

## Comments of the South London Waste Plan 2021-36

### Executive Summary

While the South London Waste Plan 2021-36 emphasises the importance of good air quality it does not contain any serious analysis of the air pollution resulting from waste processing in South London. A study of the air pollution due to the waste processing should have been carried out in the vicinity of where the waste is being processed rather than a hand waving assessment of its effects on the more distant air focus areas, some of which are not even subject to poor air quality. Such an assessment is particularly important for the waste being processed on Weir Road in the Durnsford industrial estate, whose surrounding area has levels of air pollution that are in excess of EU limits. As is clear to local residents these plants generate a substantial number of HGV movements on the local roads and as a result they have significantly increased the air pollution leading to poor health outcomes for local residents. The air pollution and traffic congestion due to these plants has never been assessed and the development and operation of these sites has not been properly controlled. We propose that air pollution and traffic generated by waste disposal should be accurately assessed in the South London Waste Plan 2021-36 and, where this is found to lead to unacceptable levels of air pollution and traffic congestion, restrictions should be placed on the amount of waste being processed on the corresponding sites.

- [1] Air pollution is on average killing 33 people every day in London and one in eight people in Merton will die as a result of it. Waste management involves large numbers of HGV movements which inevitably increase air pollution and so leads to increased mortality rates. As such air quality is one of the most important considerations when arranging for the future provision of waste.
- [2] It is stated in the report "Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment" that *Overall, the most important sustainability benefits of the preferred strategy include:.....minimising air pollution and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste- related HGV movements on the strategic/ local road network.....* In section 7.12 of this report under the heading Issue 10 Air Quality we find that the plan should for example *avoid creating unacceptable risks of high levels of exposure to poor air quality, particularly for sensitive receptors*. There are other statements along the same lines. Thus the report does give air pollution considerations a high priority.
- [3] The obvious approach to air pollution is to consider if a particular waste processing plant results in a significant increase in air pollution in an area that already exceeds the EU air pollution limits. Furthermore, should this be the case then this increase should be quantified so its effects can be properly understood. This way of proceeding is the one universally adopted in planning applications. If a proposed development will lead to a significant increase in air pollution in an area that exceeds the EU limits then the development will not satisfy planning guidelines and should be refused.

- [4] In contrast The South London Waste Plan 2021-36 adopts a quite different approach. It designates certain "focus areas" and if the air pollution in these areas is not significantly affected by a waste processing plant then it is declared to be acceptable. This assessment is to be carried out in a hand waving manner, presumably based on the distance away the plant is from the closest air focus area. To make clear how far this approach differs from that which is normally undertaken let us consider a proposed development in Waterside Way, which is close to Weir Road. If the developer chose not to carry out an air quality assessment in the surrounding roads, that is Plough Lane, Haydons Road and Gap Road, but instead decided to consider the affect of his proposed development on air pollution in Wimbledon Broadway, then his assessment would be inadequate and the application would be rejected.
- [5] The air focus areas adopted in Merton are given in page 62 "Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road, Raynes Park junctions Kingston Road/Bushey Road and Mitcham London Road A216 from Cricket Green to Streatham Road Junction. The air quality monitoring in these areas as measured by Merton is given on page 64 of the report. There are no air quality results for the first focus area, the second does not exceed EU limits and the third only exceed the EU limits slightly. While the whole of Merton has been designated as a Air Quality Management Area the levels of pollution vary considerable across the borough. There are areas in Merton that do experience high levels of air pollution but the air focus areas selected in the South London Waste Plan in Merton are not really subject to significant air pollution. An important criterion in assessing air pollution is to assess the level of air pollution at the nearest receptors ( residents) rather than at street level. However, The Broadway does not have residents living along its route and so the pollution levels at the nearest receptors are very low as the levels of air pollution fall off rapidly as one moves away from the road.
- [6] The majority of construction and demolition waste that is processed in Merton (90 out of 150 tonnes per annum capacity table 3.4 page 17) is in the Durnsford industrial site, more precisely on Weir Road. The three plants involved are
- NJB Recycling, 77 Weir Road, Merton (M12 page 71 of South London Waste Plan, Issues and Preferred Options. )
  - Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton (M14 page 73 of South London Waste Plan, Issues and Preferred Options. )
  - Maguire Skips, 36 Weir Court, Merton (M10 page 69 of South London Waste Plan, Issues and Preferred Options. )
- [7] The HGV vehicles carrying the waste to and from these plants travel down Plough Lane, Haydon's Road and Gap Road. Local residents have noticed an alarming increase in HGV movements associated with the above operations. One just has to stand by the sides of these roads to realise that there are very many HGV's associated with the above plants travelling along these roads. Indeed the number of such HGV's is a very significant fraction of all HGV's travelling on these roads. The air pollution levels on these roads are very high and systematically exceed EU air pollution limits. The NO2 levels, as measured in 2017 (2018) by Merton Council, in Gap Road, Plough Lane and Haydons Road are 47 (45), 46 (45) and 46 (49). The results that are

significantly over the EU limits. These three roads do have residential housing which is very close to the road side and so, unlike Wimbledon Broadway, the air pollution levels at the receptors are very high. While it is understandable that councils are still coming to terms with the relatively recent realisation that air pollution levels in London are causing death on a catastrophic scale, it is vital that this is correctly taken into account in major developments that increase the risk of such deaths.

The three plants on Weir Road (M10, M12 and M14) are assessed on pages 144 and 145. Under AIR POLLUTION(10), HEALTH AND QUALITY OF LIFE (15) and SUSTAINABLE TRANSPORT (9) we have the assessments ” +?” for the first two categories and ”?” for the last for all three plants. As is clear to local residents these sites should score poorly for all of these categories.

- [8] The adopted 2012 South London Waste Plan did not contain much discussion of the air pollution except for policy WP7 (page 48) *WP7: Protecting and Enhancing Amenity Developments for waste facilities will be required to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.....(e) Air emissions arising from the plant and traffic generated;.....(g) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;...*

Examining the planning applications of the three plants in Weir Road mentioned above there does not appear to be any assessment of the air pollution they would cause on the local roads. Of course it is only relatively recently that the catastrophic effects of air pollution have become apparent but the fact remains that the three plants on Weir Road have been allowed to develop without any regard to the effects on air quality they have caused. Furthermore Merton Council did not appear to place any restrictions on the number of HGV movements due to the three plants on Weir Road, as might be expected by the adopted 2012 South London Waste Plan.

- [9] The three plants mentioned above on the Durnsford industrial site are licensed to increase their capacity by about  $20,000 + 27,000 + 3,000 = 50,000$  tonnes per annum for the disposal of construction and demolition waste. As a result the number of associated HGV vehicles on Plough Lane, Haydon’s Road and Gap Road could significantly increase with a corresponding increase in air pollution and traffic congestion. This would have serious consequences of the health of the residents living near these roads. In short these plants have been allowed to develop in an unchecked way that is in contravention of the policies set out in the South London Waste Plan.

- [10] One might have expected that the South London Waste Plan 2021-36 would rectify the problems that have been caused by air pollution and traffic congestion. However the proposed South London Waste Plan 2021-36 contains no serious analysis of the air pollution or traffic levels resulting from waste processing in South West London. These failures undermine the validity of the report as a whole and one can imagine that the South London Waste Plan might be rejected were it subjected to a judicial review on the grounds of air quality.

- [11] To rectify these problems the following steps should be undertaken.

- As would be the case with any planning application a study to determine the increase in the air pollution and traffic congestion on the affected local roads due to the HGV

traffic associated with each of the proposed, or existing, waste processing plants should be undertaken

- Should it turn out, as expected, that the waste processing activities in Weir Road are very significantly contributing to the levels of air pollution that are in excess of EU limits then limits should be placed on the amount of waste that can be processed in these plants. As a consequence these sites should not be safeguarded in their current form.
  - As has been noted by local residents, and also discussed in the South London Waste Plan, the waste coming to Weir road comes from all over London and the south of London. Transporting all this waste far from where it is being produced very significantly increases the air pollution and traffic. Restrictions should be enforced to ensure that largely local waste is processed in Weir road.
- [12] The waste processing plants on Weir Road adjoin the path along the river Wandle which is promoted as an important part of the Wandle Valley Regional Park. Clearly the presence of extensive waste processing with a few metres of the path does not help with this objective. This proximity of the Sites on Weir Road was raised in the adopted 2012 South London Waste Plan but there seems to have been no corrective measures and the sites in Weir Road were allowed with few suitable restrictions.

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