

Date: 28 August 2013
Our ref: 92051
Your ref:

Duty to co-operate

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Dear Sir/Madam

Merton's Sites and Policies Plan and Policies Map (part of Merton's Local Plan)
Pre-submission publication: Monday 15 July to Friday 30 August 2013 (Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012)

Thank you for your correspondence in respect of the above consultation document, seeking the views and comments of Natural England on the above dated.

Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations

Natural England has previously commented on this Consultation document, our response dated 22 February 2013 refers. This response will be in response to the issues raised in respect of this phase of the consultation, and will be in respect of the areas affecting Natural England's remit.

Chapter 3: Support for Infrastructure – community facilities and education

The Council may wish to make reference to Open/green Spaces under this section as community facilities also; this can then be linked to other Chapters of the document such as Chapter 5 – Natural Environment. This will strengthen the document overall by linking policies and promoting sustainable development across the Borough.

Chapter 5: Natural Environment

Policy DM 01 Open Space –

This policy appears to have been strengthened in line with our previous comments and we therefore welcome the amendments

Natural England broadly supports this policy, but would like to see reference to creation of 'new open/green space' where appropriate, currently policy is passive. The Council should also give consideration to the potential for fragmentation and increasing deficiency of access, which could be offset by new open/green space as well as green chains/links or corridors (which is referenced under paragraphs 5.17 to 5.19), where appropriate.

In respect of delivering on the Natural Environment policies the Council may find that use of the existing natural signature of the borough can be used to help deliver this objective. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.

Natural England has produced a London Landscape Framework which gives further guidance on the 'natural signatures', which includes a section on the Wandle river valley. We recommend that you refer to this document consider its inclusion within this section of the development Plan Document. The London Landscape Framework can be found at:

<http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx>

Policy DM 02 Trees, Hedges and Landscape Features -

This policy also appears to have been strengthened in response to previous comments and the amendments are welcomed.

Paragraph 5.24 is welcomed in respect of the potential for Habitats Regulation Assessment and Appropriate Assessment, in respect of schemes and or policy documents that may impact upon Wimbledon Common.

Paragraph 5.25 refers to the aspirations to improve green infrastructure and provision of green links, chains and corridors, highlighting the benefits to the wider community and the links/reference to the Wandle Valley regional park are welcomed.

Chapter 6: Design

Natural England broadly supports this policy, especially in respect of the natural environment, biodiversity and natural habitats. The provision of green infrastructure and biodiversity enhancements in development applications is to be welcomed and encouraged, and has the potential to link into and strengthen other council policies.

This section still has a presumption in respect of hard landscaping within the public realm, although there is reference under paragraph 6.10.

Policy DM D1 Urban Design and Public Realm -

Natural England welcomes the inclusion of sub clause (h) referring to opportunities for enhancing biodiversity in all amenity spaces – "soft landscaping" and this can be extended to new development proposals in general, where appropriate.

Provision of "soft landscaping" also provides 'permeable' surfaces and can be used to link into Chapter 8 – Flooding and Drainage below.

Policy DM D2 Design Considerations in all developments –

The references to biodiversity and landscaping under paragraphs 6.20 and 6.21 are welcomed.

Chapter 8: Flooding and Drainage

DM F2 Sustainable Urban Drainage systems (SUDs)

Natural England welcomes and encourages the use of SuDS where appropriate, as part of Green Infrastructure, Ecology/Biodiversity opportunities, where appropriate. The reference to permeable surfaces and use of native planting can deliver this policy, whilst linking into other chapters/sections, helping to strengthen the document further.

Chapter 9: Transport

Natural England is supportive of sustainable transport options and encourages the links between this Policy and those of provision of green chains/links/corridors (Policies DM 01 and DM 02), together with increasing access to open/green spaces and nature where possible and appropriate (paragraph 9.4).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

For clarification of any points in this letter, please contact David Hammond on 0300 0601373. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

Yours faithfully

David Hammond
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Land Use Ops Team