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**Our ref:** SL/2006/100135/PO-01/IS1

**Your ref:**

**Date:** 21 March 2012

Dear Ann Clarke,

**Re: London Borough of Merton Local Development Framework: Community Infrastructure Levy - Preliminary Draft Charging Schedule**

Thank you for consulting the Environment Agency on the above document. We would wish to recommend inclusion of flood risk prevention and protection infrastructure on Table 2: *CIL Infrastructure Project Funding Requirements*. The Planning Act states that "Infrastructure" legally includes among other items flood defence. We would wish to comment on the following:

- Flood Risk
- Potential for Flood Storage Opportunities.
- Changes to Flood Infrastructure Funding

Flood Risk

The borough Strategic Flood Risk Assessment (SFRA) has identified areas at risk from flooding along the Wandle, including around Colliers Wood town centre, the Pyl Brook (feeding into the Beverly Brook), Plough Lane and the Wandsworth border, and to the west of the borough around Shannon Corner. It further sets out detailed considerations relating to flood risk and new development in terms of: developments behind flood defences; specific measures for developments within the floodplain of the rivers Wandle, Graveney and Pyl Brook; surface water flooding and the use of sustainable drainage systems; water resources; residual risk and emergency planning.

It is estimated in the Wandle Strategy Inception Report that approximately £500k per annum is spent across the catchment by the Environment Agency, local authorities and Thames Water on maintenance of drainage infrastructure. This is equivalent to a present value of £15 million over 100 years. The 2012/13 System Asset Management Plan reflects maintenance costs of approximately 150k. However these costs vary from year to year.

We suggest that flood risk management should be considered as a separate issue/priority from *Climate Change*. Flood risk is not exclusively an issue related to climate change and it would therefore be more effective to consider this as a separate issue, incorporating all forms of flooding on Table 2. London Borough of Merton Core Strategy clearly distinguishes this by having specific climate change and flood risk management policies (see Policy CS 15 Climate Change and CS 16 Flood Risk Management)

Potential for Flood Storage Opportunities

We consider that new development within the borough should be required to

contribute towards the infrastructure required to alleviate flood risk. The CIL contributions could be used for both Environment Agency schemes or for resolving surface water flooding. In the past the Environment Agency and its predecessors have funded various strategy and inception reports all making recommendations for flood storage and raised defences at various locations. Some of these have been implemented (Anton Crescent and Derwent Road Flood Storage Areas) but others have not been pursued. In considering these options we highlight the necessity of;

- Carrying out a detailed assessment to determine the number of properties affected by flood risk within a project area and consideration of the avoided damages and flood risk benefits.
- Investigating alternative options and recommending a preferred option.
- Exploring opportunities to work in partnership with the local authority, local residents, Network rail and private utility companies to agree any cost effective scheme.

We have identified three areas where it might be possible to investigate the potential for flood storage opportunities.

#### East Pyl Brook Flood Storage Area at Morden Park

Approximate location: TQ2415167342

The 1999 Beverley Brook Flood alleviation feasibility study identified this as a location within the catchment with the potential to create flood storage with a balancing lake to alleviate flood risks and at the same time creating a wet land for habitat. Flood attenuation could benefit properties downstream of the Bow Lane trash screen.

At this stage it is roughly estimated that around 60 properties will benefit from reduced flood risks. We would recommend making a detailed study to assess the volume of storage available, the number of properties protected and the costs involved.

#### Flood Storage at Reigate Avenue Recreation ground, Rosehill

Approximate location: TQ2554166170

The East Pyl Brook is about 5km long and flows from Rosehill down to Morden where it meets the Pyl Brook near Morden Cemetery before joining the Beverley Brook about half way down the catchment.

Properties opposite (on Reigate Avenue) and adjacent (Glastonbury Road) have a history of flooding and 'near misses'. The main road also floods and there is an electrical sub-station near by (St Hellier) which has come close to flooding on numerous occasions. Initial site visits and studies indicate that there would be flood risk benefits for creating a Flood Storage Area within the park as well as ecological and aesthetic benefits and also to reduce peak flows at the recreation ground downstream of Reigate Avenue -on the left bank of the Pyl Brook East.

#### Wandsworth Town FAS

This is potentially a large scheme which could protect hundreds of properties. The project area boundary is now extended as far as Merton, where we might consider using land at Wandle Meadow Nature open area as flood storage.

The London Borough's of Wandsworth and Merton have been consulted and have agreed in principal to work together to develop a scheme. Further work is required to agree the level of partnership working including validation of the strategic flood risk model to confirm the level of flood risk.

Surface Water Management Plans have been produced by the London Borough of Wandsworth and the London Borough of Merton as Local Lead Flood Authorities within the scheme boundary. There are opportunities to develop synergies between the management of the surface water and fluvial flood risk and outline discussions have taken place.

Although the scheme has a strong possibility of being affordable the project team will continue to develop opportunities for external funding. Potential beneficiaries have been investigated using the National Receptor Database. Commercial properties within the scheme boundary (1% AEP flood zone) have been identified and in the absence of valuation data have been ranked by flood space. There is outline agreement to utilise the Community Infrastructure Levy which would seek contributions from future development.

CIL contributions would help to improve the viability of any flood alleviation schemes making it more likely that they will happen. We are happy to share with you the details of costing of the schemes in order to calculate CIL charges.

Historically there is a flooding issue around Colliers Wood Tube station which has had significant impacts on the Colliers Wood Tower proposals in the past. We do not know if the situation has been effectively resolved but this is the sort of situation where CIL may be an effective financial support mechanism for Flood Resilience Partnership Funding.

#### Changes to Flood Infrastructure Funding

There have been changes to the funding mechanism for flood and coastal defence projects. On 23 May 2011 Defra announced changes to the way funding will be allocated to flood and coastal defence projects. See the link below for more details: <http://www.defra.gov.uk/environment/flooding/funding-outcomes-insurance/>. The implication is that more funding for flood risk infrastructure will be expected to be provided locally as the traditional form of Grant in Aid is being reduced.

Instead of meeting the full costs of just a limited number of projects, the new approach could make Government money available towards any worthwhile scheme over time. Funding levels for each scheme will relate directly to the number of households protected, the damages being prevented, plus the other benefits a scheme would deliver. For the first time, grants for surface water management and property-level protection will be available alongside funding for other risks and approaches.

Government funds have also been allocated to local authorities to help carry out their new responsibilities as Lead Local Flood Authorities under the Flood and Water Management Act 2010. Please see attached document and link below.

<http://www.defra.gov.uk/news/2010/12/23/flood-funding/>

We hope the Council will work with infrastructure providers and stakeholders to identify requirements for infrastructure provision and services for new development and will seek to co-ordinate infrastructure delivery, whilst protecting local amenities and environmental quality.

We are keen to work closely with you to identify infrastructure projects and environmental improvement schemes which will benefit development of the borough in order to take best advantage of all funding opportunities.

Yours faithfully,

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