

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

Date: 6 September 2021

### **Merton New Local Plan Publication Stage 3**

We welcome the Merton new local plan which has been updated with our comments and previous feedback.

We support the focus on protecting and enhancing the environment and adapting new and existing infrastructure to the impacts of climate change and more extreme weather events.

We welcome the updated policies on flood risk management, river restoration, pollution prevention, Wandle Valley Park, biodiversity, climate change, water efficiency and sustainable design and construction. We welcome the addition of the rivers to the overview map (Figure 1, page 16). We recommend the river names are also added to the map.

Delivery of the new local plan policies requires ongoing cross boundary and catchment working to deliver environmental improvement across the Wandle catchment. To adapt the urban environment requires ongoing multi agency and community liaison to identify issues and opportunities to make Merton resilient to extreme events such as summer heatwaves, poor air quality and extreme storm events.

The new local plan policies and future planning application decisions are key to improving the urban environment and delivering an increased amount of green space to adapt the environment for people and wildlife. We are keen to continue to working with you to identify any pollution / amenity issues and the key environmental infrastructure required to support delivery of your housing targets to ensure the environment is protected and enhanced.

We welcome how the new local plan explains how Biodiversity Net Gain (BNG) is expected to be applied. We recommend updating this to specify that Biodiversity Net Gain must include an improved river corridor if there is a river on / adjacent to the site. We recommend a 10 metre buffer where this is possible, and restoring natural banks and processes to the watercourse where this is feasible. BNG requirements are evolving as legislation and guidance is finalised and rolled out. We recommend the policy references the need to refer to the latest guidance and legislation regarding BNG.

Site allocation: CW5 Colliers wood

We recommend the policy is updated to include the need to enhance the Pickle Stream corridor as part of the redevelopment, to remove concrete banks, and restore ecology to the watercourse, and a 10 metre wide riverside buffer strip.

RP3 should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor to provide a biodiversity net gain. There should be an emphasis on providing a significant improvement in the green corridor.

## **Environmental evidence and data**

We welcome the updated Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) July 2021 which has been updated to include the strategies and plans we highlighted in our last consultation responses such as EA2025 and the Governments 25 year environment plan.

The following water resources should be added to the SEA/SA section on Water (page 68) and the out of date strategies removed.

Thames Water Resources strategy (April 2020) <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>

We support the Sustainability Objectives and the local plan monitoring indicators in Figure 10 in the SA / SEA relating to flood risk management, climate change, air quality, water resources, water quality, water consumption, open space and nature.

To strengthen the local plan monitoring further we recommend adding in some additional indicators below to assess the ongoing status of the environment and delivery / review of the local plan policies.

### **Flood risk and climate change**

- Number and location of Environment Agency flood warnings issued across LB of Merton annually

### **Water quality**

- Number and location of water pollution incidents reported to the Environment Agency across Merton annually
- Water quality status of water bodies across Merton

### **Open space and nature**

- Metres of main river improved and restored across Merton
- Biodiversity Net Gain delivered across LB of Merton

We recommend the evidence base for the local plan is regularly reviewed. New planning policies and decisions should be based on the latest environmental evidence on flood risk, water resources and climate change. For the latest environmental data see the Defra data services platform <https://environment.data.gov.uk/>

We look forward to working with you as the plan progresses. If you have any questions or require more information please let me know.

Yours faithfully

**James Togher**  
**Sustainable Places Team Leader**  
**South London**