

Future Merton London
Borough of Merton
2th Floor Civic Centre
London Road
Morden SM4 5DX

Our ref: SL/2006/100135/OT-07/IS1

Your ref: Email

Date: 2 February 2017

estatesplan@merton.gov.uk

Dear Sir/Madam,

Merton Estates Local Plan pre-submission publication

Thank you for consulting the Environment Agency on the above. Having been involved in the previous consultations, we are satisfied that most of our comments have been incorporated in the Merton's Estates Local Plan pre-submission publication.

Overall the pre-submission publication appears to be founded on robust and credible evidence base. The Environment Agency notes that the findings of the Sustainability Appraisal have been reflected in the document and used to inform the policies.

It is clear that flood risk is a consideration that has been taken into account in the preparation of the plan. We certainly welcome that the preferred options for the redevelopment of the estates are seeking to ensure that flood risk elsewhere is not increased, ways to reduced flood risk are being sought and any opportunities to make space for water are being considered.

The proximity of the Ravensbury Estate to the river Wandle and Ravensbury Park mean that there are good opportunities to restore the river Wandle through the park or undertake enhancements to improve the condition of the river as part of major redevelopment adjacent to it. Currently, the river is impounded and subject to a number of problems such as midges which have been problematic on a yearly basis. Redevelopment of the area provides an opportunity to improve the park and consider river restoration and enhancement to create a better functioning river and river corridor. This is recognised on paragraph 3.282, which we welcome.

Since we last made comment on the Estates Plan, the legislation for permitting works on watercourses has changed. Flood Defence Consents have been superseded by Flood Risk Activity Permits and now fall under the Environmental Permitting Regulations. Prior permission is still required for works in, over or under a main river or within 8m of the top of the riverbank.

We have attached more detailed comments below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

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Planning Specialist

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Eastfields

This area is situated within Flood Zone 1. However, the need to ensure surface water runoff is suitably managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS.

The suggestion of opening up a currently culverted watercourse on the eastern boundary of the site should be investigated further as part of the overall redevelopment. The opening up of a currently culverted watercourse could assist in managing flood risk at the site, as well as providing habitat and other biodiversity benefits.

High Path

This area is mainly situated within Flood Zone 1, though a part of the site is located within Flood Zone 2. The opportunity to increase the density of housing within a low fluvial flood risk area has been highlighted in the Plan. The recognition of needing to ensure surface water runoff is suitably managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS.

The Bunces Ditch, a designated main river, runs along the edge of or just within the boundary of the overall site. We note that comment is made regarding further investigations into the origin and route of this watercourse, as the exact line of a culverted watercourse can be difficult to determine from the surface. If there was an opportunity to open up a culverted watercourse it should be looked into further, as this can help to manage flood risk as well as having a number of biodiversity benefits. If development could be moved away from the watercourse that would also be of benefit in terms of access for maintenance purposes.

Ravensbury

The Ravensbury Estate is shown as being located within an area considered to be a high risk to fluvial flooding from the adjacent River Wandle. However the plan recognises that this needs to be effectively managed as part of the redevelopment of the estate. Ravensbury Estate is already developed for residential use and new development would offer the opportunity and potential for mitigation measures to be incorporated into the redevelopment. This would include the raising of the finished floor levels of dwellings to a minimum of 300mm above the 1 in 100 year flood level, taking into account climate change.

There would also be the opportunity for flood resistant and resilience in the redevelopment, which is also welcomed. Reference is also made to a SUDS strategy as part of the redevelopment. However, due to the varying levels of flood risk across the Estate, there is a need to carefully consider the sequential and exception tests, as well as the requirement for a site specific flood risk assessments. Adequate provision and consideration needs to be given to the category of development proposed for each area on the Estate and its compliance with the NPPF and the Boroughs own Policy on flooding. The introduction of a greater number of residential dwellings in an area at risk to flooding should be carefully assessed to determine whether it can be considered as appropriate in that location. In addition, any redevelopment proposal should be able to clearly demonstrate that there will be no loss of floodplain storage capacity and ideally, further storage for flood waters should be created.

It should also be noted that updated climate change guidance was released earlier this year, and therefore the most up to date information should be taken into account as part of any redevelopment plans. Any development should also take every opportunity to increase both the flood resistance and resilience to buildings and the surrounding environment.

We note that reference is made to the National Planning Policy Framework (NPPF) in relation to flood risk, and that it will be necessary to comply with the Sequential and Exception Tests as appropriate, and also the necessity of producing site specific Flood Risk Assessments to accompany detailed plans for the redevelopment of these areas.

Charles Muriithi, MRTPI