



**APPLICATION FOR PART B ENVIRONMENTAL PERMIT FOR WATERSIDE WAY
A response by Wandle Valley Forum to the application by Cappagh to London
Borough of Merton
Application number DM2018/00160
December 2018**

1. Wandle Valley Forum provides support and an independent voice for over 120 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle.
2. Wandle Valley Forum has reviewed the proposals for a permit to operate an installation for unloading bulk cement into storage at the Waterside Way site. This is immediately adjacent to an important location in the Wandle Valley Regional Park marking the end of the Graveney, a key tributary of the Wandle. The heavily used Wandle Trail runs past the site and it is alongside a key location where people stand and view the confluence of the two rivers. We recognise the need for concrete and cement storage and batching facilities in the area but have significant concerns over the likely impact and believe this to be a cramped and unsuitable site in too sensitive a location. Our concerns are exacerbated by the lack of consideration given to the two rivers or the Wandle Trail in the material supporting the application.
3. There is a history of mismanagement of the site, including serious incidents affecting public enjoyment of the Wandle Trail. The incident shown in this [video](#) recorded by a member of the public enjoying the Wandle Trail was not reported by the site operator to the Environment Agency or Merton Council. We are not aware that the two cement silos on the site or the current handling of material has been authorised. We believe this provides clear evidence that the site operators does not meet the requirement of The Environmental Permitting (England and Wales) Regulations 2010 that "*Operators should be technically competent to operate their installation*" (para 11.22). It is clear from Defra's guidance that the operator's track record and management practices are relevant to this consideration.
4. As a result of the combination of the poor track record of the site operators and the sensitivity of the location adjacent to the river and the well-used Wandle Trail we ask that this application for a Part B Environmental Permit is refused.

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Please respond to Chair, Wandle Valley Forum, c/o 43 Bramcote Avenue, Mitcham CR4 4LW