

Date: 22 February 2013
Our ref: 75351
Your ref:



Strategic Policy and Research
Future Merton
London Borough of Merton
12 Floor Civic Centre
London Road
Morden
SM4 5DX

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6JC

BY EMAIL ONLY

T 0300 060 3900

Dear Sir/Madam

Final Consultation Engagement Stage of Merton's *Sites and Policies Development Plan* (Known as Stage 3)

Thank you for your correspondence in respect of the above consultation document, seeking the views and comments of Natural England on the above dated.

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

Chapter 2: Housing

Although Natural England has no substantive comments to make in regards to housing provision or tenure mix within the Borough we offer the following advice to assist in alleviating areas of deficiency for access to nature/green space.

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 boroughs more than others, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.

Chapter 3: Support for Infrastructure – community facilities and education

The Council may wish to make reference to Open/green Spaces under as community facilities also, this can then be linked to other Chapters of the document such as Chapter 5 – Natural Environment. This will strengthen the document overall by linking policies and promoting sustainable development across the Borough.

Chapter 5: Natural Environment

Policy DM 01 Open Space – “*To promote and enhance open space and to improve access to open space*” is supported, however, sub clause (d) in respect of creation could be made more explicit and included within the Policy aim above, e.g.

“To promote, enhance and create, where appropriate, open spaces within the Borough and to improve access to Open Space”

Natural England broadly supports this policy, but would like to see reference to creation of ‘new open/green space’ where appropriate, currently policy is passive. The Council should also give consideration to the potential for fragmentation and increasing deficiency of access, which could be offset by new open/green space as well as green chains/links or corridors (which is referenced under paragraphs 5.17 to 5.19), where appropriate.

Natural England is pleased to see the references under paragraph 5.2, to the multiple roles Biodiversity and the natural environment can provide. Opportunities not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This could be brought out more fully in the Site and Policies DPD and help the borough’s green infrastructure to deliver multiple functions, benefitting and contributing to a number of policies.

Paragraph 5.3 is welcomed in respect of the potential for Habitats Regulation Assessment and Appropriate Assessment, in respect of scheme and or policy documents that may impact upon Wimbledon Common.

Also welcomed is the references to establishing initial maintenance guidelines/criteria/funding for new open space to assist in long term viability.

In respect of delivering on the Natural Environment policies the Council may find that 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 produced a London Landscape Framework which gives further guidance on the ‘natural signatures’, which includes a section on the Wandle river valley. We recommend that you refer to this document consider its inclusion within this section of the development Plan Document. The London Landscape Framework can be found at:

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

Policy DM 02 Trees, Hedges and Landscape Features.

This policy is broadly supported and can be linked to the Council’s aspirations to improve green infrastructure and provision off green links, chains and corridors. This also has the potential to link in with the All London Green Grid.

Chapter 6: Design

Natural England broadly supports this policy, especially in respect of the natural environment, biodiversity and natural habitats. The provision of green infrastructure and biodiversity enhancements in development applications is to be welcomed and encouraged, and has the potential to link into and strengthen other council policies.

Policy DM D4: Urban Design and the Public Realm

Natural England welcomes the inclusion of sub clause (h) referring to opportunities for enhancing biodiversity in all amenity spaces – “soft landscaping” and this can be extended to new development proposals in general, where appropriate.

Chapter 8: Flooding and Drainage

DM F2 Sustainable Urban Drainage systems (SUDs)

Natural England welcomes and encourages the use of SUDs where appropriate, as part of Green Infrastructure, Ecology/Biodiversity opportunities, where appropriate.

Chapter 9: Transport

Natural England is supportive of sustainable transport options and encourages the links between this Policy and those of provision of green chains/links/corridors (Policies DM 01 and DM 02), together with increasing access to open/green spaces and nature where possible and appropriate (paragraph 9.4).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

For clarification of any points in this letter, please contact David Hammond on 0300 0601373. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

Yours faithfully

David Hammond
Lead Advisor
Land Use Ops Team