creating a better place

Environment Agency

Ann Clake
London Borough of Merton
Policy & Information
Merton Civic Centre London Road
Morden
Surrey
SM4 5DX

Our ref: SL/2006/100135/OT-06/PO1-L01
Your ref: mnxc|PO8DEW

Date: 30 March 2016

Dear Ann

London Borough of Merton Draft Estates Local Plan - Preferred Options

Thank you for consulting us on the Draft Estates Local Plan.

We support the weight given to flood risk management and enhancements for biodiversity within the draft plan.

We have provided detailed comments on the design principles in Section 1 attached on the three estates that make up the Merton Local Plan Area in sections 2-4 below.

We apologise for the delay in our response and hope you find our comments helpful, if you have any questions please contact me.

Yours sincerely

Joe Martyn
Planning Advisor

Direct dial 020 3025 5546
Direct e-mail kslplanning@environment-agency.gov.uk

Section 1: Design principles

2.41 Promoting biodiversity

We welcome the fact that biodiversity is seen as a valuable asset in the borough. This includes the assertion that biodiversity will not be adversely impacted by the regeneration proposals and that opportunities for biodiversity enhancement will be sought, which in turn will benefit the local communities.

Section 2: Eastfields

It is welcomed that Policy EP E6 Environmental Protection, highlights the need to ensure that flood risk is fully considered in line with all relevant policy and should include all possible and applicable SuDS features. In addition, Policy EP E6 also makes reference to the reduction of Greenfield runoff rate to be in line with the content of the Mayor's London Plan.

In Eastfields, one of the opportunities that is highlighted relates to the reconfiguration of open space and opportunities for landscape connectivity are set out. This opportunity should be tied in with the requirement to use SuDS and reduce the rate of surface water runoff, these open areas could offer another opportunity to incorporate SuDS features and act as storage and conveyance areas for surface water runoff. The planting of trees in urban setting are thought to act to take up water and could be part of an overall sustainable solution to drainage for the estate.

We would be supportive of the creation of a linear park to the north eastern side of the estate to incorporate a incorporate a swale or linear water feature to be facilitated by the de-culverting of the existing historic watercourse that flows underground between the estate and Long Bolstead Recreation Ground.

The removal of a watercourse from a culvert can not only have flood risk management benefits, but also a range of ecological and biodiversity benefits. If the ditch cannot be de-culverted (i.e. if it is still an operational TW sewer), there is a proposal for an offline sustainable drainage feature. Theses should be designed to benefit biodiversity.

Section 3: High Path

It is welcomed that Policy EP H6 Environmental Protection, highlights the need to ensure that flood risk is fully considered in line with all relevant policy and should include all possible and applicable SuDS features which could include opportunities to enhance the biodiversity value of the area.

In addition, Policy EP H6 also makes reference to the reduction of Greenfield runoff rate to be in line with the content of the Mayor's London Plan, this is also welcomed.

Environment Agency
Ergon House, Horseferry Road, London, SW1P 2AL
Telephone: 03708 506 506
Email: enquiries@environment-agency.gov.uk
Website: www.gov.uk/environment-agency

It is also noted and welcomed that there is specific reference to the use of open spaces to contribute towards the efficient system for the management of surface water runoff through the use of SuDS.

The report has highlighted that High Path is in close proximity to the River Wandle and therefore to areas which are considered to be at risk to fluvial flooding. In addition, the area is considered to be at risk to surface water flooding and is shown as such on the latest version of the surface water flood risk mapping. With this in mind, any opportunity to better manage runoff and flows from this area which would reduce the risk to flooding elsewhere should be encouraged and implemented. Reference is made in section 3.185 to the possible de-culverting of a section of the Bunces Ditch. This should be investigated in more detail as the removal of a watercourse from a culvert can not only have flood risk management benefits, but also a range of ecological and biodiversity benefits/value of the area.

F(i) and (ii) include the potential for a heat recovery system from the River Wandle. Such systems can have implications on the biodiversity of rivers, particularly fish, due to such factors as changes in water temperature and structures in the watercourse. Therefore we would welcome early discussions with all relevant functions of the Environment Agency if this proposal should proceed.

Section 4: Ravensbury

Issues and opportunities
Biodiversity is well covered in this section, with particular reference to the biodiversity value of the River Wandle and we support this recognition.

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. A majority of the estate is shown as being within the 1 in 100 year (1%) flood risk area, with other parts of the estate located within the 1 in 1000 year (0.1%) flood risk area. It is noted that flood risk to the Ravensbury Estate is referenced in section 3.236; this section also acknowledges that any regeneration must take into account this issue to ensure that flood risk is not increased elsewhere. All opportunities should be taken to reduce flood risk to the Estate and at other locations, with the design of any regeneration proposal taking every opportunity to increase resilience and resistance to flooding, as well as reducing flood risk overall. This should include changes to buildings to make them more resilient/resistant to flooding, and opportunities to alter layouts and the provision of open space to assist in managing flood risk should be taken. The proximity of the Estate to Ravensbury Park might also provide opportunities to flood reduction, with open areas being utilised for the storage of flood waters.

The suggestion for the inclusion of SuDS features that will manage surface water and create space for fluvial flood waters is noted, we would strongly encourage innovative thinking along these lines to increase available storage for floodwaters and

encourage the use of open spaces to convey and hold flood flows. It is welcomed that the reduction in runoff rates, in line with the London Plan, is highlighted. We welcome the proposals in 3.237 (Biodiversity) and 3.238 (Mitigate Flooding) of reducing flood risk and enhancing biodiversity, such as the creation of swales and other wetland habitats.

We particularly welcome the assertion in section 3.243 Biodiversity in Ravensbury Park that there should be a suitable landscape buffer between the river and the proposed development. This has the added benefit of maintaining a wildlife corridor alongside the river.

As stated in Policy EP R6, the River Wandle is a designated main river. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank. We fully support the statement that there should be a minimum 8 metres wide buffer zone along the River Wandle and 5m along ordinary watercourses, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the watercourses and creates an undeveloped wildlife corridor for animals to move along.

The regeneration of the Ravensbury Estate has the opportunity to include some real measures to reduce flood risk. With this in mind, significant consideration should be given to flood risk throughout the concept and design phases of regeneration, as there is the opportunity to deliver tangible benefits not only to the Estate but also to the wider area. There is also the opportunity to deliver multiple benefits via the regeneration, not only the reduction of flood risk, but also gains in biodiversity, recreation and social benefits for residents.

We support the multi-benefits of SuDS and in particular how a network of swales and other measures will help to create corridors for species to move along and link with adjacent habitats and open space, including the river corridor.

We welcome the potential reinstatement of a historic river channel alongside Morden Road as set out in section 3.281, as long as this does not increase flood risk. Any reinstatement should be designed for maximum biodiversity benefit.

We also welcome the potential to enhance the backwater tributary channel of the River Wandle that runs along the southern boundary of the site as well as in-channel enhancements of the River Wandle itself. We would be interested to see any proposal for enhancements, especially if any enhancements could assist in reducing flood risk and enhancing biodiversity.

We would be happy to advise on such enhancements to ensure biodiversity and geomorphology benefits are maximised without there being an increase in flood risk. This could contribute to the implementation of mitigation measures identified under the Water Framework Directive.

Environment Agency
Ergon House, Horseferry Road, London, SW1P 2AL
Telephone: 03708 506 506
Email: enquiries@environment-agency.gov.uk
Website: www.gov.uk/environment-agency

Flooding and biodiversity are identified as being particularly relevant to the redevelopment of this estate and we support the assertion that these factors are seen in a positive light by giving opportunities to improve flood risk, biodiversity and the landscape. We also support the fact that the proposed swales should not just be designed to attenuate run-off but will also benefit biodiversity.

Environment Agency
Ergon House, Horseferry Road, London, SW1P 2AL
Telephone: 03708 506 506
Email: enquiries@environment-agency.gov.uk
Website: www.gov.uk/environment-agency