Dear Ann

Environment Agency response to the final consultation engagement stage of Merton’s Sites and Policies Development Plan, (known as stage 3)

Thank you for consulting us on the Stage 3 preferred option of the Sites and Polices DPD. Having reviewed the documents we have the following comments

- Site Polices
- Site Proposals Map

Site polices

5. Natural Environment
DM 01: Open space
The proposed policies do not contain any reference to seeking to enhance biodiversity or improving river habitats. Policy DM 01: Open Space seeks to ‘protect and enhance open space and to improve access to open space’. In the justification for the policy (5.2) the value of urban green open spaces for nature is recognised however there is no reference to preserving and enhancing the biodiversity of these open spaces within the policy.

Improving the biodiversity of public green spaces can improve the amenity value of the open space and provide an educational value through facilitating contact with the natural environment. Enhancing open spaces for biodiversity can create valuable havens for wildlife in an otherwise urban environment.

The River Wandle and the Beverley Brook are important features of the natural environment of Merton, however there is no policy seeking to protect and enhance these rivers. The Thames River Basin Management Plan, which includes the River Wandle and Beverley Brook, requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. A policy requiring development adjacent to rivers to restore the rivers, or enhance them to a more natural state, wherever possible, would provide clear, tangible and significant environmental gains in terms of character of the area and nature conservation, as well as contributing to the objectives of the
Water Framework Directive. We recommend that the policy be amend to included reference to the enhancement of biodiversity. Please see Lewisham Borough Council’s policy for rivers below as an example.

Core Strategy Policy 11
River and waterways network

1. The Council will work closely with the Environment Agency, English Heritage and a range of community organisations to ensure the River Thames, Deptford Creek and the Ravensbourne River Network are preserved and enhanced and contribute to the Blue Ribbon Network principles. This includes their water quality, landscape, biodiversity, amenity and historical value and wider recreational and health benefits as well as their potential as a transport route.

2. Development adjacent to rivers and the waterway network should contribute to their special character by improving the urban design quality and natural ability of the rivers and waterways to function, the vitality of the river frontages, and improving access to the foreshore and naturalising flood defences, where appropriate.

3. The Ravensbourne River Corridor Improvement Plan, in conjunction with the London Plan policies relevant to climate change and water, will be used to guide works and development along this waterway.

Policy DM. EP4: Pollutants
We support the aims of this policy.

8. Flooding and Drainage
DM F1: Support for flood risk management
While we support the aims of this policy we recommend that some changes are made in order to strengthen it. The table included in this policy currently states in section for in Flood Zone 3b that

‘Developments classed as ‘highly vulnerable’ will not be permitted without Environment Agency approved mitigation measures.’

We believe this may be an error and in fact should be more vulnerable and relates to key sites with the borough which the council wishes to bring forward.

We recommend that this section of the table is changed to read:

More vulnerable development that is considered key to the delivery of the boroughs wider aims may be acceptable provided that it can demonstrate that the wider sustainability benefits outweighs the designation of FZ 3b. The development will only be acceptable if it can demonstrate that it will be safe from and not increase flood risk off site.

We recommend this modification as it is important that development within the functional floodplain does not set a precedent that allows other schemes to be approved. We feel it is also important as this is a departure from national policy.
Although the supporting text from paragraph 8.2-8.5 mentions the borough Strategic Flood Risk Assessment (SFRA) including guidance on building design, site or area-specific Flood Risk Assessments and vulnerability, developments behind flood defences etc, there is no mention of SFRA in the policy wording itself.

Therefore at bullet (iv) we recommend inclusion of the following "All development proposals must have regard to the Borough Strategic Flood Risk Assessment (SFRA) findings and recommendations and the Local Flood Risk Management Strategy”.

DM F2: Sustainable drainage systems (SuDS) and; Wastewater and Water Infrastructure

Paragraph 8.12 mentions the requirements of Local Flood Risk Management Strategy under the Flood and Water Management Act 2010. It would be prudent to include this on policy DM F2. As you are aware LLFAs are now mandated to manage “local flood risk” which means flood risk from—

(a) surface runoff,
(b) groundwater, and
(c) ordinary watercourses.

Policies Map (formerly called the Proposals Map)

Site proposal 37
Wimbledon Greyhound Stadium
Plough Lane, Tooting, London, SW17 0BL

We have been involved with pre-application discussions with both the council and consultants concerning the development of this site for a mixed use development incorporating a new football stadium which would be enabled through the building of new residential units on site. It was indicated that the development of the site for creation of a football stadium was key aim of the borough of Merton.

We support the redevelopment of the existing greyhound stadium into that of a football stadium on a like for like footprint as it does not result in an increase in vulnerability.

For the development of the wider site to be acceptable the sustainability benefits to the borough need to be demonstrated and it be stated that they in this case outweigh the sites designation of functional floodplain designation

Any inclusion community / leisure facilities or residential needed to enable the building of the football stadium should be kept to a minimum. It should be demonstrated the all new built footprint does not lead to loss in flood storage, impeded flood flows or lead to a risk of flooding on or off site. Any application for the development should include a full drainage scheme for the whole site.
Site proposal 64
12 Ravensbury Terrace
12A Ravensbury Terrace, Wimbledon Park, SW18 4RL

We have had no recent discussion with the applicant concerning this location. For residential to be acceptable at this site we would need a clear indication from the council that the considered the wider benefits achieve by the development to outweigh the flood risk.

Site proposal 70
Haslemere Industrial Estate
Haslemere Industrial Estate, 20 Ravensbury Terrace, Wimbledon Park,

We support the preferred use as industrial/employment over the suggested use as residential. While the lies in the functional flood plain we are happy to discuss redevelopment of the site within its existing vulnerability classification. Any development should not lead to an increased in built footprint which could result in a loss of flood storage.

Site Proposal 50
7, 8 and 12 Waterside Way
7, 8 and 12 Waterside Way, Tooting, London, SW17 0HB

Under the November 2012 for section for this site it states that ‘the site was assessed for its suitability as a school in an external report commissioned by the London Borough of Merton but was rejected on grounds of an unsuitable industrial setting.’

We recommend that it also be acknowledge that educational use is considered more vulnerable and therefore not suitable with 3b functional floodplain.

We trust our comments have been of use. If you have any question or would like to meet to discuss the response further please contact me.

Yours sincerely

Joe Martyn
Planning Liaison Officer

Direct dial 0207 091 4062
Direct e-mail joseph.martyn@environment-agency.gov.uk
## Merton Stage 2 site allocation constraints check

<table>
<thead>
<tr>
<th>Address</th>
<th>Environmental constraints</th>
<th>Constraints</th>
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<tbody>
<tr>
<td></td>
<td>Flood Risk</td>
<td>Groundwater Protection</td>
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<tr>
<td>02) 43-45 Palestine Grove</td>
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<td>04) Bond Road Day Nursery 55 Bond Road</td>
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<td>05) Colliers Wood Community Centre</td>
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<td>08) Leyton Road Centre, 21 Leyton Road</td>
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<td>13) Land at Rose Avenue</td>
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<td>14) Taylor Road Day Centre</td>
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<td>15) West Barnes Library West Barnes Lane</td>
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<td>18) 60 Pitcairn Road, Mitcham, Surrey, CR4 3LL</td>
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<td>24) Morden Road Clinic 256 Morden Road</td>
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<td>34) Raleigh Gardens Car Park Car Park, 9-17 Western Road</td>
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<td>36) Chaucer Centre Canterbury Road</td>
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<td>38) Thames Water Site Byegrove Road</td>
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<td>41) Kingston Road Opposite Lower Downs Land Between</td>
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<td>46) The Old Lamp Works, 25 High Path</td>
<td>SPZ2, adjacent to investigated site.</td>
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<td>48) Land at Bushey Road 80-88 Bushey Road</td>
<td>Small corner SW of site in FZ3, Minor Aquifer</td>
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<td>49) Wimbledon Delivery Office 12 Cranbrook Road</td>
<td>Borehole well springs within site boundary</td>
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<td>50) 7, 8 and 12 Waterside Way, 7, 8 and (7 &amp; 8) FZ3 (12) FZ3, Adjacent Wandle/Graveney/Norbury Brook.</td>
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<td>55) Field B St Catherine’s Square</td>
<td>FZ3, Adjacent Pyl Brook</td>
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<tr>
<td>59) Corner Baltic Close and High Street Colliers Wood, 194-196 High Street</td>
<td>FZ2, SPZ1</td>
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<tr>
<td>60) York Close Car Park, Car Park Adj No 18, York Close</td>
<td>Merton D culvert running through site</td>
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</tbody>
</table>

**Key**

- Environmental constraint present at this site

**Flood Zone**

- **FZ3** Flood Zone 3 - the high risk flood zone, defined by Planning Policy Statement 25: Development and Flood Risk (PPS25) Annex D as land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

- **FZ2** Flood Zone 2 - the medium risk flood zone, defined by Planning Policy Statement 25: Development and Flood Risk (PPS25) Annex D as land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.
SPZ1 Source Protection Zone 1 – Inner source protection zone (most sensitive zone)

SPZ2 Source Protection Zone 2 – Outer source protection zone

SPZ3 Source Protection Zone 3 – Total catchment


Watercourse

Watercourse on / under / near the site

Detailed site comments

02) 43-45 Palestine Grove, Colliers Wood, London, SW19 2QN
SPZ1, FZ2 (fluvial)
Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is in FZ2.

Groundwater Protection
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due the past, potentially contaminating, uses on site. The presence of a sensitive aquifer (SPZ1) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

04) Bond Road Day Nursery, 55 Bond Road, Mitcham, CR4 3HG
SPZ2, GW: Minor, FZ1
Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area. The site is located in a critical drainage area

Groundwater Protection
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site’s previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (SPZ2 and GW: Minor), to protect groundwater quality.

The presence of a sensitive aquifer (SPZ2 and GW: Minor) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

05) Colliers Wood Community Centre
FZ2 (fluvial) Aprox 8m from R Graveney, SPZ2.
Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is in FZ2 and in a critical drainage area. The presence of the River Graveney will need to be considered in terms of ensuring that no development or construction methods affect the stability of the culvert or ability to inspect and maintain it.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site’s previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (SPZ2), to protect groundwater quality. The presence of a sensitive aquifer (SPZ2) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

**08) Leyton Road Centre, 21 Leyton Road, Colliers Wood, London, SW19 1DJ**

**Part II**  
FZ1, GW: Minor, SPZ1  

**Flood Risk**  
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area. The site is located in a critical drainage area.

**Groundwater Protection**  
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site’s previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (SPZ1 and GW: Minor), to protect groundwater quality. The presence of a sensitive aquifer (SPZ1 and GW: Minor) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

**13) Land at Rose Avenue, Mitcham, CR4 3JX**  
FZ1, GW: Minor, SPZ 2.  

**Groundwater Protection**  
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site’s previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (SPZ2 and GW: Minor), to protect groundwater quality. The presence of a sensitive aquifer (SPZ2 and GW: Minor) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

**14) Taylor Road Day Centre, Wakefield Hall, Taylor Road, Mitcham, CR4 3JR**  
FZ1, SPZ2, GW: Minor  

**Groundwater Protection**  
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site’s previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (SPZ2 and GW: Minor), to protect groundwater quality. The presence of a sensitive aquifer (SPZ2 and GW: Minor) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

**15) West Barnes Library, West Barnes Lane, 10 Station Road, New Malden, Surrey, KT3 6JJ**
FZ2 (fluvial), GW: Minor

Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area and has historical surface water issues. The site is located in a critical drainage area.

Groundwater Protection
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site’s previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (GW: Minor), to protect groundwater quality.

The presence of a sensitive aquifer (GW: Minor) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

18) 60 Pitcairn Road, Mitcham, Surrey, CR4 3LL
FZ1, SPZ2, GW: Minor.

Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area. The site is located in a critical drainage area.

Groundwater Protection
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site.

The presence of a sensitive aquifer (SPZ2 and GW: Minor) means infiltration is likely to be restricted to make sure groundwater quality and local abstraction water quality is not affected by any development.

24) Morden Road Clinic, 256 Morden Road, South Wimbledon, London, SW19 3DA
FZ1, Adj to R. Wandle & Investigated Site.

Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding and the proximity of the River Wandle are considered and sufficiently mitigated for because the site is adjacent to the River Wandle. Developments must not negatively affect the structural integrity of river banks or flood defences and should be designed to enable the Environment Agency to inspect them and for future maintenance works to be provided for.

Biodiversity
Development should be set back from river edges and flood defences set back and strips for biodiversity provided, to provide biodiversity corridors

Groundwater Protection
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site.

34) Raleigh Gardens Car Park, Car Park, 9-17 Western Road, Mitcham, Surrey, CR4 3ED
Minor Aquifer, approx. 93m from borehole well springs

Groundwater Protection
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site.

The presence of a sensitive aquifer (Minor Aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

36) Chaucer Centre, Canterbury Road, Morden, Surrey, SM4 6QB
Small area south of the site in SPZ3

Flood Risk
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently
mitigated for because the site is in a critical drainage area. The site is located in a critical drainage area.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site's previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (SPZ3), to protect groundwater quality.

The presence of a sensitive aquifer (SPZ3) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

37) Wimbledon Greyhound Stadium, Plough Lane, Tooting, London, SW17 0BL
FZ3b, non-main rivers passing through the site, >1Ha, boreholes present.

**Flood Risk**
A Sequential Test should be undertaken to ensure there is no reasonable alternative land at lower flood risk that can be developed prior to this site. If not, any proposed uses must be appropriate for the degree of flood risk at the site. If so, a Flood Risk Assessment will need to be submitted with any planning application to make sure, all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is in FZ3b and a critical drainage area. The Flood Risk Assessment should also consider the treatment of the non-main rivers that pass through the site and the site's drainage such that off-site flood risk is sufficiently reduced and SUDS incorporated.

**Biodiversity**
We encourage the de-culverting of rivers for flood risk and biodiversity reasons. Therefore, the possible de-culverting of the non-main rivers on-site should be considered.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site.

38) Thames Water Site, Byegrove Road, Colliers Wood, SW19 2AY, Part II
FZ3, Adjacent Wandle, Minor Aquifer, SPZ2, 3 borehole well springs within site boundary.

**Flood Risk**
A Sequential Test should be undertaken to ensure there is no reasonable alternative land at lower flood risk that can be developed prior to this site. If not, any proposed uses must be appropriate for the degree of flood risk at the site. If so, a Flood Risk Assessment will need to be submitted with any planning application to make sure, all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is in FZ3b and a critical drainage area. The Flood Risk Assessment should also consider the treatment of the non-main rivers that pass through the site and the site's drainage such that off-site flood risk is sufficiently reduced and SUDS incorporated.

**Biodiversity and Recreation**
We encourage the enhancement of rivers for flood risk, biodiversity and recreation reasons. Therefore, we recommend the naturalisation of the river bank, setting back of any flood defences and provision of public access walkways within the vicinity of the adjacent river.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site. The presence of a sensitive aquifer (SPZ2 and Minor Aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

41) Kingston Road Opposite Lower Downs, Land Between 424 - 448, Kingston Road, Raynes Park, SW20 8DX
Minor Aquifer, borehole well springs adjacent site.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the lack of historical detail concerning the site's previous uses and therefore inability to eliminate the possibility that these were potentially contaminating, due to the presence of a sensitive aquifer (GW: Minor), to protect groundwater quality.
The presence of a sensitive aquifer (Minor Aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

Minor Aquifer, SPZ2, adjacent to investigated site.

**Flood Risk**
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area. The site is located in a critical drainage area.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site. The presence of a sensitive aquifer (SPZ2 and Minor Aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

**48) Land at Bushey Road, 80-88 Bushey Road, Raynes Park, London, SW20 0JH**
Small corner SW of site in FZ3, Minor Aquifer

**Flood Risk**
A Sequential Test should be undertaken to ensure there is no reasonable alternative land at lower flood risk that can be developed prior to this site. If not, any proposed uses must be appropriate for the degree of flood risk at the site. If so, a Flood Risk Assessment will need to be submitted with any planning application to make sure, all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is partly in FZ3 and a critical drainage area.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site. The presence of a sensitive aquifer (Minor Aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

**49) Wimbledon Delivery Office, 12 Cranbrook Road, Wimbledon, London, SW19 4HD**
Borehole well springs within site boundary

**Flood Risk**
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area. The site is located in a critical drainage area.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site. The presence of a sensitive aquifer (Minor Aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

**50) 7, 8 and 12 Waterside Way, 7, 8 and 12 Waterside Way, Tooting, London, SW17 0HB**
(7 & 8) FZ3, Borehole well springs 32m from site.
(12) FZ3, Adjacent Wandle/Graveney/Norbury Brook, Minor Aquifer. Borehole well springs 21m from site.

**Flood Risk**
A Sequential Test should be undertaken to ensure there is no reasonable alternative land at lower flood risk that can be developed prior to this site. If not, any proposed uses must be appropriate for the degree of flood risk at the site. If so, a Flood Risk Assessment will need to be submitted with any planning application to make sure, all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is in FZ3b and a critical drainage area. The Flood Risk Assessment should also consider the treatment of the non-main rivers that pass through the site and the site’s drainage such that off-site flood risk is sufficiently reduced and SUDS incorporated.

**Biodiversity and Recreation**
We encourage the enhancement of rivers for flood risk, biodiversity and recreation reasons. Therefore, we recommend the naturalisation of the river bank, setting back of any flood defences and provision of public access walkways within the vicinity of the adjacent river.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site.

55) Field B St Catherine’s Square West Barnes, Grand Drive, Raynes Park, London, SW20 9NA
FZ3, Adjacent Pyl Brook, Minor Aquifer

**Flood Risk**
A Sequential Test should be undertaken to ensure there is no reasonable alternative land at lower flood risk that can be developed prior to this site. If not, any proposed uses must be appropriate for the degree of flood risk at the site. If so, a Flood Risk Assessment will need to be submitted with any planning application to make sure, all sources of flooding, including fluvial, are considered and sufficiently mitigated for because the site is in FZ3 and a critical drainage area. The Flood Risk Assessment should also consider the treatment of the non-main rivers that pass through the site and the site’s drainage such that off-site flood risk is sufficiently reduced and SUDS incorporated.

**Biodiversity and Recreation**
We encourage the enhancement of rivers for flood risk, biodiversity and recreation reasons. Therefore, we recommend the naturalisation of the river bank, setting back of any flood defences and provision of public access walkways within the vicinity of the adjacent river.

**Groundwater Protection**
The presence of a sensitive aquifer (minor aquifer) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

FZ2, SPZ1

**Flood Risk**
A Flood Risk Assessment will be needed to be submitted with any planning application to make sure all sources of flooding, including surface water, are considered and sufficiently mitigated for because the site is in a critical drainage area and has historical surface water issues.

**Groundwater Protection**
The presence of a sensitive aquifer (SPZ1) means infiltration is likely to be restricted to make sure groundwater quality is not affected by any development.

60) York Close Car Park, Car Park Adj No 18, York Close
Merton D culvert running through site

**Biodiversity**
We encourage the de-culverting of rivers for flood risk and biodiversity reasons. Therefore, the possible de-culverting of the non-main rivers on-site should be considered.

**Groundwater Protection**
A preliminary risk assessment of any contamination on site will be needed to be submitted with any planning application due to the past, potentially contaminating, uses on site.