

Pountain. P

Comments on Merton Local Plan 22.1.19

1. Strategic Objective 2d: Place

“Ensuring local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area”

Aiming to be ‘not detrimental’ is unambitious. Development should improve health, safety and amenity for people, through a better local environment.

2. Strategic Objective 4.c: Environment

This says “Reducing or mitigate environmental impacts and pollution levels of air pollution and encourage improvements in air quality, particularly along major roads.”

We should have a much stronger statement on air quality. All levels of particulates are found to have a negative impact on health. Evidence is accumulating of how these particles pass through the lungs into every cell in our bodies and are linked to cancer, heart disease, dementia and poor learning in children. There are illegal levels of NO₂ along many of our busy roads.

We need to use the planning system to ensure that air quality is greatly improved and to reduce the exposure of people to poor air quality. Air quality should be given greater priority in planning decisions and if a development cannot make a positive contribution to air quality, it should not be allowed. We should not continue to make that trade off between people’s health and development. It is a false choice, because the technology is available to have both development and healthier air.

3. Strategic Objective 4.f & g: Environment

“Applying the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means;” “Exploiting the opportunities to utilise energy from waste”.

The Local Plan should include a pathway to reduce incineration and eventually to phase it out, as we move towards a circular economy. Incineration can be a disincentive to reducing waste. Some European countries are phasing out incineration, as they are finding that they have excess capacity, as recycling rates increase and less waste is created.

4. Strategic Objective 6: Economy

“ Supporting sustainable growth of the visitor economy for the benefit of local communities and promote the borough as an attractive and inviting place to visit and enjoy.”

Near the exit from Wimbledon station, there should be an information hub, to provide information about the many attractions in Wimbledon and Merton. The library currently has some information, but it lacks a dedicated facility to ensure that the right information is available (it has a mixture of information from all over London and only from a fairly random selection of local groups). Also, this information is not easy to find being at the back of the library and not advertised

out the front. The information stall in Centre Court is for businesses only and is in the wrong place for people visiting Wimbledon.

An information hub could provide the following services:

- visitor information
- planning shop – for information, discussions and ideas in-putted on Wimbledon town centre developments (as proposed by the Wimbledon Society's Vision 2040)
 - information about recycling, including a collection point for recyclable items that are not collected otherwise e.g. small electricals, coffee packaging

5. Strategic Policy HW2.1 Health and Wellbeing

Children are particularly vulnerable to poor air quality. Also, they are particularly exposed to it, with measures of NO₂ being significantly higher at child height than at adult height. Therefore, access to clean air should be included as an equalities issue for children.

6. Policy HW 2.2: Delivering Healthy Places.

The council wants to “*to promote the availability of healthy foods*” and supports the “*Mayor of London Healthier Catering Commitment*”.

Given the recent “state of the Nation” report from the Soil Association, it is clear that it is not enough to ask caterers or shops to provide fresh fruit and vegetables. Poor quality fruit and veg is unpleasant to eat and high in pesticides and so can actually put people off eating healthily. There should be a focus on food being of good quality, preferably local and organic. See <https://www.soilassociation.org/policy/stateofnation18/>

7. Policy D5.3 Design considerations in all developments

When planning applications are approved, they may have planning conditions attached which make the development acceptable. However, after a year or two, these conditions are often dropped. The enforcement regime should be strengthened so that there is more oversight to the process, so that the dropping of conditions does not happen ‘under the radar’. It should not be acceptable that a developer agrees to deliver something and then argues afterwards that the facts have changed and they will no longer deliver conditons.

8. Policy D5.3.a.xv Design considerations in all developments

“*Ensure ... CO₂ emissions are achieved*” seems rather unambitious. We should be aiming for zero carbon and exceeding expectations.

9. Policy D5.2.c Urban design and the public realm

“*The creation of buildings and spaces which are economically and socially sustainable, by offering variety and choice, and by being able to adapt to changing social, technological and economic conditions without the need for future remedial intervention.*”

Where is the environment in this statement about sustainability? This should be amended to read “buildings and spaces which are environmentally, economically and socially sustainable.... changing environmental, social, technological and economic conditions”.

We need to be building for a changing environment as expected from climate change and consideration for the environment should be included in every decision, especially development.

10. Strategic Policy W.6.3 Waste management

This makes no mention of 're-use' which is a better option than recycling. Lots of useful things are thrown away due to the lack of a facility at Garth Road (or somewhere else) that will take items for re-sale. There should be a commitment to set this up.

11. Policy O8.3.e Biodiversity and nature conservation

"Require, where appropriate, development to integrate new or enhanced habitat"

All new buildings at least 5 metres high should include swift nest bricks. Changes in building design has meant the loss of nesting space for swifts. Including a few swift nesting bricks in new builds is inexpensive. See <https://www.swift-conservation.org>

12. Policy O8.4 Protection of Trees

"Use Tree Preservation Orders to safeguard significant trees of amenity value"

There should be a Landmark Tree strategy. This would identify places where full sized trees would make a major contribution to the public realm. Large elegant trees are a landmark, are attractive, provide a home for birds, animals and insects, soak up a lot of water from the surrounding area and improve the local air quality. The amenity value of a full-sized tree is much greater than a series of small trees, which often have limited space and are severely pollarded. These landmark trees should have designated root space and should be looked after and protected from development. One existing landmark tree is at the entrance to St Mark's Place. This is a well loved tree – and we need a few more of those.

13. Policy CC8.12 Sustainable design and construction

Sustainable design should consider the health of the occupants inside buildings. The WELL Building standard provides a framework for this – see <https://www.wellcertified.com/>. This includes consideration of air, water, nourishment, light, fitness, comfort, mind and innovation when designing. It makes for healthier occupants, a more productive workforce and potentially more attractive workspaces. Also if Merton adopted a WELL Building standard for all new workplaces, then this would provide a unique attraction for organisations to locate in Merton.

14. Policy P.8.9 Improving air quality and minimising pollution

There is no mention of indoor air quality, which can have a major impact on health. Concerns are mounting about unhealthy emissions from furniture, carpets, building materials etc. and steps should be taken to protect occupants of buildings from this.

Also, there is no mention of air pollution caused by the use of chemicals, most notably in green spaces management where herbicides and pesticides are used. The general public may be breathing in harmful pesticides or be absorbing toxic chemicals through their skin, if they touch plants (as children often do) not knowing they have been sprayed. Harmful chemicals should only be used in highly controlled situations. It is not acceptable that people in Merton are unknowingly being exposed to harmful chemicals.

15.6.4 Transport

There is no mention of pedestrianisation in the plan. TfL has a new webpage which brings together the evidence of the economic benefits of walking and cycling and of pedestrianisation of high streets – see <http://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf> For example, people walking to the high street spend up to 40% more than people driving there. Also, retail vacancies can be reduced by 17% by pedestrianisation and other town centre improvements. Therefore how any development contributes to pedestrianisation should be explicitly mentioned in Transport Policy T6.5.a and policies on design and the economy.

Another important area is the role of regulation. There should be sufficient resources to ensure that regulations to stop pavement parking, idling and pavement blocking. There should also be clear information to the public so that they know how they can assist on reporting offences. Specifically on pavement blocking, each premises is issued with a licence saying how much of the pavement they can take e.g. for tables and chairs or movable signs. This information should be made public, so that people can know when a licence is being transgressed.

16. Policy T6.5.d

“Work in partnership with the council and TfL to deliver new high quality links or the enhancement of existing pedestrian and cycle routes/networks, including the Wandle Trail, Wandle Beverly Brook Link.”

The following should be added:

- a. An immediate improvement to transport infrastructure would be to instal wheel gutters up the steps of footbridges over railways, to help people with push chairs, wheeled shopping bags and cycles to use these bridges.
- b. The following routes should be developed:
 - i. a new dedicated cycle/ pedestrian route along the rail embankment (following the line of Crossrail 2) from Wimbledon town centre to the Wandle Path.
 - ii. new cycle routes over railway lines
 - iii. an improved cycle link between Wimbledon town centre and Wimbledon Common