

Dear Planning,

Many thanks for consulting Natural England Regarding the Estates Local Plan pre-submission version; Apologies for the delay in providing our response.

Having taken a look at the documentation submitted it's clear that there is a desire to see the environment take a front and centre role (Policy ELP1) in the life of these estates in future both in terms of improvements on the ground now and also when accounting for climate change in years and decades to come. There is a big benefit to be seen from the proposed use of SuDS within the redevelopment on the three estates as this will help to improve water quality and quantity going into the River Wandle in the long term and also help reduce the surface water flood risks on the sites which are the primary area of concern from future changes to weather patterns from climate change.

The Sustainability Appraisal (SA) has been used to help ensure that there are realistic choices made during the process which enable redevelopment to go ahead while still achieving gains for the environment which are key to combating climate change and improving the health and wellbeing of those living in London where air quality is an issue. The options chosen give a good account of the reasons why and allow for a wide scope of improvements to the biodiversity on site across the three sites, with links to green corridors possible as well as green or brown roof spaces a possible feature.

Overall Natural England believes that provided the above elements are taken forward and there is a tangible improvement seen at the three estates as a result of redevelopment work then the environment will see benefits in the long term locally and more widely within London. The changes being suggested are not proposing huge modifications to the numbers of homes on the sites so it is unlikely that there would be a detrimental impact upon either Wimbledon Commons SAC or Richmond Park SAC however the Habitats Regulations Assessment process needs to be followed through to ensure that this is taken into account and mitigation is considered at the early stage to reduce risks in the first instance before impacts are possible.

Natural England will of course consider further comment when next consulted either during or after examination. Broadly however we do not have any major concerns to highlight.

Regards,

Piotr Behnke
Adviser
Sustainable Development
Thames Team

**Natural England,
Area 3A Nobel House,
17 Smith Square,
London
SW1P 3JR**

Tel: 0208 026 3893

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard