

The London Borough of Merton
Soundness Self Assessment Checklist
Estates Local Plan
March 2017

Contents

Introduction 3

Test of Soundness at examination 3-54



planning advisory service

1 Introduction

- 1.1 This document sets out the council's soundness PAS self assessment for the Merton's Estates Local Plan hereby referred to as the 'Plan'. In summary – the key requirements of plan preparation are:
- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
 - Is the plan justified?
 - Is it based on robust and credible evidence?
 - Is it the most appropriate strategy when considered against the alternatives?
 - Is the document effective?
 - Is it deliverable?
 - Is it flexible?
 - Will it be able to be monitored?
 - Is it consistent with national policy?

2 The Tests of Soundness at

Examination 2.1 The starting point for the examination is the assumption that the council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria. The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182) *'The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is*

sound. A local planning authority should submit a plan for examination which it considers is sound. The specific matters for the test for soundness are set out in the subheading below.

Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

- 2.2 This means that the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF has 12 principles through which it expects sustainable development can be achieved.

Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

- 2.3 This means that the Plan should be based on a robust and credible evidence base involving:
- Research/fact finding: the choices made in the plan are backed up by facts.
 - Evidence of participation of the local community and others having a stake in the area; and
 - The Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability

appraisal. The Plan should show how the policies and proposals help to ensure that the *social, environmental, economic* and resource use objectives of sustainability will be achieved.

Effective: deliverable over its period based on effective joint working on cross boundary Strategic priorities

2.4 This means the development plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.
- The development plan should be flexible and able to be monitored.

2.5 The Plan should indicate who is to be responsible for making sure that the policies and proposals happen and

when they will happen. The Plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals.

2.6 Although, it is important that policies are flexible, the plan should make clear that major changes may require a formal review including public consultation. Any measures which the council has included to make sure that targets are met should be clearly linked to an annual Authority Monitoring Report (AMR).

Consistent with national policy: enabling the delivery of sustainable development

2.7 The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion. The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared.

Table 1: Test of Soundness Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p>		
<p>Vision and Objectives</p> <p>Has the council clearly identified what the issues are that the Plan is seeking to address?</p> <p>Have priorities been set so that it is clear what the Plan is seeking to achieve?</p> <p>Does the Plan contain clear vision(s) and objectives which are specific to the place?</p>	<p>Sections of the Plan and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</p> <p>Relevant sections of the Plan which explain how policies derive from the objectives and are designed to meet them.</p> <p>The strategic objectives of the Plan, and the commentary in the Plan of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</p>	<p>Yes, Part 2 (Background) of the Plan and Part 3 (Analysis and Planning Policies) for each estate clearly sets out the issues that the Plan is seeking to address.</p> <p>Yes, Priorities setting out clearly what the Plan is seeking to achieve are detailed in Part 2 (Background) of the Plan which includes the borough's strategic objectives (from Merton's Core Planning Strategy); urban design principles and key drivers, which includes the case for regeneration. Additionally Part 3 (Analysis and Planning Policies) includes an identification of opportunities informed by a detailed site analysis of each estate.</p> <p>Clear visions which are specific to each estate in addition to an overarching vision underpinning the Plan are contained in Part 2 of the Plan. The vision for each estate is supported by both a short statement expanding on the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the Plan?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p>	<p>Sections of the Plan which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</p> <p>Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</p>	<p>vision (page 28) diagrams and images illustrating the vision.</p> <p>Yes there is a direct relationship between the identified issues, vision and objectives as set out in Part 2 and 3 of the Plan. This includes a figure on page 29 of the Plan which illustrates the relationship between the objectives and the Plan's vision. For part 3, the second on each estate is called (e.g.) "Eastfields: analysis and planning policies" and summarises the issues and opportunities prior to the policy areas. There are no policy gaps.</p> <p>Yes. Part 5 of the plan sets out which specific policies will meet the strategic objectives of the Plan and how the policies will be delivered and implemented.</p> <p>The SA/SEA shows how different options were appraised. It also explains how different alternatives were examined and why the preferred policies were chosen. Given the issues the policy is seeking to address and the range of evidence, the submission policy strikes the most appropriate balance. Reasonable alternatives were identified and considered as part of Merton's Sustainability Appraisal incorporating</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the Plan explain how its key policy objectives will be achieved?</p>	<p>Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each Plan showing how they combine to provide a coherent policy structure.</p>	<p>Strategic Environmental Assessment including which included justification of the preferred option for each estate.</p> <p>Yes, the Plan policies are internally consistent both in terms of the policies within it and with all other adopted plan policies that the Plan, upon adoption will sit alongside. The table in Section 5 shows how the Core Strategy objectives align with the plans policies</p> <p>In the case of this Estates Local Plan the objectives are set within the 15-year lifetime of the Plan. This is because the delivery timescale of the regeneration of each estate will be driven by the needs of existing residents to be rehomed, land assembly and other practicalities associated with the demolition and reconstruction of residential areas. The Estates Local Plan visions and objectives could be delivered by a whole site proposal or by a series of phased schemes over several years.</p> <p>Yes, the Plan explains how its key policy objectives will be achieved in Part 5 (Delivery, Implementation and Monitoring) of the Plan.</p>
<p>The presumption in favour of sustainable development (NPPF paragraphs 6-17)</p>	<p>An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible</p>	<p>Chapter two <i>Key drivers</i>- set out the council's positive approach to presumption in favour of sustainable</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</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>approach to delivery (see 'Section 3 Effective', below).</p> <p>An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</p> <p>Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area).</p>	<p>development in accordance with the NPPF.</p> <p>Part 2 including key drivers and case for regeneration help to set out how and why the preferred overall strategy and plan area distribution of development were arrived at. This is supplemented by the evidence base (e.g. the SA/SEA and the Housing Market Assessment and other examination library documents which can be found on the Council's website via the following link:</p> <p>www.merton.gov.uk/estatesplan</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the</p>	<p>A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)</p>	<p>As set out in Part 2 of the Plan,(page 16) it reflects and accords with presumption in favour of sustainable development in accordance with the NPPF.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
presumption should be applied locally.		
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<p>Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</p> <p>Technical papers demonstrating how the aspirations and objectives of the Plan are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</p>	<p>Yes. The Plan contributes towards addressing the economic, social and environmental needs of the borough; and is considered justified by the comprehensive body of supporting evidence which includes:</p> <ul style="list-style-type: none"> • SA/SEA • Visual impact study- Oct 2016 • Case for regeneration- Oct 2016 • Wandsworth, Merton, Sutton and Croydon Strategic Flood Risk Assessment - 2017 • Site housing needs - Feb 2015 (SD • <i>Socio-economic analysis - Jan 2015 (SD24 SD34 SD42)</i> • Urban design reviews - Feb 2015 (Easfields), Oct 2014 (High Path), March 2015 (Ravensbury). (SD25 SD SD35 SD43) • Condition Survey & lifecycle cost analysis – June 2016 (SD29 SD37)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p><i>SD48)</i></p> <ul style="list-style-type: none"> •Housing market assessment – March 2017 (<i>SD12)</i>
<p>NPPF Principles: Delivering sustainable development</p>		
<p>Building a strong, competitive economy (paragraphs 18-22)</p>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21).</p>	<p>Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</p>	<p>The Plan seeks to positively contribute towards implementing the vision and objectives of the London Plan and Merton's Strategic Objective 4: (set of in Merton's Core Planning Strategy)</p> <p>Strategic objective 4: To make Merton more prosperous with strong and diverse long term economic growth.</p> <p>As the Plan is generally for residential regeneration over three specific estates, it does not on its own deliver a clear economic vision</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<p>A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</p>	<p>As the Estates Local Plan is for residential regeneration over three specific estates and sits alongside the borough wide Core Planning Strategy</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</p>	<p>and Sites and Policies Plan, it does not duplicate the policies within these. The Council introduced its own CIL on 1st April 2014 to ensure the delivery of infrastructure in the Borough. The council also manages the implementation of projects identified on the Regulation 123 list. Additionally contributions may be secured by planning/and or highway legal agreement(s) where works on site, or in the vicinity are necessary to mitigate the impact of development, or to enable the delivery of the site.</p> <p>The Plan provides the opportunity to improve the building fabric, pavements and roads, drains, street lighting, parks and landscaping of each area to create attractive sustainable neighbourhoods</p> <p>The Plan, supports policies within Merton's Core Planning Strategy policies that set out the strategic approach to meeting identified needs for the economy and employment in the Borough such as policy CS12 (Economic Development). Policies E4, H4 and R4 (Land use) of the Plan,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>acknowledge that whilst the predominant land use for the estate as residential is to be retained, major development proposals will be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of development and in the resultant end use.</p>
Ensuring the vitality of town centres (paragraphs 23-37)		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<p>The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</p>	<p>The Plan largely concerns the regeneration of the land use for the estate which will remain predominately residential. The three estates are within walking distance of designated town centres.</p> <p>A key principle of the Plan is for new developments to connect easily with its surroundings and include well connected street layouts that encourage walking and cycling as well as allowing for convenient and clear vehicular access.</p> <p>A number of the Plan's policies (e.g. policies EP E3,H3 and R3 (Movement</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		and Access), seek to improve or create better pedestrian and cycle routes, access and movement to nearby facilities and amenities, including town centres
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23	An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. Primary and secondary shopping frontages identified and allocated.	Merton's adopted Sites and Policies Plan sets out Merton's site allocations. The Estates Local Plan covers three existing housing estates and proposes their allocation as a regeneration area, where the land use will remain predominately residential . Merton's adopted Policies Map will be updated to include this regeneration area, upon adoption of the Estates Local Plan.
Supporting a prosperous rural economy (paragraph 28)		Not applicable to Merton.
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.	Not applicable to Merton.
Promoting sustainable transport (paragraphs 29-41)		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29))</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport</p>	<p>Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</p> <p>Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</p> <p>A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</p> <p>Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</p> <p>If local (car parking) standards have been prepared, are they justified and necessary? (39)</p> <p>Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</p>	<p>The London Plan and Merton Core Planning Strategy and Sites and Policies Plan include policy requirements concerning the promotion of sustainable transport.</p> <p>The Plan embodies Merton's Core Planning Strategic Objectives including:</p> <ul style="list-style-type: none"> • Strategic objective 5: To make Merton a healthier and better place for people to live and work in or visit. • Strategic objective 6: To make Merton an exemplary borough in mitigating and adapting to climate change and to make it more attractive and green place. • Strategic objective 7: To make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning journeys. <p>Merton's Sites and Policies Plan policies DM T1 to DM T5 and transport proposals 01TN to 24T; provide detailed</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p>		<p>policies to complement the Core Planning Strategy (transport polices CS18 to CS20).</p> <p>Merton's Policies Map identifies Merton's transport network, sustainable transport network and transport network improvements.</p> <p>The Plan embodies and accords with Merton's adopted Local Plan. Its vision <i>includes the creation of sustainable well designed safe neighbourhoods.</i></p> <p>Policies within the Plan seek to facilitate and encourage the use of sustainable transport modes and include EP E2, H2 and R2 (Street Network) and EP E3, H3 and R3 (Movement and Access).</p> <p>In addition to retention of the predominant residential land use, the Plan's policies EP, E4, H4 and R4 (Land Use) encourage the provision of existing non-residential uses such as community facilities, open spaces. Subject to meeting relevant Local Plan policies the Plan encourages the provision of additional non-residential uses. The Plan expects major new developments to provide employment opportunities during the construction</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>phases and in the resulting end use.</p> <p>The Plan requires parking provision for development proposals to be in accordance with the London Plan (as amended), taking account of specific local conditions and requirements. Policies EP E6, H6 and R6 (Environmental Protection) requires development proposals to be accompanied by a working method statement and construction logistics plan.</p>
Supporting high quality communications infrastructure (paragraphs 42-46)		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and</p>	<p>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</p>	<p>Not relevant to this Plan.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
existing development. (44)		
Delivering a wide choice of high quality housing (paragraphs 47-55)		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<p>Identification of:</p> <p>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</p> <p>Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</p> <p>A SHLAA</p>	<p>The Plan accords with Merton's Core Planning Strategy Strategic Objective 3: <i>To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.</i></p> <p>The Plan contains three housing led regeneration site proposals which will contribute towards the maintenance of a rolling supply of deliverable sites sufficient to provide five years worth of housing against Merton's housing requirements, including the 5% buffer provision. According to the latest figures from Clarion Housing the three site proposals will contribute a total of 1,516 homes over the 15 year plan period.</p> <p>Performance and delivery against Merton's Housing target is annually monitored and published in Merton's Authority Monitoring Report (AMR). This includes a housing trajectory which demonstrates how Merton meets its five</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>year rolling supply of deliverable sites and the additional 5% buffer.</p> <p>The current trajectory contained in Merton's AMR 2015/16 (Draft), which includes Merton's five year supply, indicates that the projected net additional homes per year will exceed not only the minimum target of 411 homes per annum; but also the 5% buffer.</p> <p>It also indicates based upon proposed phasing details provided by Clarion Housing, the three developable site proposals are likely to contribute to Merton's housing supply from 2018/ 19 to 2029/30. Therefore the contribution from these proposals could help deliver housing over the short, medium and long term (i.e. from year 3 to15).</p> <p>The Pan London GLA SHLAA (2014) to which Merton contributed in preparing, sets out an annual housing target for London of 42,389 for the period 2015-2025, of which Merton's share is 411 additional homes per annum.</p> <p>Since February 2017 the council has been working on a significant amount of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>housing research to support the emerging London Plan, including a Strategic Housing Land Availability Assessment (SHLAA) and a Strategic Housing Market Assessment (SHMA) with the 32 other boroughs and the GLA. The SHLAA is due to be published in Autumn 2017 and the SHMA in mid-2017</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<p>Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</p>	<p>Merton's Sites and Policies Plan identifies a supply of developable sites for years 6-10.</p> <p>The current trajectory contained in Merton's AMR 2015/16 (Draft), includes the Plan's three developable site proposals. Based upon proposed phasing details provided by Clarion Housing, the three site proposals are likely to contribute to Merton's housing supply from 2018/ 19 to 2029/30. Therefore the contribution from these proposals could help deliver housing over the short, medium and long term (i.e. from year 3 to15).</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<p>A housing trajectory</p> <p>Monitoring of completions and permissions (47)</p> <p>Updated and managed SHLAA. (47)</p>	<p>Merton's Housing Trajectory is published annually in the Authority Monitoring Report (AMR). It includes assessment and illustration of the expected rate of housing delivery through a trajectory, The current AMR demonstrates an eight year supply of new homes</p>
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<p>Policy on the density of development.</p>	<p>London Plan policy 3.4 <i>Optimising Housing Potential</i> particularly table 3.2 housing densities is part of the statutory development plan for Merton and helps guide local densities. The Mayor's Housing SPG provides extensive guidance on delivering this policy. Consideration of densities is also set out in the Housing Market Assessment for the Estates Local Plan.</p> <p>The strategic objectives of Merton's Core Planning Strategy are embodied in the Plan including:</p> <p>Strategic Objective 3: To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.</p> <p>Strategic Objective 8: to promote a high</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough.</p> <p>The Plan includes urban design principles which sets out broad design parameters that development proposals will be expected to adhere to in order to achieve the highest standards of design. One such principle includes density and the expectation that the London Plan density matrix should be used flexibly with other relevant criteria to determine an appropriate density for each estate that ensures high quality design.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<p>Policy on planning for a mix of housing (including self-build, and housing for older people</p> <p>SHMA</p> <p>Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</p> <p>Evidence for housing provision based on up to date, objectively assessed needs. (50)</p> <p>Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what</p>	<p>Merton's housing mix requirements are set out in Core Planning Strategy policies CS 8: <i>Housing Choice</i> and CS 9 :(<i>Housing Provision</i>) and Sites and Policies Plan policy DM H3: <i>Support for Affordable Housing</i> and Sites and Polices Plan policies DM H2: <i>Housing mix</i>, DM H5: <i>Student housing, other housing with shared facilities and bedsits</i>.</p> <p>The Plan accords with Merton's adopted Local Plan policies and supporting</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>extent do they contribute to the objective of creating mixed and balanced communities. (50)</p>	<p>paragraphs 3.64, 3.170 and 3.271 of policies E6, H6 and R6 (Land Use) which combination with the Core Strategy London Plan and Sites and Policies Plan, proposals will be expected to contribute to the provision of a greater choice and mix of housing types, sizes and tenures, including affordable housing to meet the needs of all sectors of the community.</p> <p>However, it should be noted that the three site proposals within the Plan, due to their relatively modest size, cannot be regarded as housing market areas. Additionally a significant element of addressing assessed needs will be to address the housing needs of the existing housing estate residents. This is set out in further detail in Merton's Housing Market Assessment for the Estates Local Plan 2017 (SD12) and Eastfield Estate Housing Need Study (SD23) High Path Estate Housing Need Study (SD33) and Ravensbury Estate Housing Need Study (SD41). The Estates Local Plan does not duplicate housing policies already contained in the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>rest of the local plan document.</p> <p>Since February 2017 the council has been working on a significant amount of housing research to support the emerging London Plan, including a Strategic Housing Land Availability Assessment (SHLAA) and a Strategic Housing Market Assessment (SHMA) with the 32 other boroughs and the GLA. The London SHLAA is due to be published in Autumn 2017 and the London SHMA in mid- 2017.</p> <p>Evidence for housing based on up to date objectively assessed needs is included in the:</p> <p>GLA SHMA (2013)</p> <p>Merton HMA (2017)</p> <p>The GLA consider that London should be defined as a housing market area in its own right due to the complex interactions between boroughs and across the Greater London Area. It is clear that the increase in homes enabled by the Estates Local Plan will help Merton meet its share of London's</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		housing need, identified by the most recent London wide HMA as 42,000 to 49,000 new homes per annum.
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</p> <p>Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</p> <p>Examples of special circumstances to allow new isolated homes listed at para 55.</p>	Not applicable to Merton
Requiring good design (paragraphs 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paragraphs 59-61, linked to the vision for the area and specific local issues	All of the eight estate-specific policies within the Plan are design-led and provide robust and comprehensive site specific policies that set out the quality of development that will be expected for each estate informed by robust site analysis, Merton's Strategic Objectives and the Plan's vision. The Plan also includes urban design principles which clearly outline a set of broad principles in order to achieve the highest standards

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		of design, quality and inclusive design.
Promoting healthy communities (paragraphs 69-77)		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<p>Inclusion of a policy or policies on inclusive communities.</p> <p>Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>The Plan's policies and the Urban Design Principles seek to create safe accessible environments that promote community interaction.</p> <p>The Plan is informed by detailed site analysis, including identification of issues, constraints and opportunities for each estate.</p> <p>The Plan has been assessed and influenced by a Health Impact Assessment which looked at wider determinants of health including accessibility of environments, safety and quality of life.</p> <p>Relevant policies of the Plan include:</p> <p>EP E1, H1 & R1 (Townscape)</p> <p>EP E2, H2 & R2 (Street network)</p> <p>EP E3, H3 & R3 (Movement and</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>access)</p> <p>EP E4, H4 and R4 (Land Use)</p> <p>EP E5, H5 & R5 (Open space).</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<p>Inclusion of a policy or policies addressing community facilities and local service.</p> <p>Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>	<p>Policies EP E4, H4 & R4 (Land use) and EP E5, H5 & R5 (Open space) provide more detail to compliment the overall strategy for community uses set out in the Core Strategy policy CS11 (Infrastructure) and the requirements of Sites and Policies DM 1 (Community facilities) and C2 (Education for children and young people).</p> <p>Whilst policies EP E4, H4 & R4 (Land use) seek to retain the predominant existing land use as residential, appropriate non-residential uses are also encouraged, to ensure the re-provision of existing non-residential uses or to support employment, community activities and street vibrancy.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<p>Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</p> <p>A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions.</p>	<p>The Plan embodies the following Core Strategy objectives:</p> <p>Strategic objective 2: <i>To promote social cohesion and tackle deprivation by</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>(74)</p> <p>Protection and enhancement of rights of way and access. (75)</p>	<p><i>reducing inequalities.</i></p> <p>Strategic objective 5: <i>To make Merton a healthier and better place for people to live and work in or visit.</i></p> <p>Strategic objective 6: <i>To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place.</i></p> <p>The Plan's policies EP E5, H5 and R5 (Open space) compliments and accords with the overall strategy for open spaces set out in the Core Planning Strategy Policy CS13: Open Space, Nature Conservation, Leisure and Culture, which refers to the relevant up to the date local evidence documents (Merton Open Space Study 2011 and Merton's Playing Pitch Study 2011).</p> <p>Policies EP E5, H5 and R5 policies seeks to protect and improve open spaces including those which incorporate sport and recreational facilities.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify</p>	<p>Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is</p>	<p>Other documents in Merton's Local Plan (Merton's Core Planning Strategy CS16,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<p>prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</p>	<p>Merton’s Sites and Policies Plan 2014, policy DM.O1 and the London Plan 2016) all protect designated open spaces. Re-designation of Local Green Space will be considered as part of Merton’s borough-wide Local Plan 2017 and may also include parts of the three estates, should development phases be completed and new open spaces identified that merit residents’ protection.</p>
<p>Protecting Green Belt land (paragraphs 79-92)</p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt</p>	<p>Where Green Belt policies are included, these should reflect the need to:</p> <p>Enhance the beneficial use of the Green Belt. (81)</p> <p>Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</p> <p>Specify that inappropriate development should not be approved except in very special circumstances. (87)</p> <p>Specify the exceptions to inappropriate development (89-90)</p> <p>Identify where very special circumstances might apply to renewable energy development. (91)</p>	<p>Not applicable to Merton.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>		
Meeting the challenge of climate change, flooding and coastal change (paragraphs 93-108)		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<p>Planning of new development in locations and ways which reduce greenhouse gas emissions.</p> <p>Support for energy efficiency improvements to existing building.</p> <p>Local requirements for a building's sustainability which are consistent with the Governments' zero carbon buildings policy. (95))</p>	<p>The Plan embodies Core Planning Strategy, Strategic objective 1: To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively, and Strategic objective 6: To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place and also Core Strategy policies CS15 (Climate change) and CS16 (Flood risk management).</p> <p>The plan also embodies policies 5.1 (Climate change mitigation), 5.2</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(Minimising Carbon Dioxide emissions), 5.3 (Sustainable design & construction), 5.9 (Overheating and cooling), 5.12 (Flood risk management) and 5.13 (Sustainable Drainage) of the London Plan.</p> <p>Policies EP E6, H6 and R6 (Environmental protection) of the Plan, compliment and accord with Merton's Core Planning Strategy, in the adoption of strategies to mitigate and adapt to climate change taking full account of flood risk and water supply demand considerations.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<p>A strategy and policies to promote and maximise energy from renewable and low carbon sources,</p> <p>Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</p> <p>Identification of where development can draw its energy supply</p>	<p>The Plan embodies Core Planning Strategy, Strategic objective 1: <i>To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively, and</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</p>	<p>Strategic objective 6: <i>To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place</i>; in addition to Core Strategy policy CS15 (Climate change), and Sites and Policies Plan policy DM EP1.</p> <p>The Estates Local Plan also embodies policies 5.2 (Minimising Carbon Dioxide emissions), 5.6 (Decentralised energy in development proposals) and 5.7 (Renewable energy) of the London Plan.</p> <p>Policies EP E6, H6 and R6 (Environmental protection) of the Plan, compliment and accord with Merton's Core Planning Strategy and the Sites and Policies Plan, in the adoption of strategies to increase the use and supply of low carbon energy sources..</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<p>Account taken of the impacts of climate change. (99)</p> <p>Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</p> <p>Policies to manage risk, from a range of impacts, through suitable adaptation measures</p>	<p>The Plan embodies Core Planning Strategy, Strategic objective 1: <i>To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively, and</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Strategic objective 6: <i>To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place</i>; in addition to Core Strategy policy CS15 (Climate change), and Sites and Policies Plan policy DM EP1.</p> <p>The plan also embodies policies 5.9 (Overheating and cooling), 5.12 (Flood risk management) and 5.13 (Sustainable Drainage) of the London Plan.</p> <p>Policies EP E6, H6 and R6 (Environmental protection) of the Estates Local Plan, compliment and accord with Merton’s Core Planning Strategy and the London Plan, in the adoption of strategies to mitigate and adapt to climate change - taking full account of flood risk and water supply demand considerations.</p> <p>Policies DM F1 (Environmental protection) of the Sites and Policies Plan, compliment and accord with Merton’s Core Planning Strategy, in the adoption of strategies to mitigate and adapt to climate change taking full account of flood risk and water supply</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		demand considerations.
Take account of marine planning (105)	<p>Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</p> <p>Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</p> <p>Integrate as appropriate marine policy objectives into emerging policy</p> <p>Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</p>	Not applicable to Merton
Manage risk from coastal change (106)	<p>Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas and clarity on what development will be allowed in such areas.</p> <p>Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</p>	Not applicable to Merton
Conserving and enhancing the natural environment (paragraphs 109-125)		
Protect valued landscapes (109)	<p>A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</p> <p>Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the</p>	<p>The Plan embodies the following objectives of the Core Planning Strategy:</p> <p>Strategic objective 2: To promote social cohesion and tackle deprivation by</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>landscape and scenic beauty of National Parks, the Broads and AONBs.</p>	<p>reducing inequalities.</p> <p>Strategic objective 5: To make Merton a healthier and better place for people to live and work in or visit.</p> <p>Strategic objective 6: To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place.</p> <p>Policies EP E6, H6 and R6: (Environment protection) of the Plan accord and compliments these Core Planning Strategy objectives and policy CS13 (Open space, nature conservation, leisure and culture).</p> <p>Policies EP E7, H7 and R7 (Landscape) of the Plan aim to create, protect, enhance and manage networks of biodiversity and green infrastructure.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<p>Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</p>	<p>The Plan embodies Core Planning Strategy, Strategic objective 5: 'To make Merton a healthier and better place for people to live and work or visit, and Core</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Strategy policy CS15 (Climate change).</p> <p>The estates Local Plan also embodies policies 7.14 (Improving air quality) and 7.15 (Reducing and managing noise...) of the London Plan.</p> <p>Policies EP E6, H6 and R6 (Environmental protection) of the Estates Local Plan, compliment and accord with Merton's Core Planning Strategy and the London Plan, in the adoption of strategies to prevent unacceptable risks from pollution.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiveristy (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<p>Identification and mapping of local ecological networks and geological conservation interests.</p> <p>Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</p>	<p>Strategic objective 8: To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough.</p> <p>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, which has potential to be of local importance. Development proposal that could have an impact on the geological features of this site should</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>have regard to London Plan.</p> <p>The following policies in the Plan EP E6, EP H6 and EP R6 all seek to plan positively for biodiversity.</p>
Conserving and enhancing the historic environment (paragraphs 126-141)		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<p>A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</p> <p>A map/register of historic assets</p> <p>A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</p>	<p>Strategic objective 8: To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough.</p> <p>Merton's Policies Map identifies historic assets in the borough.</p> <p>The following policies provide detailed estate specific policies for each estate: EP E2, EP H2, EP H3, EP H8, EP R1, EP R2 and EP R6.</p>
Facilitating the sustainable use of minerals (paragraphs 142-149)		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; land banks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within</p>	<p>Not applicable to Merton</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	
<p>Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a Plan needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p>Participation</p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>Evidence is provided by way of Merton's Statement of Consultation (<i>SD8</i>).</p>
<p>Research / fact finding</p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date and how convincing is it?</p> <p>What assumptions were made in preparing the Plan? Were they reasonable and</p>	<p>The studies, reports and technical papers that provide the evidence for the policies set out in the Plan, the date of preparation and who they were produced by.</p> <p>AND</p> <p>Sections of the Plan (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</p>	<p>Several locally prepared evidence papers have been used to shape and support the Plan. These are available to view via the full Examination evidence library and include:</p> <p>Overarching vision</p> <ul style="list-style-type: none"> • London Plan 2016 and Mayor's Housing SPG 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
justified?	<p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues rose during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the Plan).</p>	<ul style="list-style-type: none"> • Merton Authority Monitoring Report (MP5) • Merton’s Core Planning Strategy (2011) (MP2) • Economic Development Strategy (2010 and 2012 update and included an action plan) (MP13) • Merton Housing Strategy (2012-2015) (MP16) • Merton’s Tenancy Strategy (2013) (MP17) • Submission Sustainability Appraisal (2016 and 2017 (SD2 and SD5) • Estates Local Plan Housing Market Assessment (SD12) • Borough Character Study (2013) (MP9) • Duty to Co-operate Statement (2017) (SD9) • Representaitons received at Stages 1-3 (see Statement of Consultation(SD8) <p>In addition to the above, specifically for Eastfields estate</p> <ul style="list-style-type: none"> • Eastfields Estate: Visual Impact Study (2016) • Eastfields Estate: Case for regeneration (2016) • Eastfields Estate: Case for regeneration (2015) • Eastfields Estate: Housing Needs

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Study (2015)</p> <ul style="list-style-type: none"> • Eastfields Estate: Socio-economic Analysis (2015) • Eastfields Estates: Urban Design Review (2016) • Eastfields Estate: Sound Insulation Test Report (2014) • Eastfields Estate: Structural Engineers Report (2014) • Eastfields Estate: Thermographic Survey Report (2014) • Eastfields Estate: Condition Survey Report and Life Cycle Cost Analysis (2016) <p>Specific to High Path Estate (see Exam library for dates and authors)</p> <ul style="list-style-type: none"> • Council site and historical analysis as set out in the Estates Local Plan • High Path Estate: Visual Impact Study (2016) • High Path Estate: Case for regeneration (2016) • High Path Estate: Case for regeneration (2015) • High Path Estate: Housing Needs Study (2015) • High Path Estate: Socio-economic Analysis (2015) • High Path Estate: Urban Design Review (2014) • High Path Estate: Existing Building

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Conditions (2014)</p> <ul style="list-style-type: none"> • High Path Estate: Condition Survey Report and Life Cycle Cost Analysis (2016) <p>Specific to Ravensbury Estate (see exam library for authors)</p> <ul style="list-style-type: none"> • Council site and historical analysis as set out in the Estates Local Plan • Ravensbury Estate: Visual Impact Study (2016) • Ravensbury Estate: Case of Generation (2016) • Ravensbury Estate: Case of Generation (2015) • Ravensbury Estate: Housing Needs Study (2015) • Ravensbury Estate: Socio-economic Analysis (2015) • Ravensbury Estate: Urban Design Review (2015) • Ravensbury Estate: Asbestos Refurbishment/Demolition Survey (2014) • Ravensbury Estate: Existing Stock Refurbishment Appraisal (2016) • Ravensbury Estate: Structural Assessment Report of Orlit Houses Revision A (2014) • Ravensbury Estate: Structural

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Assessment Report of Ravensbury Grove Flats (2014)</p> <ul style="list-style-type: none"> Ravensbury Estate: Condition Survey Report and Life Cycle Cost (2016)
<p>Alternatives</p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the Plan from the start?</p>	<p>Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</p> <p>An audit trail of how the evidence base, consultation and SA have influenced the plan.</p> <p>Sections of the SA Report showing the assessment of options and alternatives.</p> <p>Reports on how decisions on the inclusion of policy were made.</p> <p>Sections of the consultation document demonstrating how options were developed and appraised.</p> <p>Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</p>	<p>The consultation documents at Stage 1 (SD50) and Stage 2 (SD49) and the sustainability appraisal (particularly section 7 in SD2 and SD5) set out what alternatives were considered, why these were rejected and how the Plan was influenced. The Statement of Consultation (SD8) provides alternative options from the public and officer's response and actions following the comments made. The council decision report in November 2016 found as an appendix to the Legal Compliance (SD11) also sets out the decision making and how alternatives were considered before recommending submission of the Estates Local Plan</p>
<p>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. To be 'effective' a</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Plan needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the Plan? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the Plan explain how its key policy objectives will be achieved? 	<p>Sections of the Plan which address delivery, the means of delivery and the timescales for key developments and initiatives.</p> <p>Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</p> <p>Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each Plan showing how they combine to provide a coherent policy structure.</p> <p>Section in the Plan that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</p>	<p>Yes. The policies meet Merton's Local Plan objectives and vision. In addition the vision of the Plan. This is illustrated in appendix 1 of the Plan.</p> <p>In accordance with NPPF and nation PPG the council should not repeat information already contained in part of the local plan as the purpose of this plan is to complement the part of the Local Plan that was recently adopted.</p> <p>Yes. The council believes the policies are internally consistent with Merton's Local Plan</p> <p>The Estates Local Plan delivery, monitoring and implementation chapter (section 5) sets out how the policy objectives will be achieved.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Confirmation from the relevant agencies that they support the objectives and the identified his information was provided in the Core Planning Strategy Table 27.2 'Infrastructure projects', which was found 'sound' and subsequently adopted by the council.</p> <p>The Plan does have regard to other plans/strategies from other agencies/bodies for example the Environment Agency, Thames Water and the NHS. At each stage of consultation the council has seek stakeholder views, comments and advice.</p> <p>In accordance with the NPPF and PPG the council should not repeat information already contained in part of the local plan. As the purpose of this plan is to complement the part of the Local Plan that was recently adopted (namely the Core Planning Strategy and the Site and Policies Plan)</p> <p>Merton's Local Development Scheme (2016) (MP6).</p> <p>The council updates and monitors</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		progress in the LDS timetable in its annual Authority Monitoring Report (MP5).
<p>Infrastructure Delivery</p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>A section or sections of the Plan where infrastructure needs are identified and the proposed solutions put forward.</p> <p>A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</p> <p>Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</p> <p>Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</p>	<p>Clarion Housing Group represents the major landowner and delivery lead for the Plan. The council cannot deliver the Plan's vision and objectives alone.</p> <p>It is envisaged that the delivery programme will cover a period of 10 – 15 years and will occur over several phases. The build out and operational phases of the development will be lead by Clarion Housing Group</p> <p>Where the provision or re-provision of necessary engineering and social infrastructure needs to be provided within the site boundaries the delivery of these facilities will be secured by means of planning conditions or obligations as appropriate.</p> <p>The Viability of the Plan is demonstrated</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		in the Viability Study (<i>SD16</i>)
<p><i>Co-ordinated Planning</i></p> <p>Does the Plan reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p>Sections of the Plan that reflect the plans or strategies of the local authority and other bodies</p> <p>Policies which seek to pull together different policy objectives</p> <p>Expressions of support/representations from bodies responsible for other strategies affecting the area</p>	<p>Since the commencement of Merton's Local Plan Merton has worked with key stakeholders, developers and the community to form strategic polices, a spatial vision and policies that are locally specific to Merton.</p> <p>For the Plan the council consulted the public, stakeholders and other interested parties on the development of the Plan including and has considered all representations received.</p> <p>The submission version of the Plan has been informed by local and partnership evidence work, local research and feedback from the public, stakeholder and advisory bodies.</p> <p>This is set out in the Consultation Statement (<i>SD8</i>) which is submitted as evidence supporting the Plan for the three estates identified within the Plan.</p>
<p><i>Flexibility</i></p>	<p>Sections of the Plan setting out the assumptions of the plan and identifying the circumstances when policies might need to be</p>	<p>The Plan is inherently flexible, setting out the design parameters for each site</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> Is the Plan flexible enough to respond to a variety of, or unexpected changes in, circumstances? Does the Plan include the remedial actions that will be taken if the policies need adjustment? 	<p>reviewed.</p> <p>Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <p>the effectiveness of policies and what evidence is being collected to undertake this</p> <p>changes affecting the baseline information and any information on trends on which the Plan is based</p> <p>Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p> <p>Sections within the Plan dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</p> <p>Sections of the Plan identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.</p>	<p>in an estate specific vision delivered by a series of eight policies plus design requirements for all development. The actual detailed schemes can be worked up flexibly under these parameters. Policies such as affordable housing, quantum of playspace and open space etc are found elsewhere in Merton's Local Plan.</p> <p>Part 5 of the Estates Local Plan (SD1): delivery implementation and monitoring sets out the strategic objective, policy, method of delivery and implementation, indicator, target and contingencies</p> <p>The Plan will be regularly reviewed against the most recent version of the council's Authority Monitoring Report to ensure that the development supports the council wide targets, particularly on housing delivery.</p>
<p>Co-operation</p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken 	<p>A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were</p>	<p>The council has consulted with neighbouring boroughs, Clarion Housing Group and the GLA family consistently during the plan preparation period</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>appropriately for the plan being examined?</p> <ul style="list-style-type: none"> Is it clear who is intended to implement each part of the Plan? Where the actions required are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<p>reached and why.</p> <p>The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</p>	<p>Merton's Duty to Co-operate (SD9) shows the level of consultation that the council has undertaken.</p> <p>The Statement of Consultation (SD8) shows the different consultation methods that were used.</p>
<p>Monitoring</p> <p>Does the Plan contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the Plan contains housing allocations)?</p> <p>Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</p> <p>Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the on-going monitoring of the implementation of the</p>	<p>Sections of the Plan setting out indicators, targets and milestones</p> <p>Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</p> <p>Reference to any other reports or technical documents which contain information on the delivery of policies</p> <p>Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the Plan against the sustainability appraisal</p>	<p>The Plan will be regularly reviewed against the most recent version of the council's Authority Monitoring Report (MP5) to ensure that the development supports the council wide targets.</p> <p>Part 5 of the Estates Local Plan (SD1): delivery implementation and monitoring sets out the strategic objective, policy, method of delivery and implementation, indicator, target and contingencies.</p> <p>The Authority Monitoring Report Section 4 sets out the housing targets and housing trajectory. Sections 6 and 7 contain Biodiversity and Conservation</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>plan, through the annual monitoring report?</p>		<p>Management, Transport and Public Realm targets</p> <p>The sustainability appraisal report and the equalities impact assessment (SD2 and SD5) contain sections on the specific estates, targets and indicators and an assessment of risks relating to each policy area (e.g. transport, air quality, flood risk etc)</p>
<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>The Plan should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> Does the Plan contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? Does the Plan contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<p>Sections of the Plan which explain where and how national policy has been elaborated upon and the reasons.</p> <p>Studies forming evidence for the Plan or, where appropriate, other information which provides the rationale for departing from national policy.</p> <p>Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</p> <p>Where appropriate, evidence of consistency with national marine</p>	<p>The council believe that all the policies are consistent with the National Planning Policy Framework and its guidance national Planning Practice Guidance (PPG).</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>policy as articulated in the UK Marine Policy Statement</p> <p>Reports or copies of correspondence as to how representations have been considered and dealt with.</p>	

2 Planning policy for traveller sites

2.6 Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document. The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

2.7 Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

2.8 In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (paragraph 6)		Policy CS10 in Merton's Core Planning Strategy Planning for traveller sites, will remain in place as part of the council's Local Plan.
Early and effective community engagement with both settled and traveller communities.	Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	<p>The council's evidence base "accommodation needs assessment of gypsies and travellers was extensively examined at the Sites and Policies Plan examination in 2014 and the Sites and Policies Plan (MP3) including its statement on planning for gypsies and travellers was found sound.</p> <p>As set out in the Duty to Co-operate (SD.9) Merton has already organised liaison with five neighbouring boroughs, meeting in 2016 to co-operate on cross boundary gypsy and traveller evidence base.</p>
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<p>Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</p> <p>Collaborative working with neighbouring local planning authorities.</p> <p>A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</p>	<p>As set out in the Housing Market assessment (SD12) for the Estates Local Plan, Merton has considered the provision of low density forms of housing such as caravan pitches as part of the Estates Local Plan (notwithstanding the Sites and Policies Plan 2014 statement and evidence that need can be met on existing traveller sites in Merton) but has discounted it as undeliverable given the priority need to rehouse existing residents and the need for higher densities than caravan pitches could afford in order to viably bring forward all three estates, as set out in the Estates Plan viability study (2017 (SD15))</p>
Policy B: Planning for traveller sites		

(paragraphs 7-11)		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring councils.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</p> <p>An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</p> <p>Policy which takes into account criteria a-h of para 11</p>	
<p>Policy C: Sites in rural areas and the countryside (para 12)</p>		
<p>When assessing the suitability of sites in rural or semi-rural settings councils should ensure that the scale of such sites do not</p>		

dominate the nearest settled community.	
Policy D: Rural exception sites (para 13)	
If there is a lack of affordable land to meet local traveller needs, councils in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.
Policy E: Traveller sites in Green Belt (paragraphs 14-15)	
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.	Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.
Policy F: Mixed planning use traveller sites (paragraphs 16-18)	
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring	Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and

residents.	neighbouring residents), or separate sites in close proximity to one another.	
Policy G: Major development projects (paragraph 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.	

Costal Change Management Area

2.9 As the London Borough of Merton does not have Coastal Change Management Area, the council has not done this part of the Soundness test.