

Merton Conservatives response to Air Quality Supplementary Planning Document (SPD) consultation

We welcome the introduction of an Air Quality in Planning SPD. We think it should be modified to reflect the following comments.

We note that paragraph 3.1 & 3.2 is repeated at paragraph 3.5/3.6. We assume this is an error and should be deleted. We would also expect that the final approved document will have no further grammatical errors.

The improvement of air quality (reducing NO₂ and PM₁₀/PM_{2.5}) must be a priority in every commercial or infrastructure based planning approval, with neutral impact developments only being allowed by exception and after ensuring strong mitigation and/or greening measures. Rigorous monitoring must be carried out at all locations of poor air quality with the *regular* publication of relevant data, clearly set out for ease of quick reference by residents and developers to assess each site's suitability in terms of air quality and required measures to mitigate. For commercial, infrastructure based and residential developments, urban greening, plantings and an *increase in tree cover* must be ensured by condition, with the use also of planters, rain gardens, living walls and other green infrastructure, as well as the protection and restoration of pocket parks.

Any new school site proposed must be fully consulted on with the public and residents and any decision must take into consideration the views of all groups on the council and of relevant residents' associations. Further new school sites should not be approved at busy roads suffering poor air quality.

In the interests of the Borough doing what it can to lead on mitigating climate change impact and encouraging wellbeing, ambitious levels and forms of sustainable travel must be maximised. Each planning application which seeks to add parking spaces should be mandated to have *each* space having a charge point installed. This will help the rapid transition to cleaner electric cars, and mitigate the environmental impact of the development. The council should set out ambitious targets to deliver a high (majority) percentage of EV's in the Borough within the term of the new Local Plan. Businesses seeking planning permission on the industrial estates and elsewhere should only receive planning permission if they can demonstrate that their vehicle movements do not add to air quality concerns, i.e. those with light or heavy goods vehicles should show how they intend to clean up their fleets, and what environmental measures they can contribute to the borough by way of S106, CIL or planning conditions.

To encourage modal shift to cycling in the borough the council, business and any new developments should provide secure, covered and fit-for-purpose bicycle storage units and bicycle stands, including where possible suitable docking/charge-points for e-bikes. Larger developments should build in appropriate cycle lanes/paths on the site up to where it joins the public realm.

Heating and powering homes is one of the main culprits of bad air quality (both indoor and outdoors), therefore planning applications should seek to only use the cleanest modern gas boilers which are future-proofed to take hydrogen gas (as the national gas network is likely to start having hydrogen blended in), or air/ground-source heat pumps. Where possible wood-burners, other biomass burners should be restricted as they are bad for air quality. Additionally there should be a fabric-first approach in design so that homes are well insulated and do not add to pollution problems. Flats in particular face challenging indoor air quality, so developers building these in busy areas should by condition ensure there is mechanical air filtration/air-conditioning installed. This will make flats more liveable in busy areas.

