

**Further comments of the Wimbledon Park Residents Association on the  
South London Waste Plan 2021-36 and the NPPF July 2021  
for the attention of the inspectors**

For ease of understanding we quote in bold face the sections from the National Planning Policy Framework published in July 2021 which are most relevant to the South West Waste Plan 2021-36. We will explain why the plan is not consistent with these planning policies.

**104. Transport issues should be considered from the earliest stages of planning and development proposals, so that:...**

**d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; ....**

The South West Waste Plan 2021-36 did not properly assess the air pollution of the traffic movements resulting from its proposal and so it did not quantify, or take account, the leading environmental impact of its proposals.

**105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.  
.....**

The South West Waste Plan 2021-36 almost entirely adopted the designation of the 2012 plan. However, the traffic movements resulting from the waste processing in the 2012 plan, were not evaluated in the 2012 plan or in the 2021-36 plan or at any time in between these dates. As such the 2021-36 did not actively manage patterns of growth in support of its objectives. The sites in Weir Road have about 600 HGV movements every week day and the majority are taking their waste through Wimbledon when it would be better processed near where it is generated.

**31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.**

The South West Waste Plan 2021-36 accepted the designations of the 2012 plan rather than collect current data on air pollution and traffic levels. It was therefore not underpinned by relevant and up-to-date evidence.

**32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements This should demonstrate how the plan has addressed**

relevant economic, social and environmental objectives (including opportunities for net gains). 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 did not properly assess the air pollution it generated and so it did not address its environmental objectives.

**185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:**

The South West Waste Plan 2021-36 did not consider if the waste site locations proposed in the 2012 plan were leading to avoidable air pollution and traffic congestion.

**186. 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 from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. 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 did not accurately assess the air pollution even in locations where the HGV traffic it generated went along roads which exceeded the safe limits on air pollution. This was true even when these roads were in Air Quality Management Areas and their excessive air pollution was documented by the local councils.

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