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Good afternoon,

Thank you for consulting the Environment Agency on the Small Sites Toolkit and Merton Character Study. Please see our reply attached.

I hope our feedback is helpful, if you have any questions or require more information please let me know.

Many thanks

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

Our ref: SL/2006/100135/SD-06/IS1-L01  
Your ref:

Date: 23 March 2020

## Merton Small Sites toolkit consultation and Merton Character Study

Thank you for consulting the Environment Agency on the Small Sites Toolkit and Merton Character Study.

We support positive planning based on early pre application discussions informed by the latest environmental data and mapping to deliver good practice development. We want to work in partnership with local planning authorities and developers to ensure development is well designed and located to prevent environmental issues and delivers real environmental improvement and is resilient to climate change.

As outlined in our response to the Local Plan consultation (05 February) we feel the key environmental issues and opportunities across the London Borough of Merton relate to

- Flood risk management and adapting to climate change
- Partnership working to protect and improve the environment

We welcome the toolkit and character study which references flood risk management and improving rivers across Merton. We have suggested some additions below:

### 2.2 Building a design team (page 10)

We recommend adding in Statutory Planning consultees to Figure 3.1 on page 10 to raise awareness on the role of planning consultees in the planning process and importance of early and proactive working. Maybe an additional box could be added "*Statutory planning consultees and permitting authorities e.g. Environment Agency, Natural England etc. depending on the constraints and site conditions*".

When planning consultees are involved early in the planning process it can reduce objections and delays at planning application stage as all the key issues and opportunities have been addressed. We suggest some additional wording to 2.2 such as

*"Contact the Environment Agency for planning advice and guidance for proposed residential development within 20 metres of a river, high risk flood zones, groundwater source protection zones, contaminated land, close to a waste management site etc.*

[kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

We suggest including the following links

<https://www.gov.uk/topic/environmental-management/environmental-permits>

<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

### Site constraints (page 14)

We welcome the references to flood zones in the toolkit (3.2) and suggest adding the following environmental constraints

- *Main river on the site / adjacent*
- *Groundwater source protection zone*
- *Close to a permitted [waste management site](#)*

### Guidance notes

We support the inclusion of the flood zones and main rivers in the character areas. To ensure these key issues and opportunities are addressed early we recommend additional reference to the toolkit as well. We understand some of these will be covered as part of the Flood Risk Assessment process but it's useful to ensure developers are aware of all these key issues as early in the process as possible. We recommend updating the toolkit to address these key issues and opportunities, maybe these could be added in the Guidance notes section 5.1 (page 30).

- Which flood zone is the site in? e.g. Flood Zone 1, 2, 3 or 3B?
- Is a Flood Risk Assessment required? We recommend adding links to guidance on producing a quality Flood Risk Assessment (FRA) <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>
- Are basements proposed? Confirmation there will be no sleeping accommodation in basements in areas at risk flooding.
- Is there a watercourse on site / within 20 metres of the proposed development?
- Are there opportunities for river restoration and an increased buffer zones adjacent (8 metres) to watercourses and overall biodiversity net gain and improved greener river corridors? We recommend adding in the link to River restoration techniques guidance <https://www.therrc.co.uk/manual-river-restoration-techniques>
- Is the proposed development within 150 metres of a permitted [waste management site](#)?

We welcome that the River Wandle has been included as a key characteristic of the borough, and that both the council and the public agree that the waterways are an area for future growth - in terms of public access and acting as a 'blue or green corridor' for wildlife. Alongside river restoration and habitat improvement, it would be beneficial for the toolkit and character areas to also include consideration of water quality. A river is a more effective blue/green corridor and a more positive recreation space if the water quality is good and it is free from pollution.

### Environmental evidence and data

- For the latest data sets such as groundwater source protection zones, flood risk zones, main river maps, <http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login>
- Catchment planning data <https://environment.data.gov.uk/catchment-planning/>

We hope our response is helpful, if you have any questions or require more information please let me know.

Yours faithfully

**Sustainable Places Team Leader - South London**

customer service line 03708 506 506  
[gov.uk/environment-agency](http://gov.uk/environment-agency)