

I refer to the above named planning applications and would like to voice our serious concerns.

We believe that these are two more premature planning applications. Submitted well before the essential infrastructure is in place.

It would be much better if any plans for the development of these two sites are postponed until the public transport improvements are in place and the overall layout of development along Scrubs Lane can be properly planned.

The applicants are trying to get planning permission for over 210 flats on two very small sites but with little thought as to how the residents will be affected by existing noise sources and how the local road infrastructure could cope with all the additional pedestrian and vehicle movements from the houses and commercial premises proposed.

In the meantime with the potential to cause major problems for both Powerday and ourselves. Threatening the existing waste recycling capacity.

You will appreciate the importance of our sites to the Waste Recycling Capacity of London and how they are essential if this part of the city is to comply with undertakings that it has given to neighbouring authorities that it will process more of its own waste within its boundaries.

As previously discussed the EMR site recycles a large percentage of London's post consumer Metallic Waste and fridges. It has a capacity in excess of 370000 tonnes per annum and make up the vast proportion of the Hammersmith and Fulham's and Kensington and Chelsea Councils Waste capacity as detailed in the four councils "West Riverside Waste Apportionment Engagement Statement" from December 2015.

We appreciate that the wider development of the area necessitates us moving but feel that as previously discussed it will also be better if this is resolved much earlier than 2029 when our lease comes to an end. Indeed our strong preference is that the early identification of an alternative site for ourselves should be a crucial part of any early proposals for the area.

Until an alternative location for the EMR site is identified it is essential that you take every step necessary to protect it and the Powerday sites from inappropriate neighbouring development.

We feel that the applicant appears to have

1. Designed the block with one objective which is to maximise the site value and without reference to its location or planning policy. As others have pointed out it would set a very bad precedent for future scheme in the OPDC area.
2. Understated the potential effect of the noisy activities in the area on the proposed residents.
3. Underplayed the potential effect of all the additional housing and commercial premises on the on the local road network.

I would comment on our various concerns with these planning applications as follows

1. **Height and density:-** The application contravenes a number of policies within the London Plan, Hammersmith and Fulham Core strategy and the draft local plan as regards height and density. I am also told that the draft OPDC plan would prescribe a much lower or medium density for such a periphery site and which for the foreseeable future will continue to be so poorly served by public transport..

2. **Noise :-** We believe that the applicant has significantly under assessed the needs for the screening of the proposed flats from existing noise sources.

Waste sites are by their very nature very noisy however it is essential that the ongoing activities be recognised with substantial noise mitigation incorporated in any proposal for the early development of neighbouring sites for residential..

- a. We have not seen any evidence of modelling to show any noise maps for the upper levels and all measurements appear to have been taken at ground level where they benefit from street level screening.
  - b. Indeed there appears to be no mention of the noise from our site even though this is something we would have expected.
  - c. We are very surprised to see that the applicant claims that the flats will benefit from a “large acoustic barrier on the eastern perimeter of Capita Waste” in paragraph 7.4.17. However has failed to recognise that it will provide little assistance when the waste company is overlooked by a twenty two story block of flats.
3. **Transport:-** An image on a front cover of a Transport Assessment which shows the blocks of flats as being on a very quiet road with cyclists, small children, dogs, trees and pedestrians easily crossing the road gives absolutely no confidence in its contents!!
- a. In fact Scrubs Lane is an extremely busy road with large numbers of vehicle movements going past and many HGV’s manoeuvring into and out of the EMR / Powerday access road which is directly opposite the schemes proposed.
  - b. There are currently major parking problems on the road. The absence of any off road parking proposed in the development and particularly given the lack of public transport will make the position much worse.
  - c. Transport for London classify this part of Scrubs Lane as falling into almost the worst access Level 1b with the only public transport serving the site being the bus route 220.
  - d. I am surprised as to the claims that the position will significantly improve. There is still considerable uncertainty as to when and whether the West London line can be improved with a new station at Hythe Road. The Old Oak station for the Elizabeth line and HS2 will not be delivered for many years.
  - e. Has the developer given any undertaking that they will contribute to the cost of this infrastructure or are they expecting it to be provided wholly at your expense and at no cost to them!!.

As indicated above we feel that it is inappropriate for development of these sites to take place now and it would be much better if such schemes could be postponed until the infrastructure is in place and a comprehensive scheme for Scrubs Lane can be developed.

Unfortunately we did not receive formal notification of these two planning applications even though they are directly opposite the access to the Powerday and EMR site. I would request that in future we be consulted on all applications made in this part of the OPDC Area.

Regards

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