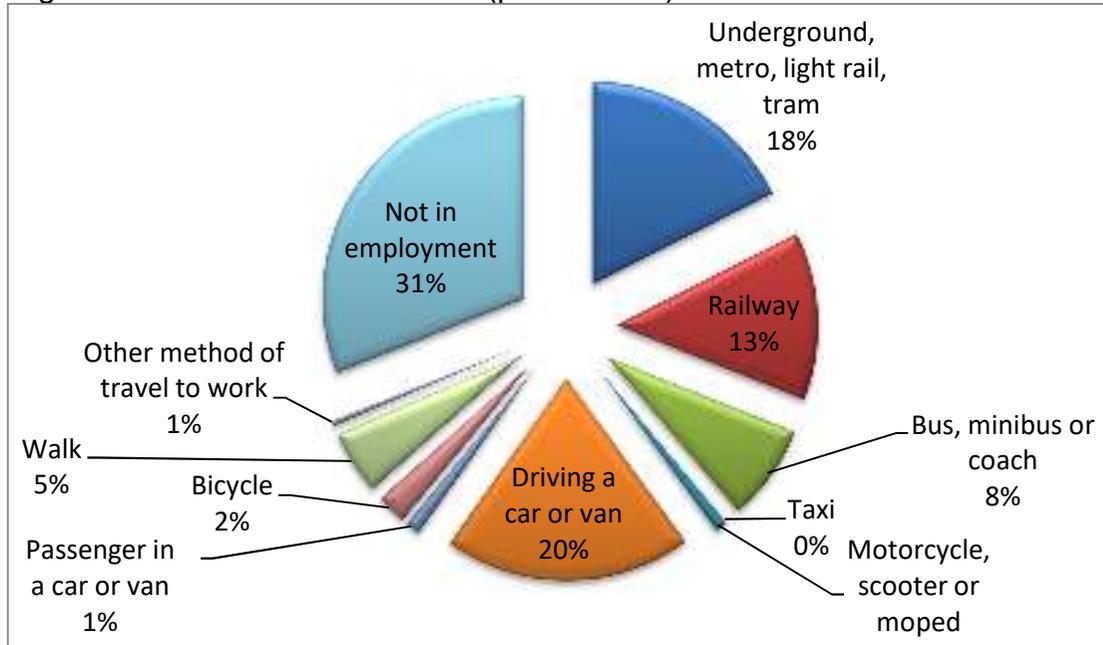


Source 2011 Census

8.63 Figures now shows that, an average of 32% of households have no car (2014/15 -2016/17) Local Demand Travel Survey data identified a slight decrease on previous years. However, this has been off-set by an increase in households with 2 or more cars (up to 18.6%).

Travel to work

Figure 46: Mode of travel to work (pre- COVID)



Source: Census 2011

8.64 Many roads are overcrowded during peak periods adding to air quality, noise and road safety concerns. This is perhaps supported by collision data, which suggests that rates are increasing for all vulnerable road user groups and cars for both KSI's and all collisions rising in 2016 compared to 2015 (see figure 4 below). Likewise, annual vehicle kilometres travelled is also increasing, albeit slowly.

Figure XX: Number of people killed, seriously injured, and slightly injured in road traffic collisions

	2012	2013	2014	2015	2016	2015 - 2016
No of people slightly injured	471	481	567	565	579	2%
No of people Killed or seriously injured	65	32	50	36	44	22%

Source: Merton road safety annual report

Economic baseline data

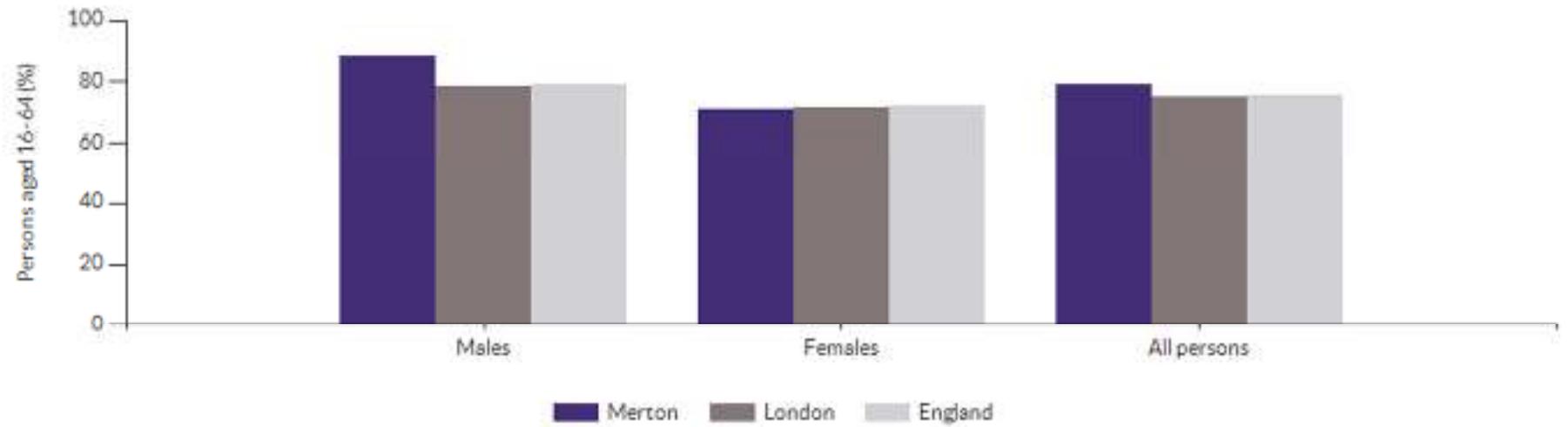
Employment and income

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Merton residents who are in active full time employment are distributed all over the borough however, unemployed residents are concentrated towards the east of the borough and self-employed residents tend to be concentrated toward the west of the borough.

Population projections identify a smaller increase in the working age population by 2025 than both the younger and the older populations. This is likely to mean increasing numbers of middle aged people coping with the competing demands of looking after both young children and older parents, as well as having implications for the comparative size of the future health and care workforce. Merton residents who are in active full time employment are distributed all over the borough however, unemployed residents are concentrated towards the east of the borough and self-employed residents tend to be concentrated toward the west of the borough.

Figure x; Employment rate in Merton

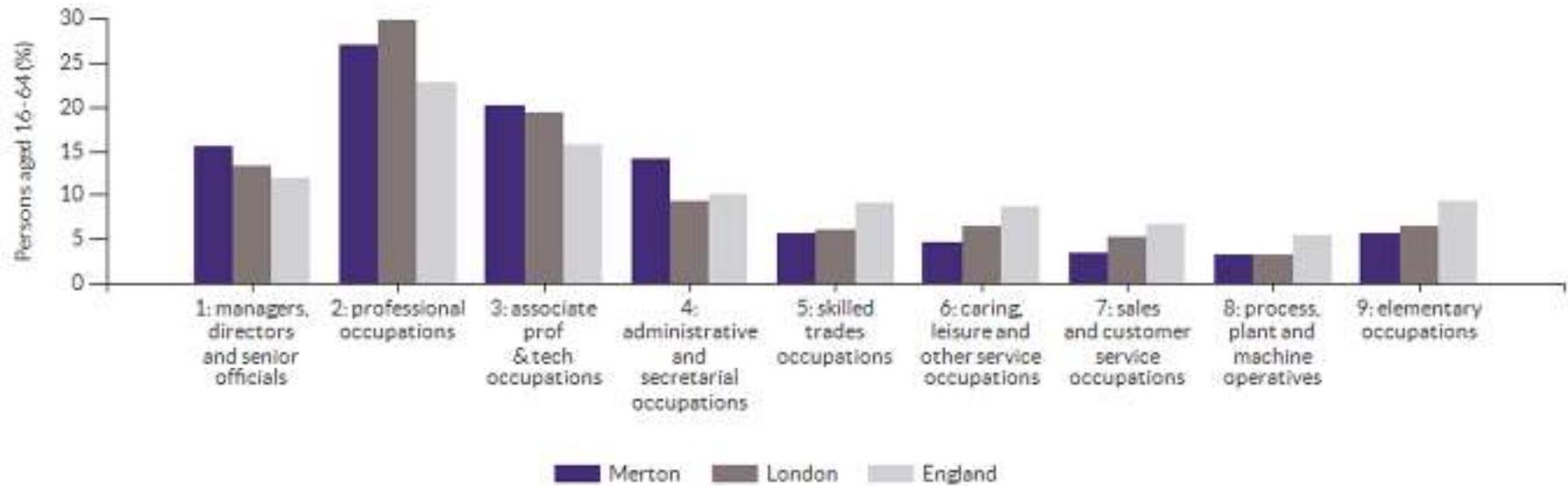


Date: 2020-12 Source: ONSAPS

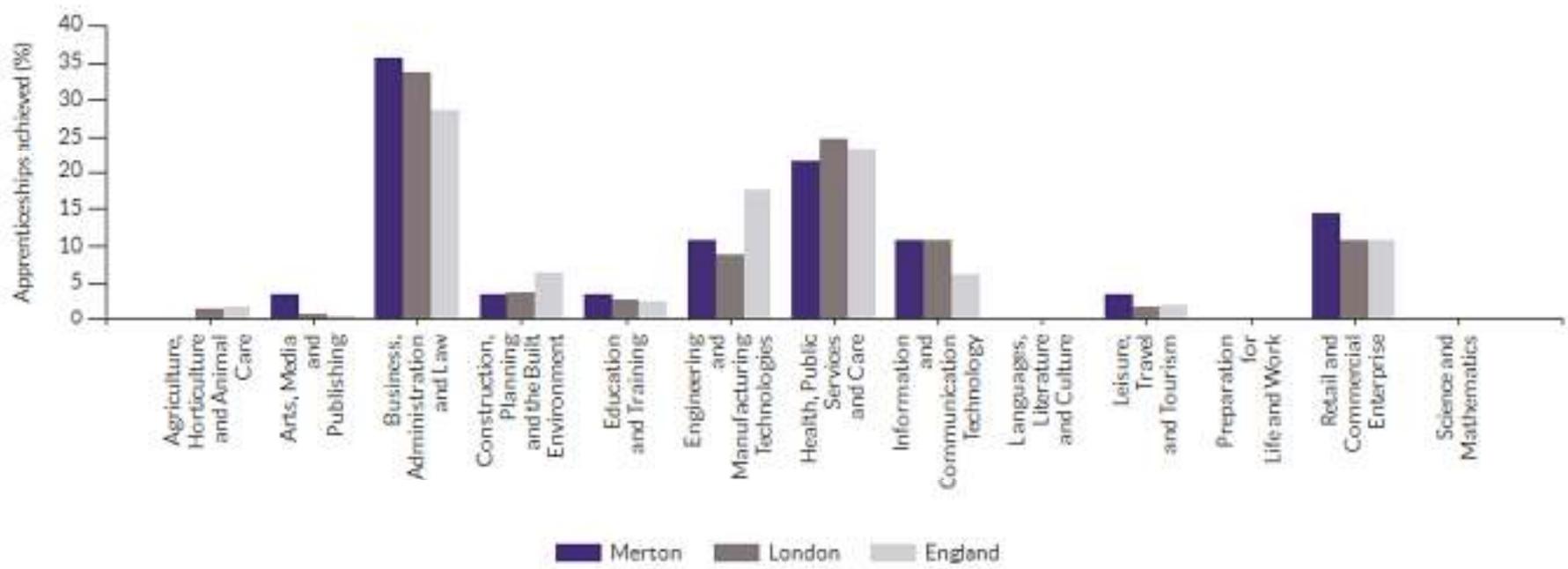
8.67 The top three industry of employment in Merton are as follows:

- 16% Admin and service support
- 15% managers, directors and senior officials
- 27% Professional, scientific and technical activities

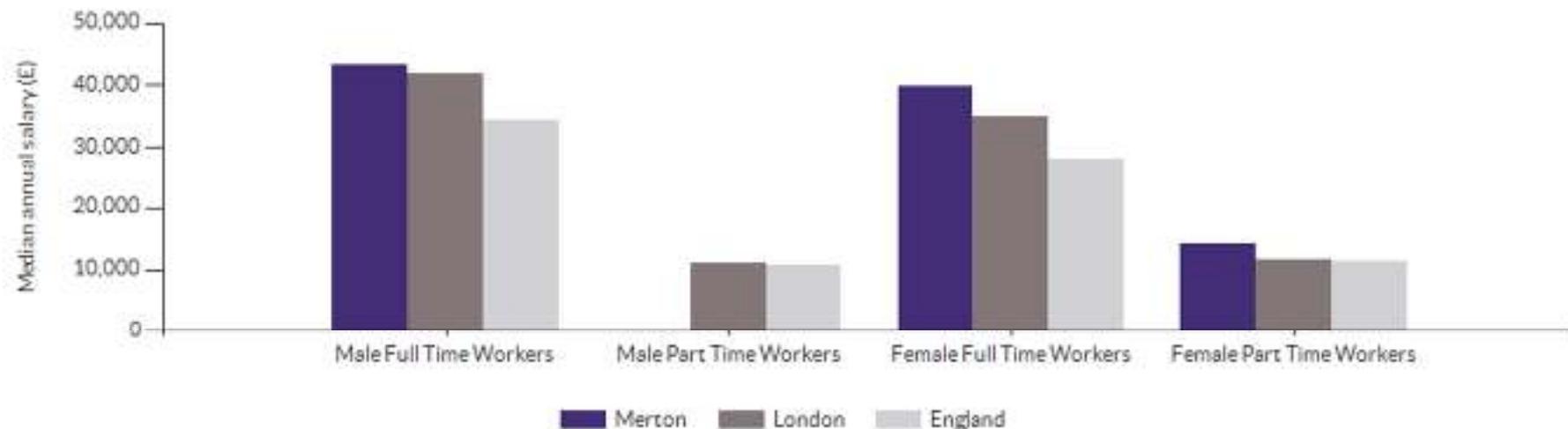
Figure x: employment sectors in Merton



Date: 2020-12 Source: ONSAPS



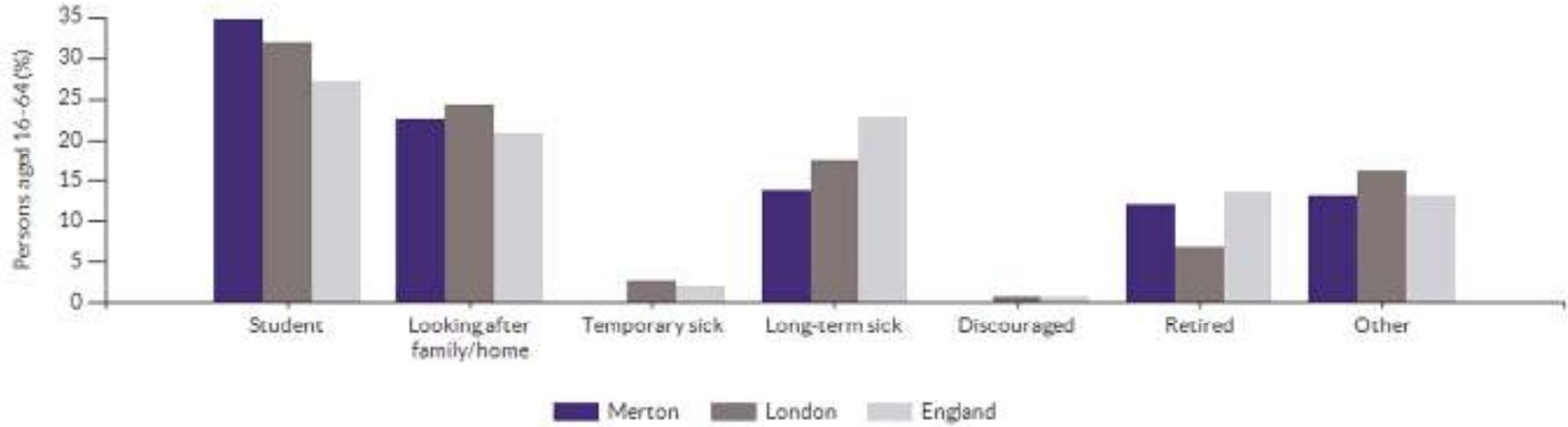
Date: 2019-2020 Source: DfE



Date: 2020 Source: ONSASHE

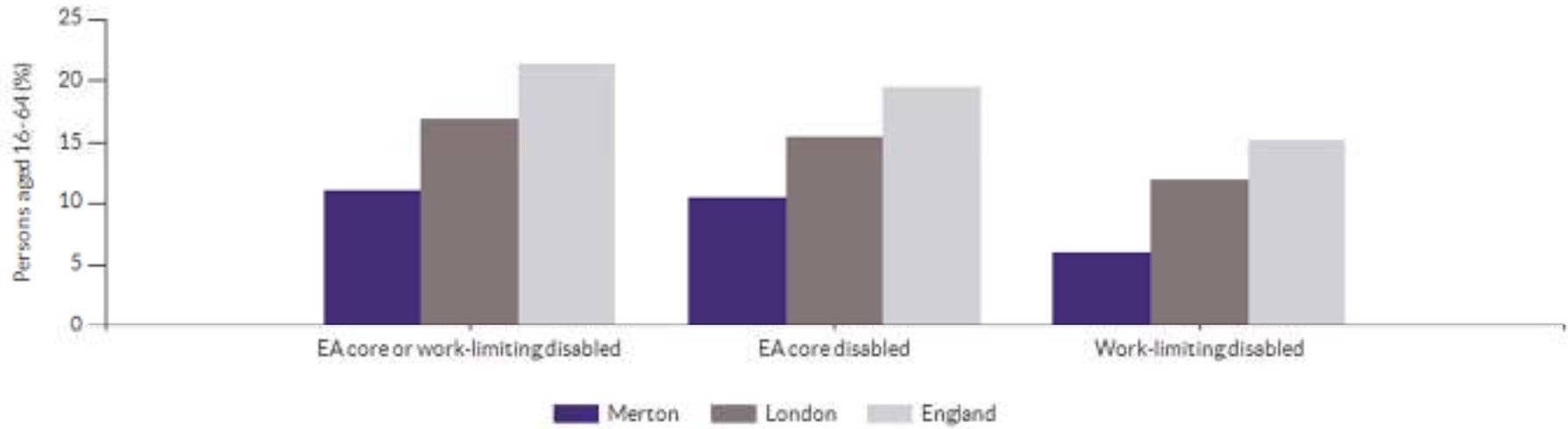
The Annual Survey of Hours and Earnings (ASHE) is conducted in April each year to obtain information about the levels, distribution and make-up of earnings and hours worked for employees. This data set provides information about earnings of employees who are living in an area, who are on adult rates and whose pay for the survey pay-period was not affected by absence. ASHE is based on a sample of employee jobs taken from HM Revenue & Customs PAYE records. Information on earnings and hours is obtained in confidence from employers. ASHE does not cover the self-employed nor does it cover employees not paid during the reference period

Figure x: Economic inactivity by reason



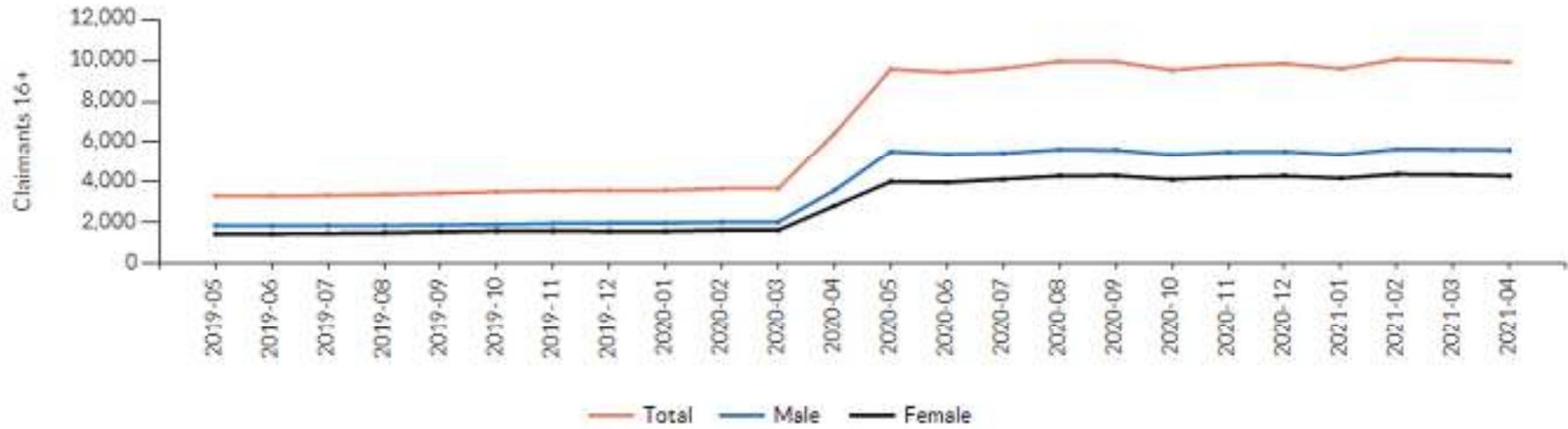
Date: 2020-12 Source: ONSAPS

Figure x: Disability (Equality Act) core level



Date: 2020-12 Source: ONSAPS

Figure x: Monthly claimant counts



Source: ONS

Appendix C: Proposal Map changes

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