

Consultation statement on the draft  
Air Quality Supplementary Planning  
Document (SPD) public engagement  
May 2021.

## 1. Introduction

- 1.1 On the 7<sup>th</sup> October 2020, [Cabinet](#) approved public consultation on the draft Air Quality SPD. The consultation started on 28<sup>th</sup> October and closed on the 8<sup>th</sup> December 2019. We received a total of responses of which 34 responses. The consultation was carried out in accordance to planning legislation temporary changes due to the Covid-19 pandemic.

## 2. Engagement methods

- 2.1 This section looks at the consultation and how the council raised awareness of the consultation. The consultation was carried out in line with Government Coronavirus guidance and Merton's Statement of Community Involvement (temporary COVID changes).

### **Raise awareness.**

- 2.2 The Council notified all the names of individuals, groups and organisations held on the Local Plan database<sup>1</sup>. These are made up of residents, businesses, faith, environmental, civil and community groups. The names on this database are persons who have indicated they wish to be consulted on planning development documents in accordance with General Data Protection Regulation (GDPR).
- 2.3 During the consultation, the Council ran consultation awareness messages on Merton Council social media platforms such as Facebook and Twitter. In addition, the Council placed adverts on Facebook. Residents/business who are signed up to the council's iConsult 'get involved' consultation platform also received notification of the consultation. The database has over 2000+ subscribers. Officers also raise awareness at stakeholder and partner meeting.

### **Building understanding, consult and communicate.**

- 2.4 We had a dedicated [webpage for the draft Air Quality SPD](#). Officers were available to virtually attend community groups/association meeting and forums. However, we did not receive any invitations or request to address such meetings.
- 2.5 Merton Councillors were briefed by way of Merton's democratic process of the SPD, its role within the context of planning and its importance to the health and wellbeing to all communities, businesses and planning. A dedicated Council officer was available to answer any questions on the document and consultation.

## 3. The online survey analysis of responses

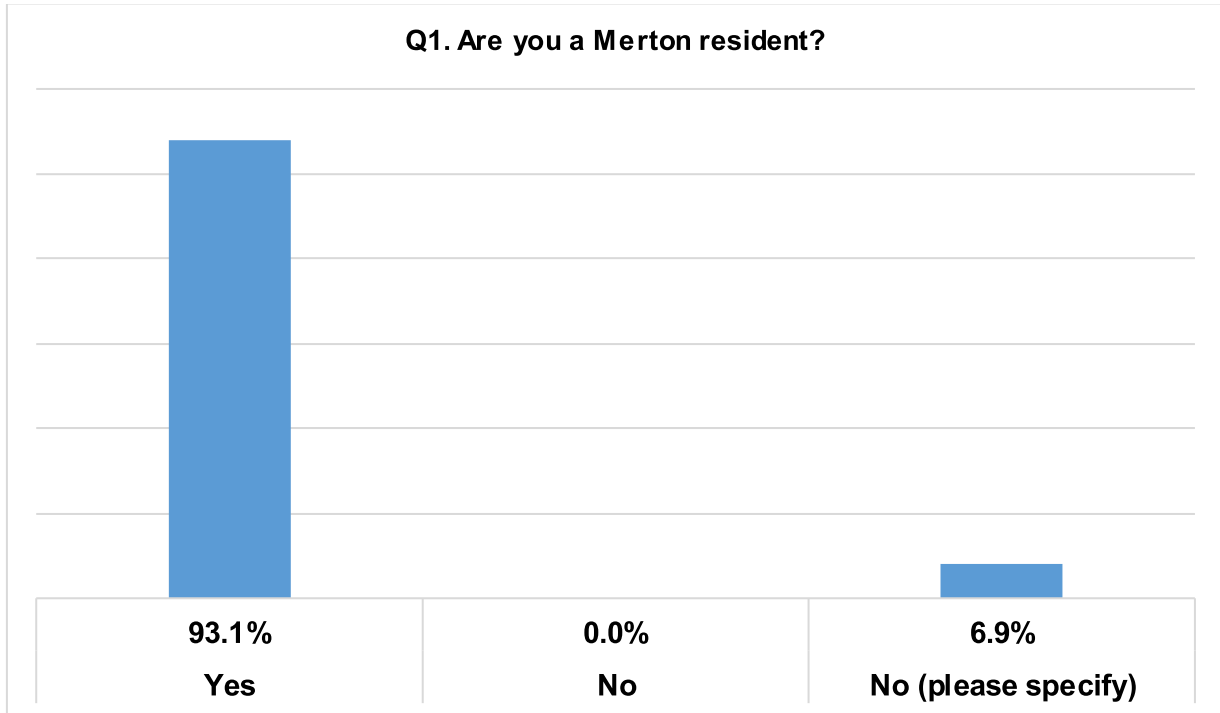
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<sup>1</sup> If you'd like to be added to our Local Plan consultation database.  
Email: [future.merton@merton.gov.uk](mailto:future.merton@merton.gov.uk)

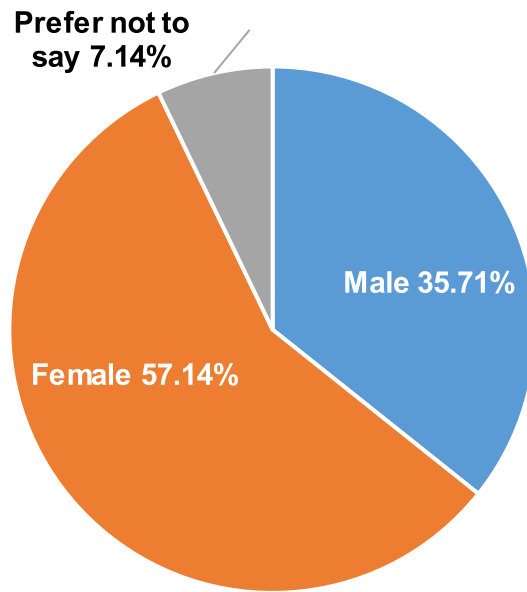
3.1 Some comments received were not for the scope of an SPD but were however, useful for the development of the new draft local plan.

3.2 The following section looks at the xx online response via Survey Monkey portal. We used this survey portal as it is easy to use on several platforms such as mobiles, tablets and it is a trusted portal.

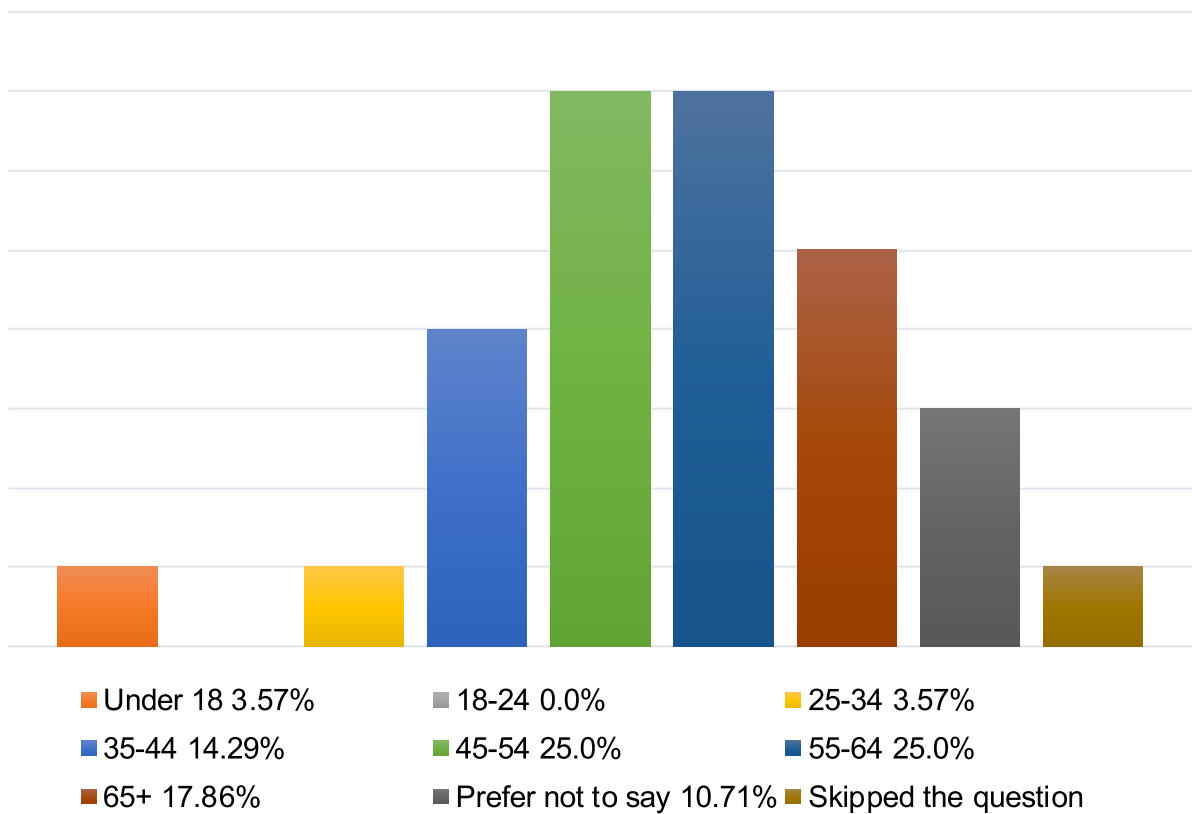
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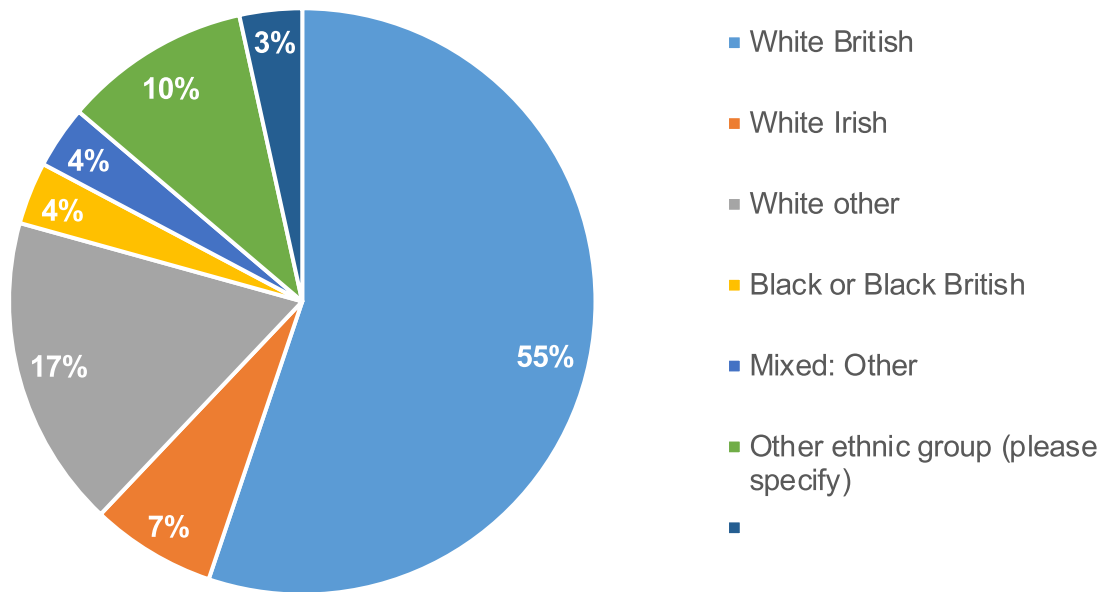
### Q2. What is your gender?



### Q3. What is your age group?



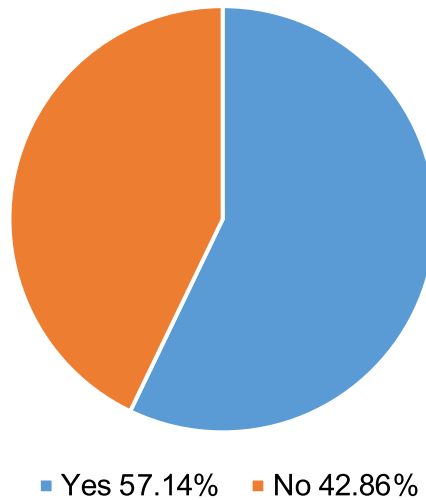
Q4. What is your ethnic group?



Q5. Do you have a disability or learning difficulty?

Answer Choices	Response (%)
Yes	0.0%
No	100.0%

**Q6. Would you like to be contacted by us about future planning document consultations? Responses**



3.4 Q7 and Q8 asks for personal details.

3.5 **Q9. Sections 1 - 4: provides an understanding of air pollution and national legislation and national, regional, local planning polices and guidance.**

3.6 Comments covered a range of areas/topics from Merton's Planning Application Committee, the need for more trees in Merton, cycling and cycling storage and climate change. The bullet points below are a summary of comments received –

- Merton regularly allows trees, shrubs and entire eco-systems to be removed for development in Wimbledon Village. With sites being filled with ever larger properties including basements, the amount of green space is constantly being reduced. The attitude of the PAC (Planning Application Committee) in this regard needs to change to prevent further climate change. Flooding because of basement excavation is commonplace and far more stringent policies are required with quick enforcement when rules are breached. S73 applications are just waved through - this should no longer be the case. 4.9 - Yes Merton - please do this!
- Imperative that Planning is refused if AQN (Air Quality Neutral) benchmarks cannot be met, including for residential developers.
- Most residential developments in Wimbledon Village result in an increase of over 100m<sup>2</sup> so the CIL (Community Infrastructure Levy) should be charged in all these instances. Not sure that this has happened thus far!
- Planning policies should include cycle storage provision including for tricycles, hand cycles, tandems, cycle trailers and other cycle options which promote inclusivity and practicality for cycle use. Plans should include provision for charging e-bikes which are known to improve the numbers of people aged 50+ who cycle.
- Planning approval should have a much stronger focus on sustainable/green building and zero carbon homes. For example, the CIL should be charged at a lower rate for home that are built to a zero-carbon standard. As well, given

that the majority of the air pollution in Merton is from vehicles, there needs to be much more education about this - along with policies that will reduce traffic and increase electric car usage.

- The Government has recently relaxed planning laws which does not improve air quality. Consent should not be given for parking places or paving front gardens.
- Yes, broadly speaking I support.

3.7 **Q10 Section 5: Air quality Assessments: Do you have any comments on this section?**

3.8 Comments covered a range of areas/topics from development proposals, the need for more trees in Merton –less cars and zero carbon. Summary below:

- "Major" developments and their impact on air quality are addressed in this section. However, I think that there should be much more attention paid to smaller developments.
- if such dense developments are to be put into residential neighbourhoods the new units/homes going in should be required to not produce any more pollution than that produced by the previous single-family home on the same site. This would require the building of zero carbon homes.
- Wood burning fireplaces and outdoor fire pits are increasing popular - and having 5-7 units burning wood rather than one family home adds even more to the pollution problem. That much scrutiny needs to be applied to these smaller developments in residential neighbourhoods.
- We need more trees and fewer cars.

3.9 **Q11. Section 6: Development and building design principles: Do you have any comments on this section?**

3.10 Comments covered a range of areas/topics from development proposals, concerns about paving over front gardens and wood burning fires. Summary below:

- We feel there could be further guidance on when and how the development principles in para 6.2 and the requirements in the construction phase set out at 6.4 would be applied in practice.
- Poor air quality caused by construction is often raised by residents, but it is unclear how this could be controlled by the SPD at a grant of planning application stage - construction management and logistics plans usually being agreed by condition.
- Obviously, the SPD could influence the officers charged with agreeing those plans, but residents are left powerless to challenge the actions of developers on these grounds. That said, we are pleased to see in para 6.4 the suggestion that contribution to any additional resources required for regulatory monitoring might be required.
- Heavy machinery is in use for the minimum possible time during developments (i.e. allow a longer working day). Deliveries outside of peak traffic hours a concern.

- There is a real lack of understanding about the impact of wood burning on air quality and with so many people being at home through the winter months and wanting to feel "cosy", there are genuine issues with smoke pollution/particulate matter. I believe that Merton should look at restricting outdoor burning of garden waste and that wood burning stoves in homes should be eliminated in any new builds. There should also be more education about how burning wood contributes to particulate matter pollution in Merton.
- Development Design - Disagree to include Canteens in this list - they should be away from the road and hopefully have outdoor space as well (in line with good Covid practice). Outdoor space would make Canteens a far better place to eat, mix and socialise.
- Please, no more paved front gardens.
- Provide safe, secure, preferably internal bike storage and other aids to journeys via active travel.
- Ban all basement extensions. The equipment used produces highly toxic particulate diesel fumes that pollutes the entire neighbourhood.
- Seems restrictive to put non-habitable rooms at front of building better to reduce outside sources of pollution or not build at all Biomass/biofuel should be discouraged. As should fossil fuels.

3.11 **Q12 Section 7 Green infrastructure: Do you have any comments on this section?**

3.12 Comments covered a range of areas/topics from the need of more trees in the borough, low traffic neighbourhoods, cycling routes and the need for more green infrastructure. Summary below:

- We agree with the importance of urban vegetation -We need more wild areas.
- Greenery is welcome. Should consider whether hard standings within developments (such as car parking) are absolutely necessary.
- Street trees are needed, more low traffic neighbourhoods, safe cycle routes - there is no safe cycling route to my school for me.
- Coordination with traffic plans is needed - there is no point in having green infrastructure when traffic flow inefficiencies immediately negate their effect.
- There should be more requirements for maintaining greenery in planning processes.
- Gardens should not just be paved over for cars.
- They should be requirements to maintain some level of plant life that can help reduce pollution. As well there should be a big educational campaign about the positive impact planted roofs, green walls, hedges and plants can have in trapping pollution.
- An easy "go to" list of top trees and plants for this purpose could be put together by the Planning Council. As well, the Borough of Merton should set some targets for increasing greenery that will help combat pollution. Many people are much more focussed on their homes and gardens given the COVID lockdown - it is an excellent time to education and support individuals to green their homes and communities.



- PAC needs to fully the role of green infrastructure and air quality by refusing planning applications that require the total annihilation of gardens, with developments taking up the entire plot so there is no room for re-planting. Retain as much of the vegetation as possible to help the ecosystems and the planet.

3.13 **Q13 Section 8 Construction: Do you have any comments on this section?**

3.14 Comments covered a range of areas/topics from construction spill over on the streets and banning extension of large homes. Summary below:

- Speed up construction times by cutting red tape.
- Improved exhaust systems in restaurants, deliveries out of normal daytime hours to improve traffic flows and reduce NO2 build up from waiting traffic.
- Paragraph 8.5: This is what I have been suggesting all along and would make a positive difference to the local access roads frequently used by lorries and skips. This should apply to all developments no matter how small, as they all use skips and lorries, scaffolding etc. School streets should be always avoided if possible.
- There should be a limit on how far people can extend their houses.
- There are no specifics about dust creating machines abound on construction sites and must be regulated - cutting machines, saws, grinders, and sanders should always be operated in airtight areas with filters.
- Ban extensions and developments of homes that are already huge. Merton Planning/Building Permit department has allowed a large extension and re-siting of the driveway, which will remove 2-3 public paying parking spaces. This constitutes a removal of parking fees that go to the council's public purse, for the benefit of one huge homeowner.
- Construction should be discouraged from spilling onto the public highway. Where this is unavoidable road space should be prioritised for pedestrians taking special account of those with mobility issues. Circuitous diversions to maintain "traffic flow" should be avoided.

3.15 **Q14: Section 9: Transport: Do you have any comments on this section?**

3.16 Comments covered a range of areas/topics from the need to encourage more walking and cycling, reducing electric vehicles, charging points for electric bikes, the number of cars on the roads and car free developments. Summary below:

- Sensible and achievable initiatives
- We should all walk, cycle and use public transport more. We should have more car hire schemes to discourage private ownership of cars.
- Fewer cars on the road - reduce congestion, safe bike storage, good lighting and surfaces on bike/pedestrian paths - for example, Morden Hall Park is poorly lit and very muddy.
- Too much focus on EVs (electric vehicles) which have a high environmental build cost, add to congestion, deposit tyre and brake particles and use

valuable pavement space with chargers. What is needed is massive provision for safe secure parking and charging of e-bikes and safe secure parking and storage of bikes in general.

- Nothing on cycling infrastructure. Focus on electrical vehicles which are not reducing particle pollution.
- No real answers on how traffic will be reduced.
- They have slowed traffic to 20 miles an hour, which causes more air pollution.
- Do not allow your younger council employees to produce mad plans to encourage cycling by 60–95-year-olds for their health and charge these senior Merton residents huge parking permit fees for parking on the street outside their homes, just because they cannot afford to buy a newer type of car. Wealthier residents are not affected by higher street parking fees; they have the resources to buy electric cars/ newer petrol cars, they have been allowed/encouraged by the council's Planning/Building Permit Department to pave over their driveways, for free parking (at the taxpayer's expense, since the parking revenue from street parking is no longer payable). Use means testing (annual income from tax returns) to determine street parking permit fees on a sliding scale.
- Given 7.2 The Mayor's Transport Strategy includes the ambitious target that 80% of trips in London are made on foot, by cycle or using public transport by 2041 - We need VASTLY reduced motor traffic levels as this massively (overwhelmingly) prevents people from cycling.
- Vastly improved secure cycle parking facilities everywhere to reduce the enormous levels of bike theft. Facilitating EVs will not reduce traffic levels and given that the existing vehicles will be on our roads for 20 years, it will not reduce pollution as congestion will remain extremely high. EVs are heavy and emit fine particles from tyres and brakes more than fossil fuel powered vehicles, Electric bikes/cargo bikes are hugely more efficient and should be massively encouraged.
- We feel that para 9.5 could be stronger in setting out the expectation that developments must demonstrate how they will result in an improvement in air quality (we are concerned that the reference to "must play their part in ensuring that air quality in these areas does not worsen" leaves open the door to developments that aim for the bare minimum). We are concerned by the implications of para 9.7 - the aim should be to improve these areas, not simply avoid certain development in these areas.
- Traffic flow should be aimed at speeding the flow of traffic out of the borough (i.e. longer phased lights at peak times for traffic heading out of the borough). Rigid enforcement of road works that block major arterial routes in the borough to avoid the situation where lights are erected on a Thursday Night /Friday, works begin (Hole dug) on Monday, repair Tuesday/Weds, hole filled on Thursday, road surface repaired on Friday, Lights taken down Monday/Tuesday. This farce is repeated regularly across the borough and regularly leads to long avoidable traffic delays and massively increased NO2 emissions. Work on major arteries should be 7 days a week as air quality is the most important factor.

- Again - the focus seems to be on major developments. Obviously, these are important, but small 3-10 home developments should also be held to a higher standard. These smaller developments triple and quadruple the number of cars on small residential streets. The cumulative impact of many of these smaller 3-10 home developments can be quite significant.
- The Transport section says "All developments proposed in or next to these areas must play their part in ensuring that air quality in these areas does not worsen and must contribute towards an overall improvement in air quality. Therefore, development within these areas need to robustly demonstrate that the impact of both direct and indirect emissions can be fully mitigated." But from what I have seen in our neighbourhood, these considerations are not coming into play.
- I do not think it goes far enough on private parking. High PTAL (Public Transport Accessibility Level) areas should aim to be car free. Some space for disabled/ shared ownership is ok but careful consideration is required to balance against greening requirements. Note PTAL can be inexact. It should be used as a guide with local knowledge of planners/committee members allowing discretion. Where there is doubt it should err on the side of caution as "all cars are bought to be driven" (as set out in 2019 parking consultation Q&A) and will contribute to congestion and particulate emissions.

## Other submitted responses

3.17 We received responses via email (not through the survey monkey portal) below is a summary of the comments.

### ***Wimbledon Park Residents Association***

- The opening part of the document contains an excellent account of the consequences of air pollution.
- In item 5.12 entitled The AQA (Air Quality Assessments) should include the following added requirement; The predicted modelling of air pollution should estimate the errors due to uncertainties of traffic flows and other variables as well as giving the correct statistical errors which arise in their analysis. The developer should also comment on these uncertainties. In particular, the developers should conform to paragraphs 7.536-7.546 and the associated tables in Technical Guidance LAQM.TG (16) of DEFRA.
- Merton should carry out a review of its Air Quality Focus Areas (AQFA) to see if they really are areas of high air pollution, have high numbers of receptors and are in places where important future developments that can contribute to air pollution are likely to be sited.
- The wording in 9.6 concerning parking permits seems very restrictive and one wonders if it holds in Merton's established AQFA's.
- It would have been good to see more information on air pollution resulting from residents burning wood fires in their homes, bonfires in their gardens and fire pits. How will Merton enforce, the weak existing restrictions to the maximum possible. Can one forbid fire pits, for example, and what can be done to further tighten control polluting fires in resident's homes, of which

there are still quite a few? The full enforcement of the forthcoming restrictions of sales of wood by shops and garages should be easy and it would be good to know how Merton is going to do this.

- It would be much better if Merton Council were to find sites further to the south where the waste could be processed close to where it is generated.
- It has become clear that the Waste processing sites in Weir Road have led, to exceptionally large numbers of waste carrying HGVs on local roads.

### ***Transport for London (TfL)***

- As well as requiring new developments to contribute towards public transport improvements there should be an expectation that developments will incorporate measures that support active travel and provide contributions towards active travel improvements where appropriate TfL welcomes the requirement to provide cycle parking in accordance with the London Plan as a minimum and the need to make provision for larger and adapted cycles. It would be helpful to clarify that cycle parking should be designed in accordance with the London Cycling Design Standards.
- The final bullet point should also state clearly that car free developments will be encouraged and where car parking is provided in new developments this should be minimised in line with policies in the Publication London Plan
- Additional bullet points could be added to state that the Healthy Streets Approach would be adopted for new developments and improvements to streets or the wider public realm and to highlight the role of Low Traffic Neighbourhoods in Merton
- Para 9.3 Electric Vehicles TfL welcomes the requirement for car parking to be provided with active and passive electric vehicle charging facilities consistent with the Local Plan and London Plan.
- Para 9.6-Air Quality Focus Areas (AQFAs), Low Emission Neighbourhoods (LENs) and Clean Air Zones (CAZs) TfL supports the requirement for all development in these areas to be car free although we would not want to see car free development limited to these designated areas. The car free requirement should be reflected in the Local Plan. TfL also supports the restriction on parking permits being issued in neighbouring CPZs.

### ***Merton Conservatives***

- The improvement of air quality (reducing NO<sub>2</sub> and PM<sub>10</sub>/PM<sub>2.5</sub>) 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.

- 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 indoors 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 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.

### ***Environment Agency***

- We understand the SPD is focused on new development however several existing developments require upgrading and regular reviews to ensure business is not contributing to poor air quality. We have raised these issues and opportunities in our input to the South London Waste Plan to ensure high standards at all waste management sites.
- Close partnership working and joined up working and joined up enforcement actions to ensure high environmental standards and preventing poor compliance with planning and permitting regimes. A good example of this is the ongoing joint Merton Council and Environment Agency action days to address issues at industrial estates such as Weir Road and Willow Lane. Air Quality monitoring is ongoing in the Weir Road area following complaints and

we will continue to share this data, evidence with you, and agree joint actions to manage air quality issues.

- Ensuring businesses are aware and are adapting to climate change and impacts of longer drier summers which require adaption and promotion of urban greening in new development and retrofitting in existing developments.
- We recommend awareness raising to encourage residents and businesses to sign up for air quality alerts and air quality forecasts. <https://uk-air.defra.gov.uk/>
- Raising awareness on the potential for construction and demolition sites becoming illegal waste sites. We recommend the Air Quality Action SPD references this ongoing issue and the need for high standards and visible security on vacant sites to manage this and prevent sites becoming illegal waste sites through trespassers gaining access and creating illegal waste sites which the landlord can be responsible for clean-up costs.