

**Further comments of the Wimbledon Park Residents Association
for the inspectors of the South London Waste Plan 2021-36**

- [1] The South London Waste Plan 2021-36 stressed that it should "minimising air pollutionarising from waste facilities by reducing waste- related HGV movements on the strategic/ local road network". To assess its impacts on air pollution the plan considered how certain air quality focus areas would be affected. Unfortunately these areas are often located quite far from the sites where waste is being processed and so they are not affected by the HGV's carrying waste. They are also often not areas of high air pollution compared with those close to where the waste is being processed and so the effects of an increase in air pollution are less important. Thus the assessment of air pollution used for the 2021-36 plan is irrelevant to the actual air pollution created by the waste processing plants. The situation in Merton is discussed in detail in our previous submission. It is only in recent years that the adverse effects of air pollution have become apparent and given this new understanding it is particularly important to properly assess air pollution. **The plan does not assess the actual air pollution generated by the existing waste processing sites.**
- [2] The waste processing plants were designated in the South London Waste Plan 2012, including those in Weir Road in Merton. The planning permission for these later sites was granted without requiring any assessment of the traffic levels or air pollution that they would generate. Furthermore no restrictions were placed on the number of HGV movements permitted. The total tonnage allowed to be processed was specified but opinions differ as to how much useful information can be deduced from this. Since the sites have been in operation, Merton has not quantified the number of HGV's they generate. Neither have they assessed the air pollution they generate. However, Merton has measured the air pollution on the roads along which these HGV's travel. Illegally high levels of air pollution have been detected, putting the health of local residents at risk. **The sites designated in the 2012 Plan in Merton have generally been allowed to develop in an unconstrained manner and there has been no assessment of the traffic congestion, or the air pollution due to NO2 and particulates that they generate.**
- [3] It is obvious to the local community that there are very substantial numbers of waste-carrying HGVs going to and from the sites in Weir Road. One only has to stand at the side of the main roads leading to these sites to see the very frequent passage of these HGVs. As a result, the Wimbledon Park Residents Association (WPRA) decided to carry out a traffic survey, the results of which are presented in the appendix below. The survey found that even during lockdown there were on average more than 600 waste-carrying HGVs each day going into or out of Weir Road. About 80% of these HGVs came from the south, demonstrating that substantial amounts of waste are being transported unnecessarily through Wimbledon. According to the 21-36 plan waste should, if possible, be processed close to where it is generated so it does not lead to unnecessary long journeys which result in avoidable traffic congestion and air pollution. **As such the waste processing sites in Weir Road are not well**

located and it would have been better to have the waste processed much closer to where it is generated which we believe is near the A3.

[4] Policy 7.14 Improving air quality of the London Plan stresses the importance of tackling air pollution and in particular "Development proposals should: minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas....." Furthermore "the Mayor also encourages local authorities to publish supplementary planning documents to ensure that air quality is fully embedded within the planning process. " The London Plan also requires a traffic assessment if a development is located in an Air Quality Management Area (AQMA), is likely to result in a new air pollution exceedence, is likely to exacerbate an existing air pollution exceedence and involves waste management... . All of these are true for the waste processing plants in Weir Road in Merton and we expect that they apply to certain other sites in the four boroughs. The London Plan also states that planning applications for major developments in London also need to be accompanied by an air quality neutral assessment. **The South West Waste Plan 2021-36 is incompatible with the London Plan as it has not assessed its consequences for air pollution.**

[5] The National Planning Policy Framework paragraph 32 states that "the plan has addressed relevant environmental objectives ... Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued". The South West Waste Plan 2021-36 essentially adopts the designation of waste processing in the 2012 plan and has made no real attempt to assess the air pollution they generate. As such it does not address these relevant environmental objectives.

Furthermore the South West Waste Plan 2021-36 is not sound in terms of the definitions given in paragraph 35 in that it has not "Positively prepared providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs" as it has not achieved its objectives concerning air pollution. Nor is it "Justified an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" as it has not properly assessed the current sites or seriously considered any alternative sites.

Paragraph 181 of the National Planning Policy Framework states that " Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts..... Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. " **The South West Waste Plan 2021-36 is incompatible with the National Policy Framework as it has in effect not assessed the air pollution that it generates, but rather it has just accepted the designation of waste processing sites as given in the 2012 plan instead of evaluating whether there are better alternative sites..**

[6] National Planning Policy for Waste in paragraph 5 states that "Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria....the capacity of existing and potential transport infrastructure to support the sustainable movement of waste,the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality." Also "having regard to the factors in Appendix B such as " air emissions, including dust. Considerations will include the proximity of sensitive receptors, including ecological as well as human receptors." **The South West Waste Plan 2021-36 is incompatible with the National Planning Policy for Waste for the reasons spelt out above.**

[7] Since the councils regularly measure air pollution and record traffic levels on certain roads it would have been feasible to measure the flow of HGV traffic to and from the waste sites and also measured the air pollution in their vicinity. It would also have been possible to ascertain the source of waste materials being delivered to the sites in order to determine how far the HGVs are travelling. Armed with this information it would have been possible to understand the effects of waste processing sites on transport infrastructure and air quality levels in the vicinity of waste processing sites, work and in particular find out which waste processing sites are generating unacceptable levels of vehicle movements, air pollution and know whether waste was being processed as close as possible to where it was being generated and if the waste was being processed as close as possible to where it was being generated. In contrast the current plan generally just accepted the designation of the waste processing sites designated in the 2012 plan.

For some locations the above mentioned data is known. Merton Council has measured the air pollution on some of the local roads along which the HGVs serving the waste processing sites in Weir Road with the results that the area does suffer from high air pollution levels. These roads include Durnsford, Haydons and Gap Road and Plough Lane. As we have mentioned, the WPRA has monitored the flow of waste-carrying HGVs to the sites in Weir Road and has found that there are in excess of 600 waste carrying HGV's going in or out of these sites each week day and that about four-fifth of them going south. As such the vast majority of the waste is being created to the south of Wimbledon and is being unnecessarily being transported through Wimbledon.

It has been assessed that air pollution is killing about 33 people in London every day. The air pollution generated by waste carrying HGV's contributes significantly to this poor air quality and so it is very important that this is properly assessed and taken into account. Our understanding of the serious consequences of high levels of air pollution has increased in recent years and while it was perhaps understandable that this was not seriously taken into account in the 2012 plan this should not be the case for the current plan. It might even be possible to assess the number of deaths due to waste-carrying HGVs. **It would have been feasible to measure the air pollution and traffic congestion generated by the waste processing sites and to have used this data to better understand the consequences of the individual waste processing site designated in the 2012 plan. Even for**

sites where it was known that there were high levels of air pollution on the nearby roads this was not taken into account in the current plan.

- [8] In an ideal world, to protect the health of local populations the South West Waste Plan 2021-36 should measure the traffic congestion and air pollution as well as the journey patterns associated with the existing waste processing sites. Local authorities should also take into account changing demographics and usages of the areas in which waste processing sites are located. For example they should assess if additional residential developments been built in their vicinity. All this data could then be used to determine which waste processing sites are generating unacceptable levels of air pollution and traffic congestions. A search for alternative sites could then be undertaken.

A realistic strategy would be to not safeguard the waste processing sites which are already known to generate high levels of air pollution, traffic congestion in residential and suburban areas and are carrying their waste far from where it is generated. A process to find alternative sites could then be undertaken. Clearly this would take some time and uncertainty but this would be better than unnecessarily exposing residents to high levels of air pollution for many years into the future. The same strategy could be applied for sites which are suspected to lead to these problems, the air pollution and traffic levels could be measured and if it was found to lead to the same problems the same strategy could be applied.

It is known that the waste processing sites in Weir Road, Merton do lead to very large numbers of HGV movements and generate unacceptable air pollution on local roads which are lined by residential housing. The majority of this waste is also being transported unnecessarily through Wimbledon as it is generated to the south. The 2021-36 plan only considered the way these sites affect the air pollution in Wimbledon Broadway which is quite far away and the HGVs do not go to this area. As such this assessment had little to do with the sites in Weir Road. It is also the case that very many residential homes have been built near Weir Road since 2012. Furthermore the land occupied by these waste processing sites is safeguarded for the Crossrail 2 project and so the waste operators may be forced to move in any case.

The vacated sites on Weir Road are owned by Merton Council and could be use to help resolve the pressing need for new residential housing. This would also enhance The Wandle Valley Regional Park and the Wandle trail that it includes which at present passes right next to the waste processing sites.

We note that Merton Council did relocate the waste processing site at Benedict Wharf prematurely as it was before the South West Waste Plan

2021-36 is finalised. At the hearing before the Mayor of London it is reported that Merton council staff cited the proximity of nearby residential development, protected open space and the sheer volume of HGVs servicing the site as making it unsuitable for waste recycling and said that relocation would improve the area in terms of road safety, air quality and noise. A letter of 17 November 2020 from Merton Council to the Mayor of London stated that " For many years, local residents had to endure 40+ lorries every day Moving the waste use will both improve road safety but also air quality...". We recall that there are 600 plus waste-carrying HGV's going into and leaving the Weir Road sites.

**Appendix. Survey of waste carrying HGVs on Weir Road
by the Wimbledon Park Residents Association**

Summary of the results

It is obvious to local residents that there are very substantial number of HGV's using the waste processing sites in Weir. As a result the WPRA decided to carry out a traffic survey. It found that there were an average of 625 waste carrying HGV's each day going in or out of the waste processing sites in Weir Road. This includes the numbers going in and out of both the north and south entrance of Weir Road. These numbers were found during lockdown and are likely to be significantly below the usual numbers. They also do not include HGV's after 5pm and before 7am. The rough number of waste carrying HGV each year generated by the waste processing sites in Weir Road is $700 \times 300 = 210,000$ or about a quarter of a million. It works out at about one a minute during the working day.

An important observation is that only 127 of 625 HGV's went north. This is 20%, or one fifth of the HGV's went North. As a result substantial amounts of waste are being transported unnecessarily through Wimbledon. Waste processing is to be sited near to the waste it is collecting. As such the waste processing sites in Weir Road are not well placed and it would have been better to have the waste processed much closer to where it is generated which we believe is near the A3.

In the rest of this appendix we give a detailed account of the results of the survey. The traffic movements were recorded by video and we offered to share these videos with Merton Council.

1. The South entrance to Weir Road

On Friday the 20 November 2020 the following numbers of waste carrying HGV's were recorded at the South junction of Weir Road and Durnsford Road

Hour	7 – 8	8 – 9	9 – 10	10 – 11	11 – 12	12 – 1	1 – 2	2 – 3	3 – 4	4 – 5
In	16	20	26	26	25	17	19	25	22	25
Out	15	20	25	21	25	22	14	25	24	8
Total	31	40	51	47	50	39	43	50	46	33

The total number of waste carrying HGV's coming in and out of this junction between 7am and 5pm on the 20th November 2020 was **430**. Of these only 10 went north.

On Thursday the 19 November 2020 the following numbers of waste carrying HGV's were recorded at the South junction of Weir Road and Durnsford Road

Hour	7 – 8	8 – 9	9 – 10	10 – 11	11 – 12	12 – 1	1 – 2	2 – 3	3 – 4	4 – 5
In	15	28	47	25	17	19	24	32	30	29
Out	14	21	26	26	20	13	17	25	22	13
Total	29	49	56	51	37	32	41	57	52	42

The total number of waste carrying HGV's coming in and out of this junction between 7am and 5pm on the 19th November 2020 was **446**. Of these only 13 went north. We note that this number is similar to the number of the 20th number.

2. The North entrance to Weir Road

On Monday the 30 November 2020 the following waste carrying HGV's were recorded at the North junction of Weir Road with Durnsford Road.

Hour	7 – 8	8 – 9	9 – 10	10 – 11	11 – 12	12 – 1	1 – 2	2 – 3	3 – 4	4 – 5
In	0	5	1	8	3	4	4	14	11	9
Out	15	8	15	14	16	13	7	19	9	12
Total	15	13	16	22	19	17	11	33	20	21

On the 30 November 2020 the north junction had 187 waste carrying HGV's between 7am and 5pm. of these 115 went north.

Iain C Simpson, Chairman of Wimbledon Park Residents Association,

56 Home Park Road Wimbledon SW19 7HN

Tel: 020 8947 1301 Mob: 07836 361 782 E-mail: iainsimpson@imi-consulting.com

and

Peter West, Member for planning of Wimbledon Park Residents Association

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