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LOCAL PLAN RESONSE

STRATEGIC INDUSTRIAL SITES:

The latest findings on the devastating impact of air pollution on the health of the population should alert Merton Council that a mix of heavily polluting industry in the Durnsford Road and Plough Lane area in close proximity to residential developments is not acceptable. This is NOT a site for heavily polluting industry which in the case of 'Reston' in Weir Road draws a 'steady' stream of heavy NO polluting HGV vehicles from all directions into an area already identified as breaking EU safety limits.

The whole Weir Road site should be available for 'light' industrial use , office and start-up spaces only and no further development of polluting industry which leads to a worsening of airquality due to their operation and associated increase in traffic should be permitted!

As the large Homebase store on Durnsford Rd/Weir Road has recently been shut down a lot of new land will become available which should be designated for much needed residential use, thereby expanding the existing residential development on the Plough Lane/Durnsford Road corner.

Plough Lane and Durnsford Road, with their proximity to the green corridor of the Wandle Trail should be reserved for 'light' industrial use. This kind of use already takes place in the majority of sites on these industrial estates, alongside only a small minority of invasive, polluting operations. **The polluting operations in this area proposed to become the 'London Regional Park' should not be allowed to expand and should be gradually phased out. Where breaches in operation conditions are identified, inforcement action should be taken immediately.**

Strategic policy W.6.3 Waste management

6.3.2 The South London Waste Plan provides the essential infrastructure to support housing growth in south London by safeguarding existing waste treatment sites, identifying sites and areas suitable for new waste facilities and includes planning policies that both ensure that waste arising in the boroughs are managed within the South London Waste Plan area and that new or redeveloped waste treatment facilities have the least impact on nearby uses and the environment.

Any expansion of existing waste treatment sites in residential areas should be rejected.

Policy Ec7.1 Economic Development

7.1.4 One of the council's main aims is to be open for business and invest in our residents' quality of life by providing suitable and well-located space for a wide variety of businesses and services that enable residents to work and run businesses locally, reducing the need for excessive commuting.

Converting existing heavy industrial usage in residential areas to local low industrial usage will help support local economy and air quality objectives, enhancing health outcomes.

7.1.10 To help support and strengthen the local economy during this time of continued uncertainty and in order to provide the borough with a strong foundation for future business growth, competition and employment, it is our intention to substantially protect and wherever possible, improve the quality of the borough's Strategic Industrial Locations, Locally Significant Industrial Sites and scattered employment sites.

These can be protected by encouraging use of SILs in residential/environmentally sensitive areas such as Wandle Valley to switch from heavy industrial to light industrial use, for which there is high demand.

7.1.11 However the council wants to support established business sites that can continue to safely accommodate modern business operations in an urban setting without requiring restrictions on opening hours, vehicle movements etc. being placed on the business to protect nearby local amenity. Therefore the council has proposed some amendments to Merton's Strategic Industrial Locations and Locally Significant Industrial Areas which are set out in draft Policy Ec2 to ensure that Merton's SILs and LSISs are fit for purpose.

This paragraph reads like Merton's admission that it will put the welfare of business above that of the local community which risks putting Public Health in jeopardy. Local amenity MUST be protected. Businesses MUST be forced to behave like good neighbours. So far there are plenty of recent examples that this is NOT the case!

7.1.18 In considering developments these developments, the council's priorities will be:) the enhancement or protection of local amenity in the surrounding area. This includes the vitality and viability of town centres and high streets, the business priorities for established and designated business areas and residential amenity of local neighbourhoods and scattered employment sites;) the provision of jobs, with emphasis on the provision of a wide range of salaries and skills and a high number of jobs;) Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties

These priorities should include sustainability and effects on residential amenity!

Designated business and industrial sites

7.2.14 Merton's Strategic Industrial Locations are recorded on Merton's policies map and set out below

Durnsford Road / Weir Road 10ha Range of different businesses

Plough Lane 15ha Range of businesses

The Local Plan must reflect the reality that the ‘present’ conditions surrounding these two SILs have changed drastically since a dense residential development was built on the borders and an even larger one has been given planning permission in close proximity.

7.2.15 To allow for businesses to operate without excessive constraints from nearby homes (such as restrictions on opening hours, heavy vehicle movements, noise etc) the council will support proposals for research and development (B1 [b] Use Class), light industrial (B1[c] Use Class), manufacturing (B2 Use Class) and storage and distribution (B8 Use Class) within the designated industrial areas.

B2 class is no longer appropriate as large housing developments are bordering this site and air quality is already breaching EU limits. This area has become a pollution blackspot and failed AQ objectives. Merton cannot declare their support for limiting air pollution on the one hand and on the other allow more polluting industry into areas with high residential development, thereby endangering the health of the public and the lung development of our children. Particularly this area as a high proportion of young families with children.

7.2.16 Logistics and other employment activities that generate frequent vehicle movements to and from the site/premises (excluding retail warehousing or any type of retail activity), will be encouraged to locate within the main industrial areas that are adjacent to the Strategic Road Network and have good vehicular access to the site.

When air quality in that area is already breaching safety limits it is irresponsible for any Council to support industry which creates more vehicular traffic, particularly by heavy NO polluting HGVs, when the ‘access’ to this area is closely bordering residential developments as in Durnsford Road. Further expansion of these operations should NOT be a given.

7.2.17 In designated industrial areas in Merton, higher density trip-generating developments such as offices (B1 [a] Use Class) can interfere with the operations of surrounding businesses through increased traffic congestion, parking and pedestrian movements. Planning permission will not be granted for the development of offices in the designated industrial areas unless these are ancillary to the principle use of the premises or site.

THIS IS A COMPLETELY FALSE AND PUZZLING STATEMENT! Office developments don’t necessarily engender traffic congestion as most office workers use public transport. It certainly does not attract high volumes of HGV traffic, well known for its toxic NO emissions. Quite frankly I cannot understand how the Council has come to such a conclusion. Particularly in Plough Lane public transport is easily available.

7.2.18 Industrial areas are protected for business use to maintain an environment where businesses can operate alongside other businesses without the same restrictions that would apply if these businesses were to locate in a residential area. Merton has a wide range of key businesses that support jobs and provide services to London’s population. These include food production, waste management, and

industrial laundrettes serving hotels and hospitals, printers, theatre stage engineering and other activities.

Where residential usage of surrounding area is expanding eg Plough Lane these activities should not be allowed to start up.

7.2.19 What these businesses have in common is the need to operate without the restrictions that would be placed on them in more residential areas. HGV movements, additional noise and smells, early morning starts or 24 hour operations are essential operational requirements for many businesses. The council has implemented an Article 4 Direction to prevent the further conversion of offices to residential within designated industrial areas and Wimbledon town centre via prior approval in order to protect space for business uses. The council will also ensure that established noise-generating businesses (e.g. industrial uses, rail infrastructure) remain viable and can continue or grow without unreasonable restrictions being placed on them, in line with the “Agent of Change” approach in the NPPF 2018 and in draft policy D4 in the Draft London Plan 2016.

If the Council wants these businesses to operate without restrictions, they should not allow expansion of residential development on their doorstep. Building 600+ flats on old Stadium site, then allowing expansion of polluting activities on the doorstep would be perverse and contrary to health and wellbeing policies.

7.2.20 Proposals for new development or change of use should be compatible with the amenity of neighbouring occupiers of buildings. **If proposals are likely to conflict with the successful operation of existing businesses nearby or detrimentally harm the amenities of occupants of neighbouring buildings, planning permission will not be granted.** Mitigation measures through 7.15 design condition or planning obligations may be sought to improve site access or minimise disruption to neighbouring businesses where necessary.

This is absolutely essential. Polluting operations in vicinity of housing, schools, hospitals etc should be frozen to prevent worsening of health outcomes.

Policy Tc7.6 Location and scale of development in Merton’s town centres and neighbourhood parades

Glad to see Haydons Road North Parade included as a Neighbourhood Parade. Please also ensure that neighbourhood parade and local centre facilities are mentioned when planning applications are considered eg Plough Lane development retail analysis failed to mention any small-scale local retail facilities. Doing so will also support objectives of Policy Tc7.9 Protecting corner/ local shops.

Strategic Policy O8.1 Open Space, Green Infrastructure and Nature Conservation

Policy O8.2 Open Space and Green Infrastructure

8.2.14. Allotments are recognised for their contribution to enabling healthy and sustainable lifestyles. Allotments not only offer biodiversity and conservation value but also allow people in urban 8-10 areas to grow fresh produce, offer recreational value and health and social benefits. We will therefore protect Merton's existing allotments.

Protection and enhancement of allotments should be considered when planning applications are made local to allotments eg industrial development and processes close to allotments can cause pollution that affects the ability to grow healthy, unpolluted edibles.

8.2.15. In line with the London Plan, the council supports the urban greening factor. Major planning applications should contribute to the greening of the borough by including urban greening features and high quality landscaping such as trees, green roofs, green and living walls as part of the site design.

Greening elements within a planning application should be enforced as critical to approval rather than ignored and quietly forgotten at build stage, as frequently happens at present (example: Reston's tree planting conditions in Weir Road have been ignored)

8.2.17. It is important to protect the existing green chains and improve links between and across open spaces. Such links provide important informal recreational opportunities for walking and cycling, create a safe and pleasant environment, and allow appreciation of attractive landscapes and features of historical significance.

Planning must take adjacent green chains into account when usage of land is at issue. Approving potentially polluting uses in or close to areas that are designated green chains or used for leisure purposes should be prohibited in order to protect public health(example Wandle River Walk!)

Policy O8.3 Biodiversity and nature conservation

8.3.2. **New development should avoid causing ecological damage and propose full mitigation and compensation measures for ecological impacts** that do occur. Where appropriate, new development should include new and or enhanced habitat or design and landscaping which promotes biodiversity. Improvements to biodiversity should not be restricted to conventional habitats but should extend to the increased use of green roofs and living walls; developments including these features will be encouraged where these are also in accordance with our design policies.

Negative ecological impact should be prohibited. Incorporation of green roofs and living walls where proposed in planning applications should be enforced.

8.3.4. Proposals should, **wherever possible**, have a positive impact on biodiversity by assisting in achieving targets in biodiversity action plans or by addressing matters in the relevant SINC management plan. Proposals that may affect a site of nature conservation interest will be assessed in the order as set out in London Plan policy: (1) avoidance, (2) minimization and mitigation and (3) compensation.

Omit wording 'wherever possible'. Proposals should always aim to either enhance biodiversity or, at the very least, not pose a threat to it or risk worsening the situation.

8.3.5. The value of front and back gardens in terms of biodiversity, climate change and flood mitigation is recognised. We encourage the use of permeable surfaces and the retention of landscaped areas with planting within gardens which makes for a more attractive green oasis and enhances the appearance of the property and road, and is better for the environment in accordance with our flood risk management policies. Retaining green areas helps reduce the 'heat island effect', reduces dust in the air, supports nature and protects against climate change.

Council should consider biodiversity implications when introducing policies which encourage residents to pave over front gardens, eg increasing price of on-street resident parking permits. This paragraph demonstrates the complete contradiction of Merton Council's statement. As a result of the huge hike in CPZ permits Merton will see a further devastation of front gardens where people have enough space in front of their homes but not enough money to pay for this drastic increase.

8.3.12. In line with our policy to protect and enhance the river Wandle and its green infrastructure network, development within 400 m of the Wandle Valley Regional Park boundary will be required to consider its relationship to the park in terms of visual, physical and landscape links, to ensure that new development enhances the accessibility and attractiveness of the park. Our aspiration is to ensure the arrangement of buildings within new developments complement the existing green corridors and prevent disjointed pedestrian and cycle accessibility, removing physical barriers such as railings and built form that disrupt continuity and access into and around the park. As identified in the design policies we will enhance the legibility and reinforce the green character of the borough.

This policy should be strengthened: development within or bordering the Wandle Valley should be forbidden from building anything that will detract from integrity of the Park and its surrounds visually or introducing operations eg concrete batching which prevent users of the Park from enjoying the peace, quiet and low-pollution levels expected of a green corridor. 'Air Polluting' industry near the river Wandle should be forbidden, particularly as this Riverwalk is going to be part of the London Regional Park project.

Policy P.8.9 Improving air quality and minimising pollution

This whole section is extremely disappointing in its weak and potentially ineffective approach to one of the biggest health threats of current and future years. Would like to see the Council requiring developers to submit their plans to rigorous checking, testing procedures to ensure that proposals are properly analysed for air quality and general pollution impact. Current environmental reports are flaky, incomplete and lack the necessary rigour to safeguard dangers to health and the environment. This section is the perfect chance to lay down strict policies that protect residents. These do not!

8.9.1 The council will require developers to explore ways to minimise any harmful and adverse environmental impacts of development, including during construction and demolition.

'exploring' ways to minimise harmful impact is weak and meaningless, failing to express the necessity for developers to respect the environmental implications of proposals and allowing them to proceed with potentially harmful projects despite the impact. This has been seen again and again in Merton. It is very obvious here that this 'Local' plan favours industrial development over our 'local' environment and the health of 'local' residents !

8.9.2 The design and layout of new development should endeavour to minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Therefore any noise and pollutant polluting activities or features such a plant equipment should be located away from sensitive areas, where possible to ensure that there are no detrimental impacts on living conditions, health and wellbeing or local amenity.

As above, the wording here is too vague. The overwhelming duty of developers should be to do right by users and occupiers, as well neighbours and the environment. What about sustainability and climate change?

8.9.3 Additionally, where there are already significant adverse effects on the environment or amenity due to pollution, sensitive uses should be steered away from such areas. However, **given the limited availability of land for development in the borough, this will not always be possible.** Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.

More meaningless phrasing here. Polluting operations should always be located away from sensitive receptors. It should also be stated that with the broad expansion of housing in the borough, approved by the Council close to sites currently occupied by industrial process plants (eg waste recycling), it is the Council's duty to ensure that industrial plants are not allowed to expand in such a way that will damage the health of residents of these new developments eg in Plough Lane area where 600+ new units are being built in the shadow of two polluting industrial waste recycling plants. Operators should NOT be allowed to further expand existing usage to the detriment of these residents whose housing has been approved by Council planners.

8.9.7 To meet the aims of the National Air Quality Objectives and the Mayor of London's Air Quality Strategy, the council has designated the entire borough of Merton as an Air Quality Management Area. Therefore, development that may result in an adverse impact on air quality including during construction, may require an Air Quality Impact Assessment in order for the council to consider any possible pollution impact linked to development proposals.

Impact assessments are currently often virtually worthless as they are written to the needs of the developer rather than being independent. The Council MUST better analyse these reports in future, refuse to take them at face value

and adopt a more critical, cynical approach to claims made in support of intrusive, potentially health damaging schemes.

Light pollution

8.9.15 As set out in the design policies, well designed lighting can enhance the street scene and public realm, extend the usable hours of sports and other facilities and improve the feeling of safety and fear of crime.

It can also contribute to sleeping disorders for residents in the vicinity, climate change problems and disruption for local wildlife. All should be properly and thoroughly considered. Merton has miserably failed so far by introducing 'white' light LEDs in street lighting and in particular in lighting near Nature areas like the Riverwalk where wildlife is adversely affected.

8.9.16 As set out in this policy, the council will support well-designed artificial lighting that maximises the positive aspects and and minimises its impact on local amenity

On what basis can the Council make a well-informed decision about this? Are there in-house experts? Without them, this statement is meaningless. It is clear that Merton did not bother to do any research whatsoever on the effects of 'white light at night' on human health and that of wildlife! The effects will soon become clear. When using public funds to invest in new lighting the very least one should expect is that Merton would have done their own research. I tried to explain and phoned before the street lighting roll-out but was met by a wall of ignorance! See her FYI: <https://edition.cnn.com/2016/06/21/health/led-streetlights-ama/index.html>

Site Wi12

The site is surrounded on all sides by strategic industrial locations. To the north and east of the site is Summerstown Road strategic industrial location (London Borough of Wandsworth), which includes a waste management site to the northwest. To the south and west is part of Durnsford Road/Plough Lane strategic industrial location (London Borough of Merton). The site has poor/moderate accessibility to public transport (PTAL 2/3). The road network, railway lines, river and utilities infrastructure in the wider area limit opportunities for improving access to and around the site. The entire site lies within an archaeological priority zone.

Public transport analysis is incorrect. This area is well connected by bus services, and train from Haydons Road. Other trains and tubes are easily accessible by public transport, on foot or by bike. This area should be identified for considerable cycle infrastructure improvements as it is well used by bike commuters heading to and from central London.

There should be an acknowledgement that while the area hosts a couple of SILs, at the same time levels of housing in the area - and thus the residential population - have expanded massively since the SIL estates were established. It is therefore appropriate to call a halt to expansion of B2 and waste recycling uses. Any new applications for SIL sites should be non-polluting, non-traffic generating to reflect changing nature of this area. Allowing population to grow yet failing to protect the health of this population is shortsighted and immoral.

Opportunities to resolve and improve the road network capacity, movement and local safety concerns.

List of opportunities should also include a commitment to improving air quality and general environmental outlook for this area as state above. Also, why no mention of the Wandle Valley green corridor, which runs right through the area? Enhancing and protecting the Wandle Trail should be a priority for this zone, soon to become the part of the London Regional Park.

Policy N3.7 Wandle Valley

It should be stated in this section that industrial usage of sites bordering the Wandle River should be closely monitored to ensure they do not harm environmental integrity or leisure usage of the area. Harmful, intrusive or polluting practices should be prohibited, with light industry favoured over manufacturing or heavy industry such as concrete batching, cement loading or other potentially harmful processes for sites alongside the Wandle River or Wandle Trail.

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