

Thompson N

Overall impression

From a cyclist's point of view, this is a deeply disappointing document. Cycling and cycle infrastructure appears as an afterthought, maps fail to include cycle ways, expertise in catering for cyclists is clearly lacking and is indicative of a perceived general disinterest in cycling by Merton Council.

Faster roll-out of segregated cycling should be emphasised, maybe using cheap easily installed/amended bollards and paint initially. Allow any street that wants it, to become a quietway and supply the necessary materials to enable this. Allow any street that wants it to green up with parklets the permissions required to do so.

Instead of prohibiting or limiting outdoor seating in popular areas, try to pedestrianise or widen pavements with shared use for peds and bikes.

Some detailed comments:

'Transport connectivity' map (6-13) doesn't show any cycle routes or quietways.

Strategic Policy T6.4:

Why no concrete commitments to eg maintain, improve and expand the number of cycle routes, cycle lanes and quietways in the borough?

Why no targets of how a better-connected transport network will be created?

6.4.2 refers to LIP. This has not yet been published, or consulted upon so how can this document rely on it to 'deliver the Mayor's Transport Strategy'?

6.4.3 Must disagree here. Developers frequently wriggle out of their duties and the council allows them to do this (eg Plough Lane development: cutting out permanent cycle storage space, adding retail parking spaces, lack of detail on cycling provision in highways network). Tougher stance required here to ensure that public health is put centre-stage in street and public space usage and design.

6.4.4 No mention here of the 'last mile' principle encouraging eg parcel deliveries to a central HQ with final door delivery by eg bike courier.

'Longer distance destinations can more readily be made by public transport': this is so vague it has no meaning. A journey from eg Wimbledon town centre to Wisley RHS Garden cannot readily be made by public transport. Cars will always be necessary, but council measures and priorities can make bike or walking the easiest option when travelling locally.

6.4.5 'Freight is a major contributor to congestion' AND pollution AND poor quality of life AND deters people from making active transport decisions; 'essential that considerations are fully assessed and any impacts mitigated': so weak! Why not make a brave stand and assert that the effects of freight will be reduced by radical imaginative measures as necessary eg ensure all freight traffic in the borough meets ULEZ requirements, ensure weight-restrictions on roads are kept to etc?

Policy T6.5

Glad to read that Merton wants walking, cycling and public transport to be favoured options. So why not make a clear commitment to eg a fast roll-out of segregated cycle lanes, cycleway signage and improvements as detailed in survey analysis for the council carried out recently? Adopt a 'cycle-first, pedestrian-first' policy for all highways schemes and improvements and pledge to have them developed by experts who ensure they are fit for purpose?

Pledge to employ a 'cycle czar' or at the very least have a named councillor who has genuine interest in and knowledge of cycling issues? Pledge to consult Merton Cycling Campaign on every highways and planning application.

Consider planning applications on the grounds of facilities provided for members of staff/inhabitants who cycle regularly incl accessible shower facilities, kit storage areas etc.

Pledge to protect off-road and quietway cycle and walking routes from polluting processes; safeguard users of these routes from pollution by ensuring only light industrial use of neighbouring sites.

Potential Cycling Infrastructure improvements map (6-21) fails to include quietway route from Garfield Park to central Wimbledon via Garfield Road and South Park Road, also fails to show plans to incorporate cycle lanes on Plough Lane. Are others also missing?

Policy T6.6

Point b: this is already nonsense in that 'significant development' is already being sited in areas of low connectivity.

Point c: Submitted transport assessments/statements should be independently examined and checked rather than being accepted on face value. Officers should be prepared to accept local knowledge when submitted. Local people generally have a better idea of the situation on the street than remote officers who rarely visit and cannot know the everyday situation.

Point e: even where development does generate significant numbers of journeys, these should be prohibited if an area is already at, close to, or over capacity.

6.6.1 : should reference Wimbledon as well as Morden.

6.6.5 should specifically mention cycling

6.6.6 developments likely to attract high vehicle movements should be questioned on how they are keeping these movements to a minimum and be challenged on their choice of location and how they run their business.

Car parking

6.7.6 electric vehicle charging points should be located in the road not on the pavement.

6.7.9 encourage 'last mile' transport hubs whereby deliveries can be made to a central point with last mile delivery taking place by bicycle courier.

Transport infrastructure

6.8.1 add something to emphasise that the council will prioritise provision of protected cycleways, support education about and promotion of sustainable transport.

6.8.3 add 'further, and improved, cycle routes' in here please.

6.8.7 this paragraph needs considerable expansion, it reads like an ill-considered afterthought. Improving accessibility by walking, cycling and public transport should apply to all areas of the borough, on all routes, and between all centres. Have you ever tried cycling between Wimbledon and Morden? It is terrifying. Key routes like this should be prioritised for cycling improvements, as should journey to school routes

Electric bike hire should also get a mention as this could be useful in hilly areas such as Raynes Park and Wimbledon, it could also help encourage older people or those with disabilities to use bikes more. An electric bike 'taxi service' should also be introduced for the Wimbledon Tennis Fortnight.

Expanding the cycle network deserves a chapter all to itself. The council should pledge to appoint a cycle czar who can push the council to the best for cycling in every policy and plan.

Future transport infrastructure improvements map: why not a single cycle lane included here?

Strategic Industrial sites

There is an inherent contradiction with the Council's Strategic Industrial Sites in Plough Lane and Durnsford Road, and its identification of this area for major residential expansion.

I urge the Council to limit heavily industrial development on these sites, and 'freeze' polluting operations which lead to a worsening of air quality, both by the processes themselves and also from any associated increase in traffic.

The need for office space and start-up space could easily be accommodated at these sites, while heavier industrial expansion should be encouraged to take place in less densely populated areas.

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 should not be allowed to expand and should be gradually phased out.

Sustainable transport

Streets around schools should be the target of air quality improvements including car-free periods at the start and finish of the school day as a minimum.

Merton Council should adopt a cycle-first policy for all streets, ensuring that cars use is discouraged, through-traffic is minimised, and speed limits are self-enforced through use of street engineering that makes it difficult for motorists to exceed the

speed limit. Be brave!: Car use should be made difficult and slow in order to force more people out of vehicles and onto public transport, their feet and bikes.

Other comments on specific policies:

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.

Support businesses that obey the rules and live happily alongside residential/environmental neighbours, butr come down heavily on those that do not. Local amenity MUST be protected. Businesses MUST be forced to behave like good neighbours.

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, climate change and effects on residential amenity

Policy Ec 7.2 Employment areas in Merton

7.2.2 Merton's main employment areas are the designated town centres and designated industrial sites (both the Strategic Industrial Locations [SILs] and Locally Significant Industrial Sites [LSIS]) and these are designated on Merton's Policies Map.

Development on SILs should be limited if SILs are in increasingly residential areas. SILs were established in a different time: fewer people lived nearby, traffic was less of an issue, air quality was less of a problem. Times and conditions have changed; so should planning imperatives. Local Plan should reflect this reality.

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

Surrounding situation for these two SILs has changed a lot since they were established. Times and conditions have changed; so should planning imperatives. Local Plan should reflect this reality.

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.

Support for these uses should depend on the neighbourhood they are based in. B2 class may now be inappropriate is large housing developments have been approved nearby, or if AQ objectives are being failed.

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.

But bear in mind too that proximity to strategic road network may bring further AQ problems so 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.

False supposition here. Office developments don't necessarily engender traffic congestion, parking and pedestrian movement issues. Ease of access by public transport means workers can arrive sustainably.

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.

If, however, these activities do not already take place on an industrial area close to residential, they should not be allowed to start doing so where residential usage of surrounding area is expanding eg Plough Lane.

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 grown 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.

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.

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.

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.

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.

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.

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.

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.

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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