

Date: 21 March 2012  
Our ref: 44388  
Your ref:



London Borough of Merton  
Strategic Policy & Research

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### **Electronic Copy Only**

Dear Sir/Madam,

#### **Have you Say; “Planning Ahead – Shaping development in your Neighbourhood”**

Thank you for your correspondence dated 30 January 2012, requesting Natural England’s views and comments on the above consultation document.

Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.

#### **Draft Sites and Policies Development Plan Document and Draft Proposals Map**

##### Chapter 2: Housing

Natural England has no substantive comments to make on this chapter, however, in view of the potential increase in population and resident numbers the Council may find the following information of use.

Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:

- No person should live more than 300 metres from their nearest area of natural green-space;
- There should be at least one accessible 20 hectare site within 2 kilometres;
- There should be one accessible 100 hectares site within 5 kilometres;
- There should be one accessible 500 hectares site within 10 kilometres.

This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.

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## Chapter 5: Natural Environment

### Policy DM 01: Open Space

This policy is broadly supported though the Council may wish to make references to the Natura 2000 site at Wimbledon Common also.

The protection of Green Chains and improving linkages (paragraph 5.12) is welcomed and to be encouraged.

### DM 02: Trees, Hedges and Landscape Features

Provision of replacement features of a similar or greater value, where appropriate is welcomed and to be encouraged, using native species to increase and enhance the ecological and biodiversity of the area.

The council should consider the role of the natural environment under this section/objective. Incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect, increasing walking and cycling opportunities, promoting health and increasing access to nature and open spaces. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Core Strategy, and the policies linked to reflect this.

The use of the existing natural signature of the borough can be used to help deliver this objective. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.

Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures', including a section on the Wandle river valley. We recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the Core Strategy. The London Landscape Framework can be found at:

<http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx>

The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would also be in line with the councils aspiration to promote and increase walking and cycling opportunities and help to make the natural environment the "arteries and veins" of the borough.

## Chapter 6: Design

### DM D1 Design Considerations in all Developments

This policy is welcomed and broadly supported, especially in respect of A) (vii) relating to conserving and enhancing the natural environment with regards to biodiversity and wildlife habitats.

The provision of green infrastructure can help with the Council's policies and alleviate issues of fragmentation, areas of deficiency, climate change adaptation and heat island effects as mentioned above, as well as providing ecological and biodiversity enhancements for the borough. Therefore their inclusion in developments, where appropriate, is to be recommended and encouraged.

Paragraph 6.6 referring to not causing 'significant' adverse impacts on species, habitats and landscape is welcomed and to be encouraged. However, the definition of 'significant' is debatable and can be open to local interpretation. The Council should give consideration to tightening this section.

Natural England is also pleased to see the reference to Green Infrastructure such as green roofs in this section and this links to our comments above.

## **Living roofs**

Natural England is supportive of the inclusion of living roofs in all development in principle: they can provide useful habitat for local wildlife and contribute to sustainable urban drainage. Natural England recommends the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area.

[www.livingroofs.org.uk](http://www.livingroofs.org.uk) has a range of innovative solutions.

## DM D4 Urban Design and the Public Realm

The Council should consider the potential for green infrastructure and “soft” landscaping of the public realm, where appropriate, this will link in and strengthen Council policies elsewhere in the document.

## Chapter 7: Environmental Protection

### DM F2 Sustainable Urban Drainage Systems (SuDS)

The provision of “soft” landscaping and SuDS is welcomed and to be encouraged, linking in to natural England’s comments above.

## Chapter 9: Transport

### DM T1 Support of Sustainable Transport and Active Travel

Natural England welcomes and encourages the promotion of sustainable transport initiatives, including walking and cycling. The Council should consider the potential for walking and cycling routes to provide Green Chains/Links to and between open spaces as well as services and facilities.

## **Appendices: Proposals**

### B: Open Space Proposals

Natural England welcomes and supports the provision/allocation of 104.2 hectares towards the Wandle Valley Regional Park; see also our comments above in respect of natural signatures. Natural England would like to be kept informed of the details and timescales for implementation of the Wandle Valley along with details of management and monitoring arrangements as proposals are brought forward.

### C: Natural Environment Proposals

The Council should consider listing Richmond and Wimbledon Common as NATURA 2000 sites. This is important as developments adjacent to or in proximity to these sites need to be aware of the potential impacts and the possibility of Habitat Regulation Assessment screening.

## **Potential Sites for Development**

Natural England has no substantive comments to make on this section at this time; however we welcome the opportunity to comment on schemes and developments as they are brought forward.

## **Borough Character Survey**

Natural England welcomes the preservation of existing open space, but recommends the Council considers the potential for increasing and enhancing open space provision, where appropriate, through green infrastructure as mentioned above.

## **Community Infrastructure Levy: Preliminary Draft Charging Schedule**

The approach and methodology appears to be in line with other London borough’s approach and therefore is acceptable to Natural England.

I hope that this makes Natural England’s position clear but if you have any further questions about this letter or require further information please do not hesitate to contact me.

Yours Sincerely,

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