

Comments of Wimbledon Park Residents Association

on the Draft Air Quality Supplementary Planning Document (SPD) November 2020

- [1] The opening part of the document contains an excellent account of the consequences of air pollution.
- [2] Certain air pollution assessments submitted to Merton Council by developers have had such large errors as to render them meaningless. In item 5.12 entitled The AQA should include the following additional 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.
While planning officers would not be expected assess the statistical errors on applications this requirement places the onus on the developer to give air quality assessments that are valid. Should they give incorrect errors and this becomes apparent then the application can expect to be rejected as would be the case if they had given incorrect traffic flows.
- [3] 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. As we have spelt out in our objections to the South West Waste Plan 2021-36, the waste processing sites in Weir Road were judged favourably as they did not affect the nearest AQFA in Wimbledon Broad Way which is 1.5 km's away. This was clearly an incorrect conclusion. Given the large number of developments that are taking place in this area and its very high levels of air pollution it would be desirable to have a AQFA adjacent to Plough Lane, the top of Haydons Road, Gap Road and the bottom of Durnsford Road. The Waste sites in Weir Road should be reassessed with reference to this new AQFA.
The wording in 9.6 concerning parking permits seems very restrictive and one wonders if it holds in Merton's established AQFA's
- [4] 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. In particular how will Merton enforce, the somewhat 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 residents 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 relatively easy and it would be good to know how Merton is going to do this.
- [5] It has become apparent that the Waste processing sites in Weir Road have lead to very large numbers of waste carrying HGV's on local roads. Indeed, even in lock down, there are about 650 such movements and 80% of these are travelling through

Wimbledon to Weir Road generating air pollution and traffic congestion. It would be much better if Merton Council were to find sites further to the south where the waste could be processed closer to where it is generated. Such an idea should be added to the section Transporting Waste and Construction Materials with points 8.5-7. Such a change would be beneficial to Merton Council as it could build houses in Weir Road, those processing waste would have less distance to travel and the Wandle Valley Regional Park would be considerably enhanced as it would no longer have waste processing with a few meters of it. Such a change would be similar to that carried out at Benedict Wharf.

We also suggest to add in this section some remarks that require Merton Council to monitor in some way the number of HGV movements going to and from its waste sites and the amount of waste being processed.

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