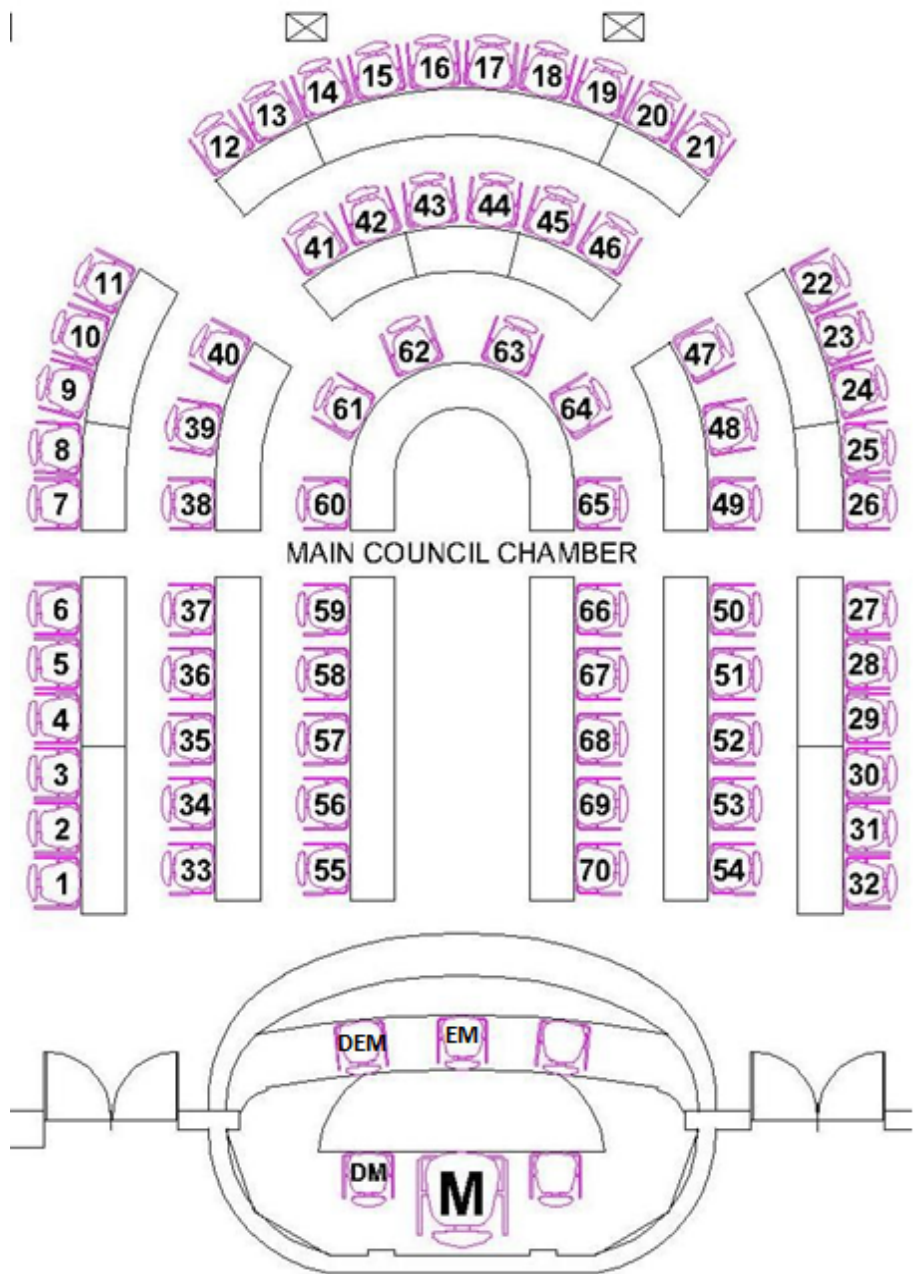




**COUNCIL  
AGENDA**  
for the meeting  
on  
14 December 2022  
at  
6.30 pm

1. Stuart Collins
2. Manju Shahul-Hameed
3. Ellily Ponnuthurai
4. Catherine Wilson
5. Mohammed Islam
6. Appu Srinivasan
7. Clive Fraser
8. Kola Agboola
9. Patricia Hay-Justice
10. Eunice O'Dame
11. Christopher Herman
12. Matthew Griffiths
13. Patsy Cummings
14. Humayan Kabir
15. Sherwan Chowdhury
16. Tamar Nwafor
17. Stella Nabukeera
18. Esther Sutton
19. Ria Patel
20.
21. Claire Bonham
22. Adele Benson
23. Luke Shortland
24. Endri Llabuti
25. Mark Johnson
26. Tony Pearson
27. Helen Redfern
28. Gayle Gander
29. Simon Fox
30. Holly Ramsey
31. Joseph Lee
32. Nikhil Sherine Thampi
33. Enid Mollyneaux
34. Chris Clark
35. Amy Foster
36. Brigitte Graham
37. Mike Bonello
38. Louis Carserides
39. Sean Fitzsimons
40. Leila Ben-Hassel
41. Maddie Henson
42. Karen Jewitt
43.
44.
45. Fatima Zaman
46. Jade Appleton
47. Danielle Denton
48. Ian Parker
49. Simon Brew
50. Margaret Bird
51. Samir Dwesar
52. Lara Fish
53. Alasdair Stewart
54. Robert Ward
55. Chrishni Reshekaron



56. Nina Degrad
57. Janet Campbell
58. Callton Young
59. Stuart King
60. Rowenna Davis (Scrutiny Chair)
61. Richard Chatterjee (Scrutiny Vice-Chair)
62. Michael Neal
63. Andy Stranack
64. Scott Roche
65. Jeet Bains
66. Yvette Hopley
67. Ola Kolade
68. Maria Gatland
69. Jason Cummings
70. Mario Creatura
Notes etc.
<b>M</b> – Civic Mayor, Councillor Alisa Flemming
<b>DM</b> – Deputy Civic Mayor, Councillor Sue Bennett
<b>EM</b> – Executive Mayor, Jason Perry
<b>DEM</b> – Deputy Executive Mayor, Councillor Lynne Hale
Please note that the numbers relate to microphone numbers.



To: To All Members of the Council

Date: 6 December 2022

A meeting of the **COUNCIL** which you are hereby summoned to attend, will be held on **Wednesday, 14 December 2022** at **6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

Stephen Lawrence-Orumwense  
Monitoring Officer  
London Borough of Croydon  
Bernard Weatherill House  
8 Mint Walk, Croydon CR0 1EA

Marianna Ritchie, Democratic Services  
Democratic Services  
Marianna.ritchie@croydon.gov.uk  
[www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)  
6 December 2022

Members of the public are welcome to attend this meeting, or you can view the webcast both live and after the meeting has completed at <http://webcasting.croydon.gov.uk>

If you would like to record the meeting, we ask that you read the guidance on the recording of public meetings [here](#) before attending.

The agenda papers for all Council meetings are available on the Council website [www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)

If you require any assistance, please contact officer as detailed above.

## **AGENDA – PART A**

**1. Apologies for Absence**

To receive any apologies for absence from any Members.

**2. Disclosure of Interests**

Members are invited to declare any disclosable pecuniary interests (DPIs) and interests they may have in relation to any item(s) of business on today's agenda.

**3. Urgent Business (if any)**

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

**4. Announcements**

To receive Announcements, if any, from the Civic Mayor, the Executive Mayor, Head of Paid Service and Returning Officer.

**5. Croydon Question Time**

To receive questions submitted by residents in advance of the meeting.

Seven Public Questions will be heard at this meeting, which will be responded to. The questioners then will have the opportunity to ask a supplementary question based on the answer received.

The questions are as follows:

1. What is the council going to do to help residents in Oval road living with a garden adjoining to the yard at 130 Oval road, which is owned by a developer? A planning application was rejected here on multiple grounds such as access issues and loss of employment in May this year, so will the council consider to strike out this location from the Croydon Local Plan as it's not suitable for development?

2. When will the council finances be in the black so council services will be restored?
3. What is the council planning to do to keep residents safe from violence in the Old Town area?
4. Given that Croydon Council established Brick by Brick to deliver affordable homes under shared ownership on behalf of Croydon Council what procedures are in place to (a) ensure quality of service and (b) allow for feedback from those who have purchased under this scheme?
5. Following a successful bid to the Forestry Commission's Urban Tree Challenge Fund (UTCFF), the GLA is funding the planting of 47 trees in Oval Road during the 2022- 23 planting season (to be planted by 31st March 2023). The UTCFF has also provided funding for establishment costs (watering and maintenance) over three years.

Please confirm that 47 trees will be planted in Oval Road by 31 March 2023.

6. Will the Mayor commit to responding to leaseholders in Messer Court directly about the safety and sale prospects for our homes? I have been fighting for this reassurance since Grenfell and wasted thousands of pounds trying to sell my property that I have been told is unsellable as it is unsafe, mainly due to unsafe cladding. Whilst tenants received updates about developments at Regina Road, leaseholders in my block received nothing. We need clear answers and a clear timeline for action. We also need to know the Mayor's action plan in relation to cladding on council owned properties in Croydon.
7. In the wake of horrific cases of violence such as Sarah Evered, Sabina Nessa and stabbings in our town, safety is a major concern. Croydon Parks needs to be made safe. The gates of parks in my locality are not locked which poses a serious risk to residents and needs urgent action.

When are you going to lock our parks?

The total time allocated to Public Questions is 30 minutes.

**6. Member Petitions**

Two Member Petitions have been received ahead of this Council meeting from Councillor Maddie Henson, Addiscombe East Ward, and from the Fairfield Ward Councillors and Sarah Jones MP. These two petitions are directed to the Mayor and Cabinet Member for Streets and Environment, Councillor Scott Roche.

The petitions have been verified and are worded as follows:

1. We the residents of Craven Road call on the council to introduce 1 way working in Craven Road from the direction of Bingham Road.
2. We, the undersigned businesses of Croydon and / or Surrey Street, Church Street and Old Town hereby petition to the Mayor to reduce anti-social behaviours, drug dealings and knife crimes.

To increase resources including but not limited to: increase Police presence; Public Protection Officers patrolling the area after school hours and evenings; install CCTV cameras at various location to deter crimes.

**7. Recommendations from the Executive or Committees to Council for decision (Pages 11 - 98)**

To consider the recommendations made by the Executive Mayor in Cabinet or Committees since the last ordinary Council meeting relating to the following matters:

1. The Executive Mayor's Business Plan 2022-26
2. Licensing Act 2003 – Review of London Borough of Croydon Statement of Licensing Policy and Cumulative Impact Areas within the London Borough of Croydon Statement of Licensing

## Policy

### **8. Mayor and Cabinet Questions**

For the Mayor and Cabinet to receive questions from members of Council.

### **9. Maiden Speeches**

To hear maiden speeches from up to five Councillors newly elected at the election held on 5 May 2022.

### **10. Response to External Auditor's Query regarding the Former Chief Executive's Settlement Payment (Pages 99 - 110)**

Council is asked to note the Council's response to the External Auditor's query and attached as Appendix 1. Note that the response is based on the Monitoring Officer's findings following due diligence enquiries undertaken.

### **11. South London Waste Plan Development Plan Document - Adoption (Pages 111 - 622)**

As the current South London Waste Plan ends this year, it is important for residents that a replacement plan is in place with up-to-date and robust policies that can be used to consider planning applications for waste facilities.

### **12. Use of Special Urgency for Key Decisions (Pages 623 - 626)**

In accordance with the Access to Information Procedure Rules (Part 4B of the Constitution), the Executive Mayor is required to submit a report to Council on the use of Special Urgency for key decisions.

### **13. Appointments**

For Council to note any new appointments, or changes to existing appointments to committees and / or sub-committees.



#### **14. Council Debate Motions**

To debate any motions submitted in accordance with Council Procedure Rules.

The following two Motions, one from the Administration and one from the Leader of the Opposition, will be debated:

##### **Conservative Administration Motion**

This Council regrets the unacceptable delay in taking remedial action over the issues found at Regina Road and across Croydon's housing stock and welcomes the Mayor's plan to consult on potential regeneration to provide a long-term solution that provides high quality housing for our Council Tenants and Leaseholders.

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##### **Labour Opposititon Motion**

This Council recognises the suffering of so many Croydon residents who are struggling to pay their energy bills in the middle of the cost-of-living crisis.

This Council understands that the average energy bill of £3,000 takes a serious physical and psychological toll, with 60% of people reporting they are too anxious to turn on their heating.

This Council commends Croydon's voluntary sector for leading the way on sourcing 'Warm Banks' - public spaces that people can turn to for heat and companionship when they don't feel able to switch on the heating at home - including Croydon Voluntary Action, The Salvation Army and St George's Church.

This Council notes that over 50% of Local Authorities in England are involved in setting up Warm Banks, according to Save the Children.

This Council recognises that given the difficult financial position of our Local Authority, we must do everything we can to help and that we can do so without adding extra pressure to our finances.

This Council therefore calls upon the Mayor to:

1. Promote Croydon's existing Warm Banks on its website in the Cost-of-

Living Support section as well as regularly through its social media channels.

2. Review the Council's properties, particularly libraries, to see if any could be used as Warm Banks during existing opening hours.
3. Invite other organisations, including businesses, faith and community groups, to open their doors to Croydon's citizens by serving as Warm Banks.

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<b>REPORT TO:</b>	<b>COUNCIL 14 DECEMBER 2022</b>
<b>SUBJECT:</b>	<b>Mayor's Business Plan 2022-2026</b>
<b>LEAD OFFICER:</b>	<b>Katherine Kerswell, Chief Executive Gavin Handford, Director of Policy, Programmes and Performance</b>
<b>CABINET MEMBER:</b>	<b>JASON PERRY, EXECUTIVE MAYOR OF CROYDON</b>
<b>WARDS:</b>	<b>All</b>

**FINANCIAL IMPACT**

As well as facing substantial local historic financial issues, the Council, like the rest of local government, is impacted by the current national and global economic challenges. Over the term of the Mayor's Business Plan, the Council will have to operate within a decreasing financial envelope as it endeavours to achieve financial and operational sustainability. This will require a reduction in council services and in the cost base of all council services, but those that continue will be delivered to a good standard. Any financial cost of the priorities set out in this Plan will be accommodated within the Council's existing budget for 2022/23. Where there are potential ongoing costs in later years, sources of funding for the priorities will be proposed in the future reports on the Budget 2023/24 and the Medium Term Financial Strategy to 2026 and Capital Strategy 2023/26 which are due to be presented to Cabinet and Full Council in early 2023.

**1. RECOMMENDATIONS**

The Executive Mayor, in Cabinet, recommends that full Council:

- 1.1 Adopt the Mayor's Business Plan 2022-26.
- 1.2 Note that a detailed implementation plan and performance framework will be brought to a future meeting of Cabinet.
- 1.3 Note the arrangements to provide assurance of the implementation of the Plan.

**2. EXECUTIVE SUMMARY**

- 2.1 This report presents the Mayor's Business Plan 2022-26 for adoption. This will be the Council's core strategic document setting out its objectives and priorities for the next four years. It reflects the Executive Mayor's manifesto pledges and priorities, as set out in a report to Cabinet in June 2022. It also includes actions to strengthen governance and management systems, achieve financial and

operational sustainability and complete the transformation of the Council. The Plan sets out five outcomes for the Council to achieve, as well as the priority aims and high-level actions required to make them a reality. A detailed delivery plan and performance framework will be developed and presented at a future meeting of the Cabinet.

### **3. BACKGROUND**

- 3.1 Two Reports in the Public Interest, published by the external auditor in October 2020 and January 2022, highlighted grave governance, operational and financial failures within the Council. Two Section 114 notices in November and December 2020 declared the Council's inability to balance its books, compelling it to seek exceptional financial support. The Council developed the Croydon Renewal Plan to support its application to secure financial support of up to £150m from the government in the form of a capitalisation direction. Significant progress has been made to implement the improvements required by the Secretary of State and the other actions contained in the Plan. However, the Council has been left with £1.6bn of debt and other historic financial challenges that are still being examined in depth by the Opening the Books review.
- 3.2 The Executive Mayor of Croydon was elected on a programme of change with a mandate to "restore pride in our borough to once again make it a great place to live, work and stay." A [report to the Executive Mayor in Cabinet in June 2022](#) summarised the commitments he made during the mayoral election campaign in May 2022 and set out the priorities for the Council over the next four years.
- 3.3 The election of the new Administration provides an opportunity to look beyond the scope of the Croydon Renewal Plan and plan for the future. The actions required to give effect to the Executive Mayor's priorities have been identified, as have the outstanding recommendations from reviews of the Council's activity and the measures required to complete the task of strengthening its governance and management systems, achieve financial and operational sustainability and transform the Council. These have been incorporated into a single plan for the Council.

### **4. THE MAYOR'S BUSINESS PLAN**

- 4.1 The Mayor's Business Plan sets out the Executive Mayor's vision for Croydon. This Plan consists of five outcomes to be achieved by the Council over the next four years, with priority aims to deliver those outcomes, along with the high level actions required. The Plan is at Appendix 1.
- 4.2 The financial challenges revealed by the two Section 114 Notices and the two Reports in the Public Interest have reduced the resources available to the Council, which means that it will be forced to do less in future. However, it will strive to improve the responsiveness and where possible the quality of the services it does provide. The Executive Mayor's mission is to transform the Council's way of working – balancing the budget, changing how services are run, securing maximum value for money, instilling strong governance and listening to residents' concerns. The Council will work closely with partners from the



business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower local communities so that together we can transform the Council and deliver services for the borough.

## **Outcomes**

4.3 The five outcomes are:

1. The Council balances its books, listens to residents and delivers good, sustainable services.
2. Croydon is a place of opportunity for business, earning and learning.
3. Children and young people in Croydon have the chance to thrive, learn and fulfil their potential.
4. Croydon is a cleaner, safer and healthier place, a borough we're proud to call home.
5. People can lead healthier and independent lives for longer.

4.4 The first outcome spans the full range of activity across the Council. Achievement of all five of Outcome 1's priority aims is essential in order to transform the Council. It is also a prerequisite for the accomplishment of the other four outcomes in the Plan.

## **Supporting priorities**

4.5 The priority aims that will support the realisation of the five outcomes are as follows:

### ***OUTCOME 1: The Council balances its books, listens to residents and delivers good, sustainable services***

1. Get a grip on the finances and make the Council financially sustainable.
2. Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses.
3. Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors (VCFS).
4. Ensure good governance is embedded and adopt best practice.
5. Develop our workforce to deliver in a manner that respects the diversity of our communities.

### ***OUTCOME 2: Croydon is a place of opportunity for business, earning and learning***

6. Support the regeneration of Croydon's town and district centres, seeking inward investment and grants.
7. Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery.

8. Support the local economy and enable residents to upskill and access job opportunities.

***OUTCOME 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential***

9. Ensure children and young people have opportunities to learn, develop and fulfil their potential.
10. Make Croydon safer for young people.
11. Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm.

***OUTCOME 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home***

12. Make our streets and open spaces cleaner so that Croydon is a place that residents and businesses can feel proud to call home.
13. Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.
14. Invest in council homes to drive up standards and develop a more responsive and effective housing service.
15. Ensure new homes are safe, well-designed and in keeping with the local area.
16. Lead action to reduce carbon emissions in Croydon.

***OUTCOME 5: People can lead healthier and independent lives for longer***

17. Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
18. Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
19. Foster a sense of community and civic life.

**Delivery Plan and Performance Framework**

- 4.6 A detailed Delivery Plan will be developed setting out the Council's actions to deliver the priorities and the outcomes that will be achieved over the Executive Mayor's term. For each action it will include the owners, milestones, resources and outcomes.
- 4.7 A set of key performance indicators (KPIs) will be developed alongside the Delivery Plan to track progress in performing the actions and achieving the outcomes and priority aims. These will be reported regularly to the Corporate Management Team, to the Executive Mayor and Cabinet and to the Scrutiny and Overview Committee and other appropriate regulatory committees of the Council.
- 4.8 The Delivery Plan and Performance Framework will be presented at a future meeting of the Cabinet.

## **Implementation assurance**

- 4.9 The Plan will create a new set of objectives throughout the organisation that will be incorporated into themed strategies, detailed plans for each directorate and service plans. These will inform the personal objectives of every member of staff.
- 4.10 Action is planned to strengthen the organisation's systems for management of programmes and projects, as well as its internal controls and performance monitoring and management. Council staff are receiving training to ensure that they comply with the required procedures and controls. This should produce timely and accurate information that will enable management to intervene when and where necessary.
- 4.11 Themed Internal Control Boards and Directorate Management Teams will oversee the implementation of this Plan. These boards oversee operational issues and provide the Corporate Management Team with assurance that expected outputs are being developed and delivered within agreed timescales and cost and to the right standard.
- 4.12 A mid-term review will check progress in implementation of the Plan in the first two years and consider whether amendments to the Delivery Plan are required. A report on the outcome of the review will be brought to a future meeting of Cabinet.

## **5. CONSULTATION**

- 5.1 Consultation will be conducted as appropriate as the high-level actions contained in the Mayor's Business Plan are developed into delivery and project plans.
- 5.2 The Business Plan is based on a development of the initial 'Executive Mayor of Croydon's Priorities' report which was made to Cabinet in June 2022. The Scrutiny and Overview Committee held a Scrutiny Session on the Executive Mayor's priorities on 27 June 2022 and provided recommendations, to which the Administration responded at Cabinet on 14 September.
- 5.3 As the projects mapped out in the Delivery Plan are progressed, wider engagement will be carried out where required with relevant service users, public bodies, voluntary, community, trade union and other interest groups, such as staff, with an interest in the matter. Resident engagement will inform the development of the youth safety plan, the violence against women and girls plan, and bespoke plans for each hotspot area. Additionally, the Council is planning to undertake a Residents Survey. The results of the survey will inform the development of the projects contained in the Plan to ensure the views of local people are incorporated.

## **6. PRE-DECISION SCRUTINY**

- 6.1 On 27 June 2022 the Scrutiny and Overview Committee considered an update from the Executive Mayor and made [recommendations](#) concerning the plans resulting from the Executive Mayor's priorities. On 21 September, the Executive

Mayor in Cabinet [approved the response to the Committee's recommendations](#), agreeing to the following measures:

1. The Mayor's Business Plan will be supported by the development of a new communications and engagement strategy setting out how the Council will engage with the local community.
  2. New forums will be introduced for residents to be able to contribute to decision making and hold the political leadership to account.
  3. The Council can consider the use of different engagement techniques as part of the Healthy Neighbourhood programme as part of the engagement process, but it is necessary to follow formal statutory processes for Traffic related schemes.
  4. The proposed KPIs will be developed to align with the Mayor's Business Plan. These will be shared with the Scrutiny and Overview Committee for comment.
  5. The role of the Young Mayor will be reviewed in due course.
  6. The Administration will continue to argue for fair funding and engage with Government at all levels to make the case.
  7. The Council will review the carbon neutral action plan and set out how it will lead to reduce carbon emission in the borough.
- 6.2 The draft Delivery Plan will be presented for pre-decision scrutiny, before it is put forward for decision by the Executive Mayor in Cabinet. The Council's performance framework will be aligned with the Delivery Plan.

## **7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 7.1 For 2022/23, any new expenditure will need to be contained within existing budgets. Individual proposals will be presented to Cabinet for approval setting out the source of the funding. This could include funding sources such as the Community Infrastructure Levy.
- 7.2 Where there are potential ongoing costs in later years, sources of funding for the priorities will be proposed in the future reports on the Budget 2023/24 and Medium Term Financial Strategy to 2026 and the Capital Strategy 2023/26, all of which are due to be presented to Cabinet and Full Council in early 2023. Sources of funding may include efficiency savings, re-direction of funding from lower priority services or the Community Infrastructure Levy.

Approved by: Lesley Shields, Head of Finance - Assistant Chief Executive and Resources, on behalf of the Director of Finance

## **8. LEGAL CONSIDERATIONS**

- 8.1 The legal considerations arising from actions contained in the strategic outcomes of the Council and the Delivery Plan will be assessed once the Delivery Plan has been developed and projects come forward for decision making.
- 8.2 The Mayor's Business Plan is the formal Corporate Plan of the Council, and therefore is part of the Policy Framework under Article 4 of the Constitution. The

Full Council is responsible for the adoption of the Policy Framework, and the decision-making process set out in the Budget and Policy Framework Procedure Rules must be followed

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer

## **9. HUMAN RESOURCES IMPACT**

- 9.1 Implementation of the Mayor's Business Plan will require a skilled, diverse, committed, and resident-focussed workforce to enable and ensure effective delivery to Croydon's residents. The delivery of the workforce cultural transformation programme and the Equalities Strategy will be key elements of enabling the workforce to support the delivery of the Executive Mayor's priorities, together with actions from a new people and cultural transformation strategy, which is currently in development.

Approved by: Dean Shoesmith, Chief People Officer

## **10. EQUALITIES IMPACT**

- 10.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, "have due regard to" the need to comply with the three arms or aims of the general equality duty. These are to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act,
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
- foster good relations between people who share a protected characteristic and people who do not share it.

- 10.2 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.

- 10.3 The Council's equalities analysis of the Mayor's Business Plan has identified that its priorities and high-level actions aim to benefit several groups of people that share protected characteristics, with no negative impacts currently identified. They incorporate measures that will advance equality and foster good relations. The Plan includes measures to listen to and involve residents in the design and review of services. As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, at that stage equality analyses will be conducted of the likely effects of each project on the relevant protected groups. Where there is evidence of an adverse impact on any of the protected groups, the Council will consider whether that policy is nevertheless justified in the light



of wider aims. Even if it is justified, the Council will consider whether it should take proportionate steps to mitigate or avoid the adverse impact.

- 10.4 For the Council's services to meet the needs of local residents, and of the community at large, it is essential that its plans and policies take into account the views of local people and others who use council services. The Plan includes arrangements to ensure that residents of all ages are heard and inform service development and commissioning.
- 10.5 Improving data collection from service users across the nine protected characteristics will benefit decision making by ensuring that decisions are based on clear evidence. Directorates will also evidence customer satisfaction and dissatisfaction using this method across the protected characteristics to ensure that the Council is delivering a fair and equitable service to all protected groups.
- 10.6 Consultation and Engagement will ensure fair access for disabled residents by conforming with equality standards such as those outlined by the British Dyslexia Associations and other access measures. Due regard will also be given to ensuring access to those digitally excluded or those who do not speak English as a first language.
- 10.7 The Council will also encourage its community partners, suppliers and local business to adopt both Croydon's Equalities Pledge and the George Floyd Race Matters Pledge, the Council's standard for equality in the borough.

*Approved by:* Gavin Handford, Director of Policy, Programmes and Performance

## **11. ENVIRONMENT AND CLIMATE CHANGE IMPACT**

- 11.1 The Council will lead a borough-wide partnership to secure external funding and focus efforts on driving down carbon emissions in order to implement the recommendations of the Croydon Climate Crisis Commission (which are being given effect through the [Croydon Carbon Neutral Action Plan](#) adopted in February 2022). However, any measure to reduce car use, such as further Low Traffic Neighbourhoods, must only be delivered in conjunction and partnership with local residents and businesses. The Council will not support any proposal to introduce distance-based road pricing or extend the Ultra-Low Emissions Zone to outer London.

## **12. CRIME AND DISORDER REDUCTION IMPACT**

- 12.1 Community safety is a major priority of the Executive Mayor. The Council will propose a review of the structure and membership of the Safer Croydon Partnership, which would oversee four delivery boards focussed on violence against women and girls, youth safety, hot spot areas and counter-terrorism. The Partnership will review the Community Safety Strategy and develop a plan to tackle violence against women and girls. The Council will tackle anti-social behaviour (ASB), crime and violence by working with the Police, developing a strong partnership between the voluntary, business and statutory sectors in

Croydon and using Public Spaces Protection Orders to crack down on ASB hot spot areas.

- 12.2 There will be a strong emphasis on prevention by tackling the underlying causes of crime. This will apply in particular to making Croydon safer for young people, working as one council with partners to develop a youth safety plan, focusing on prevention, intervention, disruption and diversion. Actions will include exploring with young people, the VCS, providers and businesses how to improve access to the youth offer in the borough, working for the provision of mentors for all who are permanently excluded from school to reduce their vulnerability to involvement with gangs and criminal activity. The Council will support schools in their work on early intervention to prevent exclusions and collaborate with them, partners and the community to secure government funding to cut youth crime.

### **13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 13.1 The report presents the four-year Mayor's Business Plan for adoption. This will be a single core plan to implement the commitments of the Executive Mayor of Croydon and outstanding actions to complete the transformation of the organisation into a council that delivers its services in a financially disciplined and motivated way.

### **14. DATA PROTECTION IMPLICATIONS**

#### **14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**NO**

Approved by: Gavin Handford, Director of Policy, Programmes and Performance.

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**CONTACT OFFICER:** John Montes, Senior Strategy Officer.

**APPENDIX:** Mayor's Business Plan 2022-2026

**BACKGROUND PAPERS:** None.

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Page 21

# Mayor's Business Plan

## 2022 - 2026





## Mayor's foreword



In recent years, trust in our Council has been hit as the full extent of the financial mismanagement under the previous Administration has come to light. The two Reports in the Public Interest highlighted deep governance failures and the two Section 114 notices, effectively declaring the Council bankrupt, left it unable to balance its own books and reliant on £150m of government support to stay afloat. The process of 'Opening the Books' has further highlighted inherent weaknesses in income projections and budget setting processes.

At the same time, rather than listening to and serving the people of Croydon, the Council lost sight of its core purpose, preferring to play monopoly with council taxpayers' money, resulting in bailing out its own failing housing company whilst increasing debt to over £1.6bn. Residents deserve and expect better and over the coming years that is what I will deliver.

This Croydon Mayoral Business Plan sets a new direction, building on the hopes and aspirations of our residents and businesses. The Plan will transform the Council into one that delivers sound and sustainable local government services, and in so doing will transform our borough into one that Croydonians can once again be proud to call home.

Change will not happen overnight but, over the next four years, I will put the Council back on track by working through our five priority outcomes and seizing the opportunity to do things differently. I want to improve the quality and responsiveness of the services we continue to provide, whilst being prudent with every penny of taxpayers' money.

I fully recognise that the scale of the financial challenge facing Croydon is almost without precedent in local government. That's why balancing the books, resolving the outstanding financial threats facing the Council, and putting our finances on a stable, secure footing will be the most important task of my Administration in the coming years.

To do that, the Council will need to continue to reduce spending for years to come. That will mean extremely difficult decisions about the services we continue to provide to residents and businesses. Ultimately the Council has to spend less and, in so doing, will be able to do less.

My overarching priority must be to deliver a wholesale transformation of the Council's way of working, so that we balance the budget and change how services are run. The Council will work more closely with our partners from the business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower our diverse communities as we transform the Council and the borough.



At the same time, I will instil strong governance to ensure the mistakes of the past can never happen again and that the Council is once again listening to our residents' concerns. At the heart of this agenda will be a steadfast commitment to seek maximum value for money from every penny the Council spends.

Alongside addressing our financial challenge, I will refocus the Council on residents' core priorities. We will work to make Croydon a place of opportunity for business, earning and learning; to ensure every child and young person in Croydon has the chance to thrive, learn and fulfil their potential; to make Croydon a cleaner, safer and healthier place; and to support our residents to live independently while ensuring the most vulnerable people are safe. Together with our communities and partners, we will restore pride in our borough.

While some of these priorities will require new funding, much can be achieved by getting better value from the money we already spend; making good use of technology; working more closely with our partners like the Police, the NHS and local community organisations; and ensuring the Council listens to and empowers residents to do more for themselves. I will not be able to do everything our community wants, and, in many instances, the Council will have to do less until we have managed to stabilise our finances This isn't just about balancing the books. I am committed to creating a sustainable Council to support residents over the longer term.

Croydon Council has been in crisis for too long. Whilst I do not underestimate the scale of the challenge, I am confident we can and will change the Council for the better. This Business Plan sets out a positive but realistic vision of where we will be in four-years' time. A council which balances its budget, which listens to and works with residents and business, and which focuses its available resources on protecting vulnerable people and delivering core services well.

**Jason Perry, Executive Mayor of Croydon**



# Outcomes and supporting priorities

## 1. The council balances its books, listens to residents and delivers good sustainable services

- Get a grip on the finances and make the Council financially sustainable.
- Become a council which listens to, respects and works in partnership with Croydon’s diverse communities and businesses.
- Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors.
- Ensure good governance is embedded and adopt best practice.
- Develop our workforce to deliver in a manner that respects the diversity of our communities.



By transforming the Council, we will be better placed to achieve these outcomes:



### 2. Croydon is a place of opportunity for business, earning and learning

- Support the regeneration of Croydon’s town and district centres, seeking inward investment and grants.
- Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon’s recovery.
- Support the local economy and enable residents to upskill and access job opportunities.

### 3. Children and young people in Croydon have the chance to thrive, learn and fulfil their potential

- Ensure children and young people have opportunities to learn, develop and fulfil their potential.
- Make Croydon safer for young people.
- Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm.

### 4. Croydon is a cleaner, safer and healthier place, a borough we’re proud to call home

- Make our streets and open spaces cleaner so Croydon is a place that residents and businesses can feel proud to call home.
- Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.
- Invest in council homes to drive up standards and develop a more responsive and effective housing service.
- Ensure new homes are safe, well-designed and in keeping with the local area.
- Lead action to reduce carbon emissions in Croydon.

### 5. People can lead healthier and independent lives for longer

- Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
- Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
- Foster a sense of community and civic life.



# Croydon at a glance

## Population<sup>1</sup>

Largest population in London (390,800), based on 2021 Census

- Most 0-19s in London (97,925)
- Most 20-64s in London (239,761)
- 3rd most over-65s out of 32 London boroughs (53,114)
- Projected growth 2022 - 2041, 7.9%<sup>2</sup>

## Croydon's businesses

Home to **14,990** enterprises - 13th highest out of 32 London boroughs (2022).<sup>3</sup>



**13,885 Micro**  
(0-9 employees)



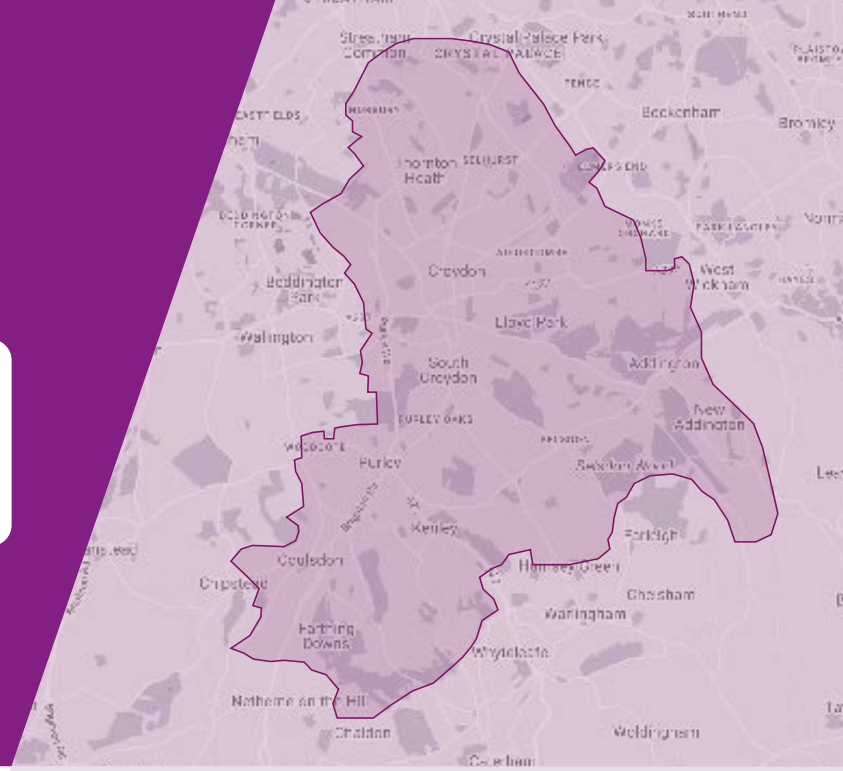
**910 Small**  
(10-49 employees)



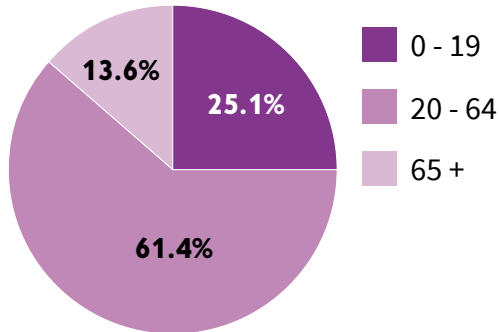
**160 Medium**  
(50 to 249 employees)



**35 Large**  
(over 250 employees)



## Age in years (2021 Census)



Population change by age group in Croydon 2011-2021:

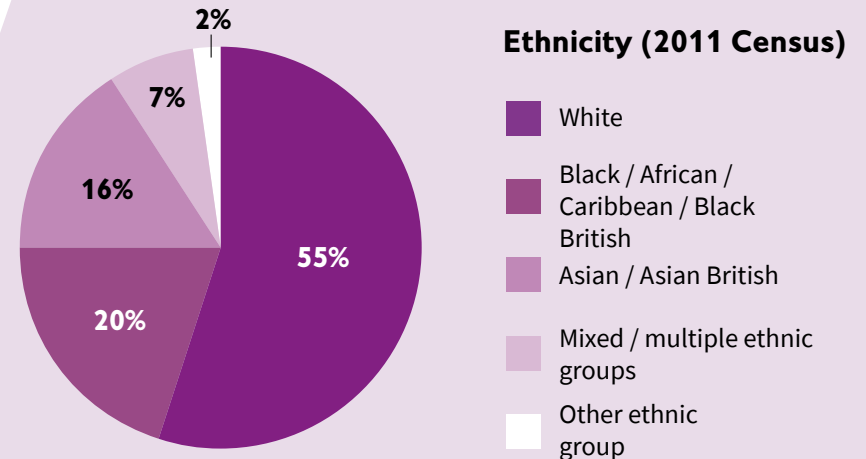
- Children aged 0-15 years increased by 1.5%
- People aged 16-64 years increased by 7.3%
- People aged 65 and over increased by 19.6%

## Croydon's green space<sup>4</sup>



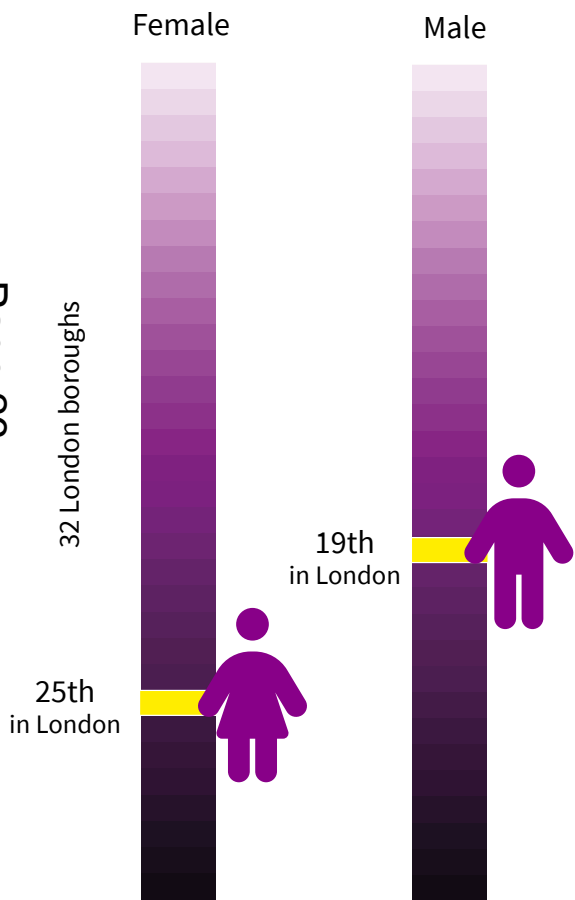
## Diversity<sup>5</sup>

One of London's most diverse boroughs (2011 Census)



# Challenges

## London life expectancy at birth (2018-2020)

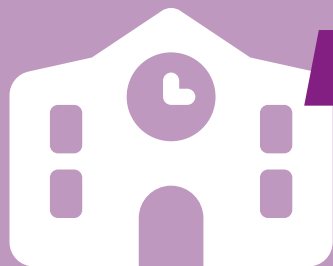


## Gap in life expectancy at birth between most deprived and least deprived ward of the borough (2016-20)



## Health Inequalities <sup>6</sup>

## Education <sup>7</sup>



### Early Years Foundation Stage

74.6% achieved a good level of development. London average 74.1%, national average 71.8% (2018/19)



**Key Stage 2** 60% of pupils reached the expected standard in reading, writing and maths. London average 65%; national average 58% (2021/22)

**Key Stage 2** 8% of pupils reached a higher standard in reading, writing and maths. London average 11%; national average 7% (2021/22)

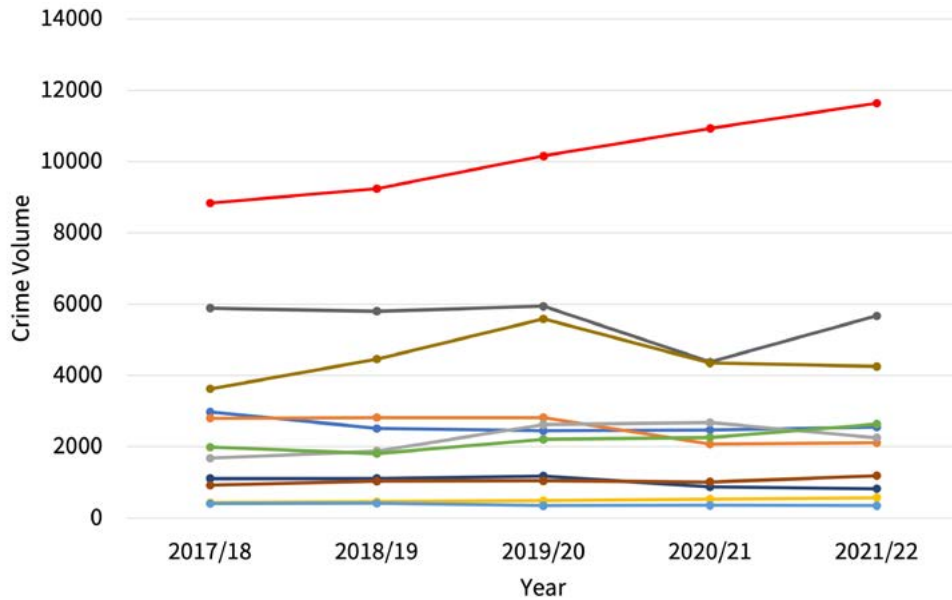


**Key Stage 4** 47.4 average Attainment 8 score per pupil. London average 52.6, national average 48.8 (2021/22)

**Key Stage 4** 48.7% of pupils achieved grades 9-5 in English and maths. London average 57.3%, national average 48.8% (2021/22)



## Volume of crime in Croydon by type in the last five years



- Arson and Criminal Damage
- Drugs
- Possession of Weapons
- Robbery
- Theft
- Violence Against the Person
- Burglary
- Misc. Crime Against Society
- Public Order
- Sexual Offences
- Vehicle Offences



**40,437** offences in Croydon in the rolling 12 months to September 2022, 15th highest rate in London (out of 32). This is 103.6 per 1,000 population.

Crime <sup>8</sup>

## Children's and Adults' Social Care



**2nd Highest**

Rate of **children looked after** within the 32 London authorities (March 2021)<sup>9</sup>

**March 2021**

**683** children of which 211 were unaccompanied asylum seekers

**July 2022**

**538** children of which 95 were unaccompanied asylum seekers



**4th Highest**

A rate of 970 per 100,000 18-64 year olds accessing long term support from **Adult Social Care** "at one point in the year" out of 31 London authorities. (2021/22)<sup>10</sup>

**2021/22**

**2,325** 18-64 year olds

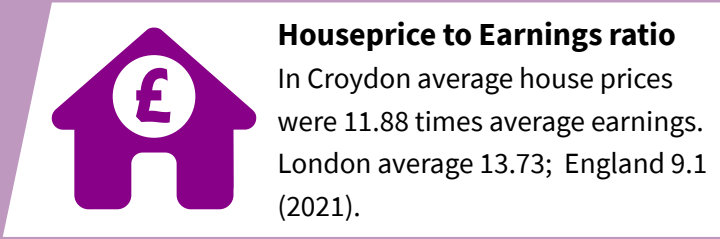
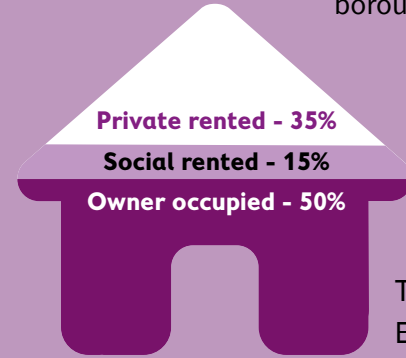
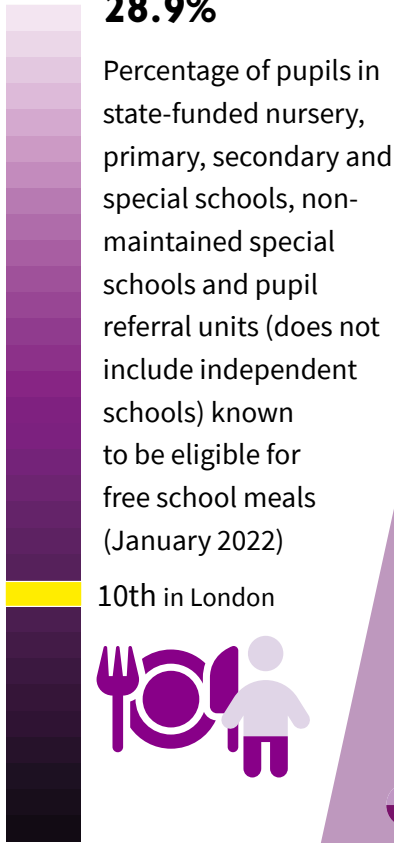
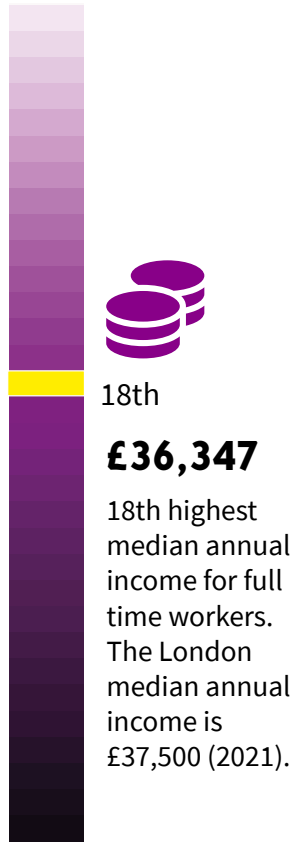


**14th Highest**

A rate of 6,665 per 100,000 65+ year olds accessing long term support from **Adult Social Care** "at one point in the year" out of 31 London authorities. (2021/22)<sup>10</sup>

**2021/22**

**3,600** 65+ year olds



Economy <sup>11</sup>

Housing <sup>12</sup>

# Outcome 1: The Council balances its books, listens to residents and delivers good sustainable services

**Outcome 1 spans the activity of the whole Council and focuses on transforming the organisation into one that delivers sound, sustainable local government services. Owing to the Council's financial situation, we have fewer resources to spend on services for residents. Some services will have to stop; others will be targeted at people with the most need. In some cases, we will work with the community to help themselves and then help residents find the help they need. We must achieve all five of the priority aims below to transform the Council. Unless we do so, we will not be able to accomplish the other four outcomes in this plan.**

## 1. Priority: Get a grip on the finances and make the Council financially sustainable

With the Council still reliant on Government support to stay afloat, getting a grip on the finances is a top priority. This will mean difficult but necessary decisions to make the Council financially sustainable for the future. We will instil financial discipline, make services more efficient and seek to get value for money from every penny of taxpayers' money we spend.

- Review the Housing Revenue Account to plan investment in council housing stock.
- Introduce robust contract management to ensure efficient, value for money services.
- Redesign services to improve efficiency and enhance residents' experience.
- Explore shared delivery of services where this could achieve economies of scale.

To do this we will:

- Deliver the savings in the Medium Term Financial Strategy and increase our income.
- Reduce council debt by selling or letting more council assets and repaying capital loans.
- Strengthen financial management systems, budget setting, controls and monitoring.
- Ensure all staff comply with finance and human resources procedures, controls and regulations.
- Deliver projects within budget, with governance controls on spending.





## 2. Priority: Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses

For too long the Council has been an organisation which 'does to' residents rather than work with them. We will work to increase opportunities for residents to get involved in decisions and improvements that affect their lives and put local voices at the heart of the Council's work. We will ensure that all residents are treated fairly, with respect and dignity.

To do this we will:

- Hold regular Croydon Mayor's Question Time events around the borough.
- Actively listen to and take account of resident feedback.
- Develop new ways for residents and partner organisations to have their say on council decisions.
- Ensure the voices of children, young people and their families are heard and inform service development and commissioning.
- Improve customer service standards with a Croydon Customer Charter.
- Work with council tenants and leaseholders to deliver the Residents Charter.
- Make it easier to contact the Council and install a new, reliable telephone system.
- Improve responses to Mayor/Member enquiries, complaints and information requests.



## 3. Priority: Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors

To become financially sustainable the Council will have to deliver essential services within a smaller budget. It will not be able to meet residents' needs on its own. In some cases, others will have to take the lead in future, with the Council stepping back to adopt a supporting, partnership role. To achieve the outcomes Croydon needs, we must join efforts with all partners from the business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower our communities to help themselves. The voluntary, community and faith sectors (VCFS) have an excellent track record of identifying local issues and reaching out to the most vulnerable in our communities. With its partners in the statutory and business sectors, the Council will build support for community and faith groups that play this vital role.

We will:

- Create closer relationships and joint working between the Council and our partners through revitalised partnerships.
- Work with our partners to support bids and bring new funding to the borough.
- Empower local VCFS organisations to bid for council contracts and opportunities.
- Transfer council-owned buildings to management by VCFS organisations where appropriate.
- Work with the health sector to provide coordinated support and funding for the VCFS.

#### 4. Priority: Ensure good governance is embedded and adopt best practice

The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

To do this we will:

- Complete full implementation of recommendations in both Reports in the Public Interest.
- Introduce internal control boards to ensure good governance and project delivery to time and within budget.
- Ensure capital projects have clear outcomes and agreed budgets that are delivered.
- Train and enable staff and elected Members to perform their governance roles effectively.
- Publish a Forward Plan of the key council decisions to be made.
- Build staff understanding of and confidence in using the Council's whistle blowing policy.



#### 5. Priority: Develop our workforce to deliver in a manner that respects the diversity of our communities

We have not always lived by our values. The Council needs to change how it works, actively put residents first and regain their trust. We need to strengthen leadership and management, develop behaviours aligned with the Council's values, improve staff skills, and create a psychologically safe and inclusive environment for all staff. We will support, develop and value our staff to ensure the Council is accessible and visible to our diverse communities and that it delivers the proactive and respectful services they expect and deserve.

To do this we will deliver a new People and Cultural Transformation Strategy to:

- Strengthen our leadership and management capabilities.
- Build an equal, diverse and inclusive workplace.
- Prioritise the health, wellbeing and resilience of our staff, where staff can thrive and are engaged and motivated to deliver positive outcomes for our diverse communities.
- Build our skills and capabilities and optimise our performance.
- Acquire and retain talent, responding to skills gaps in the context of a more competitive recruitment market.
- Establish a market leading reward package for staff.
- Develop an employer brand to attract employees who share the Council's values.

## Outcome 2: Croydon is a place of opportunity for business, earning and learning

### 1. Priority: Support the regeneration of Croydon's town and district centres, seeking inward investment and grants

The Council will work with businesses and residents to develop a new, sustainable plan to regenerate Croydon town centre that responds to changes in the retail and leisure industry. Together we will develop collaborative strategies, seek inward investment and apply for grants to revive our high streets and district hubs, and unleash Croydon's economic potential.

### 2. Priority: Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery

Being awarded the status of Borough of Culture 2023 brings funding for a programme that will put the spotlight on Croydon's amazing cultural, arts and music offer. The celebration will showcase a diverse range of local artists, cultural organisations and venues and will see Fairfield Halls once again playing a key role in local cultural life.



With our partners we will:

- Develop and deliver a clear shared vision with businesses, developers and residents to steer our town centre and high street recovery.
- Launch an exciting inward investment campaign for Croydon to attract new businesses and jobs in growth sectors.
- Work with and encourage more business associations or Business Improvement Districts (BIDs) to bring businesses together and foster recovery in district centres.
- Reopen Purley Pool and Leisure Centre at the heart of Purley town centre.

We will work with our partners to:

- Deliver the Borough of Culture programme of Flagship Events across the borough that puts Croydon on the map.
- Set up an Ignite Fund to empower local artists and cultural enterprises to get involved.
- Offer an attractive annual programme of cultural and community events.
- Work with partners to re-establish Fairfield Halls as one of the premier cultural venues in South London.
- Attract inward investment in culture, creating a legacy.

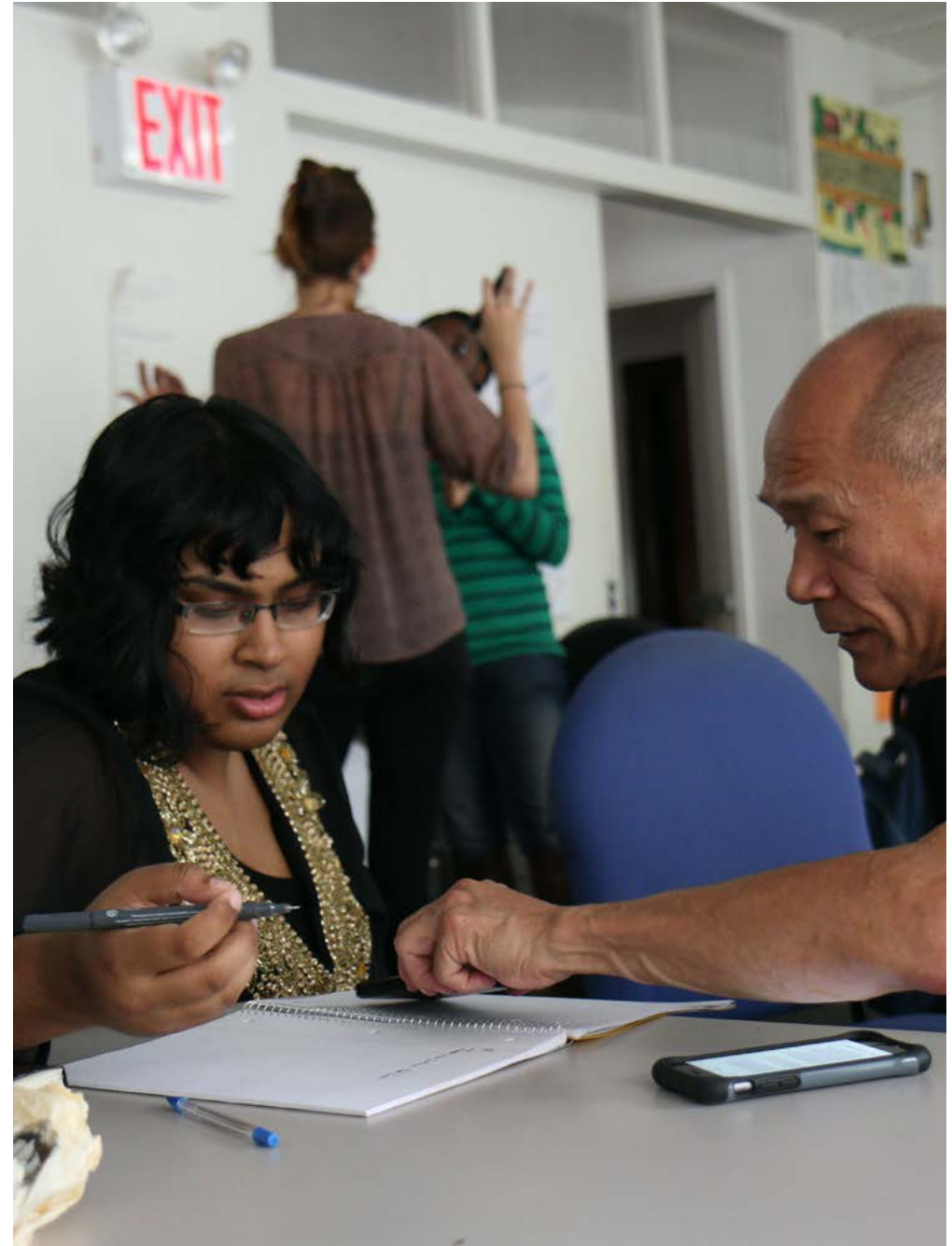


### 3. Priority: Support the local economy and enable residents to upskill and access job opportunities

We will convene partners, developers, investors and Croydon's diverse communities to create economic opportunity for all and enable residents to develop the skills needed to access it.

To do this, we will:

- Use the Council's spending power to buy and employ locally, offer local providers the opportunity to join our supply chains and encourage anchor organisations to do likewise whilst still ensuring value for money.
- Pay the London Living Wage, encouraging our suppliers and other employers to do so.
- Work with training providers and businesses to equip and enable residents to fill jobs in growth sectors and move up career paths.
- Use the social value element of our contracts to ensure that suppliers use local resources such as Croydon Works, Croydon College, London South Bank University and Croydon Commitment.





## Outcome 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential

### 1. Priority: Ensure children and young people have opportunities to learn, develop and fulfil their potential

Croydon is a young borough, with the largest population of under-18s in London. We want to celebrate their talents and achievements and work with partners to enable our children and young people, including those with special educational needs and disabilities, to fulfil their potential.

We will:

- Enable more pupils with special educational needs and disabilities to attend and thrive in Croydon schools.
- Develop an effective Education Partnership with schools.
- Work with schools to improve support for vulnerable pupils and to continue to reduce exclusions.
- Explore with young people, the VCFS, providers and businesses how we can improve access to youth services in Croydon.
- Develop and deliver an Early Years Strategy to ensure every child is given the best start in life.
- Work with all education providers to improve attendance, inclusion and standards for all, so that more of our children and young people can fulfil their potential.
- Celebrate the talents of our young people by supporting initiatives such as 'Croydon has talent'.



## 2. Priority: Make Croydon safer for young people

Making the borough safer for our young people is a top priority. In the year to July 2022, serious youth violence in Croydon rose by almost a quarter compared to the previous 12 months. We will work as one Council to strengthen partnerships with the voluntary, business and statutory sectors and schools in Croydon to tackle the root causes of youth crime, protect those at risk of offending and embed a strong joint approach to prevent youth violence and help our young people to be, and feel, safe.



We will:

- As one council, develop and deliver a youth safety plan with our partners that leads to a reduction in serious youth violence and exploitation and keeps young people safe, seeking government funding to cut youth crime.
- Reduce the severity of the impact of gang activity and exploitation on children and young people in Croydon.
- Work with partners to provide mentors for young people in care or excluded from school.
- Develop and implement the Holiday Activities and Food programme to fund school holiday activities and nutritious food for as many young people eligible for free school meals as possible.

## 3. Priority: Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm

The Council will work with partners including schools to help families earlier when problems arise. We will support families to stay together where it is safe to do so by providing targeted holistic and integrated support. Where statutory services are needed, these will be of good quality and provide value for money. We will fulfil our responsibilities as a corporate parent to ensure children and young people who need to be in our care, and those leaving our care, have the best start in life.

We will:

- Transform and redesign services such as early help and family hubs so families can access the right support in the right place at the right time, reducing the need for statutory support and intervention.
- Review the Croydon Safeguarding Children Partnership to embed the commitment to safeguard children and young people by all partners.
- Implement a programme of continuous improvement to sustain the quality of services relating to children, young people and education.
- Implement inspection recommendations and benchmark services, bringing spending on social care for children down to the average for similar London councils by 2023/24.



## Outcome 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home

### 1. Priority: Make our streets and open spaces cleaner so that Croydon is a place that residents and businesses can feel proud to call home

Residents expect and deserve to feel proud of our borough as they walk down the street. That means working with them and partners to look after our streets, parks and open spaces, and crack down on the graffiti and litter which blight our communities.



We will:

- Review the street cleaning and refuse collection contract.
- Work with partners and Street Champions on a targeted area-based approach to cleaning up our district centres.
- Reintroduce a graffiti removal service.
- Seek funding to improve the public realm of our town centre and district centres, including replacing underpasses with surface level crossings.
- Strengthen our relationship with 'Friends' Groups, giving them a stronger voice and supporting their initiatives.

### 2. Priority: Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer

Ensuring our borough is and feels like a safe place to live is a top priority. We will strengthen partnerships between the voluntary, business and statutory sectors in Croydon to share intelligence and coordinate action. The Safer Croydon Partnership will be restructured, with six delivery boards focussed on violence against women and girls, youth safety, hot spot areas, counter-terrorism, substance misuse and community engagement. We will support the Police to tackle crime and violence in our borough. We recognise what 'Friends' Groups can do to tackle low level anti-social behaviour (ASB) and will work with residents and partners to crack down on ASB hot spots.

We will:

- Strengthen the role that the Safer Croydon Partnership takes to tackle crime and violence, supported by a substance misuse board to deliver on the Government's 10-year programme.
- Review the Community Safety Strategy to focus it on three delivery priorities: violence against women and girls, youth safety and hot spot areas.
- Crack down on ASB hot spots by working with the Police to introduce Public Space Protection Orders (PSPOs) and other appropriate measures.
- Develop and deliver a plan to tackle violence against women and girls by building on our work to tackle domestic abuse, responding to the voices of victims and survivors, and working to stop the perpetrators of violence.



### 3. Priority: Invest in council homes to drive up standards and develop a more responsive and effective housing service

Council tenants and leaseholders expect warm, safe and dry homes, well-maintained by their landlord, but too often the Council has fallen well short of this basic standard. We will transform the housing service to invest in and improve standards in council homes and to put residents at the heart of decisions about the housing service. A renewed focus on tenants will ensure they are treated with respect and their issues and complaints are responded to promptly and effectively.

We will:

- Work with tenants to transform the Housing Directorate into an effective and responsive service as set out in a revised Housing Improvement Plan.
- Introduce a new, effective and responsive housing repairs service.
- Develop an asset management strategy to invest in our council homes, modernise and bring them up to a standard fit for the 21st century.
- Invest in and provide affordable homes.
- Prevent homelessness by providing advice, guidance and appropriate support.
- Review procurement of temporary accommodation for homeless people to obtain value for money.

### 4. Priority: Ensure new homes are safe, well-designed and in keeping with the local area

New development will be design-led, not density-led. While we must continue to plan for new homes, schemes must respect the views of local people, enhance the character of our places, and recognise the need for amenity space.

We will:

- Review Croydon's Local Plan to remove intensification zones, support sustainable development and emphasise design and character over density.
- Revoke the SPD2 Suburban Design Guide.
- Review conservation areas to ensure the borough's special places are protected for generations to come.
- Review the planning and enforcement service to identify the resources needed to improve the service for customers.
- Enforce policies to tackle the cumulative impact of houses in multiple occupation.
- Review the building control service to ensure it can fulfil current statutory duties and new obligations relating to building safety.



## 5. Priority: Lead action to reduce carbon emissions in Croydon

Tackling the Climate Emergency is vital, but it is not something we can do alone. The Council will lead a borough-wide partnership to secure external funding and focus efforts on driving down carbon emissions.

We will work with partners across the borough to:

- Embed climate adaptation and carbon reduction in the strategies of the Council and its key partners.
- Drive a green economic recovery, developing skills and local retrofit capacity.
- Develop a pipeline of retrofit projects and promote public transport and active travel.
- Encourage people, businesses and partners to take action to reduce carbon emissions and tackle the climate emergency.
- Lobby government and the GLA for regulation and funding to scale up action.



## Outcome 5: People can lead healthier and independent lives for longer

### 1. Priority: Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe

We will harness all the skills and experience available to improve health and wellbeing in the borough, enable people to live independently for as long as possible, and keep adults who are at risk of abuse and neglect safe. We will work with partner organisations, including Health, the private sector and voluntary organisations to put residents at the heart of policy making, commissioning and service design.

We will:

- Work with partners through the new Adult Social Care and Health Improvement Board to develop a sustainable model of adult social care for the future.
- Involve residents through a strengths-based approach to practice and commissioning, and co-design our future engagement model with people with lived experience.
- Maximise prevention, early intervention and independence, and manage demand for statutory services, by developing our reablement, direct payments, and care technology offers.
- Commission cost-effective services and continue to work with providers to support and develop the market to meet local need in innovative ways.
- Work with partners and stakeholders to recognise and support carers.
- Support and progress health and care integration where this benefits residents.
- Collaborate with partners to make Croydon a dementia friendly borough.
- Support the development of homes that promote independence.





## 2. Priority: Work closely with health services and the VCFS to improve resident health and reduce health inequalities

Following the pandemic tackling inequality and improving the health of our residents is more important than ever. We will build on our already close partnership with the local NHS to improve public and mental health, reduce inequalities and provide targeted support for those with long-term conditions.

We will:

- Work with individuals, communities and the NHS to promote and increase life expectancy.
- Reduce inequalities in provision for our diverse communities across the borough.
- Advocate and lobby for proportionate NHS funding to reflect the health inequalities within Croydon.
- Target health checks with the aim of reducing the impact of long-term health conditions.
- Work with the NHS to provide an effective vaccination programme for Covid and flu and advocate for immunisation for all communicable diseases where scheduled vaccination provides protection.
- Develop an updated multi-agency harm reduction and suicide prevention strategy.

## 3. Priority: Foster a sense of community and civic life

Croydon's sense of community spirit is one of our greatest strengths. We will increase pride in Croydon and continue to foster a vibrant and active civic life, celebrating the contribution of different communities and creating opportunities for people to come together and share their experiences and histories.

We will:

- Foster good community relations.
- Facilitate community action and celebrate residents' contributions.
- Speak up for Croydon and celebrate the borough's sense of place and its traditions and history.

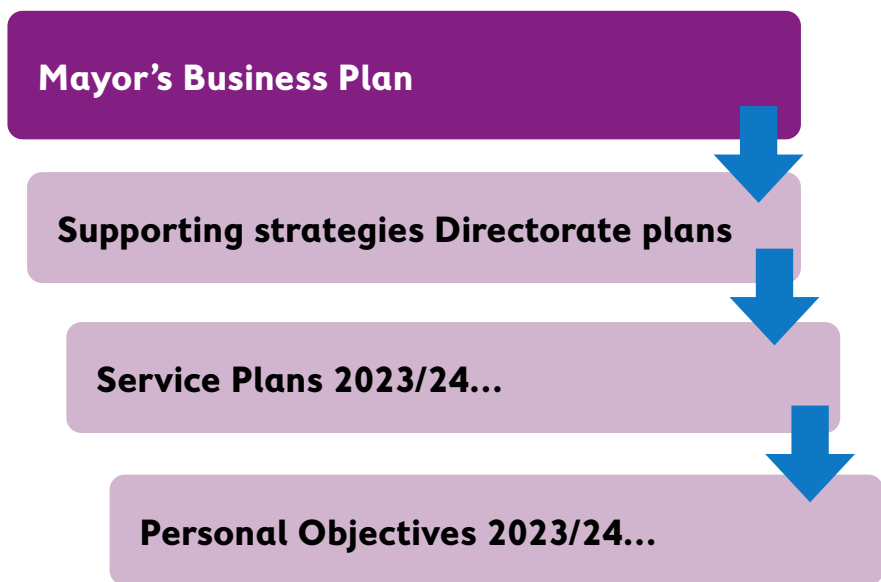


## Ensuring delivery of the plan

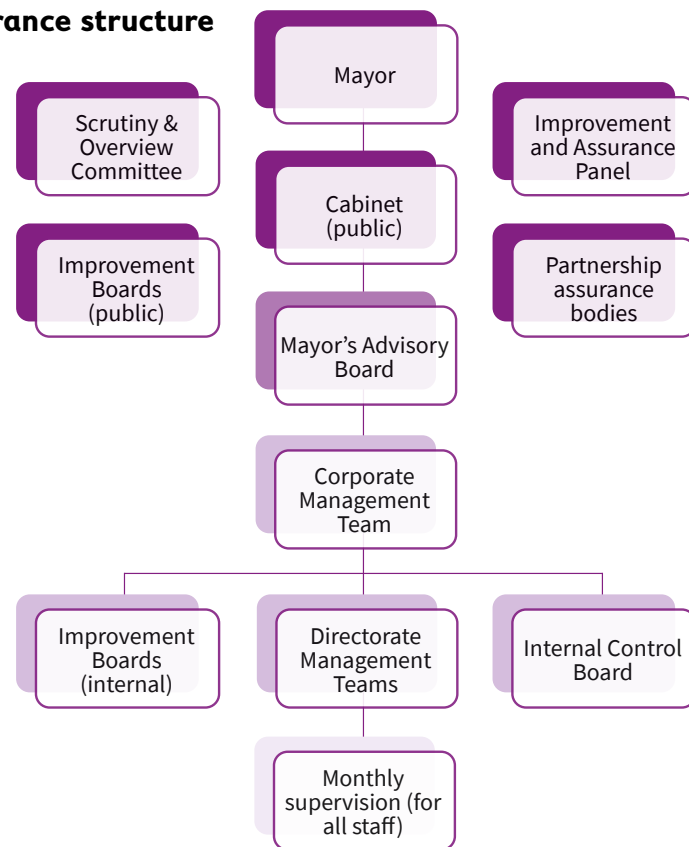
The Mayor's Business Plan will create a new set of objectives throughout the organisation and be developed into themed strategies, detailed plans for each directorate and the service plans. These will inform the personal objectives of every member of staff. The Plan includes action to strengthen the Council's management systems of programmes and projects, as well as internal controls and performance management and monitoring. All council staff are receiving training to ensure that they comply with the required procedures and controls. This should produce timely and accurate information that will enable management to intervene when and where necessary.

We will ensure the implementation of this Plan through themed Internal Control Boards. These take operational decisions and provide the Corporate Management Team (CMT) with assurance that expected outputs are developed and delivered within agreed timescales and cost and to the right standard. A set of key performance indicators (KPIs) will track progress in delivery of the actions in the plan and achieving our outcomes and priority aims. These will be reported regularly to CMT, the Mayor in Cabinet, the Scrutiny Committee and other appropriate regulatory committees of the Council. They will also be viewed by the Government appointed Improvement and Assurance Panel that reports to the Secretary of State for Levelling Up, Housing and Communities.

### Chain of objectives



### Assurance structure



## References

1. Population: Source - Office of National Statistics (ONS), 2021 Census. See [www.croydonobservatory.org](http://www.croydonobservatory.org).
2. Projected growth 2022-41: Source - GLA 2020 based housing led projections.
3. Croydon's businesses: Source - ONS UK business counts 2022.
4. Croydon's green space: Source - Croydon.gov.uk Locally Listed Historic Parks and Gardens.
5. Diversity: Source – ONS, 2011 Census (Census data not available at time of publication. See [www.croydonobservatory.org](http://www.croydonobservatory.org)).
6. Health Inequalities: Source: Office of Health Inequality and Disparities (OHID) Fingertips Public Health data.
7. Education: Source - Department for Education statistics. Early Years Foundation Stage Profile 2021/22 results not available at time of publication.
8. Crime: Source - Metropolitan Police Service Crime Dashboard September 2022.
9. Rate of children looked after: Source - Department for Education Statistics: looked-after children.
10. Adults Social Care: Source - NHS Digital Adult social care activity and finance report 2021-22.
11. Economy: Sources - ONS Annual survey of hours and earnings, 2021; Ministry of Housing, Communities and Local Government 2019, English indices of deprivation 2019 (LSOA - lower super output area); ONS Claimant Count September 2022; Department for Education statistics on school pupils and their characteristics (free school meals); [croydon.simplyconnect.uk](http://croydon.simplyconnect.uk) (foodbanks); ONS Business Register and Employment Survey (employee jobs).
12. Housing: Sources – ONS Census 2021 (households); ONS Local authority housing statistics data returns 2020-21 (council homes); [Metastreet Survey \(2019\)](#) (Census 2021 data on tenure not available at time of publication); ONS Housing affordability in England and Wales (2021).

# 1. Introduction

## 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).



## 2. Proposed change

Directorate	Resources
Title of proposed change	Mayor's Business Plan 2022-2026
Name of Officer carrying out Equality Analysis	John Montes

### 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered. Please also state if it is an amendment to an existing arrangement or a new proposal

The Mayor's Business Plan 2022-2026 will be the Council's core strategic document setting out its objectives and priorities for the next four years. It reflects the Executive Mayor's manifesto pledges and priorities, and the transformation priorities of the Council. The Plan sets out five outcomes for the Council to achieve, as well as the priority aims and high-level actions required to make them a reality. A detailed four-year delivery plan and performance framework will be developed and presented at a future meeting of the Cabinet. The outcomes and priority aims are as follows:

***OUTCOME 1: The Council balances its books, listens to residents and delivers good sustainable services***

1. Get a grip on the finances and make the Council financially sustainable.
2. Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses.
3. Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors (VCFS).
4. Ensure good governance is embedded and adopt best practice.
5. Develop our workforce to deliver in a manner that respects the diversity of our communities.

***OUTCOME 2: Croydon is a place of opportunity for business, earning and learning***

6. Support the regeneration of Croydon's town and district centres, seeking inward investment and grants.
7. Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery.
8. Support the local economy and enable residents to upskill and access job opportunities.

***OUTCOME 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential***

9. Ensure children and young people have opportunities to learn, develop and fulfil their potential.
10. Make Croydon safer for young people.
11. Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm.

***OUTCOME 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home***

12. Make our streets and open spaces cleaner, so that Croydon is a place residents and businesses can feel proud to call home.
13. Tackle anti-social behaviour, knife crime and violence against women and girls, so that Croydon feels safer.
14. Invest in council homes to drive up standards and develop a more responsive and effective housing service.
15. Ensure new homes are safe, well-designed and in keeping with the local area.
16. Lead action to reduce carbon emissions in Croydon.

***OUTCOME 5: People can lead healthier and independent lives for longer***

17. Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
18. Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
19. Build a sense of community and civic life.

### 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

#### 3.1 Additional information needed to determine impact of proposed change

**Table 1 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table.		
Additional information needed	Information source	Date for completion
N/A	N/A	
N/A	N/A	

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

#### 3.2 Deciding whether the potential impact is positive or negative

**Table 2 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<b>For older people:</b> The aim is to make best use of available resources with partners to develop a sustainable model of adult social care. The process will be informed by the co-designing of the Council's engagement model with people with lived experience. The measures in this Plan will promote the independence, health and wellbeing of older people and keep vulnerable older people safe. The Plan aims to maximise prevention, early intervention and independence, adopting a strengths-based approach, developing	<b>For children and young people and older adults:</b> As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<a href="#">Croydon Equality Strategy 2020 to 2024:</a> <ul style="list-style-type: none"> <li>The estimated dementia diagnosis rate for 65+ years has been going up every year in Croydon.</li> <li>2.9% of all 85+ year olds in Croydon cannot speak English well or at all.</li> <li>There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.</li> <li>Since 2015 at local, regional and national levels there has been a lower</li> </ul>

	<p>reablement, direct payments and care technology offers, and supporting the development of homes that promote independence. It also aims to work with partners to support carers and make Croydon dementia friendly.</p> <p><b>For children and young people:</b> The Plan aims to ensure that children and young person can learn, develop and fulfil their potential through work with partners on a youth offer, on mentoring, supporting vulnerable pupils and reducing school exclusions. Partnership work will make Croydon safer for young people and reduce involvement in youth crime, gangs and exploitation. The Plan aims to keep young people safe by transforming and redesigning services so families can access the right support in the right place at the right time, reducing the need for statutory support and intervention. The Council will ensure the voices of children, young people and their families are heard and inform service development and commissioning.</p>		<p>proportion of children from Black backgrounds achieving Attainment 8 scores</p> <ul style="list-style-type: none"> <li>• Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.</li> </ul>
Disability	<ul style="list-style-type: none"> <li>• The aim is to make best use of available resources with partners to develop a sustainable model of adult social care. This will be informed by the co-designing of the Council's engagement model with people with lived experience.</li> <li>• As with older people, measures in the Plan will promote independence, health and wellbeing of people with disabilities and keep vulnerable people safe.</li> <li>• An updated multi-agency Harm reduction and suicide prevention strategy will also aim to keep people with mental health issues safe.</li> <li>• More pupils with special educational needs and disabilities will be able to attend Croydon schools.</li> <li>• Measures to prevent homelessness and to invest in council homes will benefit people with disabilities.</li> </ul>	<p>As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</p>	<p>2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.</p>

Sex	The strategy to tackle violence against women and girls will aim to increase their safety and support victims.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Croydon's population is 51.9% female and 48.1% male (Census 2021)  In the 12 months to July 2022 Metropolitan Police Statistics recorded 5,230 domestic violence offences (13.4 per 1,000 population, the 4th highest rate in London).
Gender Reassignment Identity	Proposed changes are likely to positively impact this group in the same way as other protected groups.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender
Marriage or Civil Partnership			In the 2011 Census, 42.9% of Croydon residents were married, and 0.3% were in a registered same-sex civil partnership.
Religion or belief			56.4% of respondents to the 2011 Census in Croydon stated that they were Christian. 20.0% stated that they had no religion. 7.6% did not state their religion.
Race	<ul style="list-style-type: none"> <li>The Plan commits the Council to listen to, respect and work with Croydon's diverse communities.</li> <li>Measures to ensure that children and young people can learn, develop and fulfil their potential will benefit black pupils, who are more likely to attain below-average scores and to be excluded from school.</li> <li>An annual programme of cultural and community events will help to bring communities together.</li> <li>Work with education and training partners and Croydon's diverse communities aims to create economic opportunity for all and offer all access to skills and jobs.</li> <li>Measures to prevent homelessness will benefit people of BAME backgrounds who are more likely to experience homelessness.</li> </ul>	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<p><a href="#">Croydon Equality Strategy 2020 to 2024:</a></p> <ul style="list-style-type: none"> <li>Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores.</li> <li>Black Caribbean pupils in Croydon (as in England as a whole) have the greatest level of disproportionately when it comes to exclusion from school.</li> </ul> <p>Live homelessness statistics:</p> <ul style="list-style-type: none"> <li>Whereas 64.6% of main homeless applicants owed a prevention or relief duty by the council in 2019/20 declared their ethnic origin to be BAME (<a href="#">GOV.UK</a>) 53% of Croydon population are from BAME backgrounds (GLA,</li> </ul>

			<i>2016-based Round of Demographic Projections Local authority population projections - Housing-led ethnic group projections, November 2017.)</i>
Sexual Orientation	The proposed changes will positively impact this group in the same way as other protected groups.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<a href="#">Croydon Equality Strategy 2020 to 2024:</a> Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual.
Pregnancy or Maternity	Plans to invest in council homes and prevent homelessness will benefit young families who are more likely to be in housing need or homeless.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<a href="#">Croydon Equality Strategy 2020 to 2024:</a> Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children ( <a href="#">Live tables on homelessness</a> )
<p><b>Important note:</b> You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.</p> <p>When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.</p>			



### 3.3 Impact scores

#### Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

#### Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 4 – Impact scores

Column 1 <b>PROTECTED GROUP</b>	Column 2 <b>LIKELIHOOD OF IMPACT SCORE</b>	Column 3 <b>SEVERITY OF IMPACT SCORE</b>	Column 4 <b>EQUALITY IMPACT SCORE</b>
	<p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	2	2	4
Disability	2	2	4
Gender	2	2	4
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	2	2	4
Religion or belief	2	2	4
Sexual Orientation	2	2	4
Pregnancy or Maternity	2	2	4

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Table 5 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups.	Equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Heads of service	TBC
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

## 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision</b>	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b> <i>The priorities and high-level actions of this plan aim to benefit several groups of people that share protected characteristics, with no negative impacts currently identified. They incorporate measures that will advance equality and foster good relations. The Plan includes measures to listen to and involve residents in the design and review of services. As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</i>	X
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 12 October 2022

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## 7. Sign-Off

Officers that must approve this decision		
Equality lead	<b>Name:</b> Gavin Handford	<b>Date:</b> 06.09.2022
Director	<b>Position:</b> Director of Policy, Programmes and Performance	
	<b>Name:</b> Gavin Handford	<b>Date:</b> 06.09.2022
	<b>Position:</b> Director of Policy, Programmes and Performance	



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<b>REPORT TO:</b>	<b>FULL COUNCIL 14 DECEMBER 2022</b>
<b>SUBJECT:</b>	<b>LICENSING ACT 2003 – REVIEW OF LONDON BOROUGH OF CROYDON STATEMENT OF LICENSING POLICY AND CUMULATIVE IMPACT AREAS WITHIN THE LONDON BOROUGH OF CROYDON STATEMENT OF LICENSING POLICY</b>
<b>LEAD OFFICER:</b>	<b>Corporate Director, Sustainable Communities, Regeneration and Economic Recovery Department</b>
<b>CABINET MEMBER:</b>	<b>Cllr. Scott Roche, Cabinet Member for Streets &amp; Environment</b>
<b>WARDS:</b>	<b>ALL</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT: Statutory review of policy document.</b>	
<p><b>FINANCIAL SUMMARY:</b></p> <p>The Licensing Act 2003 became fully operational on 24 November 2005. The local authority has been processing applications with regard to this legislation since 7 February 2005, which was the start of the conversion period under the Act.</p> <p>There are no financial implications associated with this report, save for those set out in the body of the report with regard to decision making by the Licensing Sub-Committee, the substantive licensing committee and full Council.</p> <p>The costs of administering the functions associated with this report will be met from existing resources.</p>	

**For general release**

<p><b>1. RECOMMENDATIONS</b></p> <p>On recommendation from the Licensing Committee, Full Council is recommended to:</p> <p>1.1. Adopt the revised Statement of Licensing Policy 2023-2028 under the Licensing Act 2003 as set out at Appendix 1 to this report and that this revised policy be operative as of 1 February 2023.</p>
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## 2. EXECUTIVE SUMMARY

2.1 The Licensing Act 2003 came into force on 24 November 2005 and made local authorities, as licensing authorities, responsible for the administration of licences and certificates for:

- The sale/supply of alcohol
- The provision of regulated entertainment and
- The provision of late night refreshment

There are four licensing objectives which underpin the legislation and these are:

- The prevention of crime and disorder
- The prevention of public nuisance
- Public safety and
- The protection of children from harm

All decisions under the Act must be taken with a view to promoting these licensing objectives.

2.2 In addition to processing applications, the Act requires each licensing authority to determine and publish a Statement of Licensing Policy setting out how it will exercise its functions under the Act. The first London Borough of Croydon Statement of Licensing Policy was published on 1 December 2004. The Council has to keep its policy under review and revise it as considered necessary. Originally the Council was required to review and revise the policy at least once in each 3 year period after its first introduction. Due to a subsequent legislative change in 2012, this review must now take place every 5 years. The Council may, however, review its policy at any time within that 5 year period should it see fit.

2.3 The Council last reviewed its Statement of Licensing Policy in 2017 and approved and published the revised policy in February 2018 and is therefore required to undertake the statutory review and adopt its updated Statement of Policy at this time.

2.4 The Statutory consultation, as detailed below, has been undertaken and the outcome of that consultation reported to the Licensing Committee along with recommended changes. The draft Policy, as attached at Appendix 1, has been considered by the Licensing Committee at their meeting on 29 November 2022 and having had due regard to the consultation outcomes and the equalities impacts, the Licensing Committee has recommended it for approval by Full Council. The full report to Licensing Committee, as well as the supporting documentation, equalities considerations, consultation outcomes and proposals for the Statement of Licensing Policy can be viewed here: [Agenda for Licensing Committee on Tuesday, 29th November, 2022, 6.30 pm | Croydon Council](#)

## 3. DETAIL

3.1 A report was brought to Licensing Committee on 26 September 2022 requesting authority to commence consultation on the statutory review of the Statement of Licensing Policy, including consultation on a review of existing cumulative impact areas and a proposed new cumulative impact area which, if adopted, would be set

out within the Statement of Licensing Policy. For ease of reference, the report and supporting documentation can be viewed here: <https://democracy.croydon.gov.uk/ieListDocuments.aspx?CIId=135&MIId=3055&Ve r=4>.

- 3.2 As detailed in Section 4, on 4 October 2022, a six week statutory consultation was commenced with the statutory consultees. In addition, all available council communication channels were used to promote the consultation and encourage people to complete the survey giving their views, including via social media and the Council's website and this led to a significant increase in the volume of responses and public participation compared to previous reviews.
- 3.3 At their meeting on 29 November 2022, the Council's Licensing Committee considered responses to the consultation and agreed that the Statement of Licensing Policy at Appendix 1 to this report be recommended for adoption by Full Council. The full report to Licensing Committee, as well as the supporting documentation, consultation outcomes and proposals for the Statement of Licensing Policy can be viewed here: [Agenda for Licensing Committee on Tuesday, 29th November, 2022, 6.30 pm | Croydon Council](#) . In addition, the equalities impact assessment, which has been updated subsequent to the consultation outcome, is attached at Appendix 2.

#### Statement of Licensing Policy:

- 3.4 In reviewing and adopting a Statement of Licensing Policy, Full Council must have regard to the following fundamental principles which are reflected in Appendix 1:
- All statements of policy should begin by stating the four licensing objectives, which the licensing policy should promote. In determining its policy, a licensing authority must have regard to the Statutory Guidance and give appropriate weight to the views of consultees.
  - While statements of policy may set out a general approach to making licensing decisions, they must not ignore or be inconsistent with provisions in the 2003 Act. For example, a statement of policy must not undermine the right of any person to apply under the terms of the 2003 Act for a variety of permissions and to have any such application considered on its individual merits.
  - Similarly, no statement of policy should override the right of any person to make representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the 2003 Act.
  - Statements of policy should make clear that:
    - licensing is about regulating licensable activities on licensed premises, by qualifying clubs and at temporary events within the terms of the 2003 Act; and
    - conditions attached to various authorisations will be focused on matters which are within the control of individual licence holders and others with relevant authorisations, i.e. the premises and its vicinity.
  - A statement of policy should also make clear that licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from the licensed premises and, therefore, beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned. Nonetheless, it is a key aspect of such control and

licensing law will always be part of a holistic approach to the management of the evening and night-time economy in town and city centres.

3.5 Licensing Committee has recommended to Full Council that it approve the below summarised changes be made to the Statement of Licensing Policy and that in light of the outcome of the consultation and having due regard to the equalities impact assessment and the Council's public sector equalities duty, the revised Statement of Licensing Policy at Appendix 1 be adopted.

3.6 A summary of the recommended changes are as follows:

- Retain the four current Cumulative Impact Areas as listed in the existing licensing policy (Cumulative Impact Areas 1-4)
- Introduce a new, fifth Cumulative Impact Area for High Street and Portland Road, South Norwood into the licensing policy (Cumulative Impact Area 5)
- Remove the two 'special stress areas'– High Street & Portland Road, South Norwood and Lower Addiscombe Road
- Update general details in the policy such as borough population, committee and board names and responsibilities. This includes changes to incorporate the new governance structure of the Council with the election of an Executive Mayor and reflects the aspirations for the borough.
- Additional wording included regarding Equalities duties for the Council and operators
- Updates to references to relevant guidance documents

3.7 The Council when acting as Licensing Authority and approving the Statement of Licensing policy must and has had regard to the Licensing Act, secondary regulations, the Home Office Guidance issued to Local Licensing Authorities under s182 of the Act (April 2018 edition) and the outcome of the consultation.

## **4. CONSULTATION**

4.1 Section 5(3) of the Licensing Act 2003 specifies which parties must be consulted with as part of any review of a Statement of Licensing Policy or in respect of cumulative impact area reviews or the introduction of new cumulative impact areas and these are –

- the chief officer of police for the licensing authority's area
- the fire and rescue authority for that area
- each Local Health Board for an area any part of which is in the licensing authority's area
- each local authority in England whose public health functions within the meaning of the National Health Service Act 2006 are exercisable in respect of an area any part of which is in the licensing authority's area
- such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority,
- such persons as the licensing authority considers to be representative of holders of club premises certificates issued by that authority,
- such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority, and



- such other persons as the licensing authority considers to be representative of businesses and residents in its area.

- 4.2 In terms of selecting “such other persons” as are referenced in paragraph 4.1 above, the Council also consulted a wide range of community organisations, relevant trade associations, all Croydon ward councillors and the three borough MP’s. In addition, all available council communication channels were used to promote the consultation and encourage people to complete the survey.
- 4.3 The consultation commenced on 4 October 2022. A copy of the current licensing policy together with information setting out the proposed amendments to the policy was circulated to statutory consultees and a number of interested parties under the definition of “such other persons”. In addition, all available council communication channels were used to promote the consultation and encourage people to complete the survey, including via social media and the Council’s website.
- 4.4 The statutory consultees and interested parties were asked for their comments and views on the proposed amendments to the policy. The Council undertook an online consultation and survey which invited residents and those working in the borough to give their views on the proposals. A copy of all information and documentation included in the consultation can be found at the following link: <https://www.getinvolved.croydon.gov.uk/licensing-policy> . In addition, consultees were also invited to contact the Council’s Licensing Team direct with comments at [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk)
- 4.5 The consultation period was 6 weeks, ending on 15 November 2022. A copy of the consultation documentation can be found as part of the papers presented to Licensing Committee accessible here: [Agenda for Licensing Committee on Tuesday, 29th November, 2022, 6.30 pm | Croydon Council](#) . This includes a copy of the consultation survey questions.
- 4.6 Would Council please note that if the revised Statement of Licensing Policy is approved by Full Council, officers will make arrangements to ensure that the Statement of Licensing Policy is published in accordance with statutory requirements. It is proposed that the revised policy will be operative from no later than 1 February 2023.
- 4.7 The timetable leading up to the Licensing Policy being republished is as follows:

<b>DATE</b>	<b>ACTION</b>
15.11.22	Deadline for consultation responses.
29.11.22	Licensing Committee
14.12.22	Full Council
16.12.22	Publication
01.02.23	Operative Date of new Statement of Licensing Policy

## **5 FINANCIAL CONSIDERATIONS**

### **1 Revenue and Capital consequences of report recommendations**

There are no direct financial implications associated with this report, subject to the risks at 2 & 3 below. This matter is being processed as part of normal duties and therefore the work associated with it is contained within the departmental budget.

### **2 The Effect of the Decision**

Decisions of the Licensing Sub Committee, the substantive licensing committee and full Council may be subject to appeal and/or Judicial Review.

### **3 Risks**

An appeal against a decision of the Licensing Sub-Committee or a Judicial Review of the application and/or policy making processes, including a Judicial review in respect of the Statement of Licensing Policy or adoption or retention of cumulative impact areas may present financial risks to the Council with regard to undertaking litigation and any award of costs against it which might arise as a result.

### **4 Options**

There are no other options available to the Council. The Council is required to review its statement of Licensing Policy in the statutory time frame. In addition, the Council is required to review existing Cumulative Impact Areas to consider whether or not it is of the view that they ought to be retained. The Council has the power to consider the introduction of further cumulative impact areas subject to the necessary evidence.

### **5 Savings/Future Efficiencies**

None identified

(Approved by: Darrell Jones, Acting Head of Finance Sustainable Communities, Regeneration & Economic Recovery)

## **6. COMMENTS OF THE SOLICITOR TO THE COUNCIL**

6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services and Monitoring Officer that the Statement of Licensing Policy provides the framework under which the licensing function is administered and the Council's approach under the Licensing Act 2003.

6.2 The Licensing Act 2003 requires the determination and publication of a Statement of Licensing Policy for each successive five year period. The current policy expires in 2023. The Council must review and publish a revised Licensing Policy before the expiry of the current 5-year period, by virtue of subsection 5(1) of the Licensing Act 2003. It would be unlawful for the Licensing Authority to fail to comply with that mandatory requirement. The Council must keep the policy under review during the five year period and make such changes as are considered necessary.

6.3 In accordance with the Licensing Act 2003 the Statement of Licensing Policy must be determined by Full Council after consultation has been undertaken

with prescribed bodies. These prescribed bodies are detailed in section 4 above as is the consultation exercise undertaken.

- 6.4 The Licensing Authority must have regard to the statutory guidance issued under section 182 of the Licensing Act 2003 when drafting its policy and in undertaking any reviews of existing cumulative impact areas or seeking to remove or introduce new cumulative impact areas. The latest version of the Statutory Guidance was issued by the Home Office in April 2018.

Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of Stephen Lawrence-Orumwense, Director of Legal Services and Monitoring Officer

## **7. HUMAN RESOURCES IMPACT**

- 7.1 The workload associated with the review of the Licensing Policy will be undertaken within existing resources.

## **8 EQUALITIES IMPACT**

- 8.1 The council has an obligation under the Public Sector equality duty, which is a duty to have due regard, in the exercise of its functions to the need to eliminate unlawful discrimination, to advance equality of opportunity and to build better relationships between groups with protected characteristics.
- 8.2 An equality impact assessment was completed during the policy drafting, and has been reviewed regularly as the policy has developed, including following public consultation. This has shown significant support for the proposals, with no negative equality implications raised.
- 8.3 As set out in the EQIA, it is expected that this policy will have a number of positive impacts on groups with protected characteristics.

Approved by: Gavin Handford (Director of Policy, Programmes and Performance)

## **9 ENVIRONMENTAL IMPACT**

- 9.1 The provisions of the Licensing Act 2003 include consideration of the environmental impact of licensed premises.

## **10 CRIME AND DISORDER REDUCTION IMPACT**

- 10.1 Three of the four licensing objectives in the Act relate to the prevention of crime and disorder and public nuisance and the protection of children from harm. The licensing policy is a document that the Council, as licensing authority, should have regard to when deciding licence/certificate applications.

## **11 DATA PROTECTION IMPLICATIONS**

### **11.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

Whilst personal data may be processed as part of the consultation, the information will not be shared any further. A DPIA is mandatory where data processing “is likely to result in a high risk to the rights and freedoms of natural persons”. In this instance the information that may be processed has been categorised as low risk and therefore a DPIA is not required.

(Approved by: Steve Iles, Director of Sustainable Communities)

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**CONTACT OFFICER:** Michael Goddard, Head of Environmental Health, Trading Standards and Licensing

Tel. Ext. 28259

**APPENDICES:**

Appendix 1: Revised Statement of Licensing Policy

Appendix 2: Updated Equalities Impact Assessment

**SUPPORTING DOCUMENTATION:**

[Agenda for Licensing Committee on Tuesday, 29th November, 2022, 6.30 pm | Croydon Council](#)

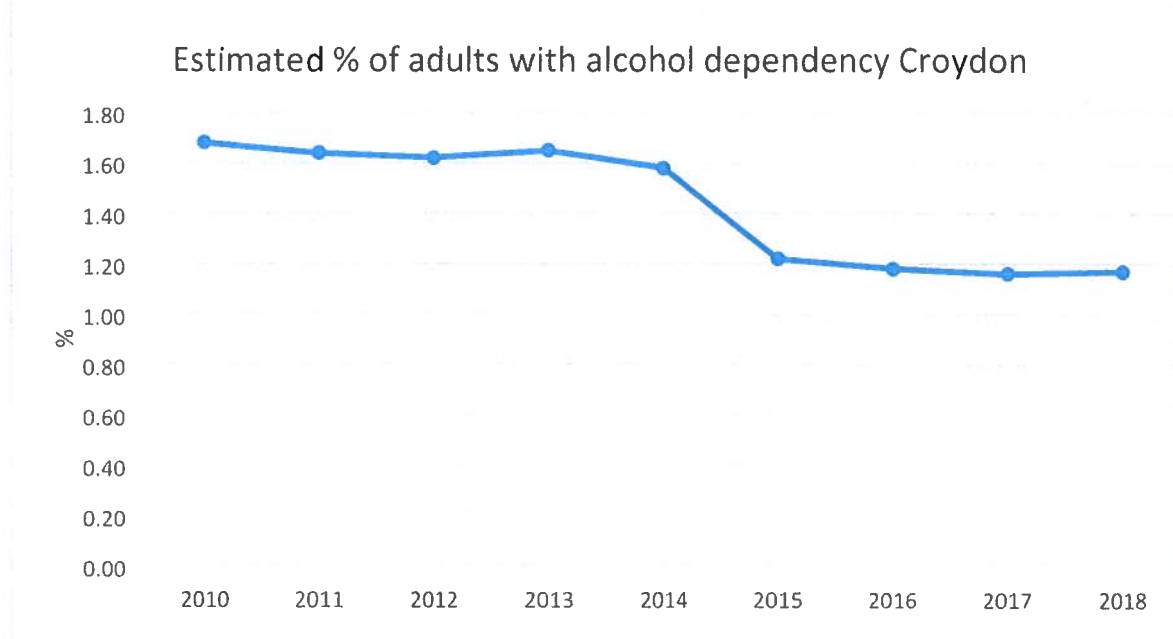
**BACKGROUND DOCUMENTS:** None

## Evidence and Data

### Alcohol use

Between 2,718 and 4,485 adults in Croydon were estimated to be alcohol-dependent in 2018-19, between 0.9% and 1.5% of the adult population<sup>1</sup>

When looking at trend data, the estimated percentage of adults with alcohol dependency appears to have decreased in recent years.



21% of adults in Croydon abstain from alcohol. 8.6% binge drink on their heaviest drinking day and 15.8% drink more than 14 units of alcohol a week as estimated by the Health Survey for England (2015-18).<sup>2</sup>

Between 2.4%-4.6% of 15-year-olds in Croydon were regular drinkers, as estimated by The What About Youth survey in 2015.<sup>3</sup>

### Off licenses

As at June 2022, there are 473 premises in Croydon licensed to sell alcohol to drink off the premises (off-licenses). This is equal to a rate of 1.95 off-license premises for every 1,000 people estimated to be living in Croydon and 2.6 per 1,000 of the adult 18+ population.<sup>4</sup>

<sup>1</sup> Public Health England. 2018-19 Estimates of alcohol dependent adults, based on 2014 Adult Psychiatric Morbidity Survey. <https://www.gov.uk/government/publications/alcohol-dependence-prevalence-in-england>

<sup>2</sup> OHID, Local Alcohol Profiles for England. <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

<sup>3</sup> OHID, Child and Maternal Health. <https://fingertips.phe.org.uk/profile/child-health-profiles>

<sup>4</sup> ONS. 2020 mid-year population estimates. Off-licence numbers taken from local council licensing team.

In 2014, a total of 1,398,180 litres of alcohol were through the off trade, this is equivalent to 4.9 litres per adult (aged 18+).<sup>2</sup>

PHE analysis of alcohol sales data (sales in the on and off trade) has shown a positive association at local authority level between off-trade sales and alcohol-specific hospital admissions. No association was found for on-trade sales.

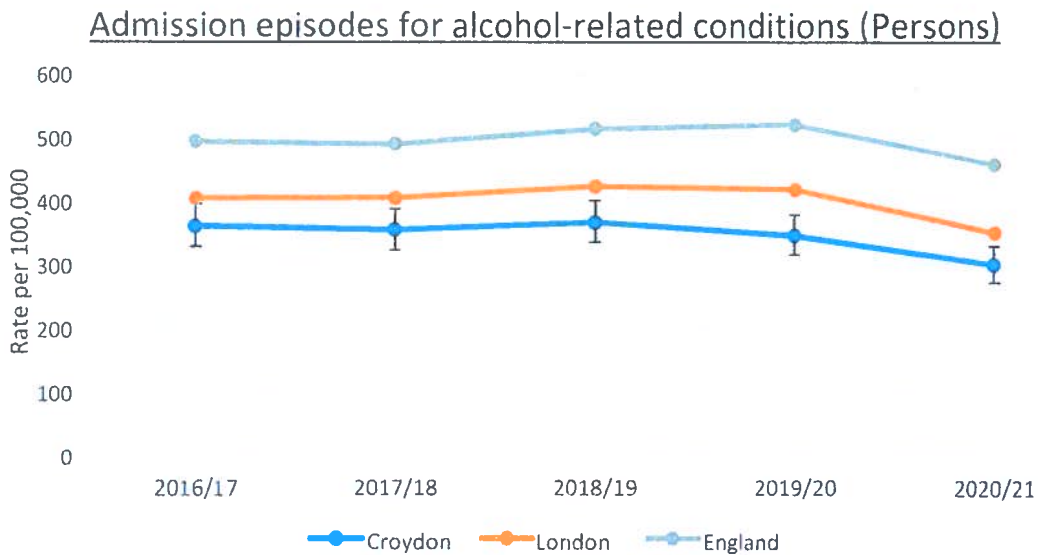
### Alcohol-related Road traffic accidents<sup>2</sup>

26 road traffic accidents in Croydon in 2014-16 were alcohol related. This is a rate of 9.4 per 1,000 road accidents. This is a similar rate to London (10.7) and lower rate than England (26.4).

### Hospital admissions<sup>2</sup>

In 2020/21 there were 1,051 admissions to hospital for alcohol-related conditions (narrow definition). This is a rate of 298 per 100,000 population, lower than the rates seen across England (456) and London (348). 22% of these admissions were in people under 40 years of age, 53% in people aged 40-64 years and 25% in people aged 65 or above. In all age groups the rate of hospital admissions for alcohol related conditions is higher in males than females.

When looking at trend data admissions for alcohol related conditions in Croydon have been significantly decreasing and getting better in recent years.

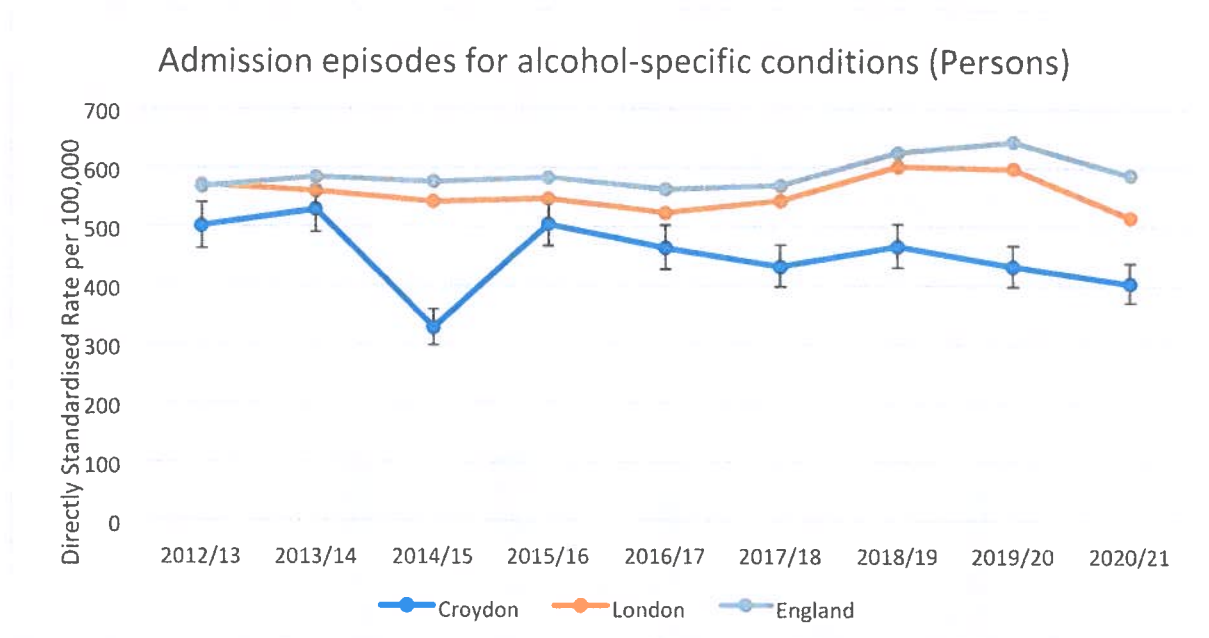


<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2019estimates>



A further 1,440 admissions occurred in the same year for alcohol-specific conditions. This is a rate of 403 per 100,000 population, again lower than the rates seen across England (587) and London (515).

When looking at trend data, admissions for alcohol-specific conditions in Croydon have been significantly decreasing and getting better in recent years.



## Mortality<sup>2</sup>

Latest data (2020) shows that Croydon had an alcohol-specific mortality rate of 10.6 and an alcohol-related mortality rate of 31.3. Rates are directly standardised per 100,000 population. Croydon alcohol-specific mortality rates were similar to both England (13.0) and London (9.9). Alcohol-related mortality rates in Croydon were similar to both England (37.8) and London (32.2). Alcohol-related mortality rates in Croydon were higher in males (46.9) than females (17.9) which were also similar to England and London.

When looking at trend data for alcohol specific mortality and alcohol related mortality in Croydon there is no significant change over the recent years.

## Crime

Data<sup>5</sup> shows that there is a strong relationship between alcohol and a range of crimes including violence. Alcohol-related crime is measured by the Metropolitan Police Service as notifiable crimes which have at least one of the following flags:

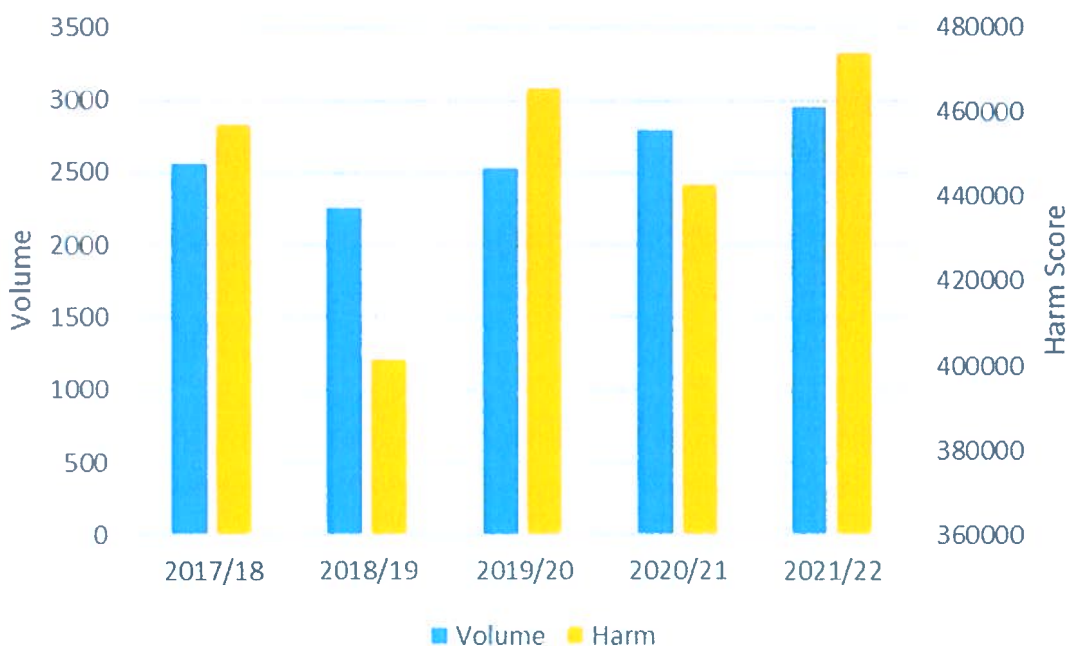
- Alcohol consumed at scene by suspect/accused.
- Suspect/accused had been drinking prior to committing offence.
- Victim had been drinking prior to the offence.

<sup>5</sup> Crime Survey for England and Wales, nature of crime tables (violence)

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/natureofcrimetablesviolence>

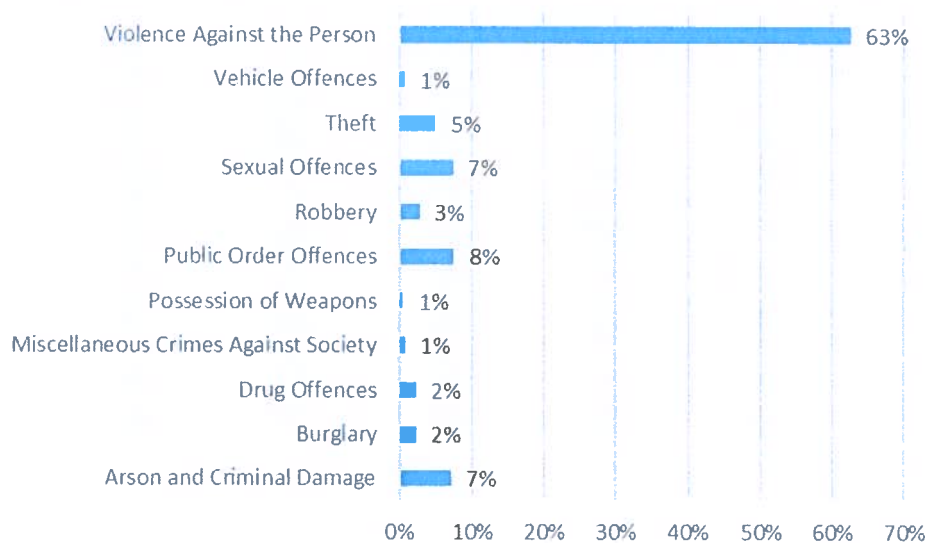
Also, there are specific alcohol-related crimes which are also included in the data (e.g., causing death by careless driving under influence of drink or drugs) and they are the only ones which are notifiable to the Home Office. As there is an issue of reliability of the above flags being recorded consistently, 'wildcards' are also used to identify crimes where alcohol featured e.g., searching for words including 'drunk', 'drinking alcohol' etc in the crime report. However, it must be emphasised that the following statistics on alcohol-related crime in the borough should be treated as the minimal number of crimes where alcohol featured.

The following graph shows the volume and harm<sup>6</sup> of alcohol-related crime in the borough in the last five years. As shown there has been an overall increase in volume over the last five years and 2021/22 was the highest for alcohol-related crime. In regards to harm, even though this has fluctuated over the same period, 2021/22 was also the highest in five years.

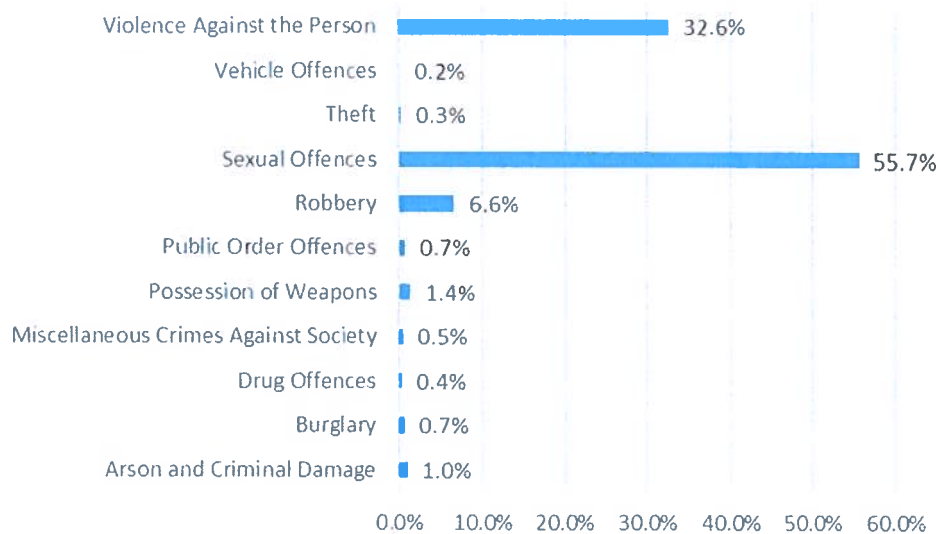


The following chart shows that over 60% of alcohol-related crime volume committed in the borough in 2021/22 was violence against the person. This is followed by 8% being public order offences.

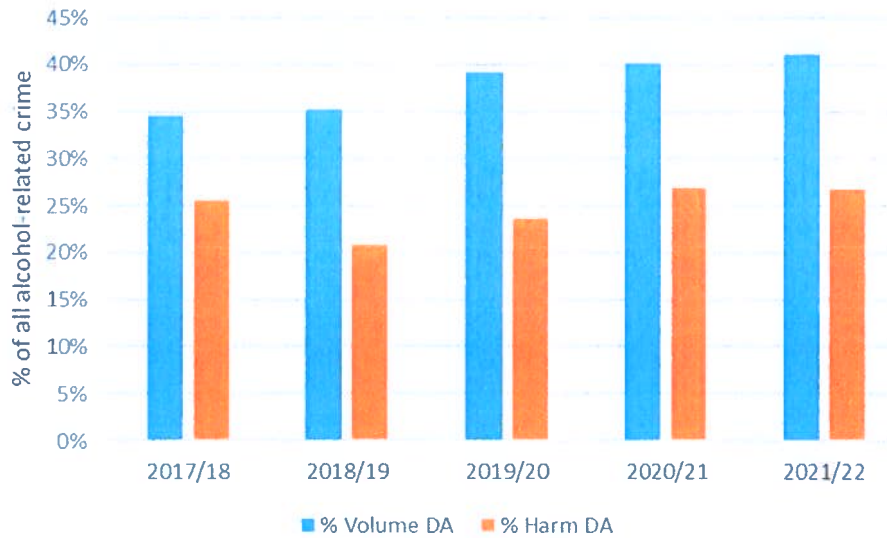
<sup>6</sup> Crime Harm is measured using the Cambridge Crime Harm Index <https://www.crim.cam.ac.uk/research/thecambridgecrimeharmindex>



By looking at alcohol-related crime harm in the borough in 2021/22, over half of all harm committed were sexual offences and around a third was violence.



Alcohol-related crime is closely linked to domestic violence which has also seen higher levels of reported offences in Croydon. The following chart shows that the proportion of all alcohol-related crime volume which is flagged as domestic has been increasing year-on-year with over 40% of all crimes being domestic in 2021/22. In contrast, the proportion of all alcohol-related crime harm which was flagged as domestic as relatively stable over the last five years with it representing 27% in 2021/22.



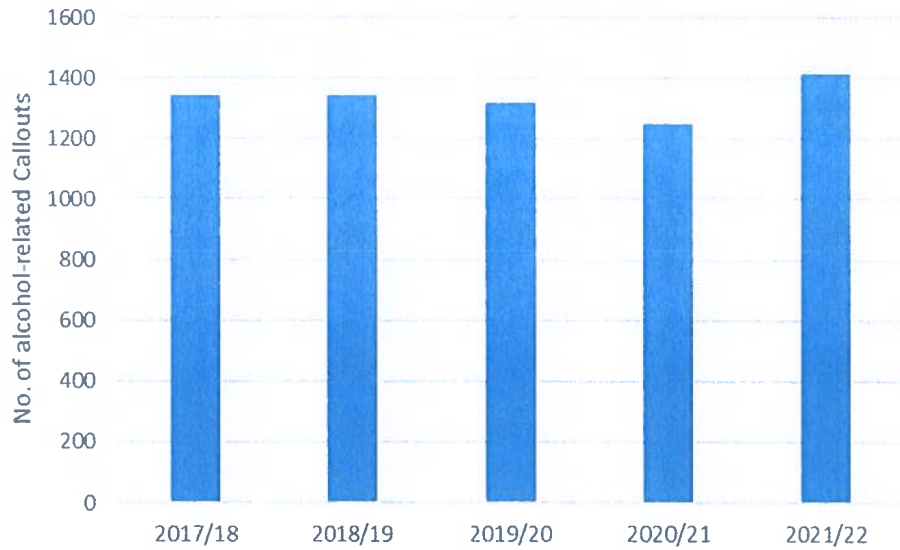
In 2020/21, the Metropolitan Police Service recorded 34,068 crimes within Croydon, of which 11,645 were violence against the person (34.2% of all recorded crimes)<sup>7</sup>. The CSEW shows that, in 2017/18, 42% of the victims of violent incidents believed the offender(s) to be under the influence of alcohol. In Croydon this would result in a total of 4,891 offences of violence against the person were alcoholrelated.

### London Ambulance Service – Alcohol-related Callouts<sup>8</sup>

In 2021/22 there were 1,415 alcohol-related callouts to the London Ambulance Service – the highest in the last five years. Also, 2021/22 saw the only year-on-year increase over the same period with callouts rising to 13%. This large increase can be partly attributed to Covid-19 and the consequential government restrictions where many businesses were closed for substantial periods of time. Therefore, by comparing 2021/22 to 2019/20, there was still an 8% increase in callouts.

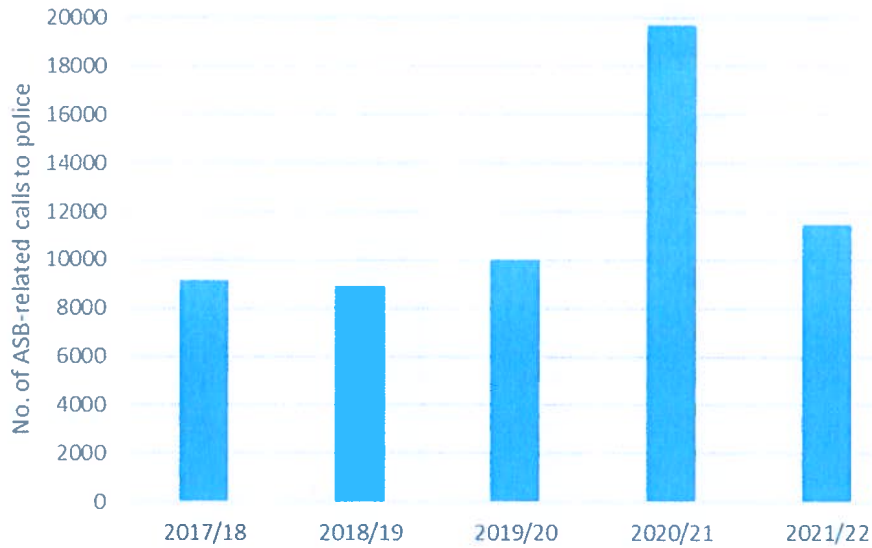
<sup>7</sup> Crime Statistics in Croydon in 2021/22 published by the Metropolitan Police Service [https://public.tableau.com/shared/RMW9PB8ZH?:display\\_count=y&:origin=viz\\_share\\_link&:embed=y](https://public.tableau.com/shared/RMW9PB8ZH?:display_count=y&:origin=viz_share_link&:embed=y)

<sup>8</sup> London Ambulance Service incidents and Dispatches figures from Greater London Authority SafeStats tool, <https://www.london.gov.uk/what-we-do/research-and-analysis/safestats?source=vanityurl>. The same tool used to identify antisocial behaviour incidents from London Ambulance Service, British Transport Police, London Fire Brigade, Metropolitan Police Service and Transport for London. SafeStats contains non-official data for the purposes of operational and strategic insight and is accurate only at the point in time that it is received by SafeStats therefore there are caveats regarding the accuracy of this data.



### **Anti-social Behaviour<sup>8</sup>**

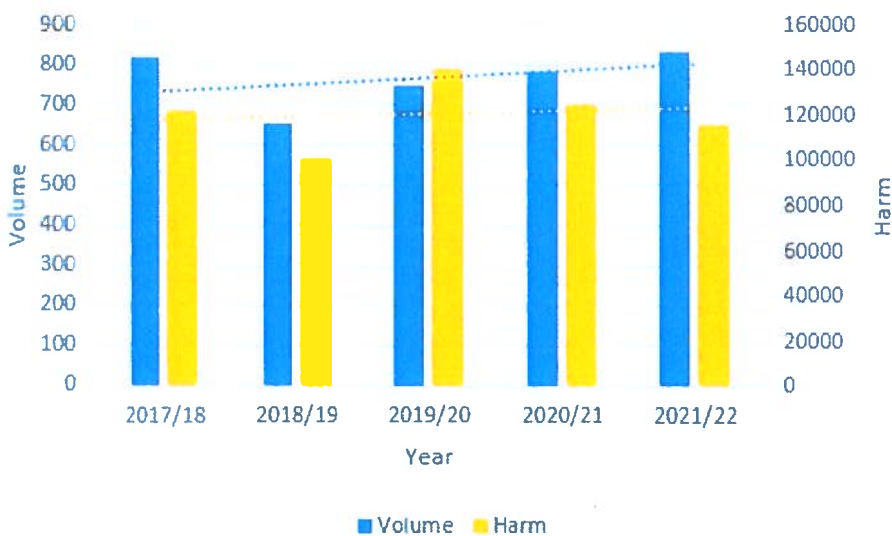
Another reliable indicator of identifying the level of alcohol-related nuisance or disorder is by looking at anti-social behaviour in the borough. In 2021/22 there were 10,087 calls of anti-social behaviour (ASB) made to the police in Croydon. This is a 42% decrease compared to the year before. However, it must be noted that incidents linked to Covid-19 restrictions are recorded as ASB (e.g. lack of social distancing, no mask wearing etc.) therefore this was the main contributor for the large number of calls in 2020/21 as shown in the following chart.



Even though Covid-19 related calls partly contribute to the number of calls in 2021/22, there were much less restrictions in place compared to the year before. Therefore, a fairer comparison is comparing 2021/22 to 2019/20, where there was a 15% increase in incidents.

The current CIA's together have seen the highest volume of alcohol-related offences in 2021/22 in the last five years. This is measured by identifying the number of offences in a 150m area of the CIA's. The volume of offences has risen for the third consecutive year. By comparing 2021/22 to the year before there has been a 6% increase in the number of offences. By comparing 2021/22 to 2019/20 (pre-covid year) there has been an 11% increase.

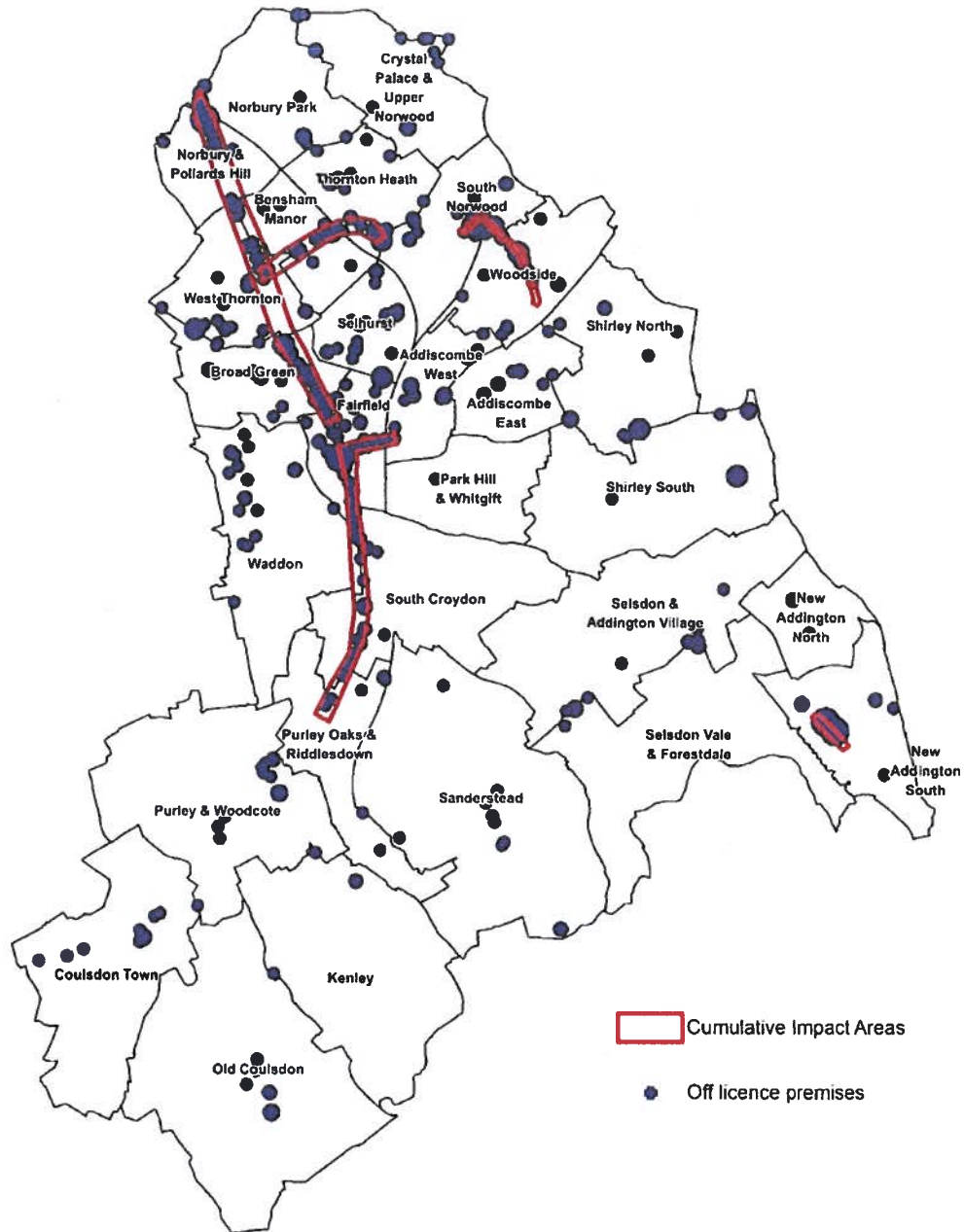
By looking at harm in the current CIA's, it has fallen for the second consecutive year and it is at its second lowest in 2021/22 in the last five years. In 2021/22, alcohol-related harm dropped by 7% compared to the year and compared to 2019/20 (pre-covid year) it has dropped by a fifth (20%).



In respect of the proposed new South Norwood CIA, both alcohol-related volume and harm have been at their highest in this area in 2021/22 over the five year period. By comparing 2021/22 to the year before, volume has gone up 62% and harm has gone up 294%. By

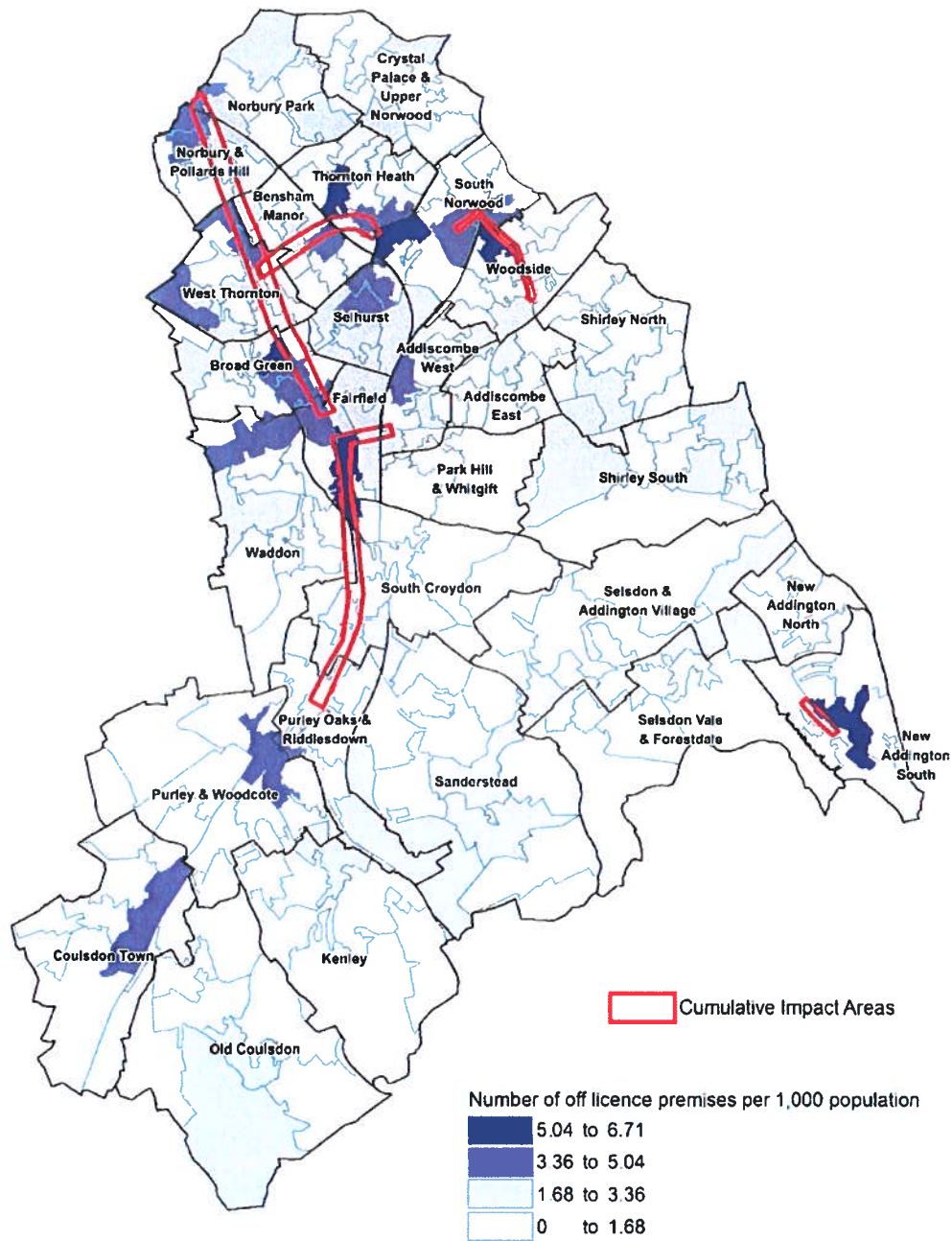


# Off Licence Premises in Croydon



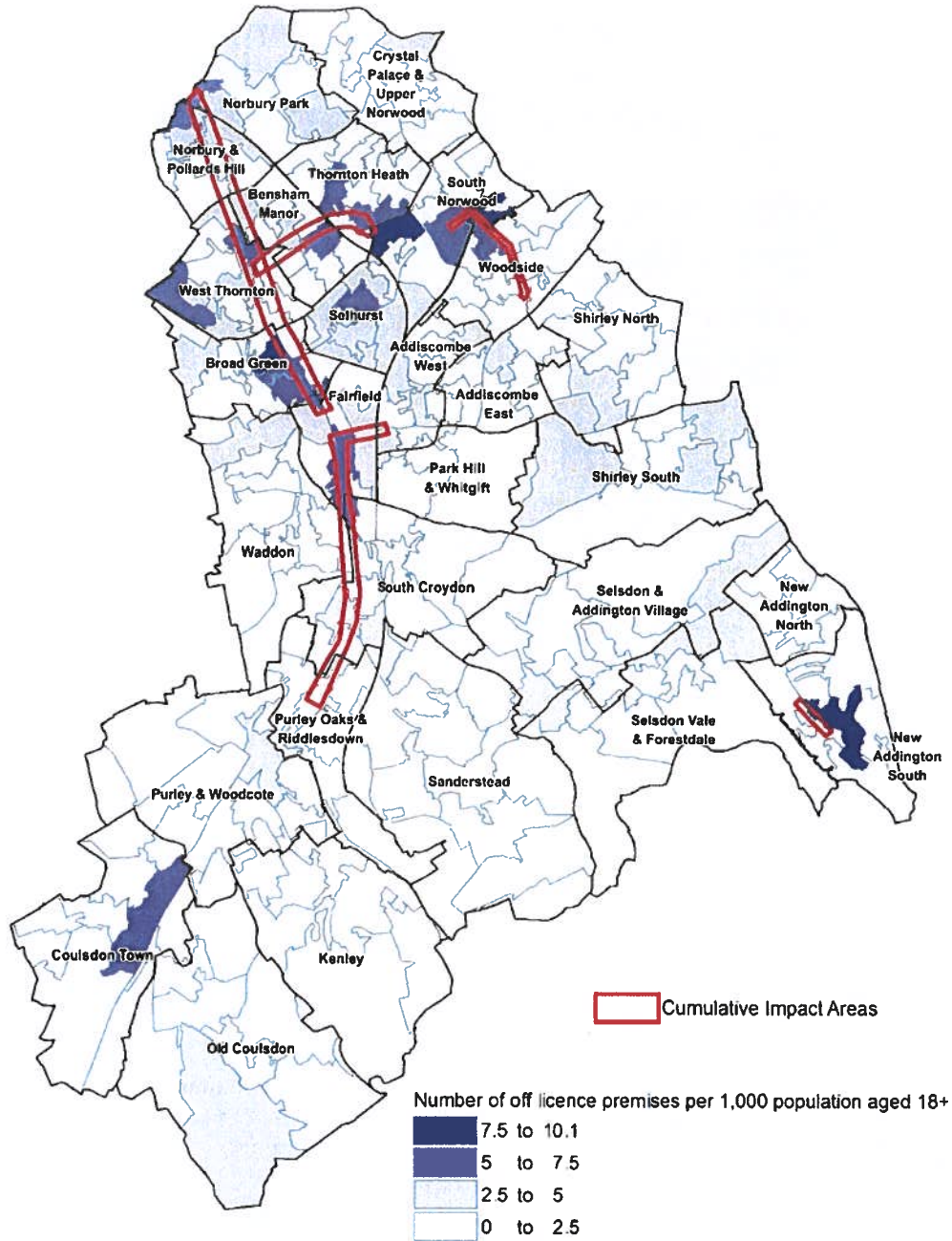
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## Off Licence Premises in Croydon: rate of premises per 1,000 population



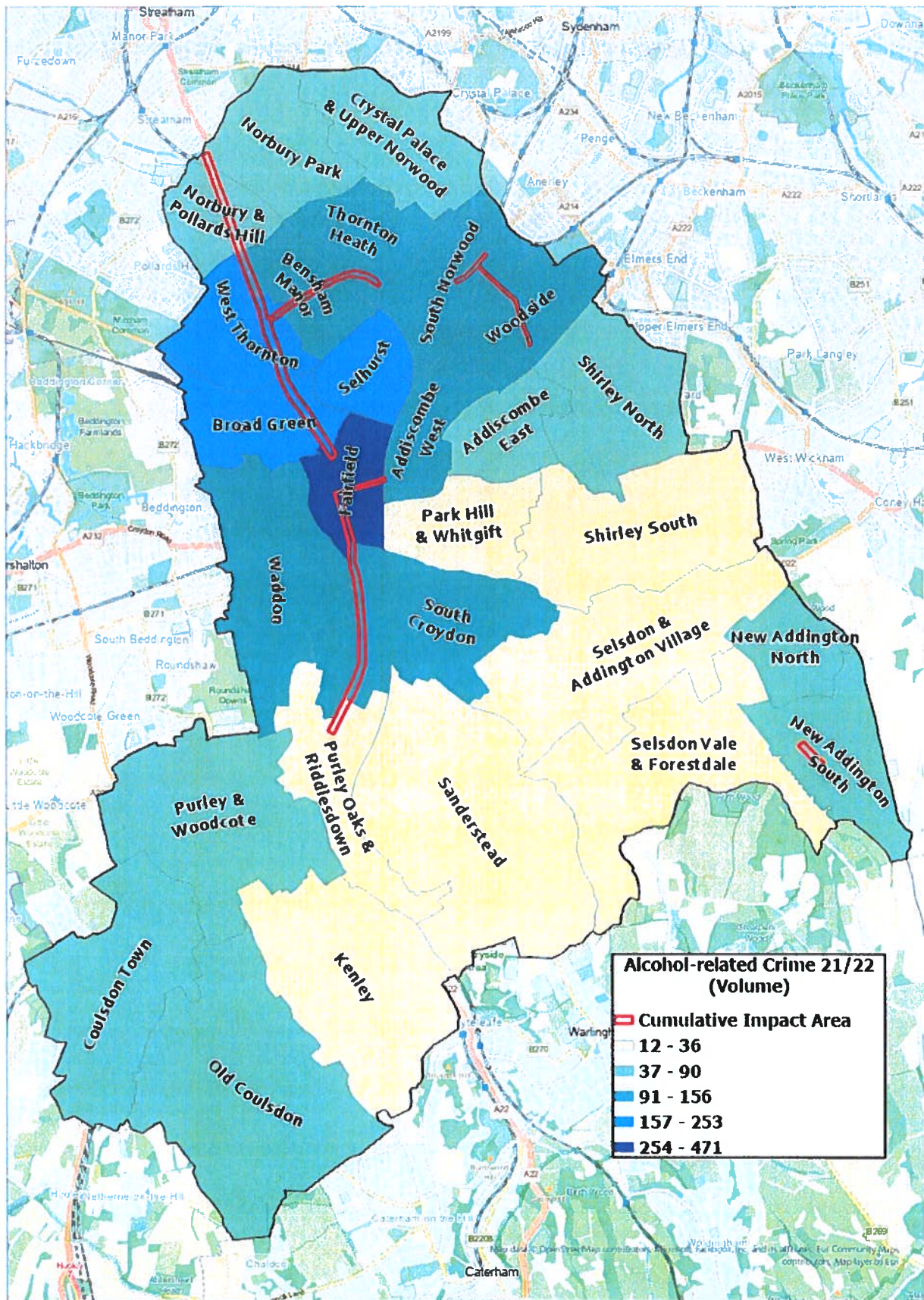
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# Off Licence Premises in Croydon: rate of premises per 1,000 population aged 18+

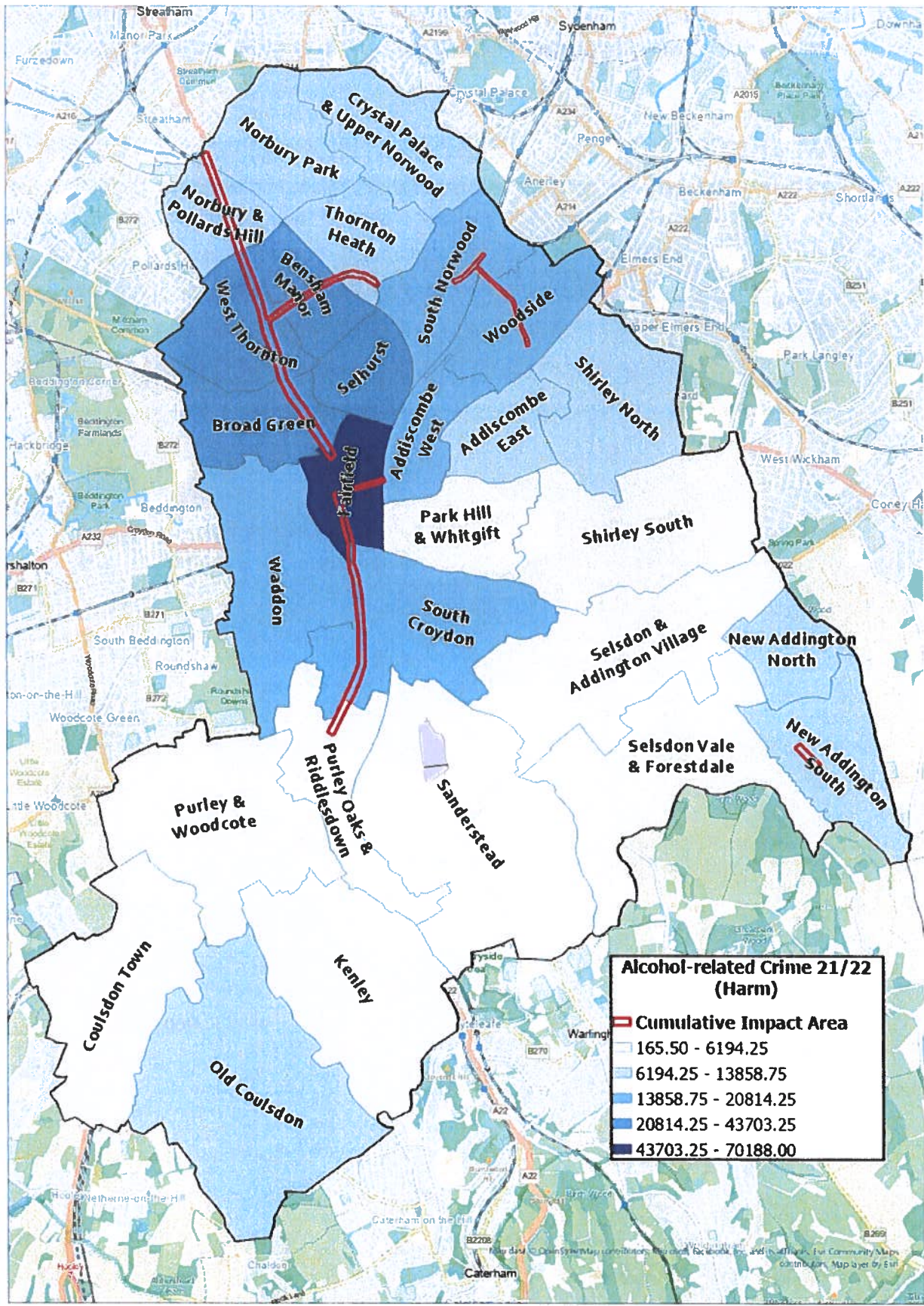


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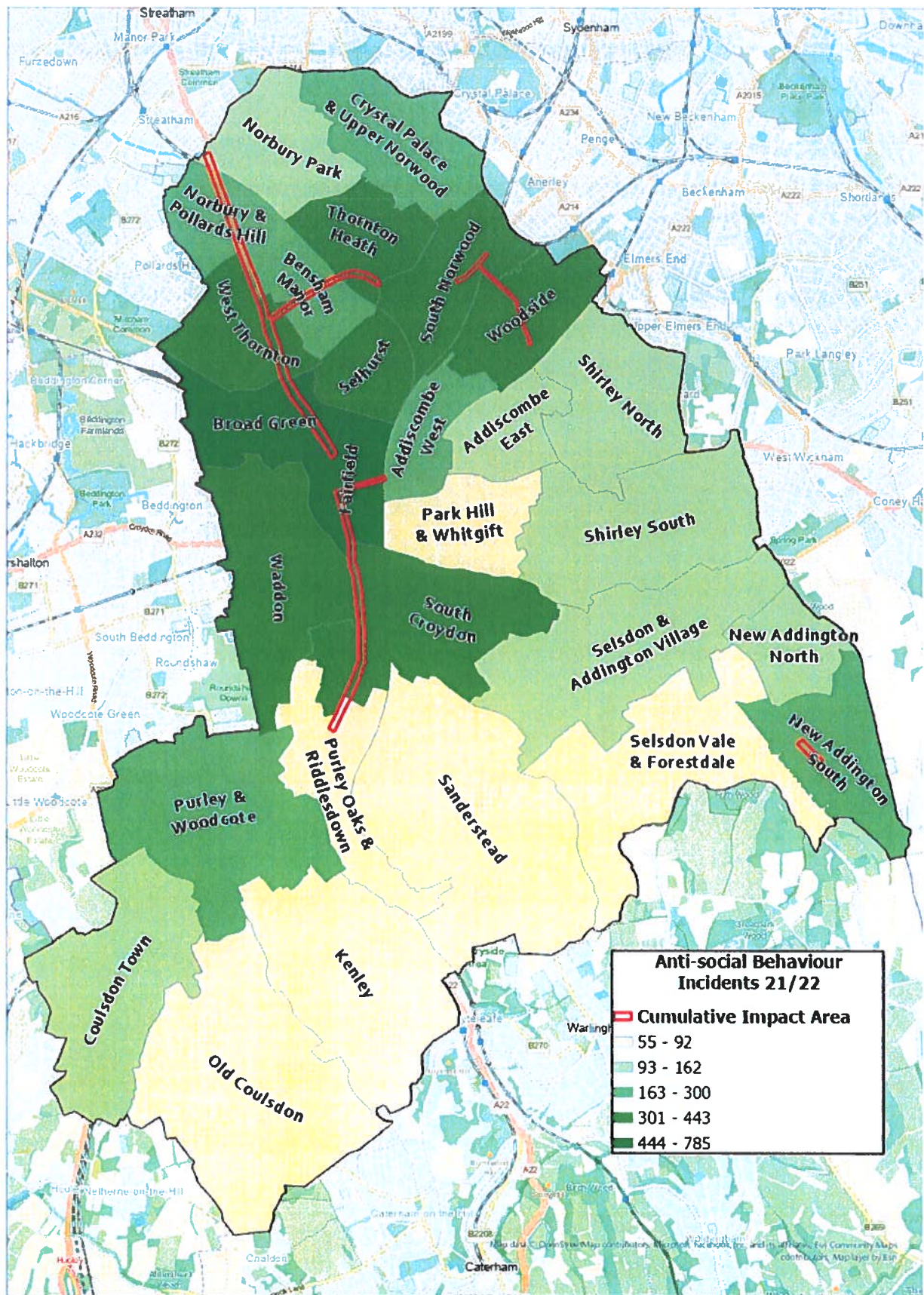




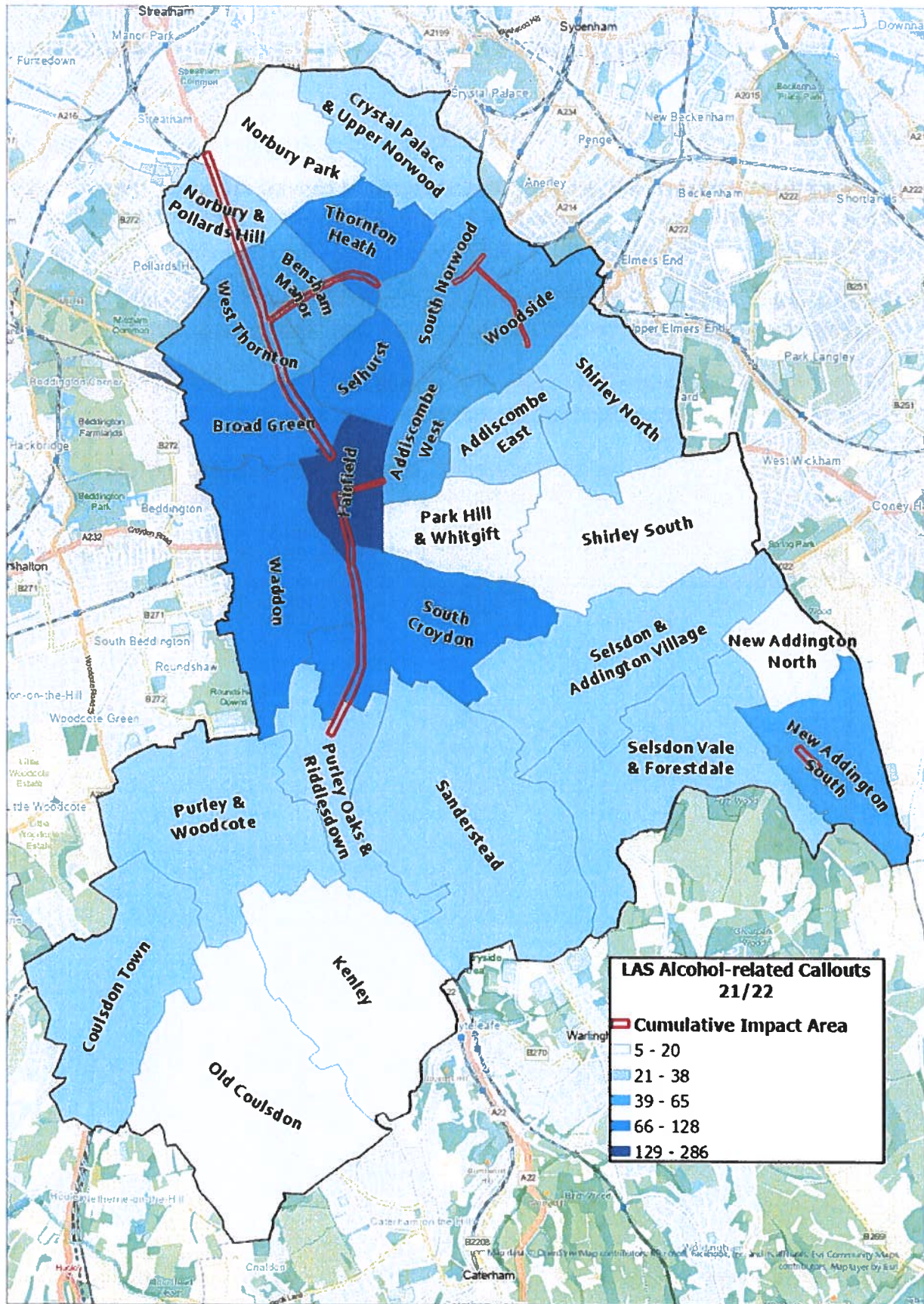












**CONTACT DETAILS, ADVICE and GUIDANCE**

If you require advice on making an application or about making representations on an application or about seeking a review of a licence or certificate, please contact the Council's licensing team on 020 8760 5466 or at [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk) .

Application forms are also available from the licensing team and details of:

- The names and addresses of Council, police and fire contacts able to give advice
- The responsible authorities under the legislation
- Advice on preparing operating schedules
- Pools of conditions
- Other guidance – for instance regarding personal licences, designated premises supervisors and temporary event notices

Alternatively, information, guidance and application forms can be obtained from the Home Office website at [www.homeoffice.gov.uk](http://www.homeoffice.gov.uk) .

# Equality Analysis Form

## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

<b>Directorate</b>	<b>Sustainable Communities, Regeneration and Economic Recovery</b>
<b>Title of proposed change</b>	<b>Statutory 5 Year Review of Licensing Policy</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Michael Goddard</b>



## 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

**The Council is the Licensing Authority for the purposes of the Licensing Act 2003. We process applications and issue licenses for premises, such as public houses, off licenses and restaurants. The Act also requires the Council to draw up a policy document which sets out how it will carry out its functions under the Act. The original Policy was prepared in 2004 and the Act states that the document must be reviewed every 5 years – even if no changes are proposed. We last reviewed the document in 2017, so are required to review it in 2022. The Policy is primarily to assist in ensuring the successful management of licensed premises. Licence holders and their customers are the primary stakeholders. There are no service users as such, as it is the legislation that permits the activity (providing licensable activities) and the Act also contains the sanctions for poorly managed premises. The Licensing Act 2003 and supporting Regulations are also quite prescriptive, on both licence holders and the Council as Licensing Authority and take primacy over the Policy. The Statement therefore, in the main, reflects the requirements of the legislation, statutory guidance & codes of practice. The Council's current policy also includes four cumulative impact areas that relate specifically to premises that are licensed for the sale of alcohol for consumption 'off' the premises. These areas are all corridors along specific roads and (also showing the borough wards they pass through) are –**

**CIA 1 - Along the Brighton Road; South End; High Street, George Street corridor, from the Royal Oak Centre on Brighton Road, Purley to the junction of George Street and Cherry Orchard Road in Central Croydon (Purley Oaks & Riddlesdown/South Croydon/Waddon/Fairfield)**

**CIA 2 - Along the London Road/Streatham High Road corridor, in 3 sections; from the junction of London Road and Tamworth Road in West Croydon to the j/w Canterbury Road; from the j/w Broughton Road to the j/w Melrose Avenue and; from the j/w Northborough Road to the borough boundary with London Borough of Lambeth (Fairfield/Broad Green/West Thornton/Bensham Manor/Norbury & Pollards Hill)**

**CIA 3 - Along the Brigstock Road and High Street, Thornton Heath corridor, from the junction of Brigstock Road and London Road in Thornton Heath to the junction of High Street, Thornton Heath and Whitehorse Lane (West Thornton/Bensham Manor/Thornton Heath)**

**CIA 4 - Along the length of Central Parade, New Addington (New Addington South)**

**It is proposed to retain the above 4 existing CIA's and in addition, a further proposal in the consultation on the review of the policy was the introduction of a new, 5<sup>th</sup> cumulative impact area along the length of High Street, South Norwood from the junctions with Oliver**

Grove and Station Road to the junction with Lancaster Road and Portland Road, South Norwood from the junction with High Street to the junction with Spring Lane (South Norwood/Woodside). If introduced, this would be CIA 5.

The effect of a Cumulative Impact Area is that where relevant representations are received on any new applications for a premises licence to sell alcohol off the premises, or on a material variation to an existing such premises licence there will be a presumption under the special policy that the application will be refused. Cumulative Impact is intended to be strict, and will only be overridden in genuinely exceptional circumstances however, the Licensing Authority will not apply these policies inflexibly. It will always consider the individual circumstances of each application; even where an application is made for a proposal that is apparently contrary to policy.

In the current policy document, the Council sets out that it recognises its legal obligation under the Equality Act 2010 to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between people who share a characteristic and those who don't. The Council will assess and consult on the likely impact and monitor for any adverse impact on the advancement of equality which may arise as a result of this Policy Document and will publish the results.

A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact. The EqIA has been updated to reflect the responses to the consultation, which did not provide any evidence of negative impacts in respect of each protected characteristic, proving useful service data for future use.

### 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

#### 3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact



For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>The policy supports the legislation which makes it an offence to sell alcohol to persons under 18. The introduction of cumulative impact areas is to assist with the negative impacts on the licensing objectives in the Licensing Act 2003 which include the prevention of crime and disorder and the protection of children from harm.</p>	<p>It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of premises that sell alcohol rather than individuals.</p>	<p>The four existing cumulative impact areas and the proposed new 5<sup>th</sup> one fall within the following twelve wards in the borough. Croydon Observatory statistics show the population by age %'s* in these wards to be as follows: Purley Oaks &amp; Riddlesdown 0-15 years 21% 16-64 years 64%. South Croydon 0-15 years 22% 16-64 years 67%. Waddon 0-15 years 24% 16-64 years 65%. Fairfield 0-15 years 21% 16-64 years 74%. Broad Green 0-15 years 26% 16-64 years 66%. West Thornton 0-15 years 24% 16-64 years 64%. Bensham Manor 0-15 years 23% 16-64 years 65%. Norbury &amp; Pollards Hill 0-15 years 21% 16-64 years 65%. Thornton Heath 0-15 years 24% 16-64 years 66%. New Addington South 0-15 years 26% 16-64 years 61%. South Norwood 0-15 years 23% 16-64 years 66%. Woodside 0-15 years 23% 16-64 years 67%.</p>

			<p>*The minimum age for the purchase of alcohol is 18 years so it would be better if these figures were able to reflect 0-17 years but they do nonetheless give a clear indication. The Council licenses the premises that alcohol is sold from. To mitigate risk to U18's, if a premises is found to be selling alcohol to U18's, enforcement action by review or prosecution can be taken.</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
Disability	<b>No perceived positive impact.</b>	<b>No perceived negative impact.</b>	The consultation did not highlight any specific concerns in relation to disability which were or were perceived to be impacted by the proposals in the policy.
Sex Gender Reassignment Identity Marriage or Civil Partnership Sexual Orientation Pregnancy or Maternity	Alcohol related crime harm shows that over half committed were sexual offences and around a third was violence related. Alcohol related crime is closely linked to domestic violence. Please note however – the consumption of alcohol is not a licensable activity and so the policy cannot directly	It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities	Crime Survey for England and Wales shows a strong relationship between alcohol and a range of crimes including violence. Council Violence Reduction Network (VRN) data shows that over

	<p>regulate that. The licensable activity is the sale of alcohol and the cumulative impact areas are to assist with the negative impacts on the licensing objectives in the Licensing Act 2003 which include the prevention of crime and disorder and the protection of children from harm.</p>	<p>in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of premises that sell alcohol rather than individuals.</p>	<p>60% of alcohol related crime volume in the borough in 21/22 was violence against the person. Alcohol related crime harm in the same period shows that over half committed were sexual offences and around a third was violence related. Alcohol related crime is closely linked to domestic violence. VRN data shows the proportion of all alcohol related crime volume flagged as domestic has been increasing over the last 5 years with over 40% of all crime being domestic in 21/22. In contrast though, the proportion of all alcohol related crime harm flagged as domestic has remained relatively stable over the last 5 years, with it being 27% in 21/22.</p> <p>Croydon Observatory statistics show the number of violence and sexual offences per 1000 persons between July 21 and June 22 in the wards in the borough in which the four existing cumulative impact areas and the proposed new 5<sup>th</sup> one fall to be as follows:</p> <p>Purley Oaks &amp; Riddlesdown 13 per 1000</p> <p>South Croydon 28 per 1000</p> <p>Waddon 36 per 1000</p> <p>Fairfield 86 per 1000</p> <p>Broad Green 45 per 1000</p>
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			<p>West Thornton 44 per 1000          Bensham Manor 27 per 1000          Norbury &amp; Pollards Hill 21 per 1000          Thornton Heath 40 per 1000          New Addington South 31 per 1000          South Norwood 32 per 1000          Woodside 30 per 1000</p> <p>To deal with/mitigate risk, licensed premises that are associated with crime and disorder can be dealt with by licence review or prosecution.</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
Religion or belief	It is acknowledged that there may be negative impacts from the consumption of alcohol and that religion and belief may impact on views as to the acceptability of consumption of alcohol but the statutory mechanisms and policy relate to among other matters, the regulation of sale of alcohol rather than regulating the consumption of alcohol, which is not a licensable activity and not something which the Council can legally seek to	It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of	Croydon Observatory statistics provide details of the makeup, in % terms of different religions in each of the 12 wards within which the four existing and the one new, proposed cumulative impact areas fall and that information can be found, under the Population heading, at the following link - <a href="#">Population - UTLA   Croydon</a>

control via its policy. However, the policy under consideration proposes cumulative impact areas which are a statutory mechanism available to Licensing Authorities subject to necessary evidence. Cumulative impact areas are areas where there is a perceived negative impact on the Licensing Objectives (protection of children from harm, prevention of public nuisance, prevention of crime and disorder and public safety) as a result of a proliferation of particular types of premises in certain areas which are together having a cumulative impact. The cumulative impact areas proposed (having regard to the evidence base as detailed in the report to Licensing Committee and the outcome of the consultation) for inclusion in the policy only relate to shops, supermarkets and off licenses that sell alcohol for consumption off the premises but are proposed with a view to mitigate the potential negative cumulative impact of a proliferation of these types of premises in the identified areas.

It must be noted that only the sale of alcohol is a licensable activity. Consumption of alcohol is not.

premises that sell alcohol rather than individuals.

[Report Builder for ArcGIS \(croydonobservatory.org\)](https://croydonobservatory.org)

To deal with/mitigate risk, licensed premises that are associated with crime and disorder can be dealt with by licence review or prosecution.

The policy proposals relate to the conduct of licence holders rather than seeking to control the behaviour of individuals in whether they choose to consume alcohol or not. Seeking to control the behaviour of individuals in whether they choose to consume alcohol or not, is not within the remit of the Licensing Regime. Non-Licensing measures such as public spaces protection orders can, subject to the necessary evidence, be used to control the consumption of alcohol in public places.

A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.

Race	<p>Data indicates that alcohol is a factor in crime and it could be deduced that the higher population percentage in each ward may be affected to a greater degree by the sale of alcohol in that area. As examples, in Purley Oaks &amp; Riddlesdown, this will be the predominantly white population of 65.6% and in Broad Green, this would be the predominate ethnic minority population of 72.7%. However, the introduction of cumulative impact areas is to assist with the negative impacts on the licensing objectives in the Licensing Act 2003 which include the prevention of crime and disorder and the protection of children from harm.</p>	<p>It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of premises that sell alcohol rather than individuals.</p>	<p>The four existing cumulative impact areas and the proposed new 5<sup>th</sup> one fall within the following twelve wards in the borough. The cumulative impact areas have been selected based on the data collated from public health and the violence reduction network. This data is detailed in the report to the Licensing Committee of 29 November 2022 and forms part of the proposed policy.</p> <p>Croydon Observatory statistics show the percentage split between the white and ethnic minority populations in each ward to be as follows:</p> <p>Purley Oaks &amp; Riddlesdown White 65.6% Ethnic Minorities 34.4%</p> <p>South Croydon White 59% Ethnic Minorities 41%</p> <p>Waddon White 50.7% Ethnic Minorities 49.3%</p> <p>Fairfield White 42.3% Ethnic Minorities 57.7%</p> <p>Broad Green White 27.3% Ethnic Minorities 72.7%</p> <p>West Thornton White 22% Ethnic Minorities 78%</p> <p>Bensham Manor White 24.7% Ethnic Minorities 73.3%</p>
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			<p>Norbury &amp; Pollards Hill White 31.2% Ethnic Minorities 68.8%</p> <p>Thornton Heath White 30.4% Ethnic Minorities 69.6%</p> <p>New Addington South White 73.7% Ethnic Minorities 26.3%</p> <p>South Norwood White 37% Ethnic Minorities 63%</p> <p>Woodside White 41.8% Ethnic Minorities 58.2%</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
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**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
<p>An initial report was taken to the Licensing Committee on 26 September to make them aware of the statutory requirement to review the existing policy and also of any proposed changes to the policy. There was then a 6 week public consultation between 4 October and 15 November 2022 following which a further report was prepared which was taken back before the Licensing Committee on 29 November with the outcome of the consultation and any responses received. Groups such as the BME Forum, the Asian Resource Centre and CVA were included in the consultation. The Licensing Committee recommended adoption of the revised policy and this will now be taken to Full Council.</p>		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

#### Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

**Table 4 – Equality Impact Score**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

<b>Risk Index</b>	<b>Risk Magnitude</b>
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

<b>Column 1</b>  <b>PROTECTED GROUP</b>	<b>Column 2</b>  <b>LIKELIHOOD OF IMPACT SCORE</b>  Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	<b>Column 3</b>  <b>SEVERITY OF IMPACT SCORE</b>  Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	<b>Column 4</b>  <b>EQUALITY IMPACT SCORE</b>  Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.  <b>Equality impact score = likelihood of impact score x severity of impact score.</b>
Age	2	1	2
Disability	1	1	1
Gender	2	1	2
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	2	1	2

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability Age Race Sex (gender) Gender reassignment Identity Sexual orientation	None	Enforcement action available, ie. review or prosecution. The policy also sets out that the Council will expect applicants to demonstrate in their application that suitable and sufficient measures have been identified and will be implemented	Responsible Authorities under the Licensing Act 2003, ie. Police. Residents may also apply for the	



<p>Pregnancy or maternity Marriage/civil partnership Religion or belief</p>		<p><b>and maintained so as to minimise or prevent crime and disorder in and around the vicinity of their premises. It then lists potential measures, such as installing cctv with cameras covering relevant areas, appropriate storage of alcohol, maintaining appropriate signage and a refusal log for refused sales of alcohol, appropriate instruction, training and supervision of those employed to prevent incidents of crime and disorder, provision of litter bins and security measures, such as lighting outside premises, not selling certain alcohol types/strengths (eg. high strength beers/ciders or single cans above 6% ABV and restricting sales on certain alcohol types, for example miniature spirits. In addition, licence holders are encouraged to adopt best practice, for instance those relating to drinks promotions ie. Point of Sale Promotions published by the British Beer and Wine Association. In addition, during the 28 day consultation</b></p>	<p><b>review of a premises licence.</b></p>	
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		<p>period after an application is submitted, responsible authorities, such as the Police and the Council’s Trading Standards service discuss with applicants and often agree amendments to applications to have further conditions attached to minimize the risk of crime and disorder. The policy states ‘It is essential that licensed premises are maintained and operated so as to ensure the continued promotion of the licensing objectives and compliance with the specific requirements of the 2003 Act and it is the responsibility of premises licence holders and designated premises supervisors (where applicable) to ensure this happens and that regulatory compliance is maintained.’</p>		
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**6. Decision on the proposed change**

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p><b>The Policy is primarily to assist in ensuring the successful management of licensed premises. Licence holders and their customers are the primary stakeholders. There are no service users as such, as it is the legislation that permits the activity (providing licensable activities) and the Act also contains the sanctions for poorly managed premises. The Licensing Act 2003 and supporting Regulations are also quite prescriptive, on both licence holders and the Council as Licensing Authority and take primacy over the Policy. The Statement therefore, in the main, reflects the requirements of the legislation, statutory guidance &amp; codes of practice. Enforcement action is available to the responsible authorities in the Licensing Act 2003 to deal with premises that are not promoting the licensing objectives. Please note that the policy has been updated to include at paragraphs 6.14 &amp; 6.15 which reflect the following -</b></p> <p><b>“6.14 Applicants and licensees must make themselves familiar with the law and their responsibilities set out within the Equality Act 2010 and relevant guidance for businesses, which can be found on the Equality &amp; Human Rights Commission website</b></p> <ul style="list-style-type: none"> <li>• The Act makes discrimination against any person (including employees and customers) unlawful.</li> <li>• Section 149 (7) of the Act defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.</li> <li>• Any activity in breach of the Act may be considered an offence and may lead to enforcement by the Equality and Human Rights Commission.</li> </ul> <p><b>6.15 The Council recognises its public sector equality duty under the Equality Act 2010 and the legal obligation to have due regard, when exercising its functions, to the need to eliminate unlawful discrimination, harassment</b></p>	X

# Equality Analysis

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	<b>and victimisation and other conduct prohibited by the Act, to advance equality of opportunity between people who share a protected characteristic and those who do not and to foster good relations between people who share a protected characteristic and those who do not.”</b>	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council’s ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

## 7. Sign-Off

<b>Officers that must approve this decision</b>	
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# Equality Analysis

<b>Equalities Lead</b>	<b>Name:</b> Gavin Handford <b>Date:</b> 02/12/2022 <b>Position:</b> Director of Policy, Programmes & Performance
<b>Director</b>	<b>Name:</b> <b>Date:</b> <b>Position:</b>



<b>REPORT TO:</b>	Full Council 14 December 2022
<b>SUBJECT:</b>	<b>Response to the Query from the External Auditor Relating to the Former Chief Executive’s Settlement Agreement</b>
<b>LEAD OFFICERS:</b>	Stephen Lawrence-Orumwense, Monitoring Officer
<b>WARDS:</b>	All
<b>PUBLIC/EXEMPT:</b>	Public

**SUMMARY OF REPORT:**

On 27 August 2020, the Appointments Committee, decided to terminate the employment of the former Chief Executive and approved a settlement agreement at a total cost to the Council of £437,973.

The Council’s External Auditor received a query from an elector relating to the entry on the Statement of Accounts 2020/21 about the settlement payment. On 17 January 2022, the External Auditor raised queries about the governance arrangement relating to the payment, whether it was value for money for Croydon taxpayers and the officer advice to members before reaching a decision on the payment.

The Council’s Monitoring Officers reported in April 2022 and October 2022 to the Appointment and Disciplinary Committee on the issues raised by the External Auditor. On 9 November 2022, the Appointments and Disciplinary Committee approved the response to the External Auditor’s queries and agreed that the response be submitted to Full Council for noting. Consequently, Full Council is asked to consider and note the Council’s response to the External Auditor’s query about the former Chief Executive’s settlement payment.

**COUNCIL PRIORITIES 2020-2024**

This report addresses the importance of good governance and ensuring decisions are robust.

**FINANCIAL IMPACT:**

There are no financial implications arising from this report.

**RECOMMENDATIONS:**

Council is asked to

1. Note the Council's response to the External Auditor's query and attached as Appendix 1. Note that the response is based on the Monitoring Officer's findings following due diligence enquiries undertaken.

**1. BACKGROUND**

- 1.1 On 27 August 2020, the Council's Appointments Committee, following advice from officers, resolved by a majority to terminate the employment of the former Chief Executive and approve a settlement agreement at a total cost to the Council of £437,973. (At the April 2022 meeting, the Appointment and Disciplinary Committee agreed that the minutes of the meeting of the 27 August 2020 be amended to reflect that a recorded vote was called for and that 2 Councillors requested that the Minutes reflect that they had voted against the recommendation to approve the settlement payment).
- 1.2 About 2 months later, on 23 October 2020, the Council's External Auditor issued a Report in the Public Interest. This concerned the Council's financial position and related governance arrangements and identified the Council's deteriorating financial resilience, low level reserves, poor governance practice and significant overspending over its approved budgets.
- 1.3 The Council's External Auditor received a query from an elector relating to the entry on the Statement of Accounts 2020/21 about the settlement payment made to the former Chief Executive. Consequently, in January 2022, the External Auditor raised queries about the governance arrangement relating to the payments, whether it was value for money for Croydon taxpayers and the officer advice to members before reaching a decision on the payment.
- 1.4. The Council's Monitoring Officers reported on 27 April 2022 and 13 October 2022 to the Appointment and Disciplinary Committee on the issues raised by the External Auditor. On 9 November 2022, the Appointment and Disciplinary Committee approved the response to the External Auditors queries and agreed that the response be submitted to Full Council for noting. A copy of the response is attached as Appendix 1. The Committee also decided that "For the avoidance of any doubt, and for the reasons set out in the Monitoring Officer's findings, the Committee does not endorse the decision of the August 2020 Appointments Committee that the settlement payments made to the former Chief Executive were value for money.

- 1.5 The recoument of the settlement payment to the former Chief Executive is still the subject of further legal consideration.

### **3. REASON FOR THE DECISION**

- 3.1 The response to the External Auditors queries enables the Council to clearly set out its position on an issue that has significant public interest.

### **4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 4.1 There are no financial implications arising from the recommendations in the report.

Approved by Nish Popat, Interim Head of Corporate Finance

#### **4.2 Risks**

4.2.1 A formal query has been raised about this settlement payment by the external auditor in relation to its lawfulness in governance terms and their assessment of the value for money opinion in the 2020/21 audit.

4.2.2 The settlement payment to the former Chief Executive has been a matter of considerable public interest since it was agreed.

4.2.3 If the query raised is not fully addressed and answered, it may lead to an adverse value for money opinion being recorded or a further use of statutory powers in relation to the matter by the external auditor.

### **5 LEGAL CONSIDERATIONS**

- 5.1 Under Section 20(1)(c) (General duties of auditors) of the Local Audit and Accountability Act 2014, the auditor must be satisfied that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. Under Section 24 Schedule 7 of the Local Audit and Accountability Act 2014 (Reports and Recommendations), the auditor has the power to issue a public interest report or issue written recommendations on any matter coming to the auditor's notice during the audit of the Council's accounts.
- 5.2 In accordance with usual practice, the settlement agreement referred to in this report contains a confidentiality clause which is expressly subject to certain exceptions which include complying with legal requirements. The limited amount of personal information about the former Chief Executive which is set out in this report is required by the Local Government Act 1972 and the Council's Constitution. This is because, in all the circumstances, there is an

overriding public interest justification in publishing the Council's response to the External Auditor's enquiry.

5.3 Approved by Director of Legal Services & Monitoring Officer.

## **6 HUMAN RESOURCES IMPACT**

6.1 There are no human resources implications arising from the recommendation in this report.

Approved by: Dean Shoesmith, Chief People Officer

## **7 EQUALITIES IMPACT**

7.1 Under section 149 of the Equality Act 2010, the Council has a duty when exercising its functions to have "due regard" to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act and advance equality of opportunity and foster good relations between persons who share a protected characteristic and persons who do not. This is the public sector equality duty.

7.2 In practical terms, decision makers must evidence consideration of any potential impacts of proposals on groups who share protected characteristics, before decisions are taken. This includes any decisions relating to how authorities act as employers; how they develop, evaluate and review policies; how they design, deliver, and evaluate services, and how they commission and procure services from others.

7.3 The protected characteristics are race and ethnicity, disability, sex, gender reassignment, age, sexual orientation, pregnancy and maternity, religion or belief and marriage and civil partnership.

7.4 This report pertains to the consideration of the arrangements surrounding the decision to enter into a settlement agreement with the former Chief Executive of the Council in August 2020. Consequently, there are no immediate equality considerations within the scope of the Equality Act 2010, arising from the content of this report.

Approved by: Barbara Grant, Programme Manager (PMO), on behalf of Denise McCausland, Equality Programme Manager.

## **8 DATA PROTECTION IMPLICATIONS**

8.1 The data protection and confidentiality implications have been considered in the Legal consideration above. The limited amount of personal information

disclosed in this report is fair and lawful and complies with data protection law and the Council's contractual obligations.

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**CONTACT OFFICER:** Stephen Lawrence-Orumwense, Director of Legal Services and Monitoring Officer. [Stephen.lawrence-Orumwense@croydon.gov.uk](mailto:Stephen.lawrence-Orumwense@croydon.gov.uk)

**APPENDIX:** Appendix 1 – The Council's Response



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## **Appendix 1**

### **The Council's Response**

#### **Query from External Auditor relating to former Chief Executive Settlement Agreement**

1. On 27<sup>th</sup> August 2020, the Council's Appointments Committee, following advice from officers, resolved to terminate the employment of the former Chief Executive and approve a settlement agreement at a total cost to the Council of £437,973.
2. About 2 months later, on 23<sup>rd</sup> October 2020, the Council's External Auditor issued a Report in the Public Interest. This concerned the Council's financial position and related governance arrangements and identified the Council's deteriorating financial resilience, low level reserves, poor governance practice and significant overspending over its approved budgets.
3. The Council's External Auditor received a query from an elector relating to the entry on the Statement of Accounts 2020/21 about the settlement payment made to the former Chief Executive. Consequently, in January 2022, the External Auditor raised queries about the governance arrangement relating to the payments, whether it was value for money for Croydon taxpayers and the officer advice to members before reaching a decision on the payment.
4. The Council's Monitoring Officers (in April 2022 and September 2022) made enquiries on the issues raised by the External Auditor. The Monitoring Officer made the following findings.
5. There were significant failings in the officer report to the August 2020 Appointment Committee meeting relating to the approval of the former Chief Executive's settlement agreement and consequently the decision making.
6. The report fails to set out the facts that gave rise to the breakdown in trust and confidence between the then former Leader and former Chief Executive, any wrongdoing by the Council, the reporting of this by the former Chief Executive and any attempts at conciliation or dispute resolution. Allied to this, was the absence of legal advice on the merits and chances of success of any potential Employment Tribunal (ET) claims by the former Chief Executive which should have informed the decision on the settlement. Generally, the report should have given members of the Appointment Committee all the relevant information to enable them to make an informed and reasoned decision.
7. There was no officer advice that explains the cost differential of £7,718.00 in the capped maximum settlement payment at ET tribunal for unfair / constructive dismissal of £88,519 and the actual payment for compensation for loss of employment of £96,237.00 made to the former chief executive. Also, there was

no officer advice on the £48,118.50 gross payment in lieu of notice and the basis for the compensatory payments.

8. There was a very optimistic analysis offered by officers of the former Chief Executive's position in the event of an ET claim (for example a cost award against the Council) in the absence of established facts or any information on any failings or wrongdoing by the Council and no legal advice provided on the merits and chances of success.
9. There was no mention of the efforts, if any, made by officers to negotiate or secure a lower quantum of financial settlement. Also, whether the option of seeking to negotiate or put forward a reduced settlement package had been explored. In effect, no information was provided to members as to whether the former Chief Executive's exit could have been secured at a lower cost.
10. The process for convening the meeting (i.e., notice and dispatch of agenda and report) of the Appointment Committee did not meet the requirements of the Constitution and was potentially unlawful. The Council's Protocol for decision making provides that: *"The Leader, Cabinet, a Cabinet Committee, a Non-Executive Committee or Sub-Committee shall not take any "relevant decision", as defined in article 1.8 below, until the following requirements have been complied with: 1.5 At least 5 clear working days before the proposed date and time for taking the final decision, the Council Solicitor shall send a copy of the report, or arrange for a copy of the report to be sent to all Members of the decision making body. 1.8 Relevant Decisions - A decision shall comprise a relevant decision if either: ..(f) is of such significance to the locality, the Authority or the services which it provides that the Executive Director is of the opinion that it should be treated as a relevant decision.*
11. The purpose of an agenda is to provide Councillors with advance notification of, and the detail of the business to be transacted at a particular meeting. The agenda item was titled 'Governance Matters'. This appears misleading and a more appropriate title would have been 'Employee Settlement Agreement' or 'Settlement Agreement relating to an Employee'.
12. The former Leader of the Council chaired the Appointments Committee. The circumstances that gave rise to the settlement agreement (i.e., breakdown in relationship) was between the former Leader and the former Chief Executive. There should be serious consideration given to how the Council manage any likely conflicts of interest by ensuring individuals who are the subject of the complaints "play absolutely no role in deciding whether those complaints should be settled by making an award to the complainant from public funds"<sup>1</sup>
- 12A. The settlement terms were the subject of extensive legal advice by external Solicitors. The report adequately reflected the legal advice provided. The

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<sup>1</sup> Paragraph 3.4 statutory guidance on special severance payment.

external Solicitors view (post settlement) is that, considering all the circumstances, 6 months' pay for settlement of potential claims for a senior post holder and officer was objectively justifiable.

13. The Appointments Committee had the requisite decision-making powers to approve the settlement agreement with the former Chief Executive. The Committee was acting within its constitutional authority. Based on the information and advice in the officer report at the time, the Committee's decision was not irrational. It is within scope of the decision that a reasonable local authority could have made at that time and with the information provided. The decision made to approve the terms of the settlement at the time (albeit tainted by poor and inadequate advice in the officer report) was lawful. However, for the avoidance of any doubt, for the reasons set out above and considering the Reports in the Public Interest in 2020 and 2021, the Council should not have agreed to settlement payments.
14. The best value duty requires the Council to secure value for money in its decisions. From the report, there was regard to the fact that pursuing other options was likely to be a long-drawn-out process, time consuming, adversely affect the conduct of the Council's business and could be difficult to manage, and costly. At the time, the assessment was that a settlement payment was the most prudent and commercial use of public money. This was balanced against the cost of investigating the breakdown in relationship, any disciplinary action, potential ET claims, and ongoing salary cost of the former Chief Executive remaining in post. On balance and based on recent case experience and the comparative analysis in the Monitoring Officer April 2022 report, it is acknowledged that at the time the settlement payment to secure the exit of the former Chief Executive was cost effective and value for money. However, for the avoidance of any doubt, for the reasons set out above and considering the Reports in the Public Interest in 2020 and 2021, the Council should not have agreed to settlement payments.
15. The Council must clearly demonstrate that lessons have been learnt and that it has now embedded best practice in the form of the recent statutory guidance on severance payments available here <https://www.gov.uk/government/publications/special-severance-payments/statutory-guidance-on-the-making-and-disclosure-of-special-severance-payments-by-local-authorities-in-england><sup>2</sup>. The exit of the former

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<sup>2</sup> The Guidance sets out the issues that the Council must consider in making exit payment including the economic rationale, seeking legal advice on the prospect of successfully defending potential ET claims arising, the chances of success and the likely cost which should be weighed against the cost of the exit payment. Also, the need to manage conflicts of interest by ensuring individuals who are the subject of the complaints "play absolutely no role in deciding whether those complaints should be settled by making an award to the complainant from public funds". The guidance also requires accountability for such payments depending on the value, by Full Council, Head of Paid Service, Leader and with input from the Section 151 Officer and Monitoring Officer.

Head of Paid Service has significant local and wider public interest. There should have been proper records kept of the conversations between the Leader, Monitoring Officer, former Chief Executive, Section 151 Officer, and Director of HR relating to the exit. There should have been some initial enquiries to establish the facts and to inform any future decision making. Legal advice (Counsel's opinion) should have been sought on merits, chances of success and quantum of damages of any potential ET claim. This should have informed the decision on settlement. The ethos of the Openness and Accountability in Local Pay Guidance, as the title clearly suggest, is that there should be more transparency and scrutiny of senior officer's exit payment. It appears that concerns about potential leaks were given priority over adhering to constitutional and statutory requirements for notice and agenda papers to be sent to members in advance of the meeting. Democratic Services must attend the closed session of meetings to make sure proper minutes are taken of the deliberations that informed the decision made. There must be consideration given to managing any conflicts of interest arising. The Council must now assure itself of the following.

- a) The requirements of the statutory guidance on special severance payments are embedded into its policies, practice, and procedures.
- b) That proper records are kept of any conversations, discussions, or meetings of any potential settlement agreements with an employee.
- c) That reasonable enquiries are made to establish all the facts, events, and circumstances that give rise to any proposed settlement agreement, including any wrongdoing by the parties involved.
- d) That legal advice is sought on merits and chances of success of any potential claim against the Council and quantum of damages awarded. This should inform the decision on any potential settlement payment.
- e) There is compliance with the governance arrangements relating to the decision-making on settlement payments.
- f) That officers and members that are the subject of the dispute are not involved in the decision-making relating to the proposed settlement agreement.
- g) That Democratic Services attend both the open and exempt part of any committee meeting for approval of settlement payments. That proper minutes of the meeting are taken so that there is an understanding of the reasons for the decision and the deliberation by the committee.

**End**



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## LONDON BOROUGH OF CROYDON

<b>REPORT:</b>	<b>COUNCIL</b>	
<b>DATE OF DECISION</b>	<b>14 December 2022</b>	
<b>REPORT TITLE:</b>	<b>South London Waste Plan Development Plan Document - Adoption</b>	
<b>CORPORATE DIRECTOR / DIRECTOR:</b>	<b>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration &amp; Economic Recovery Heather Cheesbrough, Director of Planning &amp; Sustainable Regeneration</b>	
<b>LEAD OFFICER:</b>	<b>Julia Dawe - Plan Making Team Leader Steve Dennington – Service Head for Spatial Planning and Interim Service Head for the Growth Zone and Regeneration Email: <a href="mailto:Julia.dawe@croydon.gov.uk">Julia.dawe@croydon.gov.uk</a> <a href="mailto:Steve.Dennington@croydon.gov.uk">Steve.Dennington@croydon.gov.uk</a></b>	
<b>LEAD MEMBER:</b>	<b>Cllr Jeet Bains, Cabinet Member for Planning &amp; Regeneration</b>	
<b>KEY DECISION?</b>	<b>Yes</b>	<b>KEY DECISION REFERENCE NO.: 6022EM</b> REASON: Document will form part of the Policy Framework as a Local Development Framework Development Plan Document
<b>CONTAINS EXEMPT INFORMATION?</b>	<b>NO</b>	
<b>WARDS AFFECTED:</b>	<b>All</b>	

### 1 SUMMARY OF REPORT

- 1.1 In order to have an up-to-date planning framework to make decisions on proposals on sites which process waste, in addition to the Local Plan, there is a separate Waste Plan. It will form part of the Council’s Planning Policy Framework to spatially manage waste and be used to determine related planning applications. The production of the South London Waste Plan (SLW Plan) has been undertaken jointly by the four London boroughs of Merton, Kingston, Sutton and Croydon and has been funded in full from a successful bid to the Department for Levelling Up, Housing & Communities, Planning Delivery Fund.
- 1.2 This is the final stage of the production of the South London Waste Plan following two stages of consultation in October- December 2019 (Regulation 18 Issues and Options)

and September – October 2020 (Regulation 19 Submission), the Examination in Public in September 2021 and receipt of Secretary of State appointed Planning Inspectors' report. This adoption stage represents the final stage in the progression of the preparation of the joint South London Waste Plan Development Plan Document for adoption.

- 1.3 Executive Mayor Perry recommended in Cabinet on 16 November 2022 that Council should adopt the SLW Plan. The SLW Plan Cabinet Report can be viewed as Appendix D.

## **2 RECOMMENDATIONS**

For the reasons set out in the report and appendices A, B, C and D Council is recommended:

- 2.1 To adopt the South London Waste Plan 2022 to 2037, subject to the recommendations in the Inspector's Report as a Development Plan Document in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012.

## **3 REASON FOR RECOMMENDATIONS**

- 3.1 As the current South London Waste Plan ends this year, it is important for residents that a replacement plan is in place with up-to-date and robust policies that can be used to consider planning applications for waste facilities.

## **4 BACKGROUND AND DETAILS**

### **PREPARATION OF THE SOUTH LONDON WASTE PLAN 2022-2037**

- 4.1 In 2012, the London boroughs of Croydon, Sutton, Kingston and Merton, working jointly produced and adopted the South London Waste Plan (Development Plan Document) 2012-2022. This had the aim of providing policies for making decisions on planning applications for waste use and safeguarding a range of existing waste sites for waste management purposes with designated sites appearing on the boroughs' Planning Policies Maps. The plan also safeguarded existing waste sites and identified areas which may be suitable for waste use. The South London Waste Plan 2022-2037 supersedes the 2012 waste plan that seeks to provide continuous planning policy coverage to determine waste planning applications.
- 4.2 The draft SLW Plan for 2022-2037 was consulted upon twice between October and December 2019 (regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 generally known as 'Issues and Options') and between September and October 2020 (regulation 19 generally known as 'Submission'). It was submitted to the Planning Inspectorate in January 2021 and an Examination in Public

(EiP) was held in front of the Secretary of State's appointed panel of two Inspectors in September 2021 with subsequent correspondence since to identify the Main Modifications required to make the plan sound, including;

- Written response to the Inspectors' preliminary matters and initial questions in March 2021 on targets, the new London Plan and queries about sites,
- Written responses to the Inspectors' detailed "Matters, Issues and Questions" in July 2021 that formed to subject areas for the Examination in Public.

4.3 A further round of consultation to support the Examination was undertaken on [the main modifications and associated evidence](#), the "Main Modifications" between 14 July and 2 September 2022. As this consultation was undertaken after the submission of the SLW Plan the consultation responses were sent to the Inspectors to take into account when writing their report. In summary the Main Modifications are;

- Amendments required to achieve general conformity with the London Plan (published 2021): The Spatial Development Strategy for Greater London
- Adjustments to ensure that the SLW Plan accords with national policy in terms of (amongst other things) heritage assets, amenity protection, design and waste management
- Changes to ensure that robust monitoring arrangements are in place to secure the effectiveness of the Plan, and
- A number of other modifications to ensure that the Plan is legally compliant, positively prepared, justified, effective and consistent with national policy.

4.4 The Inspectors' report has now been received and finds the SLW Plan sound subject to the modifications that have been consulted upon mentioned above. In addition, some very minor amendments to the detailed wording of the Main Modifications are necessary for consistency or clarity. The Inspectors made these amendments and do not require further consultation as none of the amendments significantly alters the content as published for consultation or undermines the participatory processes and sustainability appraisal that had been undertaken.

## **ADOPTION OF THE PLAN**

4.5 Adoption is required of the SLW Plan before the end of 2022. This will be undertaken by each of the four local authorities, seeking approval for the SLW Plan to be adopted as part of their policy framework, as this Council is recommended to do. Adoption by the end of 2022 is driven by the updated National Planning Policy Framework (NPPF), requiring that a Development Plan Document has a lifespan of 15 years *from adoption*. The SLW Plan has a lifespan of 2022 to 2037, which means it has to be adopted by all four authorities in 2022 to meet the NPPF requirement.

## **5 ALTERNATIVE OPTIONS CONSIDERED**

- 5.1 **Adopt the SLW Plan** – this will provide the boroughs with an up-to-date Development Plan based on local evidence and local knowledge to use to spatially manage waste and determine planning applications.
- 5.2 **Delay or do not adopt the SLW Plan** – the adopted South London Waste Plan 2012 expires at the end of 2022 so should the new plan not be adopted there would not be a Development Plan in 2023. The fall -back position would be to use the guidance in the National Planning Policy Framework to determine planning applications. The NPPF being the national guidance is a one size fits all approach so local issues may not be able to be adequately addressed.
- 5.3 If adoption is delayed to 2023 the boroughs would need to produce new additional supporting evidence and changes to the SLW Plan such as to analyse the latest Environment Agency waste data, recalculate all the waste figures in the SLW Plan, and make any other consequential alterations, resubmit this to the Inspectors and undertake an additional round of consultation which will be time consuming and costly. To avoid this, the boroughs need to accept all the recommendations in the Inspectors' Report and allow the final SLW Plan to be adopted by all the partner Councils by the end of December 2022.

## 6 CONSULTATION

- 6.1 There have been two rounds of consultation undertaken as required by regulations 18 and 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. These rounds of consultation were used to develop the policies in the SLW Plan before it was submitted for Examination. A further Main Modifications consultation on the instruction of the Inspectors took place this summer to address issues raised during the Examination. The Inspectors will have taken into account the responses to the Main Modifications in their report and make a recommendation on SLW Plan soundness. As required by the Regulations a full report of the consultations undertaken was part of the bundle submitted with the SLW Plan to the Secretary of State.
- 1.4 Scrutiny (Streets and Environment Sub-committee) at their meeting on 8 November received 16 November 2022 Cabinet Report for consideration concerning the recommendation to Council to adopt the SLW Plan. There were no actions or requests arising from the consideration by Scrutiny.

## 7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1 The adoption of the South London Waste Plan will support the priorities of the Mayor's Business Plan 2022-2026 and in particular priority 4 – "Croydon is a cleaner, safer and healthier place, a borough we're proud to call home". This is because the SLW Plan enables Croydon to plan for the management of waste and recycling, taking account of the growth in the population and the emerging London Plan's waste apportionments.

## 8. IMPLICATIONS

### 8.1 FINANCIAL IMPLICATIONS

8.1.1 In 2018, the four boroughs successfully bid for £136,594 from the government Planning Delivery Fund for joint working to produce a new SLW Plan. Not all of this funding has been spent and finalising the SLW Plan towards adoption will continue to be funded from this grant award. The London Borough of Sutton manages the project budget, with support from the existing resource of the Croydon Plan Making Team – Spatial Planning, Growth Zone and Regeneration, and this stage of the Plan’s production and adoption does not create any budget pressure for Croydon Council. There are sufficient budget monies available to complete the project as the large expense of the examination which has been held is now known and has been paid for. To date £100,869 of this £136,594 budget has been spent. The remaining budget will be spent finalising the plan based on the approval of this report.

#### 8.1.2 Revenue and Capital consequences of report recommendation

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2022/23 £'000	2023/24 £'000	2024/25 £'000	2025/26
<b>Revenue Budget Available</b>				
Expenditure	36	0	0	0
Income	(36)	0	0	0
<b>Effect of decision from report</b>				
Expenditure	36	0	0	0
Income	(36)	0	0	0
<b>Remaining Budget</b>	0	0	0	0
<b>Capital Budget available</b>				
Expenditure	0	0	0	0
Income	0	0	0	0
<b>Effect of decision from report</b>				



Expenditure	0	0	0	0
Income	0	0	0	0
<b>Remaining Budget</b>	0	0	0	0

The project is being fully funded by a government grant and supported by the existing resource in Spatial Planning, Plan Making Team and can be delivered with the current establishment staff level. Post adoption the SLW Plan will provide a planning framework to determine waste proposals, so should reduce the likelihood and costs associated with planning appeals.

Approved by: Darrell Jones, Acting Head of Finance for Sustainable Communities Dated 30.11.22. (checked by Kay Oshin)

## 8.2 LEGAL IMPLICATIONS

8.2.1 As waste planning authorities, all four of the boroughs have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008) (as amended).

8.2.2 The Housing and Planning Act 2016, gives the Secretary of State greater powers to intervene in the Local Development Plan making process. Specifically, it would allow the Secretary of State to intervene if a local authority was failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a Local Development Plan.

8.2.3 The SLW Plan has been produced according to the Planning and Compulsory Purchase Act (2004, as amended) and the Town and Country Planning (Local Planning) (England) Regulations as set out in the report.

Approved by: Samra Yunus Corporate Solicitor on behalf of Stephen Lawrence – Orumwense, the Director of Legal Services and Monitoring Officer Date approved: on 28<sup>th</sup> November 2022

## 8.3 EQUALITIES IMPLICATIONS

8.3.1 The Sustainability Appraisal, accompanying the Draft South London Waste Plan, included a comprehensive Equalities Impact Assessment covering all four boroughs involved.

8.3.2 The Equalities Impact Assessment outlined the benefits that the proposal would provide to protected characteristics in the borough. The EQIA found that the proposal would support residents who were minoritized for socio economic reasons, along with the Global Majority and single mothers by providing useful employment in the circular economy. The proposals will yield a range of jobs for the aforementioned Croydon residents. Further details can be found in on pages 27-28 of Appendix 3 (Equality Impact Assessment)

Approved by: Denise McCausland (– Equality Programme Manager Dated 24 November 2022)

## OTHER IMPLICATIONS

### 8.4 HUMAN RESOURCES

- 8.4.1 There are no Human Resource impacts as the production and adoption of the South London Waste Plan is set out in the Spatial Plan, Growth Zone and Regeneration Service Plan and can be delivered with the current establishment staff level. If any issues arise these will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Housing Directorate & Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoesmith, Chief People Officer. Date approved: 1 December 2022

## 9. APPENDICES

### 9.1 Appendix A The Draft South London Waste Plan

*Available online via [Draft South London Waste Plan](#)*

**Appendix B** Sustainability Appraisal of the Draft SLWP

**Appendix B2** Sustainability Appraisal Addendum Report on Proposed Modifications

*Available online via*

[Sustainability Appraisal Of the Draft London Waste Plan](#)

[Sustainability Appraisal of the Draft South London Waste Plan with proposed modifications](#)

**Appendix C** Inspector's Final Report

**Appendix C1** Schedule of Main Modifications

**Appendix C2** Drafted Safeguarding Site – Chessington

**Appendix C3** Main Modifications Monitoring Table

**Appendix C4** Main Modifications

**Appendix D** South London Waste Plan – Cabinet Report – 16 November 2022

*Available online via*

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=2987>

## BACKGROUND DOCUMENTS

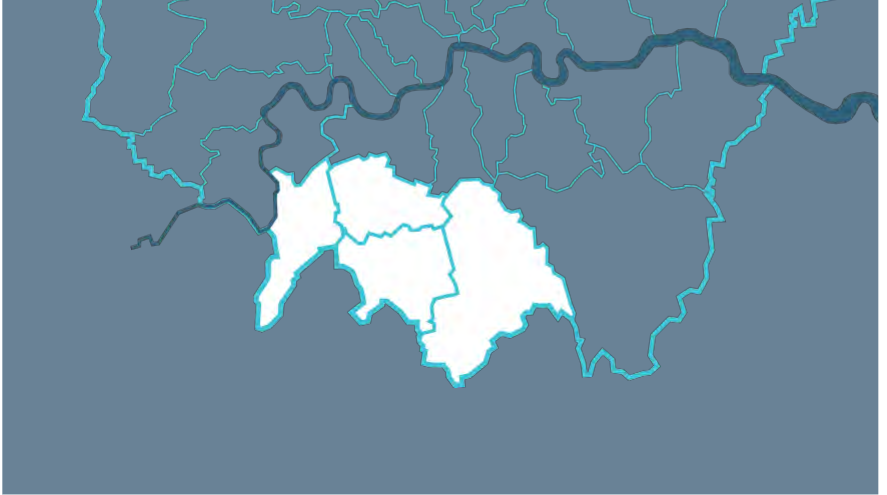
[South London Waste Plan 2011-2021](#)

[South London Waste Plan Issues and Preferred Options Document \(2019\)](#)

[South London Waste Plan Submission Draft \(2020\)](#)

[Consultation Statement South London Waste Plan](#)  
[Scrutiny 8 November papers](#)  
[Waste Framework Directive \(2008\)](#)  
[Planning and Compulsory Purchase Act \(2004, as amended\)](#)  
[The Town and Country Planning \(Local Planning\) \(England\) Regulations](#)  
[2012](#)  
[National Planning Policy Framework](#)  
[National Planning Policy for Waste](#)  
[The London Plan \(2021\)](#)

- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London **Waste Plan**



## **Draft for Submission to Government Consultation Document**

**September 2020**





## The Publication and Request for Representations

This is the Submission Version of the South London Waste Plan 2021-2036.

The South London Waste Plan is a joint document produced by the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton to guide the development of waste treatment facilities across the four boroughs. It includes policies to guide waste treatment development and safeguards existing sites.

This document is termed the Submission Version because it is intended to be submitted to the Secretary of States for Housing, Communities and Local Government for Examination-in-Public.

The publication of the Submission Version of the South London Waste Plan is undertaken to meet the requirements of Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012.

An accompanying Sustainability Appraisal is also available for consultation.

### Representations to be made

from Friday 4 September to Thursday 22 October 2020

The planned timetable for the South London Waste Plan is also follows:

<b>February - June 2019</b>	Evidence Gathering
<b>October - December 2019</b>	Issues and Preferred Options Consultation
<b>September - October 2020</b>	Submission Version Representations
<b>November 2020</b>	Submission to the Secretary of State
<b>January 2021</b>	Examination-in-Public
<b>March onwards</b>	Adoption



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# The South London Waste Plan – What It Is

- 1.1 The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 to 2036. It is to be used for the determination of planning applications relating to waste facilities (i.e. a facility on a site where waste is sorted, processed, recycled, composted or disposed of or a facility on a site where waste is mainly delivered for bulking prior to transfer to another place for processing, recycling, composting or disposal). Development for waste facilities should only be allowed in accordance with this plan and other documents and plans which constitute a borough's Development Plan, unless material considerations indicate otherwise.



- 1.2 The South London Waste Plan is a joint Development Plan Document and will form part of the Development Plans for the London Borough of Croydon, Royal Borough of Kingston, London Borough of Merton and London Borough of Sutton.
- 1.3 Most adopted plans within a borough's Development Plan, such as a Local Plan or Core Strategy, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies of the Mayor of London's London Plan, which is also part of the Development Plan. Therefore, for the development of a waste facility, a number of adopted plans and supplementary planning documents will have to be consulted.
- 1.4 For further information, in the first instance, visit the planning policy pages of the relevant borough's website:
- [www.croydon.gov.uk/planningandregeneration/framework](http://www.croydon.gov.uk/planningandregeneration/framework)
  - [www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/285/development\\_plan\\_documents](http://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/285/development_plan_documents)
  - [www.merton.gov.uk/planning-and-buildings/planning/localplan](http://www.merton.gov.uk/planning-and-buildings/planning/localplan)
  - [www.sutton.gov.uk/planningpolicy](http://www.sutton.gov.uk/planningpolicy)
- 1.5 The London Plan can be accessed at:  
[www.london.gov.uk/what-we-do/planning/london-plan](http://www.london.gov.uk/what-we-do/planning/london-plan)





## Introduction

### Background

- 2.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In 2007, the four boroughs decided to plan for waste collaboratively and produce a joint Development Plan Document (DPD), covering the principal types of waste such as household, commercial and industrial and construction and demolition waste. This resulted in the production of the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. This South London Waste Plan is the replacement document and covers the period 2021 to 2036.
- 2.2 The South London Waste Plan sets out the partner boroughs' long-term vision, spatial strategy and policies for the sustainable management of waste over the next 15 years. Policies and site safeguarding set out in detail how the four boroughs will meet their waste management targets and limit the impact of waste facilities.
- 2.3 The South London Waste Plan boroughs should prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008, as amended). This plan must set out an analysis of the current waste management situation and future forecasts, an assessment of the need for waste installations, location criteria for sites and policies.
- 2.4 The "National Planning Policy for Waste" (NPPW), published in 2015, sets out the Government's waste planning policies which all Waste Planning Authorities must have regard to when developing local waste plans. The NPPW is supplemented by the "Planning Practice Guidance" section on waste which provides further detail on how to implement the policies.
- 2.5 The NPPW states that Waste Planning Authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

## Planning for Waste

### The Waste Hierarchy

- 2.6 The underlying philosophy for the management of waste is reflected in the waste hierarchy which ranks waste options according to a priority and is usually shown in an inverted pyramid-like diagram, see overleaf. The ranking of the various waste management options is based on current scientific research on how the options would impact on the environment in terms of climate change, air quality, water quality and resource depletion.
- 2.7 The waste hierarchy illustrates the principle that the top priority for waste is to prevent creating it in the first place, then it is re-use, recycled, recovered and finally disposed of (e.g. landfill). This is a spatial planning document so it does not directly concern itself with the prevention of waste but it does seek to manage waste in the highest levels possible.





### National Drivers

2.8 The Waste Management Plan for England (2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and the management of waste. To that effect, it encourages waste planning authorities to:

- Deliver sustainable and efficient facilities
- Consider waste management alongside other requirements such as transport, housing and jobs
- Ensure businesses and residents are engaged
- Drive waste up the Waste Hierarchy

2.9 The way that waste authorities need to deliver effective waste planning is to apply the principles of self-sufficiency and proximity (commonly referred to as the "proximity principle"). This, in theory, expects waste authorities to deal with their own waste but there is no expectation that each local authority should deal solely with its own waste and instead should strive for net self-sufficiency. However, planning over a larger area such as that covered by the South London Waste Plan boroughs does provide for a more strategic and sustainable approach to waste in this area.

## Regional Drivers

2.10 The regional driver for the South London Waste Plan is the Mayor of London through the London Plan. This plan takes into consideration the policies and targets of the 2019 Intend to Publish (ItP) London Plan.

2.11 The 2019 ItP London Plan reflects the general philosophy of the waste hierarchy as well as national guidance but, in informing the South London Waste Plan, it sets out how this should be achieved in London. In particular, the 2019 ItP London Plan reiterates the targets for waste management set out in the Mayor’s London Environment Strategy (2018), namely:

- No biodegradable or recyclable waste to landfill by 2026
- 65% of ‘municipal’ (household and business) waste recycled by 2030, comprising: 50% Locally Authority Collected Waste recycled by 2025; and 75% business recycled by 2030
- 95% of construction, demolition and excavation waste to be recycled by 2020

2.12 The strategic approach and policies in the London Plan are based on the forecast amount of waste that needs to be planned for: the arisings. These are then transformed into apportionments for individual boroughs based on criteria on the scope of a borough to manage waste. These have informed this South London Waste Plan and more information on the apportionments are set out in Section 4 (Policy WP1 and WP2).

2.13 In order to meet the apportionment and targets, the 2019 ItP London Plan requires boroughs to:

- Safeguard existing sites
- Provide new waste management sites where required
- Optimise the waste management capacity of existing sites, and
- Create environmental, social and economic benefits from waste and secondary materials management





## Local Drivers

- 2.14 The South London Waste Plan is driven by the need of the boroughs to meet their 2019 ItP London Plan targets and apportionments and the sustainable development aim to provide enough waste capacity to manage the waste the area generates.
- 2.15 To this end, in December 2018, the four boroughs commissioned waste planning consultants Anthesis to undertake a study of the boroughs' existing capacity and likely future capacity. From this evidence, the following preferred strategy has been identified:
- Safeguard existing, operational waste sites
  - Encourage the intensification of appropriate sites to meet any shortfall
  - Not plan for other waste streams as either the waste stream is so small as to be insignificant or the capacity is sufficient already

## The Sustainability Appraisal

2.16 This plan is accompanied by a Sustainability Appraisal. The purpose of a Sustainability Appraisal is to evaluate development policies and proposals through the integration of social, environmental and economic considerations during the preparation of the planning documents. The South London Waste Plan boroughs have already produced a Scoping Report, setting out the sustainability issues and how they will be evaluated, and a Sustainability Appraisal on the South London Waste Plan Issues and Preferred Options document has also been carried out. The Sustainability Appraisal with this plan also forms part of the consultation.

## Equalities Impact Assessment

2.17 The plan has also been subject to an Equalities Impact Assessment to ensure the South London Waste Plan does not adversely affect members of socially excluded or vulnerable groups and to meet the partner boroughs' statutory duties.

## Duty to Cooperate

2.18 The Localism Act 2011 (Section 110) prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must "maximise the effectiveness" of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on waste issues, particularly cross-boundary issues. This process has been undertaken as part of the preparation for this South London Waste Plan and is an ongoing process.







## Key Issues

- 3.1 Like the South London Waste Plan 2012, the development of the replacement South London Waste Plan must be informed by an up-to-date and proportionate analysis of the context of the plan area and the key issues and challenges facing it.
- 3.2 A full description of the partner boroughs' characteristics is available in the accompanying Sustainability Appraisal report. The SA includes an analysis of population demographics, employment, social deprivation and the provision of transport networks. It identifies the location of the boroughs' conservation areas, nature conservation areas and protected open space as well as areas at risk of flooding. These are all important factors when considering suitable locations for waste management facilities. The Sustainability Appraisal has been produced alongside the South London Waste Plan and has influenced the Plan's production.
- 3.3 Evidence supporting the South London Waste Plan has been produced by the consultancy Anthesis on behalf of the four boroughs. The draft South London Waste Plan Technical Report 2019 sets out key data on waste issues in south London and analyses it in the context of national policy, the published London Plan 2016 and the emerging draft London Plan 2017-2019. The SLWP Technical Report 2019 is available on line. published alongside this consultation.
- 3.4 From local evidence, national and London's policy on waste, five key issues have been identified for the draft South London Waste Plan 2021-2036 to address.

## Key Issue 1 Cross Boundary Issues

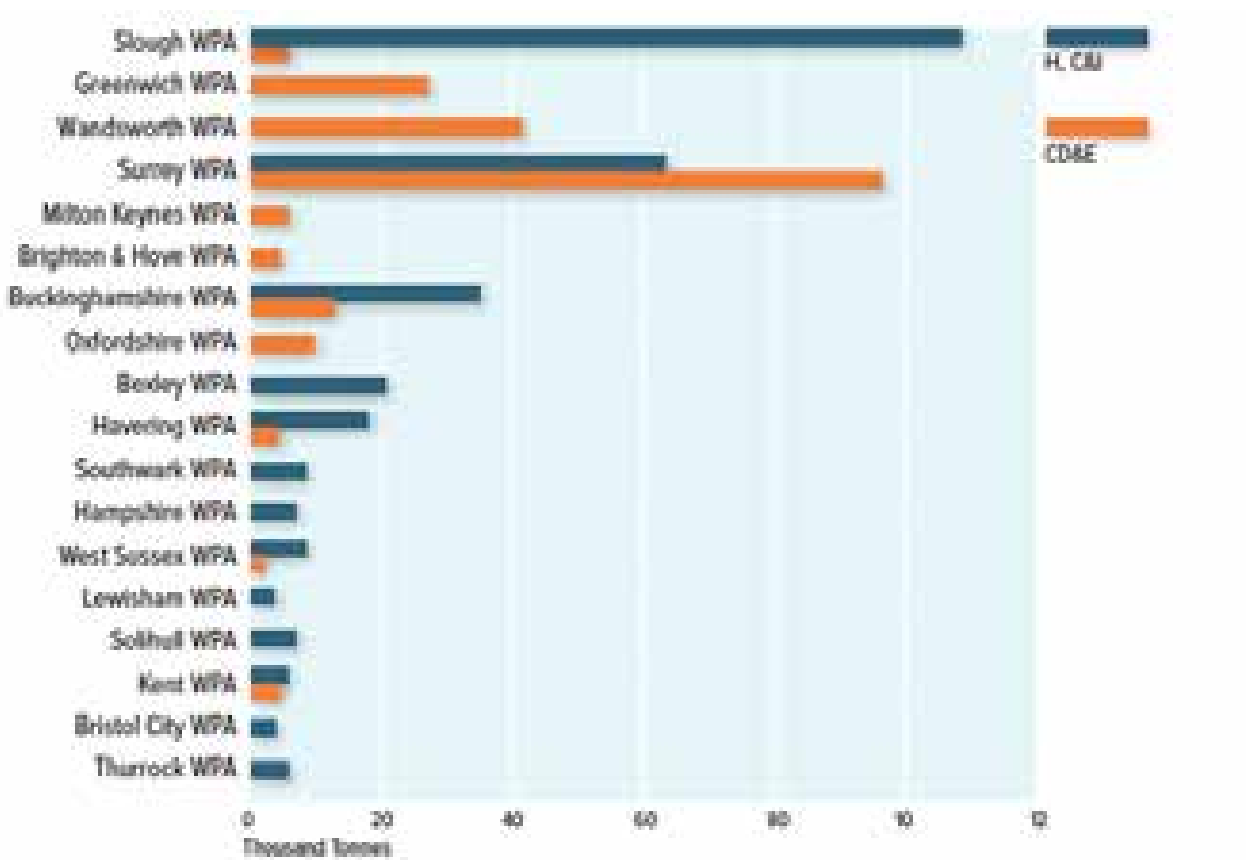
- 3.5 Waste is a strategic cross-boundary issue. Authorities have a legal "duty to co-operate" under the Localism Act to ensure that authorities work together on strategic issues such as plan-making for waste.





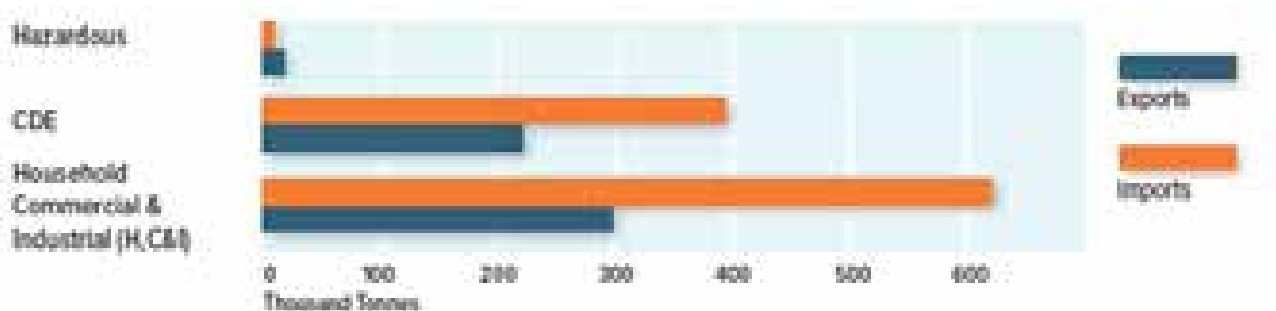
- 3.6 The Mayor’s London Plan considers waste arising from households, businesses and other sources within London’s boundaries and apportions an amount of this waste for each London borough to manage. However, different types of waste are managed in different facilities which often need a wide catchment to be economically viable so to achieve net self-sufficiency every area will have some waste imports and exports.
- 3.7 The South London Waste Plan Technical Report 2019 sets out in detail the last five years of exports and imports between the South London Waste Plan boroughs and other waste authorities.

Figure 2 South London Waste Plan Exports (tonnes) of Household, Commercial and Industrial (H, C&I) and Construction & Demolition (CD&E) Waste in 2017



- 3.8 The Technical Report Table 44 demonstrates that in 2017 approximately 300,000 tonnes of household and commercial and industrial waste was exported to be managed in other waste authorities. The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes.

Figure 3 South London Waste Plan Imports and Exports of Waste Streams in 2017 (tonnes)



3.9 Although it initially appears from the data that the South London Waste Plan area is a net importer of waste, most of the imported waste tonnage for both household/commercial and industrial waste (89%) and construction, demolition and excavation waste (77%) is not attributed to specific Waste Planning Authorities. Some of this waste is likely to have been generated within the South London Waste Plan boroughs themselves.

Figure 4 Origin of South London Waste Plan Imports of Household, Commercial & Industrial Waste (HC&I) in 2017 (tonnage percentage)

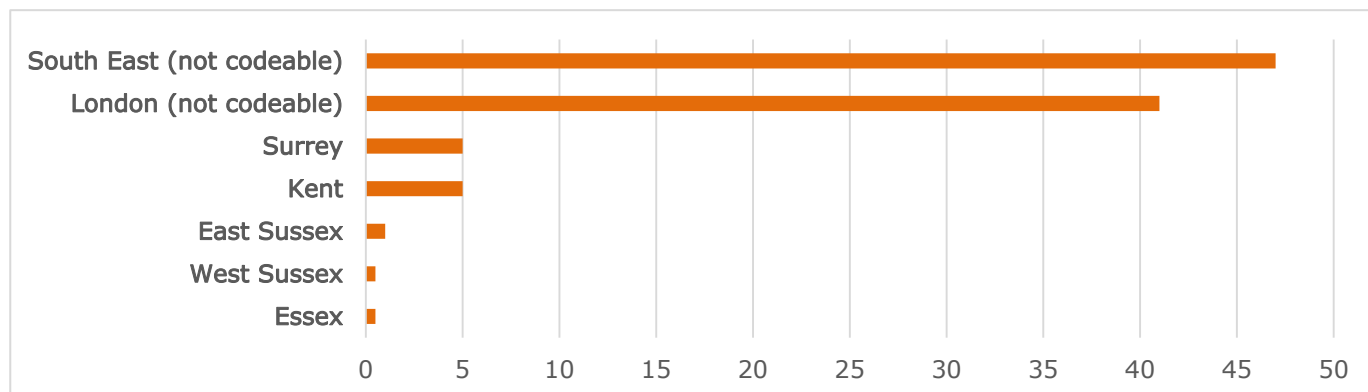
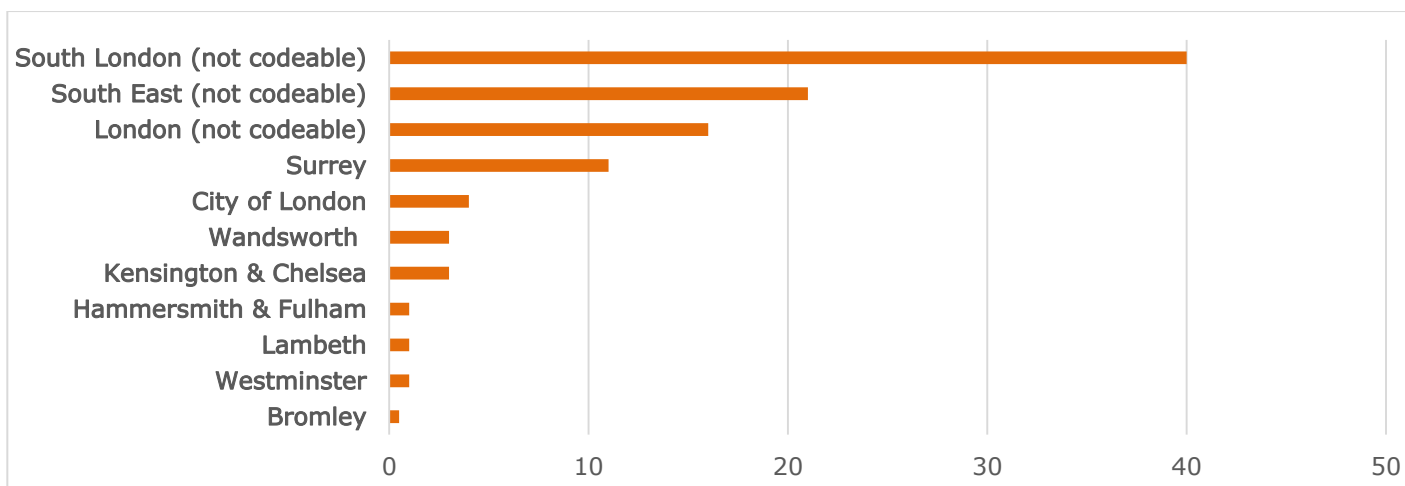
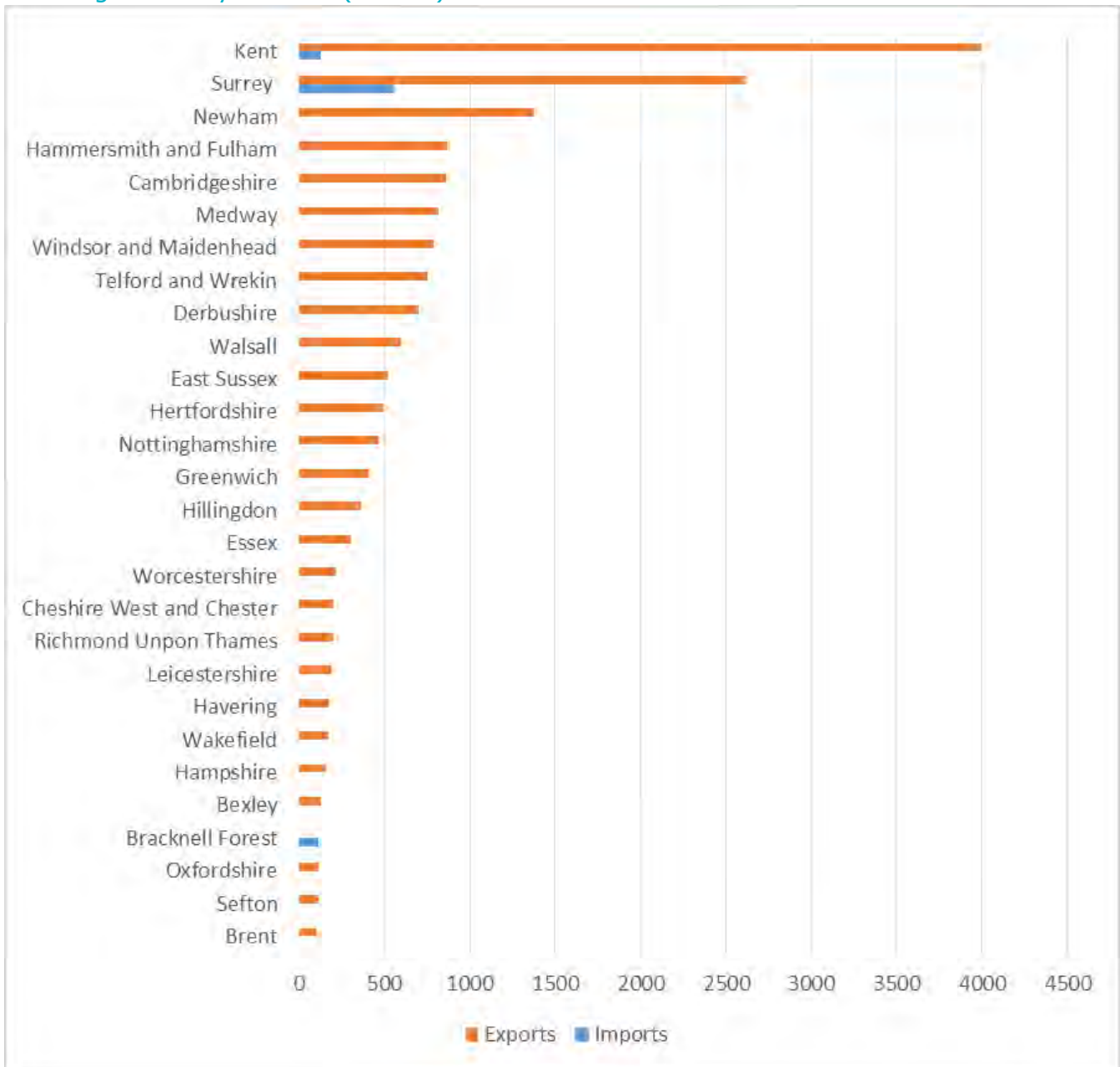


Figure 5 Origin of South London Waste Plan Imports of Construction, Demolition & Excavation Waste C, D&E in 2017 (tonnage percentage)



3.10 Hazardous waste, such as from healthcare, oil, solvents and other building materials, requires specialist facilities for treatment and disposal so may travel further than other types of waste as there are fewer and more dispersed specialist facilities required to deal with the lower tonnages. South London is a net exporter of hazardous waste; in 2017 the South London Waste Plan area exported 20,200 tonnes and imported 800 tonnes.

Figure 6 South London Waste Plan Imports and Exports of Hazardous Waste by Waste Planning Authority in 2017 (tonnes)

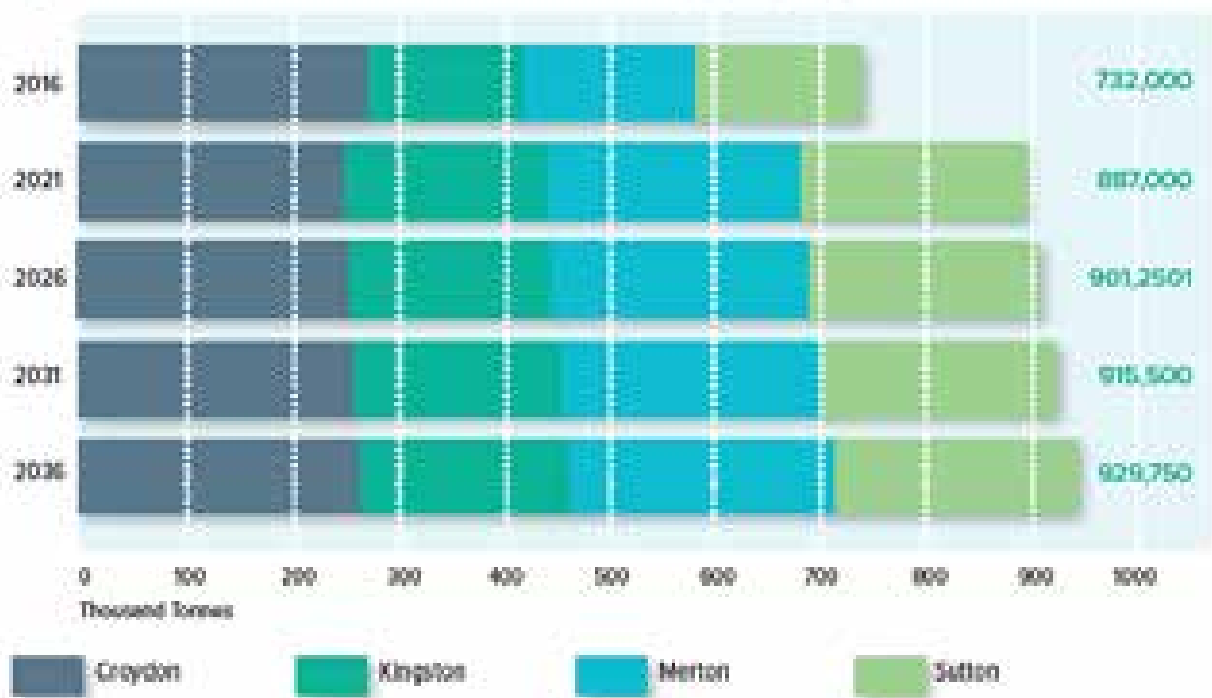


3.11 The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities which receive South London waste are able to do so into the future. The achievement of this task can be seen in the Statements of Cooperation which accompany this plan.

## Key Issue 2 How much waste must the South London Waste Plan plan for?

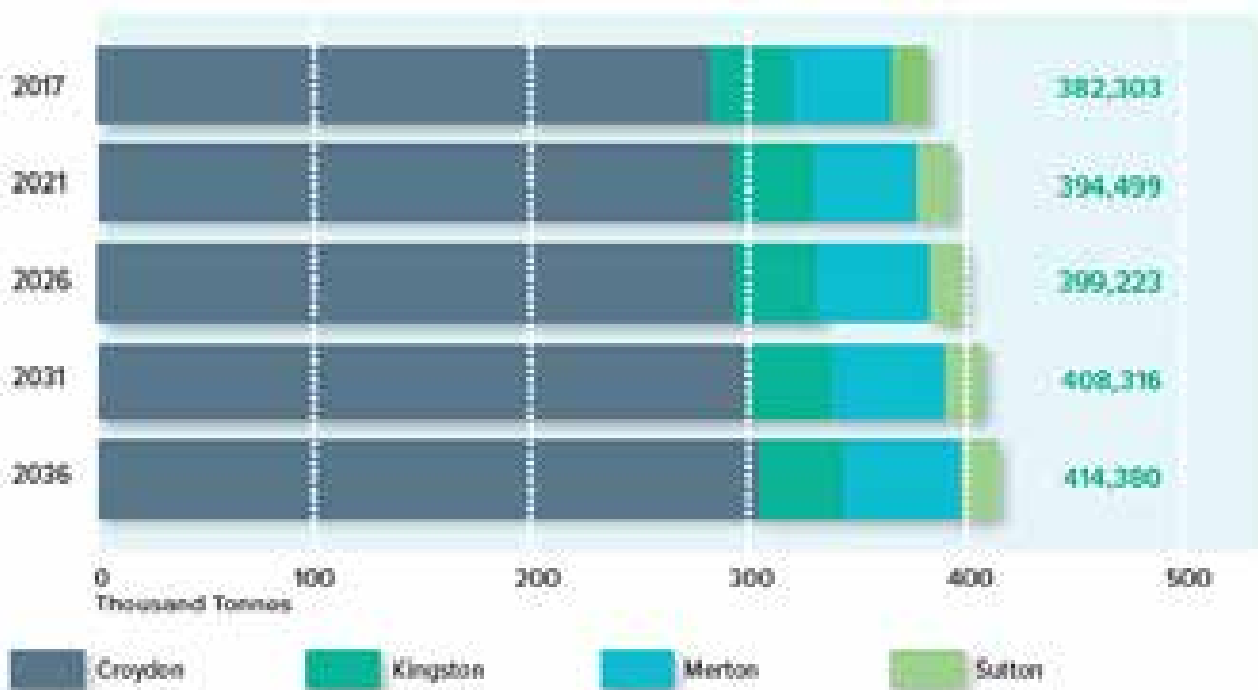
- 3.12 The National Planning Policy for Waste and the associated guidance requires waste planning authorities to plan for seven waste streams:
- 3.13 **Local Authority Collected Waste (LACW)**, also known as municipal or household waste: Waste collected by a Local Authority, including recycling, household and trade waste.
- 3.14 **Commercial/industrial**: non-hazardous waste produced by shops, businesses and industry.
- 3.15 These two waste streams are collectively the largest amount of waste produced in the South London Waste Plan area; both make up the 2019 ItP London Plan apportionment targets. Most of the boroughs within the South London Waste Plan area have been set apportionment targets higher than their anticipated waste arisings and collectively the apportionment is higher than the anticipated arisings. The 2019 South London Waste Plan Technical Report has therefore used the higher 2019 ItP London Plan apportionment targets for each South London Waste Plan authority as a more accurate and up-to-date target of what has to be planned for. As set out in Figure 7 below, the South London Waste Plan boroughs must plan for facilities to manage a target of 929,750 tonnes of apportioned waste (Local Authority Collected Waste and Commercial and Industrial Waste) by 2036.

Figure 7 Household, Commercial & Industrial Waste Targets (tonnes)



3.16 **Construction, Demolition & Excavation:** soil, concrete, brick, plastic, wood and other waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures. This is the third largest waste stream and the amount of waste produced each year is highly influenced in London by the strength or weakness of London’s housebuilding and commercial property development market. The London Plan sets a target that London will recycle and re-use 95% of Construction and Demolition Waste by 2020. The London Plan excludes excavation from the net self-sufficiency target as it is difficult to recycle this waste stream in a London context. The South London Waste Plan Technical Report 2019, chapter 4, sets out how the overall Construction and Demolition Waste arisings in the South London Waste Plan area has been forecast using GLA’s employment figures in the construction sector until 2036. By 2036 a total of 414,380 tonnes of Construction and Demolition waste should be managed in the South London Waste Plan area.

Figure 8 Construction and Demolition Waste Targets (tonnes)



3.17 **Other Waste Streams:** The other waste streams which the Government requires to be planned for are: Hazardous waste, Low Level Radioactive waste, Agricultural waste and Wastewater. However, as the text for Policy WP2 explains, there are either satisfactory arrangements in place, the waste stream is so small as to be insignificant or capacity improvements have already been made.

3.18 The task for the South London Waste Plan boroughs was to provide sufficient capacity for those waste streams which will need additional capacity to meet their 2036 target. This task has been achieved through Policies WP1, WP2 and WP3.



## Key Issue 3: Scarcity of Land

- 3.19 In south London, any requirement for waste facilities must be considered and balanced against the land needs of other land uses.
- 3.20 All South London Waste Plan boroughs are set to see a substantial increase in house-building following the adoption of the 2019 ItP London Plan. The four boroughs are expected to deliver 4,430 new homes per year – an increase of 55% on their previous target - and with new housing comes the associated schools, healthcare, jobs and businesses and recreational areas that are essential to support a functioning city, a good quality of life and the sustainable development required by the National Planning Policy Framework. South London is also well known for its green and open spaces. Croydon, Kingston and Sutton all have Green Belt, which has some of the highest levels of protection from development, and 33% of Merton is protected green space, such as Wimbledon and Mitcham Commons.
- 3.21 Besides a huge increase in demand for land for new homes and associated infrastructure and the protection of green and open spaces, south London is also in demand for industrial land. The 2017 London Industrial Land Demand Study (CAG Consultants for the GLA, Figure 13.3) identified that in the four boroughs the potential loss of industrial land was virtually negated by requirements for warehousing and other types of industry. The vacant land that was identified is necessary for churn and a functioning land market. In the context of scarce land, it is necessary to plan sufficiently for waste but not sterilise industrial land for other uses by applying waste designations too widely.
- 3.22 Over the past decade, the South London Waste Plan boroughs have worked together on the South London Waste Plan 2011-2021. During these ten years, sites for waste management have been delivered in accordance with the plan. Modern waste facilities are more efficient in their layout, processing capability and landtake. This means waste facilities take less industrial land than in recent years. The task for the South London Waste Plan boroughs was to provide sufficient management capacity for waste uses but ensure that they do not stifle other land uses with high land demand. This task has been achieved through policies WP1, WP2, WP3 and WP4.



## Key Issue 4: Waste Transfer Facilities



3.23 Given that the aim of the South London Waste Plan is to manage more waste within the plan's borders, thus supporting the Mayor of London's targets for greater self-sufficiency, and that logistics and travel is increasingly expensive, the need to transfer waste to facilities outside the plan area will change as more reuse, recycling and management facilities are developed. In practice, as set out in the South London Waste Plan Technical Report 2019 and based on Environment Agency data, most waste sites that operate mainly for the transfer of waste to other areas also have a waste management facility on-site, such as a bulking or materials recovery facility to assist with sorting and recycling.

3.24 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples include the transfer of hazardous waste to specialist treatment facilities in Cambridgeshire & Peterborough or the importation of household, commercial and industrial waste from Kent. Although the South London Waste Plan boroughs acknowledge that as much of their own waste as practicably possible should be managed within its boundaries, the South London Waste Plan should be sufficiently flexible to support transfer where waste cannot reasonably be treated within the plan area, or where the negative environmental impacts of doing so are greater than other options.

3.25 Transfer stations operated by waste management contractors tend to bulk collected wastes before transporting to other facilities for, for instance, landfilling, energy recovery or separation for recycling. As such this capacity does not count towards the London apportionment. However, many transfer stations do practice separation of recyclates from waste materials before they are bulked for onward transport. To properly recognise this additional recycling activity, the South London Waste Plan Technical Report 2019 has used Environment Agency data for five years to 2017 to produce an average recycling rate practiced within the waste transfer facility. The average recycling rate has then been counted towards the apportionment target and not as waste transfer. As the costs of materials and travel rise (particularly in London via initiatives such as the Ultra Low Emissions Zone expansion) this will further support the circular economy approach and result in a greater financial imperative to reduce waste and reuse waste materials.

3.26 The task for the South London Waste Plan boroughs was to encourage more reuse and recycling on waste transfer stations. This task has been achieved through Policy WP4.

## Key Issue 5: Climate Change, the End of Landfill and the Circular Economy

- 3.27 As started by the South London Waste Plan 2011, the South London Waste Plan will reduce the reliance on disposal to landfill sites both within the plan area and outside London. Therefore, this South London Waste Plan will:
- Not safeguard the Beddington Farmlands landfill site as it is due to close in 2023 and its waste will be managed higher up the waste hierarchy as other recovery rather than disposal
  - Seek to reduce the amount of Construction and Demolition Waste going to landfills in Surrey.
- 3.28 Tackling climate change is a key Government priority for the planning system and a driver for all South London Waste Plan boroughs. The South London Waste Plan boroughs are all focused on the challenges posed by climate change and are driven by the requirements to mitigate and adapt to the effects of climate change. While it is recognised that waste management facilities will continue to generate CO2 emissions, the 2019 ItP London Plan requires major development, such as new waste facilities, to be net zero carbon and this is a key issue for the South London Waste Plan.
- 3.29 The South London Waste Plan boroughs support the 2019 Mayor's Environment Strategy and 2020 ItP London Plan proposals to move towards a circular economy, to keep products and materials circulating within the economy at their highest value for as long as possible. Leasing, sharing, reusing, repairing and re-manufacturing products - from lawnmowers to window glass - has been identified as having a positive impact on businesses, jobs and the economy as well as reducing waste. London and other cities are prime locations for moving from a linear to a circular economy due to the expense and traffic pollution incurred in transferring goods. Activities are already taking place in South London boroughs to move towards a more circular economy and include the reuse of materials recovered from extensive building demolition that might previously have ended up as construction and demolition waste and the establishment of repair facilities, usually in vacant retail units rather than on waste sites themselves.
- 3.30 The tasks for the South London Waste Plan boroughs was to continue their work to reduce the amount of waste going to landfill, make major waste developments zero carbon, make minor waste developments as close to zero carbon as possible and finally provide opportunities for the circular economy to expand. This task has been achieved through policies WP3, WP6 and WP7.







## Vision and Objectives

4.1 The key issues identified in the previous chapter have informed the four South London Waste Plan boroughs' vision and objectives for the South London Waste Plan and these are set out below:

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met.

The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates.

- 4.2 To achieve this vision, the South London Waste Plan has the following objectives:
- **Objective 1:** Meet the 2019 ItP London Plan target for Household and Commercial and Industrial Waste
  - **Objective 2:** Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary
  - **Objective 3:** Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan
  - **Objective 4:** Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates
  - **Objective 5:** Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity
  - **Objective 6:** Ensure the effects of new development are mitigated and, where possible, enhance amenity







# WP1 Strategic Approach to Household and Commercial and Industrial Waste

## London Plan Arisings and Apportionment Targets

5.1 The boroughs’ targets for Household and Commercial and Industrial Waste are set by the Mayor of London and the boroughs are using the 2019 ItP London Plan waste arisings and apportionment targets as these are the most up-to-date targets. The Mayor calculates the amount of Household Waste produced by a borough as follows:



5.2 The amount of Commercial and Industrial Waste produced by a borough is calculated as follows:



5.3 However, the Mayor of London then redistributes portions of the borough arisings between boroughs, giving those boroughs he considers to have more scope to manage waste a higher waste management target (or apportionment) and those he considers has less scope to manage waste a lower waste management target. The Mayor used the following criteria for apportioning or redistributing waste between boroughs: existing waste facilities and industrial land, arisings in a borough, presence of railheads and wharves, proximity to major routes, restrictive land designations (such as heritage or biodiversity), flood risk and socio-economic factors.

5.4 The Mayor of London's arisings and apportionment targets for the South London Waste Plan boroughs are set out in Figure 11.

Figure 11 Arisings and Apportionment at 2021 and 2036 (tonnes per annum)

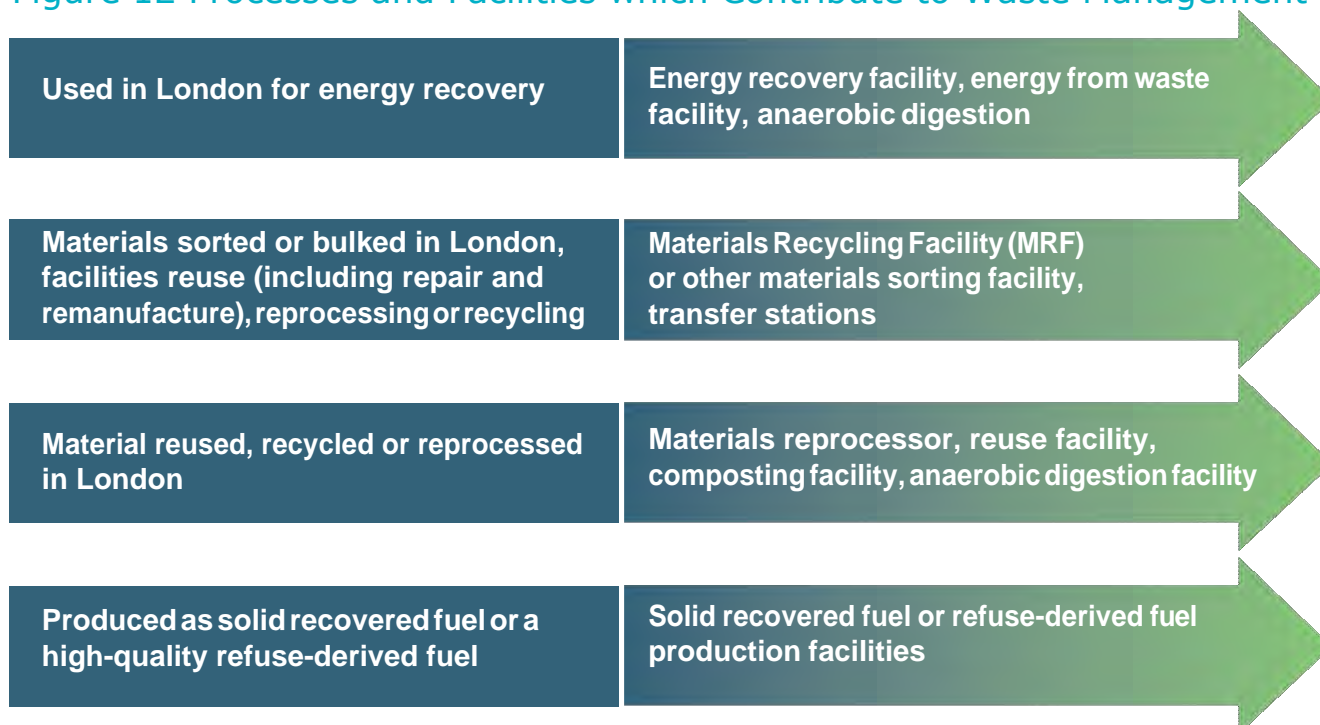
	2021		2036	
	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	320,000	264,000
Kingston	152,000	187,000	157,000	196,000
Merton	174,000	238,000	180,000	249,250
Sutton	161,000	211,000	168,000	220,500
<b>TOTAL</b>	<b>792,000</b>	<b>888,000</b>	<b>825,000</b>	<b>929,750</b>

5.5 In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generate.

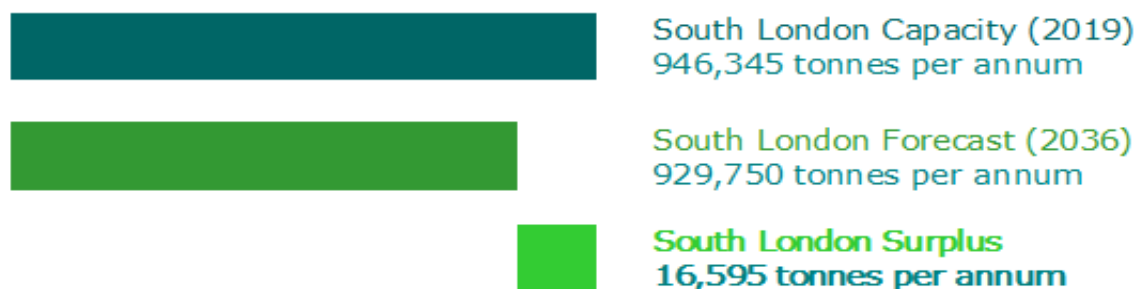
### Existing Capacity

5.6 Appendix 2 shows the existing capacity for waste management across the four South London Waste Plan boroughs. The figures have been calculated by Anthesis consultants for the four boroughs and what constitutes waste management and what sort of facilities provide waste management are set out in Figure 12.

Figure 12 Processes and Facilities which Contribute to Waste Management



**Figure 13 Capacity, Forecast and Surplus for Household and Commercial & Industrial Waste**



5.7 Appendix 2 also shows that the current existing capacity for Household and Commercial and Industrial Waste is sufficient to meet the Mayor's apportionment, with the figures reproduced in Figure 13.

### Approach to Meeting the Target

5.8 Since the four South London Waste Plan boroughs have sufficient waste management capacity to meet their 2036 target, it is proposed to safeguard the existing sites, which by virtue of having a planning permission and operating are available, viable and suitable, and allow the intensification of the existing sites where appropriate. Unlike the previous South London Waste Plan, the sufficient existing capacity means that the boroughs have no need to identify additional sites for waste management and no need to identify areas which may be suitable for waste management. As all the boroughs have a high demand in their industrial areas for other employment-generating uses, this is especially important for the South London Waste Plan boroughs. With industrial land in high demand, the South London Waste Plan boroughs do not want to be sterilising sites in industrial areas from other employment uses by unnecessarily designating waste sites.

5.9 Therefore, in accordance with Paragraph 3 of the National Planning Policy for Waste (which requires local authorities to plan for waste) the 2019 ItP London Plan apportionment targets and this plan's objectives:

#### WP1 Strategic Approach to Household and Commercial and Industrial Waste

- (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
- (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2019 ItP London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.
- (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).
- (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).




## WP2 Strategic Approach to Other Forms of Waste

5.10 In addition to Household and Commercial and Industrial Waste, the Planning Practice Guidance (Paragraph 013 Reference ID: 28-013-20141016) also requires local authorities to plan for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.

### Construction and Demolition Waste

5.11 Construction and Demolition Waste is mainly made up of soils, stone, concrete, brick and tile although other waste, such as wood, metals, plastic and cardboard can be found in the waste stream as well. The data regarding Construction and Demolition Waste is poor. Arisings are calculated by employment forecasts for the construction industry, which can be highly susceptible to fluctuations as a result of the health or otherwise of the regional and national economy. Capacity is also difficult to measure as it is suspected that a lot of the recycling or reuse of Construction and Demolition waste takes place on the construction site itself or at waste management facilities with exemptions from Environment Agency permits. Nevertheless, consultants Anthesis have produced a forecast of Construction and Demolition Waste for the South London Waste Plan boroughs and this is set out in Figure 14.

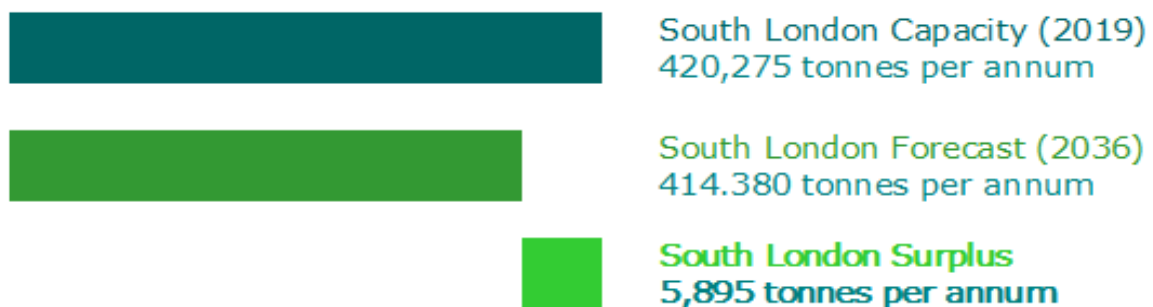
Figure 14 Construction and Demolition Waste Arisings and at 2021 and 2036 (tonnes per annum)



	2021 Arisings	2036 Arisings
Croydon	292,970	304,695
Kingston	37,887	39,040
Merton	47,975	54,038
Sutton	15,667	16,607
<b>TOTAL</b>	<b>394,499</b>	<b>414,380</b>

5.12 Appendix 2 shows the existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and it shows there is a small surplus for the 2036 forecast. The exact figures are set out in Figure 15.

Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste





- 5.13 The South London Waste Plan boroughs consider that there is considerable scope for the intensification of Construction and Demolition sites and those with potential for intensification are set out in the sites section of the document and Appendix 2.

### Excavation Waste

- 5.14 Excavation waste is defined as “naturally occurring soil, stone, rock and similar materials (whether clean or contaminated) as a result of site preparation activities” (Survey of Arisings and Use of Alternatives to Primary Aggregates in England: C, D&E Waste, DCLG, 2005). The 2019 ItP London Plan does not expect the capital to be net self-sufficient in excavation waste as “the particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision to apply net self-sufficiency to this waste stream” (paragraph 9.8.1). Instead, 2019 ItP London Plan expects 95% of excavation waste to go to beneficial use (see the Glossary for the definition of beneficial uses)
- 5.15 In practice, it is very difficult to plan for excavation waste as (1) sites come and go as they develop a need for excavation waste and then are filled, for example the Chessington Equestrian Centre in Kingston; (2) landfill come on and off stream as they are filled; (3) increased construction and demolition waste recycling means less construction and demolition waste going to landfill and so landfills are filling more slowly; (4) increased economic activity leads to greater excavation waste and landfills filling more quickly.
- 5.16 The South East Planning Advisory Group’s Joint Position Statement on the Deposit of Land in the South East of England (2019) states: “the export of such waste [from London] for management within the South East will continue for the foreseeable future [and] inert waste arising on London can be used to restore mineral workings in the South East of England.” Therefore, the South London Waste Plan boroughs do not intend to make provision for such waste but would support an appropriate temporary site within the South London Waste Plan area for excavation waste should a proposal arise.





### Low Level Radioactive Waste

5.17 Low Level Radioactive Waste commonly occurs in paper, plastics and scrap metal that have been used in hospitals, research establishments and the nuclear industry. There are currently no specific facilities for processing such waste within the South London Waste Plan area. Within the area, there are 10 organisations with permits to keep and use radioactive facilities. According to the Pollution Inventory Dataset (2017), only seven are active in the keeping and using of Low Level Radioactive Waste and all are hospitals or medical research establishments. Most Low Level Radioactive Waste is in the form of dust which can be washed off and therefore, these hospitals and research establishments have permits to discharge small amounts of permitted radioactive wastewater to the sewer. There are no solid transfers of this type of waste in any of the facilities. Therefore, this evidence places no requirement on the South London Waste Plan boroughs to provide for solid waste management infrastructure.

### Agricultural Waste


5.18 The Waste Data Interrogator identified that only 383 tonnes of agricultural waste was generated in the South London Waste Plan boroughs in 2017. Given the relatively small tonnage of this waste, the fact that it can be mixed with Commercial and Industrial Waste and Construction and Demolition Waste and that it is often dealt with by Commercial and Industrial and Construction and Demolition waste facilities, there is no need for the South London Waste Plan boroughs to provide for this waste stream.

### Hazardous Waste

5.19 Hazardous waste is categorised as waste which is harmful to human health either immediately or over a period of time. Typically, hazardous waste can include asbestos, chemicals, oil, electrical goods and healthcare waste. All hazardous waste has to be treated in specialist facilities and so often this waste may travel further than non-hazardous waste to reach the appropriate specialist facility. Figure 17 shows the hazardous waste arisings in the South London Waste Plan area, which are already counted within the commercial and industrial and construction and demolition waste streams. Therefore, in terms of

tonnage, this waste stream has already been accounted for in the household, commercial and industrial and construction and demolition totals but its requirement for specialist facilities has not. Given that the waste generation in South London is small, its projected increase is small, its tonnage is already accounted for and that the small quantity of waste is already being managed by identified specialist facilities, there is no requirement on the South London Waste Plan boroughs to provide any hazardous waste treatment facilities.

Figure 16 Hazardous Waste Arisings at 2021 and 2036 (tonnes per annum)




	2021 Arisings	2036 Arisings
Croydon	9,008	9,193
Kingston	2,404	2,432
Merton	4,591	4,685
Sutton	5,239	5,303
<b>TOTAL</b>	<b>21,242</b>	<b>21,612</b>

**Wastewater**

5.20 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and manages the sewerage infrastructure as well as the sewage treatment works. Figure 18 shows Thames Water’s relatively small projected increase in wastewater treatment and sludge volume between 2020 and 2035.

Figure 17 Wastewater and Sludge Generation at 2020 and 2035



	2020		2035	
	Wastewater treated (m <sup>3</sup> /year)	Sludge (total dissolved solids/year)	Wastewater treated (m <sup>3</sup> /year)	Sludge (total dissolved solids/year)
Croydon	11,79,642	6,309	11,570,942	6,552
Kingston	10,938,459	5,429	11,378,691	5,666
Merton	9,657,944	5,685	10,240,412	6,059
Sutton	21,113,960	11,547	22,545,500	12,366
<b>TOTAL</b>	<b>52,890,205</b>	<b>28,970</b>	<b>55,735,545</b>	<b>30,643</b>

- 5.21 The four boroughs are served by Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works. Thames Water has informed the South London Waste Plan boroughs that these works all have adequate capacity to manage the incoming sewage and have all had major capacity increases recently. Between 2020 and 2025, Thames Water plans general capital maintenance projects and, specifically at the Hogsmill Sewage Treatment Works, biodiversity enhancements and a replacement to the combined heat and power plant.
- 5.22 Therefore, in accordance with national planning practice guidance, the 2019 ItP London Plan and this plan's objectives:



## WP2 Strategic Approach to Other Forms of Waste

- (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
- (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the forecast arisings for Construction and Demolition waste of managing 420,275 tonnes per annum within their boundaries across the plan period to 2036. The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3)
- (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5
- (d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.
- (e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.



## WP3 Safeguarding of Existing Waste Sites

### Safeguarding

5.23 In order to preserve the existing capacity, the South London Waste Plan boroughs will safeguard all the existing waste sites, set out on Pages 44-91, for waste uses and these will be shown on the boroughs' Policies Map.

### Intensification on Safeguarded Sites

5.24 In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site.

However, this will have to be considered against all the relevant policies in a borough's Development Plan. For example, while a redevelopment to increase capacity may be desirable in terms of meeting the target, it may not be desirable with regard to the additional strain that is placed on the local road network. Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the policies in a borough's Development Plan.



### Compensatory Provision

5.25 The 2019 ItP London Plan states "waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used, where this is not available potential capacity of the site should be appropriately assessed" (paragraph 9.9.2). The evidence base supporting the economic policies in the 2019 ItP London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses. Due to this the evidence also indicates that Croydon, Kingston and Merton should not release industrial land and that Sutton should provide more industrial capacity. As South London is already providing 13% more waste management capacity than waste arising in the south London area, the South London Boroughs have to carefully consider the balance of demand for further waste uses with the demand for other business and industrial enterprises to ensure a diverse and robust business base.



## Waste Hierarchy

5.26 Planning Practice Guidance (Paragraph: 009 Reference ID: 28-009-20141016) states that “driving waste up the Waste Hierarchy is an integral part of the national waste management plan for England and national planning policy for waste. All local planning authorities must have regard to the Plan and national policy in preparing their Local Plans.” In other words, this entails ensuring waste that can be recycled is not used as fuel, ensuring waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of a waste facility means waste operations cannot easily rise up the waste hierarchy by intensification.

5.27 Therefore, in accordance with this plan’s objectives:



### WP3 Existing Waste Sites

#### Safeguarding

(a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.

#### Intensification

(b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough’s Development Plan.

#### Safeguarding Compensatory Provision

(c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.

(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.

#### Safeguarding Waste Hierarchy

(e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.

## WP4 Sites for Compensatory Provision

5.28 As set out in Policy WP1, the South London Waste Plan expects no new sites for waste use except where they are required for compensatory provision. The location of compensatory sites must be carefully considered.

5.29 Policy SI18 of the 2019 ItP London Plan suggests that Strategic Industrial Locations and Locally Significant Industrial Locations are suitable locations, while Appendix B of the National Planning Policy for Waste (October 2014) provides further information on locational criteria for waste treatment facilities.



5.30 Therefore, in accordance with the National Planning Policy for Waste, the 2019 ItP London Plan and this plan's objectives:

### WP4 Sites for Compensatory Provision

Proposals for new waste sites to provide compensatory provision should:

- (a) Demonstrate that the site is capable of providing sufficient compensatory capacity.
- (b) Be located on sites:
  - (i) within Strategic Industrial Locations or Locally Significant Industrial Locations;
  - (ii) not having an adverse effect on nature conservation areas protected by international or national regulations;
  - (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,
  - (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.
- (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;
- (d) Have particular regard to sites which:
  - (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land);
  - (ii) are located more than 100 metres from open space;
  - (iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
  - (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;
  - (v) have direct access to the strategic road network;
  - (vi) have no Public Rights of Way crossing the site;
  - (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views;
  - (viii) offer opportunities to accommodate various related facilities on a single site;
- (e) Include appropriate mitigation measures which will be considered in assessing site suitability;
- (f) Meet the other policies of the relevant borough's Development Plan.



## WP5 Protecting and Enhancing Amenity

- 5.31 Waste facilities have the potential to generate a large number of amenity issues especially in an area as diverse as the plan area which includes urban, suburban and semi-rural built environments. The issues include effects on the built and historic environment, encroachment into open space, flood risk, harm to biodiversity, water quality and unacceptable emissions into the air (both from the plant itself and the traffic movements generated), unacceptable noise and vibration (both from the plant and traffic), litter and vermin and bird population increase.
- 5.32 Waste developments should be well designed and managed to ensure that amenity impacts can be mitigated or prevented. These may be addressed on an ongoing basis through conditions imposed by planning permissions that are granted by planning authorities and environmental permits that are regulated by the Environment Agency. The National Planning Policy for Waste (Paragraph 7) directs waste planning authorities to “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced”
- 5.33 The National Planning Policy Guidance (Paragraph: 050 Reference ID: 28-050-20141016) advises planning authorities that “before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body.” Consequently, in the consideration of waste facility applications, each borough will seek advice from the Environment Agency and other agencies as appropriate. In addition, developers are encouraged to contact the appropriate partner borough, the Environment Agency and Natural England prior to submission of an application to discuss all relevant matters and to engage in early public consultation on a proposal.
- 5.34 Waste developments should be designed paying particular attention to how the design of a facility can enhance the local environment and mitigate amenity issues. For instance, waste activities should be within a fully enclosed and covered building and the impact may be further limited by considering setting, hard and soft landscaping, height, bulk and massing, detailing, materials, lighting and boundary treatments.
- 5.35 Therefore, in accordance with the National Planning Policy for Waste and this plan’s objectives:

### WP5 Protecting and Enhancing Amenity

- (a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.
- (b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.
- (c) Particular regard will be paid to the impact of the development in terms of:
- (i) The Green Belt, Metropolitan Open Land, recreation land or similar;
  - (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
  - (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
  - (iv) Groundwater, surface water and watercourses;
  - (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;
  - (vi) Noise and vibration from the plant and traffic generated;
  - (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;
  - (viii) The safety and security of the site
  - (ix) Odour, litter, vermin and birds; and,
  - (x) The design of the waste facility, particularly:
    - complementing or improving the character of an area;
    - limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
    - being of a scale, massing or height appropriate to the townscape or landscape;
    - using good quality materials;
    - minimising the requirement for exterior lighting; and,
    - utilising high-quality boundary treatments.

The information in the schedule below will provide the basis for the assessment of the impact of a development.





### Schedule: Information which may be required for a planning application

- 1 Type(s) of waste to be managed at the site, e.g. CD&E and C&I.
- 2 Estimated annual throughput of each type of waste materials and timescale of operations for the current proposals and the estimated maximum capacities for the site, if different.
- 3 Estimated capacity of the site
- 4 Method of working. The annual throughput per treatment method, e.g. Transfer, MRF, AD.
- 5 Markets to be served
- 6 Present use, conditions and ground levels of the site and its surroundings.
- 7 Site layout, means of access, the design and siting of buildings and fixed and mobile machinery to be used
- 8 Hours of operation
- 9 Statement of Community Involvement
- 10 Preliminary BREEAM and/or CEEQUAL assessment, a commitment to submit a design stage certificate before construction can start on site and to undertake a post-construction review
- 11 Energy Assessment, including an assessment of energy demand and CO2 emissions
- 12 Assessment of the impact of the proposed development on the built and historic environment
- 13 Archaeological evaluation
- 14 Landscape assessment and landscaping proposals, including screening, landscaping works and boundary treatments
- 15 Tree Survey/Arboricultural Report
- 16 Biodiversity Assessment would be required where proposals are likely to affect nature conservation areas such as a: National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Metropolitan, Borough or Local Importance for Nature Conservation, or Green Corridors.
- 17 Topographical Survey
- 18 Geological Assessment
- 19 Hydrological and hydrogeological assessment
- 20 Flood Risk Assessment
- 21 Site drainage details







- 22 Air Quality Impact Assessment, demonstrating the effects on air quality in the locality of a proposed site arising from the operation of the site and vehicles movements to and from it.
- 23 An assessment identifying nuisances (eg odours, dust and fumes) likely to affect nearby receptors and which identifies the mitigation measures to be used to minimise the effects of those nuisances.
- 24 Noise Impact Assessment
- 25 Sustainability Statement
- 26 Circular Economy Statement
- 27 Job creation details, including skills, training and apprentice opportunities
- 28 TV and Radio Reception Impact Assessment
- 29 Measures to prevent new or increased risk to aviation from the proposed development
- 30 Measures for protecting Public Rights of Way
- 31 Transport Assessment
- 32 Travel Plan
- 32 Route Management Strategy
- 33 Access Strategy
- 34 Delivery Servicing Plan/Freight Plan
- 35 Construction Logistics Plan
- 36 Highway safety measures
- 37 Design and Access Statement
- 38 Restoration, after care, after use and long-term management provision
- 39 An Environmental Impact Assessment may also be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 40 A Habitats Regulations Assessment, if the relevant borough and Natural England consider it may affect a European-designated site. European sites which may be affected are:
  - The Richmond Park SAC
  - The Wimbledon Common SAC
  - The Mole Gap to Reigate Escarpment SAC
  - The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA)
- 41 Any other requirements from the relevant borough's Validation List

## WP6 Sustainable Design and Construction of Waste Facilities

- 5.36 A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation. "Designing Waste Facilities - A Guide to Modern Design in Waste" (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy S12 of the 2019 ItP London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change.
- 5.37 In terms of standards, the Building Research Establishment (BRE) has two standards for rating the overall environmental and sustainability performance of non-residential developments: (1) BREEAM for non-residential buildings; and (2) CEEQUAL for infrastructure projects. In both cases, developments are rated: Outstanding, Excellent, Very Good, Good, Pass and Unclassified. Developers should consider their development and choose the most appropriate standard(s) for their proposed development or whether both are required. If developers use BREEAM, there is no specific scheme for waste facilities, in which developers should liaise with the BRE to identify a suitable 'bespoke' BREEAM scheme to suit the particular characteristics of the proposed development. If developers use CEEQUAL, they should be able to use the general CEEQUAL assessment. In both standards, a rating of Excellent should be achievable.
- 5.38 The reduction of carbon emissions is a key element of both schemes and, in this respect, the 2019 ItP London Plan sets out that all major developments should be net zero carbon, including a minimum on-site reduction of at least 35% beyond building regulations 2013 (or equivalent).
- 5.39 Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities - A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise:
- **Odours.** With temperature increases, waste will need to be treated more quickly and unenclosed waste facilities will become particularly vulnerable to odour issues.
  - **Heating, Cooling and Energy Use.** Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and minimising of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly.
  - **Flood Readiness.** Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas.
  - **Soil Subsidence.** The wetting and drying effect on soil may cause subsidence. Developers may need to consider deeper foundations or piling. Root barriers may be required depending on surrounding vegetation.
  - **Property Damage.** Higher wind speeds leading to structural damage, more intense rain leading to water infiltration and higher peak temperatures leading to blistering, warping and softening may affect the design of a building and the choice of materials.



- 5.40 In the construction phase of any development, consideration should be given to recycling Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. However, the boroughs are aware that this is not always feasible.
- 5.41 Therefore in accordance with national and regional advice, the 2019 ItP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:

#### WP6 Sustainable Construction and Design of Waste Facilities

- (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies of the relevant borough's Development Plan.
- (b) Waste facilities will be required to:
- (i) minimise on-site carbon dioxide emissions in line with 2019 ItP London Plan Policy SI2;
  - (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2019 ItP London Plan Policy GG6 , particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;
  - (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with 2019 ItP London Plan Policy G5;
  - (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;
  - (v) minimise waste and promote sustainable management of construction waste on site; and,
  - (vi) protect, manage and enhance local habitats and biodiversity.

## WP7 The Benefits of Waste

5.42 The 2008 Climate Change Act (as amended) sets a target to make the UK net zero carbon by 2050. In addition to societal changes, waste facilities have a major role to play in achieving the target and can contribute to the circular economy.

### Reuse, Refurbishment, Recycling and By-products

5.43 Therefore, the South London Waste Plan boroughs will encourage waste treatment applications that can lead to a prolonged product life (reuse and refurbishment), can provide secondary materials (remanufacture) or produce by-products, such as biogas from composting and refuse derived fuel and providing cooling, heat and power.

### Energy from Waste

5.44 In the London Environment Strategy (Objective 7.4), the Mayor of London states that “achieving reduction and recycling targets will mean that no new energy from waste facilities in London will be needed.” Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted.

### Job Creation and Social Value

5.45 Although the South London Waste Plan boroughs have relatively high employment rates overall, there are pockets of the four boroughs where employment is lower. The intensification of existing waste sites provides an opportunity for increased employment, often within a low employment hotspot. Therefore, the South London Waste Plan boroughs would welcome information on how the intensification may generate additional employment.

5.46 Therefore, in accordance with the 2019 ItP London Plan, London Environment Strategy and this plan’s objectives:

### WP7 The Benefits of Waste

- (a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.
- (b) Waste development for additional Energy from Waste facilities will not be supported
- (c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.





## WP8 Nearby New Development Affecting Waste Sites

- 5.47 All existing waste sites have strict controls imposed on them whether it be through planning conditions or the Environment Agency permitting regime. However, as an industrial activity, they have the potential to do some harm to sensitive land uses located near to them. Consequently, there is the issue of who has the responsibility of mitigating the impact of nuisances: The existing waste site or a new, proposed sensitive land use, such as residential development.
- 5.48 The National Planning Policy Framework (para 182) and the 2019 ItP London Plan (Policy D13) make it clear that where the operation of an existing business could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or agent of change) should be required to provide suitable mitigation before the completion of the new development.
- 5.49 In the South London Waste Plan area, the conflict between existing waste sites and a proposed, new sensitive land use is unlikely to occur because the existing waste sites are generally in industrial areas and are surrounded by non-sensitive land uses. Nevertheless, the South London Waste Plan boroughs consider, for clarity, a policy setting out who is responsible for the mitigation of any conflict is required.
- 5.50 Therefore, in accordance with the National Planning Policy Framework, the 2019 ItP London Plan and this plan's objectives:

### WP8 New Development Affecting Waste Sites

- (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.
- (b) Where new development is proposed that may be affected by an existing waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:
  - (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision
  - (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations





## WP9 Planning Obligations

- 5.51 Planning Obligations, or Section 106 agreements, are legal agreements negotiated between local authorities and developers or unilateral undertakings made by developers. The use of planning obligations will be in line with the prevailing legislation and guidance and the policies of the relevant borough.
- 5.52 In all cases, the boroughs in the plan area will try to use a planning condition to make a proposed development acceptable before resorting to a planning obligation. However, there may be situations where the use of planning conditions is not possible. The following are examples of where a planning obligation may be considered:
- Traffic management measures, including the routing of vehicles; supporting staff to travel sustainably; improving road safety; reducing freight traffic, particularly at peak times
  - Access and highway improvements
  - Provision of infrastructure, including low carbon and decentralised energy networks
  - Carbon offsetting contributions
  - Protection of sites of international, national, regional or local importance
  - Environmental enhancement
  - Flood risk compensation works
  - Archaeological investigation, recording and keeping of artefacts and safeguarding of remains
  - Off-site monitoring of emissions and the water environment
  - Provision and management of off-site or advance planting and screening
  - Job brokerage, training and skills to encourage local employment opportunities.
- 5.53 In addition, dependent on the relevant borough's Community Infrastructure Levy (CIL) Charging Schedule, a waste development may be CIL-liable.



### WP9 Planning Obligations

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.

## WP10 Monitoring and Contingencies

- 5.54 The South London Waste Plan boroughs recognize that on-going plan monitoring and review are essential to:
- delivering the objectives of the plan
  - assessing the implementation of the strategic policies
  - analysing the effectiveness of policies
- 5.55 In order to ensure plan monitoring is carried out comprehensively, the South London Waste Plan boroughs have created a Monitoring and Contingency Table (Appendix 1) which will measure the progress being made in meeting the strategic objectives. The reporting of the indicators and targets in the Monitoring and Contingencies Table will take place through the London Borough of Sutton's Authority Monitoring Report which is produced annually.
- 5.56 In order to ensure the South London Waste Plan is flexible and can deal with changing circumstances, the boroughs have identified a number of possible risks and constraints to delivery and have set out contingency plans to address these risks. Monitoring will provide the basis on which a contingency within the South London Waste Plan would be triggered. In any event, Paragraph 33 of the National Planning Policy Framework requires that the plan is reviewed every five years.

### WP10 Monitoring and Contingencies

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.







## How to read the information on Safeguarded Sites

**Site size:** in hectares

**Type of facility:** usually derived from the type of permit granted. There are three types of waste facilities: **(i)** a waste management facility, which reuses, recycles or reprocesses waste and therefore its throughput can count towards the south London target; **(ii)** a waste transfer facility, which processes or sorts waste for management elsewhere. In practice, however, most transfer stations do some management and, where this management capacity is known, it is counted towards the south London target; **(iii)** a waste treatment facility is a general term covering both waste management and waste transfer facilities

**Type of waste accepted:** from the following types: **(i)** household, **(ii)** commercial and industrial, **(iii)** local authority collected waste, usually a combination of household and commercial and industrial, **(iv)** construction and demolition, **(v)** excavation, **(vi)** wastewater, or **(vii)** hazardous (eg asbestos, chemicals, oil, electrical goods and some types of healthcare waste)

**Maximum throughput (in tonnes per annum):** The maximum throughput achieved by the site in any one year between 2013 and 2017. The 2019 ItP London Plan recommends that boroughs should use this measure to assess capacity

**Licensed capacity (in tonnes per annum):** The maximum capacity for the site from its Environment Agency permit. This is not a reliable guide to capacity as permitted capacities are based on capacity bands into which permits are divided rather than the operating annual capacity of the site, and, therefore, the capacity detailed in the licence tends to be at the top end of the charging bands. Therefore, many sites give permitted capacities of 74,999 tonnes, 24,999 tonnes and 4,999 tonnes and it is likely that such figures used are over estimates of actual operational capacities.

**Qualifying throughput (in tonnes per annum):** This is the element of the maximum throughput which counts as waste management. For it to count as waste management, it must be applicable to one of the London Plan criteria for waste management: **(i)** used in London for energy recovery; **(ii)** materials sorted or bulked in London facilities for reuse, reprocessing or recycling; **(iii)** materials reused, recycled or reprocessed in London; **(iv)** produced as a solid-recovered fuel or a high-quality refuse-derived fuel

**Site Description:** A description of the site and its immediate surroundings

**Planning Designations:** The principal and relevant designations covering the site from the relevant borough's Policies Map

**Currently Safeguarded:** If a site was safeguarded in the 2011 South London Waste Plan

**Opportunity to increase waste managed:** Whether the site has the scope to increase its capacity to manage waste. This may come from increasing throughput through the reconfiguration of the site. It does not include switching from non-waste management activities (such as sorting) to waste management activities (such as recycling).

**Issue to consider if there is a further application:** The principal issues facing the site if it is redeveloped for additional or a different type of waste treatment. This is unlikely to be the case in most instances. Appendix 1 shows the sites which have been assessed as being able to intensify.

### C1 Able Waste Services, 43 Imperial Way, Croydon CR0 4RR



Site size (ha)	0.45
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	46,463
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	43,268 (C&D)

Not to Scale

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**Site Description** Two-storey office block fronting Imperial Way with modern double-height warehouse to rear. The site lies within the Imperial Way Industrial Estate which comprises a mix of new and 1970s warehouses, mostly two-storey.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank.
- Providing appropriate soft landscaping and regard to the adjacent Roundshaw Park
- Conserving, and where possible enhancing, the setting of Airport House, a Grade II\* Listed building opposite



## C4 Days Aggregates Purley Depot, Approach Road, Croydon CR8 2AL



Sitesize (ha)	2.0
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	179,300
Licensed capacity (tpa)	249,999
Qualifying throughput (tpa)	178,593

Not to Scale

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**Site Description** Rail depot, including railway sidings, aggregates storing, construction and demolition waste recycling plant, concrete batching plant, ancillary office building and enclosed sheds.  
The site lies adjacent to Purley rail station and is reasonably isolated from nearby properties

**Planning Designations** Archaeological Priority Area  
Place Specific Policy - Purley District Centre and environs (DM42.1)

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This is a dual-use site, with a minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – London to Brighton Road
  - Not harming biodiversity in the vicinity
  - Providing appropriate soft landscaping
  - Not prejudicing the minerals operations on site which are a complementary use

## C5A Factory Lane Waste Transfer Station, Factory Lane, Croydon CR0 3RL



Site size (ha)	1.2
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	19,736*
Licensed capacity (tpa)	200,000*
Qualifying throughput (tpa)	0

Not to Scale

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### Site Description

A large triple-storey building surrounded by hardstanding. The site is part of a larger industrial area.

The site wraps around a household reuse and recycling centre.

Active gas holders lie to the north-west of the site and power lines are overhead.

\* Maximum throughput and licensed capacity figures are for both sites C5A and C5B

### Planning Designations

Strategic Industrial Location  
Flood Zone 2

### Currently Safeguarded

Yes – Site reference in 2011 SLWP: 1

### Opportunity to increase waste managed

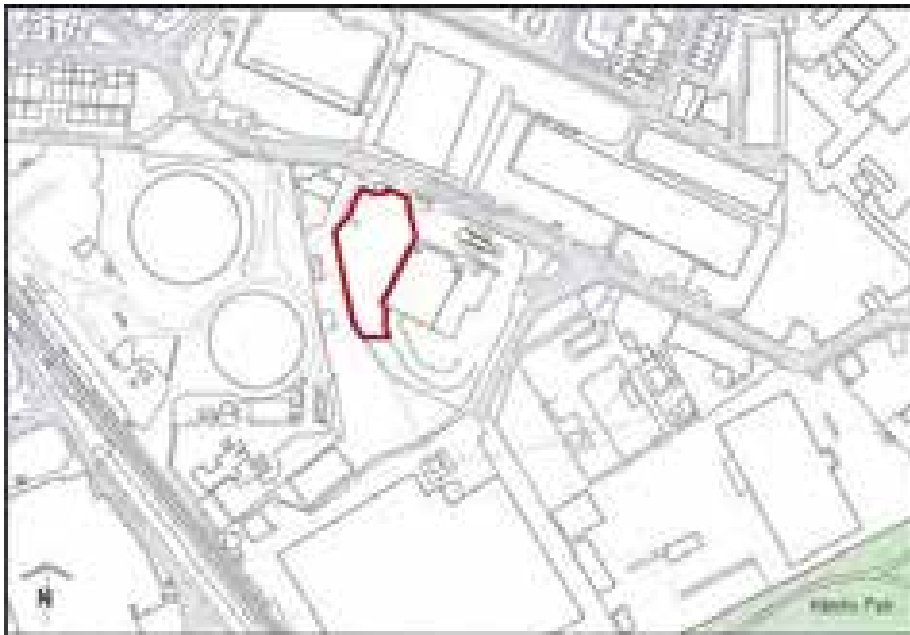
Yes. There are no plans by the South London Waste Partnership to intensify operations at this site. The site is large and there may be an opportunity to co-locate.

### Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any remains in the Ampere Way archaeology priority area
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

## C5B Factory Lane Reuse and Recycling Centre, Factory Lane, Croydon CR0 3RL



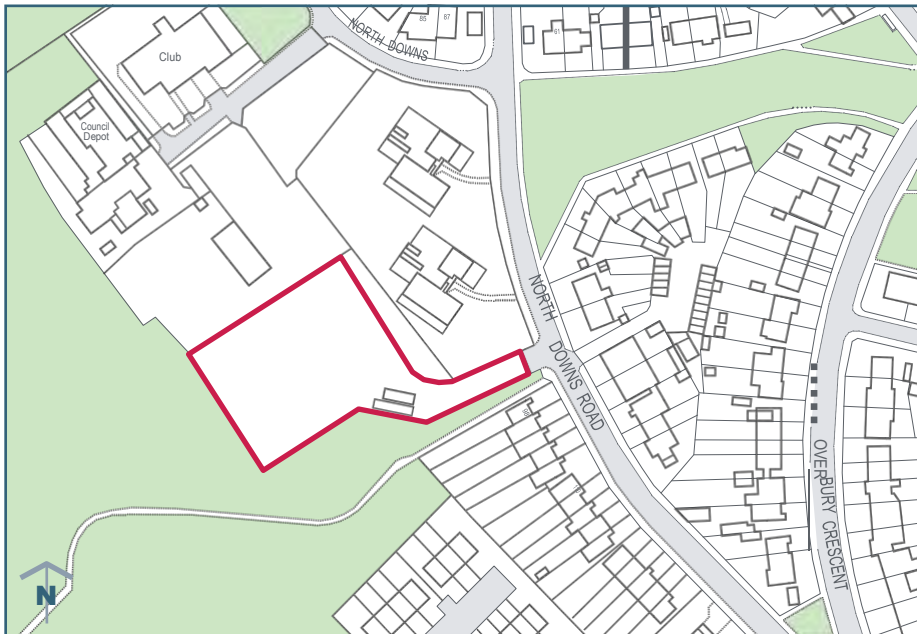
Site size (ha)	0.4
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	19,736*
Licensed capacity (tpa)	200,000*
Qualifying throughput (tpa)	9,623 (HCI) 5,206 (C&D)

Not to Scale

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Site Description	<p>Open local authority reuse and recycling centre. The site is part of a larger industrial area. A waste transfer site wraps around the household reuse and recycling centre. Active gas holders lie to the north-west of the site and power lines are overhead.</p> <p>* Maximum throughput and licensed capacity figures are for both sites C5A and C5B</p>
Planning Designations	<p>Strategic Industrial Location Flood Zone 2</p>
Currently Safeguarded	<p>Yes – Site reference in 2011 SLWP: 1</p>
Opportunity to increase waste managed	<p>Yes. There are no plans by the South London Waste Partnership to intensify operations at this site. While household reuse and recycling centres have a low throughput per hectare, the site is large and there may be an opportunity to co-locate.</p>
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any remains in the Ampere Way archaeology priority area</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> </ul>

## C6 Fishers Farm Reuse and Recycling Centre, North Downs Road, Croydon CR0 0LF



Site size (ha)	0.2
Type of facility	Household Waste Amenity Site
Type of Waste	Household, Commercial and Industrial (HCI )
Maximum throughput tonnes per annum (tpa)	6,895
Licensed capacity (tpa)	15,125
Qualifying throughput (tpa)	4,542(HCI)

Not to Scale

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Site Description	Open local authority household reuse and recycling centre Located on the edge of a residential area adjacent to farmland
Planning Designations	Archaeological Priority Area
Currently Safeguarded	Yes – Site Reference in SLWP 2011:
Opportunity to increase waste managed	No. There are no plans to intensify
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>• Designing the site so that operations are carried out within a fully enclosed building</li> <li>• Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>• Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>• Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>• Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area</li> <li>• Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Hutchinson’s Bank</li> <li>• Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>• Designing a facility that does not impact on the openness of Metropolitan Green Belt</li> <li>• Providing appropriate soft landscaping</li> </ul>

### C7 Henry Woods Waste Management, Land adjacent to Unit 9, Mill Lane Trading Estate, Croydon CR0 4AA



Site size (ha)	0.7
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	12,885
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** Open skip storage and waste sorting  
The site lies within an existing strategic industrial area.

**Planning Designations** Strategic Industrial Area  
Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This is a very constrained site with no opportunity for expansion or intensification

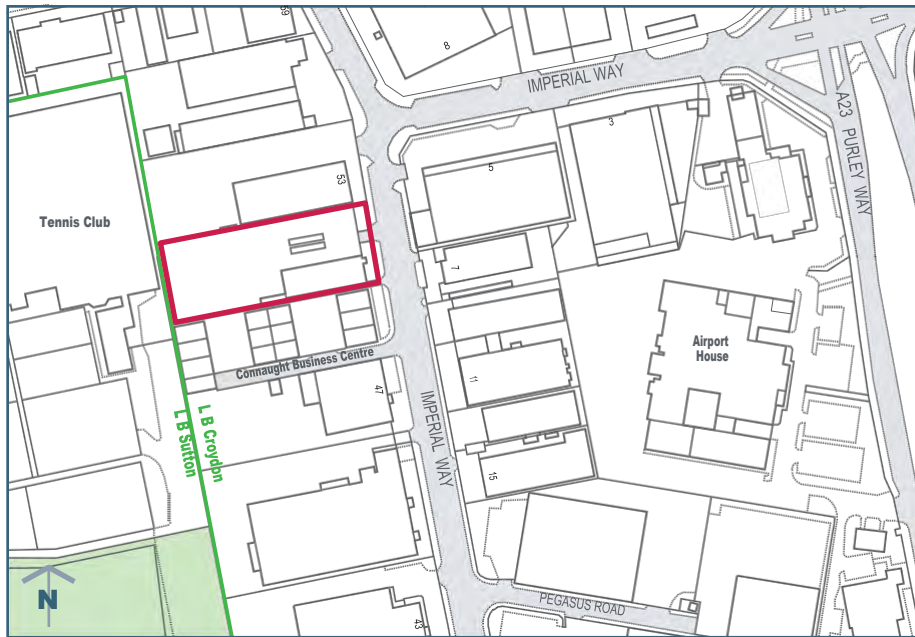
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected



## C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR



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Site size (ha)	0.4
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	4,213
Licensed capacity (tpa)	4,999
Qualifying throughput (tpa)	4,213 (HCI)

### Site Description

Modern double-height warehouse with adjacent hardstanding area for metal sorting  
The site lies within the Imperial Way Industrial Estate, which comprises a mix of new and mid-century warehouses, mostly double height.

### Planning Designations

Strategic Industrial Area  
Archaeological Priority Area

### Currently Safeguarded

No

### Opportunity to increase waste managed

No. This site is achieving near its permitted capacity so it is unlikely that there is an opportunity to intensify the site in its current form.

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Providing appropriate soft landscaping
  - Conserving, and where possible enhancing, the setting of Airport House, a Grade II\* Listed building opposite

## C9 Pear Tree Farm, Featherbed Lane, Croydon CR0 9AA



Not to Scale

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Site size (ha)	1.8
Type of facility	Waste Transfer Station
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	37,500
Licensed capacity (tpa)	37,500
Qualifying throughput (tpa)	0

**Site Description** Uncovered sorting facility, skip storage area along with vehicle storage and repair  
Site is within the Green Belt surrounded by farmland

**Planning Designations** Green Belt Archaeological Priority Area

**Currently Safeguarded** Yes - Site reference in SLWP 2011:5

**Opportunity to increase waste managed** No. This site is within the Green Belt and has been refused permission to intensify operations on several occasions on the basis of harm to the Green Belt and character and appearance of the area. Therefore this site is not suitable for intensification.

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the nearby open spaces
- Evaluating and preserving any archaeological remains as the site is in the archaeological priority area - Croydon Downs
- Minimising flood risk on- and off-site
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
- Designing a facility that does not impact on the openness of Metropolitan Green Belt
- Providing appropriate soft landscaping

## C10 Purley Oaks Reuse and Recycling Centre, Brighton Road, Croydon CR8 2BG



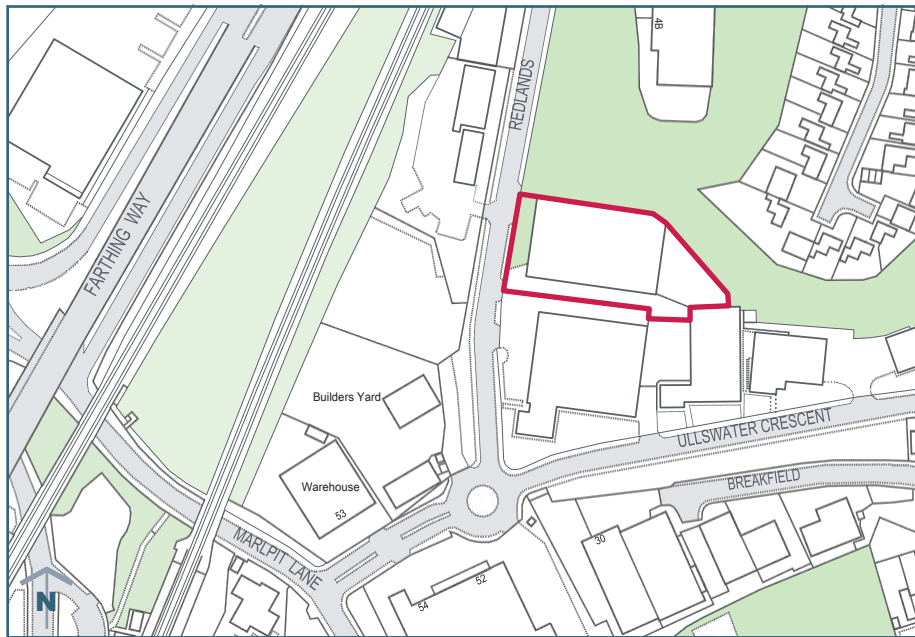
Not to Scale

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Site size (ha)	0.2
Type of facility	Household Waste Amenity Site
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	9,099
Licensed capacity (tpa)	12,535
Qualifying throughput (tpa)	6,684 (HCI)

Site Description	Open local authority reuse and recycling centre. Located within a local centre with nearby residential development.
Planning Designations	Place Specific Policy - Area of the junction of Brighton Road and Purley Downs Road (DM42.3) Archaeological Priority Area Flood Zone 3
Currently Safeguarded	Yes – Site reference in SLWP 2011: 4
Opportunity to increase waste managed	No. The site is adjacent to the proposed Site DM42.3 for a Gypsy and Traveller site so there is no capacity to expand
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Evaluating and preserving any archaeological remains in the archaeology priority area London to Brighton Roman Road</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Providing appropriate soft landscaping</li> <li>● The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018</li> </ul>

### C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon CR5 2HT



Site size (ha)	0.3
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	Not operational
Licensed capacity (tpa)	12,782
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** Large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear  
 The site lies within an industrial area with similar adjacent uses. To the east, there is a residential area with a buffer of green space and trees between.

**Planning Designations** Strategic Industrial Location

**Currently Safeguarded** Yes – Site reference in SLWP 2011: A

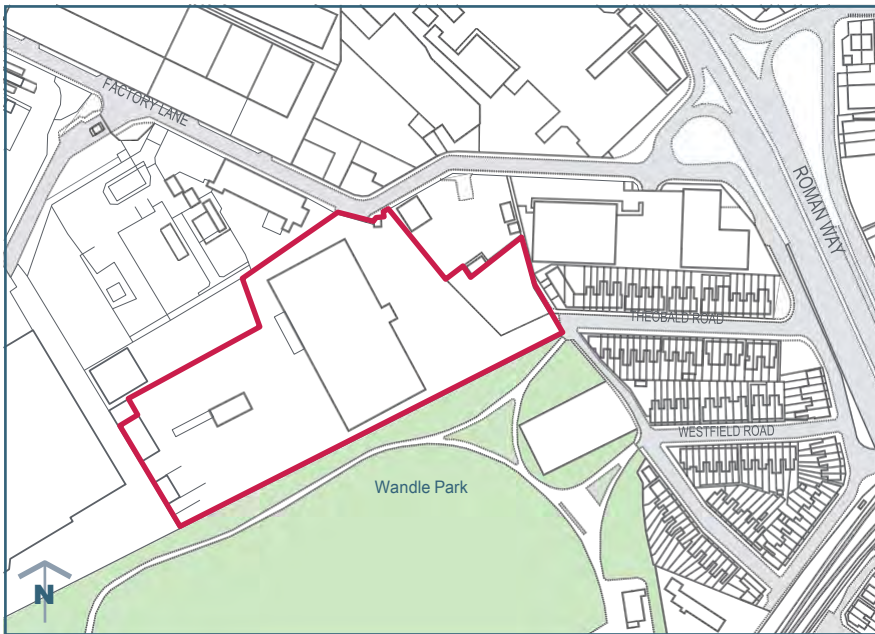
**Opportunity to increase waste managed** Yes. The site is currently vacant waste site and so there is an opportunity to add throughput to the apportionment total

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts



## C12 Stubbs Mead Depot, Factory Lane, Croydon CR0 3RL



Not to Scale

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Site size (ha)	2.7
Type of facility	Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	24,383
Licensed capacity (tpa)	Unknown
Qualifying throughput (tpa)	0

### Site Description

Large double-height shed with associated circulation. The site lies within an industrial area with similar adjacent uses. To the south, there is Wandle Park and to the east some residential properties are relatively nearby

### Planning Designations

Strategic Industrial Location  
Place Specific Policy – Site Allocations in Waddon (DM49.2)  
Flood Zones 2 and 3

### Currently Safeguarded

Yes – Site reference in SLWP 2011: B

### Opportunity to increase waste managed

Yes. The site had some throughput in the past but has not registered a return since 2015.

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Croydon Local Plan site allocation of the site (page 452)
  - Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Wandle Park
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected



### C13 Solo Wood, Factory Lane, Croydon CR0 3RL



Site size (ha)	.02
Type of facility	Wood Recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	Unknown
Licensed capacity (tpa)	5,000
Qualifying throughput (tpa)	5,000 (HCI)

Not to Scale

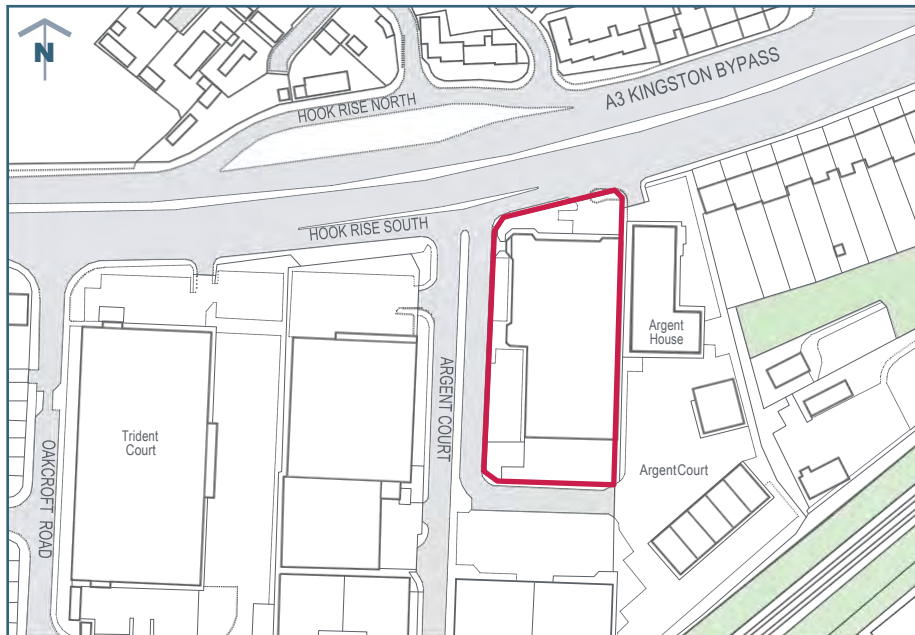
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**Site Description** Single-storey building and open storage. The site is part of a larger industrial area. A waste transfer site and a household reuse and recycling centre adjoins the site. Active gas holders lie to the north-west of the site and power lines are overhead.

<b>Planning Designations</b>	Strategic Industrial Location Flood Zone 2
<b>Currently Safeguarded</b>	Yes – Site reference in 2011 SLWP: 1
<b>Opportunity to increase waste managed</b>	No. The site is small and has little scope for intensification.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>• Designing the site so that operations are carried out within a fully enclosed building</li> <li>• Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>• Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>• Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>• Minimising flood risk on- and off-site</li> <li>• Evaluating and preserving any remains in the Ampere Way archaeology priority area</li> <li>• Not harming biodiversity in the vicinity</li> <li>• Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> </ul>



## K2 Genuine Solutions Group, Solutions House, Unit 1A, 223 Hook Rise South, Kingston KT6 7LD



Not to Scale

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Site size (ha)	0.3
Type of facility	Recycling and Reuse
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	1,630
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	1,630 (HCI)

**Site Description** Two-storey office block fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear  
 In an industrial area surrounded by similar large industrial sheds. Fronting onto Hook Rise South, beyond which is the Kingston bypass.

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This type of facility typically has a lower throughput per hectare, so it is unlikely that there is an opportunity to intensify operations at this site in its current form.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Tolworth Recreation Ground, King George’s Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Providing appropriate soft landscaping

### K3 Kingston Reuse and Recycling Centre, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Site size (ha)	0.7
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,363
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,392 (HCI)

Not to Scale

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**Site Description** Enclosed local authority reuse and recycling centre  
The site lies within an industrial area which is surrounded by open space. The Kingston Waste Transfer Station is within the same site.

**Planning Designations** Locally Significant Industrial Site Area of Archaeological Significance

**Currently Safeguarded** Yes. Site reference in SLWP 2011: 6

**Opportunity to increase waste managed** No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Providing appropriate soft landscaping

### K4 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Site size (ha)	1.3
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	68,883
Licensed capacity (tpa)	200,500
Qualifying throughput (tpa)	19,620 (HCI)

Not to Scale

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Site Description	Double-height enclosed shed with hardstanding for vehicles. The site lies within an industrial area which is surrounded by open space. The Kingston Civic Amenity Site is within the same site.	
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Planning Designations	Locally Significant Industrial Site	Area of Archaeological Significance
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Currently Safeguarded	No
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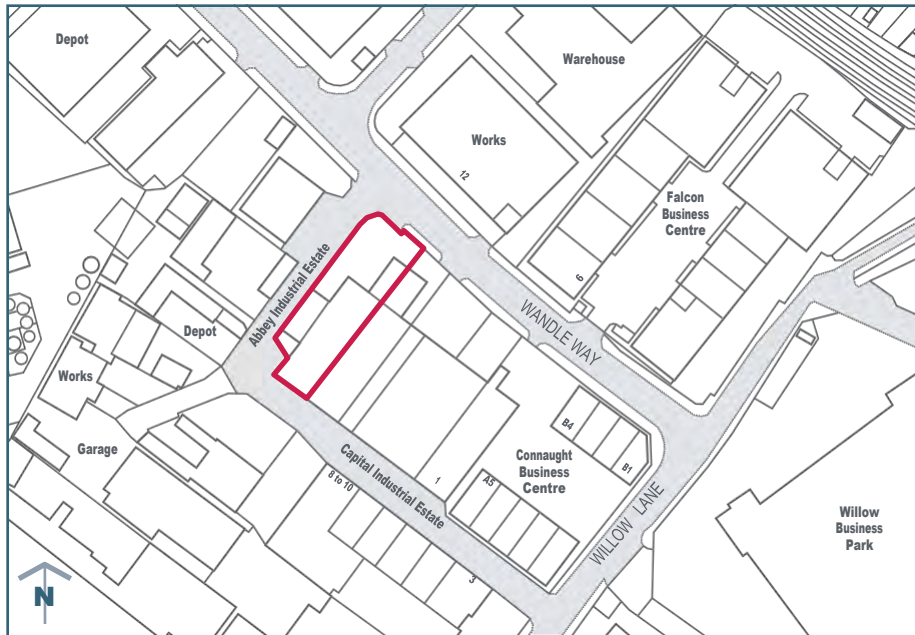
Opportunity to increase waste managed	No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.
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Issues to consider if there is a further application	Developers planning to intensify the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Open Land</li> <li>● Providing appropriate soft landscaping</li> </ul>
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### M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA



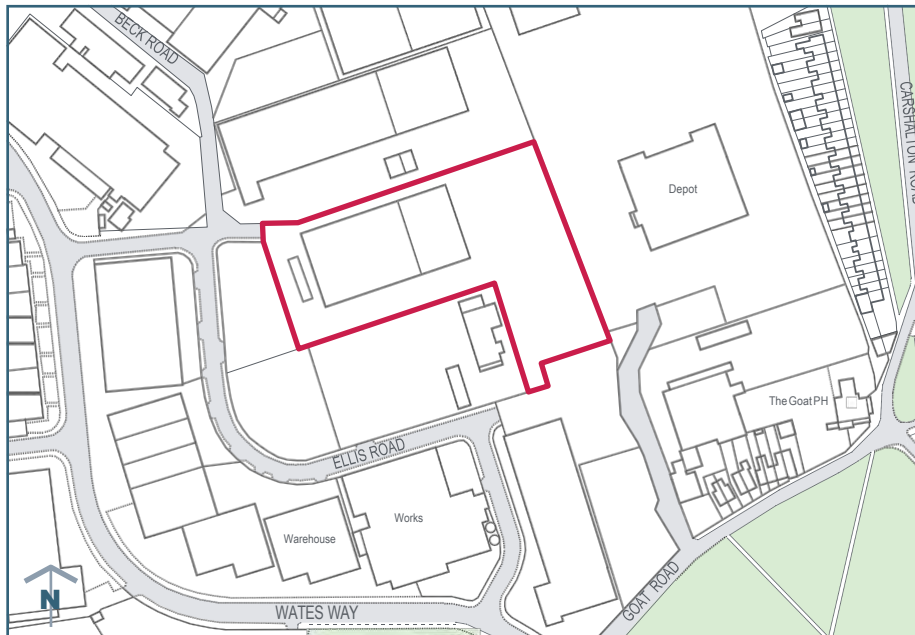
Site size (ha)	0.06
Type of waste	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	3,729
Licensed capacity (tpa)	5,000
Qualifying throughput (tpa)	0

Not to Scale

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<b>Site Description</b>	<p>Open area with skips</p> <p>Located within an industrial area and surrounded by similar two-storey sheds.</p> <p>Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site</p>
<b>Planning Designations</b>	<p>Strategic Industrial Location</p> <p>Archaeological Priority Zone</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Providing appropriate soft landscaping</li> <li>● Ensuring the safety clearances for the overhead power lines crossing the site are respected</li> </ul>

## M2 European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX



Site size (ha)	1.0
Type of facility	Metal recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	70,100
Licensed capacity (tpa)	109,500
Qualifying throughput (tpa)	70,100 (HCI)

Not to Scale

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### Site Description

A collection of large double-height warehouses and office space with hardstanding for metal sorting, vehicles and skips  
 Located within the Willow Lane industrial estate and surrounded by similar industrial properties.  
 Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north west of the site

### Planning Designations

Strategic Industrial Location  
 Archaeological Priority Zone  
 Flood Zone 2

### Currently Safeguarded

Yes. Site Reference in SLWP 2011: 22 (under name of B Nebbett & Son)

### Opportunity to increase waste managed

No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping
  - Ensuring the safety clearances for overhead power lines crossing the site are respected

### M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA



Site size (ha)	0.4
Type of facility	Paper sorting and baling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	5,000
Licensed capacity (tpa)	N/A
Qualifying throughput (tpa)	5,000 (HCI)

Not to Scale

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**Site Description** Hardstanding for material sorting, vehicles and skips. Two-storey portakabin office Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone  
Flood Zone 2

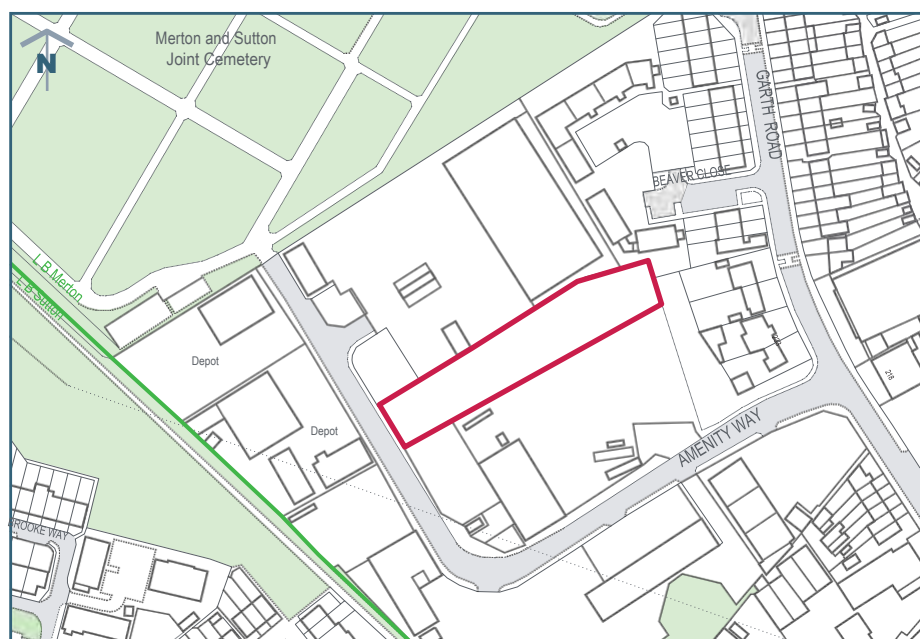
**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. There is a 2010 planning permission for metals recycling on this site with a throughput of 1,500 tonnes per week, which equates to 78,000 tonnes per annum. Therefore, there could be an opportunity to intensify throughput on the site with some intervention.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping



## M4 Garth Road Reuse and Recycling Centre, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.7 (including M5)
Type of facility	Household Waste Amenity Site
Type of waste	Local Authority Collected Waste
Maximum throughput tonnes per annum (tpa)	14,594
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,866 (HCI)

**Site Description** Open local authority reuse and recycling centre  
 The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

**Planning Designations** Locally Significant Industrial Location

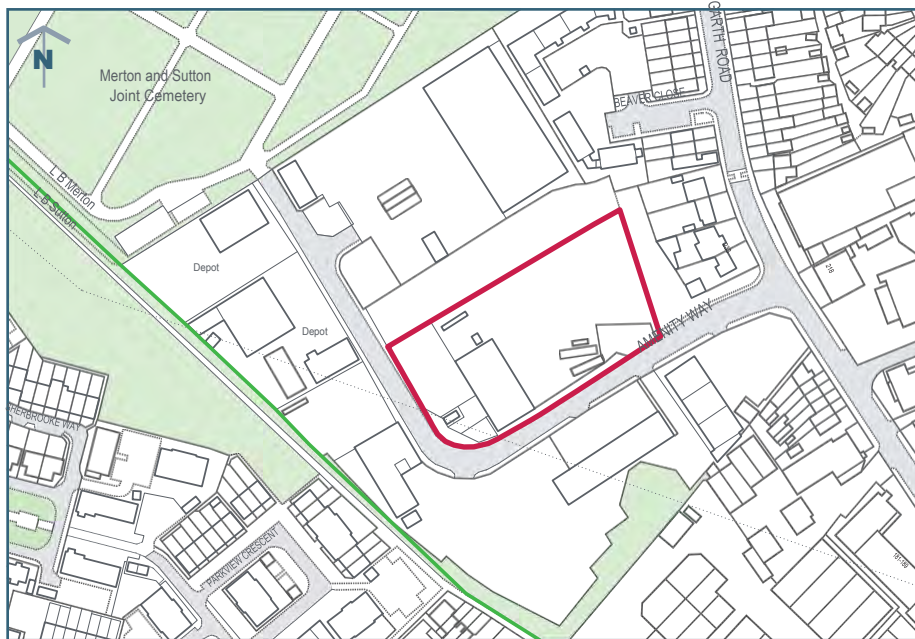
**Currently Safeguarded** Yes. Site Reference in SLWP 2011: 9

**Opportunity to increase waste managed** No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Providing appropriate soft landscaping



## M5 Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.45
Type of facility	Transfer Station
Type of waste	Local Authority, Collected Waste and Hazardous
Maximum throughput tonnes per annum (tpa)	18,839
Licensed capacity (tpa)	22,281
Qualifying throughput (tpa)	15,704 (HCI)

**Site Description** Transfer station  
 The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

**Planning Designations** Locally Significant Industrial Location

**Currently Safeguarded** Yes. Site Reference in SLWP 2011: 9

**Opportunity to increase waste managed** No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Providing appropriate soft landscaping
  - Ensuring the safety clearances for the overhead power lines crossing the site are respected

## M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA



Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste accepted	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	71,253
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** A large site comprising a double-height industrial shed with hardstanding for vehicles, skips and waste. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

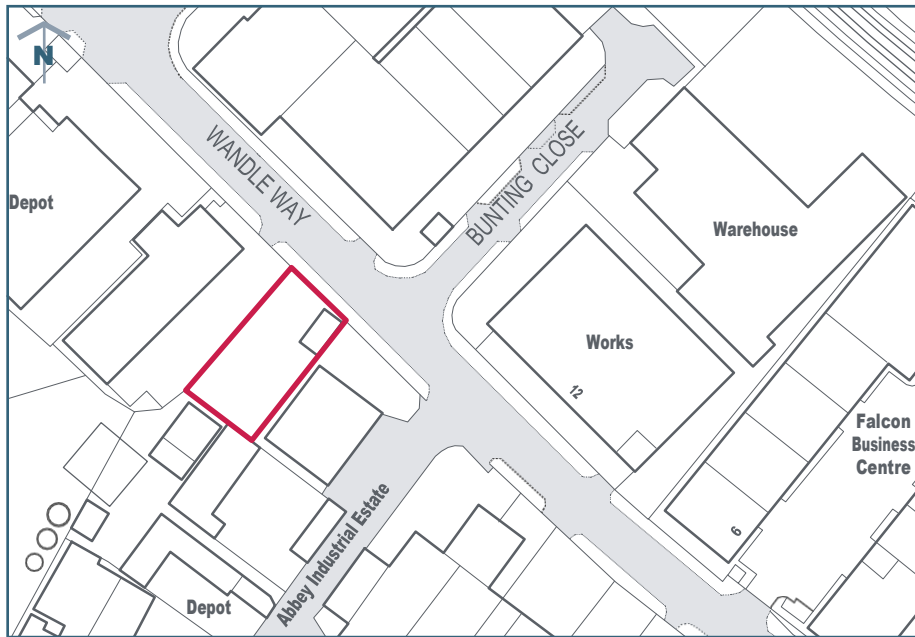
**Planning Designations** Strategic Industrial Location Archaeological Priority Zone Flood Zone 2

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

### M7 LMD Waste Management, Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA



Site size (ha)	0.06
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	24,999
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	20,774 (C&D)

Not to Scale

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**Site Description** Mainly open hardstanding for Construction and Demolition waste sorting. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded** No

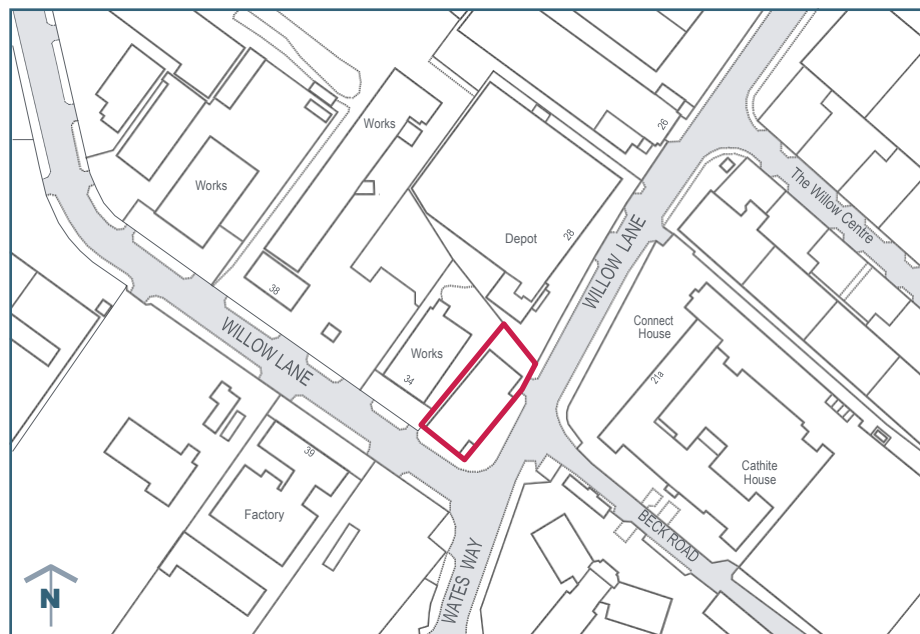
**Opportunity to increase waste managed** No. It is unlikely that there is an opportunity to intensify operations

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

## M8 LMD Waste Management, 32 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	38,738
Licensed capacity (tpa)	50,000
Qualifying throughput (tpa)	33,845 (C&D)

**Site Description** Double-height shed with attached single-storey offices  
 Located within the Willow Lane industrial estate and surrounded by similar industrial properties.  
 Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location opposite the site

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone  
 Flood Zone 2

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput ratio is above average for this type of facility

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping



## M9 Maguire Skips, Storage Yard, Wandle Way, Merton CR4 4NB



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	58,150
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description**      Mainly open hardstanding for skips and sorting. Double-height covered area. Located within the Willow Lane industrial estate and surrounded by similar industrial properties, however, there are residential properties approximately 20 metres to the north of the site

**Planning Designations**      Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded**      No

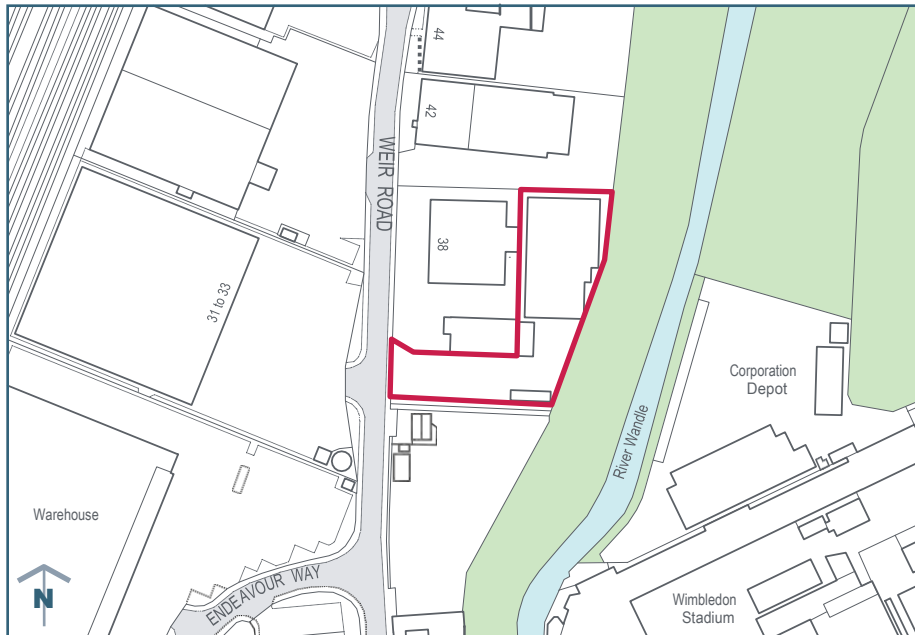
**Opportunity to increase waste managed**      No. The plot throughput ratio is above average for this type of facility so there are unlikely to be opportunities to intensify the throughput.

**Issues to consider if there is a further application**      Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Consulting Transport for London for any impacts on the London Trams Network



## M10 Powerday, Weir Court, 36 Weir Road, Merton SW19 8UG



Site size (ha)	0.3
Type of facility	Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	53,313
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	42,856 (C&D)

Not to Scale

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### Site Description

Enclosed double-height shed with outside hardstanding space  
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority one

**Currently Safeguarded** No

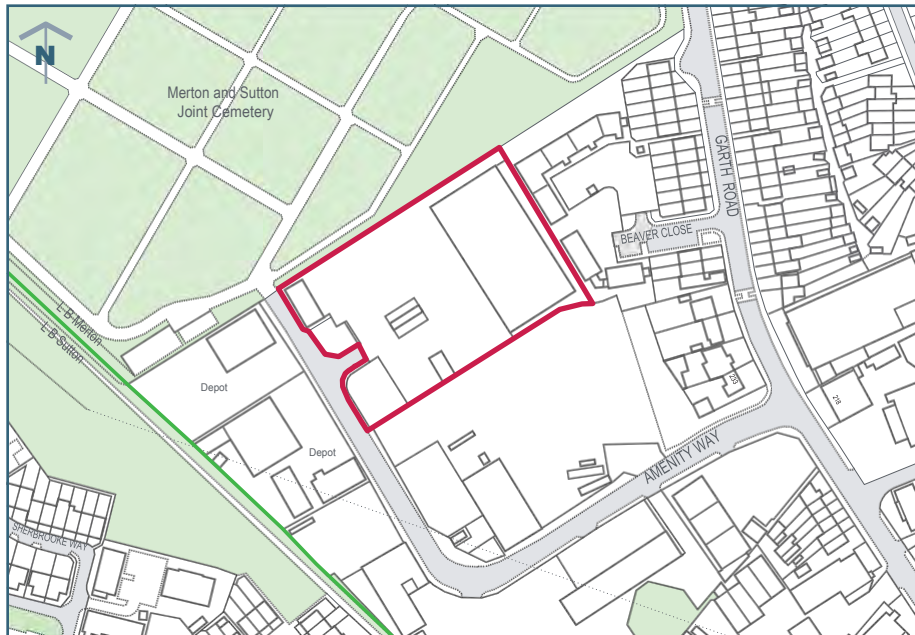
**Opportunity to increase waste managed** No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Providing appropriate soft landscaping

## M11 Morden Transfer Station, Amenity Way, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	39,950
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

### Site Description

Double-height industrial shed with hardstanding  
 The site lies within an industrial location surrounded by similar activities, and flats and a cemetery respectively along its north-eastern and north-western boundaries

**Planning Designations** Locally Significant Industrial Location

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 25 (as Sloane Demolition)

**Opportunity to increase waste managed** No. There are no known plans to intensify operations at the facility

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the adjacent cemetery
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

## M12 NJB Recycling, 77 Weir Road, Merton SW19 8UG



Not to Scale

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Site size (ha)	0.4
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	48,687
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	18,030 (C&D)

**Site Description** Enclosed triple-height shed with outside hardstanding space for vehicles  
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. The site is adjacent to a Gypsy and Traveller site in Wandsworth

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

### M13 One Waste Clearance, Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA



Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	20,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	13,453 (HCI) 4,547 (C&D)

Not to Scale

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**Site Description** The facility is a fully enclosed industrial unit Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

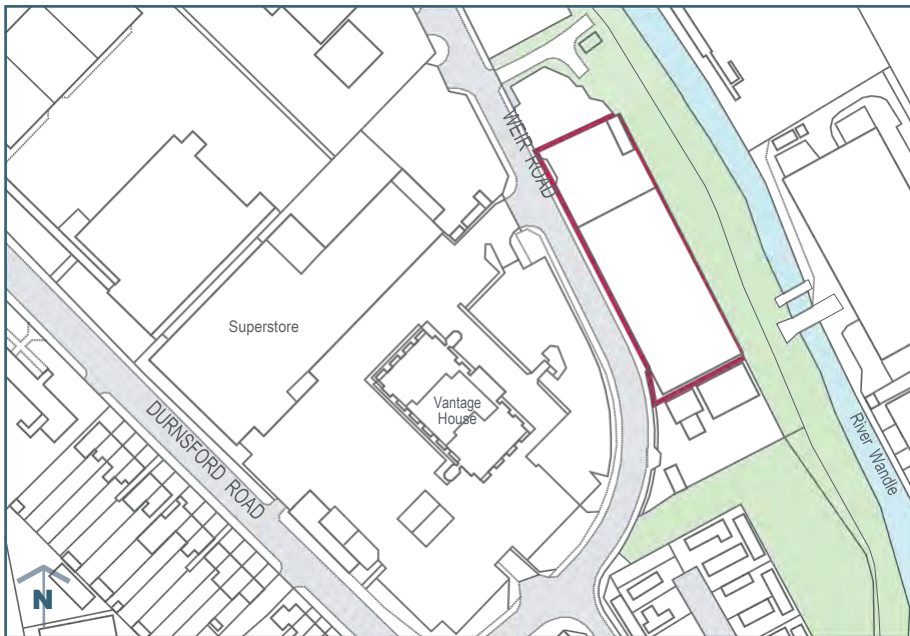
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is based on the few weeks the facility has been operating, which is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping



### M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG



Site size (ha)	0.43
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	71,595
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	30,131 (C&D)

Not to Scale

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**Site Description** Enclosed triple-height shed with outside hardstanding for vehicles Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

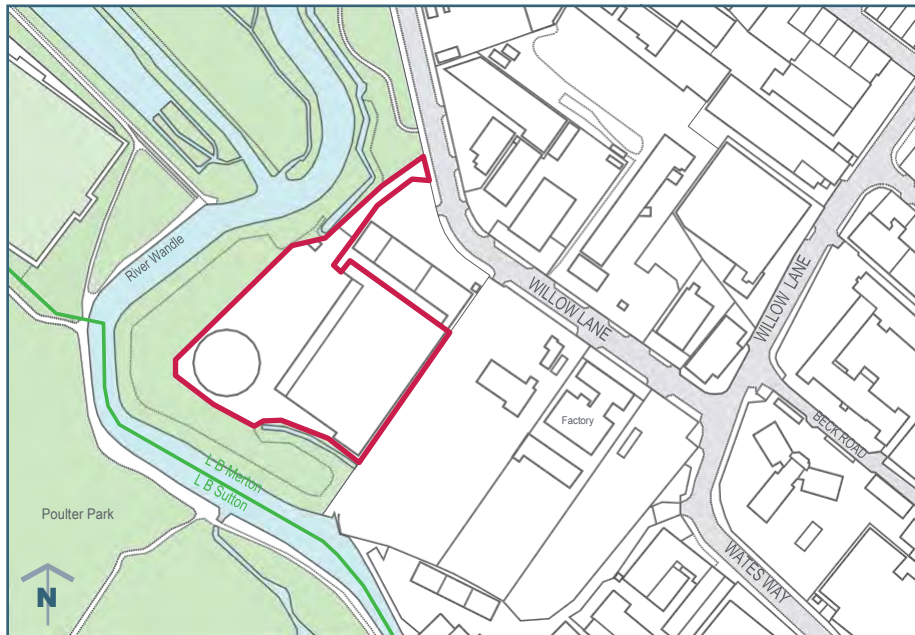
**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 27 (known as the SITA Transfer Station)

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping



**M15 Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA**



Not to Scale

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Site size (ha)	0.9 (includes M16)
Type of facility	Anaerobic Digestion
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	36,341
Licensed capacity (tpa)	99,999
Qualifying throughput (tpa)	46,341 (HCI)

**Site Description**

The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel  
 The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

**Planning Designations**

Strategic Industrial Location  
 Archaeological Priority Zone  
 Flood Zone 2

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: V (known as Vortal)

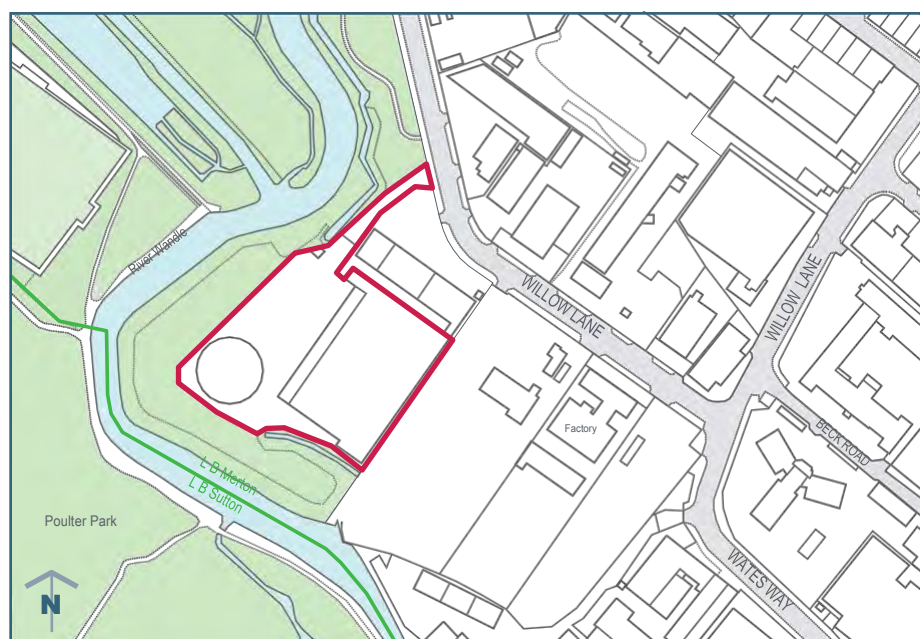
**Opportunity to increase waste managed**

No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Ensuring development does not affect adversely the adjacent Wandle Valley Conservation Area
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

## M16 Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.9 (includes M15)
Type of facility	Composting
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	51,715
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	51,715 (HCI)

**Site Description** The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel. The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone  
Flood Zone 2

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: V (known as Vortal)

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

### M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA



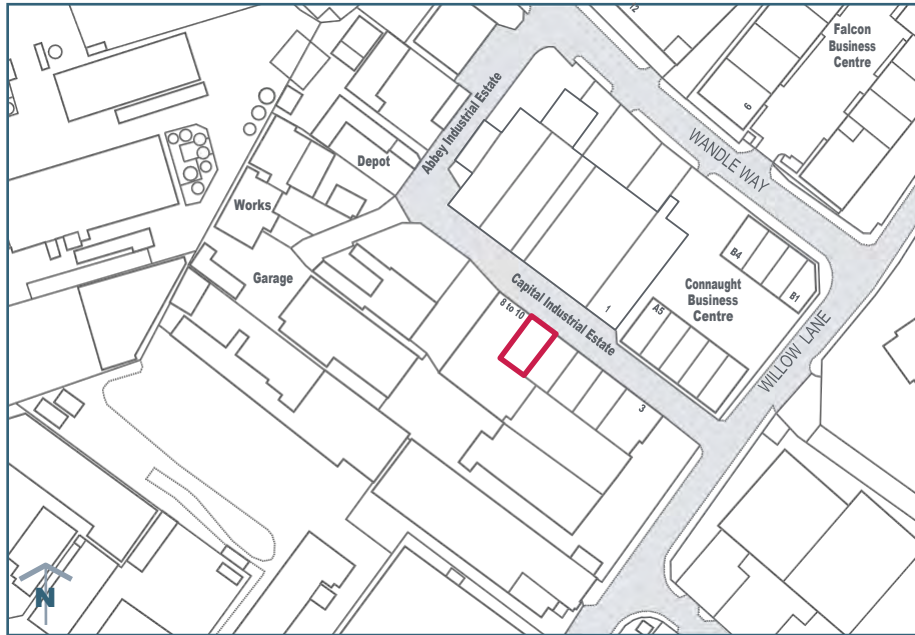
Site size (ha)	0.5
Type of facility	Treatment of waste to produce soil
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	804
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

Not to Scale

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<b>Site Description</b>	<p>A large site comprising a double-height industrial shed with hardstanding for vehicles, hardstanding for skips and construction, demolition and excavation waste</p> <p>The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties. The River Wandle lies to the west of the site.</p> <p>Connect House, which was converted to residential use through permitted development lies to the north-east of the site</p>
<b>Planning Designations</b>	<p>Strategic Industrial Location</p> <p>Archaeological Priority Zone</p> <p>Flood Zone 2</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	Yes. The site appears to be operating well below its potential as a waste management site and there is the opportunity to intensify operations and increase throughput on the site
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Providing appropriate soft landscaping</li> </ul>

### M18 Wandle Waste Management, Unit 7, Abbey industrial Estate, Willow Lane, Merton CR4 4NA



Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	141
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	0

Not to Scale

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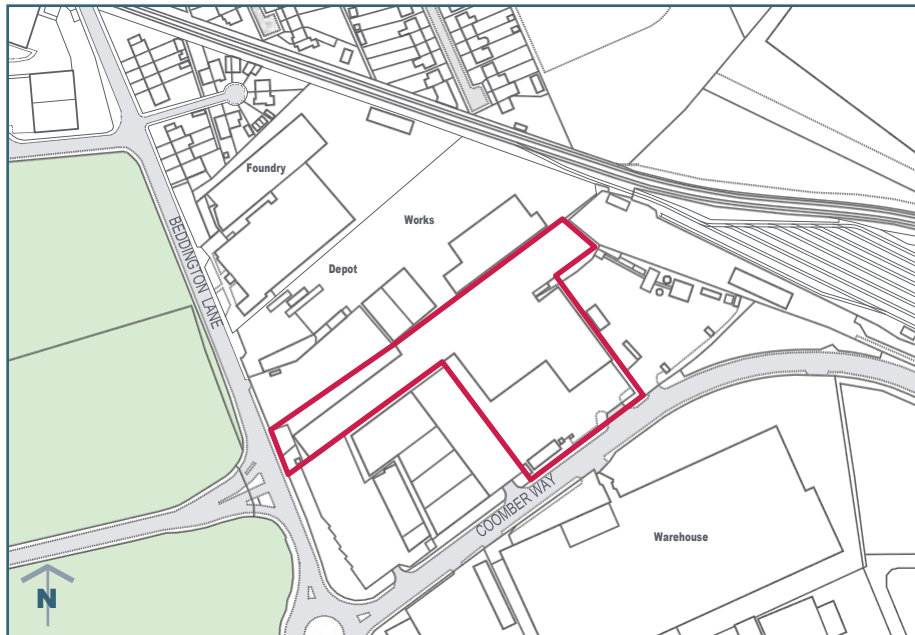
Site Description	<p>A double-height industrial shed</p> <p>The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties.</p> <p>Connect House, which was converted to residential use through permitted development lies to the south of the site</p>
Planning Designations	<p>Strategic Industrial Location</p> <p>Archaeological Priority Zone</p>
Currently Safeguarded	No
Opportunity to increase waste managed	No. The throughput on this site is very small and it is unlikely that there is an opportunity to intensify operations at the site
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Providing appropriate soft landscaping</li> </ul>







## S1 777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TE



Site size (ha)	1.0
Type of facility	Material Recycling and Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	56,912
Licensed capacity (tpa)	372,600
Qualifying throughput (tpa)	20,625 (HCI) 32,972 (C&D)

Not to Scale

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**Site Description** The site comprises large double-height and triple-height modern industrial sheds with hardstanding for skip storage and parking  
The site is part of a large strategic industrial location, backing on to tram lines to the rear.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 21

**Opportunity to increase waste managed** No. The site has a current maximum throughput of just under 57,000 tonnes

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the nearby underground electricity cable is neither damaged nor made inaccessible

## S2 Beddington Farmlands Energy Recovery Facility, 105 Beddington Lane, Sutton CR0 4TD



Site size (ha)	5.4
Type of facility	Energy from waste
Type of waste accepted	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	275,000
Licensed capacity (tpa)	302,500
Qualifying throughput (tpa)	275,000 (HCI)

Not to Scale

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**Site Description** An energy recovery facility. The facility lies within the Wandle Valley Regional Park and Metropolitan Open Land and is adjacent to the Viridor Recycling Facility and the Beddington Farmlands Landfill site. The land immediately to the east has permission for an extension to the Beddington Strategic Industrial Location

**Planning Designations** Metropolitan Open Land Metropolitan Green Chain  
 Site of Importance for Nature Conservation  
 Land safeguarded for the Wandle Valley Regional Park Archaeological Priority Zone

**Currently Safeguarded** No

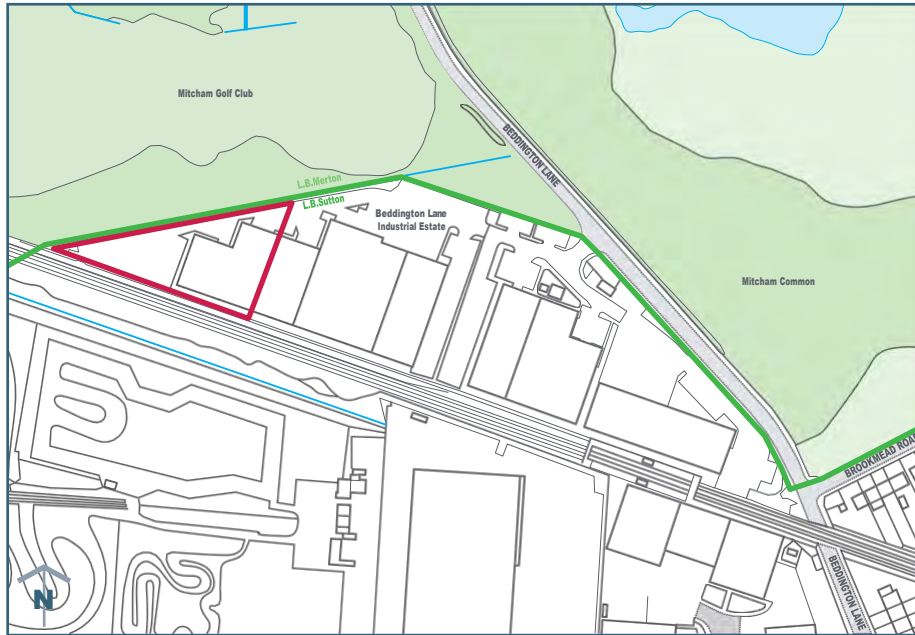
**Opportunity to increase waste managed** No. This is a new facility and therefore there are no opportunities to upgrade or intensify operations at the current time

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the future Wandle Valley Regional Park
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity and providing appropriate soft landscaping
- Ensuring nearby watercourses are not harmed by the development
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Ensuring the safety clearances for the overhead power lines crossing the site are respected

### S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TG



Site size (ha)	0.2
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	9,601
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

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<b>Site Description</b>	<p>Modern, double-height industrial unit</p> <p>The Beddington Lane industrial estate lies at the northern end of the Purley Way and Beddington Strategic Industrial Location. It largely comprises large, double-height industrial sheds with some ancillary office space</p>
<b>Planning Designations</b>	<p>Strategic Industrial Location</p> <p>Archaeological Priority Area</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	Yes. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the future Wandle Valley Regional Park</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity and providing appropriate soft landscaping</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Open Land</li> <li>● Consulting Transport for London for any impacts on the London Trams Network</li> </ul>

### S4 Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR



Not to Scale

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Site size (ha)	0.7
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	27,799
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	21,113 (HCI)

**Site Description** A double- and triple-height enclosed sheds with hardstanding for vehicles  
The site lies within a large industrial estate (Beddington Strategic Industrial Location) surrounded by similar industrial properties

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

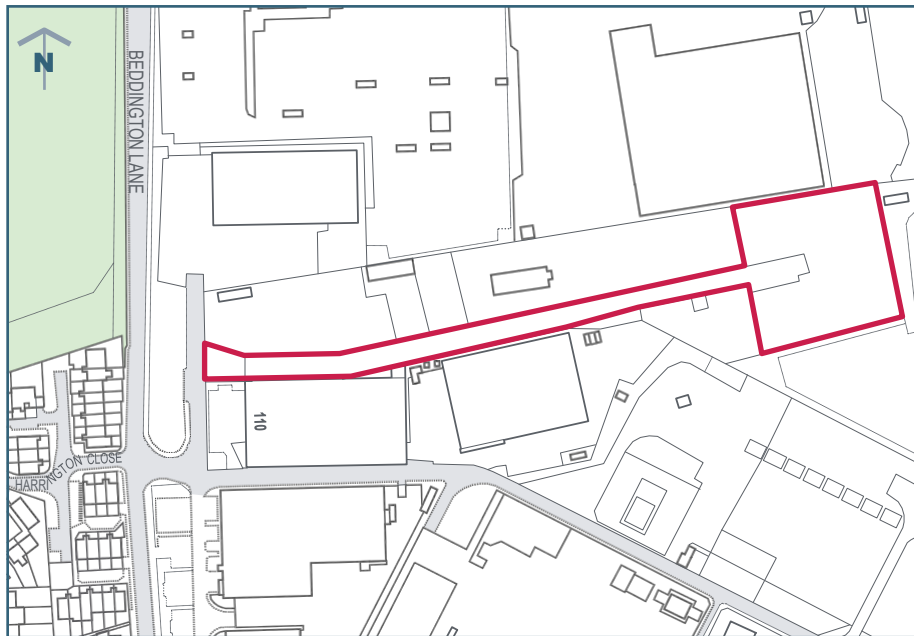
**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 98

**Opportunity to increase waste managed** Yes. The operator has stated it would be possible to intensify operations on site

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment on the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

## S5 Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton CR0 4TD



Not to Scale

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Site size (ha)	0.6
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	8,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	5,381 (HCI) 1,819 (C&D)

### Site Description

An enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles  
 The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area  
 Flood Zone 2

**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. This is a new facility which has only been operating for a short time. The operational throughput capacity of 8,000tpa has been estimated on the first quarterly return by the company. However, the planning application states that up to 50,000tpa could be managed on site. The estimated throughput is lower than average for this type of facility

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping
  - Ensuring the safety clearances for overhead power lines crossing the site are respected



## S6 Hydro Cleansing, Hill House, Beddington Farm Road, Sutton CR0 4XB



Not to Scale

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Site size (ha)	0.2
Type of facility	Physical Treatment
Type of waste	Wastewater and Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	13,912
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	0

### Site Description

Fronted by two-storey, 1960s office block with facility to the rear  
 The site is located on Beddington Farm Road in the Beddington Strategic Industrial Location. It is adjacent to the Surrey Jaguar Centre and the Royal Mail Centre

### Planning Designations

Strategic Industrial Location  
 Archaeological Priority Area

### Currently Safeguarded

No

### Opportunity to increase waste managed

No. The throughput per hectare is typical for this type of facility so it is unlikely that it will be able to intensify operations in its current form

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

## S7 Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton SM3 9QH



Not to Scale

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Site size (ha)	0.4
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,799
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	8,640 (HCI)

### Site Description

Open local authority reuse and recycling centre  
 The site is located in the north-west of the Kimpton Strategic Industrial Location.  
 The site is opposite the Kimpton Linear Park, which is designated as a Metropolitan Green Chain, Metropolitan Open Land and Public Open Space

Planning Designations Strategic Industrial Location

Currently Safeguarded Yes. Site Reference in 2011 SLWP: 3

Opportunity to increase waste managed No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Kimpton Linear Park
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping
  - Ensuring the safety clearance for the overhead power lines crossing the site are respected

## S8 King Concrete, 124 Beddington Lane, Sutton CR0 4YZ



Site size (ha)	0.6
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	1,060
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** Open site for concrete production and aggregates recovery with a further open yard and warehouse building  
 The site is part of the Beddington Strategic Industrial Location and is surrounded by similar uses

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

**Currently Safeguarded** No

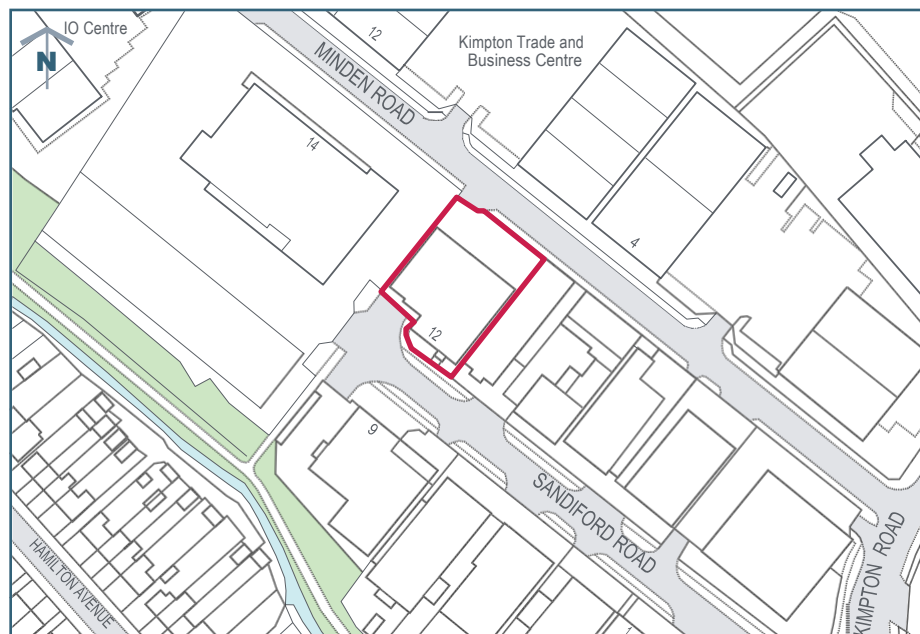
**Opportunity to increase waste managed** Yes. Although not all of the site is a waste recycling facility, it is managing well under the average throughput for this type of facility. The planning application states that the facility will recycle 20,000tpa of Construction, Demolition and Excavation waste on site

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the safety clearances for the overhead power lines crossing the sites are respected

## S9 Premier Skip Hire, Unit 12, Sandiford Road, Sutton SM3 9RD



Not to Scale

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Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	12,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	8,072

**Site Description** Two-storey office and warehouse building with hardstanding for skip storage  
 The site is located within the Kimpton Strategic Industrial Location and the closest residential properties are 75-100m south and west of the site on Hamilton Avenue

**Planning Designations** Strategic Industrial Location

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Providing appropriate soft landscaping

### S10 Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR



Site size (ha)	0.3
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	15,224
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	5,310 (HCI) 5,506 (C&D)

Not to Scale

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#### Site Description

Double-height enclosed sheds with hardstanding for skips  
 The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

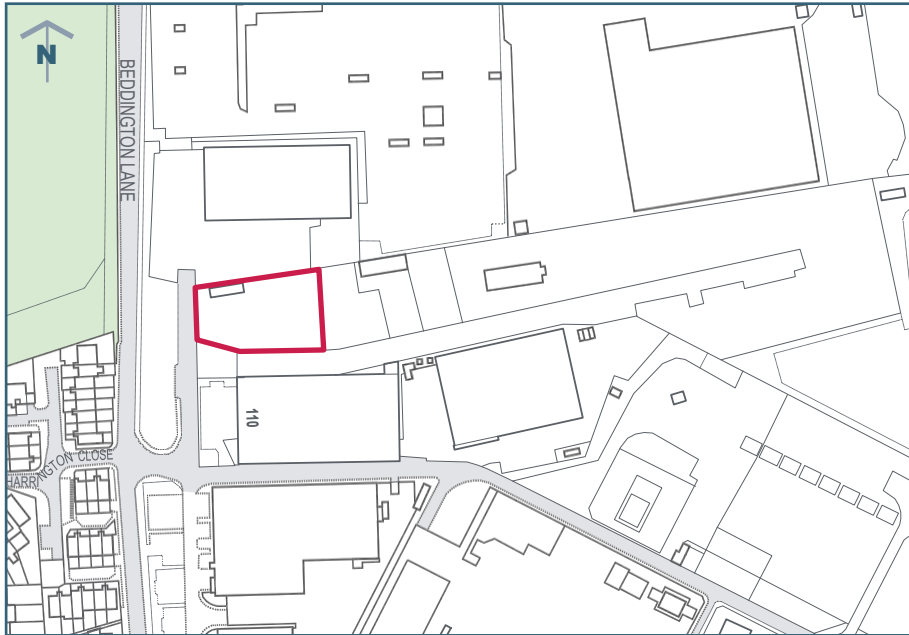
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Providing appropriate soft landscaping



## S11 TGM Environmental, 112 Beddington Lane, Sutton CR0 4TD



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	15,000
Qualifying throughput (tpa)	15,000 (HCI)

Not to Scale

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### Site Description

The site is currently being used for skip and vehicle storage by Raven Recycling. However the site has planning permission for waste paper and cardboard recovery by TGM Environmental with a throughput of 15,000 tonnes per annum. The site occupies the land to the front of 112 Beddington Lane. The site lies within the Beddington Strategic Industrial Location and similar uses surround the site.

### Planning Designations

Strategic Industrial Location  
Archaeological Priority Area  
Flood Zone 2

### Currently Safeguarded

No

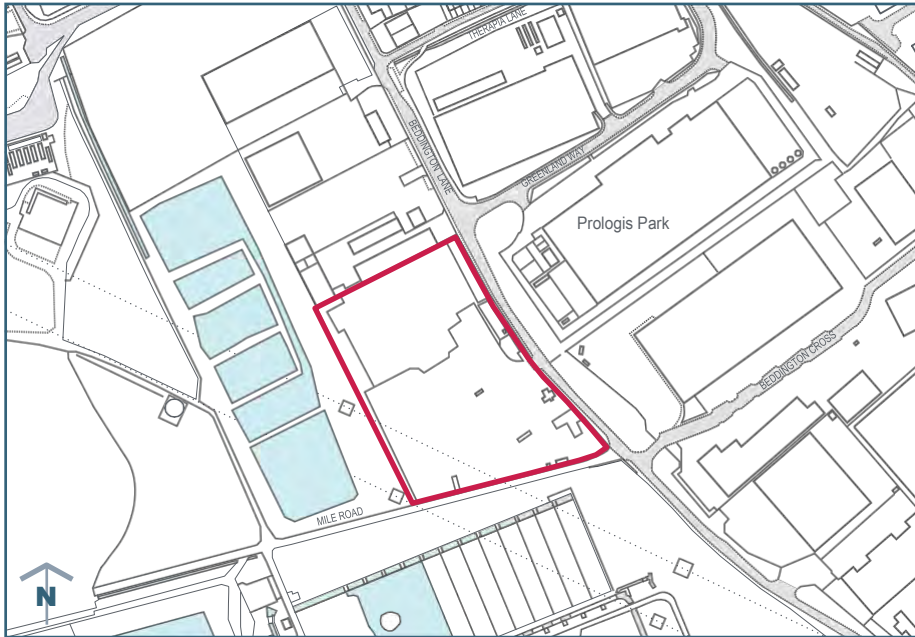
### Opportunity to increase waste managed

No. The operation has yet to relocate from 156 Beddington Lane. However this site offers additional space to enable the operator to undertake baling on site which did not take place on the previous site. The throughput is average for the size of the site and so it is unlikely that the facility can be intensified in its current form.

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

## S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH



Site size (ha)	2.8
Type of facility	Treatment with Transfer Station
Type of waste accepted	Household, Commercial and Industrial (HCI), Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	350,000
Qualifying throughput (tpa)	305,000 (HCI and C&D)

Not to Scale

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**Site Description** The site is currently vacant but the new planning permission proposal is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring. The site occupies the land to the west of Beddington Lane. It is surrounded by the proposed Wandle Valley Regional Park, Beddington Lane and industrial units to the north.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 17

**Opportunity to increase waste managed** No. The site has only recently been granted planning permission so no increase in the waste managed is likely to take place.

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the future Wandle Valley Regional Park
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Ensuring the safety clearances for the overhead power lines crossing the site are respected



## Appendix 1 Monitoring and Contingencies Table

Indicator 1 (for Policy WP1)	Household and Commercial and Industrial Waste Managed
<b>References</b>	Plan Objective :1 SA Objective: 1
<b>Target</b>	By 2036, 929,750 tonnes per annum
<b>Monitoring</b>	Monitor annually against target. Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	<p><b>Sites closing</b> – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p><b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify this failure. Possibly revise South London Waste Plan to provide more sites in light of evidence</p>

Indicator 2 (for Policy WP2)	Construction and Demolition Waste Managed
References	Plan Objective :2 SA Objective: 1
Target	By 2036, 414,380 tonnes per annum
Monitoring	Monitor annually against target. Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	<b>Sites closing</b> – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output <b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify this failure. Possibly revise South London Waste Plan to provide more sites in light of evidence

Indicator 3 (for Policy WP2)	Radioactive, Agricultural and Hazardous Waste Treated
References	Plan Objective :2 SA Objective: 1
Target	0 permissions
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	<b>Sites permitted</b> – Analyse the boroughs’ Development Management procedures to identify this failure. Examine whether there is any unidentified need for these streams of waste. Possibly revise South London Waste Plan in light of evidence.



Indicator 4 (for Policy WP3 & WP4)	Existing Waste Sites Safeguarded
References	Plan Objective :3 SA Objective: 1
Target	100% of safeguarded existing sites to be operational or to have compensatory provision provided
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	<p><b>Sites closing</b> – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p><b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise South London Waste Plan to provide more sites in light of evidence.</p>

Indicator 5 (for Policy WP5(b))	Compensatory or Intensified Sites with Fully Enclosed Covered Building
References	Plan Objective :6 SA Objective: 11
Target	100% of permissions
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs’ Development Management procedures to identify any failure. Examine whether there are specific reasons why sites without a fully enclosed covered building have not been permitted. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 6 (for Policy WP5(c))</b>	<b>Development on Green Belt, Metropolitan Open Land and Open Space</b>
<b>References</b>	Plan Objective :6 SA Objective: 6
<b>Target</b>	0 ha of development on Green Belt, Metropolitan Open and Open Space
<b>Monitoring</b>	Monitor annually against target
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites on Green Belt, Metropolitan Open and Open Space have been permitted. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 7 (for Policy WP5(c))</b>	<b>Development on Nationally, Regionally or Locally Designated Nature Conservation Areas</b>
<b>References</b>	Plan Objective :6 SA Objective: 12
<b>Target</b>	0 ha of development on Nationally, Regionally and Locally Designated Nature Conservation Areas
<b>Monitoring</b>	Monitor annually against target
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites with nationally, regionally or locally designated Nature Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 8 (for Policy WP5(c))</b>	<b>Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas</b>
<b>References</b>	Plan Objective :6 SA Objective: 14
<b>Target</b>	0 ha of development on Nationally, Regionally and Locally Designated Heritage Conservation Areas
<b>Monitoring</b>	Monitor annually against target
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites within Nationally, Regionally or Locally Designated Heritage Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 9 (for Policy WP5(c))</b>	<b>Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)</b>
<b>References</b>	Plan Objective :6 SA Objective: 7
<b>Target</b>	0 ha of development permitted against Environment Agency advice
<b>Monitoring</b>	Monitor annually against target
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted contrary to Environment Agency advice. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 10 (for Policy WP6)</b>	<b>Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating</b>
<b>Refernces</b>	Plan Objective 5
<b>Target</b>	100% of permissions
<b>Monitoring</b>	Monitor annually against target
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted have not achieved BREEAM or CEEQUAL "Excellent" rating. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 11 (for Policy WP7)</b>	<b>Development involving Energy from Waste</b>
<b>References</b>	Plan Objective :6 SA Objective: 3
<b>Target</b>	0 permissions
<b>Monitoring</b>	Monitor annually against target
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	None. There should be no permissions.

## Appendix 2 Sites Counting Towards the Apportionment and C&D Target

Ref	Name	HC&I	C&D	Potential for Intensification
<b>Croydon Capacity</b>				
C1	Able Waste Services	0	43,268	
C4	Days Aggregates Purley Depot	0	178,593	
C5A	Factory Lane Waste Transfer Station	0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre Site	9,623	5,206	
C6	Fishers Farm Reuse and Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Metals	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Reuse and Recycling Centre	6,684	0	
C11	SafetyKleen	0	0	
C12	Stubbs Mead Depot	0	0	
C13	Solo Wood Recycling	5,000	0	Yes
CEX	Exempt Sites	2,580	0	
	<b>Croydon Total</b>	<b>32,883</b>	<b>227,067</b>	
<b>Kingston Capacity</b>				
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Reuse and Recycling Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
	<b>Kingston Total</b>	<b>35,642</b>	<b>0</b>	
<b>Merton Capacity</b>				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M3	Deadman Confidential	9,866	0	
M4	Garth Road Reuse and Recycling Centre	15,704	0	
M5	Garth Road Transfer Station	0	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management (Wandle Way)	0	33,845	
M9	Maguire Skips	0	0	
M10	Powerday	0	42,856	
M11	Morden Transfer Station	0	0	



M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites	1,000	0	
	<b>Merton Total</b>	<b>213,179</b>	<b>150,183</b>	

### Sutton Capacity

S1	777 Recycling	20,625	32,972	
S2	Beddington Farmlands Energy Recovery Facility	275,000	0	
S3	Cannon Hygiene	0	0	
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Reuse and Recycling Centre	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Beddington Resource Recovery Facility	305,000	0	
S13	Exempt Sites	500	0	
	<b>Sutton Total</b>	<b>664,641</b>	<b>43,025</b>	

### South London Capacity

Croydon	32,883	227,067	
Kingston	35,642	0	
Merton	213,179	150,183	
Sutton	664,641	43,025	
<b>South London Total</b>	<b>946,345</b>	<b>420,275</b>	

### South London Capacity against Target

South London Capacity	946,345	420,275	
South London Target	929,750	414,380	
<b>South London Capacity against Target</b>	<b>+16,565</b>	<b>+5,895</b>	

## Appendix 3 Sites and Areas from the 2011 South London Waste Plan

Ref	Name	Borough	New Status
<b>Safeguarded Sites</b>			
1	Factory Lane Transfer Station	Croydon	Safeguarding carried forward as Site C5
2	Fisher's Farm Civic Amenity Site	Croydon	Safeguarding carried forward as Site C6
3	Kimpton Civic Amenity Site	Sutton	Safeguarding carried forward as Site S7
4	Purley Oaks Civic Amenity Site	Croydon	Safeguarding carried forward as Site C10
5	Pear Tree Farm Transfer Station	Croydon	Safeguarding carried forward as Site C9
6	Kingston Civic Amenity Site	Kingston	Safeguarding carried forward as Site K3
9	Garth Road Civic Amenity Site	Merton	Safeguarding carried forward as Site M4
17	Country Waste Recycling Ltd	Sutton	Safeguarding carried forward as SiteS12
18	Viridor Recycling and Composting Centre	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park
19	SE Skips/Waste World Ltd	Merton	Company replaced on Site M8 by LMD Waste Management
21	777 Recycling	Sutton	Safeguarding carried forward as Site S1
22	B Nebbett and Son	Merton	Company relocated and capacity transferred to Site M12
23	Five Star Japanese Autos	Merton	No longer managing waste in the area according to Environment Agency
25	Sloane Demolition	Merton	Safeguarding carried forward as Site M11 (now known as Morden Transfer Station)
26	Weir Road Civic Amenity Site	Merton	Closed and capacity transferred to Site M4: Garth Road Civic Amenity Site
27	SITA Transfer Station	Merton	Company replaced on Site M14 by Reston Waste Management
97	Sevenside Waste Paper	Sutton	Closed and capacity transferred to Site S11: TGM Environmental
98	Croydon Transfer Station	Sutton	Safeguarded carried forward as Site S4
100	European Metal Recycling (Therapia Lane)	Sutton	Closed and long-term vacant. Company relocated and capacity transferred to Site M2
101	Rentokil Initial Services Ltd	Merton	No longer managing waste in the area according to the Environment Agency
126	Benedict's Wharf Transfer Station	Merton	Closing and capacity transferred to Site S12: Country Waste Skip Hire
A	SafetyKleen	Croydon	Safeguarding carried forward as Site C11
B	Stubbs Mead Depot	Croydon	A feasibility study is being undertaken to understand the Local Plan housing allocation. It is due to be reported on in late October 2019. Safeguarding carried forward as Site C12.
V	Vertal	Merton	Safeguarding carried forward as Site M16 (now known as Riverside Bio)
BF	Beddington Farmlands Landfill	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park

Ref	Name	Borough	New Status
<b>Areas With Sites Which May Be Suitable For Waste Facilities</b>			
169	Willow Lane Industrial Estate	Merton	No longer needed
99	Purley Oaks Highways Depot	Croydon	No longer needed
102	Purley Way, Lysander Way, Imperial Way Industrial Estate	Croydon	No longer needed
105	Factory Lane Industrial Estate	Croydon	Safeguarding on part of area carried forward as Site C5
125	Factory Lane Industrial Estate (South Side)	Croydon	No longer needed
351	Chessington Industrial Estate	Kingston	No longer needed
252	Chessington Industrial Estate	Kingston	No longer needed
253	Chessington Industrial Estate	Kingston	No longer needed
491	Kimpton Industrial Estate	Sutton	No longer needed
532	Beddington Lane Industrial Estate	Sutton	No longer needed
533	Beddington Lane Industrial Estate	Sutton	No longer needed
534	Beddington Lane Industrial Estate	Sutton	No longer needed
535	Beddington Lane Industrial Estate	Sutton	No longer needed
539	Beddington Lane Industrial Estate	Sutton	No longer needed
5312	Beddington Lane Industrial Estate	Sutton	No longer needed
641	Durnsford Road Industrial Estate	Merton	No longer needed
642	Durnsford Road Industrial Estate	Merton	No longer needed
702	Garth Road Industrial Estate	Merton	No longer needed
1006	Wandle Valley Industrial Estate	Sutton	No longer needed



## Appendix 4 Glossary

### Anaerobic Digestion

Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used as fertiliser

### Beneficial Use

The placement of excavation waste in a way that:

- (1) provides environmental benefits, particularly in the restoration of priority habitats, flood alleviation or climate change adaptation/mitigation; or
- (2) contributes towards the restoration of landfill sites or mineral workings

### Circular Economy

A circular economy is an alternative to a traditional linear economy (make-use-dispose). In the circular economy, resources are kept in use for as long as possible, the maximum value is extracted from them while in use, and products and materials are recovered and regenerated at the end of each service life.

### Commercial Waste

Waste arising from trade premises

### Construction and Demolition Waste

Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

### DEFRA - Department for Environment, Food and Rural Affairs

Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment

### Environment Agency

A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters

### Excavation Waste

Soil, stone, rock and similar materials arising from site preparation activities

### Exemption

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within

### Hazardous Landfill

Sites where hazardous waste is landfilled. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been designed and designated for depositing hazardous waste

### Hazardous Treatment

Sites where hazardous waste is treated so that it can be landfilled

### Hazardous Waste

Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the characteristics, quantity or concentration of the waste

### HCI

Household, Commercial and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams



### Household Waste

Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders take to household waste reuse and recycling centres

### Industrial Waste

Waste from a factory or industrial process

### Inert Waste

Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater

### Inert Landfill

A landfill site that is licensed to accept inert waste for disposal

### In-Vessel Composting

A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are principal six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls

### ILW - Intermediate level radioactive waste

Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities

### Local Authority Collected Waste (LACW)

Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste and waste resulting from the clearance of fly-tipped materials

### Landfill

The permanent disposal of waste into the ground, by the filling of man-made voids or similar features

### Landfill Directive

European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation

### LLW – low level radioactive waste

Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

### Materials Recycling Facility (MRF)

A facility for sorting and packing recyclable waste

### Mechanical Biological Treatment (MBT)

The treatment of residual waste using a combination of mechanical separation and biological treatment

### Non-Hazardous Landfill

A landfill licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet relevant criteria

### Non-Inert

Waste that is biodegradable or may undergo significant physical, chemical or biological change once landfilled

### Organic Waste

Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

### Open Windrow Composting

A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

**Proximity Principle**

Requires waste should be managed as near as possible to its place of production, reducing travel impacts

**Recovery**

Reuse, recycling, composting or recovery of energy

**Recycled Aggregates**

Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads

**Recyclate**

Raw material sent to, and processed in, a waste recycling plant or materials recovery facility

**Recycling**

The reprocessing of waste either into the same product or a different one

**Residual Waste**

Waste remaining after materials for re-use, recycling and composting have been removed

**Reuse**

The cleaning or repairing of waste for use in its original form

**Waste Electrical and Electronic Equipment (WEEE)**

End of life electrical or electronic equipment and covers virtually everything with a plug or battery. There are specific sites for the depollution, disassembly, shredding, recovery or preparation for disposal. The sites must meet the EU's WEEE Directive.

**Waste Hierarchy**

A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be

prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal of this waste.

**Waste Local Plan**

A statutory development plan prepared by waste planning authorities, setting out policies in relation to waste management and related developments

**Waste Management**

Processes by which waste is reused, recycled or recovered. It does not include waste transfer (where waste is sorted and baled) or landfill

**Waste Minimisation / Reduction**

The most desirable way of managing waste, by avoiding the production of waste in the first place

**Waste Planning Authority (WPA)**

The local authority responsible for waste development planning and management. They are unitary authorities, including London Boroughs, and the City of London, National Park Authorities, and county councils in two-tier areas.

The WPAs for the South London Waste Plan are

- London Borough of Croydon,
- Royal Borough of Kingston,
- London Borough of Merton, and
- London Borough of Sutton

**Waste Regulation Authority**

The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

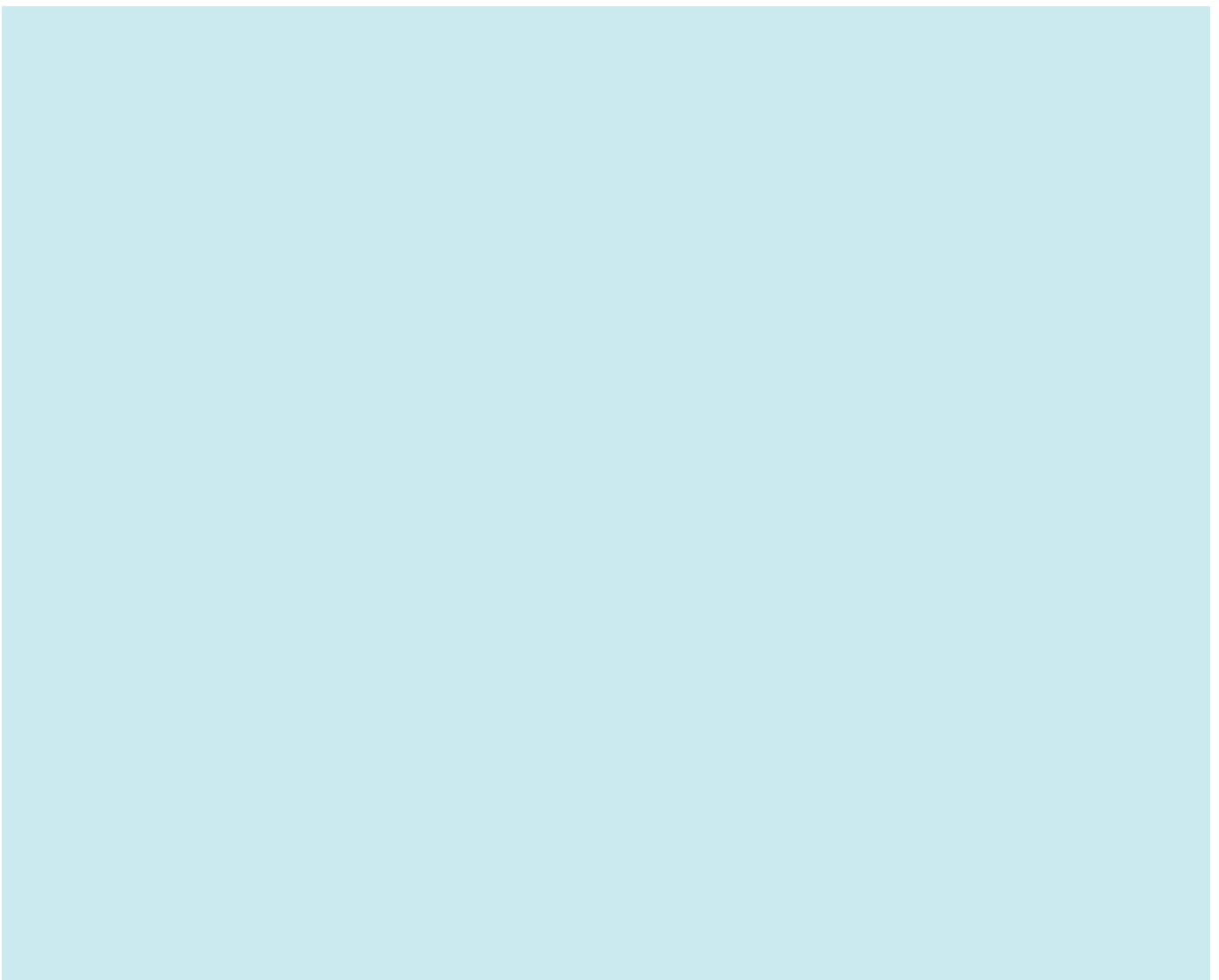
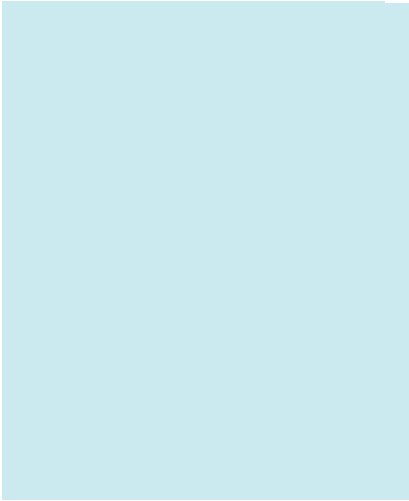
**Waste Transfer**

Processes by which waste is sorted or baled prior to transfer to another place for reuse, recycling, recovery or disposal. Although in practice, usually some reuse, recycling and recovery occurs in the sorting and baling.

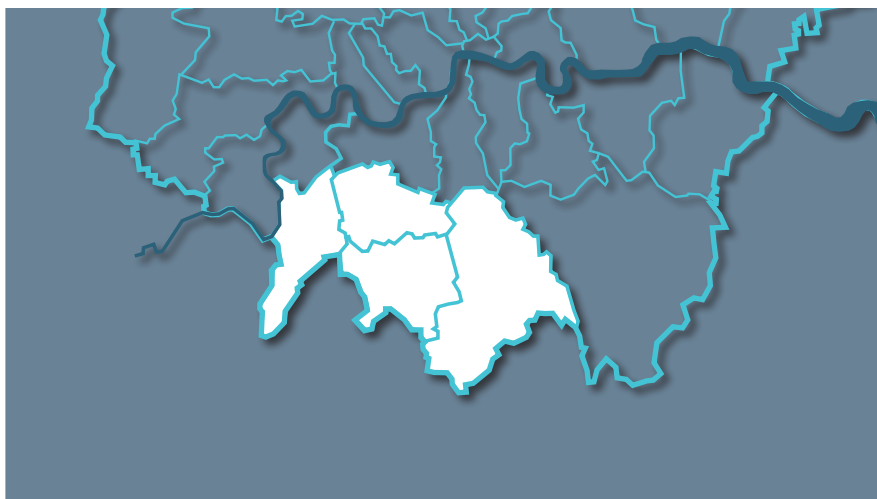
**Waste Treatment**

All processes for waste management (see above) and waste transfer (see





- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



Sustainability Appraisal (SA)  
 incorporating Strategic Environmental Assessment (SEA)  
 on Draft for Submission to Government

September 2020





## Executive Summary

This SA Report on the draft South London Waste Plan (SLWP) Submission Version provides a comprehensive review of current and future waste arisings within the plan area; existing waste management sites, throughput and capacity; national, sub-regional and local policies; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the proposed policies and safeguarded waste sites on each of the sustainability objectives making up the SA Framework. The SA Report is accompanied by an Equalities Impact Assessment (EqIA) report and Habitats Regulations Assessment (HRA) screening.

The report meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in national planning practice guidance and the SEA regulations respectively, and has been published to inform public consultation on the draft SLWP Submission Version from 4 September to 22 October (Regulation 19 consultation). It builds upon the SA Scoping Report and the SA Report on the SLWP Issues and Preferred Options document published for public consultation in October 2019 and takes account of representations received.

The SA Matrix in Section 12 demonstrates that draft Policies WP1-WP10, which have been developed by the four partner boroughs as the proposed strategy for the new SLWP for 2021-36 (Option 1), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

Overall, the most important sustainability benefits of the preferred strategy include:

- promoting **net self-sufficiency** within South London;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings;
- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in the plan area;
- 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;
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery**;
- helping to secure the transition to a **circular economy** within south London; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste uses.

Further stakeholder feedback arising from consultation will inform the preparation of the final plan to be submitted to the Government.



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# 1. Introduction

## Purpose of the new South London Waste Plan

1.1 The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21<sup>1</sup> introduced in 2012.

1.2 The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the draft London Plan up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy (see below), promote the circular economy and minimise any adverse impacts on nearby land uses and the local environment.

1.3 A new plan is needed from 2021 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaborative working at the sub-regional level is essential for effective waste planning.

1.4 Figure 1.1. shows the geographical coverage of the four partner boroughs.

**Figure 1.1: The South London Waste Plan area**



<sup>1</sup> the current South London Waste Plan 2012 is available at <https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view>

**1.5** Following public consultation on an Issues and Preferred Options document and accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation<sup>2</sup>), a draft version of the SLWP 2021-36 (the draft plan) has been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public. The draft plan, which incorporates a number of changes made in the light of representations received and changing circumstances, has now been published for further consultation in accordance with Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012. The draft plan safeguards 46 existing sites for waste treatment and identifies ten development management policies to guide waste treatment within the four boroughs over the next 15 years.

**1.6** This sustainability appraisal (SA) report, incorporating strategic environmental assessment (SEA), Equalities Impact Assessment (EqIA) and Habitats Regulations Screening, has been published for public consultation alongside the draft plan.

## National planning policy requirements

**1.7** The National Planning Policy for Waste<sup>3</sup> (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:

- undertaking early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial;
- driving waste management up the Government's waste hierarchy (see Figure 1.2), recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal;
- in particular, identifying the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (in London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans);
- considering the need for additional waste management capacity of more than local significance and reflecting any requirement for waste management facilities identified nationally;
- taking into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required;
- working collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management; and
- considering the extent to which the capacity of existing operational facilities would satisfy any identified need.

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<sup>2</sup> under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>3</sup> the NPPW is available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

Figure 1.2: The Waste Hierarchy



## London Plan Apportionment targets

1.8 The Intend to Publish London Plan (GLA, December 2019)<sup>4</sup> includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):

- the equivalent of 100% of London's waste managed within London (i.e. net self-sufficiency) by 2026 for all waste streams except excavation waste;
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

1.9 New apportionment targets are set for each borough in order to meet the net self-sufficiency target for local authority collected waste (LACW) and for commercial and industrial (C&I) waste.

Table 1.1 sets out the combined apportionment targets for South London for 2021 and at the end of the plan period in 2041.

**Table 1.1: Apportionment targets for South London in the Intend to Publish London Plan 2019**

Borough	Apportionment (tonnes per annum)	
	2021	2041
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
<b>Total</b>	<b>887,000</b>	<b>944,000</b>

## Requirement for Sustainability Appraisal

1.10 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal (SA) in the preparation of all development plan documents (DPDs) forming part of the local development plan, including local waste plans. SAs should incorporate the requirements of the UK Strategic Environmental Assessment (SEA) Regulations 2004, which implement the requirements of the EU SEA Directive 2001/42/EC. The purpose of SA is to ensure a high level of protection of the environment as part of the preparation of certain plans and programmes.

<sup>4</sup> the Intend to Publish London Plan 2019 is available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>



## What is sustainable development?

**1.11** The UK Sustainable Development Strategy (ODPM<sup>5</sup>, 2005) defines sustainable development as *"enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations"*. The Strategy is based on the following guiding principles:

### (1) Living within Environmental Limits

Respecting the limits of the planet's environment, resources and biodiversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.

### (2) Ensuring a Strong, Healthy and Just Society

Meeting the diverse needs of all people in existing and future communities, promoting personal well being, social cohesion and inclusion and creating equal opportunity for all.

### (3) Achieving a Sustainable Economy

Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them, and efficient resource use is incentivised.

### (4) Using Sound Science Responsibly

Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

### (5) Promoting Good Governance

Actively promoting effective, participative systems of governance in all levels of society, engaging people's creativity, energy and diversity.

**1.12** In seeking to regulate the development and use of land in the public interest, planning is key to achieving sustainable development by promoting environmental, economic and social objectives together over time. The revised National Planning Policy Framework (NPPF) (MHCLG, February 2019) defines the purpose of planning as follows:

- **economic** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **social** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;
- **environmental** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

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<sup>5</sup> the former Office for the Deputy Prime Minister

## Purpose of sustainability appraisal

**1.13** SA is integral to the preparation and development of all DPDs, including local waste plans. Its purpose is to promote the aims of sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The relationship between the SA and plan preparation processes is shown in Figure 1.3.

**1.14** SA reports on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development. By identifying key issues, developing policies and proposals and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable plans which are evidence-based. In the context of waste planning, the appraisal process can help planners and the public gain a better understanding of how well-designed waste facilities in the right locations can deliver long-term benefits for local environmental quality, promoting the circular economy and community well-being.

**1.15** To be effective, SA must be

- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- **Objectives-led:** the direction of desired change has measurable targets;
- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

**1.16** The SA process also provides the means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

**1.17** At the conclusion of the plan-making process, the final SA Report should describe how the adopted plan has addressed the sustainability agenda and the choices that have been made between alternative policies and proposals. This will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.

## Consultation on SA Scoping Report

**1.18** In order to meet the requirements of the SEA Directive and procedures for community engagement on local plan and SA documents set out in the statutory regulations and respective Statements of Community Involvement (SCI), an initial SA Scoping Report for the new SLWP was published over a five week period from **16 September until 21 October 2019** in order to seek the views of relevant bodies, namely the Environment Agency (EA), Natural England and Historic England, on the proposed scope of the appraisal.

**1.19** Its purpose was to define the scope of the appraisal and provide the basis for appraising the potential effects of alternative waste management policies against a comprehensive range of environmental, social and economic criteria. The sustainability objectives, indicators and targets making up the proposed SA Framework were shaped by the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning policies within each of the four boroughs.

**1.20** Responses to consultation on the SA Scoping Report were received from the Environment Agency (28 October 2019); Historic England (21 October 2019); and Natural England (17 October 2019). and the comments received have been incorporated within this SA Report. All representations received on the SA Scoping Report (and on the subsequent SA Report on SLWP Issues and Preferred Options) and how they have been addressed are set out in Appendix 3.

## Consultation on SA Report on SLWP Issues and Preferred Options

**1.21** Following extensive evidence gathering work, culminating in the production of a Technical Paper<sup>6</sup> by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report (see above), an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019. Importantly, the Issues and Preferred Options document identified that the four boroughs could meet the combined target for household and C&I waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the C&D waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.

**1.22** The Issues and Preferred Options document was accompanied by a further SA Report (incorporating SEA, EqIA and Habitats Regulations screening)<sup>7</sup>. Its purpose was to assess the likely effects of the 'preferred option' (consisting of the Vision, eight draft policies and 46 existing waste sites proposed to be safeguarded) and strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework.

**1.23** The SA Report concluded that draft Policies WP1-WP8, which were developed by the four partner boroughs as the 'preferred' strategy for the new SLWP (Option 1), would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 were shown to be overwhelmingly negative.

**1.24** All representations received on the SA Report on Issues and Preferred Options and how they have been addressed in this SA Report are, again, set out in Appendix 3.

## Coverage of SA Report on draft SLWP (Submission Version)

**1.25** This document is the SA Report on the draft SLWP 2021-36 (Submission Version). Its purpose is to assess the likely effects of the amended Vision, planning policies and identified sites and the main strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework. As before, the SA Report incorporates the requirements SEA, EqIA and Habitats Regulations screening.

**1.26** The following chapters address each of the key stages of appraisal set out in government guidance and best practice within the context of current and future waste arisings, the Vision and

<sup>6</sup> the South London Waste Technical Paper and accompanying Appendices are available at [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

<sup>7</sup> the SA Report on SLWP Issues and Preferred Options is available at [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

objectives for the new plan and prevailing social, economic and environmental trends within south London:

- **Section 2** describes the background to the preparation of the new **South London Waste Plan (SLWP)** and the next steps as the plan approaches the EiP stage;
- **Section 3** reviews **Current Waste Arisings and Capacity in South London** drawing upon the Technical Paper (Anthesis, June 2019) and updated evidence on waste management throughputs based on the EA's waste data interrogator as reported in Sutton's Authority Monitoring Report 2018-19 (LB Sutton, March 2020)<sup>8</sup>;
- **Section 4** outlines the main stages of **Sustainability Appraisal and Strategic Environmental Assessment** drawing upon government guidance and best practice;
- **Section 5** reviews other **Relevant Plans, Programmes and Sustainability Objectives** at the national, regional and local levels (**Task A1**)<sup>9</sup>;
- **Section 6** provides updated **Baseline** information for South London in terms of the key social economic and environmental trends likely to be influenced by the plan (**Task A2**);
- **Section 7** identifies the key **Sustainability Issues** to be addressed by the SLWP and the sustainability appraisal process, taking account of representations received at each stage (**Task A3**);
- **Section 8** sets out the finalised **Sustainability Appraisal Framework** consisting of the key sustainability objectives, indicators and targets against which the likely effects of the draft Plan and alternative options have been appraised (**Task A4**); and
- **Section 9** describes the process by which **Potential Waste Sites** have been identified and assessed as part of the evidence gathering stage. This chapter should be read in conjunction with the more detailed assessment set out in the Technical Paper, the accompanying Appendices and the updated waste throughput data set out in the Sutton AMR 2018-19 (**Task A5**); and
- **Section 10** describes the development of **Proposed SLWP Policies** and defines the strategic alternatives for the purpose of appraisal (**Task A5**); and
- **Section 11** analyses the **Compatibility of the Proposed Vision and Objectives against each of the Sustainability Appraisal Framework Objectives (Tasks B1)**
- **Section 12** sets out the **Results of Appraisal** for each of the draft policies (Policies WP1-WP8) and waste management sites set out in the draft Plan (**Tasks B3, B4 and B5**)
- **Section 13** sets out the **Conclusions (Task A5)**.

## Equalities Impact Assessment (EqIA)

**1.27** The purpose of Equalities Impact Assessment (EqIA) is to help public bodies identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 removed the formal requirement for public bodies in

<sup>8</sup> Sutton's AMR 2018-19 is available at [https://www.sutton.gov.uk/info/200464/planning\\_policy/1419/authority\\_monitoring\\_report\\_amr](https://www.sutton.gov.uk/info/200464/planning_policy/1419/authority_monitoring_report_amr)

<sup>9</sup> in line with best practice, a comprehensive scoping table will be provided as part of the next SA/SEA Report on SLWP Issues and Preferred Options which will be published for public consultation from 31 October to 22 December 2019

England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to 'give due regard' to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

**1.28** Since many of the issues to be addressed as part of the wider plan appraisal process will inevitably overlap with the consideration of potential impacts upon equalities groups, the requirements of EqIA will be integrated as part of the SA process.

**1.29** Accordingly, an updated EqIA Screening report on the draft SLWP (Submission Version) is included in this document as Appendix 1.

## Habitats Regulations Assessment (Appropriate Assessment)

**1.30** The need for habitats regulations assessment<sup>10</sup> (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive') as set out in the Conservation of Habitats and Species Regulations 2010 (as amended). The Regulations seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

**1.31** Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects.

**1.32** The following four European sites are located within or in relatively close proximity to the plan area and are therefore potentially affected by the new SLWP 2021-36:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).

**1.33** However, only Wimbledon Common SAC lies within the boundaries of the SLWP area.

**1.34** Following initial habitats regulations screening undertaken as part of the SA scoping stage, the four partner boroughs concluded that it was very unlikely that a full HRA will need to be prepared for the new waste plan for the reasons detailed in the SA Scoping Report and in Appendix 2 of the SA Report on SLWP Issues and Preferred Options.

**1.35** This view is supported by Natural England, the relevant statutory body with responsibility for promoting nature conservation. A letter sent by Natural England on 17 October 2019 in response to public consultation on the SA Scoping Report stated that it had "no comments" on the plan. In a subsequent email dated 31 January 2020 (see Appendix 2), Natural England confirmed that "no comments" should be interpreted by the four partner boroughs to mean that it does not consider that a full HRA is required for the SLWP.

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<sup>10</sup> HRA is also referred to as 'Appropriate Assessment'



## Sequential test (flood risk)

**1.36** The updated national planning policy framework (NPPF) requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Development plan documents should therefore apply a sequential, risk-based approach to designating sites in order to avoid flood risk to people and property and manage any residual risk, taking account of climate change, by applying the 'sequential test' and if necessary, applying the 'exception test' to all potential development sites in line with technical guidelines<sup>11</sup> set out in the NPPG.

**1.37** If, following the sequential test, it is not possible, consistent with wider sustainability objectives, for a proposed development to be located in lower flood risk zones, the following two elements of the 'exception test' must be demonstrated where appropriate:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
- a site-specific flood risk assessment (FRA) must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall..

**1.38** According to the Government's flood risk vulnerability classifications<sup>12</sup>, waste treatment facilities fall within the 'less vulnerable' category, with the exception of landfills and hazardous waste facilities, which are classified as 'more vulnerable'. Therefore, based on the government's flood risk vulnerability and flood zone compatibility table, the vast majority of waste sites (which do not involve hazardous waste or landfilling operations) are compatible with all EA flood zones up to and including Flood Zone 3a (high risk). However, a newly proposed site allocation or planning application for a hazardous waste facility located within Flood Zone 3a (high risk) must pass the exceptions test and should not be permitted at all within Flood Zone 3b.

**1.39** As can be seen from the response to consultation on the SA Scoping Report, the EA has undertaken a comprehensive review of the proposed waste sites identified in the Issues and Preferred options document against a range of environmental criteria including flood risk, proximity to main rivers, source protection areas and current environmental permit compliance rating.

**1.40** Since no new waste sites are being put forward part of the new SLWP and in view of the fact that all of the existing safeguarded sites within the plan area have previously been subject to the sequential and exceptions test as part of the preparation of the current SLWP 2011-21, and/or been subject to a site-specific flood risk assessment where necessary, it is considered that it is unnecessary to include a sequential test report as part of this document.

## Consultation arrangements

**1.41** This SA report is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from **4 September to 22 October 2020**.

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<sup>11</sup> formerly set out in the Government's Planning Policy Statement on Development and Flood Risk (PPS25) (now cancelled)

<sup>12</sup> see Table 3 at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/575184/Table\\_3\\_-\\_Flood\\_risk\\_vulnerability\\_and\\_flood\\_zone\\_compatibility.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility.pdf)

**1.42** Copies of the document and evidence are available at the following locations:

- [www.croydon.gov.uk/planningandregeneration/framework/localplan/slwaste-plan](http://www.croydon.gov.uk/planningandregeneration/framework/localplan/slwaste-plan);
- [www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/1353/new local plan](http://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan);
- [www.merton.gov.uk/local-plan](http://www.merton.gov.uk/local-plan); and
- [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations).

## 2. Background to the South London Waste Plan

### Current arrangements for waste collection and disposal

**2.1** Of the 33 London Boroughs, 21 are arranged into the four statutory joint waste disposal authorities (WDAs) covering East London, North London, West London and West London Riverside (2-tier system). However, each of these Boroughs is responsible for the collection of its own waste.

**2.2** The remaining 12 Boroughs, including the South London Boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames, are Combined Waste Collection and Disposal Authorities (i.e. unitary authorities), with separate responsibilities as Waste Collection and Disposal Authorities and as Waste Planning Authorities.

**2.3** Each borough's function as a waste planning authority is outlined in National Planning Policy for Waste<sup>13</sup> (NPPW) (DCLG, 2015) which requires that waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. This is the principal purpose of the South London Waste Plan (SLWP).

### South London Waste Partnership

**2.4** There are many advantages to joint working on a sub-regional level. Waste arisings rarely remain within individual borough boundaries and joint working can also achieve financial savings for individual boroughs. Accordingly, the four South London boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames formed the South London Waste Partnership in order to jointly procure waste treatment and disposal contracts for municipal waste. As the disposal authority for household waste collected by the four South London Boroughs, the South London Waste Partnership adopted a joint Municipal Waste Management Strategy<sup>14</sup> (JMWMS) for South London in 2011 covering the period 2010-20 with the aims of:

- minimising the climate change impact of managing municipal solid waste (MSW) through effective and efficient diversion from landfill;
- working at a sub-regional level to deliver cost effective and environmentally sound waste management services; and
- working towards conformity with the Waste Strategy for England 2007<sup>15</sup> and the London Municipal Waste Management Strategy.

**2.5** The most effective way of achieving these aims is to promote more sustainable waste management practices further up the waste management hierarchy (Figure 1.1).

**2.6** In 2008, the four partner boroughs decided to prepare a joint waste plan for South London in order to establish a framework of planning policies and site allocations to meet future waste capacity needs in South London for the period 2010-20.

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<sup>13</sup> the NPPW is available at

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

<sup>14</sup> the JMWMS 2010-20 is available at <http://www.slpw.org.uk/wp-content/uploads/2011/03/Waste-Strategy-FINAL.pdf>

<sup>15</sup> the Waste Strategy for England 2007 is available at <https://www.gov.uk/government/publications/waste-strategy-for-england-2007>

## The current South London Waste Plan 2012

**2.7** The current South London Waste Plan (SLWP), adopted in March 2012, sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within South London over the 10-year period from 2011-21. The SLWP, which forms part of the local development plan for each of the partner boroughs, safeguards 27 existing permitted waste facilities and identifies 11 broad locations (industrial areas) suitable for new waste facilities in order to meet the then London Plan apportionment for 2011 (Table 2.1) and sets out a number of criteria-based policies for determining planning applications for waste management facilities.

**Table 2.1: London Plan 2011 Combined Apportionments for the South London Waste Plan area**

Year	Combined municipal (MSW) and Commercial & Industrial (C&I) waste apportionment
2010	854,000 tonnes
2015	1,130,000 tonnes
2020	1,332,000 tonnes
2021 <sup>16</sup>	1,326,000 tonnes

**2.8** In seeking to meet and exceed the combined apportionment targets for municipal solid waste (MSW) and commercial and industrial waste (C&I), Policy WP1 of the SLWP aims to provide sufficient capacity within the four boroughs to manage:

- a minimum of 834,011 tonnes of waste by 2016 to meet the 2011 London Plan apportionment and strive to achieve self-sufficiency by providing 1,004,350 tonnes of capacity in total to meet South London's waste management needs; and
- a minimum of 941,024 tonnes of waste by 2021 to meet the 2011 London Plan apportionment and strive to achieve self-sufficiency by providing 1,017,427 tonnes of capacity.

**2.9** The above targets are to be achieved by safeguarding existing waste management capacity and encouraging intensification of existing waste sites identified in Policy WP3 and by developing additional capacity within the industrial areas identified in Policy WP4 where this complies with all other waste plan policy requirements and the waste hierarchy.

**2.10** Under Policy WP2, planning permission for additional facilities for other waste streams, including construction, demolition and excavation waste (CD&E), hazardous waste, agricultural waste, clinical waste, radioactive waste and waste water will be permitted where there is an identified need for such a facility within the South London Waste Plan area, which cannot be met through existing waste facilities or the adaptation of existing waste facilities.

**2.11** Since the adoption of the SLWP in 2012, the four partner boroughs have monitored performance against the above targets through the publication of an Annual Monitoring Report (AMR). Section 3 of this document provides a detailed review of current and future waste arisings within the plan area, and existing and potential waste management sites across the four boroughs drawing upon updated evidence set out in the Technical Paper.

**2.12** The SLWP plan period is now coming to an end and a new waste plan is required in order to meet the Mayor's updated apportionment targets from 2021 to 2041 in the 'Intend to Publish London Plan (GLA, December 2019) and a range of other sustainable waste management targets set out in the Mayor's Environment Strategy (GLA, 2018).

<sup>16</sup> the London Plan 2011 provided an apportionment to 2020. The 2021 apportionment was based on London's continuing 85% self-sufficiency and maintaining the Plan area's contribution to this

## Preparing the new South London Waste Plan 2021-36

### Consultation on SLWP Issues and Preferred Options document (Regulation 18 Consultation)

**2.13** Following extensive evidence gathering work, culminating in the production of the Technical Paper by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report, an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019.

**2.14** The following key waste planning issues were identified:

- Key Issue 1 Cross Boundary Issues;
- Key Issue 2 How much waste must the South London Waste Plan plan for?
- Key Issue 3: Scarcity of Land;
- Key Issue 4: Waste Transfer Facilities; and
- Key Issue 5: Climate Change, the End of Landfill, and the The Circular Economy.

**2.15** The document put forward eight draft waste policies and identified 46 existing sites across the four boroughs to be safeguarded for waste treatment uses over the plan period to 2036. Importantly, the document identified that the four boroughs could meet their target for household and commercial and industrial waste (C&I) by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall against the C&I target by allowing the intensification of treatment on existing sites. The document proposed no new waste sites, although a replacement site for an existing site would be considered.

**2.16** Consultation methods were developed in accordance with the statutory regulations and respective Statements of Community Involvement (SCIs) and included contacting all individuals and organisations on the respective planning policy consultation databases; dedicated consultation webpages; making the documents available at Council offices and libraries; notices in the local press; council tweets and Facebook posts; presentations to local neighbourhood committees; and letters delivered to residential properties in the vicinity of proposed waste sites.

**2.17** At the close of the consultation period, a total of 1,155 representations<sup>17</sup> had been received from 78 individual consultees. The key waste planning and sustainability issues arising from public consultation and how they have been addressed in the draft Plan are discussed further in Section 7.

### Publication Draft SLWP (Submission Version) (Regulation 19 Consultation)

**2.18** A draft version of the SLWP 2021-36 (the draft Plan) has now been published for public consultation between 4 September and 22 October prior to submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) for Examination-in-Public (EIP).

**2.19** The major changes made to the draft waste policies and sites proposed to be safeguarded in the Issues and Preferred Options document are as follows:

- **Key Issue 3 - Scarcity of Land** has been updated to reflect the fact that the London Plan housing targets have been reduced and to provide more statistics on the demand for industrial land from non-waste industrial uses;
- **The Vision and Objectives** have been amended because they did not quite reflect the policies;
- **Policy WP2 (Strategic Approach to Other Forms of Waste)** has been amended to reflect the move from a shortfall in C&D waste to a small surplus against the target. Also, the position regarding Excavation Waste has been clarified to reflect the concerns of South East councils;

<sup>17</sup> a complete list of representations to the SLWP Issues and Preferred document and to accompanying SA Report together with officer comments are available in the South London Waste Plan Examination Library



- **Policy WP6 (Sustainable Construction of Waste Facilities)** has been amended so that the sustainability credentials can be measured against one and/or two sustainability metrics;
- **Policy WP8 (New Development Affecting Existing Sites)** is a new policy to reflect the requests from SUEZ and Veolia. It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy;
- **Policy WP10 (Monitoring and Contingencies)** is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies;
- **Site C2 (Croydon Car Spares, Croydon)** has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- **Site C3 (Curley Skip Hire, Croydon)** has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- **Site C5 (Factory Lane Waste Transfer Station, Croydon)** has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners;
- **Site K1 (Chessington Equestrian Centre, Kingston)** has been deleted because it is a temporary site which is closing soon;
- other changes to safeguarded sites comprise boundary changes, references to overhead power lines and references to the need of a transport assessment including cumulative impacts;
- a table of indicators has been introduced as part of the draft Plan (as Appendix 1) for the purpose of monitoring the effectiveness of SLWP policies over the plan period; and
- new waste throughput figures have been included in Appendix 2 of the draft Plan in order to reflect the latest information from site owners and amendments as to which sites have potential for intensification.

**2.20** Any objections to the draft plan must be made with reference to the 'Tests of Soundness' in Paragraph 35 of the National Planning Policy Framework: **positively prepared; justified; effective; and consistent with national policy.**

#### Next Steps

**2.21** Following the publication of the draft Plan, there are a number of procedural steps that need to be followed before the SLWP 2021-36 can be adopted and these are set out in Table 2.1 below.

**Table 2.1: Timetable for adopting the new SLWP 2021-36**

Steps	Timescale
Draft SLWP Published and Representations Sought	October 2019
End of Representations Period	December 2019
Consideration of Representations	Jan-Sept 2020
Submission to the Secretary of State	November 2020
Appointment of Planning Inspector	TBC
Start of Hearings for the Examination-in-Public (EiP)	TBC
End of Hearings for the EiP	TBC
Main Modifications (arising from the EiP) <i>NB: This stage may not be required</i>	TBC
Issuing of the Inspector's Report	TBC
Recommendation for Adoption by the committees	TBC
Adoption at Full Council	TBC

## 3. Current Waste Arisings and Capacity in South London

### Evidence gathering

**3.1** Any new waste plan must be underpinned by a robust and proportionate evidence base document which includes an assessment of existing capacity, waste management need and suitable sites and areas to meet this need. Accordingly, the four partner boroughs commissioned Anthesis Consultants to prepare a comprehensive evidence base upon which the new South London Waste Plan 2021-36 can be prepared. The outcome of this comprehensive study is set out in the 'South London Waste Technical Paper (Anthesis, June 2019).

**3.2** The Technical Paper includes the following outputs:

#### Policy context

- a review of all legislation and policy relevant to waste planning in England and to the preparation of a waste development plan document (DPD) and its evidence base.

#### Waste arisings and forecasts for apportioned waste

- waste arisings and forecasts to 2036 for each waste type covered by the draft London Plan apportionment i.e. household and commercial & industrial (C&I) wastes.

#### Arisings and forecasts for other waste types

- waste arisings and forecasts for other waste streams that do not count towards the draft London Plan apportionment e.g. construction, demolition and excavation waste (CD&E), low level radioactive waste, agricultural waste, hazardous waste and wastewater.

#### Waste capacity assessment for apportioned waste

- an assessment of current and future waste management capacity of waste sites/facilities in each of the partner boroughs as well as in the SLWP area as a whole, including apportionment criteria<sup>18</sup>; existing capacity for permitted and exempt waste sites; the 'capacity gap' between apportionment targets and arisings of other waste types compared to the management capacity; and the likely land requirement to meet any shortfall (for each borough and collectively).

#### Sites and areas

- potential sites and areas which could help meet the capacity gap, either through the intensification of existing operations, or through delivery of new sites.

#### Imports and exports

- an assessment of waste imports and exports to and from the SLWP area.

#### Conclusions and recommendations

- key conclusions and recommendations arising from the study.

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<sup>18</sup> apportionment criteria are needed to determine what types of waste facility/operations should be counted as 'waste management' and therefore what waste streams should count towards the apportionment

## Waste arisings and forecasts for apportioned waste

**3.3** Table 3.1 shows forecast household and C&I waste arisings in the four boroughs over the plan period and the combined apportionment targets for managing this waste set out under Policy SI8 of the 'Intend to Publish' London Plan (GLA, December 2019)<sup>19</sup>. Unlike the existing London Plan, the new apportionment targets are not broken down into separate household and C&I waste streams.

**Table 3.1: Forecast household and C&I waste arisings and draft London Plan apportionments for 2021 to 2036 (tonnes per annum)<sup>20</sup>**

	2021		2026		2031		2036	
	Arisings	Apportionment	Arisings	Apportionment	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	309,000	256,000	312,000	260,000	320,000	264,000
Kingston	152,000	187,000	153,000	190,000	155,000	193,000	157,000	196,000
Merton	174,000	238,000	175,000	241,750	175,000	245,500	180,000	249,250
Sutton	161,000	211,000	161,000	213,500	161,000	217,000	168,000	220,550
<b>SLWP</b>	<b>792,000</b>	<b>887,000</b>	<b>800,000</b>	<b>901,250</b>	<b>808,000</b>	<b>915,500</b>	<b>825,000</b>	<b>929,750</b>

**3.4** The Mayor calculates future household waste arisings for each Borough on the basis of the average tonnage of waste generated per person multiplied by the forecast number of residents identified in the GLA's latest population projections. A 5% reduction is then factored in to account for the anticipated increase in waste management efficiency and the growth in the circular economy by the end of the London Plan period (2041).

**3.5** However, forecast household and C&I waste arisings are then redistributed amongst Boroughs for the purpose of setting revised London Plan apportionment targets. Boroughs considered to have more scope to manage higher levels of waste have been given a higher apportionment target and those considered to have less scope have a lower target. The Mayor used the following criteria for redistributing apportionment waste between boroughs:

- existing waste facilities and industrial land,
- arisings in a borough,
- presence of railheads and wharves,
- proximity to major routes,
- restrictive land designations (such as heritage or biodiversity),
- flood risk and
- socio-economic factors.

**3.6** It can be seen from the above table that three out of the four boroughs have been set apportionment targets which are higher than their anticipated waste arisings from 2021 to 2036, with the exception of Croydon, which has been set a lower target. Overall, the combined apportionment for the four boroughs is higher than the anticipated arisings over the plan period.

**3.7** In order to assess whether there is sufficient waste management infrastructure within the SLWP area, the new combined apportionment targets have been used, rather than forecast arisings.

<sup>19</sup> see Policy SI8 'Waste capacity and net waste self-sufficiency' at [https://www.london.gov.uk/sites/default/files/intend\\_to\\_publish\\_-\\_clean.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf)

<sup>20</sup> the new London Plan apportionment targets for each borough in 2021 and 2041 have been used to calculate targets for the intervening years up to the end of the SLWP period in 2036

## Arisings and forecasts of other waste types

### Construction and Demolition Waste Arisings

**3.8** Table 3.2 shows both the current and forecasted construction and demolition (C&D) waste arisings within the plan area. Figures for 2017 are taken from the Environment Agency's (EA) Waste Data Interrogator, and future arisings have been forecast using the GLA's employment forecasts for the construction sector until 2036. These figures show an increase in forecast C&D waste arisings from 382kt in 2017 to 414kt by 2036.

**Table 3.2: Forecast C&D waste arisings for the SLWP area (tonnes per annum)**

Area	Waste Source	Waste Type	2017	2021	2026	2031	2036
Croydon	C&D	Inert/C+D	282,613	292,593	294,629	300,542	304,303
		Hazardous	364	377	380	388	392
		<b>Total</b>	<b>282,977</b>	<b>292,970</b>	<b>295,009</b>	<b>300,930</b>	<b>304,695</b>
Kingston	C&D	Inert/C+D	37,530	37,850	38,242	39,002	39,002
		Hazardous	36	37	37	38	38
		<b>Total</b>	<b>37,566</b>	<b>37,887</b>	<b>38,279</b>	<b>39,040</b>	<b>39,040</b>
Merton	C&D	Inert/C+D	46,243	47,956	50,051	52,081	54,016
		Hazardous	19	19	20	21	22
		<b>Total</b>	<b>46,262</b>	<b>47,975</b>	<b>50,071</b>	<b>52,102</b>	<b>54,038</b>
Sutton	C&D	Inert/C+D	15,478	15,638	15,834	16,214	16,576
		Hazardous	29	29	30	30	31
		<b>Total</b>	<b>15,507</b>	<b>15,667</b>	<b>15,864</b>	<b>16,244</b>	<b>16,607</b>
SLWP	C&	Inert/C+D	381,865	394,036	398,756	407,838	413,897
		Hazardous	448	463	467	477	483
		<b>Total</b>	<b>382,313</b>	<b>394,499</b>	<b>399,223</b>	<b>408,315</b>	<b>414,380</b>

### Low Level Radioactive Waste

**3.9** According to the EA's public register, there are ten organisations holding 13 permits to keep and use radioactive materials within the four SLWP boroughs. These are mainly hospitals, universities and private companies. Any discharges from these permitted facilities to air, water (including discharges to sewer) and land are regulated and monitored under the Pollution Prevention and Control (PPC) regime. The latest EA dataset (2017) identifies small permitted discharges to sewer within the plan area but no solid waste transfer, and therefore this waste places no requirement on the SLWP to deliver additional solid waste management infrastructure.

### Agricultural Waste

**3.10** Data from the WDI shows that only 383 tonnes of waste from agricultural sources were generated within the SLWP area in 2017. Given the relatively small tonnage of this waste and the predominantly urban character of the four boroughs, this waste stream is not considered to require further consideration.

### Hazardous Waste

**3.11** Table 3.3 shows that hazardous waste arisings within the plan area are predicted to increase from 20.2 ktpa in 2017 to around 21.6 ktpa by 2036 based on the EA's Hazardous Waste Data Interrogator (WD).

**3.12** Future hazardous waste arisings have been forecast using anticipated growth rates in the GLA's draft London Plan and forecast C&I waste arisings. However, these tonnages are already included in the household and C&I waste apportionment and in forecasted CD&E waste arisings.

**Table 3.3: Hazardous waste arisings in the SLWP area (tonnes per annum)**

	2017 (baseline)	2021	2026	2031	2036
Croydon	8,514	9,008	9,008	9,008	9,193
Kingston	2,404	2,404	2,404	2,404	2,432
Merton	4,325	4,591	4,591	4,591	4,685
Sutton	4,936	5,239	5,239	5,239	5,303
<b>SLWP</b>	<b>20,180</b>	<b>21,242</b>	<b>21,242</b>	<b>21,242</b>	<b>21,612</b>

### Wastewater

**3.13** Thames Water is responsible for wastewater and sewage sludge treatment in London and for the management of sewage treatment works (STWs) and associated sewerage infrastructure. Wastewater quantities are expected to increase from 52.9 million m<sup>3</sup>/yr to 55.7 million m<sup>3</sup>/yr over the plan period. The four boroughs are served by STWs at Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC). Thames Water has confirmed that these facilities have adequate capacity to manage the incoming sewage and have all had major capacity increases since 2010<sup>21</sup>.

## Waste exports and imports

**3.14** In total for the combined household and C&I (apportioned) waste streams, in the baseline year of 2017, the SLWP area exported 309,700 tonnes but 'received' around 620,000 tonnes of apportioned waste which was not identified as being generated within the four boroughs. This would suggest that the SLWP area is a net importer of waste. However, a very large proportion of the imports were non-codeable (ie. origin data not provided), and therefore some of this waste is likely to have been generated within the four boroughs themselves. There is no way of attributing this tonnage to specific WPAs. In addition, 235,000 tonnes of waste received (38% of the total) was received by transfer stations, rather than final destination waste treatment facilities.

**3.15** Similarly, 238,000 tonnes of CD&E waste was exported from the SLWP area to other WPAs. However, again although the figure for imports is higher at 393,000 tonnes, only 91,000 tonnes were attributable to specific WPAs, and the remaining origins are unknown. And 71% of the waste imported (278,300 tonnes) was received by transfer stations, rather than final destination waste treatment facilities.

**3.16** For hazardous waste, as the data source is different, there is less uncertainty with regard to origins. In this case, the SLWP area exported 20,200 tonnes in 2017, with 20% of this going to Kent. South London received 800 tonnes in 2017, and so is a net exporter of hazardous waste.

<sup>21</sup> details of STW capacity increases in recent years are set out in the Thames Water Asset Management Plans for 2010-15 (AMP5) and for 2015-20 (AMP6)



## Existing waste management sites and capacity

**3.17** As part of the evidence base for the new plan, a comprehensive analysis has been undertaken for all operational waste management sites in South London in order to establish current and future waste management capacity within the plan area. A number of data sources were used, including discussions with site owners and EA 'active sites', Waste Data Interrogator (WDI) and environmental permitting data (using 2017 as the baseline year).

**3.18** In line with the Intend to Publish London Plan 2019, waste is deemed to be 'managed' where:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra definition as a minimum<sup>22</sup>.

**3.19** Where material is bulked at transfer stations for transportation to other waste management facilities, this capacity is not included as a contribution towards the apportionment targets. However, where a proportion of the incoming waste is recycled, this recycling capacity has been included.

**3.20** Table 3.4 below provides a breakdown of existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment for household and C&I waste. Where relevant, opportunities to increase capacity are identified, such as intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses.

**3.21** Waste facilities in the planning pipeline were identified which, if given permission, would also contribute towards meeting any shortfall in waste management capacity. Exempt sites, which do not require an environmental permit, have also been included where capacity meets the requirements of the London Plan.

**3.22** The waste capacity information in Table 3.4 has been revised following consultation on the SLWP Issues and Preferred Options document in order to accommodate new waste throughput figures and to reflect the latest information from site owners as to which sites have potential for intensification. In addition, a number of sites have been amended or deleted as follows:

- Site C2 (Croydon Car Spares, Croydon) has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- Site C3 (Curley Skip Hire, Croydon) has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- Site C4 (Days Aggregates): The estimated throughput of C&D waste at this site has been increased from 0 to 178,593 tonnes per annum following consultation with the site owner;
- Site C5 (Factory Lane Waste Transfer Station) has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners; and
- Site K1 (Chessington Equestrian Centre) has been deleted because it is a temporary site which is closing soon.

<sup>22</sup> refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns

**3.23** The most significant outcome of the above changes (arising from the increased throughput figures for the Days Aggregates site C4) is that the overall current throughput of C&D waste across the four boroughs has increased from 241,682 to 420,275 tonnes per year.

**3.24** Table 3.4 shows that the current capacity for the management of household and C&I waste in South London is 946,345 tonnes per annum. This represents a capacity surplus of 16,595 tonnes per annum compared to the combined apportionment of 929,750 tonnes per annum for 2036.

**3.25** The overall current throughput of C&D waste across the four boroughs, at 420,275 tonnes per year, now exceeds forecast C&D arisings at the end of the plan period in 2036 (414,380 tonnes per annum) by +5,895, where there was previously an estimated shortfall of 172,698 tonnes per annum.

**Table 3.4 Sites Counting Towards the Apportionment and C&D Targets (updated)**

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
<b>Croydon</b>				
C1	Able Waste Services	0	43,268	
C4	Days Aggregates Purley Depot	0	178,593	
C5A	Factory Lane Waste Transfer Station	0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre site	9,623	5,206	
C6	Fishers Farm Reuse & Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Materials	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Civic Amenity Site	6,684	0	
C11	Safety Kleen	0	0	
C12	Stubbs Mead Depot	0	0	
C13	Solo Wood Recycling	5,000	0	Yes
CEX	Exempt Sites	2,580	0	
	<b>Croydon Total</b>	<b>32,883</b>	<b>227,067</b>	
<b>Kingston</b>				
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Civic Amenity Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
	<b>Kingston Total</b>	<b>35,642</b>	<b>0</b>	
<b>Merton Capacity</b>				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M3	Deadman Confidential	9,866	0	
M4	Garth Road Re-use and Recycling Centre	15,704	0	
M5	Garth Road Transfer Station	0	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management Wandle Way	0	33,845	
M9	Maguire Skips (Wandle Way)	0	0	
M10	Powerday (Weir Court)	0	42,856	

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
M11	Morden Transfer Station	0	0	
M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites	1,000	0	
	<b>Merton Total</b>	<b>213,179</b>	<b>150,183</b>	
<b>Sutton Capacity</b>				
S1	777 Recycling Centre	20,625	32,972	
S2	Beddington Farmlands ERF	275,000	0	
S3	Cannon Hygiene	0	0	
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Civic Amenity Site	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Country Waste Skip Hire	305,000	0	
SEX	Exempt Sites	500	0	
	<b>Sutton Total</b>	<b>664,641</b>	<b>43,025</b>	
<b>South London Capacity</b>				
	Croydon	32,883	227,067	
	Kingston	35,642	0	
	Merton	213,179	150,183	
	Sutton	664,641	43,025	
	<b>South London Total</b>	<b>946,345</b>	<b>420,275</b>	
<b>South London Capacity Gap</b>				
	South London Capacity (2017 baseline year)	946,345	420,275	
	South London Apportionment/Forecast for 2036	929,750	414,380	
	<b>Capacity Gap/ Surplus</b>	<b>+16,595</b>	<b>+5,895</b>	

Source: Anthesis Consultants 2019 (incorporating subsequent amendments 2020)

**3.26** More detailed site profiles are set out in Appendix 4 of the Technical Paper, including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility and planning constraints. Further information on exempt sites and assumed capacities are provided in Section 5.2.3 of the Technical Paper.



## 4. Sustainability Appraisal and Strategic Environmental Assessment

### Government Guidance and best practice

4.1. The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new South London Waste Plan (SLWP) is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended.

### Main Stages of Appraisal

4.2. Government guidance identifies five main stages of appraisal (A to E) that should be carried out as part of the preparation of all development plan documents (DPDs), including jointly prepared plans such as the SLWP. Each stage consists of a number of 'key tasks' as outlined below.

#### Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

4.3. Stage A, to be undertaken as part of the evidence-gathering process, consist of the following tasks:

- **Task A1:** Identifying other relevant policies, plans and programmes, and sustainability objectives which are likely to influence the options to be considered (Section 5);
- **Task A2:** Collecting 'baseline' information to enable the impacts of policy options on sustainability objectives to be predicted and monitored (Section 6);
- **Task A3:** Identifying sustainability issues and environmental problems as the basis for defining key issues for the plan to address (Section 7);
- **Task A4:** Developing the SA Framework, consisting of sustainability objectives, indicators and targets, in order to test the environmental, social and economic effects of the plan (Section 8); and
- **Task A5:** Consulting on the scope of the SA on the basis of a scoping report presenting the outcome of Stage A.

4.4. The SA Scoping Report, published for public consultation between 16 September and 21 October 2019, presents the outcome of Stage A in relation to the appraisal of the emerging SLWP.

#### Stage B: Developing and Refining Options and Assessing Effects

4.5. Stage B, which has been carried out as part of the process of identifying SLWP issues and preferred options, involves:

- **Task B1:** Testing plan objectives against the SA Framework to ensure compatibility;
- **Task B2:** Developing plan options, working with the community and stakeholders, in order to achieve the objectives and contribute to sustainable development;
- **Task B3:** Predicting the social, economic and environmental effects of the plan options against the SA Framework and comparing with the 'no plan' and 'business as usual' scenarios;
- **Task B4:** Evaluating the effects of the plan in terms of their significance and the overall sustainability of each option, including the 'preferred option';
- **Task B5:** Considering ways of mitigating adverse effects and maximising beneficial effects; and
- **Task B6:** Proposing measures to monitor the significant effects of plan implementation.



Stage C: Preparing the Sustainability Appraisal Report

4.6. The SA Report, which must be prepared prior to publication, is the key output of the appraisal process:

- **Task C1:** Preparing the SA Report.

4.7. The SA Report should present the outcome of Stages A and B and clearly show that the SEA Directive's requirements have been met in terms of providing information on the likely significant effects on the environment, the reasons for selecting the alternatives dealt with and measures to prevent, reduce or offset any potentially adverse effects.

4.8. In the context of the emerging SLWP, Task C1 has been undertaken in two stages (i) the preparation of the SA Report on SLWP 'Issues and Preferred Options' which was published for public consultation as part of the Regulation 18 process between 31 October and 22 December 2020; and (ii) the SA Report on the SLWP Submission Version (this document) which has been published for public consultation between xxx MONTH and yyy MONTH as part of the Regulation 19 process.

Stage : Consulting on Preferred Options

4.9. Stage D involves the following Tasks:

- **Task D1:** Public participation on Preferred Options and the SA Report to give the public and statutory bodies an opportunity to comment;
- **Task D2(i):** Appraising significant changes which may have been incorporated within the plan prior to submission;
- **Task D2(ii):** Appraising significant changes resulting from representations; and
- **Task D3:** Making decisions and providing information through the production of an Adoption Statement to accompany the adopted plan. The Adoption Statement will outline how the findings of SA have been taken into account and how sustainability considerations have been integrated into the plan.

Stage E: Monitoring the significant effects of implementing the plan

4.10. Stage E requires the significant effects of the plan to be monitored in order to measure its performance against sustainability objectives and inform future policy revisions:

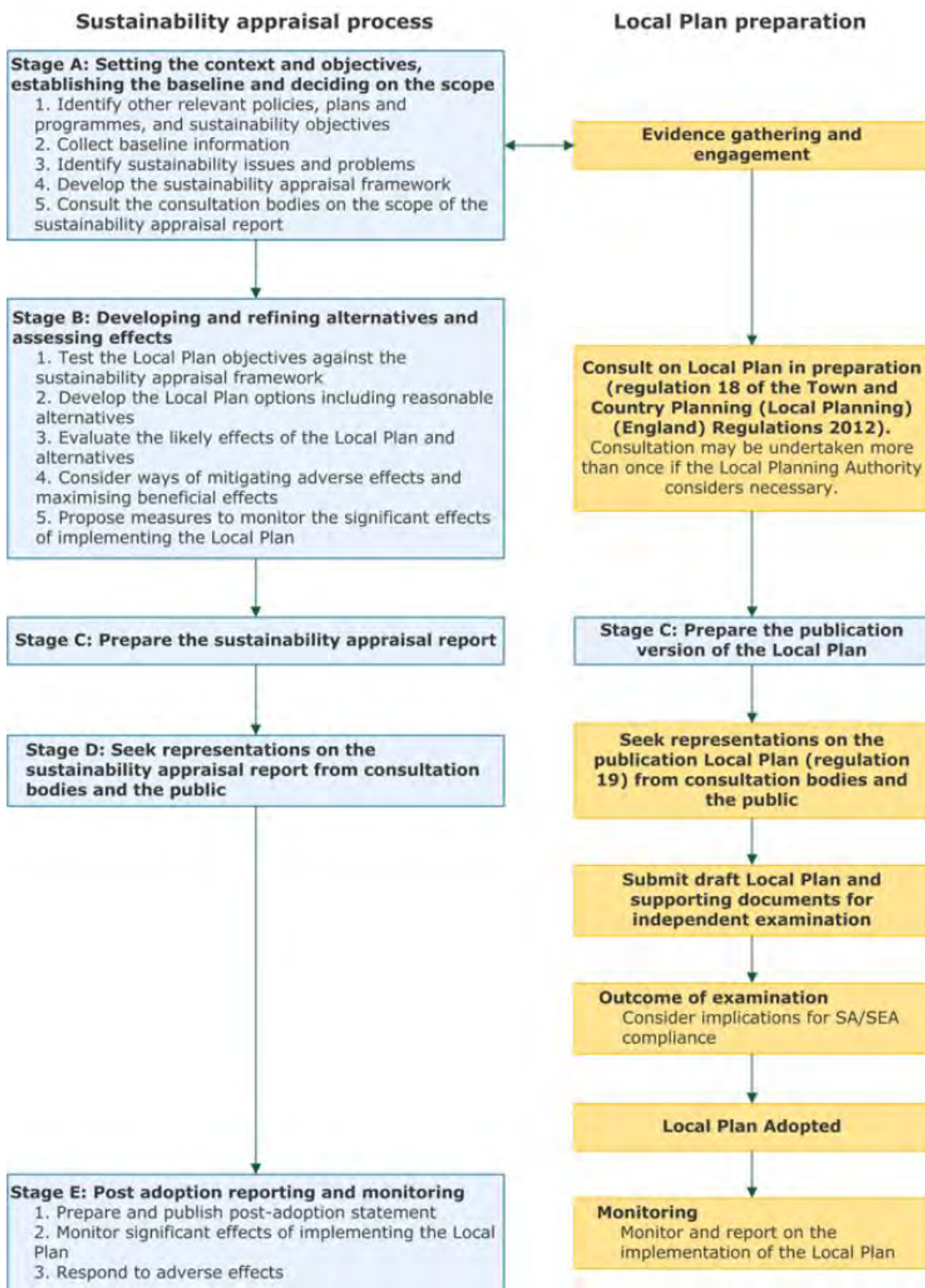
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

4.11. In line with Government guidance, Authority Monitoring Reports (AMRs) should include the findings of plan and SA monitoring. In the case of the SLWP, it is intended that the Sutton AMR will provide the means for reporting on the significant effects of the plan in order to measure its performance against the sustainability objectives, indicators and targets making up the SA Framework (see Section 9).

## Key Outputs of Appraisal

4.12. Figure 4.1 shows main stages of SA in relation to the plan-making process.

Figure 4.1: Main Stages of SA in relation to the DPD Process



**4.13.** Table 4.1 sets out the key outputs of the SA process in relation to the new SLWP in terms of the expected timescale for the preparation of SA Reports for public consultation.

**Table 4.1: Key Outputs of the SA process**

Stage of Plan Preparation	Key Appraisal Outputs (publication of SA Reports)	Timescale
Evidence Gathering	<ul style="list-style-type: none"> <li><b>SA Scoping Report</b> <i>SA Tasks A1-A5</i></li> </ul>	Consultation with relevant bodies 16 September – 22 October 2019
Consultation on Issues and Options	<ul style="list-style-type: none"> <li><b>SA Report on Issues &amp; Options</b></li> <li>Equalities Impact Assessment (EqIA) report</li> <li>Habitats Regulations Assessment (HRA) screening <i>SA Tasks B1-B6</i></li> </ul>	31 October - 22 December 2019
Consultation on draft SLWP Proposed Submission	<ul style="list-style-type: none"> <li><b>SA Report on Proposed Submission</b></li> <li>EqIA</li> <li>HRA (if required) <i>SA Tasks C1 and D1-D2</i></li> </ul>	4 September - 22 October 2020
Submission of draft SLWP incorporating minor changes to the Secretary of State	<ul style="list-style-type: none"> <li><b>SA Report on Submission Draft incorporating minor changes</b></li> <li>EqIA</li> <li>HRA (if required) <i>SA Tasks C1 and D1-D2</i></li> </ul>	TBC
Examination-in-Public	<i>SA Tasks C1 and D1-D2</i>	TBC
Inspector's Report	<i>SA Tasks C1 and D1-D2</i>	TBC
Adoption of SLWP incorporating modifications	<ul style="list-style-type: none"> <li><b>SA Report on modifications</b> arising from Inspector's Report <i>SA Task D3</i></li> </ul>	TBC
Post-adoption	<ul style="list-style-type: none"> <li><b>ongoing monitoring of SLWP</b> (via AMRs) <i>SA Tasks E1 and E2</i></li> </ul>	TBC

## Equalities Impact Assessment

**4.14.** An Equalities Impact Assessment (EqIA) is defined by the Equality and Human Rights Commission<sup>23</sup> as "a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody". EqIAs help local planning authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should therefore inform policy preparation from the earliest stages of plan making.

**4.15.** EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to "give due regard" to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying with this duty.

<sup>23</sup> further details are available on at <http://www.equalityhumanrights.com>

**4.16.** When applied to policy documents such as the SLWP, the first stage of EqIA involves screening to identify the potentially beneficial and adverse impacts of emerging policies and proposals on each of the specific equality target groups and to identify any gaps in knowledge. Then - where any potentially significant adverse effects are identified and/or if the potential impact is not intended and/or illegal - a full stage 2 assessment should be carried out. This should focus on the significant negative impacts and identify possible mitigation measures. Consultation with stakeholders and members of equality target groups should be undertaken during this phase.

**4.17.** A full EqIA report has therefore been prepared and included in this document as Appendix 1.

## Habitats Regulations Assessment (HRA)

**4.18.** The purpose of the Habitats Regulation Assessment (HRA) of land use plans (often referred to as 'Appropriate Assessment') is to ensure that the protection and integrity of European nature conservation sites (also known as the Natura 2000 network) is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that a HRA must be carried out on all land use planning documents. This requirement has subsequently been implemented in the UK through an amendment to the 1994 Conservation (Natural Habitats) Regulations (August 2007). The regulations are responsible for safeguarding conservation sites of EU importance such as Special Protection Areas (SPAs), Special Areas for Conservation (SACs) and international RAMSAR sites.

**4.19.** Government guidance identifies three steps to the HRA process (1) likely significant effects (2) appropriate assessment and ascertaining the effect on site integrity, and (3) mitigation and alternative solutions. Task 1 of the HDA process, which identifies whether a plan is 'likely to have a significant effect' on a European site, is referred to as 'screening' under the Regulations.

**4.20.** An HRA screening report has therefore been prepared and included in this document as Appendix 2.





## 5. Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

### Policy review

**5.1** A comprehensive review of all international, national, regional and local policies, plans and programmes relevant to the South London Waste Plan (SLWP) has been carried in order to identify key sustainability objectives for the purpose of appraisal and waste management issues to be addressed in the Plan.

**5.2** This chapter outlines the policy context within which the plan is being prepared at the European, national, subregional and local level. Details of the review findings are set out in Chapter 2 of the South London Waste Technical Paper (Anthesis, June 2019) and Section 5 of the SA Scoping Report (September 2019).

### International context

#### European Union (Withdrawal Agreement) Act 2020 ('Brexit')

**5.3** The EU (Withdrawal Agreement) Act 2020, which was given Royal Assent on 23 January 2020, transposed the current framework of environmental regulation set out in EU Directives into UK law and therefore provides some degree of certainty in terms of policy direction for the immediate future.

#### EU<sup>24</sup> Waste Framework Directive 2008

**5.4** The EU Landfill Directive 1999/31/EC aims to minimise the negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements and setting the following targets for the reduction of biodegradable municipal waste going to landfill:

- by 2010 to reduce the biodegradable municipal waste disposed to landfill to 75% of that produced in 1995;
- by 2013 to reduce the biodegradable municipal waste disposed to landfill to 50% of that produced in 1995; and
- by 2020 to reduce the biodegradable municipal waste disposed to landfill to 35% of that produced in 1995.

#### EU Waste Framework Directive 2008

**5.5** Article 28 of the EU Waste Framework Directive 2008 requires all Member States to produce a Waste Management Plan. This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery installations. In the UK, these locational criteria are deferred to the Local Plans or waste plans prepared by local planning authorities. The new SLWP will therefore form part of the UK's Waste Management Plan. The Government's Resources and Waste Strategy (see below) commits to reviewing the Waste Management Plan for England in 2019.

#### Waste Electrical and Electronic Equipment Directive

**5.6** The Waste Electrical and Electronic Equipment Directive 2002/96/EC (or 'WEEE' Directive) seeks to address the increasingly rapid growth of waste electrical and electronic equipment and sets out measures to promote the re-use, recycling and recovery of such wastes in order to reduce the need for disposal.

<sup>24</sup> while the UK left the EU on 31 January 2020, all relevant EU Directives have been transposed into UK law through the EU (Withdrawal Agreement) Act 2020

### EU Review of Waste Policy and Legislation

**5.7** The 'Review of Waste Policy and Legislation' published by the EU in December 2015, introduces higher targets for recycling and for the phasing out the landfilling of organic and recyclable materials. This means that any additional waste management facilities required to meet these new targets must be planned for in waste plans. The London Environment Strategy (GLA, 2017) includes similar targets, such as recycling 65% of municipal waste by 2030, and these have been incorporated into the draft new London Plan (GLA, 2017).

### UNESCO World Heritage Convention

**5.8** The 'Convention Concerning the Protection of the World Cultural and Natural Heritage' was adopted by UNESCO in 1972 and has been signed by 193 countries.

### European Convention on the Protection of Archaeological Heritage

**5.9** The Convention for the protection of the architectural heritage of Europe is a legally binding instrument setting a framework for an accurate conservation approach in Europe.

## National context

### Localism Act 2011 and the Duty to Co-operate

**5.10** Section 110 of the Localism Act 2011 prescribes the 'Duty to Co-operate' between local authorities in order to ensure that they work together on strategic cross-boundary issues such as waste planning.

### HM Government 25 Year Environment Plan

**5.11** A Green Future: Our 25 Year Plan to Improve the Environment', sets out the following strategic goals for 'Maximising resource efficiency and minimising environmental impacts at end of life':

- (i) Achieving zero avoidable plastic waste by the end of 2042;
- (ii) Reducing food supply chain emissions and waste;
- (iii) Reducing litter and littering;
- (iv) Improving management of residual waste;
- (v) Cracking down on fly-tippers and waste criminals; and
- (vi) Reducing the impact of wastewater.

### UK Resources and Waste Strategy (December 2018)

**5.12** The Government's 'Resources and Waste Strategy for England'<sup>25</sup> was introduced in December 2018, building on the earlier publication of 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>26</sup> in January 2018. In seeking to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy, the strategy:

- commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in order to align national policies with the Resources and Waste Strategy;
- introduces proposals to ensure that producers will pay for the disposal of their own packaging; set a tax on plastic packaging which does not include 30% recycled content; establish deposit return schemes; deliver streamlined recycling and food waste collection services for households and businesses; and improve the efficiency of energy recovery facilities;
- commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets; and
- seeks to tackle the problem of waste crime, which cost the English economy around £600 million in 2016, harms local communities and which pays no heed to the value of scarce resources.

<sup>25</sup> available at <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

<sup>26</sup> available at <https://www.gov.uk/government/publications/25-year-environment-plan>

Waste Management Plan for England

**5.13** The Waste Management Plan for England (Defra, 2013) identifies how much waste is generated in England, how that waste is managed and future waste infrastructure needs in order to meet the obligations of the revised EU Waste Framework Directive. It confirms that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England.

National Planning Policy Framework

**5.14** The revised National Planning Policy Framework (NPPF) (MHCLG, February 2019) states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence which should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. Local Plans should be:

- (a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- (b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- (c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- (d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

**5.15** The South London Waste Technical Paper (Anthesis, June 2019) focuses on meeting the above requirements, including identifying South London’s objectively assessed waste management needs (positively prepared); enabling an appropriate strategy to be identified for managing South London’s waste (justified); identifying strategic waste exports from South London (effective); and ensuring conformity with waste policies (consistent with national policy).

**5.16** The revised NPPF sets out the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate (DtC). When assessing if the SLWP is sound, the Inspector will look to statements of common ground between the four boroughs and neighbouring authorities in London and the South East for evidence that cross-boundary strategic matters have been addressed and that they have complied with the DtC.

National Planning Policy for Waste (NPPW)

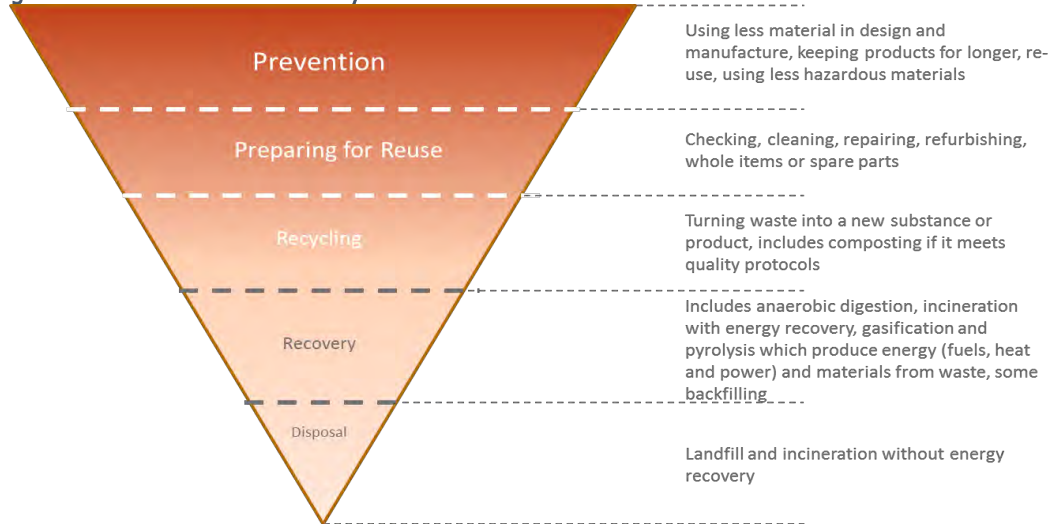
**5.17** The National Planning Policy for Waste<sup>27</sup> (DCLG, 2015) sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW requires waste planning authorities to:

- prepare Local Plans or local waste plans which drive waste management up the waste hierarchy (see Figure 5.1);
- have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management;
- allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan (suitable areas can be identified as well as sites

<sup>27</sup> the National Planning Policy for Waste is available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

- for new or enhanced waste management facilities);
- provide additional capacity through facilitating the maximum use of existing facilities;
- direct new waste facilities towards industrial locations;
- identify broad types of waste management facility that would be appropriately located on allocated sites or in suitable areas in line with the waste hierarchy; and
- seek opportunities to co-locate waste management facilities together with complementary activities.

Figure 5.1: The Waste Hierarchy



**5.18** Local waste plans must be underpinned by a proportionate evidence base which establishes the need for waste management facilities and identifies suitable sites and areas to meet this need. The evidence base should include details of:

- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings.

**5.19** Information on existing waste management facilities should include:

- site location details – site name, operator, address, postcode, borough, grid reference etc;
- type of facility - what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details - reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;
- capacity information - licensed and permitted throughput by waste type;
- site lifetime or maximum capacity - it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources - origin of wastes managed, broken down by type and location;
- outputs from facility - recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information - potential of site for increasing throughput, adding further capacity, other waste management uses etc.

**5.20** The Technical Paper provides up-to-date information relating to each of the above points and therefore provides a sound evidence base for preparing the new SLWP.

National Planning Practice Guidance (PPG)

**5.21** National Planning Practice Guidance<sup>28</sup> (DCLG, 2015) states that a Local Plan relating to waste should identify sufficient opportunities to meet the identified needs of an area for the management of waste in order to drive waste management up the waste hierarchy. Suitable sites and areas for waste management should be identified in appropriate locations to deal with the following streams:

- municipal/household;
- commercial/industrial;
- construction/demolition;
- low level radioactive;
- agricultural;
- hazardous; and
- waste water.

**5.22** Local plans should not generally prescribe the waste management techniques or technologies that will be used to deal with specific waste streams in the area (i.e. waste Local Plans should be 'technology blind'). Rather, the Plan should identify the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area. The government tries not to direct towards one waste technology above any others, when there may be a number of technologies, both existing and developing, that might deliver the same favourable outcome.

**5.23** Waste planning authorities should engage and collaborate with local communities in an early and meaningful way when identifying options for managing waste. This is particularly the case when considering proposals for waste management facilities such as incinerators which can be locally controversial. To be effective, engagement should be proactive to ensure that local communities are able to understand the range of options that are available and their implications.

**5.24** The PPG emphasises that waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place.

Planning (Listed Buildings and Conservation Areas) Act 1990

**5.25** The Planning (Listed Buildings and Conservation Areas) Act changed laws relating to the granting of planning permission for building works, with a particular focus on listed buildings and conservation areas. It provides specific protection for buildings and areas of special architectural or historic interest and introduced special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as for Conservation Areas.

Ancient monuments and Archaeological Areas Act 1979

**5.26** The Ancient monuments and Archaeological Areas Act 1979 provides specific protection for monuments of national interest

## London context

London Environment Strategy

**5.27** The Mayor's London Environment Strategy (GLA, May 2018) sets out the following overarching objectives for waste:

- Objective 7.1: Drive resource efficiency to significantly reduce waste, focusing on food waste and single use packaging waste;

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<sup>28</sup> National Planning Practice Guidance (PPG) on waste is available at <https://www.gov.uk/guidance/waste#preparing-local-plans>



- Objective 7.2: Maximise recycling rates;
- Objective 7.3: Reduce the environmental impact of waste activities; and
- Objective 7.4: Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.

**5.28** The Environment Strategy seeks to reduce reliance on landfill and incineration by working towards a 'circular economy'. This radical change in dealing with London's waste will include:

- significantly cutting waste that is produced, with a focus on single use plastics and food waste;
- encouraging greater reuse of materials to minimise the use of virgin resources, including accelerating the take up of business models that promote the circular economy;
- once waste reduction and reuse opportunities have been exhausted, maximising the recycling of materials (including anaerobic digestion) that are left from our homes and businesses;
- where all opportunities to reduce, reuse and recycle materials have been exhausted, maximising the value of truly non-recyclable waste by generating low carbon energy from it to limit the environmental impact, and leave very little waste going to landfill; and
- ensuring that there is sufficient infrastructure in London to support the shift to a circular approach, helping to create opportunities for businesses developing reuse, repair and remanufacturing services

**5.29** Updated targets for recycling are set out which are due to be taken forward in the new London Plan due for publication later in 2020:

- no biodegradable or recyclable waste to landfill by 2026; and
- 65% of 'municipal' (household and business) waste recycled by 2030, comprising 50% LACW recycled by 2025; and 75% business recycled by 2030.

**5.30** Importantly, modelling undertaken on behalf of the Mayor suggests that if London achieves the reduction and recycling targets set out in the Environment Strategy, it will have sufficient energy from waste (EFW) capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational (see Objective 7.4). :

#### London Plan 2016

**5.31** The London Plan (GLA, March 2016) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan. Land to manage borough apportionments should be brought forward through protecting and facilitating the maximum use of existing waste sites. Boroughs are encouraged to collaborate by pooling their apportionment requirements.

**5.32** As shown below in Table 5.1, the current apportionment target for the four South London boroughs by 2021 is 669,000 tpa.

**Table 5.1: London Plan 2016 apportionment targets for South London (tonnes per annum)**

	Apportionment 2021	Apportionment 2036
Croydon	199,000	247,000
Kingston	119,000	148,000
Merton	192,000	239,000
Sutton	159,000	198,000
<b>SLWP</b>	<b>669,000</b>	<b>832,000</b>

**5.33** Many of the waste targets in the current London Plan have been superseded by the London Environment Strategy (see above). For example, recycling targets for local authority collected waste (LACW) and commercial and industrial (C&I) waste have been pushed back from 2020 to 2025 and 2030 respectively.

#### Draft New London Plan 2020

**5.34** The Intend to Publish London Plan (GLA, December 2019) sets out the following revised targets waste which reflect those set out in the London Environment Strategy:

- the equivalent of 100% of London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

**5.35** New apportionment targets<sup>29</sup> for each borough are introduced in Table 9.2 under draft Policy SI8 on 'Waste Capacity and Net Self-Sufficiency' in order to meet the net self-sufficiency target for household and C&I waste. It can be seen from Table 5.2 that the combined apportionment targets for South London from 2021 to 2041 are higher than those set by the current London Plan 2016.

**Table 5.2: Intend to Publish London Plan 2019 apportionment targets for South London (tpa)**

	Apportionment 2021	Apportionment 2041
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
<b>SLWP</b>	<b>887,000</b>	<b>944,000</b>

**5.36** Draft London Plan Policy SI8 has been updated to align with the NPPW approach to identifying sites and/or areas to meet identified waste management need. In addition, the definition of managed waste has been extended to include the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum. This increases the amount of existing capacity which counts towards managing apportioned waste.

**5.37** The supporting text to draft Policy SI8 makes clear that boroughs are expected to identify suitable additional capacity for those waste streams not apportioned by the London Plan, where practicable.

#### London Infrastructure Plan (update 2015)<sup>30</sup>

**5.38** The London Infrastructure Plan 2015 'Moving from waste to reuse' seeks to move away from the 'take-make-dispose' economy towards a more sustainable future where goods are designed to be reused and recycled as part of the so-called circular economy. The plan sets out a commitment to embedding circular economy principles across all areas of infrastructure delivery in London.

**5.39** The GLA and the London Water and Recycling Board (LWARB) have developed a Route Map for London's transition to a circular economy<sup>31</sup>. This identifies the need for London's waste authorities,

<sup>29</sup> the evidence base underlying the revised apportionments are set out in 'Forecasts for Household and C&I Waste: Report 1' (SLR, March 2017) (NLP/SI/003) at [https://www.london.gov.uk/sites/default/files/forecasts\\_for\\_household\\_and\\_commercial\\_industrial\\_waste\\_report\\_1\\_-\\_gla\\_waste\\_arisings\\_model.pdf](https://www.london.gov.uk/sites/default/files/forecasts_for_household_and_commercial_industrial_waste_report_1_-_gla_waste_arisings_model.pdf)

<sup>30</sup> the London Infrastructure Plan 2015 is available at

[file:///civvmi\\_vnas07/MyDocs/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20\(1\).pdf](file:///civvmi_vnas07/MyDocs/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20(1).pdf)

<sup>31</sup> LWARB Circular Economy Route map at <https://www.lwarb.gov.uk/what-we-do/circular-london/circular-economy-route-map/>

with assistance from the LWARB, to introduce more consistent collection and recycling services that will help to increase the capture of materials from individuals and businesses. Improved waste collection is needed, both under the current system and to support the circular economy. Circular economy principles can also be promoted by designing waste out of manufactured products, so that they can be disassembled and reused with the minimum of effort and energy.

**5.40** The estimated economic benefits of accelerating London's move to a circular economy include:

- reduced costs of up to £5 billion from 2016 to 2050;
- a new economic sector bringing employment opportunities and sparking innovation;
- the increased ability of industry to hedge its exposure to global commodity price volatility and supply disruption by reusing waste materials ;
- reduced toxic waste;
- reduced wider impacts, for example on transport. With a move to a circular economy, London is likely to require much less waste disposal infrastructure by 2050; and
- around 40 new facilities in addition to London's existing capacity. Most of them will be required to help reuse and recycle materials, predominantly repair workshops, disassembly lines and recycling and reprocessing facilities.

**5.41** The move towards a circular economy is already underway across London, with many companies already prospering as a result of it. It is clear that for companies to reuse resource inputs to the maximum degree, they need to increase the rate at which their products and components are collected and reused with materials recovered.

#### The Mayor's Sustainable Design and Construction SPG

**5.42** The Mayor's supplementary planning guidance (SPG) on 'Sustainable Design and Construction' (GLA, 2014)<sup>32</sup> sets out best practice guidance on circular economy principles aimed at reducing waste, increasing recovery from demolition materials, maximising pre-fabricated elements and providing sufficient space for storing recyclables and residual waste ready for collection. This will be superseded upon adoption of the New London Plan and the Mayor's Circular Economy Statement.

#### The Mayor's Municipal Waste Management Strategy 2011

**5.43** The Mayor's Municipal Waste Management Strategy<sup>33</sup> (GLA, 2011) was produced by the previous Mayor and has been replaced by the London Environment Strategy 2017.

#### The Greater London Historic Environment Record

**5.44** The Greater London Historic Environment Record (GLHER) provides some of the most up-to-date information on London's historic environment.

## Local context

#### South London Waste Plan 2012

**5.45** The South London Waste Plan (SLWP) (March 2012) sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within the four partner boroughs until 2022. It identifies 27 existing permitted facilities, 11 industrial areas suitable for new waste facilities and sets out policies for determining planning applications relating to waste facilities. The SLWP forms part of the local development plan for each of the partner boroughs.

<sup>32</sup> [https://www.london.gov.uk/sites/default/files/qla\\_migrate\\_files\\_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf](https://www.london.gov.uk/sites/default/files/qla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf)

<sup>33</sup> the Mayor's Municipal Waste Management Strategy 2011 is available at <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-municipal-waste-management-strategy>

**5.46** The current SLWP plan period is now coming to an end and a new waste plan for south London is required in order to meet the updated apportionment and new waste management targets set out in both the draft new London Plan and the London Environment Strategy (see above).

#### South London Waste Partnership Joint Municipal Waste Strategy (2011)

**5.47** The South London Waste Partnership is the disposal authority for household waste collected by the South London Boroughs. The Partnership's Joint Municipal Waste Strategy (2011) is a statement of intent to guide the authorities in undertaking their individual waste management activities. It covers the period from 2010 to 2020 and includes a strategic goal, objectives and a number of measurable targets.

#### London Borough of Croydon

**5.48** Policy SP6 of Croydon's Local Plan (February 2018) identifies the current SLWP as the key delivery vehicle for waste planning and commits to working in partnership with Kingston, Merton and Sutton to plan for waste across the South London area. Strategic Objective 9 seeks to ensure the responsible use of land and natural resources and management of waste in order to mitigate and adapt to climate change. Policy DM13 requires developers to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design.

#### Royal Borough of Kingston-upon-Thames

**5.49** Policy CS9 of Kingston's Core Strategy (April 2012) sets out strategic waste management priorities and targets for the borough and commits to working in partnership with Croydon, Merton and Sutton to plan for waste across the South London area. Core Strategy Objective 4 seeks to promote sustainable waste management within the four-borough waste partnership by preparing a Joint Waste Plan to identify suitable waste management sites to meet the London Plan apportionment, safeguard existing sites and set out appropriate planning policies to ensure high standards of development.

#### London Borough of Merton

**5.50** Policy CS17 of Merton's Core Planning Strategy (July 2011) sets out strategic priorities and targets for the borough and commits to working in partnership with Croydon, Kingston and Sutton to plan for waste across the South London area. Strategic Policy 1 seeks to apply the waste hierarchy and exploit opportunities to utilise energy from waste.

**5.51** Merton's emerging (Stage 2) Local Plan (October 2018) includes an updated strategic policy which identifies the SLWP as the key delivery vehicle for waste planning. Strategic Objective 4 aims to apply the waste hierarchy and exploit opportunities to utilise energy from waste. Policies CC8.10 and CC8.15 both include a commitment to support the principles of the circular economy.

#### London Borough of Sutton

**5.52** Sutton's Local Plan (February 2018) does not include a specific policy for waste, but instead defers to the current SLWP in the supporting text for Policy 14 on 'Industrial Land'.

**5.53** Policy 15 states that the council will support proposals from green business where they are suitable for the location proposed.





## 6. Baseline (Task A2)

### What is baseline information?

**6.1** The term 'baseline information' refers to the existing environmental, economic and social characteristics of the plan area, and their likely direction of change without any change to current planning policies. The information set out in this chapter has been used as part of the scoping process as the basis for identifying the key issues and problems to be addressed by the new South London Waste Plan (SLWP) (Section 7) and for developing the proposed SA Framework as the basis for assessing the likely impacts of alternative policy options on the social, economic and environmental objectives of sustainable development (Section 8).

**6.2** The revised NPPF (MHCLG, 2019) emphasizes that an up-to-date evidence base is essential for producing a sound development plan document (DPD). The environmental, social and economic baseline set out below is therefore derived from the following sources:

- Authority Monitoring Reports (AMRs) for 2018-19 prepared by the respective boroughs;
- studies undertaken by the four boroughs or by consultants as part of the evidence base for the Local Plan including employment land reviews, open space studies, infrastructure studies and Strategic Flood Risk Assessment (SFRA);
- studies undertaken by the GLA or by consultants as part of the evidence base for the new London Plan, including the London Industrial Land Demand Study (CAG, 2017);
- the London Employment Sites database;
- development monitoring data via the London Development Database;
- socio-economic and environmental information from the GLA London Datastore, including borough population and household projections; and
- mid-year estimates and population data from the Office for National Statistics.

**6.3** This chapter provides a summary of the current baseline situation in terms of the key environmental, social and economic trends likely to be affected by the new plan.

### The Plan Area

**6.4** The South London Waste Plan area, consisting of the four boroughs of Kingston-upon-Thames, Sutton, Merton and Croydon, is shown in Figure 6.1. While there are pockets of social deprivation, the area as a whole is relatively prosperous and noted for its high environmental quality.

**6.5** According to the latest mid-year estimates published by the Office of National Statistics (ONS) in 2019, the combined population of the four SLWP boroughs reached a total of 971,527 in mid 2018, representing an increase of 58,250 (+6.4%) since the 2011 Census. According to the GLA's housing-led projections<sup>34</sup>, updated in February 2020, this population is expected to increase by 100,167 or +10.1% from a total of 988,295 in 2021 to 1,088,462 by 2036.

**6.6** In terms of the future spatial development of the four partner boroughs, the draft new London Plan identifies Opportunity Areas centred upon each of the three Metropolitan Centres of Croydon, Sutton and Kingston together with a further Opportunity Area at Wimbledon/ Colliers Wood/ South Wimbledon. Each of these areas of change is expected to be a focus for significant growth and economic regeneration over the lifetime of the plan to 2041. However the ability of these Opportunity

<sup>34</sup> the GLA's latest housing-led population (2018-based) population projections are available at <https://data.london.gov.uk/dataset/housing-led-population-projections>

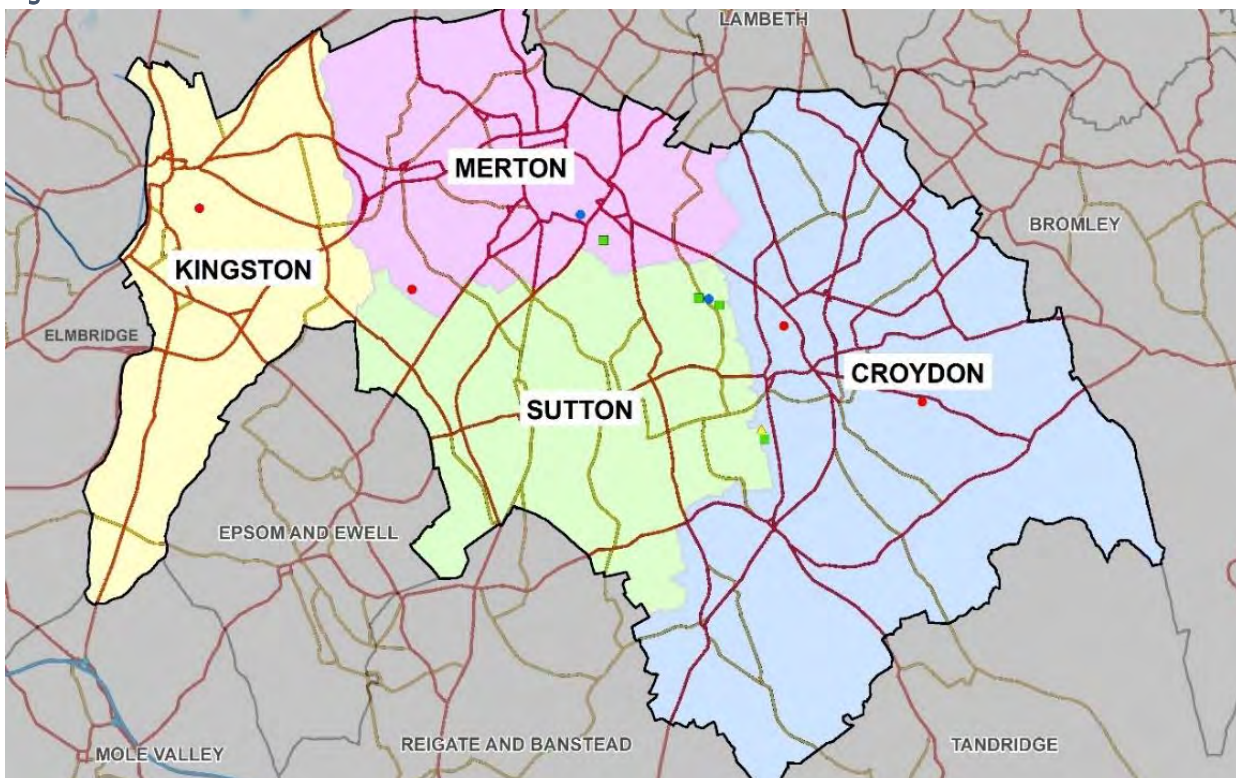
Area areas to accommodate the additional housing and jobs needed over the coming decades will require major investment in strategic transport infrastructure, namely Crossrail 2 and the Tramlink extension.

**6.7** The importance of Tramlink as one of the Mayor's Strategic Infrastructure Priorities is reflected in the Key Diagram of the draft new London Plan which identifies Croydon, Sutton and Wimbledon town centres as key elements of the 'Trams Triangle'. Tramlink has already transformed travel opportunities within South London and the proposal to extend the tram to Sutton Town Centre and potentially beyond to the proposed London Cancer Hub (LCH) provides the potential for improving transport accessibility to the town centre and supporting the delivery of additional homes and jobs. The 'Trams Triangle' provides important links to central London and Gatwick via the Brighton mainline and, in the future, Crossrail 2. There are also important links to the east and west, where improved transport connections to Heathrow will be beneficial for places to the west of South West London

**6.8** The plan area contains a total of 780 ha of designated industrial land, including 10 Strategic Industrial Locations (SILs), as well as numerous smaller sites. As of 2017, 35 ha of this land (4.5%) was vacant. Many businesses, particularly in the Wandle Valley, are in a supply-chain relationship with the central London economy. Although development opportunities in outer London tend to be concentrated in the town centres and are smaller by comparison with Inner London boroughs, the Wandle Valley corridor offers diverse regeneration potential, including the Wimbledon/ Colliers Wood/ South Wimbledon Opportunity Area. There is also a Strategic Office Location at Croydon Town Centre.

**6.9** There is a total of 3,439 ha of green belt and 2,458 ha of Metropolitan Open Land (MOL) in the plan area. This accounts for 28.7% of the land area of the four boroughs.

**Figure 6.1: The South London Waste Plan Area.**



## London Borough of Croydon

**6.10** The London Borough of Croydon has an area of 8,650 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Croydon reached a total of 383,838 in mid 2018.

**6.11** There is a total of 163.0 ha of designated industrial land within the borough, of which 9.6 ha (5.9%) is currently vacant. There are two Strategic Industrial Locations (SILs) at Marlpit Lane and Imperial Way/ Purley Way, accounting for 118.6 ha.

**6.12** With over 380 retail outlets, Croydon Town Centre is one of four Metropolitan Centres in South London, and has been identified as both an Opportunity Area and a Strategic Office Location in the draft new London Plan. Croydon Town Centre is supported by nine district centres at Addiscombe, Coulsdon, New Addington, Norbury, Purley, Selsdon, South Norwood, Thornton Heath, Upper Norwood/ Crystal Palace.

**6.13** Croydon is well located near to Gatwick Airport and within easy reach of central London and the south coast.

**6.14** Croydon has 2,195 ha of Green Belt and 413 ha of MOL, together accounting for 30.2% of the land area of the borough.

## Royal Borough of Kingston-upon-Thames

**6.15** The Royal Borough of Kingston-upon-Thames has an area of 3,726 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Kingston reached a total of 174,978 in mid 2018. Kingston's predominant character is of leafy suburbs with relatively low density development of two or three-storey houses with gardens, though there are some higher density neighbourhoods, mainly around Kingston and Surbiton town centres and along major roads.

**6.16** Kingston Town Centre is a Metropolitan Centre and identified as an Opportunity Area in the draft new London Plan. There are three district centres: New Malden in the east, Surbiton just south of Kingston, and Tolworth close to the A3. The council has identified four areas where there is scope for accommodating additional growth, at Kingston Town Centre; Norbiton, London Road and Cambridge Estate; New Malden and Tolworth.. However, with the introduction of Crossrail 2 is operational, the borough is expected to benefit from more Crossrail 2 stations than any other and the arrival of the new, higher frequency, higher capacity service will enable significant additional growth opportunities in these areas. It will improve Kingston's attractiveness as an office location and therefore support additional commercial growth in the town centre, building on links with Kingston University and Kingston College.

## London Borough of Merton

**6.17** Merton is the one of the smallest boroughs in London with an area of 3,762 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Merton reached a total of 210,327 in mid 2018.

**6.18** Crossrail 2 and associated investment are expected to have a significant impact on the future regeneration and growth of Merton. This will help support the delivery of housing, mixed-use and commercial development across the borough and the opportunity areas located within it. The step change in transport capacity and connectivity offered by Crossrail 2 is expected to transform

Wimbledon into a major transport hub with opportunities for interchange with National Rail, trams and the Underground.

**6.19** The redevelopment required to deliver the Crossrail 2 tunnel offers the opportunity to plan for significant growth and intensification, with residential and commercial development. Crossrail 2 will strengthen Wimbledon's role as a 'major town centre', and as a location with potential for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres.

**6.20** Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 18% of the borough's area is open space, compared to the 10% London average. The quality and historical character of the borough reflects the number of high quality heritage areas designated as Conservation Areas.

## London Borough of Sutton

**6.21** The London Borough of Sutton (4,485 ha) forms an important part of the Wandle Valley, one of three growth corridors identified as having 'city region importance' in the current London Plan 2016. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Sutton reached a total of 204,775 in mid-2018.

**6.22** Industrial activity is concentrated in the Borough's established industrial areas, three of which are identified as strategic industrial locations (SILs). These are Kimpton, Beddington and a small part of the Purley Way SIL. Each of these is served by key radial routes into London from the M25. Elsewhere, a number of smaller industrial sites are being transformed in housing developments, for example the Felnex Trading Estate and Wandle Valley Trading Estate in Hackbridge

**6.23** Sutton Town Centre is one of four Metropolitan Centres in South London and an Opportunity Area in the draft new London Plan. The town centre has 188 retail units within an attractive pedestrianised environment. Sutton Town Centre is complemented by seven district centres, at Cheam, North Cheam, Wallington, Worcester Park, Hackbridge, Rosehill and Carshalton, along with many local centres and dispersed parades.

**6.24** Sutton has a number of high quality heritage areas designated as Conservation Areas and Areas of Special Local Character (ASLCs). In contrast, there are pockets of relative social deprivation, characterised by limited access to employment, social infrastructure and transport services, including areas to the north of the Borough, such as Rosehill, St Helier and the Wrythe, and parts of South Beddington.

## POPULATION

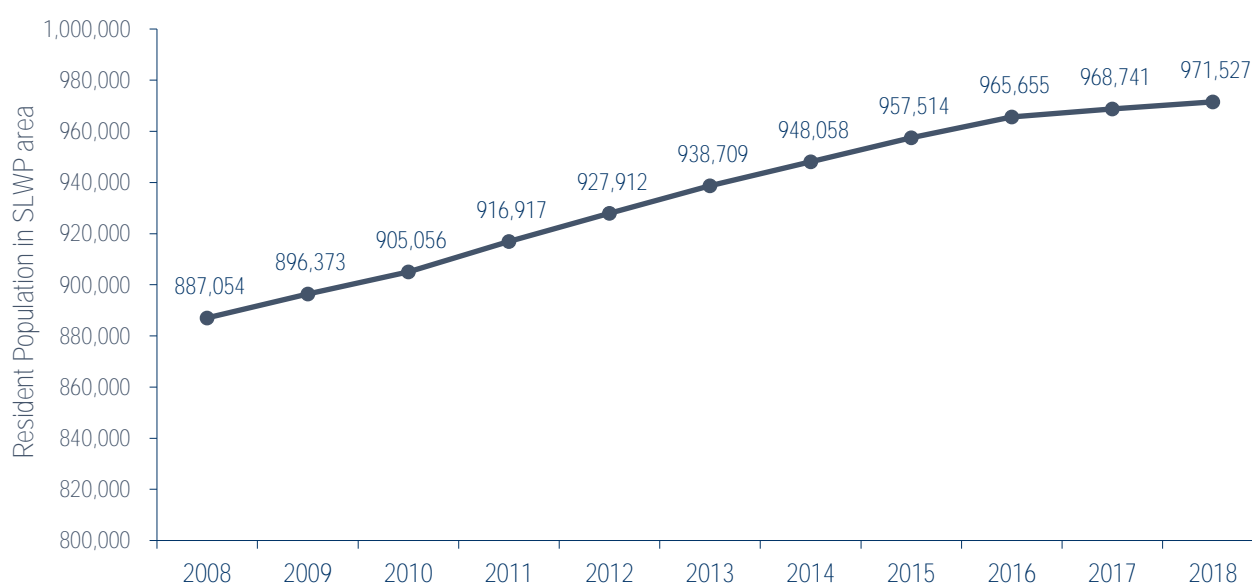
### Resident population

Table 6.1: Resident Population for SLWP boroughs and plan area

	Population mid-2017	Population mid-2018	Births
Croydon	384,837	385,346	+5,582
Kingston	174,609	175,470	+2,089
Merton	206,052	206,186	+3,160
Sutton	203,243	204,525	+2,533
<b>SLWP</b>	<b>968,741</b>	<b>971,527</b>	<b>+13,364</b>

Source: ONS Mid-Year Estimates (26 June 2019)

Figure 6.2: Population growth in the SLWP area 2008-18



### Components of population change 2017 to 2018

Table 6.2: Components of population change for SLWP boroughs and the plan area

	Population mid-2017	Population mid-2018	Births	Deaths	Net Migration	Overall Net change
Croydon	384,837	385,346	+5,582	-2,564	-2,509	<b>+509</b>
Kingston	174,609	175,470	+2,089	-1,108	-120	<b>+861</b>
Merton	206,052	206,186	+3,160	-1,287	-1,739	<b>+134</b>
Sutton	203,243	204,525	+2,533	-1,545	294	<b>+1,282</b>
<b>SLWP</b>	<b>968,741</b>	<b>971,527</b>	<b>+13,364</b>	<b>-6,504</b>	<b>-4,074</b>	<b>+2,786</b>

Source: ONS Mid-Year Estimates (26 June 2019)



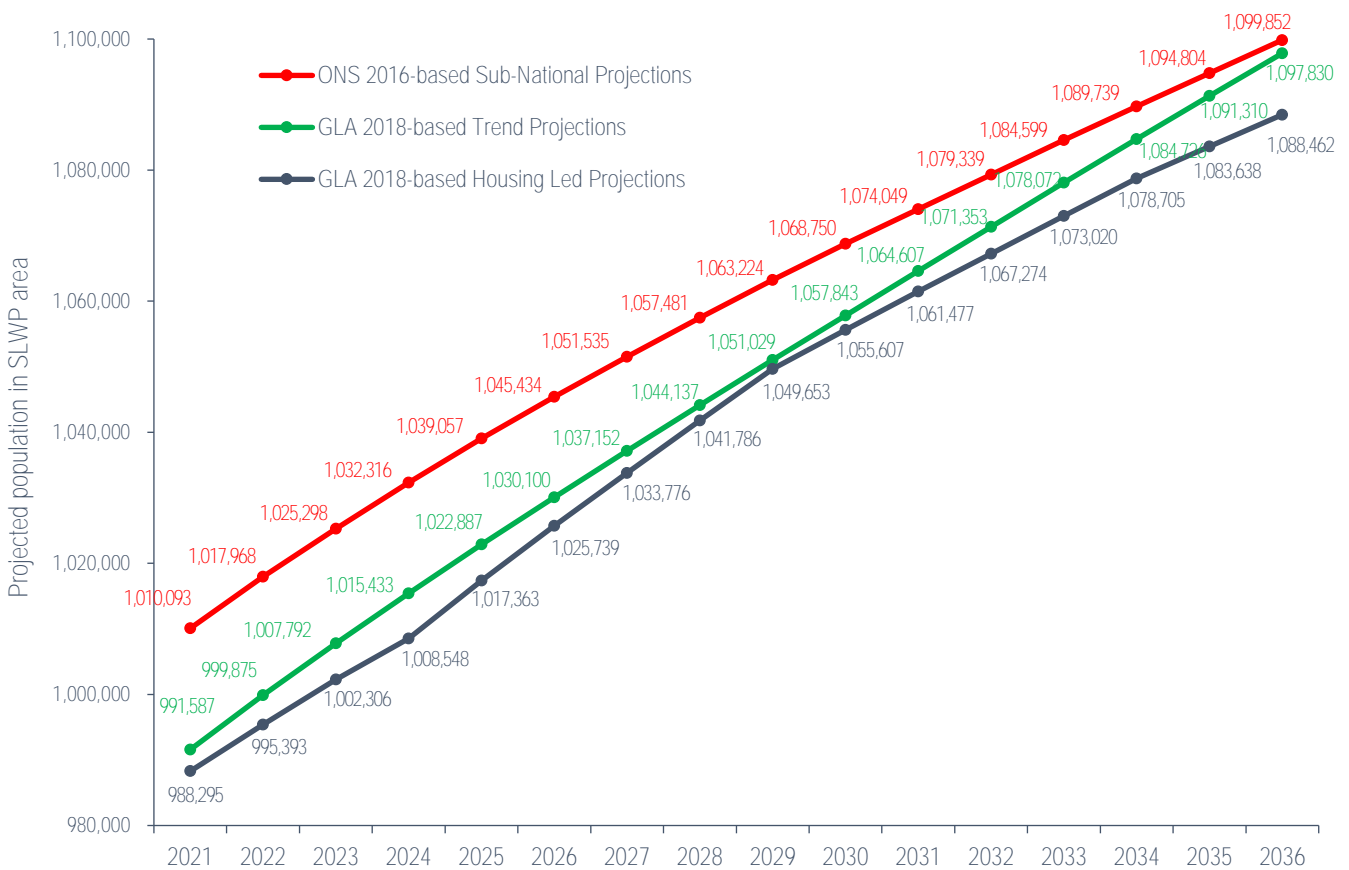
## Population projections

Table 6.3: Population projections for SLWP boroughs and plan area 2021-36

	Population Projections								
	GLA 2018-based Housing Led <sup>35</sup>			GLA 2018-based Central Trend <sup>36</sup>			ONS 2016-based Subnational Projections		
	2021	2036	Change	2021	2036	Change	2021	2036	Change
Croydon	391,463	436,023	+44,560 (+11.4%)	389,681	427,936	+38,255 (+9.8%)	400,227	436,252	+36,024 (+9.0%)
Kingston	177,502	206,226	+28,724 (+16.2%)	178,748	200,221	+21,473 (+12%)	185,017	205,061	+20,045 (+10.8%)
Merton	212,413	229,298	+16,885 (+7.95%)	214,549	237,457	+22,908 (+10.7%)	212,915	225,972	+13,057 (+6.1%)
Sutton	206,917	216,915	+9,998 (+4.8%)	208,609	232,216	+23,607 (+13.0%)	211,933	232,566	+20,633 (+9.7%)
<b>SLWP</b>	<b>988,295</b>	<b>1,088,462</b>	<b>+100,167</b> (+10.1%)	<b>991,587</b>	<b>1,097,830</b>	<b>+106,243</b> (+11.3%)	<b>1,010,093</b>	<b>1,099,852</b>	<b>+89,759</b> (+8.9%)

Sources: GLA 2018-based Trend Projections; GLA 2018-based Housing Led Projections (both updated Feb 2020); and ONS 2016-based Population Projections

Figure 6.3: Population projections for SLWP boroughs and plan area 2021-36



Sources: GLA 2016-based Trend; GLA 2016-based Housing-Led; and ONS 2016-based population projections

<sup>35</sup> GLA 2018-based housing-led projections incorporating the 2016 Strategic Housing Land Availability Assessment (SHLAA) at <https://data.london.gov.uk/dataset/housing-led-population-projections>

<sup>36</sup> GLA 2018-based central trend population projections are available on the London Datastore at <https://data.london.gov.uk/dataset/trend-based-population-projections>

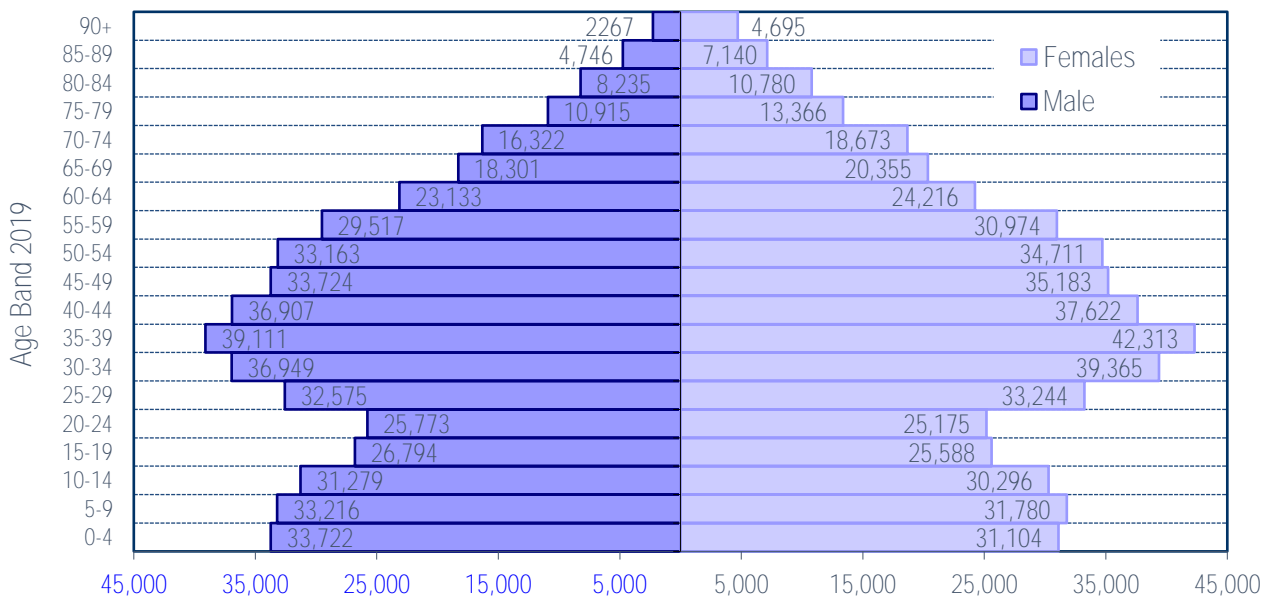
## Population structure

Table 6.4: Population structure for SLWP boroughs and plan area 2019

Resident Population 2019				
	Age band	Males	Females	All persons
Croydon	Borough residents aged 0-15	42,104 (22.6%)	40,478 (20.5%)	<b>82,582 (21.5%)</b>
	Borough residents aged 16-64	120,450 (64.6%)	127,654 (64.7%)	<b>248,104 (64.6%)</b>
	Borough residents aged 65+	23,865 (12.8%)	29,287 (14.8%)	<b>53,152 (13.9%)</b>
	<b>Total</b>	<b>186,419</b>	<b>197,419</b>	<b>383,838</b>
Kingston	Borough residents aged 0-15	16,801 (19.4%)	16,488 (18.6%)	<b>33,289 (19%)</b>
	Borough residents aged 16-64	58,605 (67.8%)	58,416 (66%)	<b>117,021 (66.9%)</b>
	Borough residents aged 65+	11,099 (12.8%)	13,571 (15.4%)	<b>24,670 (14.1%)</b>
	<b>Total</b>	<b>86,505</b>	<b>88,475</b>	<b>174,980</b>
Merton	Borough residents aged 0-15	23,074 (23.8%)	21,844 (20.5%)	<b>44,918 (22.1%)</b>
	Borough residents aged 16-64	62,029 (64.1%)	70,046 (65.8%)	<b>132,075 (65%)</b>
	Borough residents aged 65+	11,739 (12.1%)	14,595 (13.7%)	<b>26,334 (12.9%)</b>
	<b>Total</b>	<b>96,842</b>	<b>106,485</b>	<b>203,327</b>
Sutton	Borough residents aged 0-15	21,983 (22%)	20,688 (19.7%)	<b>42,671 (20.8%)</b>
	Borough residents aged 16-64	63,817 (63.9%)	66,668 (63.6%)	<b>130,485 (63.7%)</b>
	Borough residents aged 65+	14,084 (14.1%)	17,535 (16.7%)	<b>31,619 (15.5%)</b>
	<b>Total</b>	<b>99,884</b>	<b>104,891</b>	<b>204,775</b>
SLWP area	Residents aged 0-15	103,962 (22.2%)	99,498 (20%)	<b>203,460 (21%)</b>
	Residents aged 16-64	304,901 (64.9%)	322,784 (65%)	<b>627,685 (65%)</b>
	Residents aged 65+	60,787 (12.9%)	74,988 (15%)	<b>135,775 (14%)</b>
	<b>Total</b>	<b>469,650</b>	<b>497,270</b>	<b>966,920</b>

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 6.4: Population structure by gender and age band for the plan area 2019



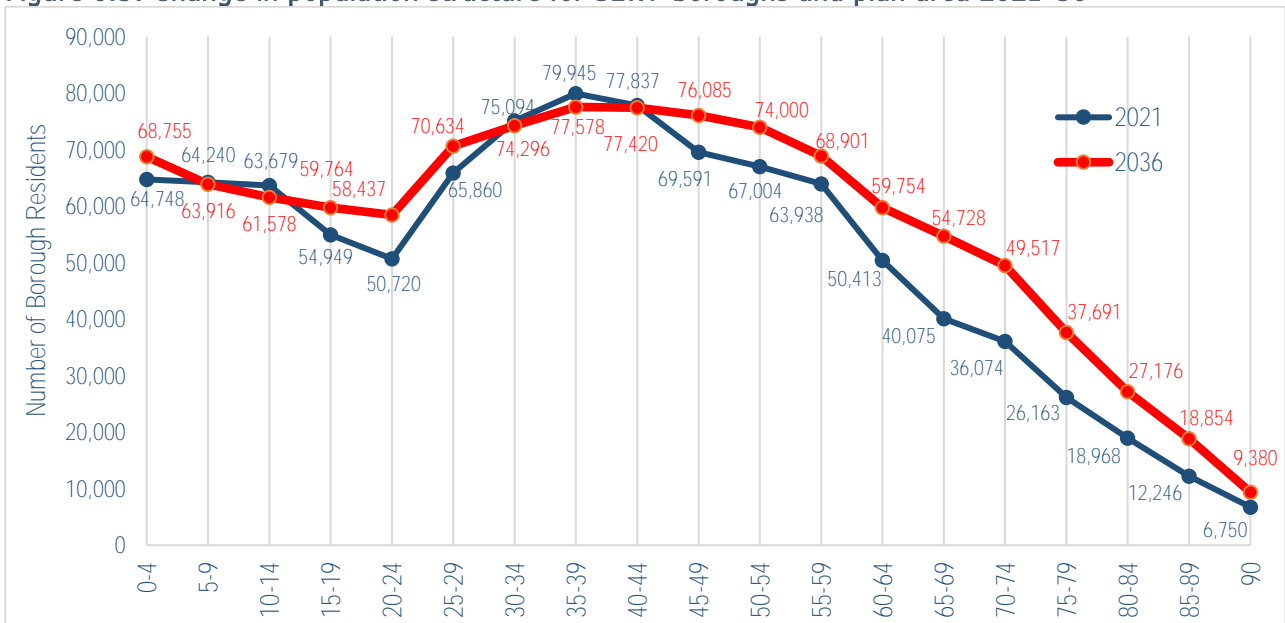
## Projected Change in Population Structure

Table 6.5: Change in population structure for SLWP boroughs and plan area 2021-36

Resident Population				
	Age band	All persons 2021	All persons 2036	Projected change
Croydon	Borough residents aged 0-15	82,921	84,572	+1,651 (+2%)
	Borough residents aged 16-64	253,102	270,057	+16,955 (+6.7%)
	Borough residents aged 65+	55,440	81,394	+25,954 (+46.8%)
	<b>Total</b>	<b>391,463</b>	<b>436,023</b>	<b>+44,560 (+11.4%)</b>
Kingston	Borough residents aged 0-15	33,463	35,196	+1,733 (+5.2%)
	Borough residents aged 16-64	118,660	134,831	+16,171 (+13.6%)
	Borough residents aged 65+	25,379	36,198	+10,819 (+42.6%)
	<b>Total</b>	<b>177,502</b>	<b>206,225</b>	<b>+28,723 (+16.2%)</b>
Merton	Borough residents aged 0-15	44,945	44,476	-469 (-1%)
	Borough residents aged 16-64	140,434	148,264	+7,830 (+5.6%)
	Borough residents aged 65+	27,034	36,558	+9,524 (+35.2%)
	<b>Total</b>	<b>212,413</b>	<b>229,298</b>	<b>+16885 (+7.9%)</b>
Sutton	Borough residents aged 0-15	43,230	42,325	-905 (-2.1%)
	Borough residents aged 16-64	131,263	131,393	+130 (+0.1%)
	Borough residents aged 65+	32,423	43,196	+10,773 (+33.2%)
	<b>Total</b>	<b>206,916</b>	<b>216,914</b>	<b>+9,998 (+4.8%)</b>
SLWP area	Residents aged 0-15	204,559	206,569	+2,010 (+1%)
	Residents aged 16-64	643,459	684,545	+41,086 (+6.4%)
	Residents aged 65+	140,276	197,346	+57,070 (+40.7%)
	<b>Total</b>	<b>988,294</b>	<b>1,088,460</b>	<b>+100,166 (+10.1%)</b>

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 6.5: Change in population structure for SLWP boroughs and plan area 2021-36



## Population density

Table 6.6: Population density

	Population mid-2018	Area (ha)	Population density (residents/ha)
Croydon	385,346	8,650	44.5
Kingston	175,470	3,726	47.1
Merton	206,186	3,762	54.8
Sutton	204,525	4,385	46.6
<b>SLWP</b>	<b>971,527</b>	<b>20,523</b>	<b>47.3</b>
London	8,908,081	159,471	55.9

Source: ONS Mid-Year Estimates (26 June 2019)

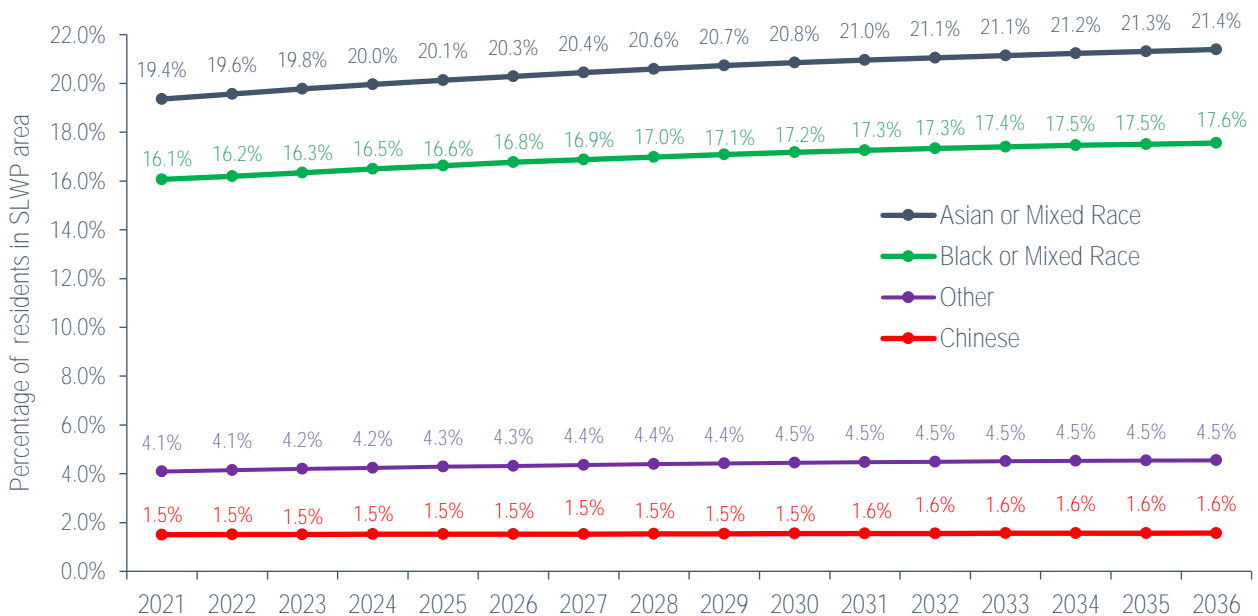
## Ethnicity

Table 6.7: Ethnic breakdown for SLWP boroughs and plan area 2019

	White	Black and Minority Ethnic (BAME)	Asian or Mixed Race	Black or Mixed Race	Other	Chinese
Croydon	188,737 (47.6%)	207,812 (52.4%)	76,805 (19.4%)	109,216 (27.5%)	16,762 (4.2%)	5,029 (1.3%)
Kingston	121,925 (67.5%)	58,673 (32.5%)	36,758 (20.4%)	8,292 (4.6%)	9,520 (5.3%)	4,104 (2.3%)
Merton	133,098 (63.2%)	77,354 (36.8%)	42,749 (20.3%)	24,124 (11.5%)	7,561 (3.6%)	2,920 (1.4%)
Sutton	153,461 (73.2%)	56,206 (26.8%)	31,975 (15.3%)	15,833 (7.6%)	5,686 (2.7%)	2,711 (1.3%)
<b>SLWP</b>	<b>597,221 (59.9%)</b>	<b>400,045 (40.1%)</b>	<b>188,287 (18.9%)</b>	<b>157,465 (15.8%)</b>	<b>39,529 (4.0%)</b>	<b>14,764 (1.5%)</b>
London	5,161,532 (56.7%)	3,944,624 (43.3%)	1,819,907 (20.0%)	1,442,062 (15.8%)	526,430 (5.8%)	156,224 (1.7%)

Source: GLA Housing-led Ethnic Projections (November 2017)

Figure 6.6: Projected ethnic breakdown for plan area 2021-36



## Religion

Table 6.8: Religion for SLWP boroughs and plan area 2019

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion
Croydon	49.3%	-	5.5%	-	8.8%	-	2.8%	33.6%
Kingston	41.9%	1.3%	6.1%	-	11.0%	-	2.2%	37.6%
Merton	51.7%	-	5.3%	-	6.1%	-	3.5%	33.3%
Sutton	48.8%	-	8.2%	-	7.3%	-	2.1%	33.6%
<b>SLWP</b>	<b>48.4%</b>	<b>0.2%</b>	<b>6.2%</b>	<b>0.0%</b>	<b>8.3%</b>	<b>0.0%</b>	<b>2.7%</b>	<b>34.3%</b>
London	44.5%	0.9%	5.2%	2.2%	14.2%	1.4%	2.3%	29.4%

Source: GLA Datastore – Annual Population Survey (June 2019)

## Household growth

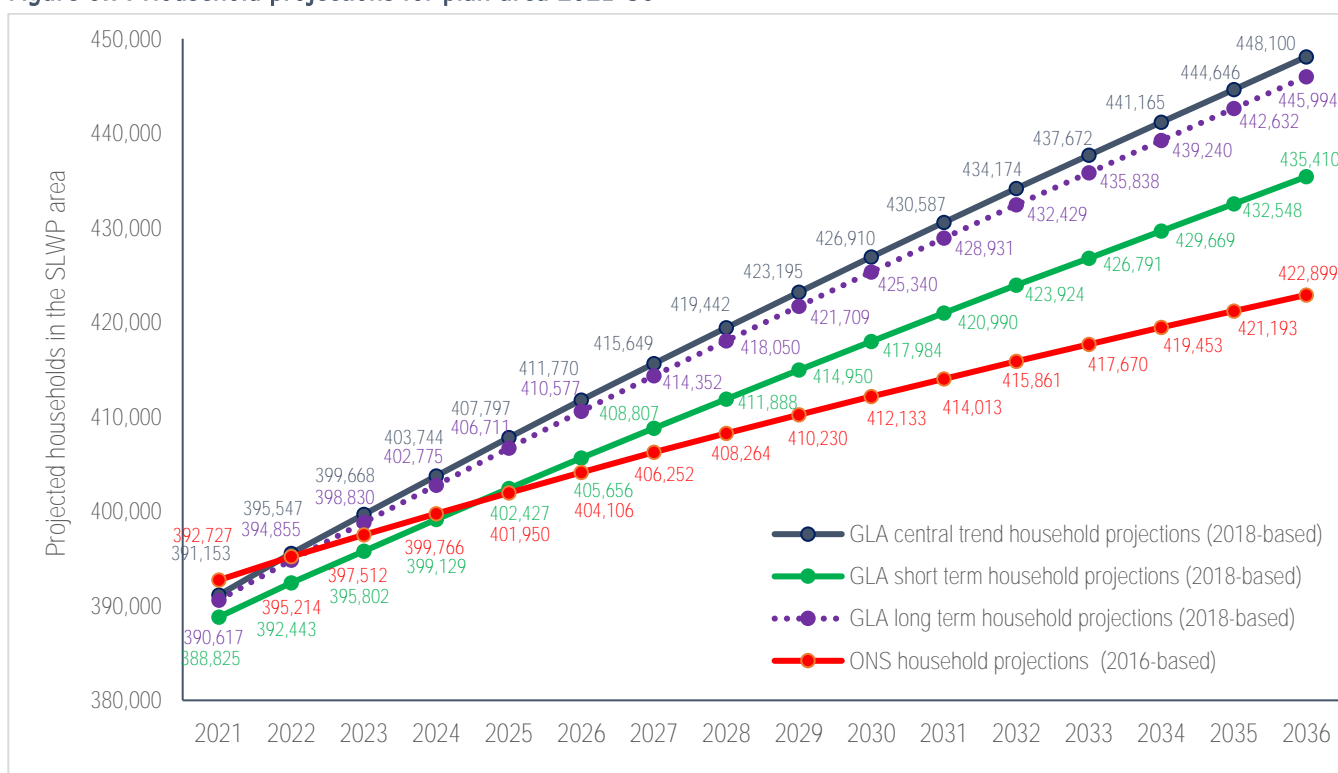
Table 6.9: Household growth within SLWP boroughs and plan area from 2011 to 2019

	Number of households		
	2011	2019	Change since 2011
Croydon	145,988	153,958	+7,970 (+5.5%)
Kingston	63,994	69,047	+5,053 (+7.9%)
Merton	79,157	80,188	+1,031 (+1.3%)
Sutton	78,661	82,820	+4,159 (+5.3%)
<b>SLWP</b>	<b>367,800</b>	<b>386,013</b>	<b>+18,213 (+5%)</b>

Sources: GLA Central Trend Projection 2018-based<sup>37</sup>

## Household projections 2021-36

Figure 6.7: Household projections for plan area 2021-36



<sup>37</sup> the 'central' trend projection informs the London Plan and is considered by the GLA to be the most appropriate for medium to long-term strategic planning. This model is based on past trends in births, deaths and migration to project future populations in London using 10-year average domestic migration rates, international migration in-flows and international out-migration rates



## Housing tenure by household

Table 6.10: Household tenure by household for SLWP boroughs and plan area

	Number of households				Total
	Own Outright	Mortgage	Rented from Council or Reg. Provider	Rented from private landlord	
Croydon	38,300 (26.2%)	54,100 (37%)	25,700 (17.6%)	28,200 (19.2%)	146,300
Kingston	21,800 (33.1%)	20,200 (30.6%)	6,200 (9.5%)	17,700 (26.9%)	65,900
Merton	23,400 (28.7%)	26,700 (32.8%)	10,200 (12.5%)	21,200 (26%)	81,500
Sutton	25,600 (32.8%)	28,400 (36.4%)	8,000 (10.3%)	16,000 (20.5%)	78,000
<b>SLWP</b>	<b>109,100 (29.3%)</b>	<b>129,400 (34.8%)</b>	<b>50,100 (13.5%)</b>	<b>83,100 (22.4%)</b>	<b>371,700</b>

Sources: ONS Annual Population Survey 2019

## Car ownership




Table 6.11: Household tenure by household for SLWP boroughs and plan area

	Cars	Households	Cars per household	London ranking (out of 33 boroughs)
Croydon	141,122	153,958	0.92	13 <sup>th</sup> (joint)
Kingston	66,239	69,047	0.96	8 <sup>th</sup> (joint)
Merton	70,113	80,188	0.87	16 <sup>th</sup>
Sutton	87,727	82,820	1.06	5 <sup>th</sup> (joint)
<b>SLWP</b>	<b>365,201</b>	<b>386,013</b>	<b>0.95</b>	<b>n/a</b>
<b>LONDON</b>	<b>2,661,026</b>	<b>3,553,413</b>	<b>0.75</b>	<b>n/a</b>

Source: DVLA/DfT: Number of Licensed Vehicles (VEH0105) April 2020, and GLA Household Projections Central Trend 2018-based (2019)




## Social deprivation

Table 6.12: Index of Multiple Deprivation (IMD 2019) - national ranking

	Social deprivation ranking compared to the 317 areas in England <sup>38</sup>		
	IMD 2015 <sup>39</sup>	IMD 2019	Change 2015-19
Croydon	95 <sup>th</sup>	<b>108<sup>th</sup> most deprived in England</b>	
Kingston	270 <sup>th</sup>	<b>273<sup>rd</sup> most deprived in England</b>	
Merton	209 <sup>th</sup>	<b>213<sup>th</sup> most deprived in England</b>	
Sutton	211 <sup>th</sup>	<b>226<sup>th</sup> most deprived in England</b>	

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 6.13: Index of Multiple Deprivation (IMD 2019) - London ranking

	Social deprivation ranking compared to the 33 London Boroughs		
	IMD 2015	IMD 2019	Change 2015-19
Croydon	17 <sup>th</sup>	<b>15<sup>th</sup> most deprived in London</b>	
Kingston	32 <sup>nd</sup>	<b>32<sup>nd</sup> most deprived in London</b>	No change
Merton	28 <sup>th</sup>	<b>29<sup>th</sup> most deprived in London</b>	
Sutton	29 <sup>th</sup>	<b>31<sup>st</sup> most deprived in London</b>	

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

<sup>38</sup> based on IMD 2019 'rank of average score' (1<sup>st</sup> = most deprived and 317<sup>th</sup> = least deprived)

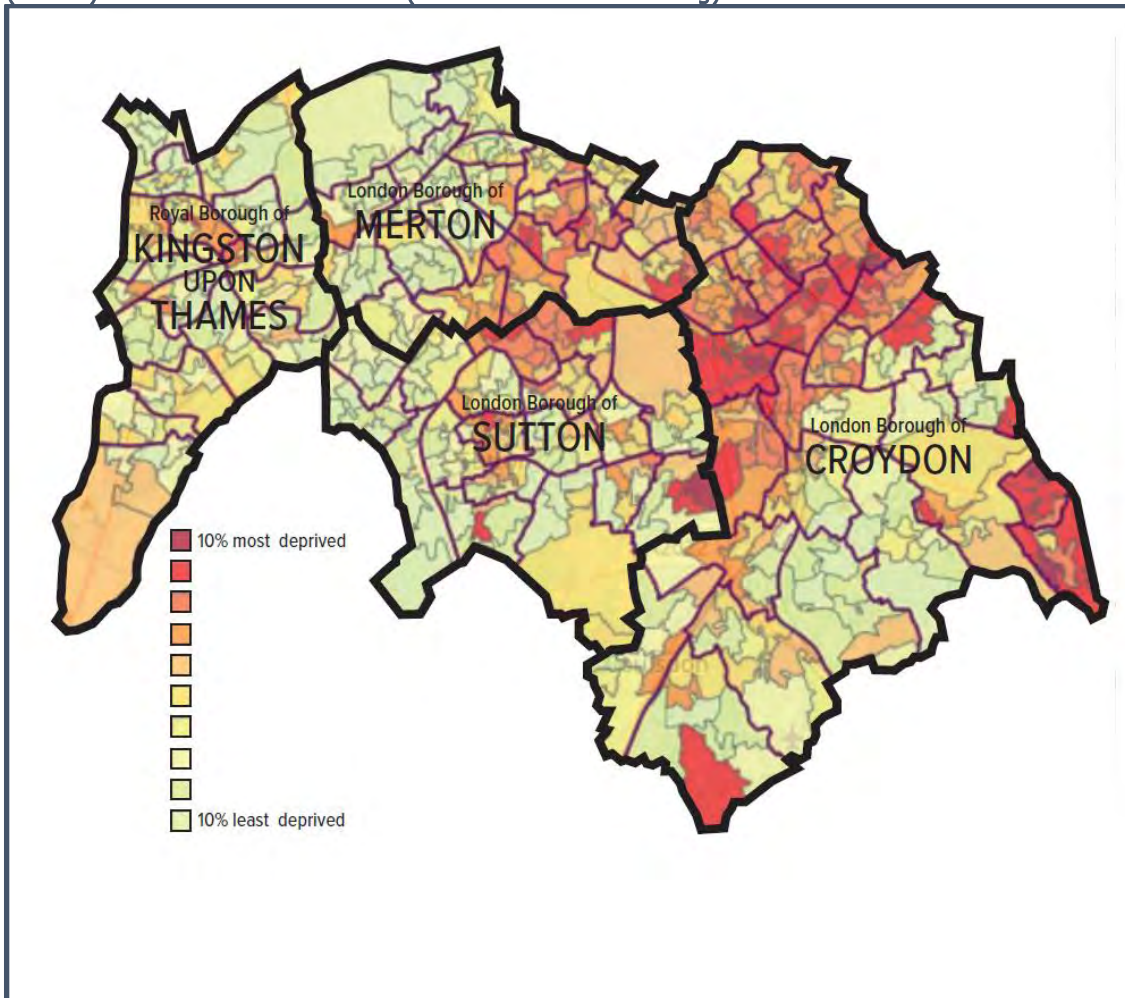
<sup>39</sup> 2015 data recast to 2019 lower tier (district) authorities following boundary changes

**Table 6.14: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England**

	IMD 2019 - Ranking of average score			
	LSOAs ranked in 10% most deprived	LSOAs ranked in 20% most deprived	LSOAs ranked in 10% least deprived	LSOAs ranked in 20% least deprived
Croydon	5	44	7	19
Kingston	0	1	13	38
Merton	0	3	22	41
Sutton	1	7	23	42

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

**Figure 6.8: Index of Multiple Deprivation (IMD 2015) map for SLWP area showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)**



## Fuel Poverty

**Table 6.15: Percentage of fuel poor households for SLWP boroughs and plan area**

	Households	Fuel Poor Households	Proportion of households who are fuel poor (%)
Croydon	152,205	17,108	11.2%
Kingston	66,817	6,955	10.4%
Merton	82,831	9,282	11.2%
Sutton	82,077	6,897	8.4%
<b>SLWP</b>	<b>383,930</b>	<b>40,242</b>	<b>10.5%</b>
LONDON	3,425,063	391,924	11.4%

Source: Sub-regional fuel poverty data, Department for Business, Energy & Industrial Strategy (BEIS) April 2020

## ECONOMY

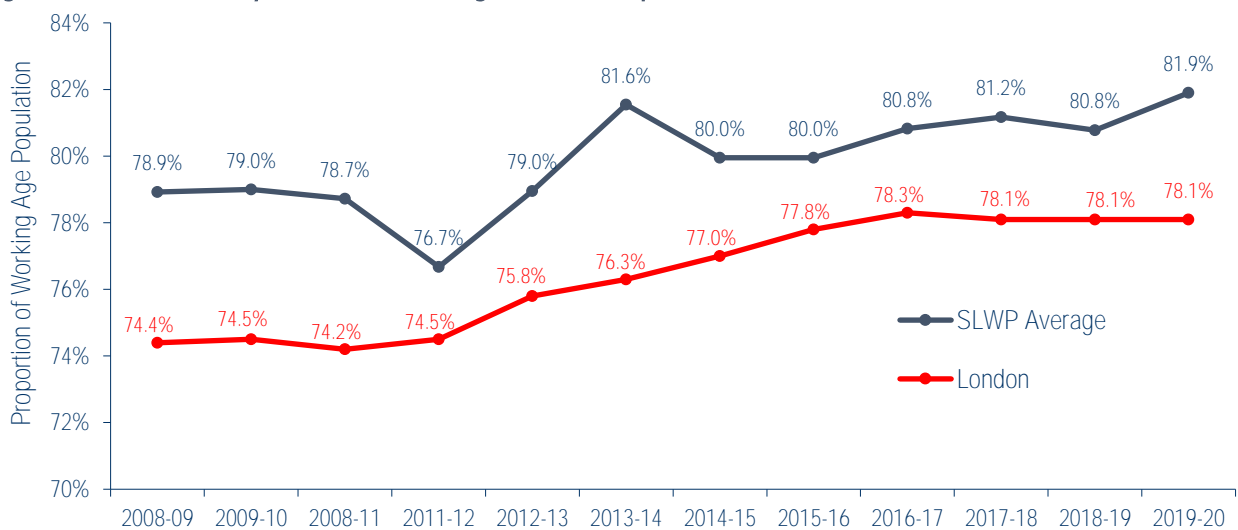
### Economic activity

Table 6.16: Proportion of working age population aged 16-64 who are economically active

	Residents of working age (16-64)	Residents of working age (16-64) who are economically active	Proportion of working age (16-64) residents who are economically active
Croydon	247,800	205,800	83.1%
Kingston	115,800	99,000	85.5%
Merton	137,000	119,800	87.4%
Sutton	130,000	113,500	87.3%
<b>SLWP</b>	<b>630,600</b>	<b>538,100</b>	<b>85.3%</b>
<b>LONDON</b>	<b>6,014,100</b>	<b>4,893,600</b>	<b>81.4%</b>

Source: NOMIS website on behalf of ONS April 2020

Figure 6.9: Economically active residents aged 16-64 for plan area 2008-09 to 2018-19



## Employment by occupation - economically active residents 16-64

Table 6.17: Employment by occupation for SLWP boroughs and plan area 2018-19

Occupation	Croydon	Kingston	Merton	Sutton	SLWP	LONDON
Managers and Senior Officials	11.7% (23,200)	18.1% (17,400)	14.5% (16,600)	10.5% (11,200)	<b>12.7%</b> <b>(68,400)</b>	13.5% (630,900)
Professional Occupations	22.4% (44,600)	28.1% (27,000)	24.5% (28,000)	24.1% (25,800)	<b>23.3%</b> <b>(125,400)</b>	26.5% (1,239,100)
Assc Professional & Technical	(31,900) 16.1%	19.7% (18,900)	18.8% (21,500)	(18,200) 17%	<b>16.8%</b> <b>90,500)</b>	(854,400) 18.3%
Administrative and Secretarial	10% (19,800)	9.8% (9,400)	12.1% (13,800)	11.5% (12,300)	<b>10.3%</b> <b>(55,300)</b>	15.8% (408,200)
Skilled Trades	8.7% (17,200)	7% (6,700)	7.8% (8,900)	11.1% (11,800)	<b>8.3%</b> <b>(44,600)</b>	(325,400) 7.0%
Personal service (e.g. caring)	9.1% (18,000)	5.4% (5,200)	6.9% (7,900)	8.3% (8,900)	<b>7.4%</b> <b>(40,000)</b>	7.1% (332,100)
Sales/ Customer Services	7% (13,900)	4.1% (3,900)	5.1% (5,900)	5.2% (5,600)	<b>5.4%</b> <b>(29,300)</b>	5.7% (271,700)
Plant & Machines Operatives	3.4% (6,800)	3.1% (2,800)	4.4% (5,000)	5.4% (5,800)	<b>3.8%</b> <b>(20,400)</b>	4.5% (208,700)
Elementary Occupations	10% (19,800)	5.8% (5,600)	5.9% (6,700)	6.6% (7,100)	<b>7.3%</b> <b>(39,200)</b>	8% (375,900)

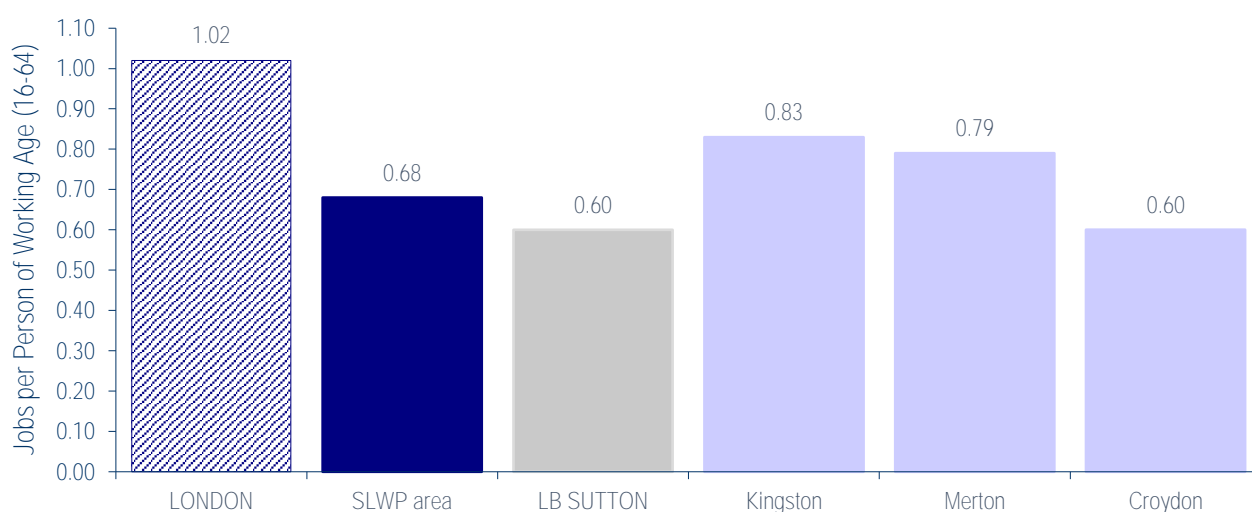
## Job Density

Table 6.18: Employee jobs per resident of working age (16-64) for SLWP boroughs 2018

	Employee Jobs (full-time and part-time)	Residents aged 16-64	Job Density (Jobs/resident)
Croydon	149,000	247,800	0.6
Kingston	96,000	115,800	0.83
Merton	108,000	137,000	0.79
Sutton	78,000	130,000	0.6
<b>SLWP</b>	<b>431,000</b>	<b>630,600</b>	<b>0.68</b>
<b>LONDON</b>	<b>6,149,000</b>	<b>4,893,600</b>	<b>1.02</b>

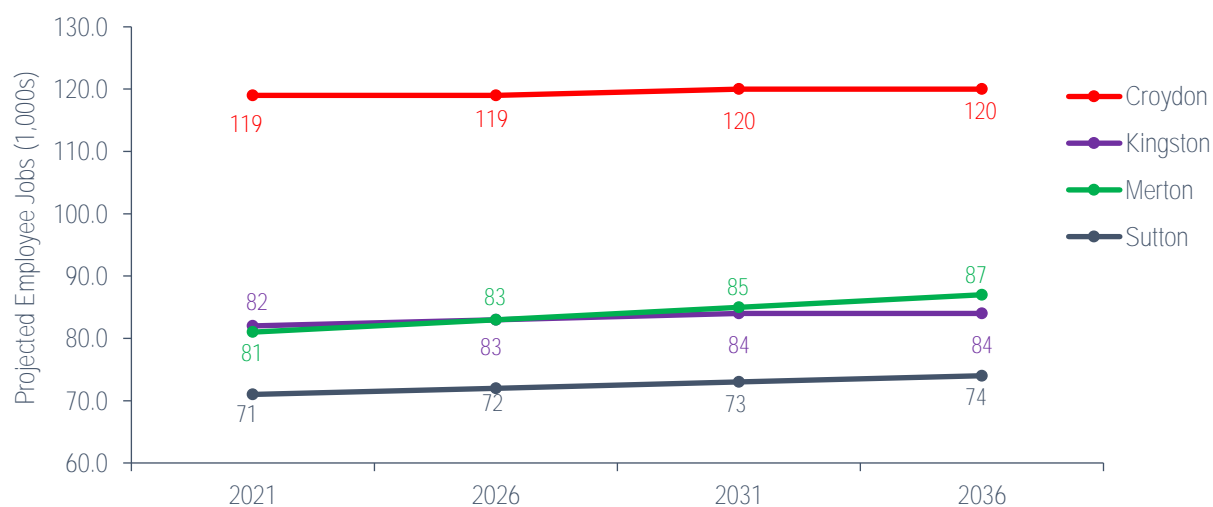
Source: NOMIS website on behalf of ONS September 2019

Figure 6.10: Job Density in LB Sutton and other South London Boroughs 2018



## Employment projections

Figure 6.11: Projected growth in employee jobs for SLWP boroughs 2021 to 2036



Source: GLA Employment Projections July 2017<sup>40</sup>

<sup>40</sup> Long term labour market projections are available on the GLA Datastore at <https://data.london.gov.uk/dataset/long-term-labour-market-projections/resource/28282ee1-5555-4524-ab43-a5df725cac43>

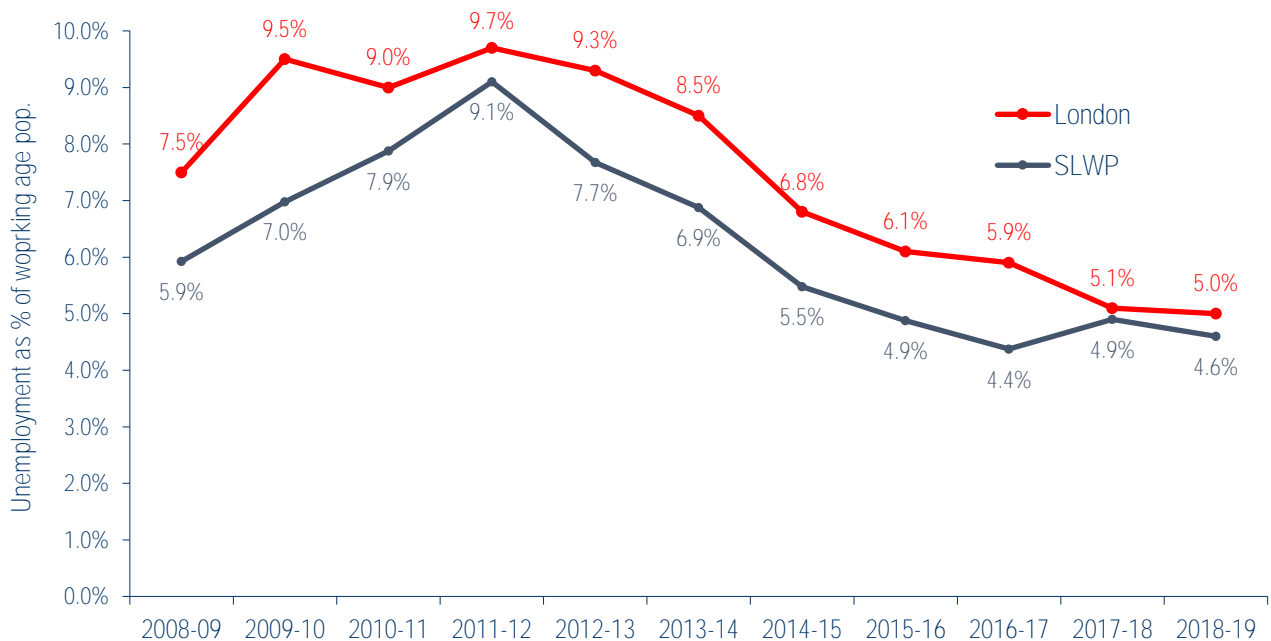
## Unemployment

Table 6.19: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs, plan area and London 2018-19

	Unemployed	Residents of working age (Aged 16-64)	Unemployment rate (%)
Croydon	11,100	247,800	5.3%
Kingston	3,200	115,800	3.2%
Merton	5,100	137,000	4.3%
Sutton	4,700	130,000	4.2%
<b>SLWP</b>	<b>22,900</b>	<b>630,600</b>	<b>4.6%</b>
LONDON	224,300	4,893,600	5%

Source: NOMIS website on behalf of ONS, April 2020

Figure 6.12: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs 2008-09 to 2018-19



Source: ONS annual population survey/ NOMIS website September 2019

## Employment sites

Table 6.20: Strategic Industrial Locations (SILs) within the SLWP boroughs

	Strategic Industrial Location (SIL)	Area (ha)
Croydon	Marlpit Lane	
	Imperial Way/Purley Way	24.69 ha
Kingston	Barwell Business Park (IBP)	
	Chessington Industrial Estate	34.9 ha
Merton	Beverley Way Industrial Area	
	Morden Road Factory Estate and Prince George's Road	
	North Wimbledon (part)	
	Willow Lane, Beddington & Hallowfield Way	41.45 ha
Sutton	Kimpton Industrial Area	18.8 ha
	Beddington Lane	105.8 ha
	Imperial Way	5.9 ha

Source: Local Plans



## Occupancy of industrial land

Table 6.21: Industrial land in SLWP boroughs and in the plan area: by categorisation (ha)

	Croydon	Kingston	Merton	Sutton	SLWP
<b>Total core &amp; wider uses (ha)</b>	<b>153.4</b>	<b>115.3</b>	<b>158.2</b>	<b>318.2</b>	<b>745.1</b>
Core industrial uses (ha) total	122.9	62.2	138.9	112.3	<b>436.3</b>
<i>Industry (general &amp; light industry)</i>	<i>50.0</i>	<i>27.8</i>	<i>56.5</i>	<i>32.0</i>	<b>166.3</b>
<i>Warehouses, self storage &amp; open storage</i>	<i>72.9</i>	<i>34.4</i>	<i>82.4</i>	<i>80.3</i>	<b>270</b>
Wider industrial uses (ha)	30.5	53.1	19.3	205.9	<b>308.8</b>
Vacant industrial land (ha)	<b>9.6</b>	<b>0.9</b>	<b>9.4</b>	<b>15.1</b>	<b>35.0</b>
<b>Total industrial land (ha)</b>	<b>163.0</b>	<b>116.2</b>	<b>167.5</b>	<b>333.3</b>	<b>780.0</b>
<b>Vacancy rate (overall)</b>	<b>5.9%</b>	<b>0.8%</b>	<b>5.6%</b>	<b>4.5%</b>	<b>4.5%</b>

London Industrial Land Demand Study (CAG Consultants, October 2017)

Table 6.22: Industrial land in SLWP boroughs and within the plan area: by designation (ha)

Designation	Use	Croydon	Kingston	Merton	Sutton	SLWP
<b>Strategic Industrial Locations (SIL)</b>	Industrial	82.2	38.7	105.9	120.6	347.4
	Vacant industrial land*	6.5	-	6.0	3.2	15.7
	Non-industrial	29.9	3.4	15.3	10.8	59.4
	<b>Sub-Total</b>	<b>118.6</b>	<b>42.1</b>	<b>127.2</b>	<b>134.7</b>	<b>422.6</b>
	Vacant Land % of SIL	5.2%	0.0%	4.5%	2.3%	3.7%
<b>Locally Significant Industrial Sites (LSIS)</b>	Industrial	20.3	16.1	27.6	4.2	68.2
	Vacant industrial land*	1.9	0.9	2.5	0.6	5.9
	Non-industrial	5.4	8.0	1.7	0.6	15.7
	<b>Sub-Total</b>	<b>27.7</b>	<b>25.0</b>	<b>31.8</b>	<b>5.4</b>	<b>89.9</b>
	Vacant Land % of LSIS	6.5%	3.4%	7.2%	10.4%	6.6%
<b>SIL+LSIS</b>	Industrial	102.5	54.7	133.5	124.9	415.6
	Vacant industrial land*	8.5	0.9	8.4	3.9	21.7
	Non-industrial	35.3	11.4	17.1	11.4	75.2
	<b>Sub-Total</b>	<b>146.3</b>	<b>67.0</b>	<b>159.0</b>	<b>140.2</b>	<b>512.5</b>
	<b>Non-designated Industrial land</b>	Industrial	<b>75.2</b>	60.6	24.6	193.3
	Vacant industrial land*	1.1	-	0.9	11.2	13.2
<b>Total Designated + Non-Designated (ha)</b>	Industrial	153.4	115.3	158.2	318.2	745.1
	Vacant industrial land*	9.6	0.9	9.4	15.1	35.0
	Non-industrial	35.3	11.4	17.1	11.4	75.2
<b>GRAND TOTAL</b>		<b>198.3</b>	<b>127.6</b>	<b>184.6</b>	<b>344.7</b>	<b>855.2</b>
<b>Vacant Land (%)</b>		<b>4.8%</b>	<b>0.7%</b>	<b>5.1%</b>	<b>4.4%</b>	<b>4.1%</b>

London Industrial Land Demand Study (CAG Consultants, October 2017)

**Table 6.23: Industrial land in SLWP area: core, wider and non-industrial activities for SLWP boroughs and within the plan area 2016-41**

	Use	Croydon	Kingston	Merton	Sutton	SLWP
Core industrial uses (ha)	Light industry	-	15.9	7.4	7.8	<b>38.9</b>
	General industry	42.2	11.9	49.1	24.1	<b>127.3</b>
	Warehouses	63.9	33.6	72.2	76	<b>245.7</b>
	Self storage	4.4	0.8	3.5	4.3	<b>13</b>
	Open storage	4.6	0	6.7	0	<b>11.3</b>
	<b>Core Sub-Total</b>	<b>122.9</b>	<b>62.2</b>	<b>138.9</b>	<b>112.3</b>	<b>436.3</b>
Wider industrial uses (ha)	Whole-sale markets	1.2	0.5	0	0	<b>1.7</b>
	Waste management	5	34.2	9.4	6.6	<b>55.2</b>
	Utilities	18.6	16.4	7.5	193.9	<b>236.4</b>
	Land for rail	5.6	1.8	0	4	<b>11.4</b>
	Land for buses	0.1	0	2.4	1.3	<b>3.8</b>
	Docks	0	0.1	0	0	<b>0.1</b>
	Other industrial	0	0	0	0	<b>0</b>
	<b>Wider Sub-Total</b>	<b>30.5</b>	<b>53.1</b>	<b>19.3</b>	<b>205.9</b>	<b>308.8</b>
Vacant land	Vacant industrial land*	7.4	0.2	4.2	12.6	<b>24.4</b>
	Land with vacant buildings	2.2	0.7	5.2	2.5	<b>10.6</b>
Non-industrial uses	Office	7.4	6.5	2.8	1.3	<b>18</b>
	Retail	15.2	2.7	12	7.1	<b>37</b>
	Residential	8.1	0.6	0.6	0.4	<b>9.7</b>
	Recreation & leisure	0	0.3	0.5	0.6	<b>1.4</b>
	Community services	0.8	0.5	1.3	0	<b>2.6</b>
	Mixed-use	1.4	0	0	0	<b>1.4</b>
	Other non-industrial	2.4	0.7	0	2	<b>5.1</b>
	<b>Non-industrial Sub-Total</b>	<b>35.3</b>	<b>11.4</b>	<b>17.1</b>	<b>11.4</b>	<b>75.2</b>
Total: Core + Wider (ha)		153.4	115.3	158.2	318.2	<b>745.1</b>
Total: Core + Wider (ha) + Vacant		163	116.2	167.5	333.3	<b>780</b>
<b>GRAND TOTAL</b>		<b>198.3</b>	<b>127.6</b>	<b>184.6</b>	<b>344.7</b>	<b>855.2</b>

London Industrial Land Demand Study (CAG Consultants, October 2017)

## Projected change in industrial floorspace

**Table 6.24 Projected change in industrial floorspace for SLWP boroughs 2016-41**

	Employment Projection Method	Trend Based
Croydon	-61,700	-123,600
Kingston	-41,300	27,200
Merton	-21,700	-116,300
Sutton	-31,100	98,700
<b>SLWP</b>	<b>-155,800</b>	<b>-114,000</b>
<b>LONDON</b>	<b>-1,151,400</b>	<b>-1,048,100</b>

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

## Projected land demand for industrial and warehousing uses

**Table 6.25: Forecast land demand for General & Light Industry for SLWP boroughs 2016-41 (ha)**

	Employment-Based	Trend-Based	Average
Croydon	-9.5	-19.0	-14.3
Kingston	-6.4	4.2	-1.1
Merton	-3.3	-17.9	-10.6
Sutton	-4.8	15.2	5.2
<b>SLWP</b>	<b>-24</b>	<b>-17.5</b>	<b>-20.8</b>
LONDON	-173.3	-159.7	-166.5

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

**Table 6.26: Projected change in demand for warehouse floorspace and land for SLWP boroughs 2016-41**

	Floorspace	Land (ha)
Croydon	-27,300	-4.2
Kingston	-56,200	-8.6
Merton	41,000	6.3
Sutton	110,800	17.0
<b>SLWP</b>	<b>68,300</b>	<b>11.0</b>
LONDON	1,608,400	279.6

Source: Employment Projection Method Trend-Based (CAG Consultants 2017)

## Projected land demand for apportioned waste as of 2016 (based upon the previous London Plan)<sup>41</sup>

**Table 6.27: Indicative net land requirement for apportioned waste for SLWP boroughs to 2036**

	Previous London Plan 2016 apportionment of HH and C&I waste to 2036 (tpa)	Land requirement (ha)	Indicative land take of planned capacity (ha)	Net Indicative Land Requirement (ha)
Croydon	247,000	4.2	0.2	4.0
Kingston	148,000	2.5	0.0	2.5
Merton	239,000	4.1	2.5	1.5
Sutton	198,000	3.4	4.8	-1.4
<b>SLWP</b>	<b>832,000</b>	<b>14.2</b>	<b>7.5</b>	<b>6.6</b>
LONDON	8,325,000	137.9	171.8	-33.9

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

## Release of industrial land to other uses

**Table 6.28: Industrial pipeline planned release to other uses for SLWP boroughs as of 2016 (ha)**

	Development pipeline (LDD)	Local Plan/ Opportunity Areas/ Site Allocations	Total
Croydon	1.3	0	1.3
Kingston	0.6	0	0.6
Merton	0.7	0.1	0.8
Sutton	10.2	7.5 <sup>42</sup>	17.7
<b>SLWP</b>	<b>12.8</b>	<b>7.6</b>	<b>20.4</b>

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

<sup>41</sup> as discussed in Section 3 of this report, the new London Plan 2019-41 has introduced revised borough apportionment targets for household and C&I waste streams, so the data in this table will be superseded

<sup>42</sup> as of September 2019, this land (at the former Felnex industrial estate and the former Wandle Valley Trading Estate in Hackbridge) is now under construction for residential uses

**Table 6.29: Projected industrial land release by borough 2016-41**

	Industrial	Warehousing	Waste	Other	Demand	Surplus from excess vacant land	Net release
Croydon	-14.3	-4.2	4.0	8.0	-6.5	-3.5	-9.9
Kingston	-1.1	-8.6	2.5	-	-7.2	0.0	-7.2
Merton	-10.6	6.3	1.5	-	-2.8	-2.2	-5.0
Sutton	5.2	17.0	-1.4	1.7	22.5	-8.0 <sup>43</sup>	14.5
<b>SLWP</b>	<b>-20.8</b>	<b>10.5</b>	<b>6.6</b>	<b>9.7</b>	<b>6</b>	<b>-13.7</b>	<b>-7.6</b>

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

**Table 6.30: Comparison of London Plan 2016 Benchmark Demand and Pipeline Release of industrial land to other uses**

	Benchmark release (London Plan 2016)	Planned release	Planned – benchmark comparison
Croydon	-9.9	-1.3	8.6
Kingston	-7.2	-0.6	6.7
Merton	-5.0	-0.8	4.2
Sutton	14.5	-17.7	-32.2
<b>SLWP</b>	<b>-7.6</b>	<b>-20.4</b>	<b>-12.7</b>

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

## Borough classifications for the management of industrial floorspace capacity

**Table 6.31: Management of industrial floorspace capacity – borough classifications (see also Table 6.2 of new London Plan) 2016-41<sup>44</sup>**

	Vacancy Rate (%)	Rents	Baseline net release (ha)	Categorisation in new London Plan	Notes
Croydon	5.9%	£10.25	-9.9	<b>Retain</b>	These boroughs should seek to intensify industrial floorspace capacity following the principle of no net loss across SILs and locally significant industrial areas
Kingston	0.8%	£12.00	-7.2	<b>Retain</b>	
Merton	5.6%	£10.50	-5.0	<b>Retain</b>	
Sutton	4.5%	£11.75	14.5	<b>Provide Capacity</b> (i.e. demand for industrial, logistics and related uses is anticipated to be the strongest)	LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations accessible to strategic road networks and in other sustainable locations. Sutton's new Local Plan (February 2018) has identified 10 additional hectares of land for industrial uses to 2031.

Source: Draft new London Plan 2017 and London Industrial Land Supply and Economy Study (CAG Consultants ,2016)

<sup>43</sup> Sutton's surplus excess vacant land is thought to be accounted for by the former Felnex industrial estate and the Wandle Valley Trading Estate, so there may be an element of double-counting between Tables 6.28 and 6.29

<sup>44</sup> in the Wandle Valley property market area there is an overall positive net demand, and this is strongest in Sutton and Wandsworth

## Town Centre Network

Table 6.32: Town centre network in SLWP area: retail floorspace and outlets

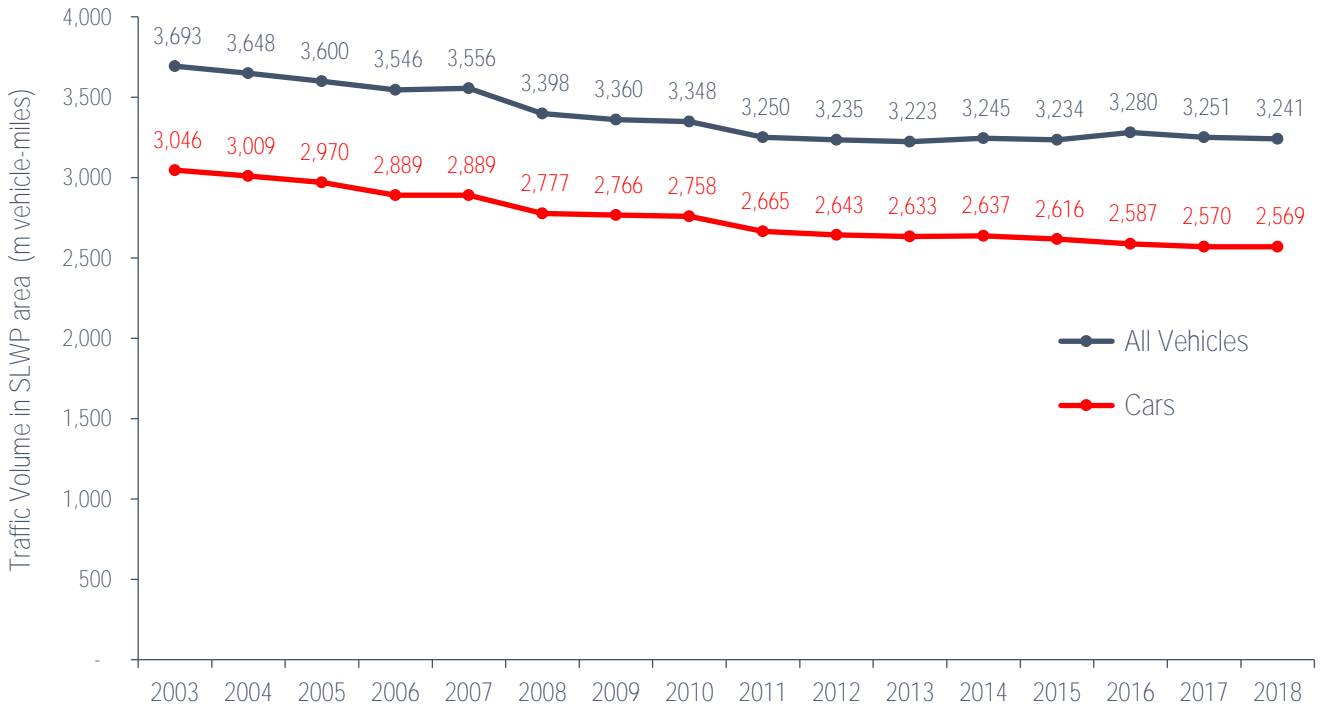
Borough	Centre	Classification (LP2016)	Retail Floorspace			Retail Outlets		
			Comparison (sq.m)	Convenience (sq.m)	Service (sq.m)	Comparison	Convenience	Service
Croydon	Croydon	Metropolitan	157,155	13,850	9,800	239	59	87
	Addiscombe	District	3,200	2,660	2,080	25	13	23
	Coulsdon	District	4,030	1,790	3,130	32	10	28
	New Addington	District	2,350	2,500	930	11	10	9
	Norbury	District	3,080	4,870	3,440	24	25	32
	Purley	District	4,150	8,680	4,500	25	7	39
	Selsdon	District	1,400	6,240	1,120	13	6	16
	South Norwood	District	2,620	3,230	3,150	21	21	35
	Thornton Heath	District	5,030	11,170	2,790	31	28	37
	Upper Norwood/ Crystal Palace	District	6,650	5,330	2,400	49	17	24
Kingston	Kingston	Metropolitan	134,080	9,890	5,180	244	32	52
	New Malden	District	9,851	6,230	3,270	36	17	29
	Surbiton	District	8,256	7,320	4,330	45	14	36
	Tolworth	District	4,170	4,180	1,980	33	13	22
Merton	Wimbledon	Major	37,508	11,380	4,370	101	25	35
	Mitcham	District	4,967	7,940	2,440	28	23	26
	Morden	District	3,340	7,520	2,660	23	26	24
	Colliers Wood	PotentialDistrict	22,900	10,710	540	17	1	2
Sutton	Sutton	Metropolitan	70,593	20,140	5,490	121	24	50
	Carshalton Village	District	2,720	1,560	1,410	15	6	13
	Cheam Village	District	4,410	1,530	2,510	34	7	21
	North Cheam	District	3,150	9,980	1,330	24	7	18
	Rosehill	District	<b>2,764</b>	<b>3,264</b>	<b>1,701</b>	<b>15</b>	<b>15</b>	<b>19</b>
	Wallington	District	6,000	7,060	2,290	38	12	25
	Worcester Park	District	6,800	4,690	4,260	39	11	31
	Hackbridge	PotentialDistrict	547	1,223	477	1	1	1



# ENVIRONMENT

## Traffic growth and congestion

Figure 6.13: Traffic Volumes (million vehicle-km) in SLWP area 2003 to 2018



Source: Department for Transport (DfT) 2019

Table 6.33: Overall volume of vehicular traffic for SLWP boroughs and plan area 2008-2018

	Volume of vehicular traffic (million vehicle-km)		Change in volume of vehicular traffic from 2008 to 2018	
	2008	2018	million vehicle-km	% change
Croydon	1,212	1,156	-56	-4.6%
Kingston	925	887	-38	-4.1%
Merton	621	585	-36	-5.8%
Sutton	640	613	-27	-4.2%
<b>SLWP</b>	<b>3,398</b>	<b>3,241</b>	<b>-157</b>	<b>-4.6%</b>
London	30,273	29,539	-734	-2.4%

Table 6.34: Overall volume of car traffic for SLWP boroughs and plan area 2008-2018

	Volume of car traffic (million vehicle-km)		Change in volume of car traffic 2008-18	
	2008	2018	million vehicle-km	% change
Croydon	989	917	-72	-7.3%
Kingston	766	713	-53	-6.9%
Merton	497	452	-45	-9.1%
Sutton	525	487	-38	-7.2%
<b>SLWP</b>	<b>2,777</b>	<b>2,569</b>	<b>-208</b>	<b>-7.5%</b>
London	23,878	22,573	-1305	-5.5%

Source: Department for Transport (DfT) 2019

## Modal share

Table 6.35: Trips per day by borough of origin, and modal shares (average day) 2016/17 to 2018/19 for SLWP boroughs and plan area

	Croydon	Kingston	Merton	Sutton	SLWP	London
Total trips per day (000s)	832	387	435	452	<b>2,096</b>	18,047
Rail	10%	10%	9%	8%	<b>9%</b>	6%
Underground	1%	1%	8%	3%	<b>3.2%</b>	10%
Bus/tram	16%	12%	12%	10%	<b>12.4%</b>	14%
Taxi/other	1%	1%	1%	1%	<b>0.9%</b>	2%
Car/MC	48%	42%	42%	51%	<b>45.8%</b>	35%
Cycle	1%	3%	1%	1%	<b>1.4%</b>	3%
Walk	24%	32%	28%	26%	<b>27.3%</b>	32%

Source: Borough Local Implementation Plan (LIP) performance indicators, TfL

## Road casualties

Table 6.36: Road casualties, people killed or seriously injured in road traffic collisions 2014-18\*

	Croydon	Kingston	Merton	Sutton	SLWP	London
2005-09 average	252	103	117	124	596	6,402
2014	135	67	83	51	336	3,969
2015	121	49	68	40	278	3,775
2016	122	52	69	45	288	3,759
2017	126	50	60	61	297	3,883
2018	112	55	78	70	315	4,079
2017 to 2018	-13%	+10%	+30%	+15%	+6%	+5%
2018 compared to 2005-09 baseline	-56%	-47%	-33%	-44%	-47%	-36%

Source: DfT Reported KSI (adjusted) Road Casualties GB Annual Report 2018

\*Note on changes to the reporting of road traffic casualties:

The Metropolitan Police introduced a new collision reporting system in November 2016 which uses an 'injury-based assessment' in line with DfT guidance together with online self-reporting. While both of these changes are expected to provide a better assessment of injury occurrence and severity, this has made data collected from November 2016 onwards difficult to compare with earlier data.

TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017, and are used in this table

## Road Network

Table 6.37: Road classifications in SLWP area

	'A' Roads including Strategic Red Routes (TfL road network) (km)	Minor Roads including other 'A' Roads, 'B' Roads, 'C' Roads and unclassified local access roads (km)	Total Road Length (km)
Croydon	78.1 km	698.3 km	776.4 km
Kingston	44.7 km	299.4 km	344.1 km
Merton	42.4 km	336.9 km	379.3 km
Sutton	29.6 km	402.3 km	431.9 km
<b>SLWP</b>	194.8 km	1736.9 km	1931.7 km

## Highway asset condition

Table 6.38: Highway asset condition – percentage of the principal road network length in poor condition and requires requires maintenance<sup>35</sup> for SLWP boroughs and plan area 2012-16

	2014-15	2015-16	2016-17
Croydon	33.4%	36.3%	13.2%
Kingston	19.0%	17.8%	18.2%
Merton	15.4%	15.9%	8.8%
Sutton	14.7%	16.2%	11.9%
<b>SLWP</b>	20.6%	21.6%	13.0%
London	16.0%	15.3%	12.6%

Source: Borough Local Implementation Plan (LIP) performance indicators (TfL, Report 10)

## Air Quality<sup>36</sup>

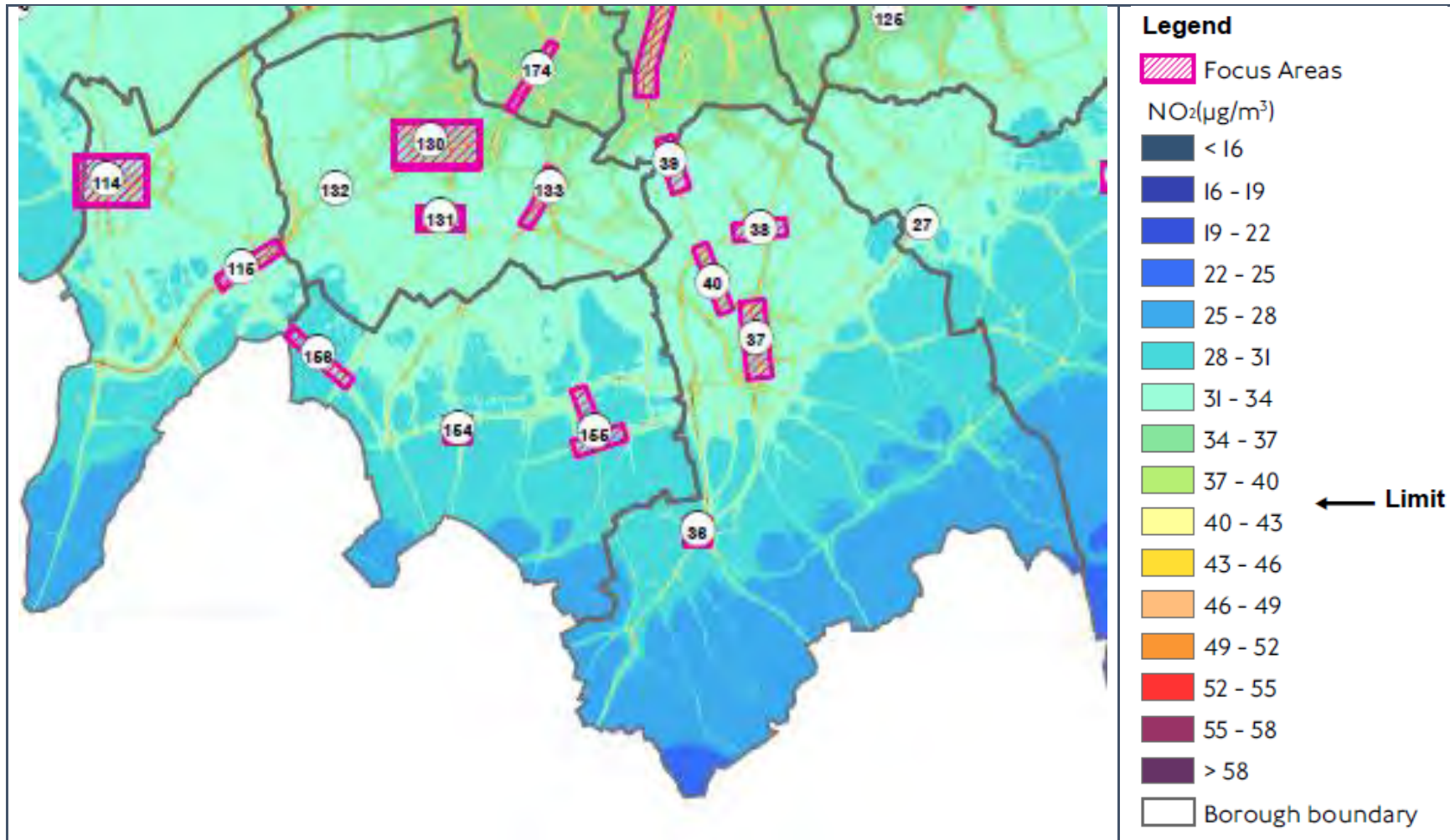
Table 6.39: Air Quality Focus Areas within the SLWP area

	Air Quality Focus Area
Croydon	Purley Cross and Russell Hill
	Wellesley Road
	Thornton Heath Brigstock Rd/High St/Whitehorse Lane
	Norbury London Road
	London Road between Thornton Heath Pond and St James Road
Kingston	Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road
	A3 Kingston Bypass at Malden Junction
Merton	Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road
	Morden Road/London Road/Morden Hall Road/Martin Way
	Raynes Park junctions Kingston Road/Bushey Road
	Mitcham London Road A216 from Cricket Green to Streatham Road Junction
Sutton	Sutton A232 Cheam/Carshalton Rd/High St/Brighton Rd
	Wallington Manor Rd/Stanley Park Rd/Stafford Rd
	Central Road/ Cheam Common Road

<sup>35</sup> based on Detailed Visual Inspection survey data

<sup>36</sup> Air Quality Focus Areas are locations that not only exceed the EU annual mean limit value for NO2 but are also locations with high human exposure. They were defined to address concerns raised by boroughs within the LAQM review process and forecasted air pollution trends

Figure: 6.14: Air Quality Focus Areas within the SLWP area



Source: London Atmospheric Emissions Inventory 2016

Table 6.40: Air quality monitoring results for Croydon in 2018<sup>37</sup>

National air quality objective	Norbury		Norbury Manor		Park Lane		Purley Way (A23)	
	2018	Met?	2018	Met?	2018	Met?	2018	Met?
<b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>								
200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year	0	YES	-	-	0	YES	0	YES
40 ug/m <sup>3</sup> as an annual mean	49	NO	-	-	41	NO	31	YES
<b>PARTICULATE (PM10)</b>								
40 ug/m <sup>3</sup> as an annual mean	-	-	-	-	21	YES	-	-
50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year	-	-	-	-	1	YES	-	-
<b>PARTICULATE (PM2.5)</b>								
25 ug/m <sup>3</sup> as an annual mean	-	-	12	YES	-	-	-	-

Source: London Air Quality Network (September 2019)

Table 6.41: Air quality monitoring results for Kingston in 2018

National air quality objective	Cromwell Road		Kingston Vale		Tolworth Broadway	
	2018	Met?	2018	Met?	2018	Met?
<b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>						
200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year	1	YES	0	YES	0	YES
40 ug/m <sup>3</sup> as an annual mean	55	NO	36	YES	44	NO
<b>PARTICULATE (PM10)</b>						
40 ug/m <sup>3</sup> as an annual mean	30	YES	22	YES	23	YES
50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year	15	YES	2	YES	2	YES
<b>PARTICULATE (PM2.5)</b>						
25 ug/m <sup>3</sup> as an annual mean	-	-	-	-	-	-

Source: London Air Quality Network (September 2019)

<sup>37</sup> calendar year from 1 January 2018 to 31 December 2018



Table 6.42: Air quality monitoring results for Merton in 2018

National air quality objective	Merton Road		Morden Civic Centre (2)	
	2018	Met?	2018	Met?
<b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>				
200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year	-	-	0	YES
40 ug/m <sup>3</sup> as an annual mean	-	-	48	NO
<b>PARTICULATE (PM<sub>10</sub>)</b>				
40 ug/m <sup>3</sup> as an annual mean	32	YES	-	-
50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year	13	YES	-	-
<b>PARTICULATE (PM<sub>2.5</sub>)</b>				
25 ug/m <sup>3</sup> as an annual mean				

Source: London Air Quality Network (September 2019)

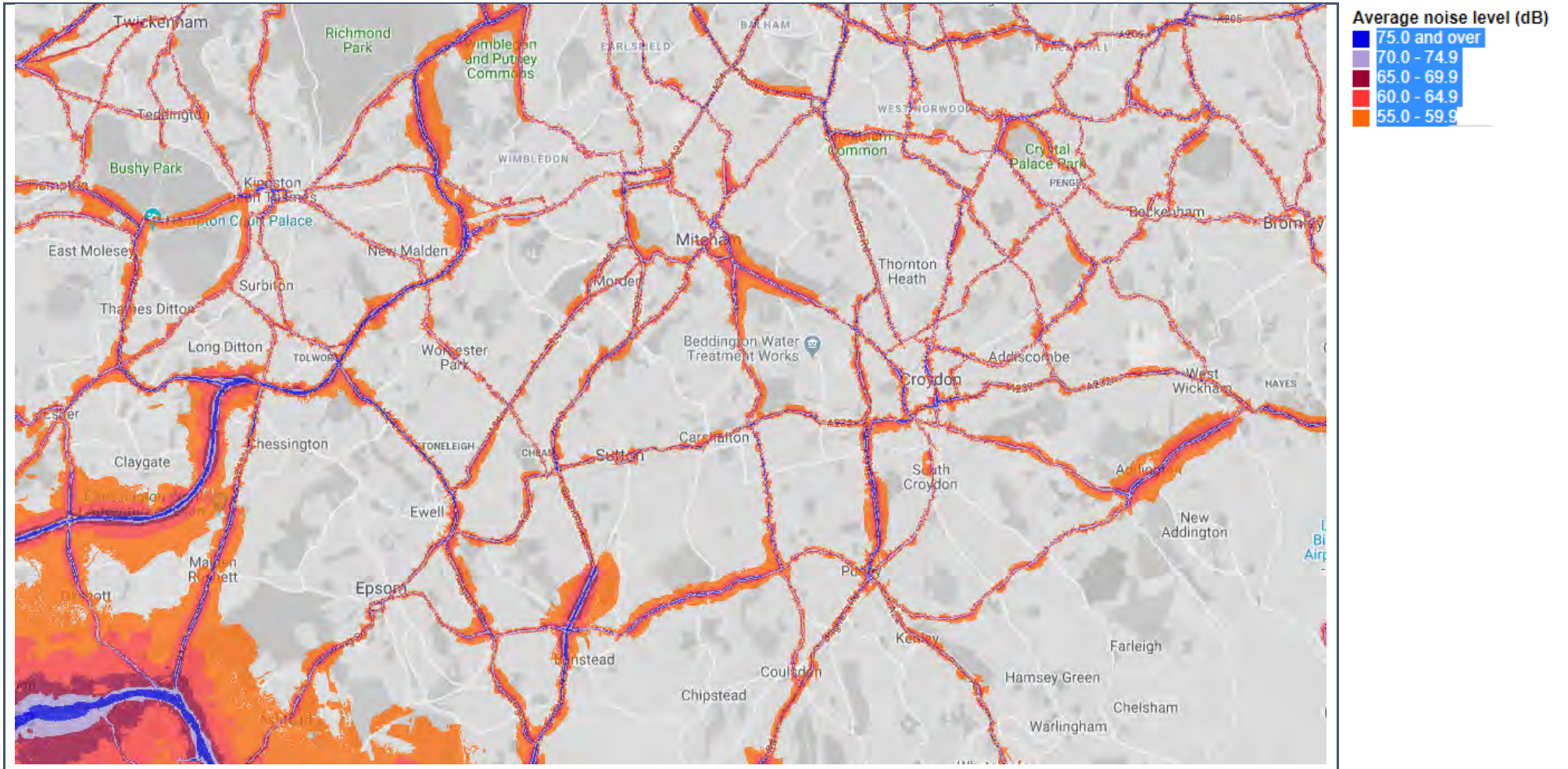
Table 6.43: Air quality monitoring results for Sutton in 2018

National air quality objective	Beddington Lane		Beddington Lane North		Wallington		Worcester Park	
	2018	Met?	2018	Met?	2018	Met?	2018	Met?
<b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>								
200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year	0	YES	0	YES	0	YES	7	YES
40 ug/m <sup>3</sup> as an annual mean	25	YES	29	YES	47	NO	52	NO
<b>PARTICULATE (PM<sub>10</sub>)</b>								
40 ug/m <sup>3</sup> as an annual mean	22	YES	22	YES	23	YES	20	YES
50 ug/m <sup>3</sup> as a 24 hour mean, not to be exceeded more than 35 times a year	7	YES	2	YES	4	YES	2	YES
<b>PARTICULATE (PM<sub>2.5</sub>)</b>								
25 ug/m <sup>3</sup> as an annual mean	-	-	12	YES	-	-	-	-

Source: London Air Quality Network (September 2019)

## Noise exposure

Figure 6.15: Road traffic noise exposure in the SLWP area (Lden)<sup>38</sup>



Source: DEFRA Strategic Noise Mapping 2017

<sup>38</sup> Lden (day-evening-night) = a 24 hour annual average noise level in decibels with weightings applied for evening and night periods

## Carbon Dioxide (CO<sub>2</sub>) Emissions

Figure 6.16: CO<sub>2</sub> emissions within the SLWP area - TOTAL

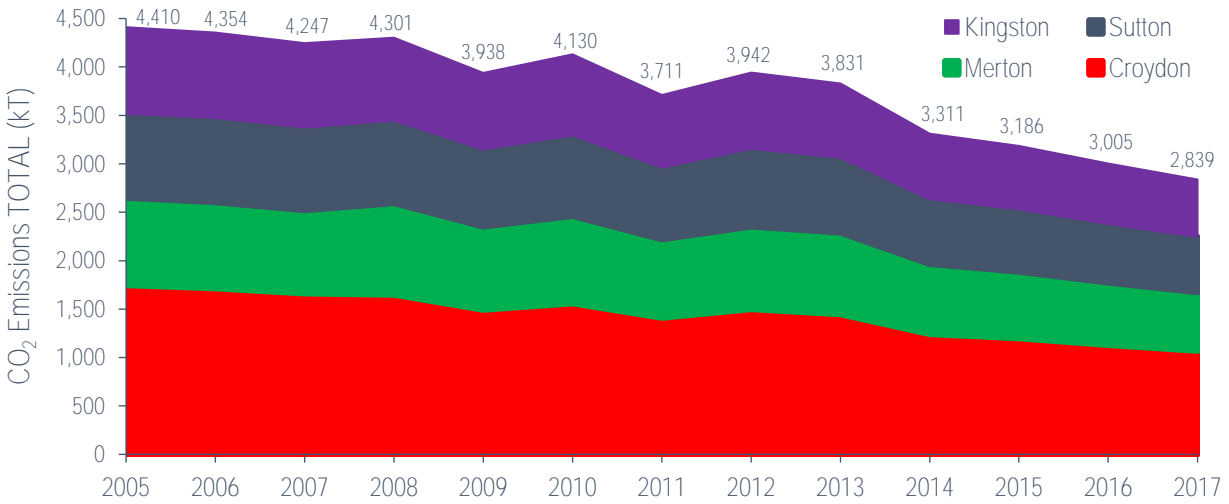


Figure 6.17: CO<sub>2</sub> emissions within the SLWP area - TRANSPORT

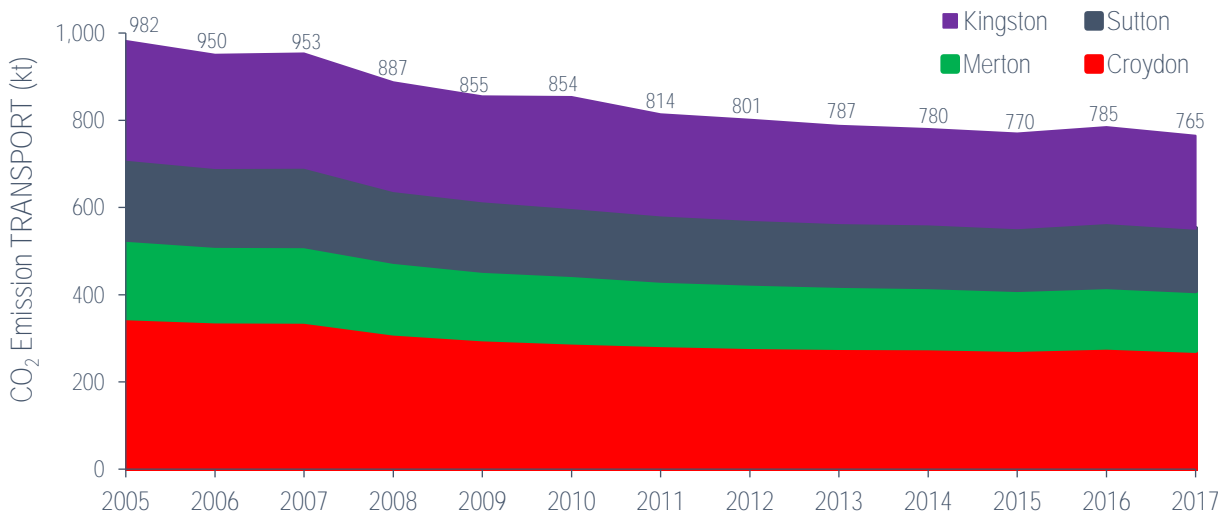
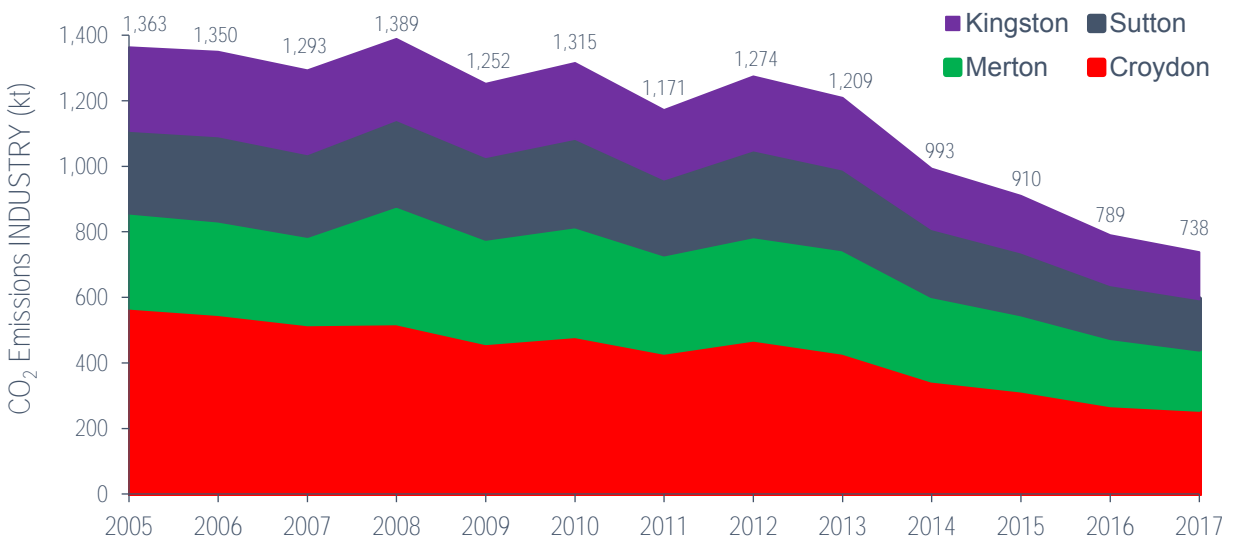
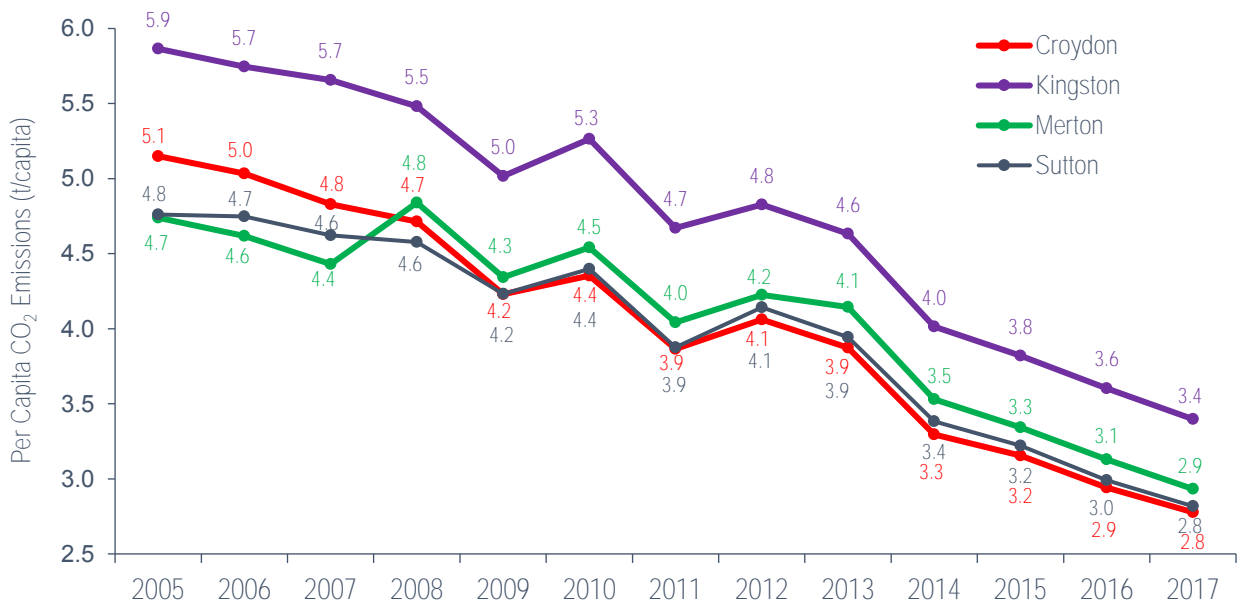


Figure 6.18: CO<sub>2</sub> emissions within the SLWP area - INDUSTRY AND COMMERCE



Source: UK local authority carbon dioxide emissions national statistics for 2005-16 (BEIS, June 2019)

Figure 6.19: Per capita CO<sub>2</sub> emissions within for SLWP boroughs 2005-2017 - total



## Climate Change

Table 6.44: UK climate trends

4th Annual State of the UK Climate Report (July 2018) <sup>39</sup>	
<ul style="list-style-type: none"> <li>2017 was the 5th warmest year in records dating back to 1910.</li> <li>Average UK temperatures over the last decade (2008-2017) were 0.8°C warmer than the 1961-1990 average.</li> <li>In contrast to summer 2018, UK summers have been notably wetter over the last decade (2008-2017), with a 20% increase in rainfall compared to 1961-1990.</li> <li>Nine of the ten warmest years in the UK have occurred since 2002, and all of the top ten since 1990.</li> <li>The Central England Temperature series, which extends back to 1659, shows that the 21<sup>st</sup> century has so far been warmer than the previous three centuries.;</li> <li>Although 2017 was not perceived to be a particularly warm year, it was still more than 1°C warmer than the 1961-1990 baseline and ranks fifth warmest year overall for the UK.</li> <li>Mean sea level around the UK has risen at a rate of approximately 1.4 mm per year since the start of the 20<sup>th</sup> Century. equivalent to a rise of about 16 cm.</li> </ul>	

Source: 4th Annual State of the UK Climate Report (Met Office, July 2018)

Table 6.45: Future Climate Projections

Change in Climate	UKCP09 Emissions <sup>40</sup> Scenarios in the 2050s		
	Low Emissions	Medium	High Emissions
<b>TEMPERATURE</b>			
Increase in <b>winter mean temperature</b>	+2°C	+2.2°C	+2.5°C
Increase in <b>summer mean temperature</b>	+2.5°C	+2.7°C	+3.1°C
Increase in <b>summer mean daily maximum temp.</b>	+3.5°C	+3.7°C	+4.3°C
Increase in <b>summer mean daily min temp.</b>	+2.7°C	2.9°C	+3.3°C
<b>RAINFALL</b>			
Change in <b>annual mean precipitation</b>	0%	0%	0%
Change in <b>winter mean precipitation</b>	+12%	+14%	+16%
Change in <b>summer mean precipitation</b>	- 14%	- 19%	-19%

Source: UK Climate Impacts Programme Projections (UKCP09)

<sup>39</sup> the Met Office's Annual State of the UK Climate Report provides an up-to-date assessment of UK climate trends, variations and extremes based on the latest available climate quality observational datasets – see <https://www.metoffice.gov.uk/research/climate/maps-and-data/about/state-of-climate>

<sup>40</sup> the relevant UKCP18 projections are not yet available at the local level so the corresponding UKCP09 projections are quoted here



**UK Climate Projections 2018 (UKCP18)**

According to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC, 2014), atmospheric carbon dioxide (CO<sub>2</sub>) levels in 2011 reached their highest point for almost 1 million years, rising to a new level of over 391 parts per million (ppm) compared to around 280 ppm prior to the industrial revolution. In the northern hemisphere, 1983 -2012 was the warmest 30-year period of the last 1400 years and 13 of the 15 hottest years on record globally have all occurred since 2000.

By April 2018 average CO<sub>2</sub> levels had risen to a new high of 410 ppm. According to a Special Report<sup>41</sup> produced by the IPCC in November 2018, this has contributed to around a 1.0°C increase in average global temperatures since pre-industrial times. The IPCC Special Report concluded that international efforts should be stepped up to limit warming to 1.5°C rather than the aspirational 2 °C target set by the Paris Agreement in order to avoid catastrophic impacts on human health, ecosystems, critical infrastructure, water supply and economic growth. However, this can only be achieved if global CO<sub>2</sub> emissions start to fall well before 2030 through rapid and far-reaching transitions in energy supply, land-use, industry and transport.

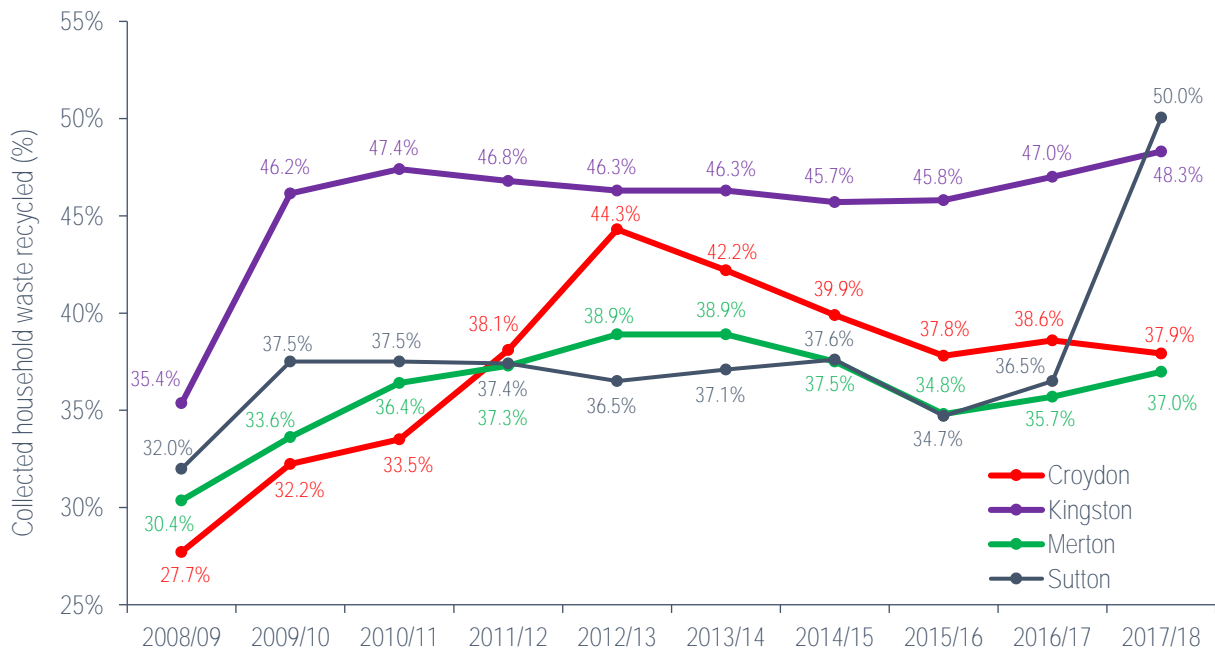
The latest UK Climate Projections 2018 (UKCP18)<sup>42</sup>, published by the Met Office in November 2018, show that:

- by 2070, in the high emission scenario<sup>43</sup>, average warming across the UK is projected to range from 0.9 °C to 5.4 °C in summer, and from 0.7 °C to 4.2 °C in winter.
- hot summers are expected to become more common. In the recent past (1981-2000) the chance of seeing a summer as hot as 2018 was low (<10%). The chance has already increased due to climate change and is now between 10-20%. With future warming, hot summers by mid-century will be even more common (~50%).
- human-induced climate change has made the 2018 record-breaking UK summer temperatures about 30 times more likely than it would be naturally.
- by 2070, in the high emission scenario, average changes in rainfall patterns across the UK are projected to range from -47% to +2% in summer, and between -1% to +35% in winter.
- by the end of the century, sea levels are projected to rise between 0.53m & 1.15m (high emission scenario).

UK Climate Projections 2018 (UKCP18)<sup>44</sup>, published by the Met Office in November 2018

## Household waste recycling rate

**Figure 6.20: Household waste recycling rate for SLWP boroughs 2008-09 to 2017-18**



<sup>41</sup> the IPCC Special Report is available at [https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15\\_SPM\\_High\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_High_Res.pdf)

<sup>42</sup> UKCP18 headline findings at <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

<sup>43</sup> UKCP18 projections provide local low, central and high changes across the UK, corresponding to 10%, 50% and 90% probability levels. Local values are averaged over the UK to give a range of average precipitation change between the 10%- 90% probability levels

<sup>44</sup> UKCP18 headline findings at <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>



# Flood Risk

## CROYDON

Figure 6.21: Fluvial flood risk in Croydon - Environment Agency Flood Zones

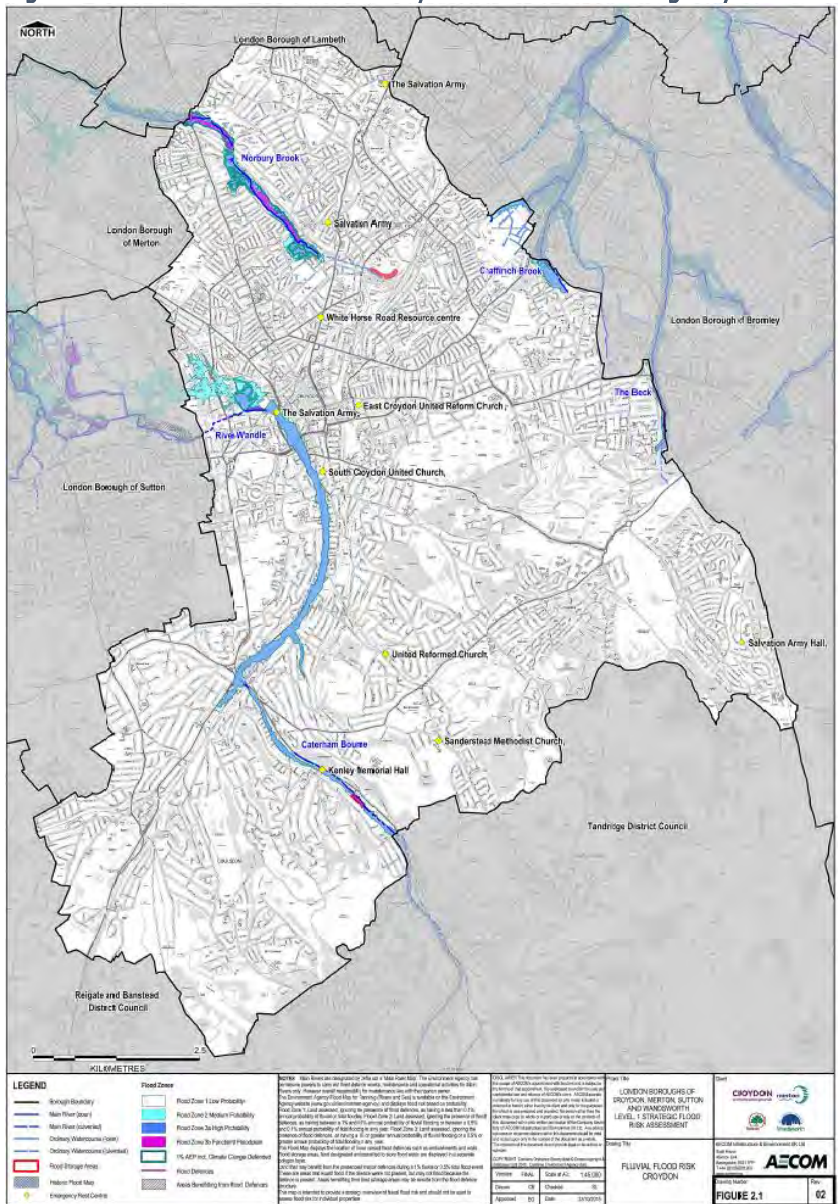
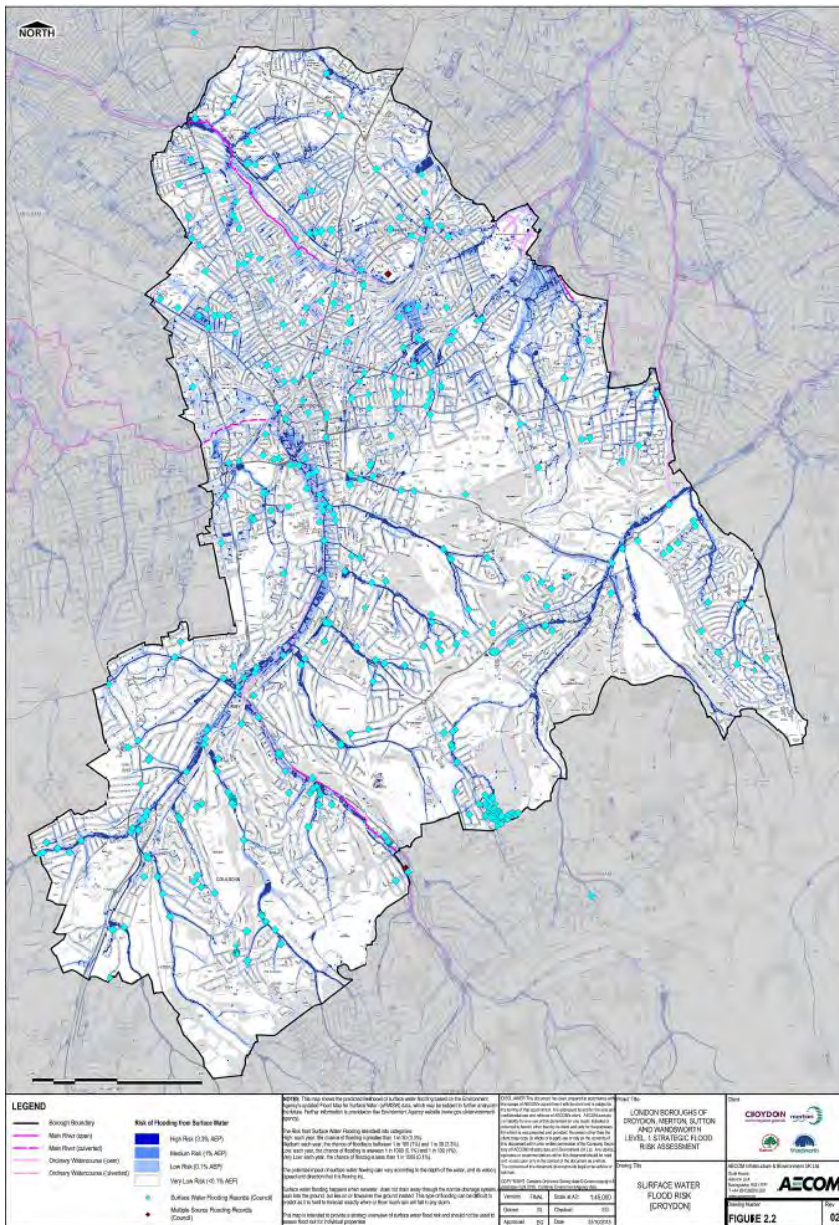


Table 6.46: Fluvial flood risk in Croydon – Properties located within EA Flood Zones

EA Flood Zone	Flood Risk	% of Borough	Dwellings	Non-Residential	Unclassified
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability (<0.1%)	97.8%	144,140	6,149	8,649
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%)	1.7%	1,030	113	107
Flood Zone 3a High Risk	More than 1 in a 100 annual probability (>1%)	<0.5%	3,913	380	326
Flood Zone 3b Functional Floodplain	More than 1 in 20 annual probability (>5% 'defended').	<0.5%	235	48	15

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.22: Surface water flood risk in Croydon based on the Government’s Risk of Flooding from Surface Water (RoFSW) map



Source: SFRA Level 1 Report (AECOM, December 2015)

Table 6.47 Surface Water Flooding in Croydon: Dwellings at Risk in the 1 in 100 year event

RoFSW <sup>45</sup> Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability (<1%)	32,090	1,434	1,722
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	10,094	871	638
High	More than 1 in a 30 annual probability (>3.3%)	5,856	737	513

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

<sup>45</sup> based on the Government’s Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMfSW))



**KINGSTON**

Figure 6.23: Fluvial flood risk in Kingston - Environment Agency Flood Zones

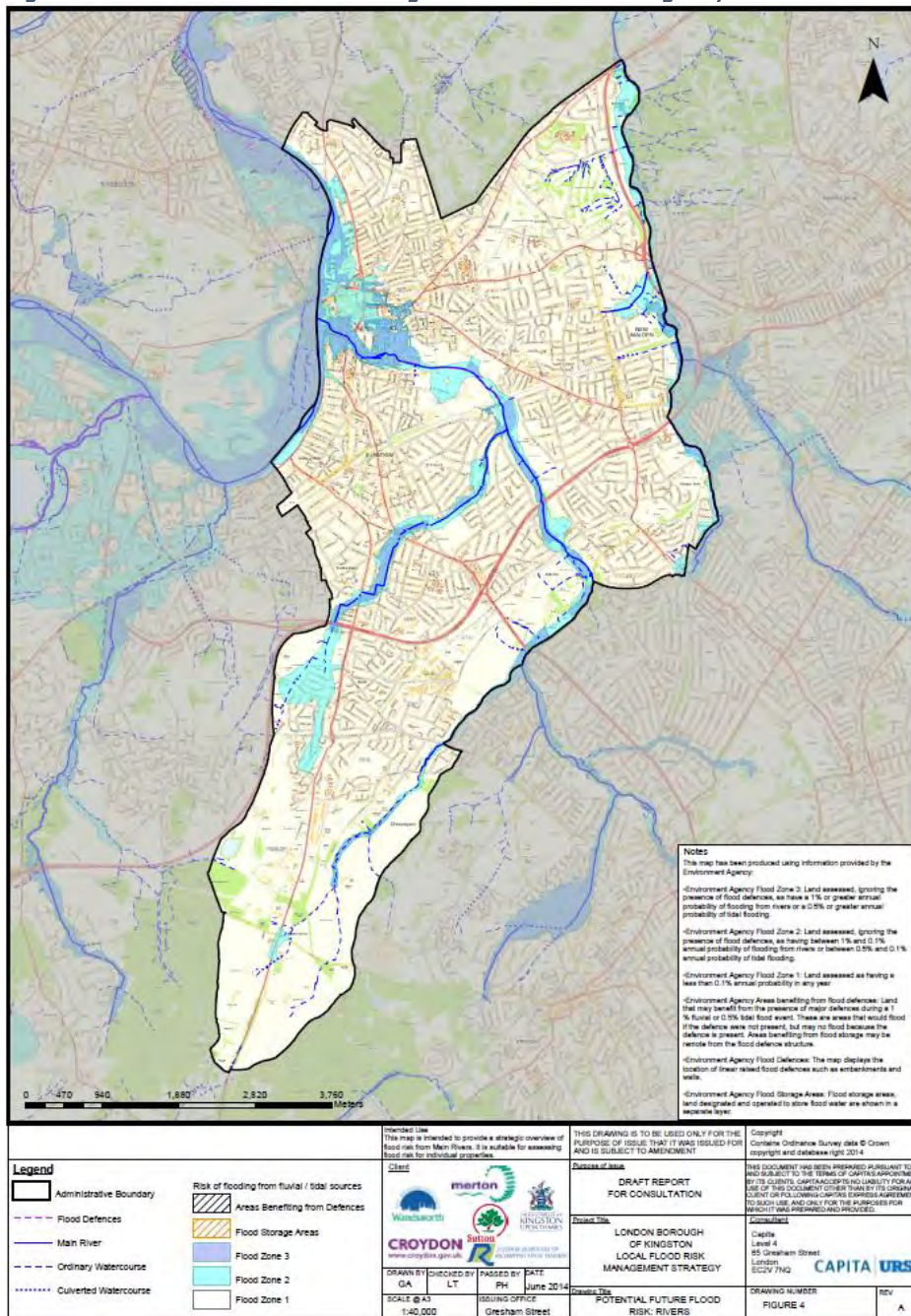


Table 6.49: Fluvial flood risk in Kingston - Properties located within EA Flood Zones

EA Flood Zone	Flood Risk	Dwellings	Non-Residential	Unclassified
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability (<0.1%)	<i>data not available</i>	<i>data not available</i>	<i>data not available</i>
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%)	<i>data not available</i>	<i>data not available</i>	<i>data not available</i>
Flood Zone 3a High Risk	More than 1 in a 100 annual probability (>1%)	<i>data not available</i>	<i>data not available</i>	<i>data not available</i>
Flood Zone 3b FuncFloodplain	More than 1 in 20 annual probability (>5% 'defended').	<i>data not available</i>	<i>data not available</i>	<i>data not available</i>

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.24: Surface water flood risk in Kingston based on the Government’s Risk of Flooding from Surface Water (RoFSW) map

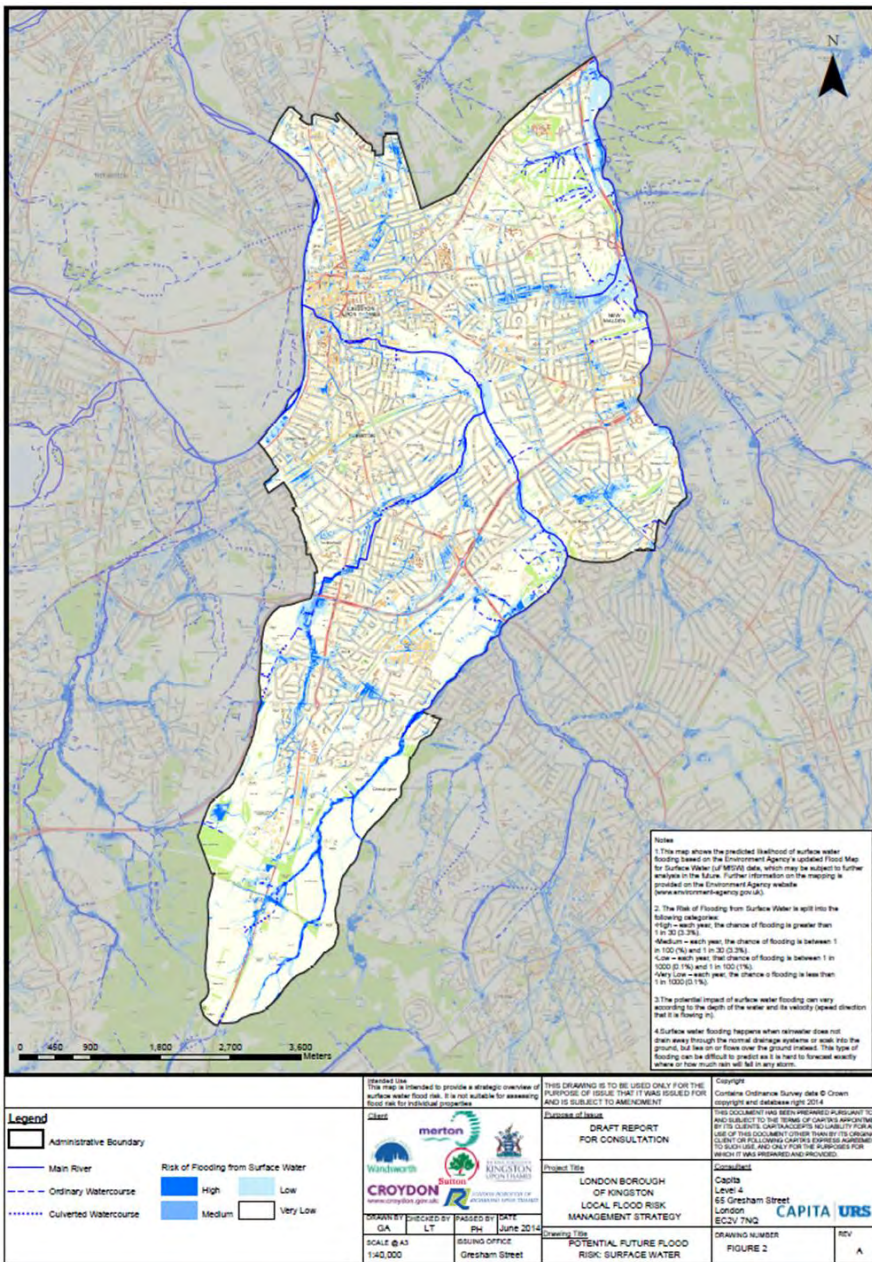


Table 6.50: Surface Water Flooding in Kingston: Dwellings at Risk in the 1 in 100 year event

RoFSW <sup>46</sup> Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability (<1%)	data not available	data not available	data not available
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	data not available	data not available	data not available
High	More than 1 in a 30 annual probability (>3.3%)	data not available	data not available	data not available

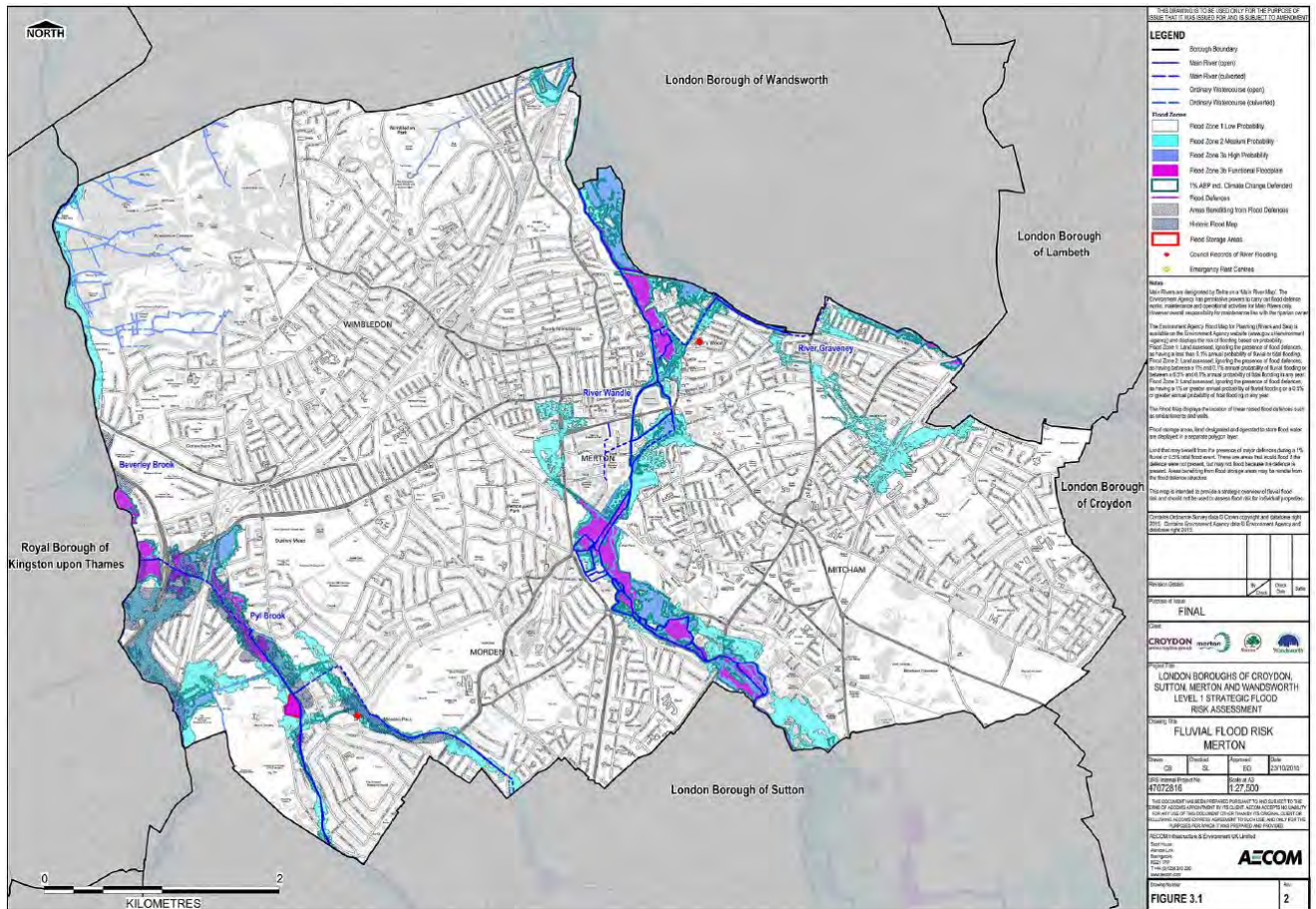
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

<sup>46</sup> based on the Government’s Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMSW))



**MERTON**

**Figure 6.25: Fluvial flood risk in Merton- Environment Agency Flood Zones**



Source: SFRA Level 1 Report (AECOM, December 2015)

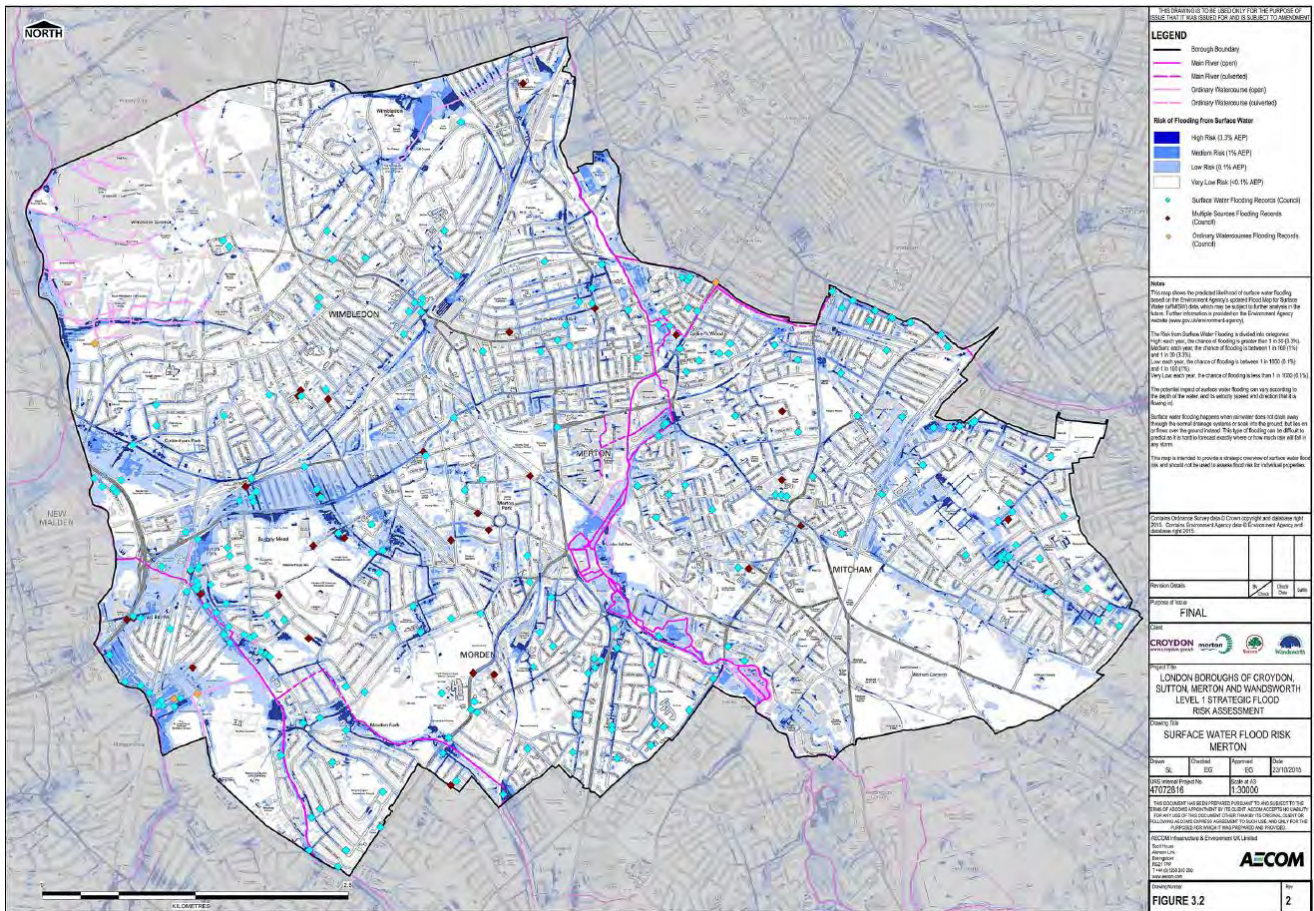
**Table 6.51: Fluvial flood risk in Merton – Properties located within EA Flood Zones**

EA Flood Zone	Flood Risk	Land Area of the Borough	Dwellings	Non-Residential	Unclassified
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability of flooding (<0.1%)	91.0%	78,864	3,698	6,496
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%)	5.2%	5,106	316	489
Flood Zone 3a High Risk	More than 1 in a 100 annual probability of flooding (>1%)	1.9%	1,272	101	136
Flood Zone 3b Functional Floodplain	More than 1 in 20 annual probability of flooding (>5% 'defended').	1.7%	254	20	61

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)



Figure 6.26: Surface water flood risk in Merton based on the Government’s Risk of Flooding from Surface Water (RoFSW) map



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.47: Surface Water Flooding: Dwellings at Risk in Merton in the 1 in 100 year event

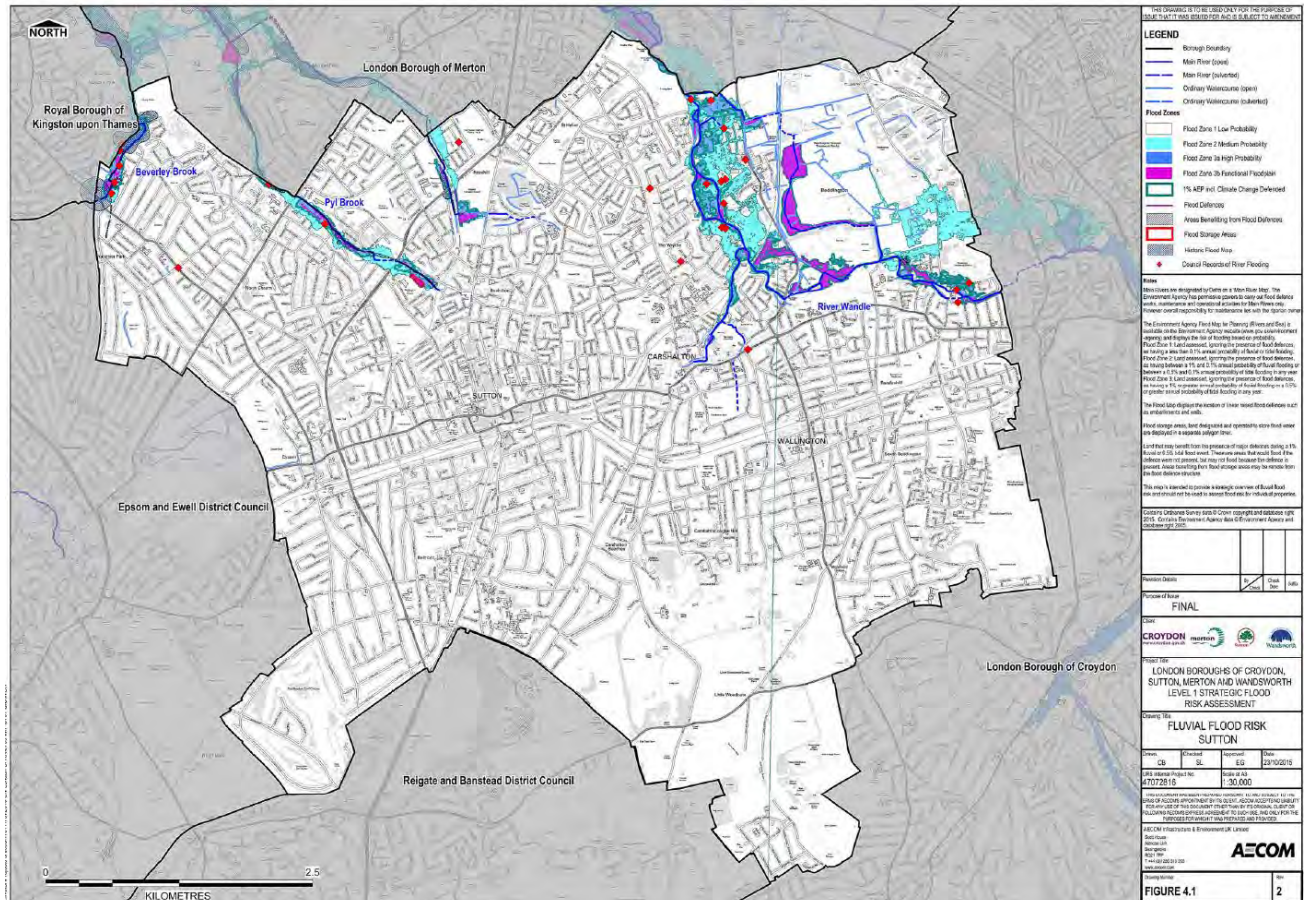
RoFSW Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability of flooding (<1%)	19,730	1,147	1,936
Medium	Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%)	4,361	439	190
High	More than 1 in a 30 annual probability of flooding (>3.3%)	1,668	176	247

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)



**SUTTON**

**Figure 6.27: Fluvial flood risk in Sutton - Environment Agency Flood Zones**



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

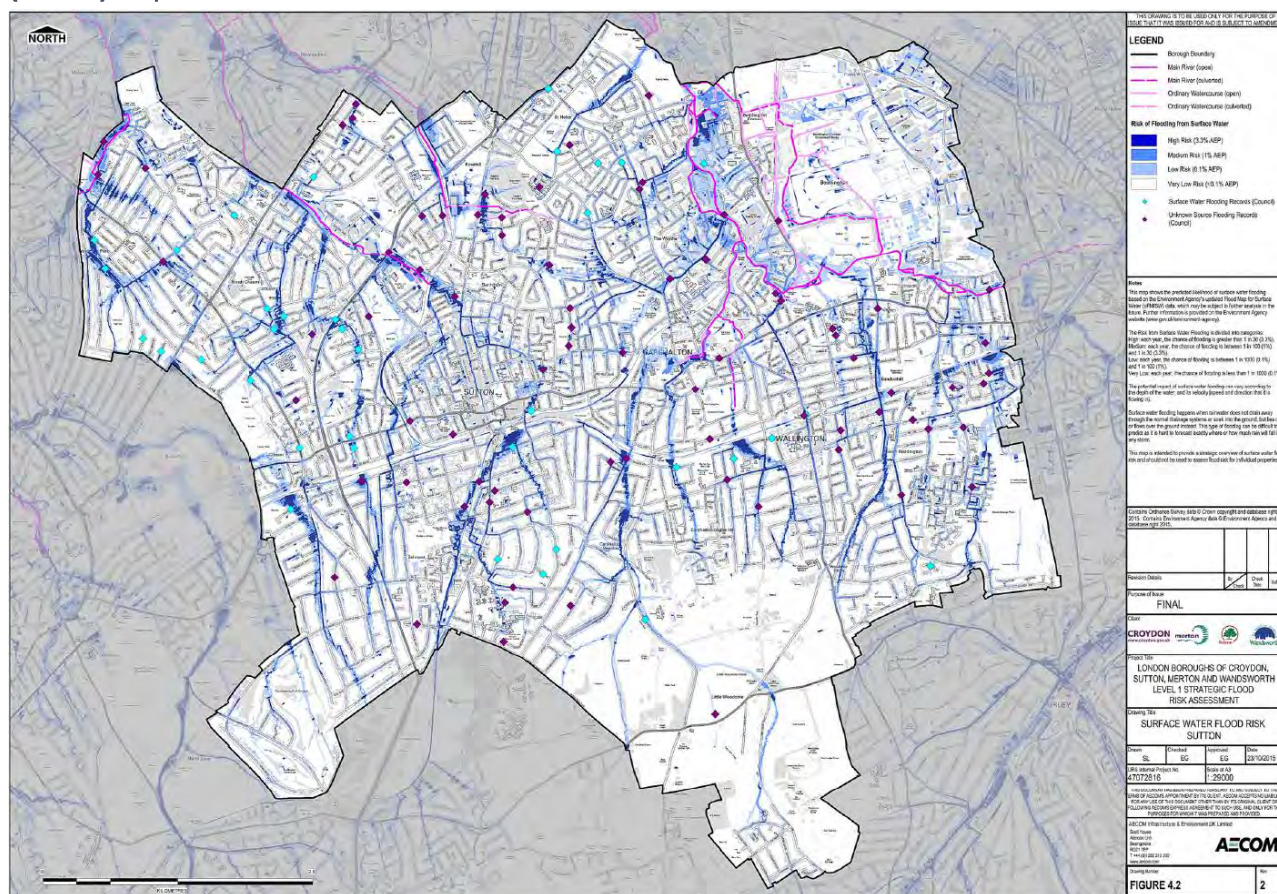
**Table 6.52: Fluvial flood risk in Sutton – Properties located within EA Flood Zones**

EA Flood Zone	Flood Risk	Land Area of the Borough	Dwellings	Non-Residential	Unclassified
<b>Flood Zone 1 Low Risk</b>	Less than 1 in a 1000 annual probability of flooding (<0.1%)	96.3%	76,352	3,236	5,699
<b>Flood Zone 2 Medium Risk</b>	Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%)	2.4%	1,889	167	181
<b>Flood Zone 3a High Risk</b>	More than 1 in a 100 annual probability of flooding (>1%)	1.0%	822	20	43
<b>Flood Zone 3b Functional Floodplain</b>	More than 1 in 20 annual probability of flooding (>5% 'defended').	0.2%	198	11	20

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)



Figure 6.28: Surface water flood risk in Sutton based on the Government’s Risk of Flooding from Surface Water (RoFSW) map



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.53: Surface Water Flooding in Sutton: Dwellings at Risk in the 1 in 100 year event

RoFSW Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability of flooding (<1%)	15,429	870	1,078
Medium	Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%)	4,287	325	303
High	More than 1 in a 30 annual probability of flooding (>3.3%)	2,860	267	219

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

## Sites of Importance for Nature Conservation (SINCs)

Table 6.54: Sites of importance for nature conservation (SINCs)

	Number of SINCs	SINC Area (ha)			SINC as percentage of borough
		Statutory Designations <sup>47</sup>	Non-Statutory	Total SINC	
Croydon	74	355 ha	1,245 ha	1,598 ha	18.5%
Kingston	38	46 ha	361 ha	405 ha	10.9%
Merton	57	322 ha	515 ha	836 ha	22.2%
Sutton	47	37 ha	634 ha	688 ha	15.7%

Source: Greenspace Information for Greater London (GiGL) (January 2019)

## Species, habitats and ancient woodland

Table 6.55: Species and habitats

	Number of species	Priority Habitats	Ancient Woodland (ha)
Croydon	2,914	9/9	318.7 ha
Kingston	2,105	8/9	31.6 ha
Merton	3,761	8/9	0 ha
Sutton	2,442	7/9	0 ha

Source: Greenspace Information for Greater London (GiGL) (January 2019)

## Green Belt and Metropolitan Open Land (MOL)

Table 6.56: Green Belt and MOL

	Green Belt		MOL		Green Belt + MOL as % of borough
	Area of Green Belt (ha)	Green Belt as % of borough	Area of MOL (ha)	MOL as % of borough	
Croydon	2,195	25.4%	413	4.8%	30.2%
Kingston	639	17.2%	545	14.6%	31.8%
Merton	0	0%	963	25.6%	25.6%
Sutton	605	13.8%	537	12.2%	26.0%
<b>SLWP</b>	<b>3,439</b>	<b>16.8%</b>	<b>2,458</b>	<b>12.0%</b>	<b>28.7%</b>
<b>LONDON</b>	<b>35,109</b>	<b>22.0%</b>	<b>15,681</b>	<b>9.8%</b>	<b>31.9%</b>

Source: Greenspace Information for Greater London (GiGL) (January 2019)

## Public Open Space and Urban Green Space

Table 6.57: Public open space and urban green space

	Number of Open Spaces	Open Space Area (ha)	Percentage of Open Space
Croydon	362	2,787	32.2%
Kingston	264	1,378	37.0%
Merton	327	1,330 ha	35.4%
Sutton	97	618 ha	15.7%

Source: Greenspace Information for Greater London (GiGL) (January 2019)

<sup>47</sup> SSSI, SPA, SAC, NNR, Ramsar or LNR

## Green Infrastructure

**Table 6.58: Blue and green space coverage for SLWP boroughs and within the plan area**

	Borough area (ha)	Green cover (ha)	Blue cover (ha)	Green & blue cover (ha)	Green cover (%)	Blue cover (%)	Green & blue cvr (%)
Croydon	8,649.4	4,802.8	11.6	4,814.4	55.5%	0.1%	55.7%
Kingston	3,726.1	1,953.4	39.3	1,992.7	52.4%	1.1%	53.5%
Merton	3,762.5	1,835.4	31.9	1,867.3	48.8%	0.8%	49.6%
Sutton	4,384.7	2,178.8	54.8	2,233.6	49.7%	1.2%	50.9%
<b>SLWP</b>	<b>20,522.7</b>	<b>10,770.4</b>	<b>137.6</b>	<b>10,908.0</b>	<b>52.5%</b>	<b>0.7%</b>	<b>53.2%</b>

## Conservation Areas and Historic Environment

**Table 6.59: Conservation Areas for SLWP boroughs and within the plan area**

	Conservation Areas	Areas of Special Local Character (ASLCs)	Listed Buildings Grade I, II or II* (at risk)	Locally listed buildings	Scheduled Ancient Monuments	Historic Parks and Gardens
Croydon	12	24	167 (6)	1,000 (apprx)	7	not available
Kingston	26 (277 ha)	15	161 (3) <sup>48</sup>	148	6	not available
Merton	28 (657 ha)	n/a	243	1,042	3	3
Sutton	15 (208.2 ha)	23	205 (6)	106	6	5

Source: Historic England and Local Plans

**Table 6.60: Archaeological Priority Areas: Croydon**

APA	Size	APA	Size
<b>TIER 1</b>			
Croham Hurst Round Barrow	0.66	Park Lane Anglo-Saxon Cmtry	1.31
Riddlesdown Road	6.37	Russell Hill	24.66
Farthing Down	85.92	Elmers End	3.97
Lion Green Road	3.55	RAF Kenley	78.95
<b>Tier 1 Total</b>			<b>205.39 ha</b>
<b>TIER 2</b>			
Addington and Addington Park	162.19	Pollards Hill	4.03
Central Croydon	90.25	Deepfield Way	1.95
Old Coulsdon	14.84	Hook Hill	14.99
Sanderstead	37.13	Cane Hill	79.27
Watendone	9.09	Ashburton Park	8.54
Ampere Way	126.69	Haling Grove	3.97
Waddon	65.93	Norwood Grove	9.99
Mere Bank	61.83	London to Brighton Roman Road	335.35
Addington Hills	104.36	London to Lewes Roman Road	37.54
Croham Hurst	82.36	Croydon 19th Century Cemeteries	14.35
Pampisford Road	31.49		
<b>Tier 2 Total</b>			<b>1,296.1 ha</b>
<b>TIER 3</b>			
Croydon Downs	1,672.15		
<b>Tier 3 Total</b>			<b>1,672.2</b>
<b>LB Croydon total</b>			<b>30 APAs</b>
<b>Area</b>			<b>3,173.7 ha</b>
<b>Percentage of Borough</b>			<b>36.7%</b>

<sup>48</sup> despite the small number of statutory listed buildings in Kingston, there are over 200 designated 'Buildings of Townscape Merit' (BTM)

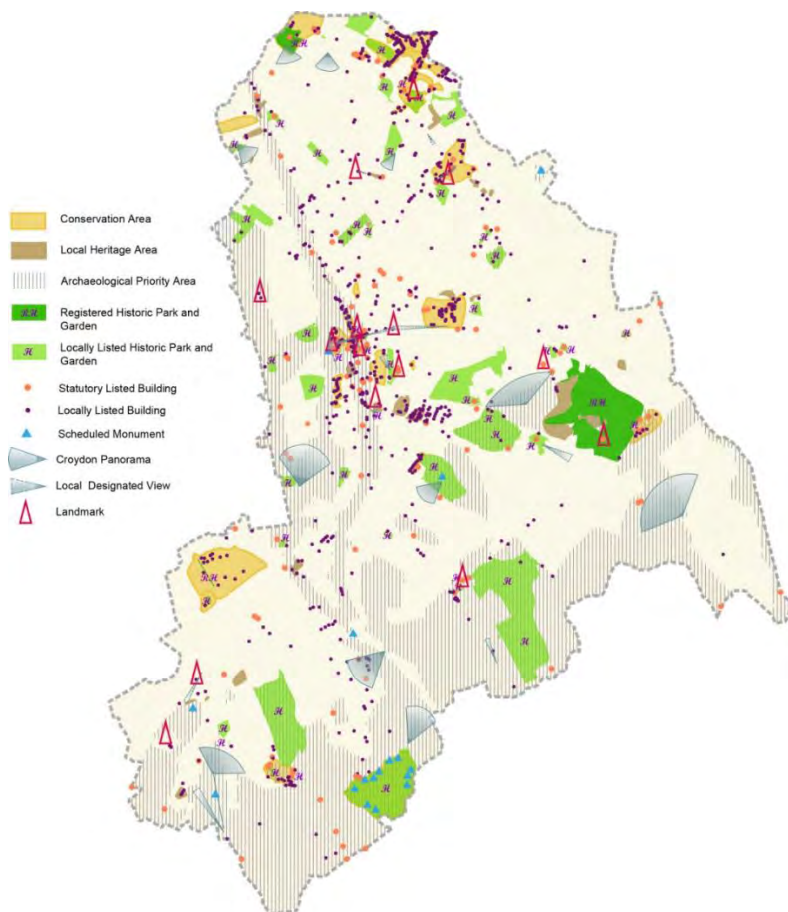


Table 6.61: Archaeological Priority Areas: Merton

APA	Size	APA	Size
<b>TIER 1</b>			
Caesar's Camp	27.35	Morden Park Mound	0.42
Merton Priory	10.28	Ravensbury Saxon Cemetery	10.79
<b>Tier 1 Total</b>			<b>48.84 ha</b>
<b>TIER 2</b>			
Wandle Valley / Colliers Wood	93.13	Cannizaro	67.64
Wandle Valley / Morden Hall Park	59.97	Cannon Hill	20.81
Wandle Valley / Mitcham	74.18	Merton Place	4.53
Wimbledon Common	237.41	Wimbledon Park House	90.07
Merton Village	47.48	Lavender Park	6.54
Mitcham	131.48	West Barnes Farm	5.22
Morden	48.41	Stane Street	47.84
Wimbledon Village	97.37	19 <sup>th</sup> Century Cemeteries	32.67
<b>Tier 2 Total</b>			<b>1.064.8 ha</b>
<b>TIER 3</b>			
Wandle Valley/Earlsfield	60.44	Mitcham Common	198.31
Beverley Brook	57.59		
<b>Tier 3 Total</b>			<b>316.34 ha</b>

<b>LB Merton total</b>	<b>23 APAs</b>
<b>Area</b>	<b>1,429.9 ha</b>
<b>Percentage of Borough</b>	<b>38.0%</b>

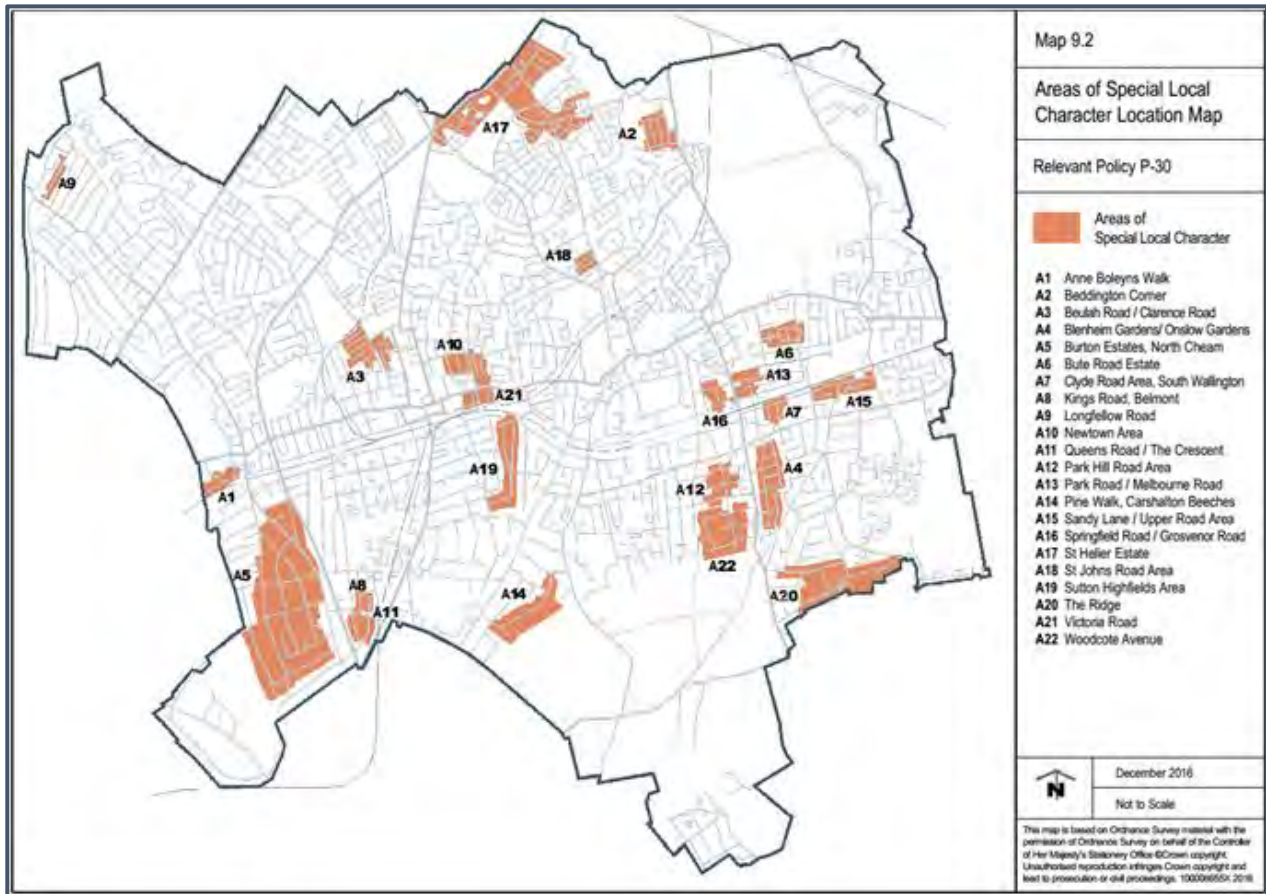
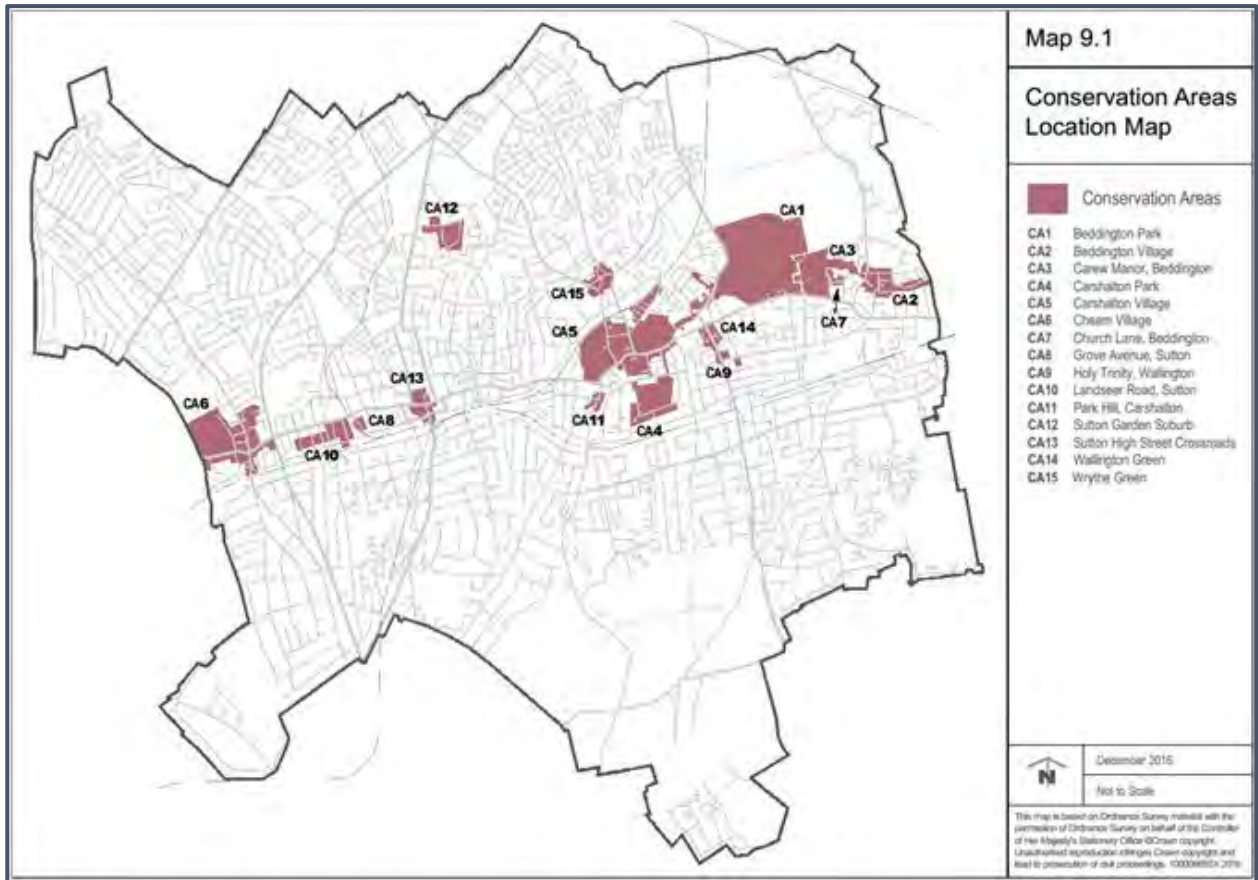
## Heritage Map of Croydon







# Heritage Maps of Sutton





## 7. Key Sustainability Issues (Task A3)

### Identifying key sustainability issues and problems

**7.1** This chapter sets out the key environmental, social and economic issues which need to be taken into account in preparing updated waste policies and proposals for inclusion in the new South London Waste Plan (SLWP). These have been identified on the basis of:

- key sustainability issues identified in government guidance on SA<sup>51</sup>, current best practice and criteria developed previously for the purpose of appraising the existing SLWP, Sutton's Local Plan 2018 and the Intend to Publish London Plan.
- other policies, plans, programmes and sustainability objectives relevant to or likely to be affected by the new plan as set out in Section 5 of this document;
- the current environmental, social and economic baseline for the four boroughs and future trends, including projected household growth and industrial land supply, over the plan period to 2036 (Section 6);
- existing and planned waste management facilities within South London, annual throughputs of local authority collected waste (household), commercial and industrial (C&I), construction, demolition and excavation waste (CD&E) and other waste streams; waste imports and exports to and from the plan area; and current performance against the London Plan 2016 apportionment (Section 3); and
- existing planning constraints and emerging opportunities for promoting sustainable waste management practices in south London.

**7.2** Further sustainability issues have been identified for inclusion in this chapter in the light of feedback from statutory consultees and the response to public consultation at the 'Issues and Preferred Options' stage.

### Issue 1: Sustainable Waste Management: Self-Sufficiency

**7.3** The key sustainability issues in relation to managing south London's waste arisings up over the plan period from 2021 to 2036 are as follows:

- how much additional land should the plan allocate for sustainable waste management to meet the combined apportionments for household and C&I waste<sup>52</sup> in the Intend to Publish London Plan (i.e. net self sufficiency) over the plan period?
- should the plan seek to either:
  - meet the new apportionment targets by safeguarding sufficient land and sites to manage 100% (and no more) of projected household and C&I waste arisings over the plan period to 2036? or
  - seek to further exceed the new apportionment targets by allocating additional land, promoting the intensification of existing sites or converting existing waste transfer facilities to waste management facilities?
- to what extent can the four boroughs seek to further reduce the level of waste exports to other waste planning authorities within the South East, particularly with regard to CD&E waste streams, given the available evidence on existing capacity and throughputs within the plan area and forecast arisings up to 2036;

<sup>51</sup> 'SA of Regional Spatial Strategies and Local Development Documents' (ODPM, November 2005)

<sup>52</sup> 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036



- how can the plan achieve an optimal balance between safeguarding sufficient land for waste management uses over the plan period and meeting the significant future demand for land for non-waste industrial uses, taking into account the borough classifications for the management of industrial floorspace capacity in the draft London Plan? (as detailed in Table 6.31 in Section 3, Sutton falls within the 'Provide Capacity' categorisation<sup>53</sup> and the remaining three boroughs fall within the 'Retain Capacity' categorisation);
- given that there is already sufficient capacity<sup>54</sup> within the four boroughs to manage forecasted construction and demolition waste arisings for the end of the plan period in 2036 (with a surplus of +5,895 tonnes per annum in 2036), to what extent – if at all – does the plan need to safeguard land for the management of future CD&E waste arisings?
- is there a need to allocate additional land, promote the intensification of existing sites within the plan area or make specific policy provisions for hazardous waste arisings in the new plan<sup>55</sup>;
- how should progress against the combined apportionment and self-sufficiency targets be monitored over the plan period, and what level of contingency needs to be planned for in the light of existing management capacity and forecasts for future waste arisings up to 2036?
- what account should be taken of the following considerations, each of which may lead to a significant reduction in household and C&I and CD&E waste arisings over the plan period:
  - the Mayor's annual housing delivery targets for each of the four partner boroughs in the Intend to Publish London Plan (December 2019) are now significantly lower than those included in the draft London Plan (December 2017);
  - the GLA's recently updated 'housing-led' and 'trend-based' population projections (2018-based) (February 2020)<sup>56</sup> would suggest that there will be a significantly reduced rate of population increase - and hence less waste being generated - within each of the four Boroughs over the period of the new SLWP;
  - the Covid-19 pandemic, which has led to the introduction of a 'lockdown' throughout the UK from 23 March 2020, is expected to have a hugely significant impact on economic activity and industrial output for many years to come. It is a reasonable assumption that future levels of waste generation, at least for the early years of the new SLWP, are likely to be much lower than the current forecasts would indicate.

## Issue 2: Sustainable Waste Management: Spatial Strategy and Strategic Approach

**7.4** The key sustainability issues are as follows:

- is the spatial strategy and strategic approach of safeguarding and intensifying existing sites the most appropriate strategy compared to the other reasonable alternatives of:
  - safeguarding existing sites and identifying new sites;
  - safeguarding existing sites and designating preferred industrial areas; or
  - safeguarding existing sites and designating all industrial areas as potential waste sites?
- which existing waste management sites and areas, including those with waste management facilities already in place, other sites allocated in the existing SLWP and industrial areas already identified as potentially suitable for waste facilities, should continue to be safeguarded and therefore carried forward in the new plan?

<sup>53</sup> according to the 'Intend to Publish' London Plan 2019 and the London Industrial Land Supply and Economy Study (CAG Consultants 2016), LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations over the London Plan period

<sup>54</sup> the revised throughput figures in Section 3 (Table 3.6) indicate that there is already a surplus of capacity for construction and demolition waste

<sup>55</sup> CD&E waste arisings in South London are projected to increase from 523,526 tpa in 2021 to 550,975 tpa in 2036

<sup>56</sup> the GLA's updated 'housing-led' and 'trend-based' population projections (2018-based) (Feb 2020) are set out in Figure 6.3 (Section 3)

- which waste sites identified in the existing SLWP have since been developed, permitted and/or allocated for other uses and can no longer contribute towards managing south London's waste?
- how can the waste management capacity of existing waste sites, particularly waste transfer sites, be optimised through the intensification of uses?
- which existing waste management sites and industrial areas identified as potentially suitable for waste facilities have potential for intensification and/or for converting existing waste transfer facilities to waste management operations?
- to what extent can existing waste management facilities, existing site allocations and industrial areas already identified as potentially suitable for waste facilities contribute to meeting the capacity gap over the plan period both with and without the intensification of existing operations?.
- what criteria should be used to evaluate the suitability of any new waste sites, areas suitable for waste facilities or proposals to increase the capacity of existing sites?
  - the nature of the activity, its scale and location;
  - implementation of the waste hierarchy and contribution to the circular economy;
  - achieving a positive carbon outcome<sup>57</sup>;
  - potential impacts on local amenity, including noise, odours, air quality and visual;
  - proximity to strategic routes and the impact of vehicle movements on local roads;
  - proximity to sustainable modes of transport;
  - physical and environmental constraints, including flood risk;
  - proximity to residential areas and other sensitive receptors;
  - job creation and social benefits, including skills, training and apprenticeships; and
  - potential for intensification or co-location with complementary industrial/waste uses.
- is the balance between the four boroughs in terms of waste management capacity appropriate given that Sutton (664,641 tpa) and Merton (213,179 tpa) currently manage a much larger share of household and C&I waste arisings than Kingston (35,642 tpa) and Croydon (32,883 tpa)?

## Issue 3: Sustainable Waste Management: Prevention, re-use, recycling and recovery

7.5 The key sustainability issues are as follows:

- how can the plan help to deliver a further shift towards practices towards the top of the government's waste hierarchy?
- can the plan further encourage minimisation and prevention through the reuse of materials and using fewer resources in the production and distribution of products?
- how can the plan contribute towards the following targets in the draft new London Plan and London Environment Strategy:
  - the equivalent of 100% of south London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
  - zero biodegradable or recyclable waste to landfill by 2026;
  - at least 65% recycling of municipal waste by 2030;
  - 95% reuse/recycling/recovery of construction and demolition waste; and
  - 95% beneficial use of excavation waste
- what scope exists for the plan to support even higher recycling targets for municipal waste than the 65% target set out in the London Environment Strategy ?

<sup>57</sup> the draft new London Plan requires that all energy from waste (EfW) facilities must demonstrate a minimum performance of 400g of CO<sub>2</sub> equivalent per kilowatt hour of electricity produced

## Issue 4: Sustainable Waste Management: Promoting the Circular Economy

7.6 The key sustainability issues are as follows:

- can the plan help to promote a transition to a circular economy within south London that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible?
- how can the potential economic benefits of the plan be maximised in terms of job creation and supporting the local manufacturing sector by achieving resource efficiency, waste reduction and a significant improvement in reuse and recycling performance<sup>58</sup> (reuse, repair, re-manufacturing and materials innovation)?
- should the plan support the co-location of complementary uses such as secondary material processing facilities in order to support manufacturing from waste?
- can the plan support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets?
- should the plan consider introducing a requirement for all major planning applications to achieve 'net zero-waste' and be supported by a Circular Economy Statement?
- should the plan seek to promote technologies that produce fuels that can be used to power waste management and industrial processes (e.g. biofuels and hydrogen)?

## Issue 5: Climate Change Mitigation

7.7 The key sustainability issues are as follows:

- should the policies and proposals of the plan be 'technology neutral' or promote specific technologies?
- should the policies and proposals of the plan actively promote opportunities to use residual waste arisings in south London as a renewable source of energy to power complementary waste management or other industrial processes?
- in the context of the current 'climate emergency'<sup>59</sup>, should the plan go beyond current London Plan policy requirements to further minimise CO<sub>2</sub> emissions on-site through application of the Mayor's updated energy hierarchy and achieve zero carbon standards through developer contributions to a council-managed carbon offset fund?
- should policy measures be included to minimise embodied energy and the 'carbon footprint' associated with construction materials used for new waste management facilities as measured by the BRE's<sup>60</sup> Building life cycle assessment' methodology.

## Issue 6: Climate Change Adaptation

7.8 The key sustainability issues are as follows:

- how can the design and layout of new waste management facilities incorporate green infrastructure and maximise its benefits for a range of adaptation objectives, including flood risk management, urban cooling, mitigation the impact of drought conditions, maintaining biodiversity and habitats and environmental enhancement?
- to what extent can the design and layout of new or upgraded waste management facilities minimise overheating and contribution to the urban heat island (UHI) effect, for example by

<sup>58</sup> 'Towards a circular economy, LWARB 2015 and Employment and the circular economy – job creation through resource efficiency in London' (LWARB 2015) available at <http://www.lwarb.gov.uk/what-we-do/accelerate-the-move-to-a-circular-economy-in-london/>

<sup>59</sup> in July 2019, the London Borough of Sutton declared a climate emergency and a borough target to achieve net zero carbon by 2030

<sup>60</sup> Building Research Establishment

permeating the development with blue and green spaces and incorporating a range of natural cooling measures as part of the design and layout, including passive design measures (e.g. building orientation), shading, planting and soft landscaping, trees, ponds, SUDS measures and other surface water features?

- the need for the plan to support continued partnership working with the Environment Agency (EA) to ensure waste management infrastructure is fit for purpose and resilient to a changing climate and to support a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process;
- should the plan set minimum green infrastructure targets for all new or upgraded waste management facilities and require green roofs wherever feasible? and
- what contribution can the plan make towards the Mayor's long-term target for more than 50% of London to be green by 2050?

## Issue 7: Flood risk, sustainable drainage (SuDS) and water resources

**7.9** The key sustainability issues are as follows:

- what additional policy measures should be included to minimise all sources of flood risk to and from new and existing waste management sites in south London and to reduce flood risks overall, taking climate change into account?
- to what extent can the 'sequential' and 'exceptions tests' be applied to the identification of waste management sites for inclusion in the new plan, taking account of the latest available information on flood risk in south London<sup>61</sup>?
- should the plan include further policy measures to require all waste proposals to incorporate SuDS measures and achieve greenfield run-off rates and volumes?
- how can any residual flood risks arising from waste management sites be safely mitigated through the use of flood resistance or resilience measures where required?
- how can the plan help to ensure that waste facilities and related activities do not adversely affect the quality of watercourses or groundwater within south London?
- how can the plan promote water efficiency measures in existing and new waste facilities having regard to the proximity of vulnerable natural water stores

## Issue 8: Sustainable design and construction

**7.10** The key sustainable design and construction issues are as follows:

- should the plan set a minimum BREEAM rating<sup>62</sup> to be met by all new waste management facilities or should this policy requirement take account of the nature of the proposed facility (e.g. sorting and baling facility only, shell buildings or the full-scale redevelopment of a large site)?
- what alternative accreditation methods could be used in place of BREEAM to demonstrate the environmental performance of newly proposed waste management facilities e.g. the CEEQUAL scheme<sup>63</sup> developed by the Building Research Establishment (BRE) for infrastructure projects?

<sup>61</sup> based on the joint strategic flood risk assessment (SFRA) Level 1 and Level 2 reports for Croydon, Merton, Sutton and Wandsworth (AECOM, 2015), the EA's flood map for planning and 'Risk of Flooding from Surface Water (RoFSW)' map

<sup>62</sup> the appropriate scheme is currently the BREEAM New Construction 2018

<sup>63</sup> the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at <https://www.ceequal.com/>

- should the plan seek to further minimise environmental life cycle impacts by requiring developers to conducting Life Cycle Assessment and integrating its outcomes in the design decision-making process?
- should the plan include policy criteria to further minimise environmental impacts from construction products<sup>64</sup>?
- should the plan further encourage responsible sourcing of construction products?
- should the plan include policy measures to increasing the lifespan of the waste-related buildings through designing for durability and adaptability? and
- should the plan include policy criteria to encouraging the reduction of environmental impacts through optimising the use of materials during all stages of the project?

## Issue 9: Transport

**7.11** The key sustainable design and construction issues are as follows:

- what further policy measures are needed to minimise HGV movements, traffic congestion, greenhouse gas emissions, local air pollution, noise and vibration associated with waste-related transport within south London?
- to what extent can the plan support sustainable transport objectives by:
  - locating waste management facilities close to where waste is produced?
  - maximising opportunities for the intensification of existing waste sites and industrial areas identified as potentially suitable for waste facilities thus avoiding the need for new waste management sites to be developed and associated trips?
  - co-locating complementary waste management or secondary material processing facilities in line with circular economy principles?
- how can the plan minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors?
- is the capacity and condition of the existing local and strategic road network within south London sufficient to accommodate the expected growth in waste-related trips associated with dealing with south London's waste apportionment up to 2036?
- the need to take account of cumulative impacts on the local and strategic road network;
- contributions may be requested towards improvements that support travel for staff on foot, cycle or by public transport where appropriate. Furthermore, cycle parking and car parking, including the provision of electric charging facilities, should be in line with the draft London Plan policies T5 and T6?
- the need to ensure that safeguarded waste sites do not conflict with the planned Crossrail 2 southern hub at Wimbledon; and
- how can the plan increase the potential role of sustainable modes of transport e.g. rail in transporting south London's waste arisings?

## Issue 10: Air Quality

**7.12** The key sustainability issues in relation to air quality are:

- how can the policies and proposals of the plan further mitigate the potential impacts of local air pollution arising both from the operation of new and existing waste management facilities and associated transport movements?

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<sup>64</sup> for example through requiring submission of Environmental Product Declarations (EPD)



- how can the plan contribute towards improving air quality within identified Air Quality Management Areas (AQMAs) and other areas where national standards for particulates (PM10) and nitrogen oxides (NO<sub>x</sub>) are currently being breached?
- what further policy requirements should be incorporated as part of the plan to ensure that proposed waste developments within south London are at least 'air quality neutral' based on the emissions benchmarks set out in the Mayor's Sustainable Design and Construction SPG?
- how can the policies and proposals of the plan promote the use of design solutions, such as green infrastructure and screening, to prevent or minimise increased exposure to existing air pollution?
- to what extent can the plan require potentially polluting waste management operations such as the sorting of recyclables to be enclosed?
- in seeking to mitigate the potential impacts of local air pollution, can the plan maintain a 'technology neutral' approach to the development of waste management facilities? And;
- to what extent should the plan should allocate broad types of facility to each site e.g. enclosed or open?

## Issue 11: Environmental protection

**7.13** The key issues in relation to minimising the potentially adverse impacts of waste management facilities on environmental quality and local amenity are as follows:

- should the plan include policy criteria to mitigate the adverse effects of noise, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?
- what locational criteria should be used to assess the suitability of new waste management facilities in terms of the proximity of sensitive receptors to noise, vibration and odours generated during both the construction and operational phases;
- should the plan set out common requirements in relation to the content of Construction Environmental Management Plans submitted in support of proposals for new waste management facilities across the four partner boroughs?
- how can the plan limit potential pollution associated with the operation of waste management facilities and its potentially adverse impacts on neighbouring uses?
- what further policy measures should be included to reduce the number and total area of contaminated sites within south London requiring remediation? and
- what further policy measures or criteria should be included in the plan to further prioritises the re-use of previously-developed ('brownfield'), derelict or underused land/ premises within south London for waste management uses?
- how should the new plan incorporate the 'agent of change' principle, as set out in national and regional planning policy, in order to ensure that new sensitive developments located close to established waste uses are required to incorporate appropriate mitigation measures in order to minimise potential adverse environmental impacts on occupants;
- the need to take account of high voltage overhead lines and the high pressure gas grid in identifying new or intensified waste sites.

## Issue 12: Biodiversity and Habitats

**7.14** The key sustainability issues in relation to biodiversity and habitats are as follows:

- is the plan likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?

- what approach should be followed in screening the plan at the issues and options stage to determine whether or not a Habitats Regulations Assessment (HRA)<sup>65</sup> needs to be carried out?
- which European sites are in sufficiently close proximity to the south London plan area to be considered for the purpose of HRA screening? Richmond Park SAC; Wimbledon Common SAC; Mole Gap to Reigate Escarpment SAC; and/or Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA)?
- how should the plan ensure that new and existing waste management facilities minimise any potential impacts upon regionally or locally designated wildlife sites?
- how will the plan potentially affect local Biodiversity Action Plan (BAP) targets in relation to priority habitats and species within each of the four partner boroughs; and
- how can the waste plan maximise the area of habitat created, improved or managed as a consequence of waste related developments and promote opportunities for enhancing river catchments and local green corridor networks.

## Issue 13: Local Economy and Employment

**7.15** The key sustainability issues are as follows:

- how can the plan's effectiveness be maximised in promoting investment, local employment opportunities and the competitiveness of the waste management sector within South London, particularly by promoting the circular economy and new waste management technologies nearer the top of the waste hierarchy?
- in order to ensure that employment land supply matches demand across the four boroughs, and given that most industrial uses<sup>66</sup> have a significantly higher jobs density than waste management uses, should the plan seek to retain employment land for industrial uses within strategic industrial locations (SIL) and established industrial areas, and therefore no longer identify these areas as potentially suitable for waste management uses (provided that sufficient sites can be allocated to meet the apportionment up to 2036)
- how much industrial land and floorspace within the four south London boroughs and across the wider Wandle Valley Property Market Area (including Wandsworth) should be retained or potentially released for waste related uses having regard to (a) the need to maintain a sufficient supply of land and premises to meet current and future demands for industrial (non-waste-related) and related functions; and (b) the borough-level categorisations in Table 6.2 of the London Plan which identifies that Sutton should 'provide capacity' and that the other three boroughs should 'retain capacity' for non-waste related industrial uses.
- to what extent should the plan promote co-ordination initiatives with London Remade and other partners to ensure that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?
- in promoting south London's transition towards a circular economy, how can the plan maximise economic benefits to local communities in the form of new products and employment, for example through managing waste more locally by optimising existing facilities and building new reuse and recovery facilities?
- what is the potential contribution of the plan in promoting south London's economy, facilitating innovation and competitiveness and supporting existing businesses to expand and new business to start-up (particularly SMEs).

<sup>65</sup> also known as 'Appropriate Assessment'

<sup>66</sup> these are generally uses falling within the Use Classes B1(b) research & development, B1(c) light industrial; B2 industrial and manufacturing; and B8 storage & distribution and therefore appropriate forms of development within SILs and established industrial areas

## Issue 14: Historic Environment, Townscape and Visual Amenity

**7.16** The key sustainability issues are as follows:

- how can the plan ensure that new and existing waste management facilities do not adversely impact upon the historic environment of the four boroughs – specifically the character, appearance and setting of Conservation Areas; Areas of Special Local Character (ASLCs); listed buildings, historic parks and gardens, scheduled ancient monuments (SAMs) and Archaeological Priority Areas?
- how can the plan ensure that the plan preserves and enhances the quality and distinctiveness of south London’s historic environment and cultural assets?
- the need to conserve and enhance designated and non-designated heritage assets (including archaeology) and the contribution made by their settings;
- how can the plan avoid increasing the number of heritage assets at risk from neglect, decay or development pressures?
- How can the plan protect areas where there is likely to be a further significant loss or erosion or landscape/townscape character or quality, or where development has had or is likely to have a significant impacts (direct or indirect) upon the historic environment and/or people’s enjoyment of it?
- how can the plan avoid adverse effects upon the historic environment arising from traffic congestion, air quality, noise pollution and other issues?
- how can the plan ensure that new and existing waste management facilities are constructed to high quality design principles that respect local character and do not adversely affect local townscape? and
- how can the plan minimise the number of new waste management facilities located within areas of designated landscape value?

## Issue 15: Human Health and Quality of Life

**7.17** The key sustainability issues are as follows:

- how should the plan protect and enhance local amenity and the quality of the townscape for residents living near new and existing waste management facilities?
- how should the plan minimise the potentially adverse impacts of waste developments, transport and associated activities on public health and promote ‘Healthy Streets’ principles in line with the Mayor’s Transport Strategy?
- how can the plan minimise potential conflicts with vulnerable road users and the risk of accidents involving waste vehicles in line with the Mayor’s Vision Zero approach and ensure the safe operation of waste management facilities for employees and visitors?
- should the plan include a requirement for proposed waste developments to be accompanied by a Delivery and Servicing (DSP) plan?
- how can the design and layout of waste management facilities integrate ‘designing out crime’ principles and contribute to public perceptions of safety?
- how can the policies and proposals of the plan help to ensure that new or upgraded waste management facilities within south London promote inclusive designs
- how can the amenity and quality of life of local residents be balanced against the operational requirements of new or upgraded waste management facilities within south London, particularly within areas affected by social deprivation
- is the current level of protection for the permanence, integrity and openness of Green Belt and Metropolitan Open Land (MOL) within the four boroughs sufficient?

- how should the plan minimise the loss of public open space and ensure that there is no increase in the area of public open space deficiency as a consequence of waste development?
- should the plan include policy criteria to further minimise potential visual intrusion of waste related developments on nationally or locally important landscapes?
- how can the plan tackle waste crime (in 2015, illegal waste activity was estimated to have cost over £600 million in England alone)? and
- how can the plan ensure that waste related developments do not adversely affect strategic views from within and from outside the plan area?

## Issue 16: Equalities, Accessibility and Social Inclusion

**7.18** The key sustainability issues are as follows:

- what criteria should be identified as the basis for carrying out an Equalities Impact Assessment (EqIA) on the emerging plan?
- how can the plan enhance public access for all groups of the population, including equalities groups, to reuse and recycling centres accepting household waste in South London?
- how can the plan further promote social inclusion by addressing potential inequalities arising as a result of current waste management arrangements in south London.
- In what ways can the plan address fuel poverty issues?
- should the plan maximise the potential for locating waste management facilities within easy access of areas of social deprivation (as measured by the employment and income domains of the Government's Index of Multiple Deprivation) and thus providing new employment opportunities in the waste management sector?
- how can the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?
- what is the potential contribution of the plan to achieving an increase in public awareness of sustainable waste management issues?
- what benefits can the plan deliver to local communities in the form of new products and employment, for example by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?
- how can the policies and proposals of the plan help to address inequalities, particularly within deprived areas, encourage social cohesion and promote inclusive neighbourhoods? and
- how can the plan help to promote job opportunities for all?

## 8. Sustainability Appraisal Framework for the South London Waste Plan (Task A4)

### Developing Sustainability Objectives, Indicators and Targets

**8.1** A comprehensive range of sustainability objectives, indicators and targets has previously been identified through the SA Scoping Report and subsequently at the issues and preferred options stage (with minor amendments) for the purpose of appraising emerging plan options. The finalised SA Framework, which has been carried forward in this report, has been developed on the basis of other policies, plans, programmes identified in Section 5 (Task A1); the environmental baseline in Section 6 (Task A2); and the key issues identified in Section 7 (Task A3). As shown in Table 8.2 overleaf, the SA Framework consists of 16 broad topic areas reflecting the aims of national planning policy, the Mayor's Environmental Strategy, the Intend to Publish London Plan and local planning objectives. These are arranged under the categories of (a) sustainable waste management (b) climate change (c) environmental quality, and (d) community well-being.

**8.2** The full SA Framework, including sustainability objectives, appraisal questions, indicators and a cross reference to the key issues identified in Section 7, is set out in Table 8.3. It should be noted that the SA Framework overlaps to some extent with the SLWP Monitoring and Contingency Table included as Appendix 1 of the draft plan, particularly in relation to the waste hierarchy and self-sufficiency targets for South London.

#### Scoring system

**8.3** The scoring system for use in the appraisal of preferred policy options and strategic alternatives, including significance ratings, is set out below in Table 8.1.

**Table 8.1: Scoring system for use in the appraisal**

Symbol	Scale of effect
+++	Large beneficial impacts
++	Medium beneficial impacts
+	Smaller beneficial impact
-	Neutral or no impact
x	Smaller negative impact
xx	Large negative effect.
?	Uncertain impact and/or the nature and magnitude of the impact is subject to the implementation of other planning policies.

#### Plan monitoring

**8.4** In order to address the requirement for plan monitoring in the national planning policy framework (NPPF) and feedback received at the issues and preferred options stage, a 'Monitoring and Contingency Table' has been included in Appendix 1 of the draft Plan (Submission Version). Annual reporting of the indicators and targets in the Monitoring and Contingencies Table will take place through the preparation of Sutton's Authority Monitoring Report (AMR).

**8.5** The SA Framework developed through the sustainability appraisal process has helped to ensure that the Monitoring and Contingencies Table covers an appropriate range of indicators.




Table 8.2: Summary of the SA Framework

<b>(A) SUSTAINABLE WASTE MANAGEMENT</b>
<p><b>(1) Net Self-sufficiency</b> To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period.</p> <p><b>(2) Spatial Strategy and Strategic Approach</b> To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land.</p> <p><b>(3) Waste re-use, recycling and recovery</b> To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery</p> <p><b>(4) Circular economy</b> To promote a transition to a circular economy within south London.</p>
<b>(B) CLIMATE CHANGE</b>
<p><b>(5) Climate Change Mitigation</b> To address the causes of climate change by minimising CO2 emissions from waste facilities.</p> <p><b>(6) Climate Change Adaptation</b> To ensure that all waste management facilities are fully adapted to the impacts of climate change.</p> <p><b>(7) Flood risk and sustainable drainage (SuDS)</b> To avoid, reduce and manage flood risk to or from waste management facilities.</p> <p><b>(8) Sustainable Design and Construction</b> To promote the highest standards of sustainable design and construction in new waste facilities.</p>
<b>(C) ENVIRONMENTAL QUALITY</b>
<p><b>(9) Transport</b> To reduce trips, traffic congestion and pollution arising from waste -related HGV movements.</p> <p><b>(10) Air Quality</b> To minimise air pollution and impacts on sensitive land-uses arising from waste facilities.</p> <p><b>(11) Environmental protection</b> To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases.</p> <p><b>(12) Biodiversity and Habitats</b> To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive.</p>
<b>(D) COMMUNITY WELL-BEING</b>
<p><b>(13) Local Economy and Employment</b> To promote local employment opportunities, and the competitiveness of the waste management sector within South London.</p> <p><b>(14) Historic Environment, Townscape and Visual Amenity</b> To avoid the potentially adverse impacts of waste management facilities on the historic environment, townscape quality and visual amenity by promoting high standards of design and layout.</p> <p><b>(15) Human Health and Quality of Life</b> To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment.</p> <p><b>(16) Equalities, Accessibility and Social Inclusion</b> To reduce exclusion, address inequalities &amp; improve accessibility for all equalities target groups.</p>

## SA FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN

SA Objective	Appraisal Questions	Indicators	Issue Ref
<b>(A) SUSTAINABLE WASTE MANAGEMENT</b>			
<p><b>Objective 1: Net self-sufficiency</b> To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to provide sufficient sites and waste management facilities in south London to meet the combined apportionment targets<sup>69</sup> for household and commercial &amp; industrial (C&amp;I) waste over the plan period?</i></li> <li>➤ <i>Will the policy or proposal help to provide sufficient sites and waste facilities to manage other waste arisings, including construction, demolition &amp; excavation (CD&amp;E) waste and hazardous waste, over the plan period?</i></li> <li>➤ <i>Will the policy or proposal reduce waste arisings needing to be managed by promoting waste reduction, reuse and manufacturing from waste?</i></li> <li>➤ <i>Will the policy or proposal reduce the proportion of recyclable waste exported outside the plan area?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ current and future household, C&amp;I, CD&amp;E and hazardous waste arisings in south London over the plan period (tpa)</li> <li>➤ number, site area (ha) and capacity (tpa) of new and existing waste management facilities within south London by facility type and waste stream.</li> <li>➤ combined tonnage of household and C&amp;I waste managed within south London as a proportion of total arisings and the London Plan apportionment (tpa) (%)</li> <li>➤ tonnage of other waste streams managed as a proportion of arisings, including CD&amp;E and hazardous waste (%).</li> <li>➤ number of allocated and windfall sites developed for new waste management facilities, intensification of uses or for manufacturing from waste respectively (ha)</li> <li>➤ tonnage of recyclable waste exported outside area (tpa)</li> </ul>	Section 7, Page 91
<p><b>Objective 2: Spatial strategy and strategic approach</b> To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to optimise and intensify the capacity of waste management sites and other industrial uses within south London compared to reasonable alternatives?</i></li> <li>➤ <i>Will the policy or proposal facilitate linked trips and optimise the location of new waste facilities with respect to proximity to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors?</i></li> <li>➤ <i>Will the policy or proposal optimise the distribution of waste management sites within south London?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ number of sites and area of employment land intensified for waste management uses, complementary uses such as manufacturing from waste or other industrial uses (ha)</li> <li>➤ increased tonnage of waste managed on intensified waste sites by waste stream (LACW, C&amp;I and CD&amp;E) &amp; total (tpa)</li> <li>➤ number and area of existing waste transfer sites converted to waste management operations (ha)</li> <li>➤ proximity (m) of new or upgraded sites to strategic routes, sustainable modes of transport, physical/ environmental constraints, residential areas and other sensitive receptors</li> </ul>	Section 7, Page 92

<sup>69</sup> the apportionment set out in draft London Plan 2019 (887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 & 929,750 by 2036)

SA Objective	Appraisal Questions	Indicators	Issue Ref
<p><b>Objective 3: Waste re-use, recycling and recovery</b> To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery</p>	<p>➤ <i>Will the policy or proposal help to deliver a shift away from waste disposal towards practices towards the top of the government's waste hierarchy?</i></p> <p>(i) <i>Prevention;</i> (ii) <i>Preparing for Re-Use;</i> (iii) <i>Recycling;</i> (iv) <i>Recovery;</i> (v) <i>Disposal.</i></p> 	<p>➤ tonnage and proportion of south London's waste arisings respectively prepared for re-use, recycled or recovered by waste stream (tpa) (%)</p> <p>➤ number and proportion of waste developments achieving a shift away from waste disposal towards practices towards the top of the government's waste hierarchy</p> <p>➤ tonnage and proportion of biodegradable or recyclable waste sent to landfill (tpa) (%)</p> <p>➤ tonnage and proportion of household and C&amp;I waste recycled (tpa) (%)</p> <p>➤ tonnage and proportion of CD&amp;E waste re-used, recycled or recovered (tpa) (%)</p> <p>➤ proportion of excavation waste put to beneficial uses (%)</p> <p>➤ performance against the following revised targets for re-use, recycling and recovery in the new London Plan</p> <ul style="list-style-type: none"> <li>- the equivalent of 100% of south London's waste is managed within the plan area by 2026 for all waste streams except excavation waste;</li> <li>- zero biodegradable or recyclable waste to landfill by 2026;</li> <li>- at least 65% recycling of municipal waste by 2030;</li> <li>- 95% reuse/recycling/recovery of construction and demolition waste; and</li> <li>- 95% beneficial use of excavation waste</li> </ul>	<p>Section 7, Page 93</p>

SA Objective	Appraisal Questions	Indicators	Issue Ref
<p><b>Objective 4: Circular economy</b> To promote a transition to a circular economy within south London</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal promote the circular economy within south London?</i></li> <li>➤ <i>Will the policy or proposal improve efficiency and innovation to keep products and materials at their highest use for as long as possible?</i></li> <li>➤ <i>Will the policy or proposal support manufacturing from waste and the co-location of complementary uses in industrial areas e.g secondary material processing?</i></li> <li>➤ <i>Will the policy or proposal promote technologies that produce fuels that can be used to power waste management and industrial processes?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ number and proportion of planning applications for waste management facilities supported by a Circular Economy Statement</li> <li>➤ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%)</li> <li>➤ number and capacity of manufacturing from waste facilities developed within south London (tpa)</li> <li>➤ number and capacity of waste facilities developed producing fuels that can be used to power waste management and industrial processes (tpa)</li> </ul>	Section 7, Page 94
<b>(B) CLIMATE CHANGE</b>			
<p><b>Objective 5: Climate Change Mitigation</b> To address the causes of climate change by minimising CO<sub>2</sub> emissions from waste facilities</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal minimise regulated and unregulated CO<sub>2</sub> emissions from the operation of waste management facilities and ancillary buildings?</i></li> <li>➤ <i>Will the policy or proposal minimise embodied energy and the 'carbon footprint' associated with construction materials used for new or upgraded waste facilities?</i></li> <li>➤ <i>Will the policy or proposal promote technologies producing fuels that can be used to power waste management and industrial processes?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ net carbon dioxide (CO<sub>2</sub>) reductions delivered by waste management facilities and ancillary buildings (tpa)</li> <li>➤ number and proportion of waste facilities (a) achieving BREEAM 'Excellent'; and (b) minimising embodied energy under the BRE's Building life cycle assessment' methodology</li> <li>➤ number and proportion of waste facilities achieving an 'Excellent' rating under the BRE's 'CEQUAAL' accreditation scheme.</li> <li>➤ number and capacity of waste management facilities producing fuels that can be used to power waste management and industrial processes?</li> </ul>	Section 7, Page 94

SA Objective	Appraisal Questions	Indicators	Issue Ref
<p><b>Objective 6: Climate Change Adaptation</b> To ensure that all waste management facilities are fully adapted to the impacts of climate change</p>	<p>➤ <i>Will the policy or proposal help to ensure that new or upgraded waste management facilities incorporate green infrastructure and maximise its benefits for flood risk management, urban cooling, resilience to drought, biodiversity and other climate adaptation objectives?</i></p>	<p>➤ number and proportion of new or upgraded waste management facilities achieving the Mayor's minimum Urban Greening Factor (UGF)<sup>70</sup> score of 0.3 according to Policy G5 and Table 8.2 of the draft new London Plan.</p> <p>➤ proportion of new or upgraded waste management facilities incorporating a green roof and achieving at least a 10% increase in green coverage compared to baseline conditions prior to development.</p> <p>➤ number and proportion of new or upgraded waste management facilities complying with the Mayor's sustainable design and construction SPG as amended.</p>	<p>Section 7, Page 95</p>
<p><b>Objective 7: Flood risk and sustainable drainage (SuDS)</b> To avoid, reduce and manage flood risk to or from waste management facilities</p>	<p>➤ <i>Will the policy or proposal help to avoid inappropriate development in flood risk areas?</i></p> <p>➤ <i>Will the policy or proposal ensure that the design and layout of the waste management sites preserves the ecological functioning of river corridors, enhance local amenity and avoid any net loss of floodplain storage?</i></p> <p>➤ <i>Will the policy or proposal minimise surface water run-off from new waste management facilities by incorporating sustainable urban drainage systems (SUDS), managing run-off as close to its source as possible and aiming to achieve greenfield run-off rates?</i></p>	<p>➤ number and proportion of new or upgraded waste management facilities located within Environment Agency (EA) flood zones 2, 3a and 3b.</p> <p>➤ number and proportion of new or upgraded waste management facilities located within areas at higher risk of surface water flooding according to the EA's 'Risk of Flooding from Surface Water (RoFSW)' map.</p> <p>➤ number and proportion of new or upgraded waste management facilities incorporating SuDS measures.</p> <p>➤ number and proportion of new or upgraded waste management facilities achieving greenfield run-off rates<sup>71</sup></p> <p>➤ number and proportion of new or upgraded waste management facilities incorporating flood resistance or resilience measures in line with Government guidance and EA Standing Advice.</p>	<p>Section 7, Page 95</p>

<sup>70</sup> alternatively the London Borough of Sutton's green space factor (GSF) in Local Plan Policy 33 can be used i.e. 'the number and proportion of new or upgraded waste management facilities achieving an increased green space factor (GSF) score of 0.2

<sup>71</sup> for all flood events up to and including the 1 in 100 year event (including 35% for climate change)



SA Objective	Appraisal Questions	Indicators	Issue Ref
<b>Objective 8: Sustainable Design and Construction</b> To promote the highest standards of sustainable design and construction in new waste management facilities	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to promote the highest standards of sustainable design and construction in new waste management facilities?</i></li> <li>➤ <i>Will the policy or proposal help to minimise environmental life cycle impacts by requiring developers to conduct Life Cycle Assessments as part of the design process</i></li> <li>➤ <i>Will the policy or proposal promote the use of responsibly sourced construction materials<sup>72</sup> with lower environmental impact?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ number and proportion of new or upgraded waste facilities achieving BREEAM 'Excellent'<sup>73</sup></li> <li>➤ number and proportion of waste facilities achieving an 'Excellent' rating under the BRE's 'CEQUAAL' scheme.</li> <li>➤ number and proportion of new or upgraded waste management facilities subjected to Life Cycle Assessment as part of the design process?</li> <li>➤ number and proportion of new or upgraded waste facilities promoting the use of responsibly sourced construction materials with lower environmental impact</li> </ul>	Section 7, Page 96
<b>(C) ENVIRONMENTAL QUALITY</b>			
<b>Objective 9: Transport</b> To reduce trips, traffic congestion and pollution arising from waste-related transport movements	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to minimise trips, traffic congestion and pollution arising from waste-related transport movements?</i></li> <li>➤ <i>Will the policy or proposal minimise the adverse impacts of waste-related transport movements on local roads by safeguarding and locating new waste management facilities close to the strategic road network?</i></li> <li>➤ <i>number of new or upgraded waste management facilities located in close proximity to sensitive receptors (i.e. within 400m).</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ <i>traffic flows on the strategic road network and local roads by vehicle type based on Department for Transport (DfT) and Transport for London (TfL) data (vehicle-km per annum)</i></li> <li>➤ <i>number of new or upgraded waste management facilities located in close proximity to the strategic road network (i.e. within 400m)</i></li> <li>➤ <i>number of new or upgraded waste management facilities located in close proximity to sensitive receptors (i.e. within 400m)</i></li> <li>➤ <i>number of waste sites intensified thus avoiding the need for new sites to developed and associated trips</i></li> <li>➤ <i>number and capacity of complementary uses introduced on waste sites, such as manufacturing from waste, with potential to enable 'linked trips'</i></li> </ul>	Section 7, Page 96

<sup>72</sup> for example through requiring submission of Environmental Product Declarations (EPD)

<sup>73</sup> the appropriate scheme is currently the BREEAM New Construction 2018

SA Objective	Appraisal Questions	Indicators	Issue Ref
<p><b>Objective 10: Air Quality</b> To minimise air pollution and impacts on sensitive land-uses arising from waste facilities</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal contribute towards meeting national air quality objectives for nitrogen dioxide (NO<sub>2</sub>), particulates (PM<sub>10</sub>) and ozone and avoid any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'?</i></li> <li>➤ <i>Will the policy or proposal help to promote measures such as green infrastructure and screening, in order to prevent or minimise increased exposure to air pollution?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ NO<sub>2</sub> (nitrogen dioxide) levels in µg/m<sup>3</sup> (Target: 200 µg/m<sup>3</sup> as a 1-hour mean no more than 18 days per year)</li> <li>➤ PM<sub>10</sub><sup>74</sup> levels in µg/m<sup>3</sup> (Target: 50 µg/m<sup>3</sup> as a 24-hr mean no more than 35 days/year; not to exceed 40 µg/m<sup>3</sup> as annual mean)</li> <li>➤ ozone levels in µg/m<sup>3</sup> as an 8-hour mean (Target: No more than 100 µg/m<sup>3</sup> as an 8 hour mean &gt; 10 x a year)</li> <li>➤ number and proportion of new or upgraded waste management developments located within AQMAs or within Air Quality Focus Areas</li> <li>➤ the number and proportion of new or upgraded waste management facilities achieving 'Air Quality Neutral' standards as defined by the Mayor<sup>75</sup></li> </ul>	Section 7, Page 97
<p><b>Objective 11: Environmental protection</b> To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities on noise pollution, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?</i></li> <li>➤ <i>Will the policy or proposal help to minimise water pollution from surface water runoff?</i></li> <li>➤ <i>Will the policy or proposal help to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ the number and proportion of new or upgraded waste management facilities located adjacent to residential uses and other sensitive land-uses</li> <li>➤ the number and proportion of new or upgraded waste management facilities which are enclosed or screened</li> <li>➤ new or upgraded waste facilities accompanied by Construction Environmental Management Plans</li> <li>➤ the number of new or upgraded waste management facilities incorporating the principles of 'water sensitive urban design' as part of the site drainage/SuDS strategy</li> <li>➤ the number and area of contaminated industrial sites remediated as a consequence of the development of new or upgraded waste management facilities (ha)</li> </ul>	Section 7, Page 98

<sup>74</sup> PM<sub>10</sub>s = particulate matter less than 10 microns in size

<sup>75</sup> 'air quality neutral' standards are defined in the Mayor's supplementary planning guidance (SPG) on Sustainable design and Construction (GLA, 2014)

SA Objective	Appraisal Questions	Indicators	Issue Ref
<p><b>Objective 12: Biodiversity and Habitats</b> To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive</p>	<ul style="list-style-type: none"> <li>➤ <i>Is the policy or proposal likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the EU Habitats Directive and the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?</i></li> <li>➤ <i>Will the policy or proposal help to minimise any potential impacts upon regionally or locally designated wildlife sites within the plan area?</i></li> <li>➤ <i>Will the policy or proposal ensure that there is no net loss in biodiversity value and incorporate opportunities to enhance biodiversity wherever possible as part of the development of new or upgraded waste management facilities?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ modelled increase in air pollution arising from the operation of new and existing waste management facilities in south London, associated transport movements and potential adverse impacts on sensitive habitats or species on relevant European sites<sup>76</sup>: <ul style="list-style-type: none"> <li>- Richmond Park SAC;</li> <li>- Wimbledon Common SAC;</li> <li>- Mole Gap to Reigate Escarpment SAC; and</li> <li>- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).</li> </ul> </li> <li>➤ the number of new or upgraded waste management facilities located within or adjacent to regionally or locally designated wildlife sites, including Sites of Interest for Nature Conservation (SINCs), local nature reserves (LNRs); and green corridors</li> <li>➤ change in biodiversity value arising from the development of new or upgraded waste management facilities based on an appropriate metric such as the DEFRA biodiversity offsetting metric<sup>77</sup></li> <li>➤ change in priority habitats and population of Biodiversity Action Plan (BAP) species within each of the four boroughs</li> </ul>	<p>Section 7, Page 98</p>

<sup>76</sup> the potential significance of any likely adverse effects on European sites arising from the new South London Waste Plan (SLWP) will be considered in the Habitats Regulations Assessment (HRA) Screening Report which will be produced for public consultation at the issues and options stage in October 2019

<sup>77</sup> further details of DEFRA's biodiversity offsetting metric is available on the GOV.UK website at <https://www.gov.uk/government/collections/biodiversity-offsetting>

SA Objective	Appraisal Questions	Indicators	Issue Ref
<b>(D) ENVIRONMENTAL QUALITY</b>			
<p><b>Objective 13: Local Economy and Employment</b> To promote local employment opportunities, and the competitiveness of the waste management sector within South London</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal promote investment, local employment opportunities and the competitiveness of the waste management sector?</i></li> <li>➤ <i>Will the policy or proposal contribute to the growth of the circular economy within south London?</i></li> <li>➤ <i>Will the policy or proposal help to ensure that employment land supply matches projected demand over the plan period in each of the four partner boroughs and for the plan area as a whole?</i></li> <li>➤ <i>Will the policy or proposal help to maintain a sufficient supply of land and premises to meet current and future demands for industrial uses within the four south London boroughs and across the wider Wandle Valley Property Market Area <sup>78</sup></i></li> <li>➤ <i>Will the policy or proposal help to that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ number of people employed in the Circular Economy within south London and by borough</li> <li>➤ number of green businesses by size and proportion surviving 1 year</li> <li>➤ growth in the low carbon and environmental goods and services sector within south London</li> <li>➤ projected supply and demand for employment land (for non waste-related uses) by borough over the plan period<sup>79</sup></li> <li>➤ vacancy rates within SILs and established industrial areas</li> <li>➤ number of sites and total area of employment land within SILs and established industrial areas intensified for waste management and/or for other industrial uses</li> <li>➤ area of employment land optimised for waste management and complementary manufacturing from waste uses</li> <li>➤ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%)</li> <li>➤ number and capacity of manufacturing from waste facilities developed within south London (tpa)</li> </ul>	Section 7, Page 99
<p><b>Objective 14: Historic Environment, Townscape and Visual Amenity</b> To avoid the adverse impacts of waste facilities on townscape quality and visual amenity by promoting high standards of design and layout</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal avoid all potential adverse impacts on the quality and distinctiveness of south London's historic environment and cultural assets,</i></li> <li>➤ <i>Will the policy or proposal ensure that new or upgraded waste management facilities are built to high quality design principles that respect local character and do not adversely affect townscape?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ the number and proportion of new or upgraded waste management facilities constructed to high quality design principles</li> <li>➤ adverse impacts on the setting of scheduled monuments, historic parks and gardens and other heritage or cultural assets in south London</li> </ul>	Section 7, Page 99

SA Objective	Appraisal Questions	Indicators	Issue Ref
<p><b>Objective 15: Human Health and Quality of Life</b> To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal protect and enhance local amenity for residents living near new and existing waste management facilities, particularly within areas affected by social deprivation?</i></li> <li>➤ <i>Will the policy or proposal help to minimise the impacts of waste facilities and associated transport movements?</i></li> <li>➤ <i>Will the policy or proposal help to reduce the incidence of waste-related crime and contribute to public perceptions of safety?</i></li> <li>➤ <i>Will the policy or proposal maintain the current level of protection for Green Belt and Metropolitan Open Land (MOL) and public open space</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ levels of social deprivation in residential areas adjacent to waste management sites and the strategic road network within south London as measures by the Government's Index of Multiple Deprivation (IMD) and the relevant domains relating to employment, health, crime and living environment</li> <li>➤ monitored levels of nitrogen dioxide (NO<sub>2</sub>), particulates (PM10) and ozone against national air quality objectives</li> <li>➤ levels of 'health and disability' deprivation in residential areas adjacent to waste management sites (see above)</li> <li>➤ environmental crime rate per 1,000 population</li> <li>➤ area of Green Belt, MOL and public open space and area lost to waste management development</li> </ul>	Section 7, Page 100
<p><b>Objective 16: Equalities, Accessibility and Social Inclusion</b> To reduce exclusion, address inequalities &amp; accessibility for all equalities target groups</p>	<ul style="list-style-type: none"> <li>➤ <i>Will the policy or proposal ensure that new waste management facilities are accessible and inclusive for all equalities target groups?</i></li> <li>➤ <i>Will the policy or proposal further promote social inclusion by addressing potential inequalities arising from current waste management arrangements in south London?</i></li> <li>➤ <i>Will the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?</i></li> <li>➤ <i>Will the policy or proposal maximize potential benefits to local communities in the form of new products and employment by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?</i></li> </ul>	<ul style="list-style-type: none"> <li>➤ new or upgraded waste management facilities within south London are accessible and inclusive for all equalities target groups</li> <li>➤ number and location of reuse and recycling centres within south London accepting household waste</li> <li>➤ proportion of the urban area within south London within 2 km of reuse and recycling centres</li> <li>➤ location and concentration of existing and new waste facilities relative to areas of relative social deprivation</li> <li>➤ number of individuals, residents' groups, special interest groups, business organisations, public bodies and neighbouring waste planning authorities consulted as part of the preparation of the new plan</li> </ul>	Section 7, Page 101

<sup>78</sup> the Wandle Valley Property Market Area includes Wandsworth as well as Croydon, Kingston,, Merton and Sutton

<sup>79</sup> based on the London Industrial Land Demand Study, prepared by CAG Consultants on behalf of the Mayor in 2017'





## 9. Identifying and Appraising Waste Sites

### Review of existing waste management capacity<sup>80</sup>

**9.1** As part of the evidence base for the new South London Waste Plan (SLWP), Anthesis consultants undertook an assessment of existing waste sites across the four boroughs in order to review what available waste management capacity may be considered to contribute towards the updated London Plan apportionment targets. Using the relevant apportionment criteria set out in the London Plan, the capacity review included the following types of waste management facility:

- **Used in London for energy recovery:** Energy recovery facility, energy from waste facility, anaerobic digestion;
- **Materials sorted or bulked in London facilities for reuse, reprocessing or recycling:** Materials Recycling Facility (MRF) or other materials sorting facility, transfer stations;
- **Material reused, recycled or reprocessed in London:** Material reprocessor, reuse facility, composting facility (permitted and exempt), anaerobic digestion facility; and
- **Produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition<sup>81</sup> as a minimum:** RDF or SRF production facilities (if Renewable Obligation Order requirements are met).

**9.2** Existing waste transfer stations where collected wastes are bulked before transporting to other facilities, such as landfilling, energy recovery or separation for recycling were not counted towards the apportionment unless prior separation takes place.

**9.3** Details of the review are set out in the South London Waste Technical Paper (Anthesis, 2019) in terms of:

- existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment;
- potential capacity gaps to 2036;
- waste management facilities in the planning pipeline;
- vacant sites which could be redeveloped for waste management uses; and
- opportunities for intensification.

**9.4** The main conclusion reached by the consultants was that the waste sites identified as suitable for intensification and development represent sufficient opportunity to meet the capacity gaps for household, C&I and C&D waste streams. If all potential new capacity identified were to be brought forward, there would be surplus capacity for the management of household, C&I and C&D waste streams throughout the plan period to 2036. Although this surplus is forecast to decrease over the plan period, there is considered to be some flexibility in bringing the identified capacity forward. As sufficient opportunities can be identified to meet the capacity gap for household, C&I (apportioned waste) and C&D waste streams, it was therefore not considered necessary for the updated SLWP to identify any new areas for new waste facilities within the four boroughs.

<sup>80</sup> see also Section 3 of this SA Report

<sup>81</sup> refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns. The written contract must include the end-user's technical specifications.

## Identifying sites for appraisal

### 9.5 Paragraph 4 of the NPPW states that:

*"Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages."*

### 9.6 In addition, 2020 London Plan Policy SI 8 states that:

*"Development Plan should identify the following as suitable locations to manage borough waste apportionments:*

- (a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity;*
- (b) Strategic Industrial Locations and Locally Significant Industrial Sites;*
- (c) safeguarded wharves with an existing or future potential for waste and secondary material management."*

9.7 The sites included in the appraisal therefore consist of all of the existing waste treatment sites within the four Boroughs together with all of the Strategic Industrial Locations (SILs) and locally significant industrial locations (LSILs) across the plan area. It also includes Site C4: Days Aggregates site, which utilises the Purley railhead. The Chessington railhead has not been included as the operators have informed officers that the site will not be used for waste management purposes and so would fail the availability strand of the developability test (see below).

## Initial site profiling (undertaken by Anthesis consultants)

9.8 As part of the evidence base, the consultants prepared initial site profiles for all existing waste management sites including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility, planning constraints and opportunities for intensification or upgrading existing operations. The results of initial site profiling undertaken by the consultants in early 2019 are set out Appendix 4 of the Technical Paper.

9.9 The following site assessment criteria and planning constraints can be directly related to one or more of the sustainability objectives making up the finalised SA Framework in Section 8: type of facility, throughput and licensed capacity:

- management type;
- access, congestion and road capacity;
- opportunity to use rail;
- cumulative impact of existing and proposed waste disposal facilities on community well-being;
- opportunity to intensify or upgrade;
- other designations;
- air quality focus area;
- green belt / MOL;
- flood risk;
- heritage assets; and
- proximity to environment designations

## Site appraisal methodology

9.10 Following the preparation of the Technical Paper by Anthesis consultants, the four partner Boroughs carried out further detailed site appraisal work for all potential sites within the plan area in order to identify a range of suitable, developable waste sites for inclusion in the new SLWP. The methodology used was closely based on policy and guidance set out in the National Planning Policy Framework (NPPF), the National Planning Policy for Waste (NPPW) and the 2020 London Plan.

**9.11** The NPPF's approach to site appraisal is based on the following three elements which determine whether a site is considered to be 'developable':

- (i) suitability – the site is appropriate in terms of planning policy and associated designations;
- (ii) availability – the site has no land ownership constraints;
- (iii) viability – the site could be considered financial viable to develop.

#### Suitability

**9.12** The suitability criteria used for the purpose of appraising potential waste sites are set out below in Table 9.1 together with the scoring system. These are derived from the criteria set out in Appendix B of the NPPW but incorporating amendments to reflect the context of the plan area.

**9.13** Some of the potential waste sites are quite large and so are surrounded by a lot of different use and this creates a bias against large sites where proximity criteria are involved. Consequently, large sites are only marked down for proximity or being adjacent to sensitive receptors where the land use has a significant boundary with the site

**9.14** The maximum suitability score for any particular site is 50.

**Table 9.1 Site Suitability Criteria and Scoring**

Suitability Criterion Used	Scoring System	Relevant NPPF Definition
<b>Water quality (SPZ)</b>	5 - Not in SPZ <sup>82</sup> or in SPZ3 3 - In SPZ2 1 - In SPZ1	(1) water quality
<b>Flood risk management (Flood)</b>	5 - Flood Zone 1 3 - Flood Zone 2 1- Flood Zone 3	(aii) flood risk management
<b>Metropolitan Open Land and Green Belt (MOL/GB)</b>	5 - Not adjacent to MOL/Green Belt 3 - Adjacent to MOL/Green Belt 1 - In MOL/Green Belt	(c) visual impacts
<b>Site of Interest for Nature Conservation (SINC)</b>	5 - Not adjacent to a SINC 3 - Adjacent to a SINC 1 - Within a SINC	(d) nature conservation
<b>Conservation Area or Scheduled Ancient Monument (CA/SAM)</b>	5 - Not adjacent to a CA or SAM 3 - Adjacent to a CA or SAM 1 - Within a CA	(e) historic environment
<b>Strategic Road Network (SRN)</b>	5 - Direct access to Strategic Road Network 3 - Access to Strategic Road Network without going through residential areas 1 - Access to Strategic Road Network going through residential areas	(f) traffic and access
<b>Sustainable Transport (Sus Trans)</b>	5 - Access to a sustainable transport network 1 - No access to sustainable transport network	(fii) traffic and access
<b>Sensitive Receptors (Sens Rec)</b>	15 - Not adjacent to sensitive receptors (residential, schools, hospitals) 7 - Adjacent to sensitive receptors (residential, schools, hospitals)	(g) air emissions (h) odours (i) vermin and birds; (j) noise, light & vibration; (k) litter (l) land use conflict
<b>SUITABILITY SCORE MAXIMUM</b>	<b>50</b>	

<sup>82</sup> Source Protection Zone

Availability and Viability

**9.15** The scoring system used for appraising site availability and viability is set out below in Table 9.2. The maximum respective scores for each of these criteria is 25, making 50 in total.

**9.16** An existing operational waste site scores highly because its very existence is considered to provide availability and viability. Large industrial areas which already include existing waste facilities score more highly than those which do not include existing waste facilities. The rationale for this is to reflect the fact that industrial land values vary across the plan area and those estates which are lower in value tend to have waste facilities which are more marginal in terms of profitability. This is considered to be a more reliable indicator of viability and availability than a notional viability assessments.

**Table 9.2 Site Availability and Viability Criteria**

Suitability Criterion Used	Scoring System
<b>Availability</b>	25 - Existing site 15 - Existing sites within or nearby 5 - No existing sites within or nearby
<b>AVAILABILITY SCORE MAXIMUM</b>	25
<b>Viability</b>	25 - Existing site 15 - Existing sites within or nearby 5 - No existing site within or nearby
<b>VIABILITY SCORE MAXIMUM</b>	25
<b>Total combined score</b>	<b>50</b>

Overall site appraisal score

**9.17** For each site appraised, a total score out of 100 was obtained by adding the sub-totals for site suitability (50), availability (25) and viability (25).

## Results of site appraisal

**9.18** The results of appraisal for all potential waste sites considered throughout the plan review process are set out in Table 9.3 below. Existing waste management sites within south London which are proposed to be carried forward and safeguarded in the draft SLWP (Submission Version) are shaded in green.

**9.19** The results indicate that these sites are the most developable sites across the plan area since they score highly not only in terms of not only availability and viability, but also in terms of suitability. Furthermore, they score highly even though the site appraisal gives less weight to availability and viability and that the site appraisal does not take into account any mitigation measures for suitability that may have imposed by way of conditions when the existing sites were granted planning permission.



Table 9.3 Results of Site Appraisal

SITE	Type	Area (ha)	SPZ	Flood	MOL/GB	SINC	CA/SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Availability	Viability	TOTAL SCORE	Notes
<b>CROYDON SITES</b>															
C1:Able Waste Services	Existing	0.45	1	5	3	3	5	3	1	15	36	25	25	86	Proposed
C4:Days Aggregates	Existing	2.0	1	5	5	5	5	3	5	7	36	25	25	86	Proposed
C5A:Factory Lane Trans Station	Existing	1.4	5	3	5	5	5	3	1	15	42	25	25	92	Proposed
C5B:Factory Lane R&R Centre	Existing	0.3	5	3	5	5	5	3	1	15	42	25	25	92	Proposed
C6:Fishers Farm R&R Centre	Existing	0.2	3	5	3	3	5	1	1	7	28	25	25	78	Proposed
C7:Henry Woods Waste Mgmt	Existing	0.7	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
C8:New Era Metals	Existing	0.4	1	5	5	5	5	5	1	15	42	25	25	92	Proposed
C9:Pear Tree Farm	Existing	1.8	1	5	1	3	5	1	1	15	32	25	25	82	Proposed
C10:Purley Oaks R&R Centre	Existing	0.2	1	1	5	5	5	5	1	7	30	25	25	80	Proposed
C11:SafetyKleen	Existing	0.3	1	5	5	3	5	5	1	15	40	25	25	90	Proposed
C12:Stubbs Mead Depot	Existing	2.7	5	3	5	3	5	5	1	15	42	25	25	92	Proposed
C13: Solo Wood Recycling	Existing	0.1	5	3	5	5	5	3	1	15	42	25	25	92	Proposed <sup>83</sup>
C2:Croydon Car Spares	Existing	0.05	5	5	3	3	5	1	1	7	30	5	5	40	Site deleted following I&POs
C3:Curley Skip Hire	Existing	0.05	5	5	5	5	5	1	1	7	34	5	5	44	Site deleted following I&POs
Marlpit Lane	SIL	20	1	5	5	1	5	5	5	15	42	15	15	72	Site excluded
Purley Way North (3 parts)	SIL	71.4	5	3	5	5	5	5	1	15	44	5	5	54	Site excluded
Purley Way South (2 parts)	SIL	33.3	1	5	3	3	5	5	1	15	38	15	15	68	Site excluded
Gloucester Road East	LSIL	2.6	5	5	5	3	5	1	5	15	44	5	5	54	Site excluded
Gloucester Road West	LSIL	1.5	5	5	5	5	5	1	5	7	38	5	5	48	Site excluded
Selsdon Road (two parts)	LSIL	6.7	5	5	5	3	5	1	5	7	36	5	5	46	Site excluded
Thornton Road	LSIL	4.7	5	5	5	5	5	5	1	7	38	5	5	48	Site excluded
Union Road	LSIL	3.3	5	5	5	5	5	5	1	7	38	5	5	48	Site excluded
Vulcan Way	LSIL	9.1	3	5	3	3	5	1	1	7	28	5	5	38	Site excluded

<sup>83</sup> site introduced following the issues and preferred options stage

SITE	Type	Area (ha)	SPZ	Flood	MOL/GB	SINC	CA/SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Avail-ability	Viab-ility	TOTAL SCORE	Notes
<b>KINGSTON SITES</b>															
<b>K2: Genuine Solutions</b>	Existing	0.3	5	5	5	5	5	5	1	15	46	25	25	96	Proposed
<b>K3: Kingston R&amp;R Centre</b>	Existing	0.4	5	5	3	3	5	1	1	15	38	25	25	88	Proposed
<b>K4: Kingston Waste Transfer Station</b>	Existing	1.6	5	5	3	3	5	1	1	15	38	25	25	88	Proposed
<b>K1: Chessington Equestrian Centre</b>	Existing	9.9	5	5	1	5	5	5	1	15	42	5	5	52	Site deleted <sup>84</sup> following I&POs
<b>Barwell Business Park</b>	SIL	-	5	5	3	5	5	5	5	15	48	5	5	58	Site excluded
<b>Chessington Industrial Estate</b>	SIL	-	5	5	3	3	5	3	5	7	36	15	15	66	Site excluded
<b>Cambridge Road/Hampden Road</b>	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
<b>Canbury Park</b>	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
<b>Fairfield Trade Pk/ Kingsmill Bus Pk</b>	LSIL	-	5	3	5	3	5	1	1	7	30	15	15	60	Site excluded
<b>London Road</b>	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
<b>Red Lion Industrial Estate</b>	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
<b>St George's Industrial Estate</b>	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
<b>St John's Industrial Estate</b>	LSIL	-	5	5	5	5	5	1	5	7	38	5	5	48	Site excluded
<b>Silverglade Business Park</b>	LSIL	-	5	5	1	5	5	5	1	7	34	5	5	44	Site excluded
<b>MERTON SITES</b>															
<b>M1: B&amp;T@Work</b>	Existing	0.06	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
<b>M2: European Metal Recycling</b>	Existing	1.0	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
<b>M3: Deadman Confidential</b>	Existing	0.4	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
<b>M4: Garth Road R&amp;R Centre</b>	Existing	0.7	3	5	5	5	5	1	5	7	36	25	25	86	Proposed
<b>M5: Garth Road Transfer Stat</b>	Existing	0.45	3	5	5	5	5	1	5	7	36	25	25	86	Proposed
<b>M6: George Killoughery Ltd</b>	Existing	0.8	1	3	3	3	3	3	1	15	32	25	25	82	Proposed
<b>M7: LMD (Abbey Ind Est)</b>	Existing	0.06	5	5	5	5	5	3	1	15	44	25	25	94	Proposed

<sup>84</sup> this site has has been deleted following the issues and preferred options stage since it is in temporary use

SITE	Type	Area (ha)	SPZ	Flood	MOL/GB	SINC	CA/SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Availability	Viability	TOTAL SCORE	Notes
M8: LMD Waste (Willow Lane)	Existing	0.07	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
M9: Maguire Skips	Existing	0.2	5	5	5	3	5	3	1	7	34	25	25	84	Proposed
M10: Powerday	Existing	0.3	5	3	3	3	5	3	5	15	42	25	25	92	Proposed
M11: Morden Transfer Station	Existing	0.8	3	5	3	5	5	1	5	7	34	25	25	84	Proposed
M12: NJB Recycling	Existing	0.3	5	5	3	3	5	3	5	7	36	25	25	86	Proposed
M13: One Waste Clearance	Existing	0.1	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
M14: Reston Waste	Existing	0.43	5	5	3	3	5	3	5	7	36	25	25	86	Proposed
M15: Riverside AD Facility	Existing	0.5	1	3	3	3	3	3	1	15	32	25	25	82	Proposed
M16: Riverside Bio-Treatment	Existing	0.4	1	3	3	3	3	3	1	15	32	25	25	82	Proposed
M17: UK & European (Ranns)	Existing	0.5	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
M18: Wandle Waste Man	Existing	0.07	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
Durnsford Road B	SIL	18.5	5	5	3	3	5	5	5	7	38	15	15	68	Site excluded
Hallowfield Way	SIL	7.9	5	5	5	3	3	5	5	7	38	5	5	48	Site excluded
Plough Road	SIL	13.8	5	1	3	3	1	3	5	7	28	15	15	58	Site excluded
Prince George's Road	SIL	6.2	1	3	5	3	5	5	5	7	34	5	5	44	Site excluded
Sth Wimbledon Bus Pk (Morden Rd)	SIL	31.7	3	5	3	3	3	5	5	7	34	5	5	44	Site excluded
Willow Lane	SIL	41.3	1	3	3	3	3	1	5	7	28	15	15	58	Site excluded
Bushey Road	LSIL	3.7	5	5	5	5	5	5	5	7	42	5	5	52	Site excluded
Burlington Way (Beverley Way)	LSIL	7.3	5	3	3	3	5	5	5	7	36	5	5	46	Site excluded
Malden Way (Beverley Way)	LSIL	0.7	5	3	5	3	5	1	5	7	34	5	5	44	Site excluded
Dundonald Road	LSIL	3.7	5	5	5	3	5	1	5	7	36	5	5	46	Site excluded
Durnsford Road A	LSIL	2.4	5	5	5	3	5	5	5	7	40	5	5	50	Site excluded
Gap Road	LSIL	3.8	5	5	5	3	5	3	5	7	38	5	5	48	Site excluded
Garth Road	LSIL	9.4	5	5	5	3	5	1	1	7	32	15	15	62	Site excluded
Nelson Trading Estate	LSIL	2.3	5	3	5	3	5	5	5	7	38	5	5	48	Site excluded
Rainbow Ind Estate (Raynes P)	LSIL	3.2	5	5	5	1	5	1	5	7	34	5	5	44	Site excluded
Streatham Road	LSIL	5.3	5	3	5	5	5	5	5	7	40	5	5	50	Site excluded

SITE	Type	Area (ha)	SPZ	Flood	MOL/GB	SINC	CA/SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Avail-ability	Viab-ility	TOTAL SCORE	Notes
<b>SUTTON SITES</b>															
S1: 777 Recycling Centre	Existing	1.0	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S2: Beddington Farmlands ERF	Existing	5.8	5	5	1	1	5	1	1	15	34	25	25	84	Proposed
S3: Cannon Hygiene	Existing	0.2	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S4: Croydon Transfer Station	Existing	0.7	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S5: Hinton Skips	Existing	0.6	5	3	5	5	5	1	1	15	40	25	25	90	Proposed
S6: Hydro Cleaning	Existing	0.2	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
S7: Kimpton R&R Centre	Existing	0.4	5	5	3	5	5	5	1	15	44	25	25	94	Proposed
S8: King Concrete	Existing	0.5	5	5	3	3	5	1	1	7	30	25	25	80	Proposed
S9: Premier Skip Hire	Existing	0.1	5	5	5	5	5	5	1	15	46	25	25	96	Proposed
S10: Raven Recycling	Existing	0.3	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S11: TGM Environmental	Existing	0.2	5	3	5	5	5	1	1	15	40	25	25	90	Proposed
S12: Beddington Lane Recovery	Existing	2.8	5	5	3	1	5	1	1	15	36	25	25	86	Proposed <sup>85</sup>
Beddington Industrial Estate	SIL	105.8	5	3	3	3	3	1	1	7	26	15	15	56	Site excluded
Imperial Way Industrial Estate	SIL	18.8	1	5	3	5	5	5	1	15	40	5	5	50	Site excluded
Kimpton Way Industrial Estate	SIL	5.9	5	5	3	3	5	5	1	7	34	15	15	64	Site excluded
Croydon Industrial Area	LSIL	0.9	5	5	5	5	5	5	1	7	38	5	5	48	Site excluded
Gander Green Lane/Abbotts Rd	LSIL	0.7	3	5	5	5	5	5	1	7	36	5	5	46	Site excluded
Hackbridge Industrial Area	LSIL	1.3	1	3	5	5	5	1	5	7	32	5	5	42	Site excluded
Oldfields Way Industrial Area	LSIL	0.6	5	3	5	3	5	1	1	7	30	5	5	40	Site excluded
Plumpton Way Industrial Area	LSIL	1.1	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
Restmor Way Industrial Area	LSIL	3.4	1	3	5	3	5	1	5	7	30	5	5	40	Site excluded
Wandle Valley Trading Estate	LSIL	0.3	1	1	5	3	5	3	1	7	26	5	5	36	Site excluded

<sup>85</sup> site introduced following the issues and preferred options stage

## Industrial areas previously identified as suitable for waste facilities but not proposed to be carried forward

9.20 Industrial areas previously identified as 'broad areas' suitable for waste management uses in Schedule 2 of the current SLWP (2012) are listed below in Table 9.4.

**Table 9.4: Industrial areas previously identified as suitable but not carried forward**

SLWP Ref	Industrial Area	Significant changes since 2012
<b>CROYDON/SUTTON</b>		
102	Purley Way, Lysander Road and Imperial Way Ind. Area	n/a
<b>CROYDON</b>		
99	Purley Oaks Highways Depot	This area has been allocated as a Gypsy and Traveller site. Therefore, it is no longer suitable for new waste facilities
105	Factory Lane Industrial Estate	3.33ha of land within this area has been designated for redevelopment (Proposal Sites 430 and 946). Therefore the area suitable for waste facilities will reduce in size
125	Factory Lane (South Side)	n/a
<b>KINGSTON</b>		
	Chessington Industrial Area	n/a
<b>MERTON</b>		
	Durnsford Road Industrial Area	This area has had office buildings converted to residential accommodation under Prior Approval (Vantage House, Weir Road). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of the south of the area for new waste uses. Durnsford Road was identified in the Crossrail 2 consultation in 2015 as the 'proposed site for stabling, depot, shaft and tunnelling works', however Crossrail 2 works are likely to begin beyond the plan period for the new SLWP
	Garth Road Industrial Area	This area has had office buildings converted to residential uses under Prior Approval (Enterprise House). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of parts of the Area for waste uses
	Willow Lane Industrial Area	This area has had office buildings converted to residential accommodation under Prior Approval (Connect House). The Area is now subject to an Article 4 direction which has removed the permitted development rights, however the residential accommodation already in the middle of the Area will affect the suitability of parts of the Area for waste uses. Willow Lane is a Business Improvement District and is currently subject to a BID vote
<b>SUTTON</b>		
	Beddington Ind Area (part)	n/a
	Kimpton Industrial Estate (part)	Land north of Minden Road has been redeveloped for other uses. Therefore, it is no longer suitable for new waste facilities
	Wandle Valley Trading Estate (part)	This area has been redeveloped for other uses and it is an integral part of the Wandle Valley Trail. Therefore, it is no longer suitable for new waste facilities



## Sustainability appraisal of potential waste sites

**9.21** In addition to the above site appraisal work, the potential impacts of each of the existing or potential waste management sites considered throughout the plan review process has been appraised, where relevant, against each of the sustainability objectives making up the finalised SA Framework out in Section 8 of this document. It should be noted that there is a significant overlap between (i) the consultants' initial site assessment criteria and the criteria developed by the four Boroughs for the purpose of assessing site suitability, availability and deliverability; and (ii) the sustainability objectives making up the SA Framework.

**9.22** The appraisal results for each of the sites are set out in Section 12.

**9.23** In interpreting the outcome of site appraisal it should be noted that:

- for existing waste management sites which are already in operation, it can be assumed that any potential adverse impacts upon the local environment and neighbouring land-uses (arising from both construction and operation) should have been mitigated already at least some extent as part of the planning permission;
- those existing waste management sites which have potential for intensification or redevelopment intrinsically offer additional opportunities for avoiding or minimising adverse effects on upon the local environment and neighbouring land-uses;
- a number of the sustainability criteria within the SA Framework (e.g. 'sustainable design and construction') cannot meaningfully be assessed in relation to specific sites, since the nature and extent of the potential impact will be determined by the effective implementation of the relevant development management policies rather than the location or any other intrinsic characteristic of the site. This is indicated in the matrix through a through a 'neutral' rating.

## 10. Developing Proposed South London Waste Plan Policies (Task A5)

### Developing draft policies for inclusion in the Issues and Preferred Options document (Regulation 18 consultation)

**10.1** Based on initial evidence gathering on existing and future waste management capacity in South London against the new London Plan apportionment, specific policy recommendations contained in the Technical Paper (Anthesis, June 2019) and the outcome of the sustainability appraisal (SA) scoping stage, the following draft policies (WP1-WP8) were developed by the partner boroughs as part of the preferred SLWP option to guide proposed waste developments over the plan period from 2021 to 2036:

- Draft Policy WP1: Strategic Approach to Municipal Solid Waste and C&I Waste;
- Draft Policy WP2: Strategic Approach to Other Forms of Waste;
- Draft Policy WP3: Existing Waste Sites;
- Draft Policy WP4: Sites for Compensatory Provision;
- Draft Policy WP5: Protecting and Enhancing Amenity;
- Draft Policy WP6: Sustainable Design and Construction of Waste Facilities;
- Draft Policy WP7: The Benefits of Waste;
- Draft Policy WP8: Planning Obligations.

**10.2** The above policies were subsequently put forward in the SLWP Issues and Preferred Options document which was published for public consultation between 31 October and 22 December 2019. The accompanying SA Report concluded that draft Policies WP1-WP8 -which represented the partner boroughs' 'preferred' strategy for the new SLWP (Option 1) – would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

### Developing proposed policies for inclusion in the draft SLWP for submission (Regulation 19 consultation)

**10.3** At the close of consultation period, a total of 1,155 representations<sup>86</sup> had been received from 78 individual consultees. Some of the key waste planning and sustainability issues arising from public consultation are discussed in Section 7 of this SA Report on 'Key Sustainability Issues'.

**10.4** A draft version of the SLWP 2021-36 (the draft plan) has now been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public. While the overall strategic approach to managing South London's future waste arisings to 2036 is essentially unchanged, the draft plan incorporates a number of changes to the waste policies put forward at the issues and preferred options stage in the light of representations received and changing circumstances.

<sup>86</sup> a complete list of representations to the SLWP Issues and Preferred document and to accompanying SA Report together with officer comments are available in the South London Waste Plan Examination Library

**10.5** The draft plan, which has been published for further public consultation between 4 September and 22 October (Regulation 19 consultation), now identifies the following 10 strategic and development management policies to guide waste treatment within the four boroughs over the next 15 years.

#### Strategic Policies

- **WP1 Strategic Approach to Household and Commercial and Industrial Waste:** The policy title has been changed to refer to 'household' waste in place of 'Municipal Solid Waste'; and
- **WP2 Strategic Approach to Other Forms of Waste:** This policy has been amended to reflect the move from a shortfall in C&D waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of Surrey County Council (see Representation C18/144) amongst other South East councils.

#### Development Management Policies

- **WP3 Existing Waste Sites** (unchanged);
- **WP4 Sites for Compensatory Provision** (unchanged);
- **WP5 Protecting and Enhancing Amenity** (unchanged);
- **WP6 Sustainable Design and Construction of Waste Facilities:** This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that, where appropriate, the sustainability credentials of a waste development can be measured against the BRE's 'CEEQUAL'<sup>87</sup> scheme in place of the BREAM New Construction scheme;
- **WP7 The Benefits of Waste** (unchanged);
- **WP8 New Development Affecting Waste Sites:** This is a new policy to reflect the requests from SUEZ (see Representation C20/10) and Veolia (see Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy:
- **WP9 Planning Obligations** (unchanged);
- **WP10 Monitoring and Contingencies:** This is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies

**10.6** The basis for introducing the above changes can be seen in the consultee comments and the relevant officer responses set out in the Schedule of Representations on the Issues and Preferred Options document.

## Strategic alternatives for the purpose of appraisal

**10.7** The strategic alternatives previously identified at the issues and options stage have been largely carried forward for the purpose of appraising the proposed policies included in the draft Plan.

- **Option 1: Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP submission version (see above);
- **Option 2: Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged; and
- **Option 3 "Do-Nothing" scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

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<sup>87</sup> the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at <https://www.ceequal.com/>

**10.8** Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and SWP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036:

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged.
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the current SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

**10.9** In considering the impacts of Option 1 (Proposed Plan), the potential sustainability benefits of the newly introduced policies (WP8 and WP10) and the significant changes made to Policies WP2 and WP6 have also been assessed in relation to the draft policies put forward at the issues and preferred options stage.

**10.10** While in many respects proposed Policies WP1-WP10 (Option 1) carry forward and build upon the policies in the existing plan, there are number of important differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation. As can be seen from the results of the appraisal, these are likely to have significant beneficial impacts by comparison with the existing plan.

**10.11** Further details of the proposed policies and strategic alternatives (Options 1-3) are set out below.

### **Policy WP1: Strategic approach to Household and C&I waste**

#### **OPTION 1: PROPOSED PLAN - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT)**

(a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.

(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.

(c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).

(d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).

#### **OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT)**

Carry forward Policy WP1 from existing SLWP 2012

#### **OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)**

#### **OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policy WP1 to expire in 2021

**Policy WP2: Strategic approach to other forms of waste****OPTION 1: PROPOSED PLAN - SAFEGUARD EXISTING SITES ONLY**

(a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.

(b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for Construction and Demolition waste of managing 420,275 tonnes per annum within their boundaries across the plan period to 2036. The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).

(c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5.

(d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.

(e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill STW and the Beddington STW will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.

**OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS**

Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.

**OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES**

Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.

**OPTION 3: 'DO-NOTHING' SCENARIO** Allow existing Policy WP2 to expire in 2021

**Policy WP3: Existing waste sites****OPTION 1: PROPOSED PLAN- POLICY WP3**Safeguarding

(a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.

Intensification

(b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.

Safeguarding Compensatory Provision

(c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.

(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.

Safeguarding Waste Hierarchy

(e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.



**OPTION 2: EXISTING PLAN**

Carry forward Policies WP3 & WP4 from existing SLWP 2012.

**OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policies WP3 and WP4 to expire in 2021.

**Policy WP4: Sites for compensatory provision****OPTION 1: PROPOSED PLAN - POLICY WP4**

Proposals for new waste sites to provide compensatory provision should:

- (a) Demonstrate that the site is capable of providing sufficient compensatory capacity.
- (b) Be located on sites:
  - (i) within Strategic Industrial Locations or Locally Significant Industrial Locations;
  - (ii) not having an adverse effect on nature conservation areas protected by international or national regulations;
  - (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and, (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.
- (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;
- (d) Have particular regard to sites which:
  - (i) do not result in visually detrimental development conspicuous from strategic open land (e.g. Green Belt or Metropolitan Open Land);
  - (ii) are located more than 100 metres from open space;
  - (iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
  - (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;
  - (v) have direct access to the strategic road network;
  - (vi) have no Public Rights of Way crossing the site;
  - (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views;
  - (viii) offer opportunities to accommodate various related facilities on a single site;
- (e) Include appropriate mitigation measures which will be considered in assessing site suitability.
- (f) Meet the other policies of the relevant borough's Development Plan.

**OPTION 2: EXISTING PLAN**

Carry forward Policy WP5 from existing SLWP 2012

**OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policy WP5 to expire in 2021

**Policy WP5: Protecting and enhancing amenity****OPTION 1: PROPOSED PLAN - POLICY WP5**

(a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.

(b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.

(c) Particular regard will be paid to the impact of the development in terms of:

- (i) The Green Belt, Metropolitan Open Land, recreation land or similar;
- (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
- (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
- (iv) Groundwater, surface water and watercourses;
- (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;
- (vi) Noise and vibration from the plant and traffic generated;
- (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;
- (viii) The safety and security of the site
- (ix) Odour, litter, vermin and birds; and,
- (x) The design of the waste facility, particularly:
  - complementing or improving the character of an area;
  - limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
  - being of a scale, massing or height appropriate to the townscape or landscape;
  - using good quality materials;
  - minimising the requirement for exterior lighting; and,
  - utilising high-quality boundary treatments.

The information in the schedule below will provide the basis for the assessment of the impact of a development.

**OPTION 2: EXISTING PLAN**

Carry forward Policy WP7 from SLWP 2012

**OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policy WP7 to expire in 2021

**Policy WP6: Sustainable design and construction of waste facilities****OPTION 1: PROPOSED PLAN - POLICY WP6**

(a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies of the relevant borough's Development Plan.

(b) Waste facilities will be required to:

- (i) minimise on-site carbon dioxide emissions in line with 2020 London Plan Policy SI2;
- (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;
- (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with 2020 London Plan Policy G5;
- (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;
- (v) minimise waste and promote sustainable management of construction waste on site; and,
- (vi) protect, manage and enhance local habitats and biodiversity.

**OPTION 2: EXISTING PLAN**

Carry forward Policy WP6 from SLWP 2012

**OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policy WP6 to expire in 2021

**Policy WP7: The benefits of waste****OPTION 1: PROPOSED PLAN - POLICY WP7**

(a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.

(b) Waste development for additional Energy from Waste facilities will not be supported

(c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.

**OPTION 2: EXISTING PLAN**

Carry forward Policy WP8 from SLWP 2012.

**OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policy WP8 to expire in 2021.

**Policy WP8: New Development affecting waste sites (NEW POLICY)****OPTION 1: PROPOSED PLAN - POLICY WP8**

(a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.

(b) Where new development is proposed that may be affected by an existing waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:

(i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision.

(ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations..

**OPTION 2: EXISTING PLAN**

Not applicable.

**OPTION 3: 'DO-NOTHING' SCENARIO**

Do not include NEW POLICY W8 in the draft SLWP for submission.

**Policy WP9: Planning obligations****OPTION 1: PREFERRED POLICY**

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.

**OPTION 2: EXISTING PLAN**

Carry forward Policy WP9 from SLWP 2012.

**OPTION 3: 'DO-NOTHING' SCENARIO**

Allow existing Policy WP9 to expire in 2021.

**Policy WP10: Monitoring and contingencies (NEW POLICY)****OPTION 1: PROPOSED PLAN - POLICY WP8**

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.

**OPTION 2: EXISTING PLAN**

Not applicable.

**OPTION 3: 'DO-NOTHING' SCENARIO**

Do not include NEW POLICY W10 in the draft SLWP for submission.

# 11. Compatibility of the Vision and Objectives against the SA Framework Objectives (Task B1)

## Background

11.1 Government guidance emphasises the importance of compatibility analysis as part of the appraisal process as a way of ensuring that emerging plan objectives are fully compatible and actively contribute towards each of the sustainability objectives in the SA Framework (Section 8). Compatibility analysis can also be used to highlight those areas of planning policy that might be in conflict with overarching sustainability objectives in the absence of appropriate mitigation measures.

## Proposed Vision

11.2 The draft South London Waste Plan (SLWP) for submission sets out the following proposed Vision.

### PROPOSED VISION

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met.

The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates..

## Proposed objectives

11.3 The above Vision is supported by the following proposed objectives.

### PROPOSED OBJECTIVES

- (1) Meet the 2020 London Plan target for Household and Commercial and Industrial Waste.
- (2) Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary.
- (3) Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan.
- (4) Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates.
- (5) Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.
- (6) Ensure the effects of new development are mitigated and, where possible, enhance amenity.

## Compatibility analysis

11.4 The Compatibility Matrix in Table 11.1 presents the outcome of testing the proposed Vision and the six objectives against the 16 SA Framework objectives.



**Table 11.1:**  
**Compatibility Matrix**

KEY √√ Compatible & Synergistic √ Compatible objectives X Incompatible ? Potential Conflict □ No interaction	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste-related HGV movement	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse effects on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>PROPOSED VISION</b>																
By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met. The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates	√√	√√	√	√	√	√	√	√√	√√	√√	√	√	√√	√	√√	√√
<b>PROPOSED OBJECTIVES</b>																
Meet the 2020 London Plan target for Household and Commercial and Industrial Waste.	√√	√√	√√	√					√	√	√		√		√	√
Meet the identified needs for C&D Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary	√√	√√	√√	√√	√√	√√	√√	√	√	√	√√	√	√	√	√	√
Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan	√√	√√	√	√	√				√√	√√	√	√	√√	√	√√	√√
Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates.		√√									√		√√	√	√	√√
Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.		√	√	√	√√	√√	√√	√√	√	√√	√√	√√	√	√√	√√	√√
Ensure the effects of new development are mitigated and, where possible, enhance amenity		√	√	√	√√	√√	√√	√√	√	√√	√√	√√	√	√√	√√	√√

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## 12. Appraisal of Proposed Policies and Sites (Tasks B3, B4 and B5)

### Appraisal Methodology

**12.1** The SA Matrix in Table 12.1 sets out the results of appraisal for each of the proposed waste policies (WP1-WP10) set out in the draft SLWP for submission (Part A) and for all of the sites proposed to be safeguarded for waste uses (C1-C12, K2-K4, M1-M18 and S1-S12) (Part B).

**12.2** As discussed in Section 10, three strategic alternatives have been identified for the management of South London's waste over the next 15 years from 2021 to 2036. **Option 1 Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP for submission. **Option 2 Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged. **Option 3 'Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

**12.3** New policies and significant changes to the proposed policies which have been introduced since the issues and preferred options stage in response to consultation comments or updated evidence are indicated through underlined text. However, Option 1 (Proposed Plan) essentially carries forward the preferred strategy which was subject to appraisal in the previous SA Report<sup>87</sup>.

**12.4** Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and WP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036. **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged. **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

**12.5** Part B of the SA matrix draws substantially upon the initial site profiling work undertaken by Anthesis consultants together with the subsequent detailed site appraisal work undertaken by the four boroughs to evaluate the suitability, availability and deliverability of each site (see Section 9).

**12.6** It should be noted that for existing waste sites which are already in operation and complying with both their planning permissions and waste management licenses, it has been assumed that any potential adverse impacts upon the local environment and neighbouring land-uses (from construction and operation) should have been mitigated already at least some extent as part of the permission.

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<sup>87</sup> the preferred SLWP policies put forward at the issues and preferred options stage and draft Policies WP1-WP10 have been treated as a single strategic option (i.e. Option 1) for the purpose of the appraisal. However any further sustainability benefits arising from the two new policies and additional wording have been reflected in the matrix scoring and associated commentary

12.7 The scoring system used to indicate the nature and magnitude of impacts is set out in Figure 12.1 below.

Figure 12.1: Scoring system for use in the appraisal

Symbol	Scale of effect
+++	Large beneficial impacts
++	Medium beneficial impacts
+	Smaller beneficial impact
-	Neutral or no impact
x	Smaller negative impact
xx	Large negative effect.
?	Uncertain impact or the nature and magnitude of the impact is subject to the implementation of other policies in the plan.

## SUSTAINABILITY APPRAISAL MATRIX

### Part A: Proposed Policies

	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standard of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>POLICY WP1: STRATEGIC APPROACH TO HOUSEHOLD WASTE AND COMMERCIAL AND INDUSTRIAL WASTE (unchanged)</b>																
<b>OPTION 1: PROPOSED POLICY WP1 - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT)</b> (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 9,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036. (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3). (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).	+++	+++	++	++	++	++	++	++	+++	+++	++	++	+++	++	++	++
<b>OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT)</b> Carry forward Policy WP1 from existing SLWP 2012	+++	+	+	+	+	X	X	X	X	X	X	X	+	X	X	X
<b>OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)</b>	+++?	+?	+?	+?	+?	X?	X?	X?	X?	X?	X?	X?	+	X?	X?	X?
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policy WP1 to expire in 2021	xx?	xx?	X	X	X	X?	X	X	xx?	xx?	xx?	xx?	X	xx?	xx?	xx?

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) <b>NET SELF-SUFFICIENCY</b> To provide sufficient sites and waste management facilities for all waste streams making up the apportionment	(2) <b>SPATIAL STRATEGY</b> To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) <b>RECYCLING &amp; RECOVERY</b> To drive waste management up the waste hierarchy.	(4) <b>CIRCULAR ECONOMY</b> To promote a transition to a circular economy within south London.	(5) <b>CLIMATE MITIGATION</b> To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) <b>CLIMATE ADAPTATION</b> To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) <b>FLOOD RISK &amp; SuDS</b> To avoid, reduce and manage flood risk to or from waste management facilities	(8) <b>SUST. DESIGN</b> To promote the highest standards of sustainable design and construction.	(9) <b>SUSTAINABLE TRANSPORT</b> To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) <b>AIR QUALITY</b> To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) <b>ENVIRONMENTAL PROTECTION</b> To minimise the adverse impacts during construction & operation of waste facilities	(12) <b>BIODIVERSITY AND HABITATS</b> To protect and enhance biodiversity & habitats	(13) <b>ECONOMY &amp; EMPLOYMENT</b> To promote employment, & competitiveness of the waste sector in Sth London	(14) <b>TOWNSCAPE AND VISUAL AMENITY</b> To minimise adverse impacts on townscape quality and visual amenity	(15) <b>HEALTH &amp; QUALITY OF LIFE</b> To minimise adverse on human health and protect the open environment	(16) <b>EQUALITIES, &amp; SOCIAL INCLUSION</b> To reduce exclusion, address inequalities & improve
<p><b>COMMENTARY</b> Proposed Policy WP1 'Strategic Approach to Household and Commercial and Industrial Waste' is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London by providing sufficient sites and waste management facilities to meet (but not exceed) the new London Plan apportionment over the plan period; eliminating the need to identify additional waste management sites by working with the waste management industry to develop more efficient, effective and cleaner management practices; and encouraging the intensification of suitable sites.</p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by optimising and intensifying the capacity of new and existing waste management sites; avoiding the uptake of additional employment land in South London for waste management operations; and minimising transport movements and other potentially adverse environmental impacts associated with waste management activities by seeking to promote complementary uses such as manufacturing from waste in line with 'circular economy principles.</p> <p>(9) Promoting <b>sustainable transport</b> objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by seeking to minimise traffic congestion and air pollution arising from HGV movements to and from existing or upgraded waste management facilities for example by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas such as secondary material processing facilities.</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'.</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and by working with the waste management industry to develop more efficient and effective management practices.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026 by working with the waste management industry to develop more efficient, effective and cleaner management practices; and by encouraging the intensification of suitable sites. Not safeguarding the Beddington Farmlands landfill site in LB Sutton following its scheduled closure in 2023 is also expected to boost waste recovery rates rather than disposal, thereby moving waste management practices further up the waste management hierarchy</p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste e.g. production of that can be used to power waste management and industrial processes.</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices. It should be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP.</p> <p>(6) Ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b> including summer heatwaves, contribution to the urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and appropriate sustainable drainage measures (SuDS) in all new or upgraded waste management facilities.</p> <p>(7) Promoting <b>sustainable drainage (SuDS) measures</b> in all new or upgraded waste management facilities in south London.</p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> in all new, upgraded or iNTENSIFIED waste management facilities by increasing the number and proportion of waste management facilities achieving an 'Excellent' rating under the BREEAM New Construction 2018 scheme; increasing the number and proportion of waste management facilities promoting the use of responsibly sourced construction materials with lower environmental impact; and implementing sustainable management practices in connection with design, construction, commissioning, handover and aftercare of new, upgraded or intensified waste management facilities.</p> <p>(11) Protecting the quality of <b>South London's environment</b>, particularly for vulnerable receptors by minimising the adverse impacts of noise, vibration, dust, light, soil contamination, odour and water pollution during both the construction and operational phases; ensuring that all new or upgraded waste management facilities are enclosed/ screened; and helping to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment.</p> <p>(12) Protecting <b>biodiversity and habitats</b> by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of new or upgraded sites (e.g. green or 'living' roof); and by ensuring that major waste-related developments achieve no net loss in biodiversity value.</p> <p>(14) Minimising the potentially adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London, primarily by eliminating the need for additional sites and also by promoting the more efficient use of industrial land.</p> <p>(15) Minimising the potentially adverse effects on <b>human health and the open environment</b>, particularly within areas affected by social deprivation, by eliminating the need for additional waste management sites in south London sites and ensuring that all new or upgraded waste management facilities are enclosed.</p> <p>(16) Promoting. <b>equalities, accessibility and social inclusion</b> by minimising the potentially adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues.</p> <p><u>CONCLUSIONS</u></p> <p>The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Proposed Policy WP1 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (exceeding the apportionment and therefore carrying forward existing Policy WP1 by safeguarding existing sites and all industrial areas) and Option 2B (aiming to exceed the apportionment by safeguarding existing sites and identifying new waste sites). The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative.</p>															



	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites and waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standard of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE (amended)</b>																
<b>OPTION 1: PROPOSED POLICY WP2 - SAFEGUARD EXISTING SITES ONLY</b> <i>(a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</i> <i>(b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&amp;D waste of managing 420,275 tpa [to] 2036. The boroughs of the SLWP will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (Policy WP3).</i> <i>(c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5.</i> <i>(d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.</i> <i>(e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill and the Beddington STW will be supported,</i>	+++	+++	++	++	++	+	+	+	+++	+++	+++	+	++	+	+	+
<b>OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS</b> Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.	+++	+	+	+	+	X	X	X	X	X	X	X	+	X	X	X
<b>OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES</b> Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.	+++?	+?	+?	+?	+?	X?	X?	X?	X?	X?	X?	X?	+	X?	X?	X?
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Existing Policy WP2 expires in 2021	xx?	xx?	X	X	X	X?	X	X	xx?	xx?	xx?	xx?	X	xx?	xx?	xx?

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>COMMENTARY</b> Proposed Policy WP2 'Strategic Approach to Other Forms of Waste' has been amended since the issues and preferred options stage to reflect the move from a shortfall in C&amp;D waste to a small surplus against forecast arisings in 2036. By comparison with the preferred policy put forward at the issues and options stage, Proposed Policy WP2 is now predicted to have greater beneficial impacts on (1) net self sufficiency (3) recycling and recovery (4) circular economy; and (13) economy &amp; employment</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London by safeguarding sufficient sites and encouraging the intensification of these sites as appropriate to meet the forecast arisings for C&amp;D waste of 420,275 tpa [to] 2036. There is also an additional commitment as part of this policy to work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by ensuring that any proposals providing for additional construction and demolition waste capacity (either transfer or management) within South London are delivered only through the intensification of existing sites unless this is for compensatory provision. This will promote the efficient use of employment land and avoid the need to identify additional sites for the management of other forms of waste.</p> <p>(9) Promoting <b>sustainable transport</b> objectives within South London by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&amp;D), radioactive, agricultural or hazardous waste streams.</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses, again by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&amp;D), radioactive, agricultural or hazardous waste streams'. This will be achieved by optimising the capacity of existing C&amp;D waste management facilities, for example through the intensification of existing sites and by providing incentives to operators to manage greater volumes of C&amp;D closer to their licensed capacities</p> <p>(11) Protecting <b>the quality of South London's environment</b> by opposing the development of new facilities for the management of radioactive, agricultural or hazardous waste streams; avoiding additional HGV movements and associated environmental impacts (see above); ensuring that additional C&amp;D waste capacity (either transfer or management) can only be delivered through the intensification and therefore improvement of existing sites; ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed; and implementing environmental enhancements at the Hogsmill and Beddington Sewage Treatment Works respectively.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London by encouraging the intensification of existing sites for the management of C&amp;D and other waste streams. This policy is now considered to have a medium beneficial impact based on the newly identified surplus in capacity for the management of C&amp;D waste in 2016 and the inclusion of a new commitment to work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London by promoting the efficient use of employment land for the management of C&amp;D and other waste stream (formerly appraised as a 'small beneficial impact).</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices. The proposed replacement of the combined heat and power (CHP) plant at the Hogsmill Sewage Treatment Works is expected to deliver a net reduction in CO<sub>2</sub> emissions. It should also be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP.</p> <p>(13) Promoting <b>local employment and South London's economy</b> by eliminating the need for additional waste sites and/or 'broad locations' within SILs and other established industrial areas, thus safeguarding available industrial land and floorspace for other employment uses.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(6) Ensuring that all upgraded/ intensified waste management facilities for the management of C&amp;D and other waste streams are <b>fully adapted to the future impacts of climate change</b> including summer heatwaves, contribution to the UHI effect, flooding and drought by promoting green infrastructure and appropriate SuDS in all upgraded/ intensified facilities for the management of C&amp;D and other waste streams.</p> <p>(7) Ensuring that all upgraded/ intensified waste management facilities for the management of C&amp;D and other waste streams incorporate appropriate <b>sustainable drainage (SuDS) measures</b>.</p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> in all upgraded/ intensified waste management facilities for the management of C&amp;D and other waste streams.</p> <p>(12) Protecting <b>biodiversity and habitats</b> by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of upgraded/ intensified waste management facilities for the management of C&amp;D and other waste streams; and through specific biodiversity enhancements planned for the Hogsmill STW (Kingston) and the ongoing restoration of the Beddington Farmlands landfill site (due for closure in 2023).</p> <p>(14) Minimising the adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London, primarily by eliminating the need for additional sites for the management of C&amp;D and other waste streams</p> <p>(15) Minimising the potentially adverse effects on human health and the open environment.</p> <p>(16) Promoting equalities objectives by avoiding the potentially adverse impacts which would otherwise be expected to arise from the designation of additional sites for the management of C&amp;D and other streams and associated HGV movements, including air pollution, dust and noise. This is of particular benefit for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues.</p> <p><u>CONCLUSIONS</u></p> <p>The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Proposed Policy WP2 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (allowing proposals for C&amp;D waste together with all 'other' waste streams including radioactive, agricultural or hazardous waste on both existing sites and all industrial areas and therefore carrying forward Policy WP2 of the existing SLWP) and Option 2B (allowing proposals for C&amp;D waste together with all 'other' waste streams on both existing sites and newly identified sites). The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative. This policy has been strengthened in terms of its potential to meet a number of key sustainability objectives by comparison with Preferred Policy WP1 put forward at the issues and preferred options stage.</p>															

	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standard of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>POLICY WP3: EXISTING WASTE SITES (unchanged)</b>																
<p><b>OPTION 1: PROPOSED POLICY WP3</b></p> <p><u>Safeguarding</u> (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.</p> <p><u>Intensification</u> (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant Borough's Development Plan.</p> <p><u>Safeguarding Compensatory Provision</u> (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.</p> <p>(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.</p> <p><u>Safeguarding Waste Hierarchy</u> (e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.</p>	+++	+++	+++?	++	++				+++	+++	++?	++	+++	++?	++?	++?
<p><b>OPTION 2: EXISTING PLAN</b></p> <p>Carry forward Policies WP3 &amp; WP4 from existing SLWP 2012.</p>	++	++	++	++	+				++	++	+	+	++	+	+	+
<p><b>OPTION 3: 'DO-NOTHING' SCENARIO</b></p> <p>Allow existing Policies WP3 and WP4 to expire in 2021.</p>	XX	XX	X	X	X				XX	XX	X	X	X	X	X	X

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>COMMENTARY</b> Proposed Policy WP3 'Existing Waste Sites' is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London by ensuring that all existing safeguarded waste management sites (listed in Pages 42-90 of the Issues and Preferred Options document) are carried forward in the new Plan and safeguarded for waste uses only; and by ensuring that compensatory provision is made to make up for the loss of any safeguarded site within the South London Waste Plan area</p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by promoting the intensification of uses on suitable sites in order to allow greater throughput (where there are not likely to be unacceptable impacts on the local road network); supporting waste operators who are seeking to increase the waste management element of waste transfer stations; and eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the local road network and the environment arising from new waste facilities and associated HGV movements).</p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> as far as practicable within South London towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026 by ensuring that any proposed development on an existing safeguarded waste site is required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development. However, as highlighted in Paragraph 5.26 of the Issues and Preferred Options document, there will inevitably be some occasions where the nature of waste facility will mean that waste operations cannot easily rise up the waste hierarchy by intensification. Not safeguarding the Beddington Farmlands landfill site in LB Sutton following its scheduled closure in 2023 is also expected to boost waste recovery rates rather than disposal, thereby moving waste management practices further up the waste management hierarchy</p> <p>(9) Promoting <b>sustainable transport</b> objectives by avoiding the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the local road network arising from HGV movements); seeking to minimise traffic congestion and air pollution arising from existing or upgraded waste management facilities for example by intensifying existing waste management uses on suitable sites or by co-locating complementary uses in industrial areas such as secondary material processing facilities; and by <i>not</i> providing compensatory provision within the partner south London boroughs to make up for any loss of waste management capacity outside of the plan area.</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses by avoiding the need to identify additional waste management sites or 'broad locations' in South London thereby reducing air pollution from additional waste-related HGV movements; promoting intensification on suitable safeguarded sites; co-locating complementary uses in industrial areas; working with waste operators to encourage a shift from waste transfer operations to waste management practices.</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and by working with waste operators to develop more efficient and effective management practices.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London by seeking to drive waste management practices on intensified sites up the Government's waste hierarchy.</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste management activities in South London by eliminating the need for additional waste management sites and associated HGV movements; and working with waste operators to develop more efficient, effective and cleaner management practices through the intensification of existing safeguarded sites. It should be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP.</p> <p>(11) Protecting the quality of <b>South London's environment</b>, particularly for vulnerable receptors, by avoiding the adverse impacts of noise, vibration, dust, light, soil contamination, odour and water pollution during both the construction and operational phases that would otherwise arise from the development of new waste management sites (either to exceed the apportionment for South London and/or to compensate for a loss of capacity outside the plan area). However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity' and Policy WP6 'Sustainable Design and Construction of Waste Facilities'.</p> <p>(12) Protecting <b>biodiversity and habitats</b> by eliminating the need for additional waste management sites within south London and associated NO<sub>2</sub> emissions from HGV movements</p> <p>(14) Minimising the potentially adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London, primarily by eliminating the need for additional sites and also by promoting the more efficient use of industrial land to increase throughputs e.g. for C&amp;D waste streams. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity'.</p> <p>(15) Minimising the potentially adverse effects on <b>human health and the open environment</b>, particularly within areas affected by social deprivation, by eliminating the need for additional waste management sites in south London. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity'.</p> <p>(16) Promoting <b>equalities, accessibility and social inclusion</b> by minimising the adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues, that would otherwise arise from the development of new waste management sites within south London, either to exceed the apportionment for South London and/or to compensate for any loss of capacity outside the plan area. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity' and Policy WP6 'Sustainable Design and Construction of Waste Facilities'.</p> <p><u>NEUTRAL/ NO IMPACT (++) FOR:</u></p> <p>(6) Ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b>.</p> <p>(7) Promoting <b>sustainable drainage (SuDS) measures</b> in all new or upgraded waste management facilities.</p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> in all new, upgraded or intensified waste management facilities</p> <p><u>CONCLUSIONS</u></p> <p>The outcome of the appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four partner boroughs, Proposed Policy WP3 will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to carrying forward the existing strategic approach set out in Policies WP3 and WP4 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP3 are overwhelmingly negative.</p>															

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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standard of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>POLICY WP4: SITES FOR COMPENSATORY PROVISION (unchanged)</b>															
<b>OPTION 1: PROPOSED POLICY WP4</b>															
Proposals for new waste sites to provide compensatory provision should:															
(a) Demonstrate that the site is capable of providing suff. compensatory capacity.															
(b) Be located on sites:															
(i) within SILs or Locally Significant Industrial Location;															
(ii) not having an adverse effect on nature conservation areas protected by international or national regulations;															
(iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and															
(iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted in FZss 3a or 3b.															
Consider the advantages of the co-location of waste facilities with the mitigative cumulative effects of a concentration of waste uses in one area															
(d) Have particular regard to sites which:															
(i) do not result in visually detrimental development conspicuous from strategic open land (e.g. Green Belt or MOL);															
(ii) are located more than 100 metres from open space;															
(iii) are located outside Groundwater Source Protection Zones (i.e. farthest from protected groundwater sources)															
(iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk															
(v) have direct access to the SRN;															
(vi) have no Public Rights of Way crossing the site;															
(vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views; or															
(viii) offer opportunities to accommodate various related facilities on a single site.															
++	++	+?	+?	+	++	+++	+++?	++	+	++	++	+	++	++	++
<b>OPTION 2: EXISTING PLAN</b>															
Carry forward Policy WP5 in existing SLWP															
++	+	+?	+?	+?	+	++	+?	+	+?	+	+	+?	+?	+?	+?
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b>															
Existing Policy WP5 expires in 2021															
XX	XX	X	X	X	XX	XX	XX	XX	X	XX	XX	X	XX	XX	XX

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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>COMMENTARY</b> Proposed Policy WP4 'Sites for Compensatory Provision' is predicted to have:</p> <p><b>LARGE BENEFICIAL IMPACTS (+++) FOR:</b></p> <p>(7) Avoiding, reducing and managing flood risk from new waste management sites introduced for the purpose of providing compensatory capacity within the south London Plan area by ensuring that they have no adverse effects of on-site or off-site flood risks in accordance with the relevant Local Plan policies of the four partner boroughs; the sequential and exceptions tests in government planning practice guidance and detailed technical advice in the respective strategic flood risk assessment (SFRA) reports produced for each borough. However these beneficial impacts are dependent on the implementation of these other policies as appropriate e.g. requiring SuDS measures and meeting the requirement for greenfield run-off rates and volumes in the 1 in 100 year storm event plus climate change – see part (b)(iv).</p> <p><b>MEDIUM BENEFICIAL IMPACTS (++) FOR:</b></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London by requiring planning applications for new waste sites to demonstrate that the proposed waste management facility is capable of providing sufficient compensatory capacity to make up for the loss of any safeguarded site within the South London Waste Plan area - see part (a).</p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by ensuring that any new waste facilities give full consideration to range of locational constraints and opportunities with respect to the strategic road network, flood risk, strategic open land, public open space, protected groundwater sources, accessibility to sustainable modes of transport, public rights of way, nature conservation areas, Conservation Areas, Areas of Special Local Character (ASLC) and strategic views. The advantages of co-location will be balanced against the potential negative impacts arising from an over-concentration of waste operations in one locality – see part (c).</p> <p>(6) Ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b>, primarily - in the case of Policy WP4 - by ensuring that such sites have no adverse effects in relation to on or off-site flood risks in accordance with the relevant Local Plan policies of the four partner boroughs; the sequential and exceptions tests in government planning practice guidance and detailed technical advice in the respective strategic flood risk assessment (SFRA) reports produced for each borough (see above). However, this positive assessment is subject to the relevant Local Plan policies being applied and enforced by the respective local planning authorities.</p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> by ensuring that all new waste management facilities within the plan area comply with the relevant environmental criteria set out in parts (a) to (e);</p> <p>(9) Promoting <b>sustainable transport</b> objectives by having particular regard to sites which have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk – see part (d)(iv).</p> <p>(11) Minimising potential risks to human health, adjacent land uses and the local environment by only permitting new waste management sites where it can be demonstrated that the proposed facility is needed to provide compensatory capacity in South London and ensuring that all new waste management facilities within the plan area comply with the relevant environmental criteria set out in parts (a) to (e);</p> <p>(12) Protecting <b>biodiversity and habitats</b> by 'having particular regard to' potential waste management sites which do not have an adverse effect on nature conservation areas protected either by international or national regulations or which are designated in the respective Local Plans of the four partner boroughs. In "meeting the policies of the relevant development plan" under part (f), the requirement upon developers to apply a biodiversity accounting methodology to demonstrate that there is no net loss in biodiversity value may come into play in some circumstances e.g. LB Sutton. Potential adverse impacts on biodiversity and habitats will also be minimised by ensuring that any new waste management facilities are steered towards SILs or locally significant industrial locations</p> <p>(14) Minimising the potentially adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London by 'having particular regard to' sites which do not result in visually detrimental development conspicuous from strategic open land; are located more than 100 metres from open space; and do not adversely affect Conservation Areas, Areas of Special Character or strategic views.</p> <p>(15) Minimising the potentially adverse effects on <b>human health and the open environment</b>. by ensuring that any new waste management facilities are steered towards Strategic Industrial Locations (SILs) or locally significant industrial locations; and by 'having particular regard to' sites which do not result in visually detrimental development conspicuous from strategic open land; are located more than 100 metres from open space; and by including appropriate environmental mitigation measures under part (e). Potentially adverse impacts on human health and the open environment will also be minimised by ensuring that any new waste facilities are only located within SILs or locally significant industrial locations</p> <p>(16) Promoting <b>equalities, accessibility and social inclusion</b> by only permitting new waste sites where it can be demonstrated that the proposed waste management facility is genuinely needed to compensate for the loss of any safeguarded site within the South London Waste Plan area, thus avoiding additional adverse environmental impacts on vulnerable receptors (including equalities target groups) and the strategic road network which would otherwise arise from allowing a greater number of 'windfall' sites to be developed on unsuitable locations. Potential adverse impacts on equalities target groups will also be minimised by ensuring that any new waste management facilities are steered towards SILs or locally significant industrial locations and do not conflict with Public Rights of Way - see parts (b)(i) and (d)(vi).</p> <p><b>SMALLER BENEFICIAL IMPACTS (+) FOR:</b></p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London by giving consideration to the potential advantages of co-location of waste facilities in driving waste management up the Government's waste hierarchy. However, this assessment is subject to the other relevant policies of the SLWP and the respective Local Plans being fully implemented - see part (f).</p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London, again by giving consideration to the potential advantages of co-location of waste facilities in driving waste management up the Government's waste hierarchy. However, this assessment is subject to the other relevant policies of the SLWP and the respective Local Plans being fully implemented - see part (f).</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste management activities in South London by only permitting new waste sites where it can be demonstrated that the proposed waste management facility is genuinely needed to compensate for the loss of any safeguarded site within the SLWP area, thus minimising additional CO<sub>2</sub> emissions that would otherwise arise from new waste management facilities and associated HGV movements.</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'.</p> <p>(13) Promoting <b>local employment</b> by only permitting new waste sites where it can be demonstrated that the proposed facility is genuinely needed to compensate for the loss of any safeguarded site within the SLWP area, thus avoiding the unnecessary loss of employment land across the south London area. This is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest.</p> <p><b>CONCLUSIONS</b></p> <p>The outcome of the appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four partner boroughs, Proposed Policy WP4 will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to carrying forward the existing approach to the consideration of additional non-safeguarded 'windfall' sites set out in Policy WP5 of the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan incorporating Proposed Policy WP4 are overwhelmingly negative.</p>															

SA FRAMEWORK OBJECTIVES																	
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING					
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION		
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standard of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve		
<b>POLICY WP5: PROTECTING AND ENHANCING AMENITY (unchanged)</b>																	
<b>OPTION 1: PROPOSED POLICY WP5</b>																	
(a) Developments for compensatory/intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment. (b) The parts of a [site] where unloading, loading, storage and processing takes place should be in a fully enclosed covered building. (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected; (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas (iv) Groundwater, surface water and watercourses (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated (vi) Noise and vibration from the plant and traffic generated (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials (viii) The safety and security of the site (ix) Odour, litter, vermin and birds; and, (x) The design of the facility, particularly: <ul style="list-style-type: none"> <li>• complementing or improving the character of an area;</li> <li>• limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;</li> <li>• being of a scale, massing or height appropriate to the townscape or landscape;</li> <li>• using good quality materials;</li> <li>• minimising the requirement for exterior lighting; and,</li> <li>• utilising high-quality boundary treatments.</li> </ul>																	
+	++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+++	+++	+++
OPTION 2: EXISTING PLAN	+	++	++	++	++	++	++	++	++	++	++	++	++	+	++	++	++
Carry forward Policy WP7 in SLWP 2012	+	++	++	++	++	++	++	++	++	++	++	++	++	+	++	++	++
OPTION 3: 'DO-NOTHING' SCENARIO	X	X	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	X	XX	XX	XX
Existing Policy WP7 expires in 2021	X	X	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	X	XX	XX	XX

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>COMMENTARY</b> Proposed Policy WP5 'Protecting and Enhancing Amenity' is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London by requiring a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development;</p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London and keeping products and materials at their highest use for as long as possible, again by requiring a Circular Economy Statement to be submitted;</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste and associated HGV movements by requiring an Energy Assessment, BREEAM assessment ('Excellent' rating), Transport Assessment and Travel Plan to be submitted in support of any application;</p> <p>(6) Ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b> including flooding, overheating, contribution to the urban heat island (UHI) effect and drought by requiring a Flood Risk Assessment (FRA), SuDS strategy, BREEAM assessment and sustainability statement;</p> <p>(7) Promoting <b>sustainable drainage (SuDS) measures</b> and greenfield run-off rates by 'having particular regard' to the potentially adverse impacts of compensatory or intensified waste developments on groundwater, surface water and watercourses and by requiring a Flood Risk Assessment (FRA), SuDS strategy/site drainage details and hydrological assessment to be submitted. As shown in the Sequential Test (Appendix 3), proposed waste facility located within higher flood risk areas will be required to demonstrate the Government's 'Exceptions test' in order to demonstrate that the development will provide (i) wider sustainability benefits to the community that outweigh flood risk, and (ii) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall;</p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> in all such facilities by requiring a BREEAM assessment ('Excellent' rating) and sustainability statement to be submitted in support of any planning application. For larger waste management proposals with potentially 'significant' effects, an Environmental Assessment may be required under the EIA Regulations 2017 where this has been 'screened in' by the relevant local planning authority;</p> <p>(9) Promoting <b>sustainable transport</b> objectives by requiring an Air Quality Impact Assessment, Transport Assessment, Travel Plan, Route Management Strategy and Delivery Servicing Plan/Freight Plan to be submitted as appropriate in support of any planning application for a proposed compensatory or intensified waste development, in order to demonstrate any transport impacts do not significantly adversely affect people and the environment;</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses arising, particularly within 'Air Quality Focus Areas' by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building and requiring the submission of Air Quality Impact Assessments, Transport Assessments, Travel Plans, Route Management Strategies and Delivery Servicing Plans/Freight Plans as appropriate;</p> <p>(11) Protecting the quality of <b>South London's environment</b>, particularly for vulnerable receptors, by ensuring that any potential adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment. More specifically, under Part (c) of this policy, any planning application for such development must be accompanied by an Air Quality Impact Assessment, Transport Assessment and Travel Plan, and 'have particular regard' to the potentially adverse impacts on open space; biodiversity and nature conservation sites; archaeological sites; the historic environment; sensitive receptors, such as schools, hospitals and residential areas; groundwater, surface water and watercourses; air emissions, including dust noise and vibration and traffic generation. arising from waste management operations and associated HGV movements</p> <p>(12) Protecting <b>biodiversity and habitats</b> by 'having particular regard' to the potentially adverse impacts on biodiversity and nature conservation sites protected by international/ national regulations or local planning designations and by requiring a Biodiversity Assessment to be submitted in support of any planning application which is likely to affect nature conservation areas such as Local Nature Reserves, Sites of Metropolitan, Borough or Local Importance for Nature Conservation (SINCs), or green corridors. In certain cases (e.g. LB Sutton) biodiversity accounting evidence will need to be submitted to demonstrate that there will be no net loss of biodiversity value arising from the development.</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by requiring job creation details, including skills, training and apprentice opportunities, together with a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development</p> <p>(14) Minimising the adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London by ensuring that all compensatory or intensified waste developments are of a scale, massing or height appropriate to the local townscape or landscape; minimising the requirement for exterior lighting; utilising high-quality boundary treatments; and having 'particular regard' to the potentially adverse impacts on the historic environment. Under this policy, any potentially adverse impacts on townscape and visual amenity will be addressed or mitigated by requiring the submission of an assessment of the impact on the built and historic environment, a landscape assessment and details of landscaping proposals, including screening, landscaping works and boundary treatments to be submitted in support of any planning application;</p> <p>(15) Minimising any potentially adverse effects on <b>human health and the open environment</b>, particularly within areas affected by social deprivation, by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building. Planning applications for a proposed compensatory or intensified waste development must be accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. Details of appropriate measures for protecting Public Rights of Way are also required to be submitted where relevant</p> <p>(16) Promoting <b>equalities, accessibility and social inclusion</b> by requiring an Access Strategy to be submitted in support of any planning application. Since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way is also beneficial.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed to achieve levels that will not significantly adversely affect people and the environment; and by requiring applications to be supported by the relevant information listed in the schedule attached to Policy WP5, including a Circular Economy Statement.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London by allowing for developments for compensatory or intensified waste facilities to proceed <i>subject to</i> meeting the requirements of Policy WP4 'Sites for Compensatory Provision' and provided that it can be demonstrated that 'any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment' as required in Part (a)</p> <p><u>CONCLUSIONS</u></p> <p>The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP5 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP5 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative</p>															



SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standard of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES (amended)</b>															
<b>OPTION 1: PROPOSED POLICY WP6</b>															
(a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies of the relevant borough's Development Plan. (b) Waste facilities will be required to: (i) minimise on-site carbon dioxide emissions in line with 2020 London Plan Policy S12; (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with 2020 London Plan Policy G5; (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials; (v) minimise waste and promote sustainable management of construction waste on site; and, (vi) protect, manage and enhance local habitats and biodiversity.															
+?	++	+++	+++	+++	+++	+++	+++	++	+++	+++	++	++	+	+++	+++
<b>OPTION 2: EXISTING PLAN</b>															
Carry forward Policy WP6 from SLWP 2012															
+?	+	++	++	++	++	++	++	+	++	++	+	+	+	++	++
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b>															
Allow existing Policy WP6 to expire in 2021															
X	X	XX	XX	XX	XX	XX	XX	X	XX	XX	X	X	XX	XX	XX

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>COMMENTARY</b> Proposed Policy WP6 'Sustainable Design and Construction of Waste Facilities' This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that, where appropriate, the sustainability credentials of a waste development can be measured against the BRE's 'CEQUAAL' scheme in place of the BREEAM New Construction scheme. It is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by requiring all waste developments to achieve an 'Excellent' rating under the appropriate BREEAM scheme or under the BRE's CEQUAAL scheme; to make more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement; to demonstrate that they minimise waste and promote sustainable management of construction wastes on site; to minimise on-site CO<sub>2</sub> emissions in line with the 35% target in Policy SI2 of the draft new London Plan and deliver net zero carbon standards through carbon offsetting; and to require all waste developments to give consideration to the recycling of CD&amp;E waste on-site.</p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London by requiring all proposed waste developments to achieve BREEAM 'Excellent' where viable; demonstrate how it will make more efficient use of resources and reduce the lifecycle impacts of construction materials; demonstrate how it will support circular economy principles through the submission of a Circular Economy Statement (as required under Policy WP5); and demonstrate that the facility will minimise waste and promote sustainable management of construction wastes on site.</p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London and keeping products and materials at their highest use for as long as possible by requiring submission of a Circular Economy Statement (as required under Policy WP5) and by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&amp;E) waste on-site</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste and associated HGV movements by requiring all major waste developments to minimise on-site CO<sub>2</sub> emissions in line with the 35% target in Policy SI2 of the draft new London Plan; deliver net zero carbon standards through developer contributions to the respective carbon offset funds operated by each of the four boroughs; and requiring all waste developments to achieve BREEAM 'Excellent' where viable.</p> <p>(6) Ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b> in accordance with Draft London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; and by requiring all waste developments to have regard to best practice in 'Designing Waste Facilities - A Guide to Modern Design in Waste' (DEFRA, 2008) in considering climate change adaptation measures in schemes e.g. by ensuring that building layout takes advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter; by ensuring that external cladding materials are high mass (e.g. brick or concrete) as they release heat slowly; and by steering storage and unoccupied areas towards the warmest areas of the facility.</p> <p>(7) Avoiding reducing and managing <b>flood risk to and from waste developments</b> by incorporating appropriate SuDS measures in line with Draft London Plan Policy G5, the partner boroughs' Strategic Flood Risk Assessments (SFRAs) and the relevant local planning policies. This requires developers to provide details of the design storm period and intensity, proposed SuDS measures to delay and control the rate of surface water discharged from the site and proposed measures to prevent pollution of the receiving groundwater and/or surface waters. In most cases, proposed waste developments will need to demonstrate that (i) the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be as close as reasonably practicable to the greenfield run-off rate for the same event (in line with the Government's non-statutory standards) (ii) where greenfield run-off rates cannot be achieved, to demonstrate that the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be no more than 3 times the calculated greenfield run-off rate for the same event (iii) demonstrate that the 1 in 30 year rainfall event (plus 30% for climate change) can be contained without flooding; any flooding occurring between the 1 in 30 and 1 in 100 year event (plus 30% for climate change) will be safely contained on site; and that rainfall in excess of the 1 in 100 year event is managed to minimise risks. For locations within the River Wandle catchment, all waste developments must support the objectives of the River Wandle Catchment Flood Management Plan (CFMP).</p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> in all such facilities by requiring all waste developments to achieve BREEAM 'Excellent' where viable and, as part of the construction phase, by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&amp;E) waste on-site.</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses arising by making more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement and by requiring all waste developments to incorporate appropriate measures to address odour issues, for example by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5.</p> <p>(11) <b>Minimising the adverse impacts arising from the construction and operation of waste facilities</b> by requiring all waste developments to achieve BREEAM 'Excellent' where viable; to have regard to DEFRA best practice; to protect, manage and enhance local habitats and biodiversity; to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures which manage risk both to and from the development over its planned lifetime</p> <p>(15) Minimising any potentially adverse effects on <b>human health and the open environment</b>, particularly within areas affected by social deprivation, by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5</p> <p>(16) Promoting <b>equalities, accessibility and social inclusion</b> by ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b> in accordance with Draft London Plan Policy GG6. Climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as, such as the young, the elderly and people suffering from respiratory issues</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(9) Promoting <b>sustainable transport</b> objectives by requiring all waste developments to demonstrate that they minimise waste and promote sustainable management of construction wastes on site.</p> <p>(12) Protecting <b>biodiversity and habitats</b> by requiring all waste developments to demonstrate that they 'protect, manage and enhance local habitats and biodiversity' for example by incorporating green roofs and other blue and green infrastructure measures as appropriate. However this is also subject to the implementation of part (c) of Policy WP5 which seeks to ensure that that development does not harm nature conservation areas</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by making more efficient use of resources and promoting circular economy principles.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London and (14) Minimising the adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London.</p> <p><u>CONCLUSIONS</u></p> <p>The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP6 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative.</p>															



	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standard of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>POLICY WP7: THE BENEFITS OF WASTE (unchanged)</b>																
<b>OPTION 1: PROPOSED PLAN - POLICY WP7</b> (a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged. (b) Waste development for additional Energy from Waste facilities will not be supported (c) Waste development for the intensification of sites should seek result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.	+++	+++	+++	+++	+++			++?		+++	++?	+	+++		+++	+++
<b>OPTION 2: EXISTING PLAN</b> Carry forward Policy WP8 from SLWP 2012.	++	++	++	++	++			++		++	++	+	+		++	++
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policy WP8 to expire in 2021.	XX	XX	XX	XX	XX			X		XX	X	X	X		XX	XX

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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) <b>NET SELF-SUFFICIENCY</b> To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	(2) <b>SPATIAL STRATEGY</b> To optimise new & existing waste sites to make the most efficient use of industrial land	(3) <b>RECYCLING &amp; RECOVERY</b> To drive waste management up the waste hierarchy.	(4) <b>CIRCULAR ECONOMY</b> To promote a transition to a circular economy within south London.	(5) <b>CLIMATE MITIGATION</b> To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) <b>CLIMATE ADAPTATION</b> To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) <b>FLOOD RISK &amp; SuDS</b> To avoid, reduce and manage flood risk to or from waste management facilities	(8) <b>SUST. DESIGN</b> To promote the highest standards of sustainable design and construction.	(9) <b>SUSTAINABLE TRANSPORT</b> To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) <b>AIR QUALITY</b> To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) <b>ENVIRONMENTAL PROTECTION</b> To minimise the adverse impacts during construction & operation of waste facilities	(12) <b>BIODIVERSITY AND HABITATS</b> To protect and enhance biodiversity & habitats	(13) <b>ECONOMY &amp; EMPLOYMENT</b> To promote employment, & competitiveness of the waste sector in Sth London	(14) <b>TOWNSCAPE AND VISUAL AMENITY</b> To minimise adverse impacts on townscape quality and visual amenity	(15) <b>HEALTH &amp; QUALITY OF LIFE</b> To minimise adverse on human health and protect the open environment	(16) <b>EQUALITIES, &amp; SOCIAL INCLUSION</b> To reduce exclusion, address inequalities & improve
<b>COMMENTARY</b>	<p><b>Proposed Policy WP7 'The Benefits of Waste' is predicted to have::</b></p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting <b>net self-sufficiency</b> within South London by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products.</p> <p>(2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products; and by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy.</p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products, such as biogas from composting and refuse-derived fuel.</p> <p>(4) Helping to secure the transition to a <b>circular economy</b> within south London and keeping products and materials at their highest use for as long as possible while by recognising that achieving London-wide waste reduction and recycling targets will mean that no new EfW in London will be needed.</p> <p>(5) <b>Minimising CO<sub>2</sub> emissions</b> from waste and associated HGV movements by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products?</p> <p>(10) Minimising <b>air pollution</b> and potential impacts on sensitive land-uses by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas</p> <p>(15) Minimising any potentially adverse effects on <b>human health and the open environment</b>, particularly within areas affected by social deprivation, by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)</p> <p>(16) Promoting <b>equalities, accessibility and social inclusion</b> by ensuring that by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(8) Promoting the highest standards of <b>sustainable design and construction</b> by encouraging waste treatment applications which achieve a prolonged product life (i.e. through reuse and refurbishment), provide secondary materials through remanufacture, lead to the production of by-products, such as biogas from composting and refuse derived fuel</p> <p>(11) <b>Minimising the adverse impacts arising from the construction and operation of waste facilities</b> by encouraging proposals for the intensification of existing waste management sites</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(12) Protecting <b>biodiversity and habitats</b> by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy.</p> <p><u>NEUTRAL IMPACTS FOR:</u></p> <p>(6) Ensuring that all new or upgraded waste management facilities are <b>fully adapted to the future impacts of climate change</b>.</p> <p>(7) Avoiding reducing and managing <b>flood risk to and from waste developments</b>.</p> <p>(9) Promoting <b>sustainable transport</b> objectives.</p> <p>(14) Minimising the adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity</b> in south London. n/a</p> <p><u>CONCLUSIONS</u></p> <p>The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP7 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan are generally negative.</p>														

	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standard of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES (new policy)</b>																
<b>OPTION 1: PROPOSED POLICY WP8</b> (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them. (b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, the applicant should: Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision. (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations.	+	+	+			+	+		++	++		+		++	+	
<b>OPTION 2: EXISTING PLAN</b> Not applicable.	N/A															
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Do not include NEW POLICY W8 in draft SLWP for submission.	x?	x?	x?			x?	x?		x	x		x?		x	x?	

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) <b>NET SELF-SUFFICIENCY</b> To provide sufficient sites and waste facilities for all waste streams making up the apportionment	(2) <b>SPATIAL STRATEGY</b> To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) <b>RECYCLING &amp; RECOVERY</b> To drive waste management up the hierarchy.	(4) <b>CIRCULAR ECONOMY</b> To promote a transition to a circular economy within south London.	(5) <b>CLIMATE MITIGATION</b> To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) <b>CLIMATE ADAPTATION</b> To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) <b>FLOOD RISK &amp; SuDS</b> To avoid, reduce and manage flood risk to or from waste management facilities	(8) <b>SUST. DESIGN</b> To promote the highest standards of sustainable design and construction.	(9) <b>SUSTAINABLE TRANSPORT</b> To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) <b>AIR QUALITY</b> To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) <b>ENVIRONMENTAL PROTECTION</b> To minimise the adverse impacts during construction & operation of waste facilities	(12) <b>BIODIVERSITY AND HABITATS</b> To protect and enhance biodiversity & habitats	(13) <b>ECONOMY &amp; EMPLOYMENT</b> To promote employment, & competitiveness of the waste sector in Sth London	(14) <b>TOWNSCAPE AND VISUAL AMENITY</b> To minimise adverse impacts on townscape quality and visual amenity	(15) <b>HEALTH &amp; QUALITY OF LIFE</b> To minimise adverse on human health and protect the open environment	(16) <b>EQUALITIES, &amp; SOCIAL INCLUSION</b> To reduce exclusion, address inequalities & improve
<b>COMMENTARY</b>	<p><b>Proposed Policy WP8 'New Development Affecting Waste Sites'</b> is a new policy to reflect the requests from SUEZ (Representation C20/10) and Veolia (Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy. Proposed Policy WP8 is considered to have:</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(10) Helping to minimise the potential impacts of <b>air pollution</b> on sensitive land-uses by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures such as planting and screening ('agent of change' principle).</p> <p>(11) Helping to minimise <b>adverse impacts arising from the operation of waste facilities</b> on sensitive land-uses by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures ('agent of change' principle).</p> <p>(15) Helping to minimise potentially adverse effects on <b>human health</b> arising from air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures such as planting, sustainable drainage measures (SuDS) and screening ('agent of change' principle).</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(1) Helping to promote <b>net self-sufficiency</b> within South London over the plan period to 2036 by avoiding unreasonable restrictions being placed on existing operational or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision.</p> <p>(2) Helping to promote an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by enabling existing, extant, permitted or intensified sites to continue in operation and therefore avoid the need for new waste sites to be developed in less suitable locations.</p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London, again by avoiding unreasonable restrictions being placed on existing operational or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision.</p> <p>(7) Helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> by ensuring that that newly proposed developments located within the vicinity of operational waste sites and within flood risk areas incorporate appropriate flood risk alleviation works and sustainable drainage (SuDS) measures.</p> <p>(8) Helping to promote the highest standards of <b>sustainable design and construction</b> by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate appropriate measures to mitigate the impacts of air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by avoiding unreasonable restrictions being placed on existing or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision.</p> <p>(16) Helping to promote <b>equalities, accessibility and social inclusion</b> within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities;</p> <p><u>NEUTRAL IMPACTS FOR:</u></p> <p>(6) Helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b>.</p> <p>(4) Helping to secure the transition to a circular economy within south London.</p> <p>(5) Helping to <b>minimising CO<sub>2</sub> emissions</b>.</p> <p>(9) Helping to deliver <b>sustainable transport</b> objectives.</p> <p>(12) Helping to promote <b>biodiversity and habitats</b></p> <p>(14) Helping to minimise adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b>.</p> <p><u>CONCLUSIONS</u></p> <p>Through the introduction of the 'agent of change' principle, the appraisal shows that Proposed Policy WP8 is likely to have certain benefits in terms of minimising the potential impacts of existing or intensified waste sites, extant schemes, permitted schemes or sites developed for compensatory provision on human health and quality of life arising from air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance by ensuring that nearby sensitive developments incorporate good design and appropriate mitigation measures such as planting, sustainable drainage measures (SuDS) and screening.</p>														

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standard of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>POLICY WP9: PLANNING OBLIGATIONS (unchanged)</b>															
<b>OPTION 1: PREFERRED POLICY</b> Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.	+	++		+	+	++	++	++	++	++	++	++	++	++	++
<b>OPTION 2: EXISTING PLAN</b> Carry forward Policy WP9 from the 2012 Plan.	+	++		+	+	++	++	++	++	++	++	++	++	++	++
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policy WP9 to expire in 2021.	?	?		?	?	?	?	?	?	?	?	?	?	?	?



SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
COMMENTARY	<p><b>Proposed Policy WP9 'Planning Obligations</b> is predicted to have::</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(2) Helping to promote an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation sites of international, national, regional or local importance; environmental enhancement measures; flood risk compensation works; archaeological investigation, recording and keeping of artefacts and safeguarding of remains; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; job brokerage, training and skills to encourage local employment opportunities; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.</p> <p>(6) Helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> by potentially providing for flood risk alleviation works, off-site monitoring of the water environment, off-site planting, environmental enhancement measures and other climate change adaptation measures. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.</p> <p>(7) Helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> by potentially contributing towards for off-site flood risk alleviation works.</p> <p>(8) Helping to promote the highest standards of <b>sustainable design and construction</b> by potentially providing for low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation; or flood risk alleviation works</p> <p>(9) Helping to deliver <b>sustainable transport</b> objectives by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; off-site monitoring of emissions; and any other strategic transport infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.</p> <p>(10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; environmental enhancement measures; off-site monitoring of emissions and the water environment; and the provision and management of off-site or advance planting and screening measures.</p> <p>(11) Helping to minimise the <b>adverse impacts arising from the construction and operation of waste facilities</b> by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.</p> <p>(12) Helping to promote <b>biodiversity and habitats</b> through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures</p> <p>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> by potentially providing for job brokerage, training and skills to encourage local employment opportunities; and the delivery of key strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs</p> <p>(15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b> by potentially providing for additional traffic management measures (including the routing of vehicles; access and highway improvements); protection of nature conservation sites of international, national, regional or local importance; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; low or zero carbon infrastructure;; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures; and other environmental enhancement measures</p> <p>(16) Helping to promote <b>equalities, accessibility and social inclusion</b> within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities;</p> <p>It should be noted however that, under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(1) Helping to promote net self-sufficiency within South London by enabling proposals for the intensification of existing waste management sites or compensatory provision to proceed which may otherwise be unacceptable in planning terms.</p> <p>(4) In certain circumstances, helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by potentially providing for low or zero carbon infrastructure and carbon offsetting contributions. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.</p> <p>(5) Helping to <b>minimising CO<sub>2</sub> emissions</b> in certain circumstances by providing for access and highway improvements; low or zero carbon infrastructure or carbon offsetting contributions.</p> <p>(14) Helping to minimise the adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity and the historic environment</b> in south London by potentially providing for environmental enhancement measures; the provision and management of off-site or advance planting and screening measures; and archaeological investigation, recording and keeping of artefacts and safeguarding of remains.</p> <p><u>NEUTRAL IMPACTS FOR:</u></p> <p>(3) Promoting <b>waste re-use, recycling and recovery</b> within South London.</p> <p><u>CONCLUSIONS</u></p> <p>The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP8 is likely to have beneficial impacts on the majority of sustainability objectives making up the SA Framework and these beneficial impacts are broadly unchanged from Policy WP8 of the existing SLWP 2012 (since the policy wording has been carried forward unchanged).. While the effects of <i>not</i> proceeding with a new waste plan and therefore deleting Policy WP8 of the existing SLWP 2012 are appraised as uncertain, rather than necessarily negative, since under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy</p>														




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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standard of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>POLICY WP10: MONITORING AND CONTINGENCIES (new policy)</b>															
<b>OPTION 1: PROPOSED POLICY WP10</b>															
The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.															
++	++	++	++	+	+	+	++	++	++	++	+	+		++	+
<b>OPTION 2: EXISTING PLAN</b>															
Not applicable.															
N/A															
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b>															
Do not include NEW POLICY W8 in draft SLWP for submission.															
x	x	x	x	x?	x?	x?	x	x	x	x	x?	x?		x	x?

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) <b>NET SELF-SUFFICIENCY</b> To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment	(2) <b>SPATIAL STRATEGY</b> To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) <b>RECYCLING &amp; RECOVERY</b> To drive waste management up the waste hierarchy.	(4) <b>CIRCULAR ECONOMY</b> To promote a transition to a circular economy within south London.	(5) <b>CLIMATE MITIGATION</b> To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) <b>CLIMATE ADAPTATION</b> To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) <b>FLOOD RISK &amp; SuDS</b> To avoid, reduce and manage flood risk to or from waste management facilities	(8) <b>SUST. DESIGN</b> To promote the highest standards of sustainable design and construction.	(9) <b>SUSTAINABLE TRANSPORT</b> To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) <b>AIR QUALITY</b> To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) <b>ENVIRONMENTAL PROTECTION</b> To minimise the adverse impacts during construction & operation of waste facilities	(12) <b>BIODIVERSITY AND HABITATS</b> To protect and enhance biodiversity & habitats	(13) <b>ECONOMY &amp; EMPLOYMENT</b> To promote employment, & competitiveness of the waste sector in Sth London	(14) <b>TOWNSCAPE AND VISUAL AMENITY</b> To minimise adverse impacts on townscape quality and visual amenity	(15) <b>HEALTH &amp; QUALITY OF LIFE</b> To minimise adverse on human health and protect the open environment	(16) <b>EQUALITIES, &amp; SOCIAL INCLUSION</b> To reduce exclusion, address inequalities & improve
<b>COMMENTARY</b>	<p><b>Proposed Policy WP10 'Monitoring and Contingencies'</b> is a new policy intruded to ensure that the SLWP meets statutory requirements for monitoring and the Mayor of London's request for contingencies. It is considered to have:</p> <p><b>MEDIUM BENEFICIAL IMPACTS (++) FOR:</b></p> <ul style="list-style-type: none"> <li>(1) Helping to meet the apportionment and <b>promote net self-sufficiency</b> for household and C&amp;I, CD&amp;E and other waste streams within South London by monitoring and reviewing waste imports and exports to and from surrounding regions and the performance of each site in terms of the nature of waste treatment operations, operational throughputs, intensification of uses and introduction of circular economy principles.</li> <li>(2) Helping to optimise and intensify new and existing waste sites within South London and make the most <b>efficient use of industrial land</b> by monitoring and reviewing the performance of each safeguarded site in terms of the nature of waste treatment operations, operational throughputs and the extent to which each site's potential for intensification has been realised.</li> <li>(3) Driving waste management up the waste hierarchy by monitoring rates of <b>waste re-use, recycling and recovery</b> within South London against the relevant targets established in the Mayor's Environmental Strategy 2018, the New London plan and the four Boroughs.</li> <li>(4) Promoting a transition to a <b>circular economy</b> within south London and keeping products and materials at their highest use for as long as possible by monitoring and reviewing the performance of each site in terms of the nature of waste treatment operations, operational throughputs, intensification and the co-location of complementary industrial uses</li> <li>(8) Helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities by monitoring achievement of the minimum standards required to achieve an 'Excellent' rating under either the BREEAM New Construction 2018 scheme (applicable to buildings) or the Building Research Establishment's (BRE) CEEQUAL scheme (applicable to associated waste infrastructure) – see Proposed Policy WP6 above</li> <li>(9) Helping to deliver <b>sustainable transport</b> objectives with the plan area by monitoring or requiring developers to monitor (i.e. through planning obligations) additional HGV movements arising from new, upgraded or intensified waste sites and associated impacts upon the local road network. Subject to resources, the ongoing monitoring of traffic management measures, vehicle routing schemes; access and highway improvements; transport emissions; and the effectiveness any other strategic transport infrastructure will also help to promote sustainable transport objectives in the context of waste management.</li> <li>(10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses by monitoring or requiring developers to monitor additional HGV movements arising from new, upgraded or intensified waste sites and associated impacts on air quality pollution particularly on sensitive land-uses.</li> <li>(11) Helping to minimise the <b>adverse impacts arising from the construction and operation of waste facilities</b> by monitoring the effectiveness of new traffic management measures, including the routing of HGVs; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure</li> <li>(15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b> by monitoring or requiring developers to monitor (i.e. through planning obligations) air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance potentially arising from the construction and operation of new or upgraded waste facilities in order to ensure compliance with the relevant planning policies and conditions, including the minimum standards required to achieve an 'Excellent' rating under either the BREEAM New Construction 2018 scheme (applicable to buildings) or the Building Research Establishment's (BRE) CEEQUAL scheme (applicable to associated waste infrastructure) – see Proposed Policy WP6 above</li> </ul> <p><b>SMALLER BENEFICIAL IMPACTS (+) FOR:</b></p> <ul style="list-style-type: none"> <li>(5) Helping to <b>minimise CO<sub>2</sub> emissions and address the causes of climate change</b> by requiring developers to undertake post-construction monitoring in accordance with the New London Plan 2020 (in line with the Mayoral principle of 'be seen').</li> <li>(6) Helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> in line with the minimum sustainability requirements of the New London Plan 2020 and environmental best practice by monitoring the implementation and effectiveness of climate change adaptation measures, such as flood risk alleviation works, SuDS measures, planting and other green infrastructure measures aimed at counteracting the urban heat island (UHI) effect</li> <li>(7) Helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> by monitoring the implementation and effectiveness of flood resistance/resilience measures, flood alleviation works and SuDS measures both on-site and off-site.</li> <li>(12) Helping to promote <b>biodiversity and habitats</b> through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures</li> <li>(13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b></li> <li>(16) Helping to promote <b>equalities, accessibility and social inclusion</b> within South London by monitoring or requiring developers to monitor (i.e. through the use of planning obligations) the implementation and effectiveness of access and highway improvements; environmental enhancement measures; air quality, water pollution, noise, light pollution and other sources of environmental nuisance potentially arising from the construction and operation of new or upgraded waste facilities. Monitoring of local employment provision and training opportunities will also help to contribute towards equalities objectives;</li> </ul> <p><b>NEUTRAL IMPACTS FOR:</b></p> <ul style="list-style-type: none"> <li>(14) Helping to minimise the adverse impacts of waste management facilities on the quality of <b>townscape and visual amenity and the historic environment</b> in South London</li> </ul> <p><b>CONCLUSIONS</b></p> <p>The results of the appraisal shows that, by ensuring that the implementation and effectiveness of the New SLWP 2021-2036 is monitored on an annual basis throughout the plan period against the relevant targets, Proposed Policy WP10 is predicted to have to have beneficial impacts on the majority of sustainability objectives making up the SA Framework. The tracking of progress against sustainability targets and allowing for contingencies is particularly important with respect to meeting the apportionment, achieving self-sufficiency, promoting the efficient use of industrial land, promoting the circular economy and minimising the impact of traffic movements, air pollution, water pollution, noise and light pollution arising from the construction and operation of waste facilities.</p>														






Part B: Proposed Sites



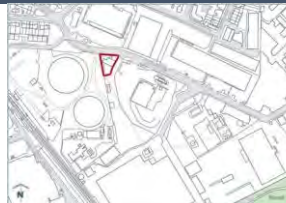
SA FRAMEWORK OBJECTIVES																								
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING												
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION									
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access									
<b>SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: CROYDON</b>																								
<b>C1 Able Waste Services</b> 42 Imperial Way, Croydon CR0 4RR																								
+++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+								
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site is comprised of mix of new and 1970s warehouses, mostly two-storey, located lies within the Imperial Way Industrial Estate which;</li> <li>good access to strategic road network;</li> <li>potential cumulative impact with New Era Metals ;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to MOL (250m south and east); Historic Park and Garden (250m south); SINC (250m south) and Croydon Panorama (250m east);</li> <li>not located within Air Quality Focus Area, Green Belt or MOL;</li> <li>low flood risk (Flood Zone 1); and</li> <li>low potential for intensification.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank; and</li> <li>providing appropriate soft landscaping and regard to the adjacent Roundshaw Park.</li> </ul> <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table>									<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	36	25	25	86
<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>																					
36	25	25	86																					
<b>C2 Days Aggregates</b> Purley Depot, Station Yard, Approach Road, Purley, Surrey, CR8 2AL (2.0 ha)																								
+++	+++	++	++	++		+		+	x?	x?		++	?	x	x?									
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>open aggregates sorting, treatment, recycling and storage facility with associated two-storey mid-century office block and enclosed sheds;</li> <li>reasonably isolated from nearby residential uses and no other waste uses nearby;</li> <li>access via Approach Road - a no through road serving Purley Station, Day Aggregates and London Concrete</li> <li>located adjacent to Purley rail aggregate terminal.</li> <li>located within Purley Cross and Russell Hill AQFA</li> <li>located within Archaeological Priority Area</li> <li>not located within Green Belt or MOL or any other designation</li> <li>Low flood risk (Flood Zone 1); and</li> <li>low potential for intensification (this is a dual-use site, with a minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level).</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>Protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts</li> <li>Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area (Place Specific Policy - Purley District Centre and environs (DM42.1)</li> <li>Not harming biodiversity in the vicinity</li> <li>Providing appropriate soft landscaping</li> </ul> <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table>									<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	36	25	25	86
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36	25	25	86																					
<b>C5A Factory Lane Transfer Station,</b> Factory Lane, Croydon CR0 3RL (1.2 ha)																								
+++	++ (potentially)	+	+	+	++ (potentially)	x	+	+	+	+	+	++ (potentially)	+	+	+	+								
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>large triple-storey building surrounded by hardstanding with power lines overhead;</li> <li>located within larger industrial area close to other waste facilities but away from residential neighbourhoods;</li> <li>good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236.</li> <li>located within Archaeological Priority Area;</li> <li>located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site.</li> <li>Located in close proximity to Wandle Park to the south east of the site.</li> <li>not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and</li> <li>some potential for intensification and for co-locating other waste uses on the site.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>Minimising flood risk on- and off-site</li> <li>Evaluating and preserving any remains in the Ampere Way archaeology priority area</li> <li>Not harming biodiversity in the vicinity</li> <li>Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> </ul> <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>42</td> <td>25</td> <td>25</td> <td>92</td> </tr> </table>									<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	42	25	25	92
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(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING										
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION							
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access							
<b>C5B Factory Lane Reuse &amp; Recycling Centre,</b> Factory Lane, Croydon CR0 3RL (0.4 ha)	++	+	+	++	+	X	+	+	+	+	+	+	+	+	+							
 <table border="1" data-bbox="44 819 400 955"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>19,736 tpa</td></tr> <tr><td>Licensed capacity</td><td>200,000 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	HCI	Max throughput	19,736 tpa	Licensed capacity	200,000 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>large triple-storey building surrounded by hardstanding with power lines overhead;</li> <li>located within larger industrial area close to other waste facilities but away from residential neighbourhoods;</li> <li>good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236.</li> <li>located within Archaeological Priority Area;</li> <li>located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site.</li> <li>Located in close proximity to Wandle Park to the south east of the site.</li> <li>not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and</li> <li>low potential for intensification.</li> </ul>				<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>Minimising flood risk on- and off-site</li> <li>Evaluating and preserving any remains in the Ampere Way archaeology priority area</li> <li>Not harming biodiversity in the vicinity</li> <li>Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> </ul>									
Type	Transfer																					
Waste Accepted	HCI																					
Max throughput	19,736 tpa																					
Licensed capacity	200,000 tpa																					
					<u>SUITABILITY SCORE</u> 42				<u>AVAILABILITY SCORE</u> 25		<u>VIABILITY</u> 25		<u>TOTAL SITE SCORE</u> 92									
<b>Fishers Farm Reuse &amp; Recycling Centre</b> North Downs Road, New Addington, Croydon, Surrey, CR0 0LF (2 ha)	++	+	++	+	++							+										
 <table border="1" data-bbox="44 1344 400 1501"> <tr><td>Type</td><td>Transfer (Household Waste Amenity Site)</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>6,895 tpa</td></tr> <tr><td>Licensed capacity</td><td>15,125 tpa</td></tr> </table>	Type	Transfer (Household Waste Amenity Site)	Waste Accepted	HCI	Max throughput	6,895 tpa	Licensed capacity	15,125 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>open local authority household reuse and recycling center;</li> <li>located on the edge of the residential area adjacent to farmland;</li> <li>no other waste uses nearby;</li> <li>good access from North Downs Road;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to MOL and SINC to west of site and 100m north of site;</li> <li>Not located within an Air Quality Focus Area (AQFA).</li> <li>not located within any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>Low potential for intensification.</li> </ul>				<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building;</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area;</li> <li>Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Riddlesdown;</li> <li>Ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected;</li> <li>Designing a facility that does not impact on the openness of Metropolitan Green Belt and</li> <li>Providing appropriate soft landscaping</li> </ul>									
Type	Transfer (Household Waste Amenity Site)																					
Waste Accepted	HCI																					
Max throughput	6,895 tpa																					
Licensed capacity	15,125 tpa																					
					<u>SUITABILITY SCORE</u> 28				<u>AVAILABILITY SCORE</u> 25		<u>VIABILITY</u> 25		<u>TOTAL SITE SCORE</u> 78									
<b>C7 Henry Woods Waste Management</b> Land Adj To Unit 9, Mill Lane Trading Est, Croydon CR0 4AA (0.7 ha)	++	+	++	+	+			+	+	+		+										
 <table border="1" data-bbox="44 1806 400 1942"> <tr><td>Type</td><td>Transfer + treatment</td></tr> <tr><td>Waste Accepted</td><td>HCI and C&amp;D</td></tr> <tr><td>Max throughput</td><td>12,885 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table>	Type	Transfer + treatment	Waste Accepted	HCI and C&D	Max throughput	12,885 tpa	Licensed capacity	74,999 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>open skip storage and waste sorting located within an existing strategic industrial area (SIL);</li> <li>existing residential uses located to the south and a site allocation for mixed uses lies to the east;</li> <li>access from road network from Mill Lane;</li> <li>no other safeguarded waste sites in Purley Way North;</li> <li>very constrained site;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to SINC and undesignated open space to the south of the site;</li> <li>not located within an Air Quality Focus Area (AQFA);</li> <li>not located within any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>no potential for intensification.</li> </ul>				<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building;</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads.</li> </ul>									
Type	Transfer + treatment																					
Waste Accepted	HCI and C&D																					
Max throughput	12,885 tpa																					
Licensed capacity	74,999 tpa																					
					<u>SUITABILITY SCORE</u> 42				<u>AVAILABILITY SCORE</u> 25		<u>VIABILITY</u> 25		<u>TOTAL SITE SCORE</u> 92									



SA FRAMEWORK OBJECTIVES

	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING											
	(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION								
	To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access								
<b>C8 New Era Metals,</b> 51 Imperial Way, Croydon CR0 4RR (0.37 ha)	++	++	++	+	+		+		+	+	+	+	+	?	?	?								
 <table border="1" data-bbox="44 829 415 966"> <tr><td>Type</td><td>Recycling and Reuse</td></tr> <tr><td>Waste Accepted</td><td>HCI/ Hazardous</td></tr> <tr><td>Max throughput</td><td>4,213 tpa</td></tr> <tr><td>Licensed capacity</td><td>4,999 tpa</td></tr> </table>	Type	Recycling and Reuse	Waste Accepted	HCI/ Hazardous	Max throughput	4,213 tpa	Licensed capacity	4,999 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>modern double-storey warehouse with adjacent hardstanding area for metal sorting;</li> <li>within the Imperial Way SIL which comprises a mix of new and mid-century warehouses, mostly two-storey;</li> <li>good access to the strategic road network from Imperial Way;</li> <li>two waste operators in this area: Able Waste Services and New Era Metals;</li> <li>located within Archaeological Priority Area</li> <li>located in close proximity to Croydon Panorama and MOL 300m to south east of site;</li> <li>not located within an Air Quality Focus Area (AQFA);</li> <li>not located within any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>no potential for intensification.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building;</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank;</li> <li>Not harming biodiversity in the vicinity;</li> <li>Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; and</li> <li>Providing appropriate soft landscaping.</li> </ul>							
Type	Recycling and Reuse																							
Waste Accepted	HCI/ Hazardous																							
Max throughput	4,213 tpa																							
Licensed capacity	4,999 tpa																							
	<u>SUITABILITY SCORE</u> 42				<u>AVAILABILITY SCORE</u> 25				<u>VIABILITY</u> 25				<u>TOTAL SITE SCORE</u> 92											
<b>Peartree Farm</b> Featherbed Lane, Croydon CR0 9AA (1.8 ha)	++	+	++	+	+		+		X	X	X		+	X	X									
 <table border="1" data-bbox="44 1312 415 1449"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI and C&amp;D</td></tr> <tr><td>Max throughput</td><td>59,282</td></tr> <tr><td>Licensed capacity</td><td>37,500 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	HCI and C&D	Max throughput	59,282	Licensed capacity	37,500 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>uncovered sorting facility, skip storage area along with vehicle storage and repair;</li> <li>located within the green belt surrounded by farmland;</li> <li>access from Featherbed Lane;</li> <li>no other waste uses nearby</li> <li>located within Archaeological Priority Area and Green Belt;</li> <li>not located within an Air Quality Focus Area (AQFA);</li> <li>Flood Zone 1 (low risk); and</li> <li>no potential for intensification</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>protecting the amenity of those using the nearby open spaces;</li> <li>evaluating and preserving any archaeological remains as the site is in the archaeological priority area - croydon downs;</li> <li>minimising flood risk on- and off-site;</li> <li>not harming biodiversity in the vicinity;</li> <li>ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected;</li> <li>designing a facility that does not impact on the openness of Metropolitan Green Belt; and</li> <li>providing appropriate soft landscaping</li> </ul>							
Type	Transfer																							
Waste Accepted	HCI and C&D																							
Max throughput	59,282																							
Licensed capacity	37,500 tpa																							
	<u>SUITABILITY SCORE</u> 32				<u>AVAILABILITY SCORE</u> 25				<u>VIABILITY</u> 25				<u>TOTAL SITE SCORE</u> 82											
<b>C10 Purley Oaks Reuse and Recycling Centre</b> Brighton Road, Purley, Surrey, CR8 2BG (0.22 ha)	++	+	X	X					X	X	X		+	X?	XX									
 <table border="1" data-bbox="44 1782 415 1919"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>9,099</td></tr> <tr><td>Licensed capacity</td><td>12,535</td></tr> </table>	Type	Transfer	Waste Accepted	HCI	Max throughput	9,099	Licensed capacity	12,535	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>open local authority reuse and recycling centre located within a local centre and surrounding residential neighbourhood.</li> <li>adjacent to Purley Oaks Depot;</li> <li>adjacent to a site designation for Gypsy and Traveller pitches in the Croydon Local Plan 2018;</li> <li>good access to the strategic road network from Brighton Road;</li> <li>located within Archaeological Priority Area;</li> <li>not located within an Air Quality Focus Area (AQFA);</li> <li>not located within any other environmental designation;</li> <li>Flood Zone 3 (high risk) with Flood Zone 2 (medium risk) on the periphery; and</li> <li>no potential for intensification.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>evaluating and preserving any archaeological remains in the archaeology priority area London to Brighton Roman Road</li> <li>not harming biodiversity in the vicinity;</li> <li>ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected</li> <li>providing appropriate soft landscaping</li> </ul>							
Type	Transfer																							
Waste Accepted	HCI																							
Max throughput	9,099																							
Licensed capacity	12,535																							
	<u>SUITABILITY SCORE</u> 30				<u>AVAILABILITY SCORE</u> 25				<u>VIABILITY</u> 25				<u>TOTAL SITE SCORE</u> 80											




SA FRAMEWORK OBJECTIVES																
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING				
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION	
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access	
<b>C11 Safety Kleen</b> Unit 6b, Redlands, Coulsdon, Surrey, CR5 2HT (0.28 ha)	++	++ (potentially)	++ (potentially)	++ (potentially)	++	+	+	+	+	+	x?	+	x?	x?	+	
 Type: Transfer Waste Accepted: Hazardous Max throughput: Not operational Licensed capacity: 12,782 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear;</li> <li>to the east of the site is residential housing with a buffer of green space and trees;</li> <li>good access from the road network via Redlands;</li> <li>no other waste uses nearby;</li> <li>railway lines to the west, therefore an opportunity to use rail to transport waste;</li> <li>located in close proximity to SINC 50m to east</li> <li>not located within an Air Quality Focus Area (AQFA); Archaeological Priority Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk);</li> </ul>							<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>								
						x?	xx		++			+++	x?	x?		
<b>C12 Stubbs Mead Depot</b> Factory Lane, Croydon CR0 3RL (2.71 ha)																
 Type: Vehicle depot related to HH waste collection Waste Accepted: n/a Max throughput: n/a Licensed capacity: n/a	<b>NOTES:</b> <ul style="list-style-type: none"> <li>large double-storey shed with hardstanding for vehicles;</li> <li>located within the Factory Lane industrial area and away from residential uses;</li> <li>there are a number of other waste facilities in this area;</li> <li>access via Factory Lane;</li> <li>located in close proximity to a locally listed historic park and garden to the south;</li> <li>not located within any other environmental designation;</li> <li>Flood Zone 2 (medium risk) and Flood Zone 3 (high risk). The north west corner of the site falls within FZ3 and the rest of the site is FZ2; and</li> <li>no potential for intensification (site proposed for mixed residential and employment)</li> </ul>							<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building;</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>Protecting the amenity of those using the nearby Wandle Park;</li> <li>Minimising flood risk on- and off-site;</li> <li>Evaluating and preserving any archaeological remains;</li> <li>Not harming biodiversity in the vicinity;</li> <li>Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected.</li> </ul>								
<b>C13 Solo Wood Recycling</b> Factory Lane, Croydon CR0 3RL (2.71 ha)	+	+	+	+?	+	++	x?	+	+	+	?	++	+	+	+	
 Type: Wood recycling Waste Accepted: HCI Max throughput: 5,000 tpa Licensed capacity: n/a	<b>NOTES:</b> <ul style="list-style-type: none"> <li>single-storey building and open storage;</li> <li>located within larger industrial area adjacent to a waste transfer site and a household reuse and recycling centre but away from residential neighbourhoods;</li> <li>active gas holders lie to the north-west of the site with power lines overhead;</li> <li>good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236.</li> <li>located within Flood Zone 2 (medium risk) and at high/medium risk of surface water flooding.</li> <li>not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and</li> <li>little or no potential for intensification as the site is small</li> </ul>							<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>minimising flood risk on- and off-site;</li> <li>evaluating and preserving any remains in the Ampere Way archaeology priority area;</li> <li>not harming biodiversity in the vicinity; and</li> <li>ensuring that nearby watercourses are not harmed by the development and EA buffer zones are respected.</li> </ul>								



SA FRAMEWORK OBJECTIVES

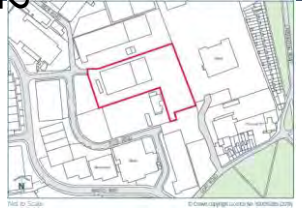

(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access



SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: KINGSTON

Site Name & Location	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)								
<b>K2 Genuine Solutions Group</b> Solutions House, Unit 1A, 223 Hook Rise South KT6 7LD (0.26 ha)	++	++	++	++				+		x?	x?	x?		+	x?	x?								
 <table border="1" data-bbox="44 840 430 997"> <tr><td>Type</td><td>Recycling &amp; Reuse</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>1,630 tpa (planning application 5,000 tpa)</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table>	Type	Recycling & Reuse	Waste Accepted	HCI	Max throughput	1,630 tpa (planning application 5,000 tpa)	Licensed capacity	74,999 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>WEEE treatment facility located within an industrial area surrounded by similar large industrial sheds;</li> <li>two-storey office block fronting on Hook Rise South beyond which is the Kingston Bypass fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear</li> <li>residential properties lie to the east and west of the industrial area; to the north of Kingston bypass is residential properties, Swallow Park Gypsy and Traveller site and to the west of this is school playing fields</li> <li>no other waste uses nearby</li> <li>access from Hook Rise South</li> <li>located within Tolworth Key Area of Change (Kingston Neighbourhood Policy SB1)</li> <li>located in close proximity to MOL to the east of Chessington SIL and green corridor to the south of the site;</li> <li>not located within any other environmental designation; and</li> <li>Flood Zone 1 (low risk)/low potential for intensification.</li> </ul>								<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts;</li> <li>protecting the amenity of those using the nearby Tolworth Recreation Ground, King George's Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club;</li> <li>evaluating and preserving any archaeological remains;</li> <li>not harming biodiversity in the vicinity; and</li> <li>providing appropriate soft landscaping.</li> </ul>							
Type	Recycling & Reuse																							
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Max throughput	1,630 tpa (planning application 5,000 tpa)																							
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									<u>SUITABILITY SCORE</u> 46		<u>AVAILABILITY SCORE</u> 25		<u>VIABILITY</u> 25		<u>TOTAL SITE SCORE</u> 96									
<b>Kingston Civic Amenity Site</b> Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (0.7 ha including Kingston WTS)	++	++	+	+	+	+	+	+	+	+	+	+	+	x?	?	?								
 <table border="1" data-bbox="44 1323 430 1459"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>14,363 tpa</td></tr> <tr><td>Licensed capacity</td><td>25,000 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	HCI	Max throughput	14,363 tpa	Licensed capacity	25,000 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>enclosed local authority reuse and recycling centre (Household Waste Amenity Site) within an industrial area;</li> <li>surrounded by open space but away from residential uses;</li> <li>on same site as Kingston Waste Transfer Centre and close to Hogsmill Sewage Treatment Works;</li> <li>adjacent to Hogsmill River but little opportunity to transport waste by water;</li> <li>access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of the Hogsmill;</li> <li>located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) &amp; Area of Archaeological Significance;</li> <li>located in close proximity to MOL, Green chain and SINC to the north and south of the site</li> <li>not located within Air Quality Focus Area (AQFA) or any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> </ul>								<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve;</li> <li>Minimising flood risk on- and off-site;</li> <li>Evaluating and preserving any archaeological remains;</li> <li>Not harming biodiversity in the vicinity;</li> <li>Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected;</li> <li>Providing appropriate soft landscaping.</li> </ul>							
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									<u>SUITABILITY SCORE</u> 38		<u>AVAILABILITY SCORE</u> 25		<u>VIABILITY</u> 25		<u>TOTAL SITE SCORE</u> 88									
<b>K4 Kingston Waste Transfer Station</b> Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (1.3 ha including Kingston RRC)	+++	+	+	+	+	+	+	+	+++	+	+	+	++	+	+	+								
 <table border="1" data-bbox="44 1785 430 1921"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>68,883 tpa</td></tr> <tr><td>Licensed capacity</td><td>200,500 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	HCI	Max throughput	68,883 tpa	Licensed capacity	200,500 tpa	<b>NOTES:</b> <ul style="list-style-type: none"> <li>Household, Commercial &amp; Industrial Waste Transfer Station located within an industrial area;</li> <li>Double-storey enclosed shed with hardstanding for vehicles;</li> <li>surrounded by open space but away from residential uses;</li> <li>on same site as Kingston RRC (Site K3) and close to Hogsmill Sewage Treatment Works;</li> <li>adjacent to Hogsmill River little opportunity to transport waste by water;</li> <li>access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of Hogsmill;</li> <li>located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) &amp; Area of Archaeological Significance;</li> <li>located in close proximity to MOL, Green chain and SINC to the north and south of the site;</li> <li>not located within Air Quality Focus Area (AQFA) or any other environmental designation;</li> <li>Flood Zone 1 (low risk).</li> </ul>								<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve;</li> <li>minimising flood risk on- and off-site;</li> <li>evaluating and preserving any archaeological remains;</li> <li>not harming biodiversity in the vicinity;</li> <li>ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected</li> <li>designing a facility that does not impact on the openness of Metropolitan Open Land; and</li> <li>providing appropriate soft landscaping.</li> </ul>							
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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access




**SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: MERTON**




Site Name & Address	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)								
<b>M1 B&amp;T@Work</b> , Unit 5c, Wandle Way, Merton CR4 4NA (0.06 ha)	+	+	++	+	+	+	+	+	++?	+	+	x?	+	+	+	+								
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>Household, Commercial &amp; Industrial Waste Transfer Station located within Willow Lane Industrial Estate;</li> <li>open area with skips.</li> <li>residential uses to the south of the site (Connect House was converted to residential use via Prior Approval);</li> <li>concentration of waste uses in Willow Lane Industrial Estate;</li> <li>road access via Wandle Way</li> <li>located within Archaeological Priority Area</li> <li>located in close proximity to areas of MOL and SINC to the east and west of Willow SIL</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>no potential for intensification</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> <li>ensuring the safety clearances for the overhead power lines crossing the site are respected.</li> </ul> <table border="1"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table>	<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	44	25	25	94																
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44	25	25	94																					
<b>M2 European Metal Recycling</b> Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX (1.03 ha)	+++	+++	+++	+++	+	+	+	+	++?	+	+	x?	+	?	+	+								
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>collection of large double-storey warehouses and office space with hardstanding for metal sorting, vehicles and skips located in Willow Lane Industrial Estate;</li> <li>residential uses to the south of the site (Connect House converted to residential use via Prior Approval);</li> <li>already a concentration of waste uses in Willow Lane Industrial Estate;</li> <li>road access via Ellis Road, suitable for large vehicles;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to areas of MOL and SINC to the east and west of Willow SIL</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The majority of the site is within Flood Zone 2; and</li> <li>low potential for intensification.</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>minimising flood risk on- and off-site;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> <li>ensuring the safety clearances for the overhead power lines crossing the site are respected.</li> </ul> <table border="1"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>38</td> <td>25</td> <td>25</td> <td>88</td> </tr> </table>	<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	38	25	25	88																
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38	25	25	88																					
<b>M3 Deadman Confidential</b> , 35 Willow Lane, Merton CR4 4NA (0.38 ha)	+	+	++	++	?	?	x?	+	+	?	?	?	++	?	x?	x?								
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>facility for sorting and baling paper for recycling located in Willow Lane Industrial Estate;</li> <li>hardstanding for material sorting, vehicles and skips together with two storey portakabin office;</li> <li>residential uses to the south of the site (Connect House converted to residential use via Prior Approval);</li> <li>already a concentration of other waste uses in Willow Lane Industrial Estate;</li> <li>access via Willow Lane;</li> <li>located within Archaeological Priority Area</li> <li>located in close proximity to areas of MOL and SINC to the east and west of Willow SIL;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 2 (medium risk); and</li> <li>low potential for intensification.</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building;</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>Minimising flood risk on- and off-site;</li> <li>Evaluating and preserving any archaeological remains;</li> <li>Providing appropriate soft landscaping.</li> </ul> <table border="1"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>38</td> <td>25</td> <td>25</td> <td>88</td> </tr> </table>	<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	38	25	25	88																
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<b>M4 Garth Road Re-use and Recycling Centres, 66-69 Amenity Way, Garth Road, Merton SM4 4AX (0.7 ha including M5)</b>																								
																								
<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>local authority reuse and recycling centre located within the Garth Road Industrial Estate;</li> <li>the site incorporate a household reuse and recycling centre and Merton Council's LACW Transfer Station;</li> <li>a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west;</li> <li>there is housing adjacent to the site at Beaver Close;</li> <li>access is gained via Garth Road, which also has houses along it;</li> <li>not located within Air Quality Focus Area (AQFA), Archaeological Priority Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>no potential for intensification.</li> </ul>																								
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Max throughput	14,594 tpa																							
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<b>M6 George Killoughery</b> 41 Willow Lane, Merton CR4 4NA	++	++	?	?	+	+	x?	+	+	+	+	?	++	?	?	?																
 <table border="1" data-bbox="44 856 409 987"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&amp;D</td></tr> <tr><td>Max throughput</td><td>71,253 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	C&D	Max throughput	71,253 tpa	Licensed capacity	74,999 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>a large site located within Willow Lane industrial estate comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste;</li> <li>concentration of waste uses within this industrial estate;</li> <li>River Wandle lies to the west of the sit but no real potential for transportation of waste by water;</li> <li>Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site</li> <li>access via Willow Lane;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow Lane SIL;</li> <li>not located within or any other environmental designation;</li> <li>Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2;</li> <li>low potential for intensification</li> </ul>				<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting residential amenity for nearby properties, especially with regard to air emissions and noise impacts;</li> <li>minimising flood risk on- and off-site;</li> <li>evaluating and preserving any archaeological remains;</li> <li>Not harming biodiversity in the vicinity;</li> <li>designing a facility that does not impact on the openness of Metropolitan Open Land;</li> <li>providing appropriate soft landscaping; and</li> <li>ensuring nearby watercourses are not harmed and there is an 8-metre buffer zone from the top of the riverbank.</li> </ul> <table border="0" data-bbox="1656 940 2789 997"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>32</td> <td>25</td> <td>25</td> <td>82</td> </tr> </table>												<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	32	25	25	82
Type	Transfer																															
Waste Accepted	C&D																															
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32	25	25	82																													
<b>M7 LMD Waste Management (Abbey Industrial Estate) Yard</b> adjacent to Unit 10 Abbey Industrial Estate, Willow Lane, Merton CR4 4NA (0.06 ha)	++	++	?	?	+	+	+	+	+	+	+	?	++	?	?	?																
 <table border="1" data-bbox="44 1360 409 1491"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&amp;D</td></tr> <tr><td>Max throughput</td><td>24,444 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	C&D	Max throughput	24,444 tpa	Licensed capacity	74,999 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>mainly open hardstanding site located within Willow Lane industrial estate surrounded by similar industrial properties;</li> <li>Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south</li> <li>there is a concentration of waste uses in Willow Lane Industrial Estate.</li> <li>access from Wandle Way;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk);</li> <li>no potential for intensification (given the small scale and lack of permission for waste use for this site).</li> </ul>				<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> </ul> <table border="0" data-bbox="1656 1302 2789 1358"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table>												<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	44	25	25	94
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44	25	25	94																													
<b>M8 LMD Waste Management Wandle Way</b> 32 Willow Lane, Merton CR4 4NA (0.07 ha)	+++	++	?	?	+	+	x?	+	+	+	+	?	++	+	?	?																
 <table border="1" data-bbox="44 1843 409 1974"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&amp;D</td></tr> <tr><td>Max throughput</td><td>38,738 tpa</td></tr> <tr><td>Licensed capacity</td><td>50,000 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	C&D	Max throughput	38,738 tpa	Licensed capacity	50,000 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>double-storey shed with attached single-storey offices located within Willow Lane industrial estate;</li> <li>Connect House, which was converted to residential use via Prior Approval, lies opposite the site;</li> <li>there is a concentration of waste uses in the Willow Lane Industrial Estate;</li> <li>access via Willow Lane;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow Lane SIL;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 2 (medium risk); and</li> <li>unsuitable for intensification due to proximity of Connect House and the throughput ratio is above average for this type of facility.</li> </ul>				<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>Minimising flood risk on- and off-site;</li> <li>Evaluating and preserving any archaeological remains; and</li> <li>Providing appropriate soft landscaping.</li> </ul> <table border="0" data-bbox="1656 1858 2789 1915"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>38</td> <td>25</td> <td>25</td> <td>88</td> </tr> </table>												<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	38	25	25	88
Type	Transfer																															
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SA FRAMEWORK OBJECTIVES																								
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M9 Maguire Skips (Wandle Way) (0.19 ha) Storage Yard Wandle Way, Merton CR4 4NB	+++	++	?	?	+	+	+	+	+	+	?	++	+	?	?									
	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>mainly open hardstanding for skips and sorting together with a double-storey covered area located within Willow Lane industrial estate;</li> <li>Connect House, converted to residential use via Prior Approval, lies opposite the site;</li> <li>there is a concentration of waste uses in the Willow Lane Industrial Estate. This facility lies near residential properties and has been the subject of noise and planning enforcement investigations;</li> <li>access via Wandle Way;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow SIL;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (medium risk); and</li> <li>unsuitable for intensification since the throughput ratio is above average for this type of facility</li> </ul>						<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> </ul>						<table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>34</td> <td>25</td> <td>25</td> <td>84</td> </tr> </table>				<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	34	25	25	84
<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>																					
34	25	25	84																					
M10 Powerday (Weir Court) (0.3 ha) Weir Court, Merton SW19 8UG	+++	++	?	?	+	+	+	+	+	+	?	++	+	?	?									
	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>enclosed double-storey shed with outside hardstanding space located within Durnsford Road SIL;</li> <li>Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site;</li> <li>three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and Reston Waste Transfer and Recovery.</li> <li>Access via Weir Road to strategic road network;</li> <li>although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks;</li> <li>located within Archaeological Priority Area</li> <li>located in close proximity to River Wandle (SINC, Green Corridor, Open Space &amp; MOL)</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and</li> <li>low potential for intensification (throughput per hectare is good for this type of facility).</li> </ul>						<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>evaluating and preserving any archaeological remains;</li> <li>not harming biodiversity in the vicinity;</li> <li>ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected;</li> <li>designing a facility that does not impact on the openness of metropolitan open land;</li> <li>providing appropriate soft landscaping; and</li> <li>ensuring the safety clearances for the overhead power lines crossing the site are respected.</li> </ul>						<table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>42</td> <td>25</td> <td>25</td> <td>92</td> </tr> </table>				<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	42	25	25	92
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42	25	25	92																					
M11 Morden Transfer Station (0.8 ha) Amenity Way, Merton SM4 4AX	+++	++	?	?	+	+	+	+	+	+	?	++	+	?	?									
	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>double-storey industrial shed with hardstanding;</li> <li>there is a number of waste uses in this area, including Merton Reuse and Recycling Centre.</li> <li>site is adjacent to residential properties in Beaver Close;</li> <li>access from Amenity Way</li> <li>located in close proximity to Green Corridor and a SINC on the north-western boundary. Cemetery designated MOL;</li> <li>not located within an Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>low potential for intensification</li> </ul>						<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>protecting the amenity of those using the adjacent cemetery;</li> <li>not harming biodiversity in the vicinity;</li> <li>designing a facility that does not impact on the openness of Metropolitan Open Land; and</li> <li>providing appropriate soft landscaping.</li> </ul>						<table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>34</td> <td>25</td> <td>25</td> <td>84</td> </tr> </table>				<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	34	25	25	84
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<b>M12 NJB Recycling (0.35 ha)</b> 77 Weir Road, Merton SW19 8UG	+++	++	?	?	+	+	+	+	+	+	+	?	++	+	?	?																
 <table border="1" data-bbox="44 829 430 961"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&amp;D</td></tr> <tr><td>Max throughput</td><td>48,687 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	C&D	Max throughput	48,687 tpa	Licensed capacity	75,000 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>enclosed two and three-storey sheds and warehouses for vehicles located within Durnsford Road SIL;</li> <li>Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site. The site is also adjacent to a Gypsy and Travellers site in LB Wandsworth;</li> <li>there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery;</li> <li>access via Weir Road to strategic road network;</li> <li>although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks;</li> <li>located within Archaeological Priority Area</li> <li>located in close proximity to River Wandle (SINC, Green Corridor, Open Space &amp; MOL)</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk);</li> <li>low potential for intensification (throughput per hectare is good for this type of facility).</li> </ul>				<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>minimising flood risk on- and off-site;</li> <li>protecting the residential amenity for nearby properties e.g. air emissions and noise impacts;</li> <li>protecting the amenity of those using the future Wandle Valley Regional Park;</li> <li>evaluating and preserving any archaeological remains;</li> <li>not harming biodiversity in the vicinity;</li> <li>ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development;</li> <li>designing a facility that does not impact on the openness of metropolitan open land;</li> <li>providing appropriate soft landscaping.</li> </ul> <table border="0" data-bbox="1656 997 2804 1050"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table>												<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	36	25	25	86
Type	Transfer																															
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36	25	25	86																													
<b>M13 One Waste Clearance</b> Plot 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA (0.1 ha)	+++	++	++	+	+	+	+	+	+	+	+	?	++	+	?	?																
 <table border="1" data-bbox="44 1365 430 1497"> <tr><td>Type</td><td>Transfer+ recycling</td></tr> <tr><td>Waste Accepted</td><td>HCI and CD&amp;E</td></tr> <tr><td>Max throughput</td><td>20,000 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table>	Type	Transfer+ recycling	Waste Accepted	HCI and CD&E	Max throughput	20,000 tpa	Licensed capacity	75,000 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>waste transfer station (fully enclosed unit) within Abbey Industrial Estate which forms part of Willow Lane SIL;</li> <li>surrounded by other businesses on the industrial estate including waste management facilities, vehicle repairers and manufacturing industries;</li> <li>Connect House, converted to residential use via Prior Approval, lies to the south of the site;</li> <li>access from Wandle Way via a purpose-built access and driveway onto the industrial estate;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to areas of MOL and SINC which lie to the east and west;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk); and</li> <li>low potential for intensification since throughput per hectare is good (based on the few weeks facility in operation).</li> </ul>				<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> </ul> <table border="0" data-bbox="1656 1354 2804 1407"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table>												<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	44	25	25	94
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44	25	25	94																													
<b>M14 Reston Waste Transfer and Recovery Unit 6, Weir Road, Merton SW19 8UG (0.28 ha)</b>	+++	++	?	?	+	+	+	+	+	+	+	?	++	+	?	?																
 <table border="1" data-bbox="44 1774 430 1906"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&amp;D</td></tr> <tr><td>Max throughput</td><td>71,595 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	C&D	Max throughput	71,595 tpa	Licensed capacity	74,999 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>enclosed three-storey shed and warehouses with outside hardstanding space for vehicles located within Durnsford Road SIL;</li> <li>Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site;</li> <li>there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery;</li> <li>access via Weir Road to strategic road network;</li> <li>although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to River Wandle (SINC, Green Corridor, Open Space &amp; MOL)</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and</li> <li>low potential for intensification (throughput per hectare is good for this type of facility).</li> </ul>				<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts</li> <li>evaluating and preserving any archaeological remains</li> <li>not harming biodiversity in the vicinity</li> <li>ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development</li> <li>designing a facility that does not impact on the openness of Metropolitan Open Land; and</li> <li>providing appropriate soft landscaping.</li> </ul> <table border="0" data-bbox="1656 1900 2804 1953"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table>												<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	36	25	25	86
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SA FRAMEWORK OBJECTIVES

(A)SUSTAINABLE WASTE MANAGEMENT (B) CLIMATE CHANGE (C) ENVIRONMENTAL QUALITY (D) COMMUNITY WELL-BEING

(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINBLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRON-MENTAL PROTECTION	(12) BIODIVER-SITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites and waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access

M15 Riverside AD Facility  
43 Willow Lane, Merton CR4 4NA (0.87 ha)

+++	+++	+++	+++	++	+	+	++	+	+	+	?	++	+	+	+
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Type	Management (AD)
Waste Accepted	Mixed garden & kitchen waste
Max throughput	36,341 tpa
Licensed capacity	99,999 tpa

**NOTES**

- Anaerobic Digestion (AD) facility which takes mixed garden and kitchen waste;;
- the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane);
- comprised of double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste;
- concentration of waste uses within this industrial estate;
- the River Wandle is located adjacent but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site
- vehicle access to the site is provided via an existing route running along the northwest boundary;
- located within Archaeological Priority Area;
- located in close proximity to land designated as MOL, Open Space, a Green Corridor and a SINC which lie to the east and west of Willow Lane SIL. A Conservation Area is located to the north east of the site;
- not located within an Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2.
- low potential for intensification (since the throughput per hectare is good for this type of facility).


**RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED**

- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- evaluating and preserving any archaeological remains;
- not harming biodiversity in the vicinity;
- ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development;
- designing a facility that does not impact on the openness of Metropolitan Open Land; and
- providing appropriate soft landscaping.

<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>
32	25	25	82

M16 Riverside Bio Waste Treatment Centre  
43 Willow Lane, Merton CR4 4NA (0.87 ha)

+++	+++	+++	+++	++	+	+	++	+	+	+	?	++	+	+	+
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Type	Composting
Waste Accepted	HCI
Max throughput	51,715 tpa
Licensed capacity	100,000 tpa

**NOTES**

- enclosed in-vessel composting facility which takes mixed garden and kitchen waste
- the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane);
- there is already concentration of waste uses within this industrial estate;
- the River Wandle is located adjacent but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site;
- vehicle access to the site is provided via an existing route running along the northwest boundary;
- located within Archaeological Priority Area;
- close to MOL, Open Space, a Green Corridor and SINC which lie to the east and west of Willow Lane SIL.
- not located within an Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2; and
- low potential for intensification (since the throughput per hectare is good for this type of facility);

**RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED**

- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- minimising flood risk on- and off-site;
- evaluating and preserving any archaeological remains;
- not harming biodiversity in the vicinity;
- ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development;
- designing a facility that does not impact on the openness of Metropolitan Open Land; and
- providing appropriate soft landscaping.

<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>
32	25	25	82

M17 UK and European (Ranns)  
Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA (0.5 ha)

+++	+++	+++	+++	++	+	+	++	+	+	+	?	++	+	+	+
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Type	Treatment to produce soil
Waste Accepted	C&D
Max throughput	804 tpa
Licensed capacity	75,000 tpa

**NOTES:**




- a large site comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste located within the Willow Lane industrial estate;
- concentration of waste uses within this industrial estate;
- River Wandle lies to the west of the sit but no real potential for transportation of waste by water;
- Connect House, converted to residential use via Prior Approval, lies to the north east of the site
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk);
- low potential for intensification.

**RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED**

- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- minimising flood risk on- and off-site
- evaluating and preserving any archaeological remains
- providing appropriate soft landscaping.



<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>
38	25	25	88






SA FRAMEWORK OBJECTIVES																				
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING								
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION					
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access					
<b>M18 Wandle Waste Management, Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA (0.07 ha)</b>	+	+	X	X	?	?	+	?	?	?	?	+	?	X?	?					
	<b>NOTES:</b> <ul style="list-style-type: none"> <li>double-storey shed located within the Willow Lane industrial estate;</li> <li>there is a concentration of waste uses within this industrial estate;</li> <li>Connect House, converted to residential use via Prior Approval, lies to the north east of the site</li> <li>River Wandle lies to the west of the sit but no real potential for transportation of waste by water;</li> <li>access via Willow Lane;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>Flood Zone 1 (low risk);</li> <li>unlikely to be potential for intensification. The throughput on this site is very small and it is not clear what operation takes place on the site as no permission seems to exist for a hazardous waste transfer facility for this site.</li> </ul>				<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building.</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site.</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank; and</li> <li>providing appropriate soft landscaping and regard to the adjacent Roundshaw Park.</li> </ul>				<table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table>				<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	44	25	25	94
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44	25	25	94																	
<b>SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: SUTTON</b>																				
<b>777 Recycling Centre, 154a Beddington Lane CR0 4TE (0.97 ha)</b>	+++	+++	+++	+++ (potentially)	++	+	+	++	X?	X?	+	?	+++	+	+	+				
	<b>NOTES:</b> <ul style="list-style-type: none"> <li>large double-height and triple-height modern industrial sheds and hardstanding for skip storage in Beddington SIL;</li> <li>there is a concentration of waste uses in Beddington SIL. Also located nearby are the Beddington Farmlands EFW facility, the Croydon Transfer Station and a concrete batching operation at 154 Beddington Lane;</li> <li>the site backs onto tram lines to the rear;</li> <li>HGV access from Coomber Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>located close to Wandle Valley Regional Park and MOL to the west of Beddington Lane;</li> <li>not located within Air Quality Focus Area or within any other environmental designations;</li> <li>Flood Zone 1 (low flood risk); and</li> <li>no potential for intensification.</li> </ul>				<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>evaluating and preserving any archaeological remains;</li> <li>providing appropriate soft landscaping;</li> <li>ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.</li> </ul>				<table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>42</td> <td>25</td> <td>25</td> <td>92</td> </tr> </table>				<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	42	25	25	92
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42	25	25	92																	
<b>S2 Beddington Farmlands ERF Energy Recovery Facility (ERF) Beddington Waste Management Facility, 105 Beddington Lane CR0 4TD (5.4 ha)</b>	+++	+++	+++	+++	+++	+	+	++	+	?	+	?	+++	+	+	+				
	<b>NOTES:</b> <ul style="list-style-type: none"> <li>large energy recovery facility (ERF) located within the boundaries of the Wandle Valley Regional Park, adjacent to Viridor Recycling Facility and Beddington Farm landfill site;</li> <li>concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL;</li> <li>access from Beddington Lane and the vehicle routing to the site is through Beddington SIL. There is traffic congestion in nearby Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within MOL, Metropolitan Green Chain, SINC, Wandle Valley Regional Park and in Archaeological Priority Area;</li> <li>not located within Air Quality Focus Area;</li> <li>Low flood risk (Flood Zone 1);</li> <li>no potential for intensification. This is a new facility and therefore no opportunities to upgrade or intensify.</li> </ul>				<b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts</li> <li>protecting the amenity of those using the future Wandle Valley Regional Park</li> <li>evaluating and preserving any archaeological remains</li> <li>not harming biodiversity in the vicinity</li> <li>ensuring nearby watercourses are not harmed by the development;</li> <li>designing a facility that does not impact on the openness of MOL;</li> <li>providing appropriate soft landscaping; and</li> <li>ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.</li> </ul>				<table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>34</td> <td>25</td> <td>25</td> <td>84</td> </tr> </table>				<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	34	25	25	84
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SA FRAMEWORK OBJECTIVES

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	To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access																
<b>S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TG (0.2 ha)</b>	+	+	+	+?	+?	+?	+	++	x?	x?	+	+?	+	+?	+?	+?																
 <table border="1" data-bbox="44 829 430 955"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>Hazardous</td></tr> <tr><td>Max throughput</td><td>9,601</td></tr> <tr><td>Licensed capacity</td><td>75,000</td></tr> </table>	Type	Transfer	Waste Accepted	Hazardous	Max throughput	9,601	Licensed capacity	75,000	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>modern double-height industrial units incorporating office space located on the Beddington Lane industrial estate at the northern end of the Beddington SIL;</li> <li>there is concentration of waste uses in the Beddington SIL and at the Beddington Waste Management Facility (105 Beddington Lane);</li> <li>access is from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>located close to MOL, Metropolitan Green Chain, SINC and Wandle Valley Regional Park on the west side of Beddington Lane;</li> <li>not located within Air Quality Focus Area;</li> <li>Low flood risk (Flood Zone 1);</li> <li>low potential for intensification.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts;</li> <li>protecting the amenity of those using the future Wandle Valley Regional Park;</li> <li>evaluating and preserving any archaeological remains;</li> <li>not harming biodiversity in the vicinity; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.</li> </ul> <table border="0" data-bbox="1632 903 2819 966"> <tr> <td style="text-align: center;"><u>SUITABILITY SCORE</u></td> <td style="text-align: center;"><u>AVAILABILITY SCORE</u></td> <td style="text-align: center;"><u>VIABILITY</u></td> <td style="text-align: center;"><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td style="text-align: center;">42</td> <td style="text-align: center;">25</td> <td style="text-align: center;">25</td> <td style="text-align: center;">92</td> </tr> </table>								<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	42	25	25	92
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42	25	25	92																													
<b>S4 Croydon Transfer Station Endeavour Way, Beddington Farm Road, Sutton CR0 4TD (0.74 ha)</b>	++	++ (potentially)	++ (potentially)	+++ (potentially)	+	+?	+	++	x?	x?	+	+?	+	+?	+?	+?																
 <table border="1" data-bbox="44 1270 430 1396"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>27,799 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table>	Type	Transfer	Waste Accepted	HCI	Max throughput	27,799 tpa	Licensed capacity	75,000 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site lies in Beddington SIL and consists of double- and triple-height enclosed sheds with hardstanding for vehicles;</li> <li>There is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods;</li> <li>Access from Endeavour Way There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>not located within Air Quality Focus Area;</li> <li>low flood risk (Flood Zone 1); and</li> <li>some potential for intensification since the site is operating below the average throughput for this type of facility.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>Designing the site so that operations are carried out within a fully enclosed building;</li> <li>Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>Evaluating and preserving any archaeological remains;</li> <li>Providing appropriate soft landscaping; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.</li> </ul> <table border="0" data-bbox="1632 1291 2819 1354"> <tr> <td style="text-align: center;"><u>SUITABILITY SCORE</u></td> <td style="text-align: center;"><u>AVAILABILITY SCORE</u></td> <td style="text-align: center;"><u>VIABILITY</u></td> <td style="text-align: center;"><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td style="text-align: center;">42</td> <td style="text-align: center;">25</td> <td style="text-align: center;">25</td> <td style="text-align: center;">92</td> </tr> </table>								<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	42	25	25	92
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<b>S5 Hinton Skips Land to the rear of 112 Beddington Lane, Sutton CR0 4YZ</b>	++	++ (potentially)	++ (potentially)	+++ (potentially)	+	+?	+	++	x?	x?	+	+?	+	+?	+?	+?																
 <table border="1" data-bbox="44 1711 430 1858"> <tr><td>Type</td><td>Transfer + treatment of skip waste</td></tr> <tr><td>Waste Accepted</td><td>C&amp;D</td></tr> <tr><td>Max throughput</td><td>8,000 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table>	Type	Transfer + treatment of skip waste	Waste Accepted	C&D	Max throughput	8,000 tpa	Licensed capacity	75,000 tpa	<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site lies within Beddington SIL and consists of an enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles;</li> <li>there is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods;</li> <li>the site does not have direct frontage onto the Beddington Lane being set back some 400m from the highway at the end of a made up access way that also provides access to a number of other businesses. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>located in close proximity to Archaeological Priority Area Scheduled monument 80m to the west</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>medium flood risk (Flood Zone 2); and</li> <li>some potential for intensification since the estimated throughput is lower than the average throughput for this type of facility and the planning permission states that up to 50,000 tonnes will be managed on the site.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>developers planning to intensify the safeguarded site should pay particular attention to:</li> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>minimising flood risk on- and off-site;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping;</li> <li>ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.</li> </ul> <table border="0" data-bbox="1632 1816 2819 1879"> <tr> <td style="text-align: center;"><u>SUITABILITY SCORE</u></td> <td style="text-align: center;"><u>AVAILABILITY SCORE</u></td> <td style="text-align: center;"><u>VIABILITY</u></td> <td style="text-align: center;"><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td style="text-align: center;">40</td> <td style="text-align: center;">25</td> <td style="text-align: center;">25</td> <td style="text-align: center;">90</td> </tr> </table>								<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	40	25	25	90
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<b>S6 Hydro Cleansing, Hill House, Beddington Farm Road CR0 4XB</b>																								
++	++	++	+?	+	+?	+?	++	x?	x?	+	+	++	+	+	+									
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site lies within Beddington SIL adjacent to the Surrey Jaguar Centre and the Royal Mail Centre and consists of a two-storey 1960s office block with facility to rear</li> <li>there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas;</li> <li>access from Beddington Farm Road. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>low flood risk (Flood Zone 1); and</li> <li>low potential for intensification since the throughput is typical for this type of facility.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> </ul> <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table>									<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	44	25	25	94
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<b>S7 Kimpton Park Way Civic Amenity Site Kimpton Park Way SM3 9QH (0.44ha)</b>																								
++	++	++	++	+	+?	+	+	+?	+?	+?	+?	++	+	+?	+?									
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>open local authority reuse and recycling centre located in the north-west of the Kimpton SIL;</li> <li>access from the road network via Kimpton Park Way and Minden Road;</li> <li>located close to Kimpton Linear Park, which is designated as green chain, MOL and SINC;</li> <li>not located within Archaeological Priority Area;</li> <li>not located within Air Quality Focus Area or any other environmental designations;</li> <li>good access to strategic road network;</li> <li>low flood risk (Flood Zone 1); and</li> <li>some potential for intensification.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts</li> <li>protecting the amenity of those using the nearby Kimpton Linear Park</li> <li>designing a facility that does not impact on the openness of Metropolitan Open Land; and</li> <li>providing appropriate soft landscaping; and</li> <li>ensuring the nearby underground electricity cable is neither damaged nor made inaccessible.</li> </ul> <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table>									<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	44	25	25	94
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<b>S8 King Concrete 124 Beddington Lane CR0 4YZ (0.6 ha)</b>																								
+++ (potentially)	+++ (potentially)	++ (potentially)	++ (potentially)	+?	+?	+	+	x?	x?	+	+	++	+	+?	+?									
 <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site lies within Beddington SIL and consists of an open site for concrete production and aggregates recovery;</li> <li>there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas;</li> <li>access from Beddington Lane and also nearby in Beddington Waste Management Facility, 105 Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>potential for intensification since this site is managing well under the average throughput for this type of facility. The permission states that the facility will recycle 20,000 tpa of CD&amp;E waste on site.</li> </ul>								<p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>developers planning to intensify the safeguarded site should pay particular attention to:</li> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>evaluating and preserving any archaeological remains</li> <li>providing appropriate soft landscaping;</li> <li>ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic</li> </ul> <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>30</td> <td>25</td> <td>25</td> <td>80</td> </tr> </table>									<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	30	25	25	80
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<p><b>S9 Premier Skip Hire</b> Unit 12, Sandiford Road, SM3 9RD (0.1 ha)</p> <p>++ ++ + + + +? + + +? +? + +? +? +? +?</p>																
<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>a two-storey office and warehouse building with hardstanding for skip storage located within the Kimpton SIL;</li> <li>the site is near to Kimpton household recycling and reuse centre (Site S7 above);</li> <li>the closest residential properties are 75-100m to the south and west of the site on Hamilton Avenue</li> <li>good road access to Sandiford Road via Kimpton Road;</li> <li>located close to SINC (Pyl Brook) to south and west;</li> <li>not located within Archaeological Priority Area; Air Quality Focus Area or any other environmental designations;</li> <li>low flood risk (Flood Zone 1); and</li> <li>low potential for intensification</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and</li> <li>providing appropriate soft landscaping.</li> </ul> <p><u>SUITABILITY SCORE</u> 46      <u>AVAILABILITY SCORE</u> 25      <u>VIABILITY</u> 25      <u>TOTAL SITE SCORE</u> 96</p>																
<p><b>S10 Raven Recycling</b> Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR (0.25 ha)</p> <p>+++ + +? ? +? +? +? +? +? +? +? +? +? +? +? +?</p>																
<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site lies within Beddington SIL and consists of double-height enclosed sheds with hardstanding for skips;</li> <li>there is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane which are mostly located away from residential areas;</li> <li>access from Endeavour Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>low flood risk (Flood Zone 1); and</li> <li>low potential for intensification the throughput per hectare is average for this type of facility.</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building.</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and</li> <li>providing appropriate soft landscaping.</li> </ul> <p><u>SUITABILITY SCORE</u> 42      <u>AVAILABILITY SCORE</u> 25      <u>VIABILITY</u> 25      <u>TOTAL SITE SCORE</u> 92</p>																
<p><b>S11 TGM Environmental</b> 112 Beddington Lane, Sutton CR0 4TD</p> <p>+ + +? ? ? +? x? +? ? ? +? ? + ? ? ? ?</p>																
<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site occupies the land at the front of 112 Beddington Lane within Beddington SIL and consists of waste paper and waste cardboard recovery and transfer facility comprising a weigh bridge, portacabin offices, parking and areas for sorting and baling (bulking for onward reprocessing of paper and plastic);</li> <li>Viridor EfW and Beddington Sewage Treatment Works lie to the west. A Wickes DIY &amp; Trade supplies store is located immediately to the north of the application site, and CPI Group a printing and publishing company are located in an industrial unit immediately to the south;</li> <li>there is a concentration of waste uses in Beddington SIL mostly located away from residential areas. However the closest residential uses are around 40m to the west on the opposite side of Beddington Lane in Harrington Close;</li> <li>access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area and in close proximity to a Scheduled monument 80m to the west;</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>medium flood risk (Flood Zone 2); and</li> <li>low potential for intensification. The operation has been relocated from 156 Beddington Lane and the additional space enables baling on site which did not take place on the previous site. The throughput is average</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;</li> <li>minimising flood risk on- and off-site;</li> <li>evaluating and preserving any archaeological remains; and</li> <li>providing appropriate soft landscaping.</li> </ul> <p><u>SUITABILITY SCORE</u> 40      <u>AVAILABILITY SCORE</u> 25      <u>VIABILITY</u> 25      <u>TOTAL SITE SCORE</u> 90</p>																

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SA FRAMEWORK OBJECTIVES																								
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING												
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) HISTORIC TOWNSCAPE & AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION									
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve access									
<b>S12 Country Waste Skip Hire</b> 79-85 Beddington Lane, Sutton CR0 4 <sup>TH</sup> (2.8 ha)																								
++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+								
<p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>the site is currently vacant but the newly permitted development is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring;</li> <li>there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas;</li> <li>access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;</li> <li>located within Archaeological Priority Area;</li> <li>located adjacent to MOL, Metropolitan Green Chain SINC and Wandle Valley Regional Park</li> <li>not located within Air Quality Focus Area or any other environmental designation;</li> <li>low flood risk (Flood Zone 1); and</li> <li>no potential for intensification. The site has only recently been granted planning permission so no increase in the volumes of waste managed is likely to take place</li> </ul> <p><b>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</b></p> <ul style="list-style-type: none"> <li>designing the site so that operations are carried out within a fully enclosed building;</li> <li>ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;</li> <li>protecting the residential amenity of nearby properties especially with regard to air emissions and noise impacts</li> <li>protecting the amenity of those using the future Wandle Valley Regional Park;</li> <li>evaluating and preserving any archaeological remains</li> <li>not harming biodiversity in the vicinity</li> <li>ensuring nearby watercourses are not harmed by the development</li> <li>designing a facility that does not impact on the openness of Metropolitan Open Land; and</li> <li>ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and</li> <li>the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.</li> </ul>																								
<table border="0" style="width:100%; text-align:center;"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table>																	<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>	36	25	25	86
<u>SUITABILITY SCORE</u>	<u>AVAILABILITY SCORE</u>	<u>VIABILITY</u>	<u>TOTAL SITE SCORE</u>																					
36	25	25	86																					



Type	Treatment with transfer
Waste Accepted	HCI + C&D
Max throughput	Not published yet
Licensed cap.	350,000 tpa

## 13. Conclusions

**13.1** This SA Report assesses the extent to which the draft South London Waste Plan (SLWP) Submission Version, when compared to reasonable alternatives, will help to deliver the environmental, economic and social objectives of sustainable development while achieving self-sufficiency in the management of South London's future waste arisings over the plan period from 2021-36. It has been published to inform public consultation on the draft SLWP prior to submission to the Government between 4 September and 22 October in accordance with Regulation 19 of the Town and Country Planning Act (Local Planning) Regulations 2012 (Regulation 19 consultation).

**13.2** The report has been prepared in line with best practice and meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in government planning practice guidance and the SEA regulations respectively. Accordingly, it provides a comprehensive review of current and future projected waste arisings within the plan area over the next 15 years; existing waste management sites, throughput and capacity; the new London Plan apportionment targets for the management of household and commercial & industrial (C&I) waste; the national, sub-regional and local policy context; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the proposed policies and waste sites on the sustainability objectives making up the SA Framework.

**13.3** It is soundly based upon the best available local evidence for each of the four boroughs and draws upon the initial analysis of site throughput, capacity and environmental constraints set out in the South London Technical Paper prepared by Anthesis consultants in June 2019, subsequent detailed site appraisal work undertaken by the four boroughs in order to assess site suitability, availability and viability, updated information from site operators and consultation responses.

**13.4** The report builds upon the SA Scoping Report published in September 2019 and the previous SA Report on the SLWP Issues and Preferred Options document published in October 2019. As part of the appraisal process, the SA Framework has been refined to take account of comments from the Environment Agency, Natural England and Historic England

**13.5** The draft SLWP Submission Version now sets out an amended Vision and revised plan objectives for the management of South London's waste over the next 15 years which better reflect the following 10 strategic and development management policies.

### Strategic Policies

- **WP1 Strategic Approach to Household and Commercial and Industrial Waste:**
- **WP2 Strategic Approach to Other Forms of Waste:** This policy has been amended to reflect the move from a shortfall in C&D waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of Surrey County Council (see Representation C18/144) amongst other South East councils.

### Development Management Policies

- **WP3 Existing Waste Sites** (unchanged);
- **WP4 Sites for Compensatory Provision** (unchanged);
- **WP5 Protecting and Enhancing Amenity** (unchanged);
- **WP6 Sustainable Design and Construction of Waste Facilities:** This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that,



where appropriate, the sustainability credentials of a waste development can be measured against the BRE's 'CEQUAAL'<sup>1</sup> scheme in place of the BREAAAM New Construction scheme;

- **WP7 The Benefits of Waste** (unchanged);
- **WP8 New Development Affecting Waste Sites:** This is a new policy to reflect the requests from SUEZ (see Representation C20/10) and Veolia (see Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy:
- **WP9 Planning Obligations** (unchanged);
- **WP10 Monitoring and Contingencies:** This is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies

**13.6** The SA Matrix in Section 12 demonstrates that proposed Policies WP1-WP10 for inclusion in the new SLWP 2021-36 (Option 1), are likely to have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

**13.7** While Option 1 essentially carries forward the same overall strategic approach which was identified and assessed as the 'preferred option' in the previous SA Report on Issues and Preferred Options, the SA Matrix demonstrates that the two newly introduced policies (WP8 'Strategic Approach to Other Forms of Waste' and WP10 'Monitoring and Contingencies') and the changes made to Policies WP2 'Strategic Approach to Other Forms of Waste' and WP6 'Sustainable Design and Construction of Waste Facilities' will significantly improve the plan by making a greater contribution to sustainability objectives. Amongst other things, this outcome reflects the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036.

**13.8** Overall, the most important sustainability benefits of the draft SLWP Submission Version include:

- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;

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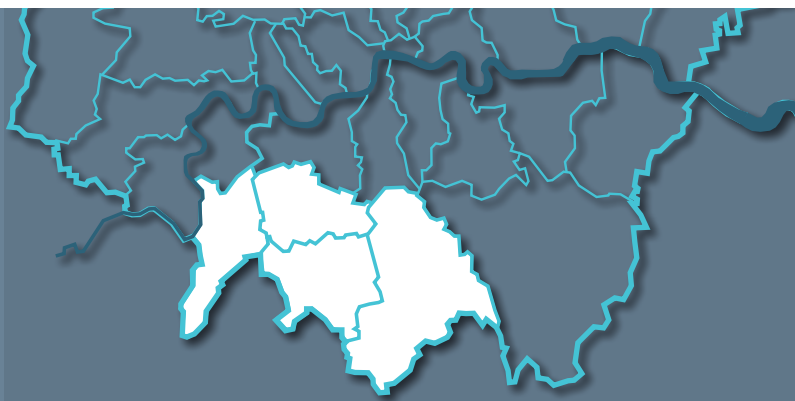
<sup>1</sup> the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at <https://www.ceequal.com/>

- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
- 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; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery** towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

**13.9** Stakeholder feedback on both the draft plan and this SA Report arising from the Regulation 19 consultation stage will inform the preparation of the final SLWP for submission to the government. The final version of the SA Report, together with the outcome of Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) screening will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.



- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



Sustainability Appraisal (SA) Appendices  
incorporating Strategic Environmental Assessment (SEA)  
on Draft for Submission to Government

September 2020





# Appendix 1

## EQUALITIES IMPACT ASSESSMENT (EqIA)

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

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# 1. Background

## Introduction

**1.1** This Equalities Impact Assessment (EqIA) report assesses the impacts of each of the proposed waste policies included in the draft South London Waste Plan (SLWP) Submission Version on the key equality target groups within the four partner boroughs. It has been published alongside the Sustainability Appraisal (SA) Report to inform public consultation on the draft SLWP between 4 September and 22 October prior to the formal submission of the plan to the Secretary of State for Housing, Communities and Local Government (DHCLG) for Examination-in-Public.

**1.2** As with the SA Report, the impacts of the proposed SLWP Submission Version (Option 1) have been assessed alongside the following strategic alternatives:

- **Option 1: Proposed Plan (Meet Apportionment<sup>73</sup>)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP Submission Version;
- **Option 2: Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged; and
- **Option 3 ‘Do-Nothing’ scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

**1.3** Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and SWP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036:

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged.
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the current SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

**1.4** In considering the impacts of Option 1 (Proposed Plan), the potential benefits of the newly introduced policies (WP8 and WP10) and the changes made to Policies WP2 and WP6 on equalities target groups have also been assessed in relation to the draft policies put forward at the issues and preferred options stage.

**1.5** While in many respects, the proposed SLWP Policies WP1-WP10 (Option 1) carry forward and build upon the preferred policies in the Issues and Preferred Options document, there are number of differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation.

**1.6** This report updates the previous EqIA Report on SLWP Issues and Preferred Options published for public consultation between 31 October and 22 December 2019.

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<sup>73</sup> Policy SI 8 of the ‘Intend to Publish’ London Plan (December 2019) sets out new borough apportionment targets for the management of household and commercial & industrial (C&I) waste over the period of the London Plan to 2041. Based on this trajectory, the amount of household and C&I waste which needs to be managed within the four South London boroughs in 2036 is 929,750 tonmnes per annum SA Report on South London Waste Plan Submission Version: Appendices (September 2020)

## What is an EqIA?

**1.7** An EqIA is defined by the Equality and Human Rights Commission<sup>74</sup> as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making.

**1.8** EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including joint development plan documents) from April 2011, local authorities still have a legal duty to “give due regard” to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying.

**1.9** When applied to planning policy documents such as the SLWP, the first stage of EqIA involves screening to identify the potentially beneficial and adverse impacts of emerging policies and proposals on each of the specific equality target groups and to identify any gaps in knowledge. Then - where any potentially significant adverse effects are identified and/or if the potential impact is not intended and/or illegal - a full stage 2 assessment should be carried out. This should focus on the significant negative impacts and identify possible mitigation measures. Consultation with stakeholders and members of equality target groups should be undertaken during this phase.

**1.10** This document constitutes the full stage 2 assessment.

## Legislation

**1.11** The requirement to consider the impacts of policies and strategies upon certain equality target groups through EqIA process arises from the following legislation.

### Race Relations (Amendment) Act 2000

**1.12** This amendment required local authorities to be pro-active in promoting racial equality by undertaking a Race Equality Impact Assessment of their strategies and plans.

### Disability Discrimination (Amendment) Act 2005

**1.13** The Act required local authorities to promote equality of opportunity for disabled people by ensuring that their policies, practices, procedures and services do not discriminate against them.

### Equality Act 2006

**1.14** The Act established the Commission for Equality and Human Rights (CEHR) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC).

### Gender Equality Duty 2007 (as required by the Equality Act 2006)

**1.15** This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their

<sup>74</sup> see <http://www.equalityhumanrights.com>

existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

### Equality Act 2010

**1.16** The Equality Act 2010 brought together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act simplifies, strengthens and harmonises the previously existing legislation in order to protect individuals from unfair treatment and promotes a fair and more equal society. The main pieces of legislation that have merged are:

- Sex Discrimination Act 1975;
- Race Relations Act 1976;
- Disability Discrimination Act 1995;
- Employment Equality (Religion or Belief) Regulations 2003;
- Employment Equality (Age) Regulations 2006;
- Equality Act 2006, Part 2; and
- Equality Act (Sexual Orientation) Regulations 2007.

**1.17** Section 149 of the Act introduces a 'general duty' on all public sector bodies to have regard to the following considerations in the exercise of their functions:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

**1.18** In seeking to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic', public bodies should have regard to:

- removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

**1.19** The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.



## LB Croydon Equality Policy 2016-2020

1.20 Croydon's Equality Policy 2016-20 and the supporting Opportunity and Fairness Plan sets out the following aims and objectives.

### Aims

The council acknowledges its statutory equality duty as a Public Sector employer under s149 of the Equality Act 2010. In particular, whilst we exercise our functions we aim to

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

### Objectives

#### Employment

- to increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.

#### Child poverty

- to reduce the rate of child poverty especially in the six most deprived wards.

#### Attainment

- to improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards.

#### Community safety

- to increase the percentage of domestic violence sanctions;
- to increase the reporting and detection of the child sexual offences monitored; and
- to reduce the number of young people who enter the youth justice system.

#### Social isolation

- to reduce social isolation amongst disabled people and older people.

#### Community cohesion

- to improve the proportion of people from different backgrounds who get on well together.

#### Health

- to reduce differences in life expectancy between communities.

## RB Kingston Equality & Community Cohesion Strategy 2016-2020

1.21 Kingston's Equality and Community Cohesion Strategy 2016-20 sets out the following aims. .

### Aim

As one of the largest employers and service providers in the area, the Royal Borough of Kingston is committed to eliminating discrimination in all its forms and working to a cohesive community that respects differences and values human rights. We will work to challenge discrimination against age, ethnicity, gender, transgender people, disabled people, individuals who practise a religion and those who do not have any religious beliefs or practice other beliefs, people with specific sexual preference and people across all levels of economic status. We recognise that some individuals suffer from multiple discrimination and we will work together with our partners to alleviate this.

### Objectives

#### Knowing our community

- to appreciate the changing nature of the population of the borough;
- to better understand who lives in the borough and be aware of their needs;
- to improve on how to gather, use and share the information appropriately.

#### Place Shaping, leadership, partnership and organisational commitment

- to provide strong leadership and ensure equality, diversity and community cohesion are embedded throughout the council by politicians and senior management;
- to engage and influence our partners to work together to achieve the equality objectives by setting clear equality priorities that support each other;
- to ensure that the procured services meet our equality obligations;
- to take responsibility for the delivery of equality and community cohesion work and to manage and monitor its performance more effectively; and
- to continue to improve on the equality impact assessment process and setting of targets

#### **Community engagement and satisfaction:**

- to improve the involvement and engagement of the diverse communities within the borough;
- to ensure the communities feel their views are taken into account and to provide feedback;
- to challenge negative views and promote more cohesive communities;
- to make communities feel secure and safe in our diverse society.

#### **Responsive services and customer care:**

- to ensure that everyone entitled to services is able to access them;
- to make our service provision fair, equitable, transparent and consistent;
- to understand the impact changes can have on the lives of service users, their family and carers;
- to improve our communication and accessibility for all services users;
- to encourage feedback, compliments as well as complaints, and respond to them;
- to regularly monitor equality and cohesion objectives at departmental management meetings
- to carry out equality monitoring of our service users and analyse the data; and
- to act on any adverse trends that are identified

#### **A modern and diverse workforce:**

- to have employment policies and practices that are fair, flexible and address equality issues;
- to ensure that employees feel supported at work and that their experiences are positive;
- to strive for a workforce that represents the community it serves;
- to provide all employees with opportunities to engage in training and learning;
- to make sure that every employee understands and engages in the council's equality duties ;
- to carry out equality monitoring and encourage more self-declaration on all equality strands.

## LB Merton Equality and Community Cohesion Policy 2017-2021

1.22 Croydon's Equality Policy 2016-20 and the supporting Opportunity and Fairness Plan sets out the following aims and objectives.

### Aims

The aims of the Equality and Community Cohesion Strategy 2017-21 are to:

- bridge the gap between the levels of deprivation and prosperity in the borough;
- improve understanding of the borough's diversity and foster better understanding between communities;
- improve understanding of 'hidden' disabilities and the challenges that disabled residents face in all aspects of their lives. We aim to work in a cross-cutting way and take a holistic approach to more effectively address the needs of disabled residents;
- support those who do not usually get involved in decision-making to better understand how they can get involved and get their voices heard;
- support residents to access on-line access services;
- provide services that meet the needs of a changing population
- employ staff that reflect the borough's diversity.

### Equality objectives

1. To ensure key plans and strategies narrow the gap between different communities in the borough;
2. To Improve equality of access to services for disadvantaged groups;
3. Ensure regeneration plans increase the opportunity for all Merton's residents to fulfil their educational, health and economic potential, participate in the renewal of the borough and create a health promoting environment;
4. Encourage recruitment from all sections of the community , actively promote staff development and career progression opportunities and embed equalities across the organisation;
5. Promoting a safe, healthy and cohesive borough where communities get on well together
6. Fulfil our statutory duties and ensure protected groups are effectively engaged when we change our services.

## LB Sutton's Equality & Diversity Framework 2019-20 to 2023-24

**1.23** Sutton's Equality and Diversity Framework sets out the Council's commitment and approach to eliminating unlawful discrimination, harassment and victimization, advancing equality of opportunity, and fostering good relations within the borough Sutton from 2019-20 to 2023-24.

**1.24** It sets out the following Core Objectives:

### **Objective 1**

Encourage tolerance, mutual understanding and respect between all community members and interest groups, including people with a disability, newly-arrived migrants, asylum seekers and refugees, gypsies and travellers, people of different ethnicities and race, people of different faiths, gender identity and sexual orientation.

### **Objective 2**

Target and challenge social isolation, particularly that experienced by people with a disability, Black Asian and Minority Ethnic (BAME) individuals, and older people at risk of isolation or with long-term conditions.

### **Objective 3**

Strengthen the Council's approach to engaging with residents and community groups so that they feel they have a say in the services the Council delivers, particularly people with a disability and faith and BAME groups. This includes maximising the use of existing Council mechanisms, such as borough consultations, Local Committees and external ones such as the Fairness Commission.

### **Objective 4**

Empower equality and diversity organisations, the voluntary sector, local businesses and residents by monitoring and publishing equality and diversity information and outcomes so that they can understand the reasons for Council decisions and challenge any decisions that they believe are unjustified.





## 2. Equalities Target Groups in South London

### Equalities target groups

2.1 Table 2.1 identifies the range of equality target groups considered as part of this EqIA report.

**Table 2.1: Equalities Target Groups**

Equality Target Group	Equality Target Strand
Women	Gender
Black and minority ethnic (BME) people	Race
Older people	Age
Young people and children	Age
Disabled people	Disability
Lesbians, gays, bisexuals and transgendered	Sexuality
Different faith groups	Faith
People affected by social deprivation	Social Deprivation

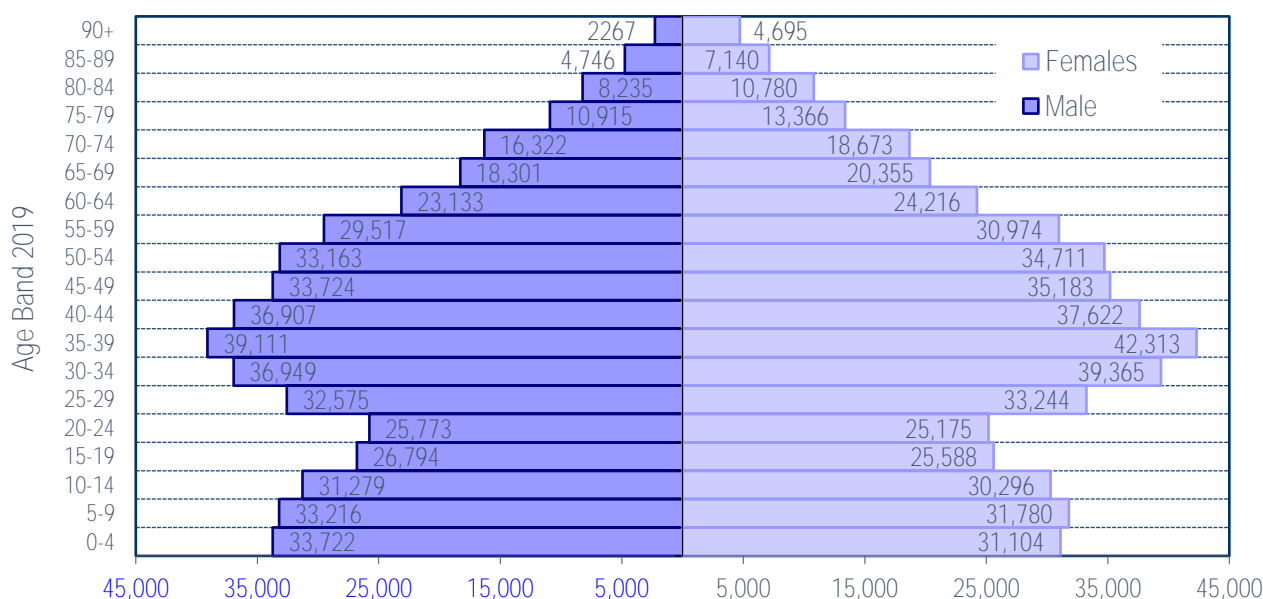
### Women, older people, young people and children

**Table 2.2: Population structure for SLWP boroughs and plan area 2019**

Resident Population 2019				
	Age band	Males	Females	All persons
Croydon	Borough residents aged 0-15	42,104 (22.6%)	40,478 (20.5%)	<b>82,582 (21.5%)</b>
	Borough residents aged 16-64	120,450 (64.6%)	127,654 (64.7%)	<b>248,104 (64.6%)</b>
	Borough residents aged 65+	23,865 (12.8%)	29,287 (14.8%)	<b>53,152 (13.9%)</b>
	<b>Total</b>	<b>186,419</b>	<b>197,419</b>	<b>383,838</b>
Kingston	Borough residents aged 0-15	16,801 (19.4%)	16,488 (18.6%)	<b>33,289 (19%)</b>
	Borough residents aged 16-64	58,605 (67.8%)	58,416 (66%)	<b>117,021 (66.9%)</b>
	Borough residents aged 65+	11,099 (12.8%)	13,571 (15.4%)	<b>24,670 (14.1%)</b>
	<b>Total</b>	<b>86,505</b>	<b>88,475</b>	<b>174,980</b>
Merton	Borough residents aged 0-15	23,074 (23.8%)	21,844 (20.5%)	<b>44,918 (22.1%)</b>
	Borough residents aged 16-64	62,029 (64.1%)	70,046 (65.8%)	<b>132,075 (65%)</b>
	Borough residents aged 65+	11,739 (12.1%)	14,595 (13.7%)	<b>26,334 (12.9%)</b>
	<b>Total</b>	<b>96,842</b>	<b>106,485</b>	<b>203,327</b>
Sutton	Borough residents aged 0-15	21,983 (22%)	20,688 (19.7%)	<b>42,671 (20.8%)</b>
	Borough residents aged 16-64	63,817 (63.9%)	66,668 (63.6%)	<b>130,485 (63.7%)</b>
	Borough residents aged 65+	14,084 (14.1%)	17,535 (16.7%)	<b>31,619 (15.5%)</b>
	<b>Total</b>	<b>99,884</b>	<b>104,891</b>	<b>204,775</b>
SLWP area	Residents aged 0-15	103,962 (22.2%)	99,498 (20%)	<b>203,460 (21%)</b>
	Residents aged 16-64	304,901 (64.9%)	322,784 (65%)	<b>627,685 (65%)</b>
	Residents aged 65+	60,787 (12.9%)	74,988 (15%)	<b>135,775 (14%)</b>
	<b>Total</b>	<b>469,650</b>	<b>497,270</b>	<b>966,920</b>

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 2.1: Population structure by gender and age band for the plan area 2019



Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

## Disabled people

Table 2.3: Incapacity benefit claimants for SLWP boroughs and plan area 2019

	Numbers	Percentage aged 16-64
Croydon	280	0.11%
Kingston	80	0.07%
Merton	110	0.08%
Sutton	120	0.09%
<b>SLWP</b>	<b>590</b>	<b>0.09%</b>
London	6,980	0.12%

Source: Incapacity Benefit or Severe Disablement allowance claimants (DWP, 2019)

## Black and minority ethnic (BME) people

Table 2.4: Ethnic breakdown for SLWP boroughs and plan area 2019

	White	Black and Minority Ethnic (BAME)	Asian or Mixed Race	Black or Mixed Race	Other	Chinese
Croydon	188,737 (47.6%)	207,812 (52.4%)	76,805 (19.4%)	109,216 (27.5%)	16,762 (4.2%)	5,029 (1.3%)
Kingston	121,925 (67.5%)	58,673 (32.5%)	36,758 (20.4%)	8,292 (4.6%)	9,520 (5.3%)	4,104 (2.3%)
Merton	133,098 (63.2%)	77,354 (36.8%)	42,749 (20.3%)	24,124 (11.5%)	7,561 (3.6%)	2,920 (1.4%)
Sutton	153,461 (73.2%)	56,206 (26.8%)	31,975 (15.3%)	15,833 (7.6%)	5,686 (2.7%)	2,711 (1.3%)
<b>SLWP</b>	<b>597,221 (59.9%)</b>	<b>400,045 (40.1%)</b>	<b>188,287 (18.9%)</b>	<b>157,465 (15.8%)</b>	<b>39,529 (4.0%)</b>	<b>14,764 (1.5%)</b>
London	5,161,532 (56.7%)	3,944,624 (43.3%)	1,819,907 (20.0%)	1,442,062 (15.8%)	526,430 (5.8%)	156,224 (1.7%)

Source: GLA Housing-led Ethnic Projections (November 2017)

## Faith groups

Table 2.5: Religion for SLWP boroughs and plan area 2019

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion
Croydon	49.3%	-	5.5%	-	8.8%	-	2.8%	33.6%
Kingston	41.9%	1.3%	6.1%	-	11.0%	-	2.2%	37.6%
Merton	51.7%	-	5.3%	-	6.1%	-	3.5%	33.3%
Sutton	48.8%	-	8.2%	-	7.3%	-	2.1%	33.6%
<b>SLWP</b>	<b>48.4%</b>	<b>0.2%</b>	<b>6.2%</b>	<b>0.0%</b>	<b>8.3%</b>	<b>0.0%</b>	<b>2.7%</b>	<b>34.3%</b>
London	44.5%	0.9%	5.2%	2.2%	14.2%	1.4%	2.3%	29.4%

Source: GLA Data store – Annual Population Survey (June 2019)

## Social deprivation

Table 2.6: Index of Multiple Deprivation (IMD 2019) - national ranking and change since 2015

	Social deprivation ranking compared to the 317 areas in England <sup>75</sup>		
	IMD 2015 <sup>76</sup>	IMD 2019	Change 2015-19
Croydon	95 <sup>th</sup>	108 <sup>th</sup> most deprived in England	↓
Kingston	270 <sup>th</sup>	273 <sup>rd</sup> most deprived in England	↓
Merton	209 <sup>th</sup>	213 <sup>th</sup> most deprived in England	↓
Sutton	211 <sup>th</sup>	226 <sup>th</sup> most deprived in England	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 2.7: Index of Multiple Deprivation (IMD 2019) - London ranking and change since 2015

	Social deprivation ranking compared to the 33 London Boroughs		
	IMD 2015	IMD 2019	Change 2015-19
Croydon	17 <sup>th</sup>	15 <sup>th</sup> most deprived in London	↑
Kingston	32 <sup>nd</sup>	32 <sup>nd</sup> most deprived in London	No change
Merton	28 <sup>th</sup>	29 <sup>th</sup> most deprived in London	↓
Sutton	29 <sup>th</sup>	31 <sup>st</sup> most deprived in London	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 2.8: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England

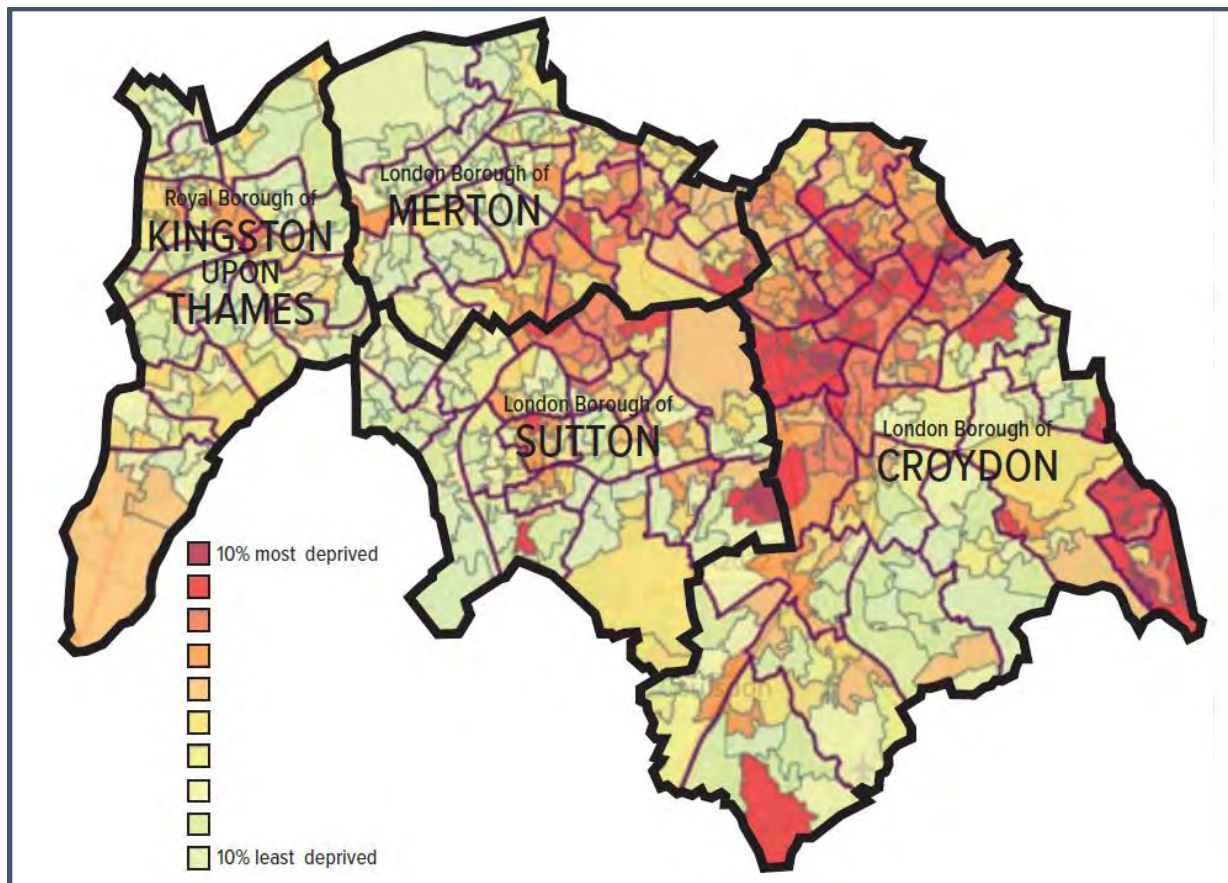
	IMD 2019 – Ranking of average score			
	LSOAs ranked in 10% most deprived	LSOAs ranked in 20% most deprived	LSOAs ranked in 10% least deprived	LSOAs ranked in 20% least deprived
Croydon	5	44	7	19
Kingston	0	1	13	38
Merton	0	3	22	41
Sutton	1	7	23	42

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

<sup>75</sup> based on IMD 2019 'rank of average score' (1<sup>st</sup> = most deprived and 317<sup>th</sup> = least deprived)

<sup>76</sup> 2015 data recast to 2019 lower tier (district) authorities following boundary changes

Figure 2.2: Index of Multiple Deprivation (IMD 2015) map for SLWP area<sup>77</sup>



<sup>77</sup> showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)

## 3. Equalities Impact Assessment

### EqIA criteria

3.1 Table 3.1 sets out the EqIA criteria as the basis for assessing the potential impacts of emerging South London Waste Plan (SLWP) policies upon each equality target group.

**Table 3.1 EqIA criteria**

EqIA Criteria
<i>Will the policy or proposal have beneficial or adverse impacts for women?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for black and minority ethnic (BAME) groups or faith groups?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for older people?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for young people and children?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for disabled people and people with a limiting long-term illness?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for lesbians, gays, bisexuals and/or transgendered people (LGTB groups)?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for people affected by social deprivation?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for gypsies and/or travellers?</i>

### EqIA Matrix and Scoring system

3.2 The outcome off EqIA Screening in relation to each of the proposed waste policies WP1-WP10 set out in the draft SLWP Submission Version are presented in the Screening Matrix below. As before, the extent of the likely beneficial or adverse impacts on each target equality group is recorded in the matrix using the symbols shown in Table 4.2.

**Table 4.2: Scoring system for use in EqIA screening**

Symbol	Scale of effect
<b>++</b>	Larger beneficial impact
<b>+</b>	Smaller beneficial impact
<b>-</b>	Neutral or no impact
<b>X</b>	Smaller negative impact
<b>XX</b>	Large negative effect.
<b>?</b>	Uncertain impact and/or the nature and magnitude of the impact is subject to the implementation of other planning policies.





**EqIA MATRIX: IMPACTS OF PROPOSED SOUTH LONDON WASTE PLAN POLICIES ON EQUALITY GROUPS**

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP1: STRATEGIC APPROACH TO HOUSING AND COMMERCIAL AND INDUSTRIAL WASTE (unchanged)</b>								
<b>OPTION 1: PROPOSED POLICY WP1 - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT)</b>								
(a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.								
(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.								
(c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).								
(d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).								
	+	+	++	++	++	+	+	++
<b>OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT)</b>								
Carry forward Policy WP1 from existing SLWP 2012	?	?	+ ?	+ ?	+ ?	?	+ ?	+ ?
<b>OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)</b>								
	X	X	XX	XX	XX	X	XX	XX
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policy WP1 to expire in 2021								
	X	X	XX	XX	XX	X	XX	XX
Proposed Policy WP1 will have beneficial impacts on <b>older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation</b> by: <ul style="list-style-type: none"> <li>minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or 'broad locations' in South London over the plan period;</li> <li>minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality;</li> <li>safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses;</li> <li>ensuring that waste facilities are fully adapted to climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS</li> </ul> Older people, young people, disabled people and people with a limiting long term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts. There will be less significant benefits for <b>Women; BME/Faith groups; LGTB people and Gypsies &amp; Travellers</b> and these will be broadly in line with those experienced by the wider community.								
<b>POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE (amended)</b>								
<b>OPTION 1: PROPOSED POLICY WP2 - SAFEGUARD EXISTING SITES ONLY</b>								
(a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.								
(b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 420,275 tpa [to] 2036. The boroughs of the SLWP will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (Policy WP3).								
(c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5.								
(d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.								
(e) ... improvements to the operation of and the enhancement of the environment of the Hogsmill and the Beddington STW will be supported,								
	+	++	++	++	++	+	++	++
<b>OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS</b> Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.								
	+ ?	+ ?	+ ?	+	+	+ ?	+	+
<b>OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES</b>								
Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.	+ ?	+ ?	+ ?	+	+	+ ?	+	+
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Existing Policy WP2 expires in 2021								
	X	XX	XX	XX	XX	X	XX	XX
Proposed Policy WP2 will have significant beneficial impacts (++) for <b>older people; young people and children; disabled people; and people with a limiting long-term illness</b> by: <ul style="list-style-type: none"> <li>ensuring that any new sites for C&amp;D waste are for compensatory provision only, thus helping to minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues that would otherwise arise from additional HGV movements;</li> <li>not supporting the development of new sites (either transfer or management) for radioactive waste, agricultural waste and hazardous waste;</li> <li>ensuring that additional C&amp;D waste capacity can only be delivered through the intensification of existing sites and ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed. Enhancing the environment of the Hogsmill Sewage Treatment Works and the Beddington STWs</li> </ul> Older people, young people and children, disabled people and people with a limiting long term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements to and from waste sites. The most significant effects include air pollution and associated health impacts (e.g. asthma and respiratory disease) resulting from elevated levels of nitrogen dioxide (NO2) and particulates (PM10 and PM2.5) particularly in the vicinity of major roads, residential areas, schools and Air Quality Focus Areas. These groups are also disproportionately affected by a number of impacts potentially arising from the construction and operation of waste sites, particularly within smaller, more constrained employment locations where there are residential areas and other vulnerable land-uses nearby. For these reasons, avoiding new C&D sites is appraised to have significant beneficial effects								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP3: EXISTING WASTE SITES (unchanged)</b>								
<b>OPTION 1: PROPOSED POLICY WP3</b>								
<u>Safeguarding</u> (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.								
<u>Intensification</u> (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.								
<u>Safeguarding Compensatory Provision</u> (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.	+?	+?	+ +?	+ +?	+ +?	+?	+?	+ +?
(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.								
<u>Safeguarding Waste Hierarchy</u> (e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to same level in hierarchy as prior to development.								
<b>OPTION 2: EXISTING PLAN</b> Carry forward Policies WP3 & WP4 from SLWP 2012.	?	?	+ ?	+ ?	+?	?	?	+ ?
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policies WP3 and WP4 to expire	?	?	X	X	X	?	?	X
<p>Proposed Policy WP3 on <b>Existing Waste Sites</b> would have beneficial impacts for <b>older people; young people and children; disabled people; and people with a limiting long-term illness</b> by:</p> <ul style="list-style-type: none"> <li>safeguarding existing waste sites within South London for waste uses only, thus avoiding the need for new sites to be developed unless this is for compensatory provision. As discussed above under Policies WP1 and WP2, this will help to minimise local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues that would otherwise arise from additional HGV movements and the construction and operation of new sites in less suitable locations;</li> <li>protecting the quality of the environment, particularly for vulnerable receptors, by avoiding the adverse impacts of noise, vibration, dust, soil contamination, odour and water pollution during both the construction and operational phases that would otherwise arise from the development of new waste management sites. It should be noted that any adverse effects arising from an existing operational waste site should have already been mitigated to acceptable levels through a construction management plan, planning conditions and via the waste permitting regime.</li> <li>ensuring that any development on an existing safeguarded site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.;</li> <li>minimising the potentially adverse effects on human health and quality of life, particularly within areas affected by social deprivation, by minimising the adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues, that would otherwise arise from the development of new waste management sites within south London, either to exceed the apportionment for South London and/or to compensate for any loss of capacity outside the plan area. The current or future effects of each existing safeguarded waste site on equalities target groups will naturally vary depending on the particular circumstances of each site and are therefore subject to a degree of uncertainty (?). Key issues include access to and from the strategic road network, the future potential for intensification or upgrading the site, the presence of vulnerable neighbouring land uses, site constraints and the extent to which the site is compliant with planning conditions or environmental permitting..</li> </ul>								

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	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP4: SITES FOR COMPENSATORY PROVISION (unchanged)</b>								
<b>OPTION 1: PROPOSED POLICY WP4</b> Proposals for new waste sites to provide compensatory provision should: (a) Demonstrate that the site is capable of providing suff. compensatory capacity. (b) Be located on sites: (i) within SILs or Locally Significant Industrial Location; (ii) not having an adverse effect on nature conservation areas protected by international or national regulations; (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted in FZss 3a or 3b. (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area (d) Have particular regard to sites which: (i) do not result in visually detrimental development conspicuous from strategic open land (e.g. Green Belt or MOL); (ii) are located more than 100 metres from open space; (iii) are located outside Groundwater Source Protection Zones (i.e. farthest from protected groundwater sources) (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk (v) have direct access to the SRN; (vi) have no Public Rights of Way crossing the site; (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character archaeological sites and strategic views; or (viii) offer opportunities to accommodate various related facilities on a single site.	+	+	+ +	+ +	+ +	+	+	+ +?
<b>OPTION 2: EXISTING PLAN</b> Carry forward Policy WP5 in existing SLWP	+?	+ ?	+ +?	+ +?	+ +?	+ ?	+ ?	+?
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Existing Policy WP5 expires in 2021	x?	x?	xx	xx	xx	x?	x?	xx?
Proposed Policy WP4 on <b>Sites for compensatory provision</b> would have beneficial impacts for <b>women, older people; young people; disabled; and people with a limiting long-term illness</b> by: <ul style="list-style-type: none"> <li>updating criteria to mitigate the potentially adverse impacts of waste sites which have been proposed for compensatory provision, thereby minimising disproportionate impacts upon certain equalities target groups. These include not permitting hazardous waste facilities within Flood Zones 3a or 3b; avoiding adverse effects on on-site or off-site flood risk and favouring sites which are located more than 100 metres from open space; located outside Groundwater Source Protection Zones; have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water: provide easy access for staff to cycle or walk; have direct access to the strategic road network; and have no Public Rights of Way crossing the site; and</li> <li>giving consideration to the potentially negative cumulative effects of a concentration of waste uses in one area and balancing these against the advantages of co-location</li> </ul> Proposed Policy WP4 will have less significant beneficial effects on <b>Women; BME/Faith groups; LGTB and Gypsies and Travellers</b> broadly in line with those experienced by the wider community.								

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	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP5: PROTECTING AND ENHANCING AMENITY (unchanged)</b>								
<b>OPTION 1: PROPOSED POLICY WP5</b>								
(a) Developments for compensatory/intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment. (b) The parts of a [site] where unloading, loading, storage and processing takes place should be in a fully enclosed covered building. (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected; (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas (iv) Groundwater, surface water and watercourses (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated (vi) Noise and vibration from the plant and traffic generated (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials (viii) The safety and security of the site (ix) Odour, litter, vermin and birds; and, (x) The design of the facility, particularly <ul style="list-style-type: none"> <li>• complementing or improving the character of an area;</li> <li>• limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;</li> <li>• being of a scale, massing or height appropriate to the townscape or landscape;</li> <li>• using good quality materials;</li> <li>• minimising the requirement for exterior lighting; and,</li> <li>• utilising high-quality boundary treatments</li> </ul>	+	+	++	++	++	+	+	++?
<b>OPTION 2: EXISTING PLAN</b> Carry forward Policy WP7 in existing SLWP 2012								
	+?	+?	+?	+?	+?	+?	+?	+?
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policy WP7 to expires in 2021								
	x?	x?	xx	xx	xx	x?	x?	x
<p>Proposed Policy WP5 on <b>Protecting &amp; Enhancing Amenity</b> would have beneficial impacts for older people; young people; disabled people; people illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> <li>• ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building.</li> <li>• requiring that planning applications are accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. All of these measures will help to mitigate potential impacts that would otherwise have disproportionate impacts upon the above equalities target groups.</li> <li>• since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way will also be beneficial</li> </ul> <p>Proposed Policy WP4 will have less significant benefits for <b>Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers</b> in line with those experienced by the wider community</p>								

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	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES (amended)</b>								
<b>OPTION 1: PROPOSED POLICY WP6</b>								
(a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies of the relevant borough's Development Plan.								
(b) Waste facilities will be required to:								
(i) minimise on-site carbon dioxide emissions in line with 2020 London Plan Policy SI2;								
(ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/ heatwaves, air pollution, drought conditions and impacts on biodiversity;	++	+	++	++	++	+	+	++?
(iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with 2020 London Plan Policy G5;								
(iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;								
(v) minimise waste and promote sustainable management of construction waste on site; and,								
(vi) protect, manage and enhance local habitats and biodiversity								
<b>OPTION 2: EXISTING PLAN</b>								
Carry forward Policy WP6 from existing SLWP 2012	+	+	+	+	+	+	+	+
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b>								
Allow existing Policy WP6 to expire in 2021	XX	X?	XX	XX	XX	X?	X?	XX
<p>Proposed Policy WP6 on <b>Sustainable design and construction</b> would have beneficial impacts for older people; women, young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> <li>requiring all waste developments to achieve BREEAM 'Excellent', to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures in order to manage risk both to and from the development over its planned lifetime;</li> <li>incorporating best practice sustainable design and construction measures in line with BREEAM 'Excellent' aimed at promoting inclusive environments and reducing crime, fear of crime and anti-social behaviour, thus having particular benefits in terms of women, young people and children and older people</li> <li>further reducing disproportionate impacts on certain equalities target groups by helping to minimise air pollution, making more efficient use of resources and reducing the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement</li> <li>ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5;</li> <li>requiring all new or upgraded waste facilities to be fully adapted and resilient to the future impacts of climate change including flooding, summer heatwaves, contribution to the urban heat island (UHI) effect and drought. It is well established that climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as the young, the elderly and people suffering from respiratory diseases</li> <li>avoiding negative environmental impacts (e.g noise, air pollution, health impacts, community severance, amenity and quality of life) associated with waste management practices towards the bottom of the waste hierarchy (e.g. landfill and incineration) and associated transport movements which might disproportionately affect areas of social deprivation, thus having particular benefits for BME people, certain faith groups, disabled people, older people and young people and children.</li> </ul> <p>Proposed Policy WP6 will have less significant beneficial effects on <b>BME/Faith groups; Lesbians, gays, bisexuals and transgender (LGBTB) and Gypsies and Travellers</b> and these are expected to be broadly in line with those experienced by the wider community.</p>								

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	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP7: THE BENEFITS OF WASTE (unchanged)</b>								
<b>OPTION 1: PROPOSED PLAN - POLICY WP7</b>								
(a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.	++	+	++	++	++	+	+	++?
(b) Waste development for additional Energy from Waste facilities will not be supported								
(c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.								
<b>OPTION 2: EXISTING PLAN</b> Carry forward Policy WP8 from existing SLWP 2012.	+	+	+	+	+	+	+	+
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Allow existing Policy WP8 to expire in 2021.	X	?	X	X	X	?	?	X
<p>Proposed Policy WP7 would have beneficial impacts for <b>older people; women, young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation</b> by:</p> <ul style="list-style-type: none"> <li>requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas;</li> <li>minimising air pollution and associated impacts on human health, particularly amongst the young, the elderly, people with respiratory problems and within areas affected by social deprivation, by (i) ensuring that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); and (ii) not supporting the development of additional Energy from Waste (EfW) facilities</li> <li>ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)</li> <li>supporting waste minimization and thus avoiding the potential negative environmental impacts (e.g noise, air pollution, health impacts, community severance, amenity and quality of life) associated with waste management facilities and HGV movements which might disproportionately affect equalities target groups</li> </ul> <p>Draft Policy WP6 will have less significant beneficial effects on <b>BME/Faith groups; LGT) and Gypsies &amp; Travellers</b> broadly in line with those experienced by the wider community</p>								
<b>POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES (new policy)</b>								
<b>OPTION 1: PROPOSED POLICY WP8</b>								
(a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.	+?	+?	+	+	+	+?	+?	+
(b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, the applicant should:								
(i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision. (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations.								
<b>OPTION 2: EXISTING PLAN</b> Not applicable.	n/a							
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b> Do not include NEW POLICY W8 in draft SLWP for submission.	?	?	X	X	X	?	?	X
<p>Newly proposed <b>Policy WP8 on 'New development affecting waste sites'</b> is considered have some potentially beneficial impacts for older people; young people; disabled people; people with a long-term illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> <li>ensuring that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and on vulnerable groups. Since the potential adverse impacts of waste operations and associated HGV movements, including air pollution, dust, noise, water pollution, surface water run-odd, light pollution and impacts on the local road network are likely to have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within socially deprived areas areas, this new policy is expected to have a positive impact on the corresponding equalities appraisal criteria.</li> <li>ensuring that appropriate mitigation measures are implemented as part of the design and layout of newly proposed 'sensitive' developments in the vicinity of operational waste sites from the earliest stages of project planning and design and as part of the ongoing and future management of the site (secured through planning conditions and obligations)</li> </ul> <p>However, proposed Policy WP8 is considered to have less significant benefits specifically for <b>Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers</b> (i.e. in line with those experienced by the wider community)</p>								

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	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<b>POLICY WP9: PLANNING OBLIGATIONS (unchanged – formerly Preferred Policy WP8)</b>								
<b>OPTION 1: PREFERRED POLICY</b>								
Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.	+	+	+	+	+	+	+	+
<b>OPTION 2: EXISTING PLAN</b>								
Carry forward Policy WP8 from SLWP 2012.	+	+	+	+	+	+	+	+
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b>								
Allow existing Policy WP8 of existing SLWP 2012 to expire in 2021.	?	?	?	?	?	?	?	?
Proposed Policy WP9 on <b>Planning Obligations</b> would have beneficial impacts for promoting <b>equalities, accessibility and social inclusion</b> within south London by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities. By minimising the adverse impacts of vehicles routing on the local road network, traffic management measures delivered through planning obligations will have potential benefits for most equalities target groups, in particular young people and children, disabled people and the elderly by steering HGV movements away from local and residential roads.								
<b>POLICY WP10: MONITORING AND CONTINGENCIES (new policy)</b>								
<b>OPTION 1: PROPOSED POLICY WP10</b>								
The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.	+	+	++	++	++	+	+	++
<b>OPTION 2: EXISTING PLAN</b>								
Not applicable.	n/a							
<b>OPTION 3: 'DO-NOTHING' SCENARIO</b>								
Do not include NEW POLICY W10 in draft SLWP for submission.	X	X	XX	XX	XX	X	X	XX
Newly proposed Policy WP10 is considered to have potentially beneficial impacts for most equalities target groups within South London by ensuring that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on an annual basis and by ensuring that consultation will take place between the partner boroughs to determine whether any of the contingency actions listed in Appendix 1 of the draft SLWP need to be taken. The ongoing monitoring and review of the following indicators and the partner Boroughs' stated commitment to take contingency action where necessary will therefore help ensure that the various beneficial impacts identified above in this EqIA matrix for waste Policies WP1 to WP9 can be delivered:								
<ul style="list-style-type: none"> <li>Indicator 1: Household and Commercial waste managed;</li> <li>Indicator 2: Construction and Demolition Waste Managed (for Policy WP2);</li> <li>Indicator 3: Radioactive, Agricultural and Hazardous Waste Treated (for Policy WP2);</li> <li>Indicator 4: Existing Waste Sites Safeguarded (for Policy WP3 &amp; WP4);</li> <li>Indicator 5: Compensatory or Intensified Sites with Fully Enclosed Covered Building (possible introduction of design guidance) (for Policy WP5b);</li> <li>Indicator 6 Development on Green Belt, Metropolitan Open Land and Open Space (for Policy WP5c);</li> <li>Indicator 7: Development on Nationally, Regionally or Locally Designated Nature Conservation Areas (for Policy WP5(c))</li> <li>Indicator 8: Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas (for Policy WP5c);</li> <li>Indicator 9: Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)(for Policy WP5c); and</li> <li>Indicator 10: Development Achieving BREEAM and/or CEEQUAL 'Excellent' Rating(for Policy WP6); and</li> <li>Indicator 11: Development involving Energy from Waste (for Policy WP7).</li> </ul>								

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## 4. Conclusions

### EqIA Findings

**4.1** The outcome of EqIA set out in this report show that the proposed policies included in the draft SLWP Proposed Submission document are expected to have a number of beneficial impacts on all target equality groups identified for the purposes of this assessment and are not generally expected to lead to adverse discriminatory impacts upon any particular equalities target group.

**4.2** In the absence of appropriate planning policies and environmental controls aimed at (a) avoiding the need for additional waste facilities to be constructed in unsuitable locations, for example by maximising the efficient operation and throughput of existing waste sites and driving waste management practices further up the waste hierarchy; and (b) mitigating the potentially adverse environmental impacts arising from the construction and operation of compensatory or upgraded waste facilities and associated HGV movements for example by enclosing potentially polluting operations such as skip transfer, it is well established that older people, young people and children, disabled people (including people with a limiting long term illness) and people affected by social deprivation are likely to be disproportionately affected. For waste sites in close proximity to residential areas and other vulnerable land-uses, the most significant adverse effects include increased levels of air pollution in the form of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM10/PM2.5), associated health impacts (e.g. respiratory disease), dust, noise/disturbance, community severance and road safety issues. Certain equalities target groups are more strongly represented within those parts of the plan area affected by higher levels of social deprivation, which in turn tend to be in closer proximity to existing waste management facilities and industrial locations

**4.3** In addition, where appropriate policy measures are not taken to address both the causes of climate change by reducing CO<sub>2</sub> emissions from waste operations and associated HGV movements) and to ensure that all proposed waste facilities are fully adapted to the impacts of climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS, these groups are also likely to be disproportionately affected.

**4.4** Overall, the EqIA matrix shows that the proposed approach to the management of future waste arisings in South London set out in the draft SLWP (**Option 1**), is considered to have positive impacts on most equalities target groups by comparison with both **Option 2: Existing Plan (Exceed Apportionment)** and **Option 3 "Do-Nothing" scenario**. More specifically, the appraisal indicates that proposed Policies WP1-WP10 are likely to have particular benefits for **older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation** by:

- minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or 'broad locations' in South London over the plan period;
- minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality;
- safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses
- ensuring that waste facilities are fully adapted to climate change including summer heatwaves,



- urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS.
- providing a greater degree of certainty about the nature and extent of planned waste related developments would serve to reassure local communities and equalities target groups in particular over what to expect. There are therefore be particular benefits for BME people, certain faith groups, older people and young people, who are more likely to live within socially deprived areas already affected by a poor quality environment and in close proximity to potential waste sites;
  - promoting the circular economy and the co-location of complementary waste facilities to support manufacturing-from-waste with waste management facilities has potentially significant benefits for certain equalities target groups, in particular certain faith groups, older people and young people, who are more likely to be affected by social and economic deprivation, who would thus benefit from enhanced and more widespread local employment and educational opportunities; and
  - co-location, along with other measures likely to promote 'linked trips', would have particular benefits for disabled people, along with children and older people, who are more vulnerable to the adverse health and social impacts of road transport compared to the wider community.
  - introducing a new commitment through proposed Policy WP8 'New Development Affecting Waste Sites' to ensure that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and quality of life. In certain circumstances, this will help to avoid or mitigate the adverse impacts of waste operations and associated HGV movements on vulnerable groups such as the elderly, the young, people suffering from health problems and people living within socially deprived areas arising from air pollution, dust, noise, water pollution, surface water run-off, light pollution and impacts on the local road network; and
  - introducing a new commitment through Policy WP10 'Monitoring and Contingencies' to ensure that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on an annual basis and that consultation will take place between the partner boroughs to determine whether any of the contingency actions listed in Appendix 1 of the draft SLWP need to be taken. Ongoing monitoring and review is therefore provides a further guarantee that the various beneficial impacts for equalities groups identified in the EqIA matrix can be delivered.

**4.5** Overall, there will be less significant benefits specifically in relation to **Women; BME/Faith groups; LGTB people and Gypsies & Travellers** since any beneficial impacts on these groups are likely to be broadly in line with those experienced by the wider community.

## Next Steps

**4.6** This EqIA Report, which accompanies the SA Report (as Appendix 1) is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from 4 September to 22 October 2020. Copies are available at the following locations:

- <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sl-waste-plan/>;
- [www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/1353/new\\_local\\_plan/](http://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan/);
- [www.merton.gov.uk/local-plan/](http://www.merton.gov.uk/local-plan/); and
- [www.sutton.gov.uk/currentconsultations.](http://www.sutton.gov.uk/currentconsultations/)

**4.7** Following the Regulation 19 consultation stage, a finalised version of the EqIA Report will be prepared alongside the proposed SLWP 2021-36 and accompanying SA Report for formal submission to the government. In due course, the EqIA Report will be considered by the Planning Inspector at the Examination-in-Public.

## Appendix 2

# HABITATS REGULATIONS ASSESSMENT (HRA)

Draft South London Waste Plan (SLWP)

Submission Version

September 2020



# 1. Background to Habitats Regulations Assessment (HRA) Screening

**1.1** The requirement for public authorities to undertake Habitats Regulations Assessment (HRA) plans or projects (sometimes termed 'Appropriate Assessment') is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive').

**1.2** The aim of the Habitats Directive is to conserve natural habitats and wild species across Europe by establishing a network of sites known as Natura 2000 sites. Under Article 6(3) of the Habitats Directive, an HRA is required where a plan or project is likely to have a significant effect upon a European site, either individually or in combination with other projects.

**1.3** Further to this, Article 6(4) states that where an HRA has been carried out and results in a negative assessment (in other words, the development will adversely affect the site(s) despite any proposed avoidance or mitigation measures or if uncertainty remains), consent will only be granted if there are no alternative solutions, there are Imperative Reasons of Overriding Public Interest (IROPI) for the development, and compensatory measures have been secured.

**1.4** The protection given by the Habitats Directive have been incorporated into UK legislation through the Habitats Regulations 2010 (as amended). The Regulations are responsible for safeguarding designated European sites within the UK and therefore for protecting the habitats and species listed in the Annexes of the Directive. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on any of the above sites.

**1.5** The purpose of undertaking HRA in the preparation of land use plans is to ensure that the protection and integrity of European sites is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that HRA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section<sup>24</sup> (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A -85E) which requires local planning authorities to undertake HRA of land use plans in England and Wales in line with the Directive.

**1.6** These HRA requirements were carried forward in the Conservation of Habitats and Species Regulations 2017 and therefore have legal force despite the UK's formal departure from the European Union on 31 January 2020.

## 2. The role of Natural England

**2.1** As a public body, Natural England has important statutory duties and responsibilities as defined in the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'), which transpose the European Habitats Directive 1992 and the Wild Birds Directive 2009 into English law. The Habitats Regulations require Natural England to 'secure compliance' with the requirements of the Directives when specifically discharging its nature conservation functions and to have regard to the requirements of the Directives when exercising all of its other functions (Regulation 9). Natural England becomes a 'competent authority' under the Regulations when the exercise of its functions will or may affect European Sites (for example classified SPAs and designated SACs).

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<sup>24</sup> entitled 'Appropriate Assessments for Land Use Plans in England and Wales'.

2.2 Natural England is a statutory consultee on strategic plans including Development Plans Documents (DPD) such as the SLWP, as well as on related HRA assessments. The Natural England 'Operational Standard Responding to Consultations on Development' (NE, 2017)<sup>25</sup> states that

*"We will advise Competent Authorities on HRAs where we consider the plan or project is likely to have a significant effect on a European site, either individually or in combination with other plans or projects. We will advise on any Appropriate Assessments (AA), including the measures proposed to avoid, mitigate or compensate for significant adverse effects. We will work closely with decision makers and developers to find solutions to adverse environmental impacts and to maximise common ground. We may, in the last resort, be obliged to object to plans or projects where:*

- *an AA does not incorporate sufficient information or necessary mitigation measures*
- *adverse effects on site integrity cannot be ruled out or*
- *where there are imperative reasons of overriding public interest to justify the development and the proposed compensatory measures are not sufficient to ensure the overall coherence of the Natura 2000 network".*

2.3 Accordingly, the Government's National Planning Practice Framework (NPPF) (2019) confirms that competent authorities must consult Natural England for the purposes of the HRA assessments and must have regard to any representations that Natural England may wish to make. This includes the provision of formal HRA screening advice to local planning authorities (including joint authorities).

## 3. European sites potentially affected by the new SLWP

3.1 The following four European sites are located within or in relatively close proximity to the plan area and are therefore potentially affected by the new SLWP 2021-36:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).

3.2 Map 3.1 shows the location of these sites in relation to the boundaries of the London Borough of Sutton, one of the four partner boroughs. It can be seen that only Wimbledon Common SAC lies within the boundaries of the SLWP area.

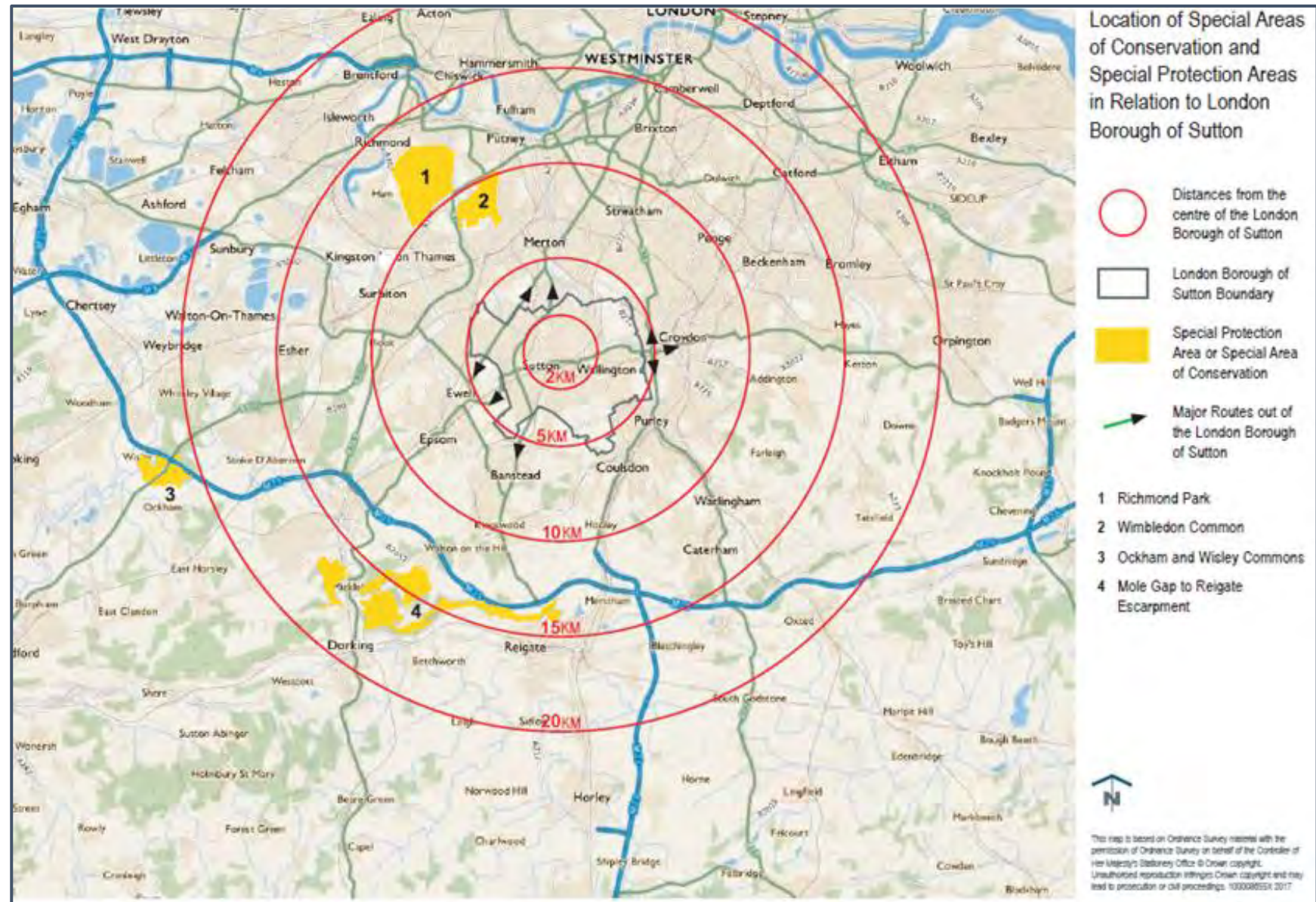
3.3 Natural England's formal advice on conservation objectives is publicly available for all European sites. The advice is not repeated here in full, but Table 3.1 below provides links to the respective conservation objectives, supplementary advice on conserving and restoring site features.

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<sup>25</sup> see [file:///civvmi\\_vnas07/MyDocs\\$/patrick.whitter/Downloads/NESTND037%20Operational%20Standard%20V1.0%20EXTERNAL%20\(2\).pdf](file:///civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/NESTND037%20Operational%20Standard%20V1.0%20EXTERNAL%20(2).pdf)



Map 3.1: Location of Special Areas of Conservation (SACs) and Special Protection Areas in relation to the South London Waste Plan Area



**Table 3.1 Links to Conservation Objectives, Supplementary Advice and SAC Citations for European Sites**

European Site	Conservation Objectives	Supplementary Advice	SAC Citation
Richmond Park SAC;	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030246%20RichmondPark%20SACV2018%20(1).pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030246%20RichmondPark%20SACV2018%20(1).pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030082_RichmondParkSAC_COSA_final%20advice%2031%20May%202016.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030082_RichmondParkSAC_COSA_final%20advice%2031%20May%202016.pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Richmond%20Park%20citation.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Richmond%20Park%20citation.pdf</a>
Wimbledon Common SAC;	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030301%20WimbledonCommon%20SACV2018%20(1).pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030301%20WimbledonCommon%20SACV2018%20(1).pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030301_WimbledonCommonSAC_supplementary%20advice_final%20advice%2031%20May%202016.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030301_WimbledonCommonSAC_supplementary%20advice_final%20advice%2031%20May%202016.pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Wimbledon%20Common%20citation.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Wimbledon%20Common%20citation.pdf</a>
Mole Gap to Reigate Escarpment SAC	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0012804%20MoleGaptoreigateEscarpment%20SACv2018.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0012804%20MoleGaptoreigateEscarpment%20SACv2018.pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0012804_MoleGapToReigateEscarpmentSAC_COSA_Final%20Published%2025%20Jan%2019%20(3).pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0012804_MoleGapToReigateEscarpmentSAC_COSA_Final%20Published%2025%20Jan%2019%20(3).pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Mole%20Gap%20to%20Reigate%20Escarpment%20citation.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Mole%20Gap%20to%20Reigate%20Escarpment%20citation.pdf</a>
Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA.	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK9012141-Thames-Basin-Heaths-SPA-V2019.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK9012141-Thames-Basin-Heaths-SPA-V2019.pdf</a>	<a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK9012141%20-%20Thames%20Basin%20Heaths%20SPA%20-%20COSA%20Final%20-%2009%20May%202016%20v2.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK9012141%20-%20Thames%20Basin%20Heaths%20SPA%20-%20COSA%20Final%20-%2009%20May%202016%20v2.pdf</a>	<a href="https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001052.pdf">https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001052.pdf</a> <a href="file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/TB_Heaths_spa%202.pdf">file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/TB_Heaths_spa%202.pdf</a>

Source: Natural England website May 2020

## 4. Consultation with Natural England on draft HRA screening assessment

4.1 A draft HRA screening assessment of the emerging SLWP was previously undertaken at the SLWP Issues and Preferred Options stage and included as Appendix 2 to the accompanying SA Report. The draft screening assessment concluded that a full HRA was not required and identified the main reasons underlying this view.

4.2 The HRA screening assessment was published for public consultation between 31 October and 22 December 2019. In addition, an earlier formal HRA screening request on the SLWP was submitted to Natural England via email and letter dated 16 September 2019 (attached).

4.3 In response to the HRA screening request, a letter was received from Sharon Jenkins of Natural England on 17 October 2019 which stated that Natural England "have no comments to make on this plan" (see attached). While this initial response was interpreted by the four boroughs as endorsing the conclusion that no HRA was required, a follow-up email was sent to Natural England on 22 January 2020 to provide more clarity.

4.4 Natural England's subsequent response, received by email from Marc Turner (Senior Planning Advisor) on 31 January 2020, provided further support for screening out a full HRA:

*"I can confirm nothing has changed in the 4 Boroughs covered by your plan, to currently change the conclusion of that advice from Natural England. There is nothing I know about on the horizon either that is likely to change that advice. So to confirm, we do not feel anything other than a brief HRA Screening is required".*

4.5 The initial HRA screening conclusions have therefore been carried forward in this document unaltered for purposes of consultation on the draft SLWP Submission Version (Regulation 19 consultation)

## 5. HRA Screening conclusions

5.1 It is considered that a full HRA is not required for the new SLWP for 2021-36 for the following reasons:


- no new waste management sites are currently proposed to be safeguarded in the draft SLWP Submission Version and the wider industrial areas formerly identified in Schedule 2 of the existing SLWP as being suitable for waste management uses are proposed to be removed from waste uses;
- the total volume of waste arisings to be managed in South London over the plan period from 2021-36 and the size of the combined London Plan apportionment for the four boroughs in the new London Plan is significantly reduced by comparison with the situation which existed when the current SLWP was being prepared (between 2008 and 2011). Since the existing SLWP was screened out of the need for a full HRA, it seems reasonable to assume that the new plan may also be screened out on the basis that there will be fewer safeguarded sites, smaller throughputs and therefore an overall reduction in waste-related HGV movements;
- the two sites to the south of the plan area, Mole Gap to Reigate Escarpment SAC and Ockham and Wisley Commons SSSI are over 10 km away from the plan boundaries and, according to expert air quality advice provided to LB Sutton at the Examination-in-Public on the Sutton local

Plan in 2017, emissions from transport movements are extremely unlikely to have a significant effect on the rate of NO<sub>2</sub> disposition plant species over this sort of distance. It is understood that the Richmond Park SAC is not sensitive to elevated levels of air pollution designated for biodiversity features that are not air quality-sensitive (this area is important for stag beetle populations);

- the draft SLWP Submission Version seeks to promote the highest standards of sustainable design and construction in new or upgraded waste facilities; a shift away from waste transfer to waste management practices higher up the waste hierarchy; cleaner, more efficient waste management technologies in enclosed buildings; and the principles of the circular economy. All of these trends will serve to reduce any adverse effects upon the identified European sites; and
- the proposed strategy for the management of waste arisings in South London is geared towards achieving self-sufficiency and therefore limit imports and export of waste streams to a from the boundaries of the plan area (longer distance HGV movements would be more likely to impact directly upon more distant nature conservation sites).

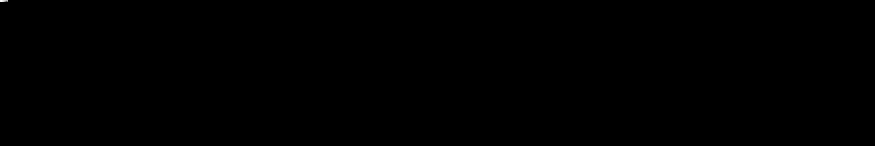


## ANNEX: CONSULTATION WITH NATURAL ENGLAND ON HRA SCREENING

 Patrick Whitter <patrick.whitter@sutton.s...

**Habitats Regulations Assessment (HRA) Screening for joint South London Waste Plan**

1 message

 25 September 2019

Dear Sir or Madam,

The London boroughs of Croydon, Kingston, Merton and Sutton are now preparing a joint South London Waste Plan (SLWP) covering the time period 2021-38. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21 introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste management facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set in the draft London Plan up to 2038, including the aim of net self-sufficiency by 2026; and
- setting out appropriate planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy


As part of the initial stages of plan-making, we have already prepared an **SA/SEA Scoping Report (attached)** which has recently been sent to the relevant contacts at Natural England, Historic England and the EA for their input (15 September-21 October 2019). Public consultation on the SLWP Issues and Preferred Options document together with a further SA/SEA Report is scheduled to take place from 31 October to 22 December 2019 subject to Committee approval on 8 October.

As the officer responsible within the SLWP team for overseeing the SA/SEA, Equalities Impact Assessment (EqIA) and HRA processes, I would be very grateful if you could clarify the following key issues:

**(1) At what stage of the plan-making process should an HRA Screening Assessment be prepared?**  
We were thinking that an HRA Screening Assessment could be published for public consultation alongside the SLWP Issues and Preferred Options document from 31 October to 22 December 2019. This would be accompanied by a request to Natural England for screening advice. If the outcome of screening determines that a full HRA was required in relation to the joint SLWP, there would still be ample opportunity to prepare and consult on this at the Submission draft stage. However it would be useful to have your advice on whether an HRA Screening Assessment needs to be published in advance of consultation on Issues and Preferred Options i.e. in the next 5 weeks.


**(2) Does Natural England once again provide formal HRA screening advice to local planning authorities?**  
When the Sutton Local Plan was being produced between 2014 and 2018, Natural England were not in a position to provide formal HRA screening advice. However colleagues have advised me that this service has now been resumed so I would be very grateful if you could clarify how the procedures for consulting on HRA Screening reports are now meant to operate.

Any advice you could offer on the above HRA issues would be very gratefully received.

Regards  


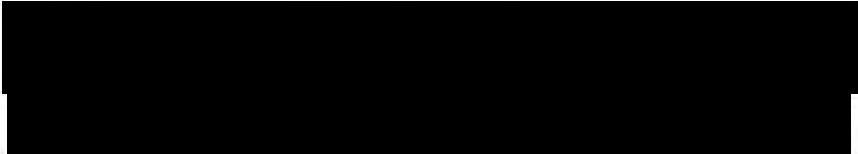




 Patrick Whitter <patrick.whitter@sutton.gov.uk>

**Re: Habitats Regulations Assessment (HRA) Screening for the joint South London Waste Plan - Urgent Request for Advice**

1 message

 22 January 2020 at 15:28

Dear Sir or Madam,

I'm not sure whether my previous email regarding the South London Waste Plan and HRA screening (dated 25 September 2019) was picked up by anyone at Natural England, but I now need some advice on this issue as a matter of urgency.

As I outlined before, three London boroughs of Croydon, Kingston, Merton and Sutton are now preparing a joint South London Waste Plan (SLWP) covering the time period 2021-38. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21 introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste management facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the draft London Plan up to 2038, including the aim of net self-sufficiency by 2026; and
- setting out appropriate planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy

As part of the initial stages of plan-making, we have already prepared an **SA/SEA Scoping Report (attached)** which was sent to the relevant contacts at Natural England, Historic England and the EA for their input (16 September-21 October 2019). Public consultation on the SLWP Issues and Preferred Options document together with a further SA/SEA Report took place subsequently from 31 October to 22 December 2019.


As the officer responsible within the SLWP team for overseeing the SA/SEA, Equalities Impact Assessment (EqIA) and HRA processes, I would be very grateful if you could clarify the following key issues:

**(1) At what stage of the plan-making process should an HRA Screening Assessment be prepared?**  
A brief HRA Screening Assessment was included as part of the SA/SEA Report on the SLWP Issues and Preferred Options document published for public consultation from 31 October to 22 December 2019, and this concluded that a full HRA was not required. However, if Natural England were to advise the four partner boroughs that an HRA was required after all, there would still be an opportunity to prepare and consult on a full HRA at the Submission draft stage. It is therefore essential that we can have some indication of whether Natural England believes that full HRA is merited in this case.

**(2) Does Natural England once again provide formal HRA screening advice to local planning authorities?**  
When the Sutton Local Plan was being produced between 2014 and 2018, Natural England were not in a position to provide formal HRA screening advice. However colleagues have advised me that this service has now been resumed so I would be very grateful if you could clarify how the procedures for consulting on HRA Screening reports are now meant to operate.

Any advice you could offer on the above HRA issues would be very gratefully received.

Regards



Patrick Whitter <patrick.whitter@sutton.gov.uk>

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**RE: 295937 Habitats Regulations Assessment (HRA) Screening for the joint South London Waste Plan - Urgent Request for Advice**

1 message

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31 January 2020 at 14:17

Thank you for your email. Please find the answers to your questions below;

1. Natural England can technically give advice at any and all stages of the plan making process when it comes to HRA. It depends on the situation, the plan, designated sites, legal decisions etc. I see you consulted us on an SA / SEA consultation. We thought we sent you a No Comment, no HRA required, but I infer from your email that you may never have received that. I can confirm nothing has changed in the 4 Boroughs covered by your plan, to currently change the conclusion of that advice from Natural England. There is nothing I know about on the horizon either that is likely to change that advice. So to confirm, we do not feel anything other than a brief HRA Screening is required.
2. Natural England have always tried to provide advice when consulted. Working in the South East of England we have high turnover of staff that can affect our ability to respond on time to all consultations. If you were to consult us, then you should receive a response from us. As above though, to me, it doesn't seem worthwhile consulting us again as nothing has changed and our advice stands.

I hope this helps,

Kind Regards

# Appendix 3

## CONSULTEE RESPONSES TO SA SCOPING REPORT

Draft South London Waste Plan (SLWP)

Submission Version

September 2020





## (1) Environment Agency: 28 October 2019

creating a better place  
for people and wildlife



Date 28 October 2019  
Ref: SL/2006/100128/SE-03/SP1

### Statutory consultation with Environment Agency on Sustainability Appraisal (SA) Scoping Report (incorporating SEA) for the South London Waste Plan

Thank you for consulting the Environment Agency on the review of the South London Waste Plan and Sustainability Assessment Scoping Report. We welcome the review of the South London Waste Plan and see the key issues and opportunities relate to

- Maximising opportunities to plan strategically for ongoing changes in the Waste management sector, tackling waste crime and delivering government objectives to move towards a circular economy in line with the Resources and waste strategy for England (December 2018) and Independent review into serious and organised crime in the waste sector (November 2018) and the emerging new London Plan. We have provided comments in Section 1 on the key strategies and guidance on Waste Management which should be assessed and used to inform the policies and proposed sites within the new South London Waste plan.
- Continued partnership working to ensure waste management infrastructure is "fit for purpose" and resilient to a changing climate and supports the rising numbers of new households across, Croydon, Kingston, Merton and Sutton and a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process.
- Promoting partnership working with other agencies such as Health and Safety Executive (HSE) Public Health England and Planning Enforcement and Environmental Health teams, Metropolitan Police, London Fire Brigade, Driver & Vehicle Standards Agency (DVSA) Her Majesty's Revenue and Customs (HMRC) and Border Force to prevent illegal or poor compliant waste management sites.

- Using the latest evidence on flood risk and climate change to ensure existing and new waste management facilities are located and designed to be resilient to extreme weather events. The latest environmental data sets are available to download from the Defra Data Services Platform
- Developing checklists and guidance as part of the new plan to ensure new and existing waste management sites follow the latest good practice to ensure full enclosure of waste activities in high quality buildings to reduce environmental impacts and are designed to the highest standards to reduce air pollution, noise, surface water pollution and high standards of fire prevention measures
- Sharing information and evidence on the environmental performance and permit compliance across the Plan area.

We hope our comments are helpful and look forward to working with you as the plan progresses to the next stage. If you have any questions or require more information please let me know.

Yours sincerely

**Waste Team Leader  
South London**



### Section 1 - Feedback on the Scoping Report (September 2019)

We recommend the Scoping Report is updated to include the latest key waste management strategies listed below.

- **HM Government 25 Year Environment Plan (December 2018)**
- **Resources and waste strategy for England (December 2018)**
- **Independent review into serious and organised crime in the waste sector (November 2018)**

These strategies are promoting an integrated approach to resource and waste management, promoting circular economy, reducing pollution and tackling waste crime.

The planning system has an essential role to play in the successful delivery of these strategies and needs to be included within the Scoping Report and requires partnership working.

**HM Government 25 Year Environment Plan**  
**Resources and waste strategy for England (December 2018)**  
**Independent review into serious and organised crime in the waste sector (November 2018)**

HM Government 25 Year Environment Plan  
<https://www.gov.uk/government/publications/25-year-environment-plan>

'A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation. Please refer to Chapter 4 which set strategic goals for increasing resource efficiency and reducing waste pollution and waste.

Chapter 4: Increasing resource efficiency and reducing pollution and waste

1. Maximising resource efficiency and minimising environmental impacts at end of life.
  - i. Achieving zero avoidable plastic waste by the end of 2042
  - ii. Reducing food supply chain emissions and waste
  - iii. Reducing litter and littering
  - iv. Improving management of residual waste
  - v. Cracking down on fly-tippers and waste criminals
  - vi. Reducing the impact of wastewater

The South London Waste Plan review should consider how it can help deliver these strategic objectives locally.

**Resources and waste strategy for England (December 2018)**  
<https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>





- preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy
- minimise the damage caused to our natural environment by reducing and managing waste safely and carefully
- Deal with waste crime

"Our Strategy focuses on known problems with effective solutions that, among other benefits, will reduce our reliance on single-use plastics, cut confusion over household recycling, tackle the problems of packaging and end the economic, environmental and moral scandal that is food waste.

We also tackle the problem of waste crime, which cost the English economy around £600 million in 2016, harms local communities and which pays no heed to the value of scarce resources.

Our goal is to maximise the value of the resources we use, minimise the waste we create, cut emissions and help create a cleaner, greener, healthier planet." Our plan is to become a world leader in using resources efficiently and reducing the amount of waste we create as a society. We want to prolong the lives of the materials and goods that we use, and move society away from the inefficient 'linear' economic model of 'take, make, use, throw'.

**We recommend the South London Waste Plan review considers how it can help deliver this national strategy locally and increase the focus on reducing waste crime, use of plastic and reduce food waste across the plan area.**

**Independent review into serious and organised crime in the waste sector (November 2018)**  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/756526/waste-crime-review-2018-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756526/waste-crime-review-2018-final-report.pdf)

'Waste crime' takes many forms, including fly-tipping, illegal dumping or burning of waste, deliberate mis-description of waste, operation of illegal waste management sites, and illegal waste export. It has significant economic impacts: in 2015 illegal waste activity was estimated to have cost over £600 million in England alone. Some estimates put this at an even higher figure of £1 billion. (page 3)

The intentional mis-description of waste is widespread in the construction and demolition industry, with hazardous waste frequently labelled as 'inert' to avoid the highest band of landfill tax. In one case, involving a major, mixed-use development on a brownfield site in South London, the mis-description of over 1000 tonnes of hazardous waste led to it being transferred to sites lacking the controls to ensure its safe disposal. Not only did this present a serious environmental and public health risk; it also represented a tax avoidance of several million pounds. (page 16)

**Given the ongoing high levels of regeneration and development across the plan area we recommend the South London Waste Plan review should consider how it can help tackle waste crime and deliver policies / guidance to address this serious environmental issue.**



Given the scale of this environmental issue across London could the plan look at the need for Site Waste Management Plans being a policy requirement across the plan area to track and audit waste movements to prevent environmental damage.

Identify steps to ensure vacant sites (e.g. prior to demolition/planning permission) have high standards of security to protect them from illegal waste activities such as empty buildings being broken into and large amounts of wastes deposited and then abandoned. This could be a condition on new planning permissions to ensure the site is secured / protected and ensure the landowner is made aware they are responsible for any clean-up costs if waste is deposited on their site so understand the importance of good security measures to reduce waste crime.

#### Emerging new London Plan

The emerging new London Plan waste management policies promote a circular economy and managing waste within London's boundaries. This requires high quality and well maintained waste management infrastructure e.g. to manage waste from rising numbers of new residents being introduced into regeneration areas. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>

We recommend a detailed assessment of the existing Local Authority Waste Management sites across Croydon, Kingston, Merton and Sutton and if they have sufficient capacity / are resilient to cope with a population across the boroughs and if not if new or extra waste management facilities are required in addition to the current sites.

For new or modernising waste management sites it's essential they are designed with high quality infrastructure following the latest environmental good practice on minimising dust, noise, pollution, drainage, fire risk, etc. and all waste activities are carried out in fully enclosed modern buildings.

If waste management sites are being lost to residential land uses an assessment should be made on what impact this will have across the borough and the cumulative impact of loss of waste management sites and how that will be managed

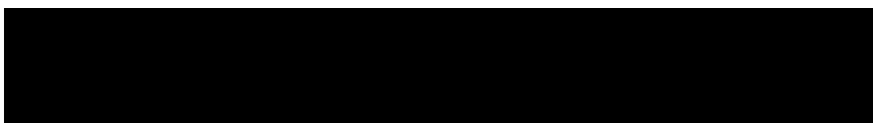
#### Detailed waste management sites feedback

We are reviewing the sites listed in Table 3.4 on Page 15 – 17 and are keen to discuss the latest information and evidence on existing waste management sites.

Some of the listed sites may require major infrastructure upgrade and in their current state may not be suitable unless infrastructure upgrade works are carried out urgently and permit compliance improved. We are keen to discuss process for annual reporting on compliance with Waste Permits and how this can be an indicator in the new South London Waste plan.

We are assessing the sites listed against the following criteria

Current environmental permit compliance rating – all sites with an Environment Agency permit are assessed from A to F with A being most compliant with the permit





conditions and F least compliant (see diagram below for compliance rating process). These compliance ratings are only based on the last detailed site visit and the current performance of the site could have improved / decreased.

**Date site last visited by the Environment Agency** – we aim to inspect all permitted waste sites at least once a year. Some sites will be visited more depending on compliance issues or environmental incidents. Poor performing sites will be prioritised to either comply with permit conditions or enforcement action taken to revoke the environmental permit.

**Drainage issues on site?**

Some sites have insufficient or poorly maintained drainage systems causing dust and mud to accumulate on site and mud to leave the site following lorry movements from sites. All waste management sites should be designed and operate to high environmental standards and we are keen to work with you to develop a checklist / guidance to cover this issue as part of the new South London Waste Plan.

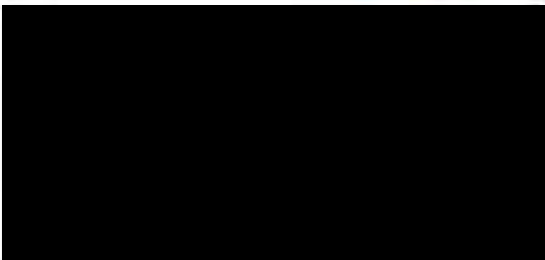
**Is the site within a “waste cluster”?** Across the South London Waste Plan area there are a number of “clusters” of waste management sites which are

- Beddington Lane
- Weir Road
- Willow Lane

We are keen to organise some site visits to these cluster areas and will be in touch to organise some visits to learn more about the ongoing waste management issues and opportunities across the plan area.

We are also assessing, flood zone designation, Source Protection Zone, Air Quality Management Area, if the sites are currently enclosed or not, is there a main river on or adjacent to the site.

## (2) Historic England: 21 October 2019



Our ref: PL00622325

Date: 21/10/2019

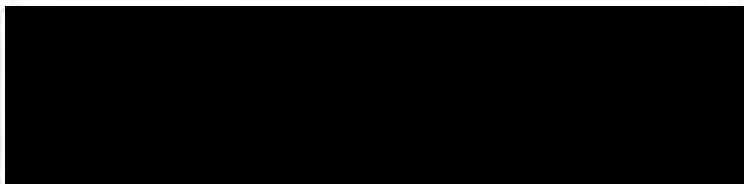


RE: SA/SEA Scoping Report on new South London Waste (SLWP) 2021-36 dated September 2019

Thank you for consulting Historic England on the Sustainability Appraisal (SA) Scoping Report for the new South London Waste Plan (SLWP) 2021-36. We note that the SLWP covers the London boroughs of Croydon, Kingston, Merton and Sutton. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.

### Historic England Advice

At this stage we do not consider that the SA Report adequately addresses the historic environment. The report provides a brief framework and much will depend on how it is taken forward. It is important that the SA/SEA process brings some additional understanding and rigour to Waste Development Plan Documents and, with this in mind you should consider expanding the historic environment baseline. While data on numbers of listed buildings and conservation areas are appropriate, it would be helpful to include commentary on other relevant matters that relate to waste developments e.g. the nature of the archaeological resource, the character of the district's historic settlements and their potential vulnerability. It is important also that cultural heritage and townscape are not artificially separated – the strong link between conservation areas and townscape should be clear.





### Section 3: Current Waste Arisings and Capacity in South London

*Is the proposed appraisal methodology set out in Section 3 sound and consistent with meeting the requirements of both SA and the SEA Directive?*

Page 11 states that a Technical Paper has been prepared and that this paper sets out potential sites/areas which could help meet any capacity gap, either through the intensification of existing operations, or through the delivery of new sites. At this stage this site information has not been shared with us for comment. Any new proposals or site allocations need to carefully consider the impact on the surrounding historic environment, demonstrating that the impact can be adequately mitigated.

### Section 5: Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

*Have any relevant plans, programmes and sustainability objectives been omitted from Section 4 and the scoping table presented in Appendix 2?*

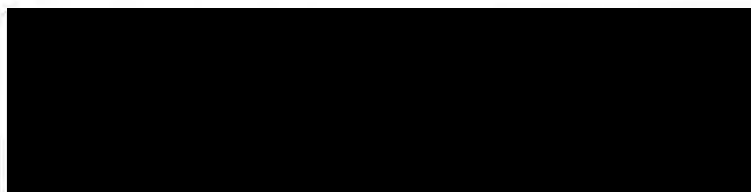
We consider that Tasks A1-A5 set out in Section 4 of the SA Report are appropriate steps to take for this stage of the SA process.

There are a number of other relevant plans and programmes that should be included in section 5, as follows:

- UNESCO World Heritage Convention
- The European Convention on the Protection of Archaeological Heritage
- Convention for the Protection of the Architectural Heritage of Europe
- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979

The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on existing Conservation Area Appraisals and Management Plans from each of the participating London Boroughs.

The Greater London Historic Environment Record (GLHER) should also be listed here given that it provides some of the most up-to-date information on the historic environment. The GLHER should also form part of the Plan's Baseline Evidence in section 6.





Section 6: Baseline (Task A2)

*Does the baseline information in Section 6 provide a complete picture of the environmental, economic, and social and equalities factors that need to be considered?*

All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas.

The Scoping Report does set out data relating to the numbers of Conservation Areas, Scheduled Monuments and Registered Parks and Gardens located within the Plan area (table 6.59 pg. 76). Only the numbers of Listed Buildings at Risk are listed, we recommend that the overall numbers are also referenced. Helpfully, this table also makes reference to some non-designated heritage assets such as Areas of Special Local Character and Locally Listed Buildings. However, in order to ensure that the potential exhibited by non-statutory preceded archaeological sites is clearly represented at this high level, it would be helpful if this table included number of Archaeological Priority Areas (APAs) there are within each borough and the total area per borough they represent. Reference could therefore be made the draft London Plan and the APA review to the Tier model which will mean that all areas of a borough are assigned to one of four levels of archaeological significance. APAs indicate areas that have archaeological potential, and may contain as of yet undiscovered remains of potentially national interest. Given this the need for preservation in situ of archaeological evidence is not the preserve of Scheduled sites and so early engagement will be key to inform future design options or site selection.

Identification and mapping of APAs and heritage assets at risk can provide an indication of clusters and themes that will help identify sites and key issues surrounding their development.

The National Heritage at Risk Register should form part of the Baseline evidence. Other sources of evidence include:

- National Heritage List for England, [www.historicengland.org.uk/the-list/](http://www.historicengland.org.uk/the-list/)
- Heritage Gateway [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)
- GLHER Historic Environment Record.
- Heritage Impact Assessments looking into significance and setting.







Historic England

- Visual Impact assessments
- Archaeological assessments
- Topic papers

#### Section 7: Key Sustainability Issues (Task A3)

*Do the key sustainability issues outlined in Section 7 reflect all the significant social, economic and environmental factors relevant to the South London area?*

It is regrettable that the historic environment is not recognised as a key sustainability issue in section 7. We note that heritage issues are amalgamated into Issue 14 *Townscape and Visual Amenity*, but this does not sufficiently cover all aspects of the historic environment. The conservation and enhancement of the historic environment is a key objective of sustainable development as set out in the NPPF, and as such we expect to see it recognised in the SA.

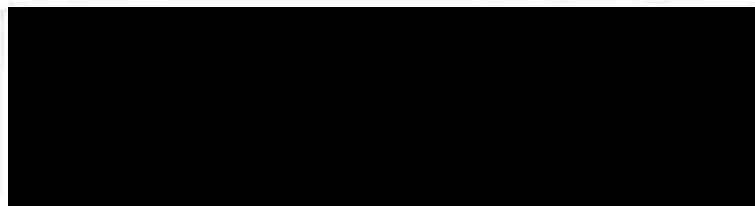
#### Section 8: Sustainability Appraisal Framework for the South London Waste Plan (task A4)

*Does the proposed SA Framework set out in Section 8 identify an appropriate range of sustainability objectives, indicators and targets for the purpose of appraising and monitoring the significant effects of the plan and alternative options?*

We raise considerable concern to the lack of a stand-alone objective on the historic environment in the Sustainability Appraisal Framework.

Objective 14: *Townscape and Visual Amenity* does try and incorporate historic environment issues but does not do this successfully. Notwithstanding our advice above, which is that standalone objective on the historic environment is required, the Appraisal Questions to objective 14 are inappropriate. Potential adverse impacts should be avoided in the first instance whereas the appraisal question asks only for harm to be minimised suggesting that harm is built in as acceptable from the outset. No reference is made to the setting of heritage assets in the question or to Heritage at Risk.

The SA is the principle tool for monitoring the effects of the SLWP in operation. Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan's implementation. The indicators set in the table on page 96 are not helpful as they cannot be easily measured. Indicators that monitor the numbers of entries either added or removed to HAR registers as a result of waste developments, or monitoring







the effects of waste sites on the setting of designated heritage assets etc. would be more appropriate. Guidance on indicators and monitoring in respect of the historic environment can be found in advice note listed in the conclusion section of this letter.

Issues such as light pollution, noise, vibration and other disturbance from waste sites can have an adverse effect on residential amenity and biodiversity but this applies equally to the historic environment. Such disturbance can cause direct physical damage to historic buildings and sites both above and below ground, and greatly compromise their settings. It is advised that the SA recognises the impact that these less tangible influences can have upon the historic environment.

We advise that an additional Objective for the historic environment is added. We would suggest that the starting point for formulating Key Sustainability Issues for the Historic Environment should include:

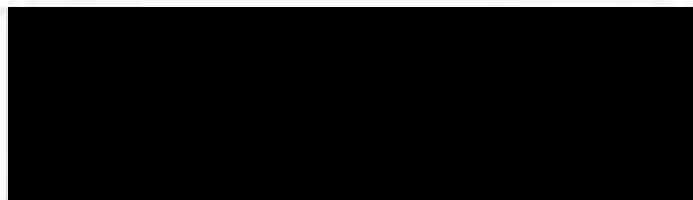
- Conserving and enhancing designated and non-designated heritage assets (including archaeology) and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape /townscape character or quality, or where development has had or is likely to have significant impact (direct and/or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

It would be helpful if the SA included an objective to monitor how land could be restored once waste operations have been concluded on sites.

#### Appendix 1 - Glossary

Finally, there should be an entry for 'Historic Environment' with an interpretation that references both above and below ground designated and non-designated heritage assets.

The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.





Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled.

### Conclusion

Historic England has published guidance on Sustainability Appraisals that you may find helpful. This document contains details on baseline information, sustainability issues and objectives, indicators and monitoring:

*Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment* <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

Other documents you may find helpful are:

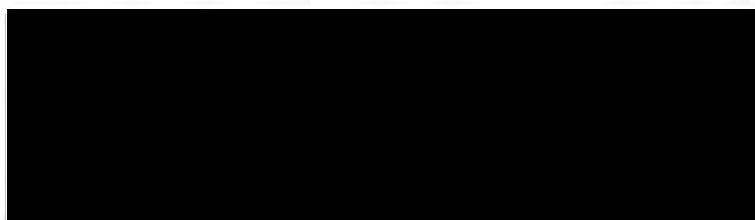
The Setting of Heritage Assets - Good Practice Advice in Planning 3  
<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

The Historic Environment and Site Allocations in Local Plans - Advice Note 3  
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here:  
<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>

In preparation of the forthcoming SLWP, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a waste site, identification of heritage issues for a particular allocation does not automatically correspond



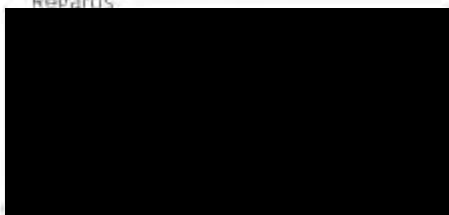


to the support for inclusion of the alternative sites, given we have not yet been asked to assess the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Should you have any queries on the above, please do not hesitate to contact us.

Regards



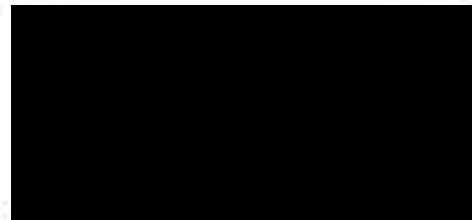
## (1) Natural England 17 October 2019

Date: 17 October 2019  
Our ref: 295079  
Your ref: London Waste Plan



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Planning Consultation: SA/SEA Scoping Report on new South London Waste (SLWP) Plan 2021-36

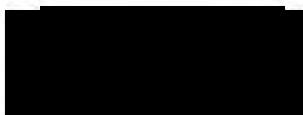
Thank you for your consultation on the above Strategic Planning Consultation, dated 16<sup>th</sup> September, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have no comments to make on this plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely



# Appendix 4

## GLOSSARY

Draft South London Waste Plan (SLWP)

Submission Version

September 2020





# Glossary

## **Agricultural Waste**

Waste from a farm or market garden, consisting of matter such as manure, slurry and crop residues

## **Anaerobic Digestion**

Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be useful, for example biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used on farms as a fertiliser

## **Beneficial Use**

The placement of excavation waste in a way that:

- (1) provides environmental benefits, particularly in the restoration of priority habitats, flood alleviation or climate change adaptation/mitigation; or
- (2) contributes towards the restoration of landfill sites or mineral workings

## **Circular Economy**

Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: Design out waste and pollution; Keep products and materials in use; Regenerate natural systems (Ellen MacArthur Foundation)

## **Commercial Waste**

Controlled waste arising from trade premises

## **Construction and Demolition Waste**

Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

## **DEFRA - Department for Environment, Food and Rural Affairs**

Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment

## **Energy from Waste**

The conversion of waste into a useable form of energy, often heat or electricity

## **Environment Agency**

A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice

## **Exemption**

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within

**Hazardous Landfill**

Sites where hazardous waste is landfilled. A dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste

**Hazardous Treatment**

Sites where hazardous waste is treated so that it can be landfilled

**Hazardous Waste**

Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste

**HIC**

Household, Commercial waste and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams

**Historic Environment**

Both above ground and below ground designated and non-designated historic assets.

**Household Waste**

Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and "bring sites"

**Industrial Waste**

Waste from a factory or industrial process

**Inert waste**

Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater

**Inert Landfill**

A landfill site that is licensed to accept inert waste for disposal

**In-Vessel Composting**

A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are many different systems, but they can be broadly categorised into six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls

**ILW - Intermediate level radioactive waste**

Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities

**Local Authority Collected Waste (LACW)**

Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials

**Landfill**

The permanent disposal of waste into the ground, by the filling of man-made voids or similar features

**Landfill Directive**

European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation

**LLW – low level radioactive waste**

Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

**Materials Recycling Facility (MRF)**

A facility for sorting and packing recyclable waste

**Mechanical Biological Treatment (MBT)**

Treatment of residual waste using a combination of mechanical separation and biological treatment

**Non- Hazardous Landfill**

A landfill which is licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet the relevant waste acceptance criteria

**Non- Inert**

Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change once landfilled

**Organic Waste**

Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

**Open Windrow Composting**

A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

**Proximity Principle**

Waste should be managed as near as possible to its place of production, reducing travel impacts

**Recovery**

Value can be recovered from waste by recovering materials through recycling, composting or recovery of energy

**Recycled Aggregates**

Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads

**Recyclate**

Raw material sent to, and processed in, a waste recycling plant or materials recovery facility (e.g. plastics, metals, glass, paper/card)

**Recycling**

The reprocessing of waste either into the same product or a different one

**Residual Waste**

Waste remaining after materials for re-use, recycling and composting have been removed

**Waste Electrical and Electronic Equipment (WEEE)**

End-of-life electrical or electronic equipment for the depollution, disassembly, shredding, recovery or preparation for disposal of this waste must meet the EU's WEEE Directive.

**Waste Hierarchy**

A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal

**Waste Local Plan**

A statutory development plan prepared (or saved by the waste planning authority, under transitional arrangements), setting out policies in relation to waste management and related developments

**Waste Management**

Processes by which waste is reused, recycled or recovered. It does not include waste transfer (where waste is sorted and baled) or landfill

**Waste Minimisation / Reduction**

The most desirable way of managing waste, by avoiding the production of waste in the first place

**Waste Planning Authority (WPA)**

The local authority responsible for waste development planning and control. They are unitary authorities, including London Boroughs and the City of London, National Park Authorities, and county councils in two-tier areas

The WPAs for the South London Waste Plan are

- London Borough of Croydon;
- Royal Borough of Kingston;
- London Borough of Merton; and
- London Borough of Sutton

**Waste Regulation Authority**

The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

**Waste Transfer**

Processes by which waste is sorted or baled prior to transfer to another place for reuse, recycling, recovery or disposal. Although in practice, usually some reuse, recycling and recovery occurs in the sorting and baling.

**Waste Treatment**

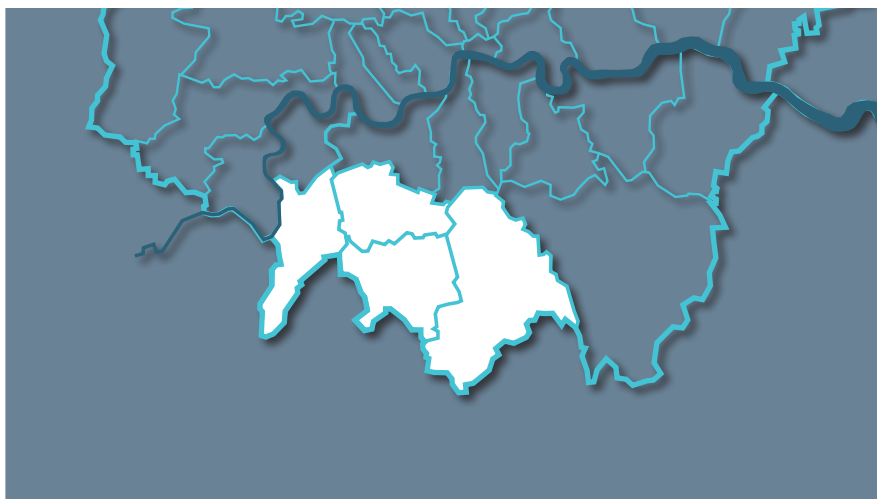
All processes for waste management (see above) and waste transfer (see above)







- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



Sustainability Appraisal (SA)  
 Addendum Report on Proposed Modifications  
 incorporating Strategic Environmental Assessment (SEA)

May 2022

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# 1. Introduction

## Purpose of the new South London Waste Plan

1.1 The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan (SLWP) covering the time period 2022-37. When it is adopted in 2022-23, the new plan will replace the previous SLWP 2011-21<sup>1</sup> introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the New London Plan 2021 up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy, promote the circular economy and minimise any adverse impacts upon on nearby land uses and the local environment.

1.2 A new plan is needed from 2022 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaborative working at the sub-regional level is essential for effective waste planning.

## Stages in the preparation of the draft plan

1.3 Following initial public consultation on Issues and Preferred Options and an accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation<sup>2</sup>), a draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report<sup>3</sup> between 4 September and 22 October 2020 (Regulation 19 consultation<sup>4</sup>). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facilities within the four boroughs over the next 15 years.

1.4 On 19 January 2021, the draft SLWP was submitted to the Secretary of State for Housing, Communities and Local Government for Examination-in-Public (EiP) in line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft plan was accompanied by a number of submission documents, including the SA Report; a Schedule of Main Modifications arising from Regulation 19 consultation; the Sequential Test (flood risk); the Duty to Cooperate Statement; Statement of Consultation, Technical Papers and site appraisals.

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<sup>1</sup> the current South London Waste Plan 2012 is available at <https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view>

<sup>2</sup> under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>3</sup> the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

<sup>4</sup> under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

1.5 Subsequently, in July 2021, five 'matters statements' were prepared as part of a further submission to the EiP together with a schedule of further proposed changes to the plan in order to address each of the matters, issues and questions (MIQs) previously identified by the Inspector. The matters statements covered the following topics:

- Matter 1: Is the Plan legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been discharged?
- Matter 2: Is the Plan in general conformity with the London Plan?
- Matter 3: Does the Plan make adequate provision for the waste management apportionments required by the London Plan and any other arisings, and is it positively prepared in this regard?
- Matter 4: Does the Plan set out an effective suite of policies for the management of waste in the area; and are they justified and consistent with national policy?
- Matter 5: Does the Plan set out effective mechanisms for its implementation and monitoring?

1.6 An SA Addendum Report on Proposed Modifications<sup>5</sup> was prepared in July 2021 in order to assess the impacts of each of the proposed modifications to the SLWP (consisting of the Main Modifications submitted to the Inspector in January 2021 and the further proposed changes arising from the Inspector's MIQs as set out in each of the above matters statements). The SA Addendum Report formed part of the above submission to the EiP.

1.7 Following the EiP Hearing into the draft SLWP, which was held at the Merton Council Chamber between 1-2 September 2021, the Inspectors prepared closing remarks on the outcome of the hearings (2 September 2021) and subsequently a post-hearing letter on 7 September 2021<sup>6</sup> which set out the next steps for preparing and consulting upon the final schedule of Main Modifications.

1.8 Arising from the outcome of the EiP hearing and the Inspectors' recommendations on further changes that may be needed to resolve outstanding issues, the four boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP for public consultation. This shows all material changes made to the draft SLWP compared to the Regulation 19 submission version and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). This SA Addendum Report assesses the likely impact of each of the Main Modifications on the sustainability criteria making up the four Boroughs' SA Framework.

## National planning policy requirements

1.9 The National Planning Policy for Waste<sup>7</sup> (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:

- undertaking early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial;
- driving waste management up the Government's waste hierarchy (see Figure 1.2), recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal;

<sup>5</sup> the SA Addendum Report (Ref: SLWP06) can be viewed at [https://drive.google.com/file/d/1L08\\_94PDI\\_AaZZ22IU\\_kwAlXymjZCsbr/view](https://drive.google.com/file/d/1L08_94PDI_AaZZ22IU_kwAlXymjZCsbr/view)

<sup>6</sup> the Inspectors' Post-Hearing Letter can be viewed at <https://drive.google.com/file/d/1q8USKHZTGYh4hz6XqdGLDQpQ4kphfKkl/view>

<sup>7</sup> the NPPW is available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

- in particular, identifying the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (in London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans);
- considering the need for additional waste management capacity of more than local significance and reflecting any requirement for waste management facilities identified nationally;
- taking into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required;
- working collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management; and
- considering the extent to which the capacity of existing operational facilities would satisfy any identified need.

Figure 1.1: The Waste Hierarchy

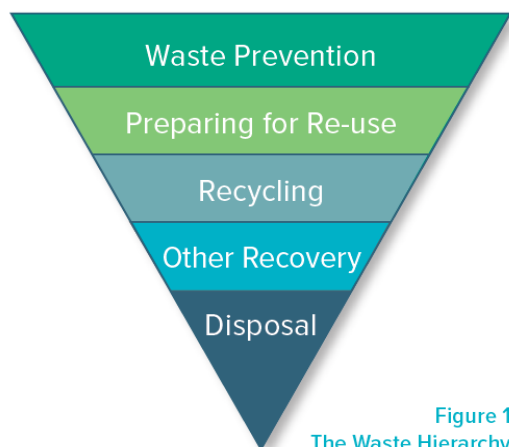


Figure 1  
The Waste Hierarchy

## London Plan Apportionment targets

1.10 The New London Plan<sup>8</sup>, adopted on 2 March 2021, includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):

- the equivalent of 100% of London's waste managed within London (i.e. net self-sufficiency) by 2026 for all waste streams except excavation waste;
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

1.11 New apportionment targets are set for each borough under Policy SI 8 on 'Waste capacity and net waste self-sufficiency' in order to meet the net self-sufficiency target for local authority collected waste (LACW) and for commercial and industrial (C&I) waste. Table 1.1 sets out the combined apportionment targets for South London for 2021 and at the end of the plan period in 2041.

<sup>8</sup> the London Plan 2021 is available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Table 1.1: Apportionment targets for South London in the New London Plan 2021

Borough	Apportionment (tonnes per annum)	
	2021	2041
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
<b>Total</b>	<b>887,000</b>	<b>944,000</b>

## Requirement for Sustainability Appraisal

**1.12** The Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal (SA) in the preparation of all development plan documents (DPDs) forming part of the local development plan, including local waste plans. SAs should incorporate the requirements of the UK Strategic Environmental Assessment (SEA) Regulations 2004, which implement the requirements of the EU SEA Directive 2001/42/EC. The purpose of SA is to ensure a high level of protection of the environment as part of the preparation of certain plans and programmes.

**1.13** SA is integral to the preparation and development of all DPDs, including local waste plans. Its purpose is to promote the aims of sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The relationship between the SA and plan preparation processes is shown in Figure 1.3.

**1.14** SA reports on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development. By identifying key issues, developing policies and proposals and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable plans which are evidence-based. In the context of waste planning, the appraisal process can help planners and the public gain a better understanding of how well-designed waste facilities in the right locations can deliver long-term benefits for local environmental quality, promoting the circular economy and community well-being.

**1.15** To be effective, SA must be

- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- **Objectives-led:** the direction of desired change has measurable targets;
- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

**1.16** The SA process also provides the means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

**1.17** At the conclusion of the plan-making process, the SA Report on the Draft SLWP Regulation 19 Submission version together with the SA Addendum Report on Main Modifications (this report), should describe how the adopted plan has addressed the sustainability agenda and the choices that



have been made between alternative policies and proposals. This will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan.

## SA Scoping Report

**1.18** In order to meet the requirements of the SEA Directive and procedures for community engagement on local plan and SA documents set out in the statutory regulations and respective Statements of Community Involvement (SCI), an initial SA Scoping Report for the new SLWP was published over a five week period from **16 September until 21 October 2019** in order to seek the views of relevant bodies, namely the Environment Agency (EA), Natural England and Historic England, on the proposed scope of the appraisal.

**1.19** Its purpose was to define the scope of the appraisal and provide the basis for appraising the potential effects of alternative waste management policies against a comprehensive range of environmental, social and economic criteria. The sustainability objectives, indicators and targets making up the proposed SA Framework were shaped by the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning policies within each of the four boroughs.

**1.20** Responses to consultation on the SA Scoping Report were received from the Environment Agency (28 October 2019); Historic England (21 October 2019); and Natural England (17 October 2019). and the comments received have been incorporated within this SA Report. All representations received on the SA Scoping Report (and on the subsequent SA Report on SLWP Issues and Preferred Options) and how they have been addressed are set out in Appendix 3.

## SA Report on SLWP Issues and Preferred Options – Reg 18

**1.21** Following extensive evidence gathering work, culminating in the production of a Technical Paper<sup>9</sup> by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report (see above), an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019 (Regulation 18 consultation). Importantly, the Issues and Preferred Options document identified that the four boroughs could meet the combined target for household and C&I waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the C&D waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.

**1.22** The Issues and Preferred Options document was accompanied by a further SA Report (incorporating SEA, EqIA and Habitats Regulations screening)<sup>10</sup>. Its purpose was to assess the likely effects of the 'preferred option' (consisting of the Vision, eight draft policies and 46 existing waste sites proposed to be safeguarded) and strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework.

**1.23** The SA Report concluded that draft Policies WP1-WP8, which were developed by the four partner boroughs as the 'preferred' strategy for the new SLWP (Option 1), would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012

<sup>9</sup> the South London Waste Technical Paper and accompanying Appendices are available at [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

<sup>10</sup> the SA Report on SLWP Issues and preferred Options is available at [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

(Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 were shown to be overwhelmingly negative.

**1.24** A total of 1,155 formal responses were received from 57 respondents on the SLWP Issues and Preferred Options Document and the SA Report. Representations received to the SA Report are set out in Appendix 3 of the subsequent SA Report on the Draft SLWP (Proposed Submission) (see below).

## SA Report on Draft SLWP (Proposed Submission) – Reg 19

**1.25** A draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report<sup>11</sup> and Sequential Test (flood risk) between 4 September and 22 October 2020 (Regulation 19 consultation<sup>12</sup>). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facilities within the four boroughs over the next 15 years.

**1.26** The accompanying SA Report demonstrates that the ten Policies WP1-WP10 proposed for inclusion in the new SLWP 2021-36 (Option 1), are likely to have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

**1.27** While Option 1 essentially carries forward the same overall strategic approach which was identified and assessed as the 'preferred option' in the previous SA Report on Issues and Preferred Options, the SA Matrix demonstrates that the two newly introduced policies (WP8 'Strategic Approach to Other Forms of Waste' and WP10 'Monitoring and Contingencies') and the changes made to Policies WP2 'Strategic Approach to Other Forms of Waste' and WP6 'Sustainable Design and Construction of Waste Facilities' will significantly improve the plan by making a greater contribution to sustainability objectives. Amongst other things, this outcome reflects the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036.

**1.28** Overall, the most important sustainability benefits of the draft SLWP Submission Version include:

- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where

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<sup>11</sup> the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

<sup>12</sup> under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

- appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;
- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
  - 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; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
  - moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery** towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
  - helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and
  - promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

**1.29** A total of 115 representations were received from 47 respondents on the Draft SLWP (Proposed Submission) and the SA Report. A schedule of Main Modifications to the plan was prepared in order to address consultation comments as necessary and this was submitted to the government together with the draft plan on 19 January 2021.

## SA Addendum Report on Proposed Modifications

**1.30** An SA Addendum Report on Proposed Modifications was subsequently prepared in July 2021 in order to assess the likely impacts of each of the Proposed Main Modifications to the draft plan on the environmental, social and economic objectives making up the SA Framework developed for the SLWP. The Proposed Modifications subjected to appraisal consisted of the Main Modifications initially submitted to the Inspector alongside the draft plan on 19 January 2021 (see above) together with the Additional Main Modifications which were proposed subsequently in the light of the Inspector's schedule of matters, issues and questions (MIQs)<sup>13</sup>. The SA Addendum Report on Proposed Modifications was submitted to the Inspector for EiP in July 2021.

<sup>13</sup> the Inspector's Schedule of Matters, Issues and Questions (INSP03) (April 2021) is available at <https://drive.google.com/file/d/13PYU-TX59iM4GNfTz8hGgQgj6dmqNDu/view>

## Final SA Addendum Report on Main Modifications

**1.31** Arising from the outcome of the EiP Hearing from 1-2 September 2021 and the Inspectors' recommendations on further changes that may be needed to resolve outstanding SLWP matters and issues, the the four boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP for public consultation. This shows all material changes made to the draft SLWP compared to the Regulation 19 submission version and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). It also has a new number system. This Final SA Addendum Report on Main Modifications has been prepared for final public consultation in order to assess the likely impact of each of the Main Modifications on the sustainability criteria making up the four Boroughs' SA Framework

**1.32** This Final SA Addendum Report should be read in conjunction with the previous SA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and the subsequent SA Report on Proposed Modifications (July 2021). It is not therefore considered necessary to repeat the following chapters which are contained within the formefr document:

<b>TWO</b>	<b>Background to the South London Waste Plan</b>
<b>THREE</b>	<b>Current Waste Arisings and Capacity in South London</b>
<b>FOUR</b>	<b>Sustainability Appraisal and Strategic Environmental Assessment</b>
<b>FIVE</b>	<b>Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)</b>
<b>SIX</b>	<b>Baseline (Task A2)</b>
<b>SEVEN</b>	<b>Key Sustainability Issues (Task A3)</b>
<b>EIGHT</b>	<b>The Sustainability Appraisal Framework (Task A4)</b>
<b>NINE</b>	<b>Identifying and Assessing Waste Sites (Task A5)</b>
<b>TEN</b>	<b>Developing Proposed SLWP Policies (Task A5)</b>
<b>ELEVEN</b>	<b>Compatibility of the Vision and Objectives with the SA Framework</b>

**1.33** However, the following chapters have been reviewed and amended in this document in order to take account of each of the finalised main modifications to the draft SLWP and to assess their likely impacts on the social, economic and environmental objectives of sustainable development

<b>TWELVE</b>	<b>Appraisal of Main Modifications (Tasks B3, B4 and B5) – see Section 2;</b>
<b>THIRTEEN</b>	<b>Conclusions – see Section 3.</b>

## Equalities Impact Assessment (EqIA)

**1.34** An Equalities Impact Assessment (EqIA) has been prepared on the Main Modifications in line with the relevant statutory requirements and this is available as a separate document.

## 2. Final Appraisal of Main Modifications

### Appraisal Methodology

2.1 The SA Matrix in Table 2.1 sets out the results of appraisal for each of the Main Modifications to the draft South London Waste Plan (SLWP) as set out in the consolidated Main Modifications Schedule. All proposed changes to the Draft SLWP Proposed Submission, which was published at the Regulation 19 consultation stage on 4 September 2020, are indicated through underlined or ~~crossed out~~ text. As before, the scoring system used to indicate the nature and magnitude of impacts is set out in Figure 2.1 below.

Figure 2.1: Scoring system for use in the appraisal

Symbol	Scale of effect
+++	Large beneficial impacts
++	Medium beneficial impacts
+	Smaller beneficial impact
-	Neutral or no impact
x	Smaller negative impact
xx	Large negative effect.
?	Uncertain impact or the nature and magnitude of the impact is subject to the implementation of other policies in the plan.

2.2 It should be noted that many of the Main Modifications to the SLWP are factual in nature and do not involve a material change in policy. These are therefore identified as having 'no significant impacts' for the purpose of the appraisal.

2.3 This appraisal addendum must be read in conjunction with the full SA Report on the Draft SLWP (Proposed Submission) – incorporating the Equalities Impact Assessment (EqIUA), the HRA Screening Report and the Sequential Test - which was published for consultation together with the draft SLWP Proposed Submission on 4 September 2020. This previous SA Report – which also formed part of the formal submission to the Inspector on 19 January 2021 – evaluated and compared the likely impacts of the following three strategic alternatives which were initially identified for the management of South London’s waste over the next 15 years from 2021 to 2036:

- **Option 1 Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP for submission.
- **Option 2 Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged.
- **Option 3 'Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

Option 2 (Existing Plan) was further divided, where relevant, into the following two sub-options, both of which would involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036.

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged; and
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the SLWP 2012 unchanged while identifying new sites in addition to existing safeguarded sites.





SUSTAINABILITY APPRAISAL MATRIX FOR MAIN MODIFICATIONS TO THE SOUTH LONDON WASTE PLAN

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>THE SOUTH LONDON WASTE PLAN – WHAT IT IS</b>															
<p><b>MODIFICATION 1.1 (Post EIP)</b>                      Para 1.1 First Sentence – page 1                      Amend as follows:  <i>"The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2024 2022 to 2036 2037."</i></p> <p><b>NOTES</b>                      To ensure consistency with the NPPF requirement for a 15-year plan period from adoption.</p>															
No significant impacts															
<p><b>MODIFICATION 1 (Post EIP)</b>                      After Para 1.3 – page 1                      Insert:  <i>"Community involvement in local planning matters is an essential part of the planning process. Each of the South London Waste Plan Boroughs has an adopted Statement of Community Involvement (SCI), a document which aims to ensure that all sections of the community understand how they are able to contribute to the planning process. When planning applications are submitted to the Boroughs, including applications involving waste uses, community involvement will be sought in accordance with the relevant Boroughs' SCI."</i></p>															
<div style="display: flex; justify-content: space-around;"> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> <span></span> </div>															
<p><b>NOTES</b>                      • Purpose: To clarify how communities will be involved in future planning applications</p>															
<p><b>COMMENTARY</b>                      By increasing the involvement of the local community as part of the planning process and taking further account of their input and concerns in dealing with waste planning applications, this proposed modification is expected to have:</p> <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities</li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> for (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (12) helping to protect and enhance <b>biodiversity and habitats</b> (13) promoting local employment, <b>South London's economy and the competitiveness of the waste sector</b>;</li> </ul>															

	SA FRAMEWORK OBJECTIVES															
	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
	To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATION 2</b>  <b>Para 2.1 Final Sentence – page 3</b>                      Amend as follows:                      “This South London Waste Plan is the replacement document and covers the period <del>2021</del> <b>2022</b> to <del>2036</del> <b>2037</b> and supersedes the <b>2012 South London Waste Plan. A list of superseded policies is set out in Appendix 5</b>”.</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: To ensure the Plan period is a minimum of 15 years from adoption. To make it clear that the 2012 South London Waste Plan and its Policies is superseded in full.</li> <li>• Inspector’s Preliminary Matter INSP01</li> <li>• Previously Mod 1</li> </ul>	No significant impacts – factual change															
<p><b>MODIFICATION 3</b>  <b>Para 2.11 First Sentence – page 5</b>                      Amend third bullet as follows:  <del>95% of construction, demolition and excavation waste to be recycled by 2020</del> <b>of excavation material to go to beneficial use and 95% of construction and demolition waste for reuse, recycling or recovery. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences, climate change adaption/mitigation or landfill restoration.</b></p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: To improve clarity and to ensure SLWP wording is consistent with the 2021 London Plan and NPPF</li> <li>• Inspector’s Question M3 [iv] 9.</li> <li>• Previously Mod 1.1.</li> </ul>	No significant impacts – factual change															

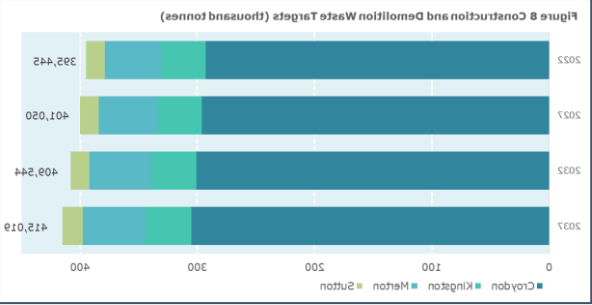
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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve

KEY ISSUES	
<p><b>MODIFICATION 4</b>  <b>Para 3.8 First Sentence – page 10</b>                      Amend as follows:  <i>"The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. <b>Similarly, HCI waste sent to the Redhill Landfill site is due to be managed in Beddington, following the planned closure of the landfill in 2027.</b></i>  <i>Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes. <b>However, the Plan identifies sufficient capacity within the plan area to exceed arisings for construction and demolition waste. The Boroughs will continue to monitor cross-boundary movements of waste through the duty to cooperate."</b></i></p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: To improve clarity on cross-boundary movements of waste and ongoing duty-to-cooperate.</li> <li>• Inspector's Question M3 (iv) 7.</li> <li>• Previously Mod 1.2.</li> </ul>	<p>No significant impacts – factual change</p>

SA FRAMEWORK OBJECTIVES																									
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING													
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION										
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve										
<p><b>MODIFICATION 5</b>                      Para 3.11 - page 12                      Amend as follows:  <i>The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities <u>outside the South London waste plan area</u> which receive South London waste are able to do so in the future. <b>No planning issues have been identified which will prevent the continued cross-boundary movements of waste</b> and the achievement of this task can be seen in the Statements of Cooperation which accompany this plan. <b>The Boroughs will continue to monitor cross-boundary movements of waste and engage with relevant authorities through the duty to cooperate, so any substantial changes can be considered in accordance with Appendix 1 'Monitoring'.</b></i></p>																									
++				++				+																	
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: Duty to Cooperate</li> <li>• Inspector's Question M3 (i) 5.</li> <li>• Previously Mod 1.3</li> </ul>																									
<p><b>COMMENTARY</b></p> <p>By emphasising the SLWP boroughs' shared commitment to monitor cross-boundary waste movements and engage with relevant authorities through the 'duty to cooperate', <b>Proposed Modification 1.x</b> is assessed as having:</p> <ul style="list-style-type: none"> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (1) promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) promoting <b>waste re-use, recycling and recovery</b> within South London. and (4) helping to secure the transition to a <b>circular economy</b>; and</li> <li>• <b>SMALL BENEFICIAL IMPACTS (++)</b> for (9) delivering <b>sustainable transport</b> objectives with the plan area; and (10) helping to <b>minimise air pollution</b> and impacts on sensitive land-uses.</li> </ul>																									
<p><b>MODIFICATION 5.1 (Post EIP)</b>                      Figure 7 - page 13                      Replace Figure 7 with the updated version as follows:</p>																									
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF</li> </ul>																									
<p>Figure 7 Household, Commercial &amp; Industrial Waste Targets (thousand tonnes)</p> <table border="1"> <caption>Figure 7 Household, Commercial &amp; Industrial Waste Targets (thousand tonnes)</caption> <thead> <tr> <th>Year</th> <th>Total Target (thousand tonnes)</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>890,800</td> </tr> <tr> <td>2027</td> <td>904,800</td> </tr> <tr> <td>2032</td> <td>918,800</td> </tr> <tr> <td>2037</td> <td>932,800</td> </tr> </tbody> </table> <p style="text-align: center;">No significant impacts – factual change</p>																Year	Total Target (thousand tonnes)	2022	890,800	2027	904,800	2032	918,800	2037	932,800
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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATION 6</b>                      Para 3.16 First Sentence – page 14  <i>"The London Plan sets a target that <u>in London 95% of excavation waste will go to beneficial use and recycle and reuse 95% of construction and demolition waste will be reused, recycled or recovered-95% of Construction and Demolition Waste by 2020.</u>"</i></p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Previously Mod 1.4.</li> <li>Purpose: To improve clarity and to ensure the wording in the SLWP is consistent with the 2021 London Plan and NPPF.</li> </ul>															
<p><b>MODIFICATION 6.1 (Post EIP)</b>                      Figure 8 – page 14                      Update Figure 8 as follows:</p>  <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF .</li> </ul>															
<p><b>VISION AND OBJECTIVES</b></p> <p><b>MODIFICATION 7A</b>                      Para 4.2 – page 19                      Amend as follows:  <i>"To achieve the vision, the South London Waste Plan has the following objectives, <u>which will be delivered through the policies in the Plan:....</u>"</i></p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: For clarity</li> <li>Previously Mod 1.4.</li> </ul>															

No significant impacts – factual change

No significant impacts – factual change

No significant impacts – for clarity

SA FRAMEWORK OBJECTIVES																
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<b>MODIFICATION 7B</b> Para 4.2 – page 19 Amend as follows: <i>"Objective 1: To plan for net self-sufficiently by Meet the 2019 ItP London Plan meeting the 2021 London Plan target for Household and Commercial and industrial waste.</i> • <i>To be delivered through Policies WPAGE 1, WP3 and WP4."</i>																
<b>NOTES</b> Purpose: To incorporate the core aim of net self-sufficiency Inspector's Question M3 (i) 9. Previously Mod 1.5 pt (a).																
<b>COMMENTARY</b> By incorporating the core aim of achieving net self-sufficiency together with meeting the London Plan 2021 combined apportionment targets for the management of Household and Commercial and Industrial (HCI) waste (Objective 1) and for other forms of waste including Construction and Demolition (C&D), excavation, low level radioactive and agricultural waste, <b>Proposed Modification 1.x</b> is assessed as having: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) promoting <b>net self-sufficiency</b> within South London and (2) promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings); and</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (3) promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) helping to minimise <b>air pollution</b> and impacts on sensitive land-uses; and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b></li> </ul>																
<b>MODIFICATION 7C</b> Para 4.2 – page 19 Amend as follows: <i>"Objective 2: To plan for net self-sufficiently by meeting Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural, where practical or necessary.</i> • <i>To be delivered through Policies WP2, WP3 and WP4."</i>																
<b>NOTES</b> Inspector's Question M3 (i) 9. Previously Mod 1.5.																
<b>COMMENTARY</b> By incorporating the core aim of achieving net self sufficiency together with meeting the London Plan 2021 combined apportionment targets for the management of Household and Commercial and Industrial (HCI) waste (Objective 1) and for other forms of waste including Construction and Demolition (C&D), excavation, low level radioactive and agricultural waste, <b>Proposed Modification 1.x</b> is assessed as having: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London and (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings); and</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS</b> for (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (9) Helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and impacts on sensitive land-uses; and (13) Promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b></li> </ul>																

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<p><b>MODIFICATION 7D</b>                  Para 4.2 – page 19                  Amend as follows:  <i>"Objective 3: Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan.</i>                  • <i>To be delivered through Policies WP3 and WP4."</i></p> <p><b>NOTES</b>                  • Purpose: For clarity.                  • Inspector's Question M3 (i) 9. Previously Mod 1.5b</p>															
<p>No significant impacts – while the proposed modifications to Objectives 3, 5 and 6 help to identify the relevant policies, they do not have a material effect in terms of the likely impacts of the draft plan</p>															
<p><b>MODIFICATION 7E</b>                  Para 4.2 – page 19 Amend:  <i>Objective 4: Ensure there is <b>Support the need for</b> sufficient land for other industrial uses within the South London Waste Plan area's industrial estates <b>by not safeguarding more land for waste management than is required.</b></i>  <i>To be delivered through Policies WPAGE 1, WP2, WP3 and WP4.</i></p> <p><b>NOTES</b>                  • Inspector's Question M3 (i) 9.                  • Previously Mod 1.5c.</p>															
	++												++		
<p><b>COMMENTARY</b>                  By including the aim of not safeguarding more land for waste management than is required as part of Objective 4, <b>this proposed modification</b> is assessed as having:                  • <b>MEDIUM BENEFICIAL IMPACTS</b> in terms of (2) promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings which makes the most efficient use of industrial land; and (13) promoting <b>local employment and South London's economy</b> by ensuring that sufficient land in strategic industrial locations (SILs) and locally significant industrial locations (LSILs) is available for other employment uses</p>															
<p><b>MODIFICATION 7G</b>                  Para 4.2 – page 19  <i>"Objective 6: Ensure the effects of new development are mitigated and, where possible, enhance amenity.</i>                  • <i>To be delivered through Policies WP4, WP5, WP6, WP8 and WP9"</i></p> <p><b>NOTES</b>                  • Purpose: For clarity.                  • Inspector's Question M3 (i) 9.                  • Previously Mod 1.5b</p>															
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<b>MODIFICATION 7H</b> Para 4.2 – page 19 Amend as follows: <i>"Objective 7: To support the movement of waste as far up the waste hierarchy as practicable. To be delivered through Policies WP3 and WP7"</i>	++	++	+++	+++	++				++	++	+		+++	+	+	+
<b>NOTES</b> • Purpose: New objective supporting movement of waste as high up the waste hierarchy as possible Inspector's Question M3 (i) 9. Previously Mod 1.5 (d)	<b>COMMENTARY</b> By including a new SLWP objective supporting the movement of waste as far up the waste hierarchy as practicable, this proposed modification is assessed as having: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London's economy and the competitiveness of the waste sector</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> in terms of (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (5) helping to minimise CO<sub>2</sub> emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area; and (10) helping to minimise air pollution and potential impacts on sensitive land-uses; and</li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> for (11) minimising adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and (16) promoting equalities, accessibility and social inclusion.</li> </ul>															
<b>MODIFICATION 7I</b> Para 4.2 – page 19 Amend as follows: <i>"Objective 8: To deliver waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy. To be delivered through Policies WPAGE 1, WP2, WP3, WP4, WP5 and WP7"</i>	++	+++	+++	+++	++				++	++	++	+	+++	+	+	+
<b>NOTES</b> • Purpose: New objective aimed at applying the proximity principle, supporting co-location and promoting the Circular Economy • Inspector's Question M3 (i) 9. • Previously Mod 1.5e.	<b>COMMENTARY</b> By adding a new SLWP Objective aimed at applying the proximity principle, supporting the co-location of facilities and promoting opportunities for the circular economy, this proposed modification is expected to have: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London's economy and the competitiveness of the waste sector (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London.</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (1) Promoting net self-sufficiency within South London (5) helping to minimise CO<sub>2</sub> emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising adverse impacts arising from construction and operation of waste facilities</li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and (16) promoting equalities, accessibility and social inclusion within South London</li> </ul>															

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<b>MODIFICATION 7J</b> Para 4.2 – page 19 Amend: <i>"Objective 9: To ensure the delivery of sustainable waste development within South London through the integration of social, environmental and economic considerations.</i> • <i>To be delivered through Policies WPAGE 1 to WP9"</i>																																																	
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<b>COMMENTARY</b> By adding a new SLWP objective which seeks to integrate the full range of social, environmental and economic considerations in delivering sustainable waste development in South London, this proposed modification (assuming that the new objective is delivered over the plan period) is expected to have: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b></li> <li>• <b>MEDIUM BENEFICIAL IMPACTS</b> for (5) helping to <b>minimise CO<sub>2</sub> emissions and address the causes of climate change</b> (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> </ul>																																																	
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<b>MODIFICATION 8 (Post EIP)</b> Figure 13 – page 23 Replace Figure 13 with the updated version as follows:																																																	
<table border="1"> <thead> <tr> <th colspan="3">Figure 13 Capacity, Forecast and Surplus for Household and Commercial &amp; Industrial Waste</th> </tr> </thead> <tbody> <tr> <td style="width: 50%;"></td> <td style="width: 30%;"></td> <td style="width: 20%;">South London Capacity (2021) 945,910 tonnes per annum</td> </tr> <tr> <td style="width: 50%;"></td> <td style="width: 30%;"></td> <td style="width: 20%;">South London Forecast (2037) 932,800 tonnes per annum</td> </tr> <tr> <td style="width: 50%;"></td> <td style="width: 30%;"></td> <td style="width: 20%;">South London Surplus 13,110 tonnes per annum</td> </tr> </tbody> </table>																Figure 13 Capacity, Forecast and Surplus for Household and Commercial & Industrial Waste					South London Capacity (2021) 945,910 tonnes per annum			South London Forecast (2037) 932,800 tonnes per annum			South London Surplus 13,110 tonnes per annum																						
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<p><b>MODIFICATION 9 (Post EIP)</b>                      Para 4.2 – page 19                      Amend as follows:</p> <p><i>"As such, the boroughs will not normally support new waste sites coming forward (outside of sites providing compensatory provision, as set out in Policy WP3), unless there are exceptional circumstances that justify it. This strikes a balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, whilst giving some flexibility for new waste sites to be delivered in appropriate circumstances.</i></p> <p><i>Applications outside of safeguarded waste sites will not be supported unless it can be demonstrate that there is a need for such a facility, having regard to the latest Waste Authority Monitoring Report and the ability of the Plan to meet the London Plan apportionment figure. In addition, applicants will need to provide evidence as to why it is not possible to use, expand or intensify an existing safeguarded waste site (as set out on pages 44-91 of this Plan).</i></p> <p><i>Furthermore, applications proposing waste facilities outside of the existing safeguarded sites will not be supported unless it can be demonstrated that the proposed site would be better suited to meeting the identified need for South London having regard to delivering the vision and objectives of the South London Waste Plan. For example, there may be an opportunity to co-locate a recycling facility with a reprocessing plant or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities.</i></p>	+	++++	++++	+	+			+	++++	++++	++		++	++++	++++	++++

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<b>MODIFICATION 9 (continued)</b> <i>There may be instances in the future where advances in waste technologies are such that existing sites do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer. In any event, a new waste site will have to satisfy the locational criteria set out in Policy WP4 (b) to (g). The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."</i>															
+	+++	+++	+	+			+	+++	+++	++		++	+++	+++	+++
<b>NOTES</b> • Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective															
<b>COMMENTARY</b> By optimising the provision of waste management facilities across the plan area, avoiding the development of additional waste facilities outside of safeguarded sites that are not needed to meet the apportionment, and in order, promoting co-location and striking a sustainable balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, this proposed modification is expected to have: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (2) promoting an environmentally sustainable strategic approach to managing South London’s waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London(9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses(14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment (15)</b> Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and(16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities, and (13) promoting local employment, South London’s economy and the competitiveness of the waste sector.</b></li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (4) helping to secure the transition to a <b>circular economy(5) helping to minimise CO<sub>2</sub> emissions and address the causes of climate change, and (8) helping to promote the highest standards of sustainable design and construction</b> in new or upgraded waste facilities</li> </ul>															

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<p><b>MODIFICATION 10 (Post EIP)</b>                      Policy WP1 – page 23                      Amend Policy WP1 as follows  <i>"WP1 Strategic Approach to Household and Commercial and Industrial Waste</i>                      (a) The boroughs.....                      (b) .....the SLWP will seek to meet the 2019 IEP 2021 London Plan apportionment target ...to 2036 2037                      (c) The boroughs .....                      (d) New waste sites (either for transfer or management) will not <b>normally</b> be permitted, unless; they are for compensatory provision (see WP2); <del>or they are for compensatory provision (in accordance with Policy WP4); or</del>                      (e) there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and                      (f) there is robust evidence that existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and                      (iii) they would manage waste as high up the waste hierarchy as practicable; and                      (iv) they would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan</p>																
++	+++	+++	++	+	+	+	+	+++	+++	++	+	+	+++	+++	+++	
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To ensure the policy is consistent with national policy and is justified and positively prepared.</li> </ul>																
<p><b>COMMENTARY</b></p> <p>By optimising the provision of waste management facilities across the plan area, avoiding the development of additional facilities for HC&amp;I waste outside of safeguarded sites that are not needed to meet the apportionment, and in order, promoting co-location and striking a sustainable balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, this proposed modification is expected to have:.</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (2) promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London(9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) minimising <b>air pollution</b> and potential impacts on sensitive land-uses arising from any new waste facilities outside of safeguarded sites (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and(16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for(1) promoting <b>net self-sufficiency</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (11) minimising the <b>adverse impacts arising from the construction and operation of new waste facilities</b>, and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b>.</li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for (5) <b>minimising CO<sub>2</sub> emissions and address the causes of climate change</b> (6) helping to ensure that any new waste management facilities outside of safeguarded sites are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to</b> and from any new waste developments outside of safeguarded sites (8) promoting the highest standards of <b>sustainable design and construction</b> in any new waste facilities outside of safeguarded sites (12) helping to protect and enhance <b>biodiversity and habitats</b></li> </ul>																

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<b>WP2 STRATEGIC APPROACH TO OTHER FORMS OF WASTE</b>																																	
<p><b>MODIFICATION 10.1 (Post EIP)</b> Figure 14 – page 24 Updte Figure 14 as follows:</p> <table border="1"> <thead> <tr> <th>Borough</th> <th>2022 Arisings</th> <th>2037 Arisings</th> </tr> </thead> <tbody> <tr> <td>Croydon</td> <td>293,381</td> <td>305,058</td> </tr> <tr> <td>Kingston</td> <td>37,966</td> <td>39,040</td> </tr> <tr> <td>Merton</td> <td>48,391</td> <td>54,314</td> </tr> <tr> <td>Sutton</td> <td>15,707</td> <td>16,607</td> </tr> <tr> <td><b>Total</b></td> <td><b>395,445</b></td> <td><b>415,019</b></td> </tr> </tbody> </table> <p><b>NOTES</b> • Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP</p>																Borough	2022 Arisings	2037 Arisings	Croydon	293,381	305,058	Kingston	37,966	39,040	Merton	48,391	54,314	Sutton	15,707	16,607	<b>Total</b>	<b>395,445</b>	<b>415,019</b>
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<p><b>MODIFICATION 11</b> Figure 15 – page 24</p> <p><b>NOTES</b> Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP.</p> <p><b>Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste</b></p> <p>South London Capacity (2021) 568,162 tonnes per annum</p> <p>South London Forecast (2037) 415,019 tonnes per annum</p> <p>South London Surplus 153,173 tonnes per annum</p>																																	
<p><b>MODIFICATION 12 (Post EIP)</b> Para 5.17 after last sentence – p26 Add new sentence as follows: <i>"As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify it, as set out in Policy WP2 (e)."</i></p>																																	
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<b>MODIFICATION 13 (Post EIP)</b> Para 5.18 after last sentence –p 26 Add new sentence as follows: <i>"... Given the relatively small tonnage of this waste, the fact that it can be mixed with C&amp;I Waste and C&amp;D Waste and that it is often dealt with by C&amp;I and C&amp;D waste facilities, there is no need for the SLWP boroughs to provide for this waste stream, unless exceptional circumstances would justify this type of development, as set out in Policy WP2 (e)"</i>															
	+							+	+	+	+		+	+	
<b>NOTES</b> Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective.															
<b>COMMENTARY</b> By not supporting the development of additional waste sites and/or additional capacity to manage agricultural waste arisings, this proposed modification is expected to have:															
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<b>COMMENTARY</b> By ensuring that new sites are not developed for the management of hazardous waste arisings within the plan area, except where there are exceptional circumstances that justify if (see amended Policy WP2), this proposed modification is expected to have:															
<ul style="list-style-type: none"> <li>(VERY) SMALL BENEFICIAL IMPACTS (+) for ((2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London’s waste arisings – including hazardous waste (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) minimising <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (13) promoting <b>local employment, South London’s economy and the competitiveness of the waste sector</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) minimising potentially adverse effects on <b>human health and the open environment</b>; and (16) promoting <b>equalities, accessibility and social inclusion</b> within South London</li> </ul>															



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<p><b>MODIFICATION 14.1 (Post EIP)</b>                      Figure 16 – page 27                      Replace Figure 16 with the updated version below:</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF and to ensure consistency within the SLWP.</li> </ul>																																																											
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<p><b>MODIFICATION 15 (Post EIP)</b>                      After Para 5.21 – page 28                      Insert new paragraph as follows:  <i>The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational.</i></p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective</li> </ul>																																																											
<p><b>COMMENTARY</b></p> <p>By keeping waste management throughput and capacity under annual review and safeguarding any new waste sites via the Waste AMR, this proposed modification is expected to have:.</p> <ul style="list-style-type: none"> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London’s waste arisings (4) helping to secure the transition to a <b>circular economy</b> (13) promoting <b>local employment, South London’s economy and the competitiveness of the waste sector</b></li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for (3) promoting <b>waste re-use, recycling and recovery</b> within South London</li> </ul>																																																											

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(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATION 16 (Post EIP – partly)</b>                      Policy WP2 – page 28                      Amend Policy WP2 as follows:                      "WP2 Strategic Approach to Other Forms of Waste                      (a) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&amp;D waste of managing 415,019 tpa within their boundaries across the plan period to 2036 2037. ....                      (b) New sites (either transfer or management) will not <u>normally</u> be supported for <b>Construction and Demolition Waste</b>, Radioactive Waste, Agricultural Waste and Hazardous Waste, <u>unless:</u>                      (i) <u>They are for compensatory provision (in accordance with Policy WP4); or</u>                      (ii) <u>there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and</u>                      (iii) <u>there is robust evidence that existing safeguarded sites within the SLWP area are not available or suitable, or that needs cannot be met through the adaption or intensification of existing facilities; and</u>                      (iv) <u>they would manage waste as high up the waste hierarchy as practicable; and</u>                      (v) <u>they would accord with all relevant aims and policies of the SLWP (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan.</u>                      (Former parts (c) and (d) 'renumbered' as parts (d) and (e): Previously Mod 1.6)</p>															
<p>Page 500</p>															
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<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>To ensure the policy is consistent with national policy and is justified and positively prepared.</li> <li>Previously Mod 1.6 (in part)</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By optimising the provision of waste management facilities across the plan area, avoiding the development of additional facilities for C&amp;D and other forms of waste outside of safeguarded sites that are not needed to meet the apportionment, and by promoting co-location and striking a sustainable balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, this proposed modification is expected to have:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (2) promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) minimising <b>air pollution</b> and potential impacts on sensitive land-uses arising from any new waste facilities outside of safeguarded sites (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and</li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (1) promoting <b>net self-sufficiency</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (11) minimising the <b>adverse impacts arising from the construction and operation of new waste facilities</b>, and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b>, and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for (5) <b>minimising CO<sub>2</sub> emissions and address the causes of climate change</b> (6) helping to ensure that any new waste management facilities outside of safeguarded sites are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to</b> and from any new waste developments outside of safeguarded sites (8) promoting the highest standards of <b>sustainable design and construction</b> in any new waste facilities outside of safeguarded sites (12) helping to protect and enhance <b>biodiversity and habitats</b></li> </ul>															

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To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve

**WP3 SAFEGUARDING OF EXISTING WASTE SITES**

**MODIFICATION 17**  
**Para 5.24 – page 29**  
 Amend paragraph as follows:  
*"In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. This includes intensification or redevelopment to provide compensatory provision."*

**NOTES**  
 Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered  
 • Inspector’s Question M3 (vi) 11.  
 • Previously Mod 1.7

**No significant impacts –**

This modification has been proposed in order to clarify that the intensification of uses will be allowed not only on safeguarded waste sites, but as part of redevelopment to provide compensatory provision. However this does not constitute a material change in policy.

**MODIFICATION 18**  
**Para 5.24 – page 29**  
 Amend paragraph as follows:  
*"Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the relevant policies in a borough’s Development Plan."*

**NOTES**  
 Purpose: Contributes to consistency, clarity and/or correct errors  
 • Inspector’s Question M4 (vii) 1.  
 • Previously Mod 1.8

**No significant impacts –**

This modification has been proposed for purposes of clarity

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<p><b>MODIFICATION 19 (Post EIP)</b>  <b>Para 5.25 Second Sentence and after Para 5.25 – page 29</b>                      Add new sentence to end of Para 5.25 and insert new paras as follows:  <i>"The <del>2019</del> <b>2021</b> London Plan states "waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed" (paragraph 9.9.2). <b>The Environment Agency's Waste Data Interrogator should be used when assessing the maximum throughput achieved over the last five years.</b></i>  <i>Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for a non-waste use. This could be through the intensification of an existing safeguarded waste site or a compensatory site of a suitable size to meet at least the maximum annual throughput, subject to the requirements of Policy WP4. Boroughs will use conditions or legal agreements to satisfy themselves that compensatory capacity will be delivered before a safeguarded waste site is released to another use.</i></p>															
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<p><b>MODIFICATION 19 (continued)</b></p> <p><i>In accordance with Policy SI 9 of the 2021 London Plan compensatory capacity should be provided within London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses without the provision of compensatory provision.</i></p> <p><i>The evidence base supporting the economic policies in the 2019-2021 London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses.....To help achieve a balance between ensuring there is sufficient waste management capacity in the South London Waste Plan area, whilst not stifling other land uses that are in high demand, compensatory provision from other London Boroughs will not normally be supported, unless the criteria in Policy WP3 can be met."</i></p>															
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<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>To ensure the policy is consistent with national policy and is justified and positively prepared.</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By ensuring that replacement capacity is secured before permission is granted for a non-waste use while achieving a balance between having sufficient waste management capacity in the plan area, whilst not stifling other land uses that are in high demand (e.g. through intensification of an existing safeguarded waste site or a compensatory site of a suitable size), this proposed modification is expected to have:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) promoting <b>net self-sufficiency</b> within South London and (2) promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings), and (9) helping to deliver <b>sustainable transport</b> objectives with the plan area</li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (5) helping to minimise CO<sub>2</sub> emissions and address the causes of climate change, and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b></li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for(10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses</li> </ul>															



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<p><b>MODIFICATION 20 (Post EIP)</b>                      Policy WP3 – page 30                      "WP3 Existing Waste Sites Safeguarding Compensatory Provision                      (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis at least meeting the equivalent of maximum achievable throughput of the site being lost. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Waste AMR and the compensatory sites will be safeguarded for waste sites only.                      (d) Compensatory provision for the loss of a waste site from outside the South London Waste Plan area will not normally be permitted, unless there is robust evidence that:                      (i) the compensatory provision is required for London to manage its waste sustainably and achieve net self-sufficiency; and                      (ii) there are no available or suitable sites within the borough or waste planning area where the waste site will be lost; and                      (iii) existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and                      (iv) it would manage waste as high up the waste hierarchy as practicable; and                      (v) it would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan.</p>															
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<b>MODIFICATION 22</b> Policy WP4 parts (a) and (b) – p31 Amend as follows: <i>"Policy WP4</i> <i>Proposals for new waste sites or development of existing safeguarded sites to provide compensatory provision should:</i> <i>(a) Demonstrate that the site is capable of providing sufficient compensatory capacity at least the equivalent of maximum achievable throughput of the site being lost.</i> <i>(b) Be Located on sites:</i> <i>(i) Safeguarded for waste, including waste transfer stations, or within Strategic Industrial Locations or Locally Significant Industrial Locations;"</i>																
+++	+++	++	++					++	++	+	+		+	+	+	
<b>NOTES</b> • Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered and how much, and to ensure consistency with the 2021 London Plan and national policy; • Inspector’s Question M2(i) 4; • Previously Mods 1.11a and 1.11b																
<b>COMMENTARY</b> By amending Policy WP4 in order to (a) require proposals for compensatory provision, either on new sites or existing safeguarded sites, to demonstrate that the site is capable of providing at least the equivalent of maximum achievable throughput of the site being lost and (b) ensuring that they are located on sites ‘safeguarded for waste, including waste transfer stations’ or within Strategic Industrial Locations or Locally Significant Industrial Locations, Proposed Modification 22 is expected to have:																
<ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London and (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London’s waste arisings)</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (9) helping to deliver <b>sustainable transport</b> objectives with the plan area, and (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-use</li> <li>• <b>SMALL BENEFICIAL IMPACTS</b> for (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> </ul>																
<b>MODIFICATION 23</b> Policy WP4 parts (d)(i) & (v) – p31 "(d) (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or MOL); (v) not within the Green Belt or Metropolitan Open Land"																
									+	+	+		+	+	+	+
<b>NOTES</b> • Purpose: clarity and ensure consistency with national policy; • Inspector’s Question M4(i) 3; • Previously Mods 1.12																
<b>COMMENTARY</b> By ensuring that all proposals for compensatory waste provision result in waste being managed at least to the same level in the waste hierarchy as the site being lost, this proposed modification is assessed as having:																
<ul style="list-style-type: none"> <li>• <b>SMALL BENEFICIAL IMPACTS</b> for (10) helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising impacts on the quality of <b>townscape and visual amenity</b> (15) minimising potentially adverse effects on <b>human health and the open environment</b>; and (16) promoting <b>equalities, accessibility and social inclusion</b>.</li> </ul>																

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To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>MODIFICATION 24</b> Policy WP4 parts (f) and (h) – page 31 Amend as follows: <i>"(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost.</i> <i>(h) Meet the other policies of the relevant borough's Development Plan."</i>															
++	++	+++	+++	++				++	++	+		+++	+	+	+
<b>NOTES</b> Purpose: To ensure consistency with London Plan policy; in response to Inspector's Question M2(i); and Previously Mods 1.13 By ensuring that all proposals for compensatory waste provision result in waste being managed at least to the same level in the waste hierarchy as the site being lost, this proposed modification is assessed as having: • <b>LARGE BENEFICIAL IMPACTS (++)</b> for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London's economy and the competitiveness of the waste sector • <b>MEDIUM BENEFICIAL IMPACTS</b> in terms of (1) Promoting net self-sufficiency (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (5) minimising CO <sub>2</sub> emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area; and (10) helping to minimise air pollution and potential impacts on sensitive land-uses; and • <b>SMALL BENEFICIAL IMPACTS</b> for (11) minimising impacts from construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion															
<b>MODIFICATION 25</b> Policy WP4 – page 31 Consolidated changes to Policy WP4 for reference: (see above) See respective appraisal outcomes for Modifications 22, 23 and 24 above															
<b>WP5 PROTECTING AND ENHANCING AMENITY</b>															
<b>MODIFICATION 26</b> Policy WP5 part (a) – page 33 (a) Developments for compensatory or intensified waste facilities should contribute positively to the character and quality of the area and ensure that any potential adverse impacts of the development are designed and managed to mitigate any achieve levels that will not significantly adversely affect are appropriately mitigated.															
				+	++	+	++	+	+	+	++		+++	+++	+++
<b>NOTES</b> Purpose: To ensure consistency with national policy; in response to Inspector's Question M4(i) 6; and Previously Mods 1.14 <b>COMMENTARY</b> By including a furtherrequirement for developments for compensatory or intensified waste facilities to contribute positively to the character and quality of the area, this proposed modification is assessed as having: • <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London. • <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities; and (12) helping to protect and enhance biodiversity and habitats. • <b>SMALL BENEFICIAL IMPACTS (+)</b> for (5) helping to minimise CO <sub>2</sub> emissions and address the causes of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising impacts arising from construction and operation															



SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINBLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRON-MENTAL PROTECTION	(12) BIODIVER-SITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment , & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATION 27</b>                      WP5 pts (c)(iii) &amp; (c)(iv) p33                      "Policy WP5                      (c) (iii) <i>Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals, and residential areas. Heritage Assets and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</i>                      (iv) <i>sensitive receptors, such as schools, hospitals and residential areas;</i>"</p>															
<p><b>NOTES</b>                      Purpose: To ensure consistency with national policy;                      • in response to Inspector's Question M4(i) 5; and                      • Previously Mods 1.15</p>															
<p><b>COMMENTARY</b>                      By strengthening Policy WP5 to ensure that all waste proposals have particular regard to conserving and where practicable, enhancing those elements which contribute to their significance, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b>; and</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> </ul>															
										++			+++	++	++



SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>MODIFICATION 28</b> Policy WP5 part (c)(v) – page 33 Amend as follows: <i>"Policy WP5</i> <i>(c) (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</i> <i>(c) (v) Air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances; Potential impacts within Air Quality Focus Areas, Air Quality Management Areas and/or the Mayor's expanded Ultra Low Emission Zone (ULEZ); Cumulative impacts with other waste sites; the London Plan requirement for development proposals to be at least 'Air Quality Neutral'; and the use of design solutions to prevent or minimise increased exposure of people and in particular vulnerable individuals to poor air quality."</i>															
	++		+++	++				+++	++++	+++	++			+++	+++
<b>NOTES</b> <ul style="list-style-type: none"> <li>Purpose: To improve clarity over air quality requirements and ensure consistency with national policy;</li> <li>Previously Mods 1.16</li> </ul>															
<b>COMMENTARY</b> By providing details of the full range of air quality considerations that must be taken into account for all new or intensified waste developments, including vehicle movements, national air quality objectives, the Mayor's ULEZ; cumulative impacts with other waste sites and the London Plan requirement for 'Air Quality Neutrality', <b>this proposed modification</b> is assessed as having: <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (4) helping to secure the transition to a <b>circular economy</b> (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings (5) helping to minimise CO<sub>2</sub> emissions and address the causes of <b>climate change</b>; and (12) helping to protect and enhance <b>biodiversity and habitats</b>.</li> </ul>															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<b>MODIFICATION 29</b> Policy WP5 (vii), (viii) & (ix) – p 33 <i>(vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;</i> <i>(viii) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials</i> <i>(ix) The safety and security of the site."</i>															
				+				+++	+++	++			+++	+++	+++
<b>NOTES</b> Purpose: To strengthen the links between the Plan policies and the monitoring framework. • in response to Inspector's Question M4(i) 4; and • Previously Mods 1.17 By providing details of the full range of air quality considerations that must be taken into account for all new or intensified waste developments, including vehicle movements, national air quality objectives, the Mayor's ULEZ; cumulative impacts with other waste sites and the London Plan requirement for 'Air Quality Neutrality', <b>this proposed modification</b> is assessed as having: • <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b> ; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London • <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> • <b>SMALL BENEFICIAL EFFECTS (+)</b> for (5) helping to minimise CO <sub>2</sub> emissions and address the causes of climate change															
<b>MODIFICATION 30</b> Policy WP5 final sentence – p 33 Amend as follows: <i>"The information in the schedule below will provide the basis for the assessment of the impact of a development and should therefore be considered as part of any pre-application engagement."</i>															
				+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++
<b>NOTES</b> Purpose: To strengthen the links between the Plan policies and the monitoring framework; • in response to Inspector's Question M4(i) 13; and • Previously Mods 1.18. <b>COMMENTARY</b> By ensuring that all supporting information referred to in the Schedule attached to Policy WP5 is considered at an early stage in the design process through pre-application engagement, <b>this proposed modification</b> is assessed as having: • <b>LARGE BENEFICIAL IMPACTS (++)</b> for (5) helping to minimise CO <sub>2</sub> emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b> ; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London															
<b>MODIFICATION 31</b> Policy WP5 – p33 Consolidated changes to WP5 See respective appraisal outcomes for Modifications 26, 27, 28 and 29 above															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATION 32</b>                      Policy WP5 Schedule part 22 – page 34                      22. Air Quality <del>Impact</del> Assessment, <del>demonstrating setting out</del> the effects on air quality in the locality of the <u>proposed development site</u> arising from <u>approved construction works, on-site waste operations and associated vehicle movements, the operation of the site and vehicles movement to and from it.</u> In line with London Plan Policy SI 1 on 'Improving Air Quality' and the relevant Local Plan policies, Air Quality Assessments must demonstrate that proposed developments:</p> <ul style="list-style-type: none"> <li>are at least 'Air Quality Neutral' having regard to the latest available Mayoral guidance on neutral and air quality positive approaches; promote opportunities to deliver further improvements to air quality and do not conflict with ongoing London-wide or borough level activities aimed at reducing air pollution</li> <li>do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; delay the date at which compliance will be achieved in areas that are currently in exceedance of national air quality objectives; or create an unacceptable risk of high ... exposure to poor air quality;</li> <li>have assessed the cumulative impacts of multiple air pollution sources from the new development, for example, the on-site waste operations and associated vehicle movements, in combination with similar a pollution impacts from approved and proposed development, as advised by the council's Air Quality Officer;</li> <li>incorporate design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, including, but not limited to, children, people in poor health and the elderly; and</li> <li>incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions.</li> </ul>															
	++		+++	++				+++	+++	+++	++			+++	+++
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To improve clarity over air quality requirements, ensure consistency with national policy and strengthen links to the monitoring framework; and</li> <li>Previously Mod 1.19</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By providing further details of the content and minimum requirements of Air Quality Assessments, on air quality neutrality, potential conflict with borough or Mayoral activities, avoiding the creation of new areas that exceed national air quality objectives, incorporating design solutions to prevent or minimise exposure for vulnerable groups; and the need to-incorporate arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions, <b>this proposed modification</b> is assessed as having:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (++)</b> for (9) helping to deliver <b>sustainable transport</b> objectives (10) minimising <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) Helping to minimise adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b>.</li> <li><b>MEDIUM BENEFICIAL IMPACTS (+)</b> for (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings (5) helping to minimise CO<sub>2</sub> emissions and address the causes of climate change; and (12) helping to protect and enhance <b>biodiversity and habitats</b></li> </ul>															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
<p><b>MODIFICATION 33</b>                      Policy WP5 Schedule pts 30-35 – p 34                      • 30 Measures for protecting Public Rights of Way                      • 31 Transport Assessment, which may address measures such as highway safety, protecting Public Rights of Way and an access strategy                      • 32 Travel Plan-Transport Management Strategies such as a Delivery Servicing Plan/Freight Plan, a Route Management Strategy, a Construction Logistics Plan and a Travel Plan.                      32 Route Management Strategy                      33 Access Strategy                      34 Delvry Servicing Plan/Freight Plan                      35 Construction Logistics Plan                      36 Highway safety measures</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: To improve the clarity of the SLWP</li> <li>• Inspector’s Question M4 (i) 11; and</li> <li>• Previously Mod 1.20</li> </ul>															
<p>No significant impacts –                      This modification does not constitute a material change in policy</p>															
<p><b>POLICY WP6: SUSTAINABLE CONSTRUCTION AND DESIGN OF WASTE FACILITIES</b></p> <p><b>MODIFICATION 34 (Post EIP)</b>                      Para 5.36 – page 36                      Amend paragraph as follows:  <i>"5.36-In responding to the 'climate emergency' and the transition to a zero carbon economy within the South London Waste Plan area, all proposed waste facility developments should seek to achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials. As a minimum, all major waste proposals will be required to deliver net zero carbon standards in line with London Plan Policy S12 through application of the Mayor's energy hierarchy: (continued overleaf)</i></p>															
		+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+	+	+++	+++



SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>MODIFICATION 34 (continued)</b> <i>(i) be lean: use less energy and manage demand during operation (ii) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly (iii) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site (iv) be seen: monitor, verify and report on energy performance. A minimum 35% reduction beyond Part L 2013 must be achieved on site for both major and minor proposals. Any shortfall in emissions reductions must then be addressed through a financial contribution to the relevant borough's Carbon offset fund.</i> "A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation." "Designing Waste Facilities – A Guide to Modern Design in Waste" (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy 512 of the 2020 London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change															
		+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+	+	+++	+++
<b>NOTES</b> <ul style="list-style-type: none"> <li>• Post Examination Modification;</li> <li>• Purpose: To improve clarity and ensure consistency with London Plan policy</li> </ul>															
<b>COMMENTARY</b> By ensuring that waste developments achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials, this proposed modification is expected to have: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (5) helping to minimise CO<sub>2</sub> emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London.</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (12) helping to protect and enhance biodiversity and habitats</li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> (13) promoting local employment, South London's economy and the competitiveness of the waste sector and (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment</li> </ul>															





SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>MODIFICATION 36 (continued)</b> <ul style="list-style-type: none"> <li><i>Flood Risk. Dealing with the increased frequency and severity of storm events resulting from climate change by incorporating sustainable urban design (SuDS) measures such as filter strips, permeable paving soakaways and green roofs as part of the design and layout. All waste proposals must achieve greenfield run off rates and volumes in the 1 in 100 year storm event plus climate change in line with part B of London Plan Policy SI 13:- Flood Readiness. Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas.</i></li> <li><i>Odours. Dealing with odour issues which are exacerbated with higher temperatures by avoiding the use of unenclosed waste facilities will become particularly vulnerable to odour issues."</i></li> </ul>															
					+++	+++	+++		++	+++	++		+	+++	+++
<b>NOTES</b> <ul style="list-style-type: none"> <li>Post Examination Modification;</li> <li>Purpose: To improve clarity and ensure consistency with London Plan policy</li> </ul>															
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<p><b>MODIFICATION 37</b>                      Para 5.41 (now 5.42) – page 36                      Amend as follows:  <i>"5.41 5.42 Therefore in accordance with national and regional advice, the 201921 LPP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:"</i></p> <p><b>NOTES</b>                      Purpose: To improve clarity and consistency with London Plan Previously Mod.1.24</p>															
<p style="text-align: center;"><b>No significant impacts –                      This modification does not constitute a material change in policy</b></p>															
<p><b>MODIFICATION 38</b>                      Para 5.40 First Sentence – p37                      Amend as follows:  <i>"In the construction phase of any development, consideration should be given to Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. <u>It is also an opportunity to promote and contribute towards the London Plan target of 95% of excavation material going to beneficial use and 95% of construction and demolition waste being reused, recycled or recovered.</u>"</i></p> <p><b>NOTES</b>                      • Purpose: To improve clarity and to ensure SLWP is consistent with the London Plan and NPPF                      • Previously Mod.1.26</p>															
<p style="text-align: center;"><b>No significant impacts –                      This modification is factual and does not constitute a material change in policy</b></p>															

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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
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<b>MODIFICATION 39</b> Policy WP6 part (b) – page 37 (b) Waste facilities will be required to: (v) minimise waste and promote sustainable management of construction waste <del>the beneficial use of excavation waste and the reuse, recycling or recovery of construction and demolition waste on site;</del> and															
This proposed modification is assessed as having:															
• <b>LARGE BENEFICIAL IMPACTS (++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London’s waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> ; and (13) promoting <b>local employment, South London’s economy and the competitiveness of the waste sector</b> (5) helping to minimise CO <sub>2</sub> emissions and address the causes of climate change and (13)) promoting <b>local employment, South London’s economy and the competitiveness of the waste sector</b>															
<b>NOTES</b> • Purpose: To improve clarity and to ensure the SLWP is consistent with the 2021 London Plan and NPPF Previously Mod.1.27															
<b>COMMENTARY</b>															

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<b>POLICY WP7: THE BENEFITS OF WASTE</b>															
<p><b>MODIFICATION 40 (Post EIP)</b>                      Para 5.44 last sentence – page 38                      Amend as follows:  <i>"Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted. Notwithstanding this, the Mayor's London Plan sets out a number of benefits from waste that should be encouraged when development proposals are brought forward. Therefore, in accordance with London Plan Policy SI 8 Part D, the South London Waste Plan Boroughs will support schemes that also propose additional benefits alongside waste operations."</i></p>															
+++	+++	+++	+++	+++			+++		++			+++		+	+
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Post Examination Modification</li> <li>• Purpose: To improve clarity and ensure consistency with London Plan policy</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By encouraging waste proposals which deliver a range of benefits for the circular economy, reducing life-cycle carbon impacts and other environmental sustainability objectives, such as delivering complementary waste management and secondary material processing facilities on a single site; support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets; and contributing towards renewable/ efficient energy generation, this modification is expected to have:</p> <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (5) helping to <b>minimise CO<sub>2</sub> emissions and address the causes of climate change</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities, and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b></li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses</li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> for (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and(16) promoting <b>equalities, accessibility and social inclusion</b> within South London.</li> </ul>															



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<p><b>MODIFICATION 41 (Post EIP)</b>                      Policy WP7 – page 38                      Amend as follows:</p> <p><i>"WP7 The Benefits of Waste</i>                      Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.</p> <p><i>Waste development for additional Energy from Waste facilities will not that can deliver additional benefits, as set out in London Plan Policy SI 8 Part 3, Points 3 and 4, will be supported encouraged.</i></p> <p><i>Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.</i></p>															
+++	+++	+++	+++	+++			+++		++			+++		+	+
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Post Examination Modification</li> <li>Purpose: To improve clarity and ensure consistency with London Plan policy.</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By encouraging waste proposals which deliver a range of benefits for the circular economy, reducing life-cycle carbon impacts and other environmental sustainability objectives, such as delivering complementary waste management and secondary material processing facilities on a single site; support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets; and contributing towards renewable/ efficient energy generation, this modification is expected to have:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b> (5) helping to <b>minimise CO<sub>2</sub> emissions and address the causes of climate change</b> (8) promoting the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities, and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b></li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses</li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and(16) promoting <b>equalities, accessibility and social inclusion</b> in South London.</li> </ul>															

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<b>POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES</b>															
<p><b>MODIFICATION 42</b>                      Policy WP8 – page 39                      Amend as follows:                      "WP8 New Development Affecting Waste Sites                      New development should be designed to ensure that existing, <u>consented or safeguarded</u> waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.                      Where new development is proposed that may be affected by an existing, <u>consented or safeguarded</u> waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:                      (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision;                      (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligation;                      (iii) <u>Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust.</u>"</p>															
<div style="display: flex; justify-content: space-between;"> <span>++</span> <span>++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> </div>															
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To improve clarity and consistency within the SLWP</li> <li>Previously Mod.2 (with minor changes)</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By requiring early engagement with waste site operators in cases where new development is proposed that may be affected by an existing, consented or safeguarded waste site in order to gain a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (10) minimising <b>air pollution</b> and potential impacts on sensitive land-uses from existing waste sites (11) minimising the <b>adverse impacts arising from the operation of existing waste facilities</b> (15) minimising the potential adverse effects on <b>human health arising from the operation of existing waste</b>.</li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (1) promoting <b>net self-sufficiency</b> within South London (8) promoting the highest standards of <b>sustainable design and construction</b> in new developments in the vicinity of existing waste sites; and (16) helping to promote <b>equalities, accessibility and social inclusion</b>.</li> </ul>															



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<b>POLICY WP9: PLANNING OBLIGATIONS</b>															
<p><b>MODIFICATION 44</b>                      Policy WP9 – page 40                      Amend as follows:  <i>"Policy WP9 Planning Obligations Planning obligations will be used to ensure that all new Waste development or waste redevelopment must ensure that where these have off-site impacts, these are addressed to make the development acceptable provide that these are mitigated meets on and off site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development."</i></p> <p style="text-align: center;"><b>No significant impacts –</b>                      Clarification of the approach to planning obligations as set out in planning legislation and national policy</p> <p><b>NOTES</b>                      • Purpose: consistency with NPPF                      • Previously Mod.2.1</p>															
<b>POLICY WP10 MONITORING AND CONTINGENCIES</b>															
<p><b>MODIFICATION 45</b>                      Para 5.54– page 41  <i>"The South London Waste Plan boroughs recognise that on-going plan monitoring and review are essential to:</i>                      • <i>delivering objectives of the plan;</i>                      • <i>assessing the implementation of the strategic policies;</i>                      • <i>analysing the effectiveness of policies; and</i>                      • <i>analysing waste planning permissions and compliance with planning conditions and obligations."</i></p>															
<div style="background-color: #4F81BD; color: white; padding: 10px; display: flex; justify-content: space-around;"> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> <span>+++</span> </div>															
<p><b>NOTES</b>                      • Purpose: To improve clarity around monitoring and to ensure consistency with national policy                      • Previously Mod.1.28a</p> <p><b>COMMENTARY</b>                      By ensuring compliance with conditions, <b>this proposed modification</b> is assessed as having:                      • <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (5) helping to <b>minimise CO<sub>2</sub> emissions and address the causes of climate change</b> (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London</p>															



SA FRAMEWORK OBJECTIVES															
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To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>MODIFICATION 46 (Post EIP)</b> After Para 5.57 – page 41  <i>"The South London Waste Plan boroughs will engage with all relevant Duty to Cooperate stakeholders on an ongoing basis in a constructive, an active and an ongoing basis on any relevant strategic matters. A lead borough shall be nominated to carry out this responsibility as and when required."</i>															
+++	+++	+++	+++	+	+	+	+	+	+++	+	+		+	+	+
<b>NOTES</b> • Purpose: To improve the clarity of the SLWP and to make clear the Plan's ongoing commitment to DtC By ensuring that the SLWP boroughs work with each other and with all other relevant 'duty to cooperate' bodies to monitor the plan and the coordinate any necessary contingency actions to ensure that the plan's strategic objectives, policies and targets are met, <b>this proposed modification</b> is assessed as having potentially: • <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) securing the transition to a <b>circular economy</b> and (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses • <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses • <b>SMALL BENEFICIAL IMPACTS (+)</b> for (5) helping to minimise CO <sub>2</sub> emissions and address the causes of climate change (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity</b> and the historic environment (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b> ; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> .															
<b>MODIFICATION 47 (Post EIP)</b> Para 5.59 First Sentence – p41 Insert new paragraphs after 5.58 <i>"In addition to monitoring the implementation of the Plan, it is equally important to ensure the performance of operational waste sites is monitored too. This is the responsibility of a number of parties, namely: The South London Waste Plan Boroughs, the Environment Agency and waste site operators.</i>  <i>The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit.</i>  <i>"Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). The responsibility for checking compliance falls to the issuer of the permit (the regulator).</i>															
				+	+	+	+	+++	+++	+++	+		+		

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<p><b>MODIFICATION 47 (continued)</b>                      ...Regulations are the basis for any enforcement action and the principal offences are:                      • <u>operating [without] a permit;</u>                      • <u>causing or knowingly permitting a water discharge activity or groundwater activity without a permit;</u>                      • <u>The Environmental Permitting failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.</u>                      Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health.                      The SLWP Boroughs will monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the Waste AMR. Any additional information on enforcement action can be requested from the regulator. In addition, planning legislation gives powers to local authorities to take enforcement action where development has been carried out, either: without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not been delivered. As such, the South London Waste Boroughs' individual Planning Enforcement teams will investigate alleged planning breaches related to waste developments within their respective boroughs. When considering what action to take, if necessary, the Boroughs will have regard to national planning policy and guidance, and any relevant legislation..</p>															
				+	+	+	+	+++	+++	+++	+		+	+++	+++
<b>NOTES</b>	<b>COMMENTARY</b>														
<ul style="list-style-type: none"> <li>Post Examination Modification</li> <li>Purpose: To improve clarity of the SLWP with regards to the different stakeholders involved in monitoring and what their roles are</li> </ul>	By clarifying the respective roles and responsibilities of the SLWP Boroughs, the EA and waste site operators in terms of monitoring and reporting on breaches of planning obligations, enforcement notices and/or waste permitting conditions this proposed modification is expected to have: <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (+++)</b> for (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) minimising potentially adverse effects on <b>human health and the open environment</b>; and (16) promoting <b>equalities, accessibility and social inclusion</b> within South London.</li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for (5) helping to minimise CO<sub>2</sub> emissions and <b>address the causes of climate change</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (12) helping to protect and enhance <b>biodiversity and habitats</b>, and (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></li> </ul>														

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<p><b>MODIFICATION 48</b>                      Policy WP10 – page 41                      Amend as follows:  <i>"Policy WP10</i>  <i>The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report (AMR) will report on the Outcome of plan the monitoring and the boroughs, in consultation with each other and with other relevant Duty to Cooperate bodies as appropriate, such as the GLA, LWARB, EA, the South London Waste Partnership and the waste management industry, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring."</i></p>															
+++												+++			
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To improve the clarity of the SLWP with regards to those stakeholders likely to be engaged in DtC and contribute towards the monitoring of the Plan</li> <li>Previously Mod 2.2</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By ensuring that the SLWP boroughs work with each other and with all other relevant 'duty to cooperate' bodies to monitor the plan and the coordinate any necessary contingency actions to ensure that the plan's strategic objectives, policies and targets are met, <b>this proposed modification</b> is assessed as having:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b>; for (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> and (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector.</b></li> </ul>															

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<p><b>MODIFICATION 49</b>  <b>How to read the information on Safeguarded Sites – page 43</b>                      Under 'Maximum throughput (in tonnes per annum)'- amend as follows:  <i>"The maximum throughput achieved by the site in any one year between 2013 and 2017 in the last five year period, using the latest available information from the Environment Agency Waste Data Interrogator. The 2019-IP 2021 London Plan recommends that boroughs should use this measure to assess capacity."</i></p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: To improve the clarity and consistency of the SWLP and to ensure the latest London Plan is referenced;</li> <li>• Previously Mod.1.25</li> </ul>															
<p style="text-align: center;"><b>No significant impacts –</b>                      This modification does not constitute a material change in policy</p>															
<p><b>MODIFICATION 50 (Post EIP)</b>  <b>Sites and figures – pages 44 to 91</b>                      Update figures in accordance with the Figures set out in the updated Appendix 2 in Annex 1 to the Modifications Schedule.</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>• Purpose: So the SLWP reflects the latest available data at the time of the hearings.</li> </ul>															
<p style="text-align: center;"><b>No significant impacts –</b>                      This modification is factual and does not constitute a material change in policy</p>															



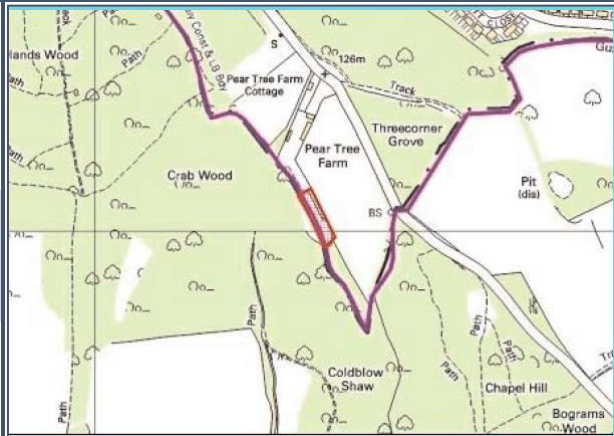


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<p><b>MODIFICATIONS 52 AND 70</b>                      'Opportunity to increase waste managed' - Delete sentence:  <i>"There are no plans by the South London Waste Partnership to intensify operations at this site."</i>  <b>MODIFICATION 52:</b> Site C5a, p 46  <b>MODIFICATION 70:</b> Site K4, p 59</p> <p>NOTES                      • Purpose: Contributes to consistency, clarity and updates with the latest information in response to Con25/Rep 90 from South London Waste Partnership:                      Previously Mods 3 and 4.</p> <p style="text-align: center;"><b>No significant impacts – factual change</b></p>															
<p><b>MODIFICATIONS 57 and 115</b>                      Add the Tier number to the archaeological consideration:  <i>"Evaluating and preserving any archaeological remains (Tier 4)"</i>  <b>MODIFICATION 57:</b> Site C7 – p 49  <b>MODIFICATION 115:</b> Site S10–p 89</p> <p>• Purpose: To improve clarity and ensure consistency across safeguarded sites in the SLWP.                      • Inspector's Question M4 [vi] 2c                      • Previously Mod 12.9</p> <p>By adding a new requirement to evaluate and preserve any archaeological remains in the list of 'issues to consider' for Site S10, <b>this proposed modification</b> is assessed as having:                      • <b>LARGE BENEFICIAL IMPACTS (++)</b> terms of (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></p>															
<p><b>MODIFICATION 58</b>                      Site C8: Issues to consider – p 50  <i>Conserving, and where possible enhancing, Ensuring the preservation or enhancement of the setting and significance of Airport House, a Grade II* Listed building opposite</i></p> <p>By including the aim of 'ensuring the preservation or enhancement of the setting and significance of Airport House within the context of site C8, <b>this proposed modification</b> is assessed as having:                      • <b>LARGE BENEFICIAL IMPACTS (++)</b> for (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></p>															
<p>NOTES                      • Purpose: To ensure consistency with national policy                      • Previously Mod 3.2</p>															

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<b>MODIFICATION 60</b> Site C9: Issues to consider – p51 Amend issue as follows: "Developers planning to intensify develop the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>Designing the site so that operations, <i>whether already on site or proposed to be situated in replacement buildings</i>, are <i>would be</i> carried out within fully enclosed building(s) that do not impact the openness of the Green Belt/MOL."</li> </ul>													+++ +++		
<b>NOTES</b> Purpose: To improve clarity and ensure consistency with national policy; <ul style="list-style-type: none"> <li>Previously Mod 3.3 (with minor changes)</li> </ul> By amending the relevant bullet point under 'issues to consider' to ensure that new or replacement fully enclosed buildings on this site do not impact the openness of the Green Belt/MOL, this proposed modification is assessed as having: <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (++)</b> for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment and (15) Helping to minimise potentially adverse effects on human health and the open environment</li> </ul>															
<b>MODIFICATION 61</b> Site C9: Map – page 1 Replace existing site boundary with the site boundary in red on the map above.													No significant impacts – factual change		
<b>NOTES</b> <ul style="list-style-type: none"> <li>To improve clarity and correct an error).</li> <li>previously Mod 3.2</li> </ul>															



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<b>MODIFICATION 63</b> Site C10: Issues to consider – page 52 Amend issue as follows: <i>"The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018 and attention should be paid to ensure satisfactory residential amenity of the for any existing and future occupiers of this allocation."</i>															
										+++			+++	+++	+++
<b>NOTES</b> Purpose: To ensure residential amenity is protected for G & Ts Inspector's Question M4 [vi] 2i Previously Mod. 3.5															
<b>COMMENTARY</b> By requiring proposed waste developments to maintain residential amenity for the occupiers of this allocated gypsy and traveller site, this proposed modification is assessed as having: <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (++)</b> for (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> and (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>, and(16) helping to promote <b>equalities, accessibility and social inclusion</b>.</li> </ul>															
<b>MODIFICATION 64</b> Site C11- page 53 Delete this site and all reference to it in the Plan  <b>NOTE</b> <ul style="list-style-type: none"> <li>The site has planning permission for a waste use but this has not been implemented. Site is currently being used for industrial uses and the land owners do not intend to implement the waste permission</li> <li>Inspector's Question M3 [v] 6</li> <li>Previously Mod 3.6</li> </ul>															
No significant impacts															
<b>MODIFICATION 71</b> After Site K4 – page 55 Add new site safeguarding sheet: <i>"K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD"</i> See Annex 1 to Modifications Schedule															
++	++	++	++						++						
<b>NOTES</b> <ul style="list-style-type: none"> <li>Purpose: To consistency, clarity and updates with latest information</li> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (1) Promoting <b>net self-sufficiency</b> within South London (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings) (3) Promoting <b>waste re-use, recycling and recovery</b> within South London (4) helping to secure the transition to a <b>circular economy</b>, and (9) helping to deliver <b>sustainable transport</b> objectives with the plan area</li> </ul>															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATIONS 76, 82, 85, 88, 91, 94, 99, 109, 112 and 119</b>                      Issues to consider (multiple sites)                      Amend bullet point as follows:  <i>"Designing a facility that does not impact on the openness of takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land".</i></p> <p>MODIFICATION 76: Site M6 - p66                      MODIFICATION 82: Site M10 – p70                      MODIFICATION 85: Site M11 – p 71                      MODIFICATION 88: Site M12 – p72                      MODIFICATION 91: Site M14 – p72                      MODIFICATION 94: Site M15 – p 75                      MODIFICATION 99: Site M16 – p76                      MODIFICATION 109: Site S3 – p82                      MODIFICATION 112: Site S7 – p86                      MODIFICATION 119: Site S12 – p91</p>															
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To ensure consistency with national policy and internal consistency in SLWP</li> <li>Related to previous Mod 3.1.</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By ensuring that proposed waste developments on the ten sites listed listed give consideration to their "wider visual or landscape effects on the adjoining Metropolitan Open Land", this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (++)</b> for (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> </ul>															
<p><b>MODIFICATIONS 77, 83, 87, 92, 93, 95, 100, 106-107 and 118</b>                      Issues to consider                      Insert the following as an additional bullet point:  <i>"Protecting the amenity of the Wandle Valley Regional Park and those using it."</i></p> <p>MODIFICATION 77: Site M6, page 66                      MODIFICATION 83: Site M10, page 70                      MODIFICATION 87: Site M12, page 72                      MODIFICATION 92: Site M14, page 74                      MODIFICATION 93: Site M15, page 75                      MODIFICATION 95: Site M15, page 75                      MODIFICATION 100: Site M16, p 76                      MODIFICATION 106: Site S2, page 81                      MODIFICATION 107: Site S3, page 81                      MODIFICATION 118: Site S12, p91</p>															
<p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To improve the clarity and consistency of the SLWP</li> <li>Related to previous Mod 3.1.</li> </ul>															
<p><b>COMMENTARY</b></p> <p>By inserting an additional 'issue to consider' relating to the need to 'protect the amenity of the Wandle Valley Regional Park and those using it' for ten of the allocated sites this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> <li><b>LARGE BENEFICIAL IMPACTS (++)</b> for (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> and (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London.</li> </ul>															

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To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve	
<b>MODIFICATION 80</b> Site M9: Opportunity to increase waste managed – page 69 Delete: <i>"No. The plot throughput ratio is above the average for this type of facility so there are unlikely to be opportunities to intensify the throughput"</i> Add: <i>"Yes. Although the plot throughput ratio is currently above average for this type of facility any forthcoming planning application seeking opportunities to intensify the throughput would need to demonstrate that the site has the appropriate environmental capacity"</i>																
							+	+	+	+			+	+	+	
<b>NOTES</b> <ul style="list-style-type: none"> <li>Purpose: Contributes to consistency, clarity and updates with the latest information</li> <li>in response to Con16/Rep 94 from Mr M Kelly as agent</li> <li>Previously Mod 6</li> </ul> By requiring any forthcoming planning applications for intensifying this site to demonstrate that the site has the appropriate environmental capacity, this proposed modification is assessed as having: <ul style="list-style-type: none"> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> (9) helping to deliver <b>sustainable transport</b> objectives (10) minimising <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and(16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London</li> </ul>																
<b>MODIFICATION 81: Site M9, page 69</b> <b>MODIFICATION 96: Site M15, page 7</b> Issues to consider Amend as follows: <i>"Protecting the residential amenity Contributing positively to the living conditions of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts."</i>																
					+	+	++	++	++	++			+	++	++	
<b>NOTES</b> <ul style="list-style-type: none"> <li>Purpose: . To improve clarity and ensure consistency across safeguarded sites in the SLWP</li> <li>Previously Mod 2.4</li> </ul> <b>COMMENTARY</b> By including the aim of 'contributing positively' to the residential amenity of those properties in the vicinity of the respective sites (M9 and M15) as one of the 'issues to consider', rather than just giving consideration to this aspect, <b>this proposed modification</b> is assessed as having: <ul style="list-style-type: none"> <li><b>MEDIUM BENEFICIAL IMPACTS</b> for (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (9) helping to deliver <b>sustainable transport</b> objectives (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and( 16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London</li> <li><b>SMALL BENEFICIAL IMPACTS</b> for (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> and (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></li> </ul>																



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(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<b>MODIFICATION 86</b> Site M12: Issues to consider p72 Amend as follows: <i>"Protecting the residential amenity of those properties (both bricks and mortar and Gypsy and Traveller accommodation) in the vicinity of the site, especially with regard to air emissions and noise impacts"</i>															
					+	+	+	+	++	++			++	+++	+++
<b>NOTES</b> • Purpose: To ensure residential amenity is protected for Gypsy and Travellers															
<b>COMMENTARY</b> By ensuring that any proposed waste facilities on site M12 will, protect the residential amenity for occupants of gypsy and traveller accommodation as well as build dwellings ('bricks and mortar'), this proposed modification is expected to have: <ul style="list-style-type: none"> <li>• <b>LARGE BENEFICIAL IMPACTS (+++)</b> for (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and(16) helping to promote <b>equalities, accessibility and social inclusion</b>.</li> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b>, and (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></li> <li>• <b>SMALL BENEFICIAL IMPACTS (+)</b> (6) helping to ensure that all new or upgraded waste management facilities are <b>adapted to the future impacts of climate change</b> (7) helping to avoid, reduce and manage <b>flood risk to and from waste developments</b> (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (9) helping to deliver <b>sustainable transport</b> objectives with the plan area</li> </ul>															
<b>MODIFICATION 97</b> Site M16: Issues to consider – p76 Delete <i>"Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</i> Replace with: <i>"Conserving, and where possible enhancing, the significance of the Wandle Valley Conservation Area"</i>															
										++			++		
<b>NOTES</b> • Purpose: To ensure consistency with national policy • response to Con44/Rep 103 from Historic England and Inspector's Question M4 [vii] 2e • Previously Mod 12.1															
<b>COMMENTARY</b> By including a requirement under 'issues to consider' for proposed developments on this , Site to consider opportunities for _conserving, and where possible enhancing, the setting and significance of the Wandle Valley Conservation Area, rather than just 'not adversely affecting' it, this proposed modification is assessed as having: <ul style="list-style-type: none"> <li>• <b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b>.</li> </ul>															

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SA FRAMEWORK OBJECTIVES																
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<b>MODIFICATION 103</b> Site S1 777 Recycling Centre–p 80 Delete Site S1 '777 Recycling Centre' and any other references to it in the Plan.																
	+							+	+	+			+			
<b>NOTES</b> Purpose: Site throughput has significantly declined and will continue to do so. Operations are due to cease due to viability SLWP has sufficient capacity to achieveself-sufficiency without it																
<b>COMMENTARY</b> By removing this waste site allocation from the plan while ensuring that the SLWP has sufficient capacity to achieve net-self-sufficiency over vthe plan period without it, this proposed modification will have following localised impacts.																
<ul style="list-style-type: none"> <li><b>SMALL BENEFICIAL IMPACTS (++)</b> for (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London’s waste arisings (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (13) promoting <b>local employment, South London’s economy and the competitiveness of the waste sector</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></li> </ul>																
<b>MODIFICATION 105</b> Site S2: Issues to consider – p 81 Insert additional bullet point: "Undertaking an air quality assessment and transport assessments in accordance with the requirements of Policy WPS"																
							++	++	++	++					++	++
<b>NOTES</b> <ul style="list-style-type: none"> <li>Purpose: Improve clarity of the SLWP and internal consistency</li> <li>in response to Inspector’s Question M4 [vii] 20</li> <li>Previously Mod 12.5</li> </ul>																
<b>COMMENTARY</b> This proposed modification is assessed as having:																
<ul style="list-style-type: none"> <li><b>MEDIUM BENEFICIAL IMPACTS</b> for (8) helping to promote the highest standards of <b>sustainable design and construction</b> in new or upgraded waste facilities (9) helping to deliver <b>sustainable transport</b> objectives (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and( 16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London; and</li> </ul>																
<b>MODIFICATION 114</b> Site S10: Issues to consider – p89 Amend bullet point as follows: "Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads"																
	++			++				++	++	++	+		+	++	+	
<b>NOTES</b> <ul style="list-style-type: none"> <li>Inspector’s Question M4 (vii) 2L</li> <li>Previously Mod 12.8</li> </ul>																
By amending the 'issues to consider' listed for this site to require an assessment of the cumulative impacts on the highway network (in discussion with TfL) and opportunities for limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads, this proposed modification is assessed as having:																
<ul style="list-style-type: none"> <li><b>MEDIUM BENEFICIAL IMPACTS (++)</b> for (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London’s waste arisings) (5) helping to <b>minimise CO<sub>2</sub> emissions and address the causes of climate change</b> (9) helping to deliver <b>sustainable transport</b> objectives (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (15) Helping to minimise potentially adverse effects on <b>human health and the open environment</b>; and</li> <li><b>SMALL BENEFICIAL IMPACTS (+)</b> for(12) helping to protect and enhance <b>biodiversity and habitats</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b> and (16) helping to promote <b>equalities, accessibility and social inclusion</b> within South London</li> </ul>																

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<p><b>MODIFICATION 116</b>  <b>Site S11: TGM Environment – p 90</b>  Delete Site S11 from schedule of safeguarded sites, Appendix 2 and any other references in the Plan.</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: The site has planning permission for a waste use but this has not been implemented. Currently being used for industrial uses and the land owners do not intend to implement the permission.</li> </ul> <p>Inspector’s Question M3 [iv] 9  Previously Mod 12.10</p>																
<p>No significant impacts – factual change</p>																
<p><b>MODIFICATION 120</b>  Appendix 1: Monitoring Table–p93  Modify the Monitoring and Contingencies Table in accordance with Annex 2</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: To ensure that the monitoring of the SLWP is effective.</li> <li>in response to multiple Inspector’s questions regarding plan monitoring</li> </ul>																
<p>+++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++</p>																
<p><b>COMMENTARY</b></p> <p>By significantly expanding the scope of monitoring and reporting on SLWP objectives and targets in order to address specific issues of concern highlighted by objectors and the Inspector, and by identifying the actions to be taken in the event that SLWP objectives and targets are not being delivered, this <b>proposed modification</b> is assessed as having potentially strong benefits for all SA criteria:</p>																
<p><b>MODIFICATION 121</b>  Appendix 2 – page 99  Update Appendix 2 in accordance with Annex 3 to this Schedule of Main Modifications</p> <p><b>NOTES</b></p> <ul style="list-style-type: none"> <li>Purpose: Contributes to consistency, clarity and updates with the latest information.</li> </ul>																
<p>No significant impacts – factual change</p>																

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<p><b>MODIFICATION 122</b> Appendix 3- page 102 Amend Site S1 '777 Recycling' as follows: <i>"Safeguarding carried forward as Site S1 The throughput of the Site has significantly declined and the operator is planning to cease operations due to viability. Capacity from this site is no longer required to meet the waste apportionment."</i></p>															
	+							+	+	+			+		
<p><b>NOTES</b> Purpose: To ensure internal consistency within the SLWP</p> <p><b>COMMENTARY</b> By removing this waste site allocation (S1) from the plan while ensuring that the SLWP has sufficient capacity to achieve net-self-sufficiency over vthe plan period without it, this proposed modification will have following localised impacts.</p> <ul style="list-style-type: none"> <li><b>SMALL BENEFICIAL IMPACTS (++)</b> for (2) Promoting an environmentally <b>sustainable strategic approach</b> to managing South London's waste arisings (9) helping to deliver <b>sustainable transport</b> objectives with the plan area (10) Helping to minimise <b>air pollution</b> and potential impacts on sensitive land-uses (11) minimising the <b>adverse impacts arising from the construction and operation of waste facilities</b> (12) helping to protect and enhance <b>biodiversity and habitats</b> (13) promoting <b>local employment, South London's economy and the competitiveness of the waste sector</b> (14) minimising adverse impacts on the quality of <b>townscape and visual amenity and the historic environment</b></li> </ul>															

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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO <sub>2</sub> emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p><b>MODIFICATION 123</b> Appendix 4: Glossary – page 104 Additions to the Glossary:</p> <p><i>'Consented Waste Site: A site that has planning permission for a new waste management facility or an existing, Site that has planning permission where an increase in intensification is permitted, for example where:</i> <i>longer operating times are permitted on the existing site; and/or additional storage, machinery, buildings, parking or access roads are permitted on the existing site; and/or the boundary of the site is extended to allow for either of the above.</i></p> <p><i>Existing Waste site: A waste site that is materially in operation as a waste site</i> <i>Safeguarded Waste site: A site that is safeguarded for waste uses. This may include sites that are materially operational as waste facilities, vacant waste facilities or vacant plots of land that are safeguarded for waste.</i></p>															
No significant impacts – factual change															
<p><b>MODIFICATION 124</b> Appendix 5: Superseded Policies – page 106 Add new Appendix 5 as follows: <b>Appendix 5 South London Waste Plan 2012 Superseded Policies (*various)</b></p>															
No significant impacts – factual change															





## 3. Conclusions

### Findings of the SA Addendum Report on Main Modifications

**3.1** This Final SA Addendum Report has been prepared in order to assess the likely impacts of each of the Main Modifications to the draft South London Waste Plan (SLWP) on the environmental, social and economic objectives making up the SA Framework. The Main Modifications subjected to appraisal in Section 2 are based on the finalised Schedule of Proposed Modifications prepared for consultation by the four SLWP Boroughs in February 2022. This consolidates the Proposed Modifications<sup>14</sup> submitted to the Inspector in July 2021 with number of further changes which have been proposed subsequently in order to address matters of 'soundness' considered at the Examination in Public (EiP) in September 2021, the Inspector's closing remarks and recommendations set out in the Inspector's subsequent letter. There are 131 modifications in total.

**3.2** The appraisal matrix presented in Section 2 of this SA Report therefore consolidates the appraisal matrix set out in the previous SA Report on Proposed Modifications originally submitted to the Inspector in July 2021 together with additional appraisal work undertaken on the further changes. However many of the original modifications which were appraised in the previous SA Report have been brought forward unchanged (although with revised numbering).

**3.3** The outcome of this final appraisal shows that all 152 of the Main Modifications which constitute a material change in policy have potentially significant beneficial impacts on a range of sustainability criteria. None of the modifications is assessed as assessed as having a negative impact (i.e. by comparison with *not* introducing the change and continuing with the original policy wording).

**3.4** This findings of this SA Addendum Report should be read in conjunction with the previous SA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and on the Proposed Modifications (July 2021); the Habitats Regulations Assessment (HRA) screening report, the Equalities Impact Assessment (EqIA) and the forthcoming Waste Annual Monitoring Report (AMR) 2020-21.

### Overall sustainability appraisal conclusions

**3.5** Throughout all stages of plan preparation, the SA process report has been prepared in line with best practice and meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in government planning practice guidance and the SEA regulations respectively. It is soundly based upon the best available local evidence for each of the four boroughs and draws upon the initial analysis of site throughput, capacity and environmental constraints set out in the South London Technical Paper prepared by Anthesis consultants in June 2019, subsequent detailed site appraisal work undertaken by the four boroughs, updated information from site operators, consultation responses and updated information on waste throughputs (WDI).

**3.6** The report builds upon the SA Scoping Report published in September 2019 and the previous SA Reports on the SLWP Issues and Preferred Options document published in October 2019, the

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<sup>14</sup> the proposed Modifications submitted to the Inspector in July 2021 consisted of the Main Modifications initially submitted to the Inspector alongside the draft SLWP on 19 January 2021 together with the Additional Main Modifications which were proposed subsequently in the light of the Inspector's schedule of matters, issues and questions (MIQs) - see <https://drive.google.com/file/d/13PYU-TX59iM4GNfTz8hGgQgj6dmqNDu/view>

Proposed Submission (September 2020) Modifications (July 2021). As part of the appraisal process, the SA Framework has been refined to take account of comments from the Environment Agency, Natural England and Historic England.

**3.7** The SA on the draft SLWP Proposed Submission, when read together this Final SA Addendum Report on Main Modifications, demonstrates that the final SLWP 2022-37 (Option 1 - amended), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

**3.8** Overall, the most important sustainability benefits of the finalised SLWP, incorporating main modifications, include:

- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;
- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
- 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; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery** towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and

- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

## Next Steps

**3.9** This Final SA Addendum Report on Main Modifications will be published for consultation together with the draft SLWP, the Schedule of Proposed Modifications and the EqIA between xxx MONTH and YYY MONTH. Following final approval of the plan by the four boroughs, the final SLWP 2022-2037 will subsequently be adopted later in 2022

**3.10** All information relating to the examination process will be made available online at [www.sutton.gov.uk/wasteplan](http://www.sutton.gov.uk/wasteplan)







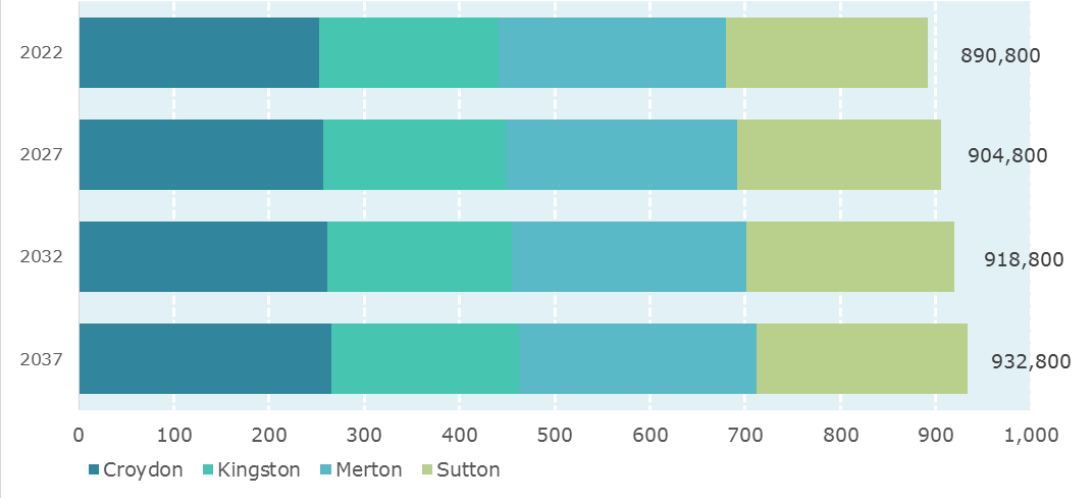
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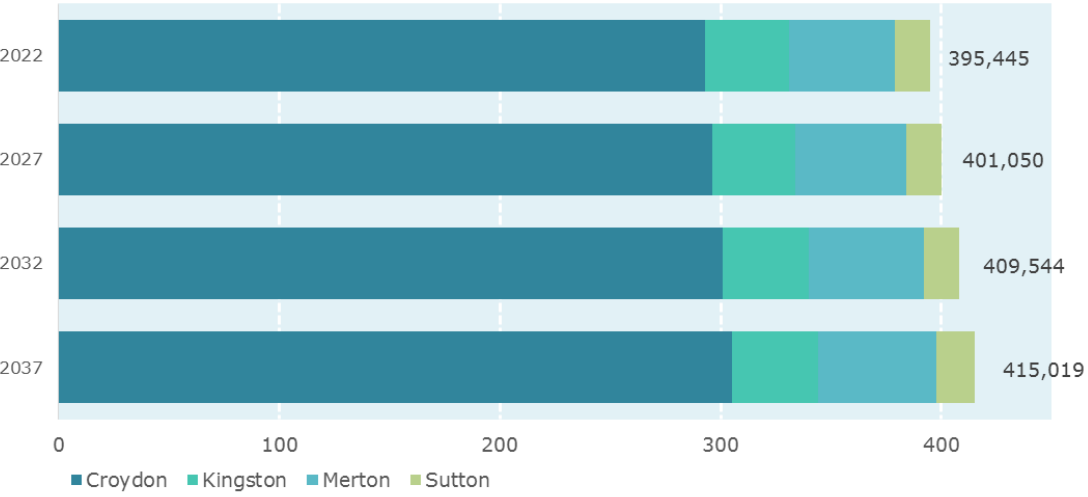
## Appendix - Main Modifications to the Draft South London Waste Plan

- ~~Strikethrough~~ text indicates a proposed deletion.
- **Bold Underlined** indicates a proposed addition to the text.
- ..... denotes the presence of intervening text

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM1.1	1	Para 1.1 1 <sup>st</sup> sentence	The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from <del>2021</del> <b><u>2022</u></b> to <del>2036</del> <b><u>2037</u></b> .
MM1	1	Insert new paragraph after 1.4	After para 1.3, insert:  <b><u>Community involvement in local planning matters is an essential part of the planning process. Each of the South London Waste Plan Boroughs has an adopted Statement of Community involvement (SCI), a document which aims to ensure that all sections of the community understand how they are able to contribute to the planning process. When planning applications are submitted to the Boroughs, including applications involving waste uses, community involvement will be sought in accordance with the relevant Boroughs' SCI.</u></b>
MM2	3	Para 2.1 Final sentence	"This South London Waste Plan is the replacement document and covers the period <del>2021</del> <b><u>2022</u></b> to <del>2036</del> <b><u>2037</u></b> and <b><u>supersedes the 2012 South London Waste Plan. A list of superseded policies is set out in Appendix 5</u></b> ".
MM3	5	Para 2.11 Third bullet	<ul style="list-style-type: none"> <li>• <del>95% of construction, demolition and excavation waste to be recycled by 2020</del> <b><u>of excavation material to go to beneficial use and 95% of construction and demolition waste for reuse, recycling or recovery. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences, climate change adaption/mitigation or landfill restoration.</u></b></li> </ul>
MM4	10	Para 3.8	Add:  The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. <b><u>Similarly, HCI waste sent to the Redhill Landfill site is due to be managed in Beddington, following the planned closure of the landfill</u></b>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p><b><u>in 2027.</u></b> Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes. <b><u>However, the Plan identifies sufficient capacity within the plan area to exceed arisings for construction and demolition waste. The Boroughs will continue to monitor cross-boundary movements of waste through the duty to cooperate.</u></b></p>
MM5	12	Para 3.11	<p>The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities <b><u>outside the South London waste plan area</u></b> which receive South London waste are able to do so in the future. <b><u>No planning issues have been identified which will prevent the continued cross-boundary movements of waste</u></b> and the achievement of this task can be seen in the Statements of Cooperation which accompany this plan. <b><u>The Boroughs will continue to monitor cross-boundary movements of waste and engage with relevant authorities through the duty to cooperate, so any substantial changes can be considered in accordance with Appendix 1 'Monitoring'</u></b></p>
MM5.1	13	Figure 7	Replace Figure 7 with the update version below:

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																														
			<p data-bbox="994 204 1854 228"><b>Figure 7 Household, Commercial &amp; Industrial Waste Targets (thousand tonnes)</b></p>  <table border="1" data-bbox="972 244 2040 743"> <caption>Data for Figure 7: Household, Commercial &amp; Industrial Waste Targets (thousand tonnes)</caption> <thead> <tr> <th>Year</th> <th>Croydon</th> <th>Kingston</th> <th>Merton</th> <th>Sutton</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>250</td> <td>180</td> <td>240</td> <td>220</td> <td>890,800</td> </tr> <tr> <td>2027</td> <td>260</td> <td>190</td> <td>240</td> <td>230</td> <td>904,800</td> </tr> <tr> <td>2032</td> <td>270</td> <td>200</td> <td>240</td> <td>240</td> <td>918,800</td> </tr> <tr> <td>2037</td> <td>280</td> <td>210</td> <td>240</td> <td>250</td> <td>932,800</td> </tr> </tbody> </table>	Year	Croydon	Kingston	Merton	Sutton	Total	2022	250	180	240	220	890,800	2027	260	190	240	230	904,800	2032	270	200	240	240	918,800	2037	280	210	240	250	932,800
Year	Croydon	Kingston	Merton	Sutton	Total																												
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MM6	14	Para 3.16	<p data-bbox="965 871 2036 994">The London Plan sets a target that <u>in London <b>95% of excavation waste will go to beneficial use and</b> recycle and reuse <b>95% of construction and demolition waste will be reused, recycled or recovered</b></u> <del>95% of Construction and Demolition Waste by 2020:</del></p>																														
MM6.1	14	Figure 8	<p data-bbox="965 1058 1552 1082">Replace Figure 8 with the update version below:</p>																														

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																														
			<p data-bbox="972 209 1760 233"><b>Figure 8 Construction and Demolition Waste Targets (thousand tonnes)</b></p>  <table border="1" data-bbox="972 248 2056 746"> <caption>Data for Figure 8: Construction and Demolition Waste Targets (thousand tonnes)</caption> <thead> <tr> <th>Year</th> <th>Croydon</th> <th>Kingston</th> <th>Merton</th> <th>Sutton</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>~295</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>395,445</td> </tr> <tr> <td>2027</td> <td>~300</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>401,050</td> </tr> <tr> <td>2032</td> <td>~305</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>409,544</td> </tr> <tr> <td>2037</td> <td>~310</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>415,019</td> </tr> </tbody> </table>	Year	Croydon	Kingston	Merton	Sutton	Total	2022	~295	~35	~55	~10	395,445	2027	~300	~35	~55	~10	401,050	2032	~305	~35	~55	~10	409,544	2037	~310	~35	~55	~10	415,019
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2037	~310	~35	~55	~10	415,019																												
MM7	19	Para 4.2	<p data-bbox="958 855 2029 911">To achieve the vision, the South London Waste Plan has the following objectives, <b><u>which will be delivered through the policies in the Plan:</u></b></p> <ul data-bbox="958 943 2011 1342" style="list-style-type: none"> <li>• Objective 1: <b><u>To plan for net self-sufficiently by</u></b> Meet the 2019 ItP London Plan <b><u>meeting the 2021 London Plan</u></b> target for Household and Commercial and industrial waste. <b><u>To be delivered through Policies WP1, WP3 and WP4.</u></b></li> <li>• Objective 2: : <b><u>To plan for net self-sufficiently by meeting</u></b> Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural, where practical or necessary. <b><u>To be delivered through Policies WP2, WP3 and WP4.</u></b></li> <li>• Objective 3: Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan. <b><u>To be delivered through Policies WP3 and WP4.</u></b></li> </ul>																														




MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																			
			<ul style="list-style-type: none"> <li>Objective 4: Ensure there is <b><u>Support the need for</u></b> sufficient land for other industrial uses within the South London Waste Plan area's industrial estates <b><u>by not safeguarding more land for waste management than is required.</u></b> <b><u>To be delivered through Policies WP1, WP2, WP3 and WP4.</u></b></li> <li>Objective 5: Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity: <b><u>the character and appearance of its surroundings.</u></b> <b><u>To be delivered through Policies WP4, WP5, WP6, WP7, WP8 and WP9.</u></b></li> <li>Objective 6: Ensure the effects of new development are mitigated and, where possible, enhance amenity. <b><u>To be delivered through Policies WP4, WP5, WP6, WP8 and WP9.</u></b></li> <li><b><u>Objective 7: To support the movement of waste as far up the waste hierarchy as practicable.</u></b> <b><u>To be delivered through Policies WP3 and WP7</u></b></li> <li><b><u>Objective 8: To deliver waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy.</u></b> <b><u>To be delivered through Policies WP1, WP2, WP3, WP4, WP5 and WP7</u></b></li> <li><b><u>Objective 9: To ensure the delivery of sustainable waste development within South London through the integration of social, environmental and economic considerations.</u></b> <b><u>To be delivered through Policies WP1 to WP9</u></b></li> </ul>																			
MM7.1	22	Figure 11	<p>Replace Figure 11 with the update version below:</p> <p><b>Figure 11 Arisings and Apportionment at 2022 and 2037</b></p> <table border="1" data-bbox="938 1157 2056 1394"> <thead> <tr> <th rowspan="2">Borough</th> <th colspan="2">2022</th> <th colspan="2">2037</th> </tr> <tr> <th>Arisings</th> <th>Apportionment</th> <th>Arisings</th> <th>Apportionment</th> </tr> </thead> <tbody> <tr> <td>Croydon</td> <td>306,100</td> <td>252,800</td> <td>322,600</td> <td>264,800</td> </tr> <tr> <td>Kingston</td> <td>152,400</td> <td>187,600</td> <td>158,400</td> <td>196,600</td> </tr> </tbody> </table>	Borough	2022		2037		Arisings	Apportionment	Arisings	Apportionment	Croydon	306,100	252,800	322,600	264,800	Kingston	152,400	187,600	158,400	196,600
Borough	2022		2037																			
	Arisings	Apportionment	Arisings	Apportionment																		
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MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification									
			Merton	Sutton	Total							
			174,500	238,750	182,000	250,000						
			161,550	211,650	169,800	221,400						
			<b>794,550</b>	<b>890,800</b>	<b>832,800</b>	<b>932,800</b>						
MM8	23	Figure 13	Replace Figure 13 with the update version below:  <p><b>Figure 13 Capacity, Forecast and Surplus for Household and Commercial &amp; Industrial Waste</b></p> <table border="1"> <tr> <td>South London Capacity (2021)</td> <td>945,910 tonnes per annum</td> </tr> <tr> <td>South London Forecast (2037)</td> <td>932,800 tonnes per annum</td> </tr> <tr> <td>South London Surplus</td> <td>13,110 tonnes per annum</td> </tr> </table>				South London Capacity (2021)	945,910 tonnes per annum	South London Forecast (2037)	932,800 tonnes per annum	South London Surplus	13,110 tonnes per annum
South London Capacity (2021)	945,910 tonnes per annum											
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South London Surplus	13,110 tonnes per annum											
MM9	23	After para 5.8 New para          New para	<p><b><u>As such, the boroughs will not normally support new waste sites coming forward (outside of sites providing compensatory provision, as set out in Policy WP3), unless there are exceptional circumstances that justify it. This strikes a balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, whilst giving some flexibility for new waste sites to be delivered in appropriate circumstances.</u></b></p> <p><b><u>Applications outside of safeguarded waste sites will not be supported unless it can be demonstrate that there is a need for such a facility, having regard to the latest Waste Authority Monitoring Report and the ability of the Plan to meet the</u></b></p>									

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
		New para	<p><b><u>London Plan apportionment figure. In addition, applicants will need to provide evidence as to why it is not possible to use, expand or intensify an existing safeguarded waste site (as set out on pages 44-91 of this Plan).</u></b></p> <p><b><u>Furthermore, applications proposing waste facilities outside of the existing safeguarded sites will not be supported unless it can be demonstrated that the proposed site would be better suited to meeting the identified need for South London having regard to delivering the vision and objectives of the South London Waste Plan. For example, there may be an opportunity to co-locate a recycling facility with a reprocessing plant or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities. There may be instances in the future where advances in waste technologies are such that existing sites do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer. In any event, a new waste site will have to satisfy the locational criteria set out in Policy WP4 (b) to (g). The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational.</u></b></p>
MM10	23	Policy WP1	<p><b>WP1 Strategic Approach to Household and Commercial and Industrial Waste</b></p> <p>(a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the <del>2019 HWP</del> <b>2021</b> London Plan apportionment target of managing 932,800 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to <del>2036</del> <b>2037</b>.</p> <p>(c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).</p> <p>(d) New waste sites (either for transfer or management) will not <b>normally</b> be permitted, unless <del>they are for compensatory provision (see Policy WP3).</del></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																		
			<ul style="list-style-type: none"> <li>(i) <u>they are for compensatory provision (in accordance with Policy WP4); or</u></li> <li>(ii) <u>there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and</u></li> <li>(iii) <u>there is robust evidence that existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and</u></li> <li>(iv) <u>they would manage waste as high up the waste hierarchy as practicable; and</u></li> <li>(v) <u>they would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan,</u></li> </ul>																		
MM10.1	24	Figure 14	<p>Replace Figure 14 with the update version below:</p> <p><b>Figure 14 Construction and Demolition Waste Arisings at 2022 and 2037 (tonnes per annum)</b></p> <table border="1" data-bbox="943 810 2040 1153"> <thead> <tr> <th data-bbox="943 810 1346 895">Borough</th> <th data-bbox="1346 810 1682 895">2022 Arisings</th> <th data-bbox="1682 810 2040 895">2037 Arisings</th> </tr> </thead> <tbody> <tr> <td data-bbox="943 895 1346 946">Croydon</td> <td data-bbox="1346 895 1682 946">293,381</td> <td data-bbox="1682 895 2040 946">305,058</td> </tr> <tr> <td data-bbox="943 946 1346 997">Kingston</td> <td data-bbox="1346 946 1682 997">37,966</td> <td data-bbox="1682 946 2040 997">39,040</td> </tr> <tr> <td data-bbox="943 997 1346 1048">Merton</td> <td data-bbox="1346 997 1682 1048">48,391</td> <td data-bbox="1682 997 2040 1048">54,314</td> </tr> <tr> <td data-bbox="943 1048 1346 1099">Sutton</td> <td data-bbox="1346 1048 1682 1099">15,707</td> <td data-bbox="1682 1048 2040 1099">16,607</td> </tr> <tr> <td data-bbox="943 1099 1346 1153"><b>Total</b></td> <td data-bbox="1346 1099 1682 1153"><b>395,445</b></td> <td data-bbox="1682 1099 2040 1153"><b>415,019</b></td> </tr> </tbody> </table>	Borough	2022 Arisings	2037 Arisings	Croydon	293,381	305,058	Kingston	37,966	39,040	Merton	48,391	54,314	Sutton	15,707	16,607	<b>Total</b>	<b>395,445</b>	<b>415,019</b>
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MM11	24	Figure 15	Replace Figure 15 with the update version below:																		

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification								
			<p data-bbox="952 204 1839 228"><b>Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste</b></p>  <table border="1" data-bbox="976 268 2054 678"> <thead> <tr> <th>Category</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>South London Capacity (2021)</td> <td>568,162 tonnes per annum</td> </tr> <tr> <td>South London Forecast (2037)</td> <td>415,019 tonnes per annum</td> </tr> <tr> <td>South London Surplus</td> <td>153,173 tonnes per annum</td> </tr> </tbody> </table>	Category	Value	South London Capacity (2021)	568,162 tonnes per annum	South London Forecast (2037)	415,019 tonnes per annum	South London Surplus	153,173 tonnes per annum
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MM12	26	Para 5.17	<p data-bbox="965 799 1256 823">Add after last sentence:</p> <p data-bbox="965 866 2007 954"><b><u>As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify it, as set out in Policy WP2 (d).</u></b></p>								
MM13	26	Para 5.18	<p data-bbox="965 971 1256 995">Add after last sentence:</p> <p data-bbox="965 1035 2054 1283">The Waste Data Interrogator identified that only 383 tonnes of agricultural waste was generated in the South London Waste Plan boroughs in 2017. Given the relatively small tonnage of this waste, the fact that it can be mixed with Commercial and Industrial Waste and Construction and Demolition Waste and that it is often dealt with by Commercial and Industrial and Construction and Demolition waste facilities, there is no need for the South London Waste Plan boroughs to provide for this waste stream, <b><u>unless exceptional circumstances would justify this type of development, as set out in Policy WP2 (e d)</u></b></p>								
MM14	26	Para 5.19	<p data-bbox="965 1329 1256 1353">Add after last sentence:</p>								



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MM14.1	27	Figure 16	<p>Replace Figure 16 with the update version below:</p> <p><b>Figure 16 Hazardous Waste Arisings at 2022 and 2037 (tonnes per annum)</b></p> <table border="1"> <thead> <tr> <th>Borough</th> <th>2022 Arisings</th> <th>2037 Arisings</th> </tr> </thead> <tbody> <tr> <td>Croydon</td> <td>9,008</td> <td>9,217</td> </tr> <tr> <td>Kingston</td> <td>2,404</td> <td>2,442</td> </tr> <tr> <td>Merton</td> <td>4,591</td> <td>4,704</td> </tr> <tr> <td>Sutton</td> <td>5,239</td> <td>5,328</td> </tr> <tr> <td><b>Total</b></td> <td><b>21,242</b></td> <td><b>21,692</b></td> </tr> </tbody> </table>	Borough	2022 Arisings	2037 Arisings	Croydon	9,008	9,217	Kingston	2,404	2,442	Merton	4,591	4,704	Sutton	5,239	5,328	<b>Total</b>	<b>21,242</b>	<b>21,692</b>
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MM15	28	Para 5.21 New para	<p>After para 5.21, insert:</p> <p><b><u>The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational.</u></b></p>																		
MM16	28	Policy WP2	<p><b>WP2 Strategic Approach to Other Forms of Waste</b></p> <p>(a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the forecast arisings for Construction and Demolition waste of managing 415,019 tonnes per annum within their boundaries across the plan period to <del>2036</del> <b>2037</b>. The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).</p>																		

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>(c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5.</p> <p>(d) New sites (either transfer or management) will not <b>normally</b> be supported for <b>Construction and Demolition Waste</b>, Radioactive Waste, Agricultural Waste and Hazardous Waste, <b>unless:</b></p> <ul style="list-style-type: none"> <li>(i) <b><u>They are for compensatory provision (in accordance with Policy WP4); or</u></b></li> <li>(ii) <b><u>there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and</u></b></li> <li>(iii) <b><u>there is robust evidence that existing safeguarded sites within the South London Waste Plan area are not available or suitable, or that needs cannot be met through the adaption or intensification of existing facilities; and</u></b></li> <li>(iv) <b><u>they would manage waste as high up the waste hierarchy as practicable; and</u></b></li> <li>(v) <b><u>they would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan,</u></b></li> </ul> <p>(e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.</p>
MM17	29	Para 5.24	<p>In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. <b><u>This includes intensification or redevelopment to provide compensatory provision.</u></b></p>
MM18	29	Para 5.24	<p>Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the <b>relevant</b> policies in a borough's Development Plan.</p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM19	29	<p>Para 5.25 2<sup>nd</sup> sentence</p> <p>New para</p> <p>New para</p>	<p>The <del>2019 ItP</del> <b>2021</b> London Plan states “waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed” (paragraph 9.9.2). <b><u>The Environment Agency’s Waste Data Interrogator should be used when assessing the maximum throughput achieved over the last five years.</u></b></p> <p><b><u>Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for a non-waste use. This could be through the intensification of an existing safeguarded waste site or a compensatory site of a suitable size to meet at least the maximum annual throughput, subject to the requirements of Policy WP4. Boroughs will use conditions or legal agreements to satisfy themselves that compensatory capacity will be delivered before a safeguarded waste site is released to another use.</u></b></p> <p><b><u>In accordance with Policy SI 9 of the 2021 London Plan compensatory capacity should be provided within London. If it can be demonstrated that there is sufficient capacity in London to meet London’s apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses without the provision of compensatory provision.</u></b></p> <p>The evidence base supporting the economic policies in the <del>2019 ItP</del> <b>2021</b> London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses. Due to this the evidence also indicates that Croydon, Kingston and Merton should not release industrial land and that Sutton should provide more industrial capacity. As the South London Waste Plan area is already providing 13% more waste management capacity than waste arising in the South London Waste Plan area, the South London Waste Plan Boroughs have to carefully consider the balance of demand for further waste uses with the demand for other business and industrial enterprises to ensure a diverse and robust business base. <b><u>To help achieve a balance between ensuring there is sufficient waste management capacity in the South London Waste Plan area, whilst not stifling other land uses that are in high demand, compensatory provision from other London Boroughs will not normally be supported, unless the criteria in Policy WP3 can be met.</u></b></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM20	30	Policy WP3	<p><b>WP3 Existing Waste Sites</b></p> <p><b>Safeguarding</b>  (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses <del>only</del>.</p> <p><b>Intensification</b>  (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.</p> <p><b>Safeguarding Compensatory Provision</b>  (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision <del>necessary to be considered on a case by case basis</del> <b><u>at least meeting the equivalent of maximum achievable throughput of the site being lost.</u></b> The list of safeguarded sites will be updated with any compensatory sites in the <del>Sutton</del> <b>Waste</b> Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses <del>only</del>.</p> <p>(d) Compensatory provision for the loss of a waste site <b>from</b> outside the South London Waste Plan area will not <b>normally</b> be permitted, <b><u>unless there is robust evidence that:</u></b></p> <ul style="list-style-type: none"> <li>(i) <b><u>the compensatory provision is required for London to manage its waste sustainably and achieve net self-sufficiency; and</u></b></li> <li>(ii) <b><u>there are no available or suitable sites within the borough or waste planning area where the waste site will be lost; and</u></b></li> <li>(iii) <b><u>existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and</u></b></li> <li>(iv) <b><u>it would manage waste as high up the waste hierarchy as practicable; and</u></b></li> <li>(v) <b><u>it would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan.</u></b></li> </ul> <p>(e) <b><u>Applications for non-waste uses on safeguarded waste sites that accord</u></b></p>

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			<p><b><u>with all relevant aims and policies of the South London Waste Plan and the applicable borough's Development Plan, would be supported subject to appropriate conditions or legal agreements that ensure continued operational capacity.</u></b></p> <p><b>Safeguarding Waste Hierarchy</b>            (f) Any development on an existing safeguarded waste site, <b><u>including for compensatory provision,</u></b> will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.</p>
MM21	31	Para 5.28	<p>As set out in Policy WP, the <del>The</del> South London Waste Plan expects no new sites for waste use except where they are required for compensatory provision <b><u>(or new sites meeting the exceptional circumstances, set out in WP1 and WP2).</u></b> The location of compensatory sites must be carefully considered.</p>
MM22	31	Policy WP4	<p>Proposals for new waste sites <b><u>or development of existing safeguarded sites</u></b> to provide compensatory provision should:</p> <p>(a) Demonstrate that the site is capable of providing <del>sufficient compensatory capacity</del> <b><u>at least the equivalent of maximum achievable throughput of the site being lost.</u></b></p> <p>(b) Be Located on sites:</p> <p>(i) <b><u>Safeguarded for waste, including waste transfer stations, or</u></b> within Strategic Industrial Locations or Locally Significant Industrial Locations;</p>
MM23	31	Policy WP4	<p>d (i) do not result in visually detrimental development conspicuous from <del>strategic open land (eg Green Belt or Metropolitan Open Land);</del>  <b><u>(v) not within the Green Belt or Metropolitan Open Land</u></b></p>
MM24	31	Policy WP4	<p><b><u>(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost.</u></b></p> <p><del>(f)</del> <b><u>(h)</u></b> Meet the other policies of the relevant borough's Development Plan.</p>



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MM25	31	Policy WP4	<p><b><u>Consolidated changes to Policy WP4 (as set out above) for ease of reference:</u></b></p> <p>Policy WP4: Sites for Compensatory Provision</p> <p>Proposals for new waste sites <b><u>or development of existing safeguarded sites</u></b> to provide compensatory provision should:</p> <p>(a) Demonstrate that the site is capable of providing <del>sufficient compensatory capacity</del> <b><u>at least the equivalent of maximum achievable throughput of the site being lost.</u></b></p> <p>(b) Be located on sites:</p> <p>(i) <b><u>safeguarded for waste, including waste transfer stations, or</u></b> within Strategic Industrial Locations or Locally Significant Industrial Locations;</p> <p>(ii) not having an adverse effect on nature conservation areas protected by international or national regulations;</p> <p>(iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,</p> <p>(iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.</p> <p>(v) <b><u>not within the Green Belt or Metropolitan Open Land</u></b></p> <p>(c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;</p> <p>(d) Have particular regard to sites which:</p> <p>(i) do not result in visually detrimental development conspicuous from <del>strategic open land (eg Green Belt or Metropolitan Open Land)</del>;</p> <p>(ii) are located more than 100 metres from open space;</p> <p>(iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);</p> <p>(iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;</p> <p>(v) have direct access to the strategic road network;</p> <p>(vi) have no Public Rights of Way crossing the site;</p> <p>(vii) do not adversely affect regional and local nature conservation areas,</p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>conservation areas and locally designated areas of special character, archaeological sites and strategic views;</p> <p>(viii) offer opportunities to accommodate various related facilities on a single site;</p> <p>(e) Include appropriate mitigation measures which will be considered in assessing site suitability;</p> <p><b><u>(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost.</u></b></p> <p><del>(f)</del> <b><u>(g)</u></b> Meet the other policies of the relevant borough's Development Plan.</p>
MM26	33	Policy WP5	<p>(a) Developments for compensatory or intensified waste facilities should <b><u>contribute positively to the character and quality of the area and</u></b> ensure that any <b><u>potential adverse</u></b> impacts of the development <del>are designed and managed to mitigate any</del> achieve levels that will not significantly adversely affect <b><u>are appropriately mitigated.</u></b></p>
MM27	33	Policy WP5	<p>(c) (iii) <del>Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals, and residential areas.</del> <b><u>Heritage Assets and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</u></b></p> <p><b><u>(iv) sensitive receptors, such as schools, hospitals and residential areas;</u></b></p> <p>[Renumber other clauses accordingly]</p>
MM28	33	Policy WP5	<p>(c) <del>(v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</del></p> <p><b><u>(C) (v) Air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances; potential impacts within Air Quality Focus Areas. Air Quality Management Areas and/or the Mayor's expanded Ultra Low Emission Zone (ULEZ); cumulative impacts with other waste sites; the London Plan requirement for development proposals to be at least 'Air Quality Neutral'; and the use of design solutions to prevent or</u></b></p>

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			<b><u>minimise increased exposure of people and in particular vulnerable individuals to poor air quality.</u></b>
MM29	33	Policy WP5	(vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network <del>and the possibility of using sustainable modes of transport for incoming and outgoing materials;</del> <b><u>(viii) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials</u></b> <del>(viii)</del> <b><u>(vix) The safety and security of the site</u></b>
MM30	33	Policy WP5	Amend final sentence of Policy WP5:  The information in the schedule below will provide the basis for the assessment of the impact of a development <b><u>and should therefore be considered as part of any pre-application engagement.</u></b>
MM31	33	Policy WP5	<b><u>Consolidated changes to Policy WP5 (as set out above) for ease of reference:</u></b>  WP5 Protecting and Enhancing Amenity  (a) Developments for compensatory or intensified waste facilities should <b><u>contribute positively to the character and quality of the area and</u></b> ensure that any <b><u>potential adverse</u></b> impacts of the development <del>are designed and managed to mitigate any achieve levels that will not significantly adversely affect</del> <b><u>are appropriately mitigated.</u></b>  (b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.  (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar; (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected; <del>(iii) Archaeological sites, the historic environment and sensitive receptors,</del>

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			<p>such as schools, hospitals and residential areas;</p> <p><b><u>(iii) Heritage Assets that and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</u></b></p> <p><b><u>(iv) sensitive receptors, such as schools, hospitals and residential areas;</u></b></p> <p><b><u>(v) Groundwater, surface water and watercourses;</u></b></p> <p><del>(v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</del></p> <p><b><u>(vi) Air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances; potential impacts within Air Quality Focus Areas. Air Quality Management Areas and/or the Mayor's expanded Ultra Low Emission Zone (ULEZ); cumulative impacts with other waste sites; the London Plan requirement for development proposals to be at least 'Air Quality Neutral'; and the use of design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, such as children, people in poor health or the elderly".</u></b></p> <p><b><u>(vii) Noise and vibration from the plant and traffic generated;</u></b></p> <p><b><u>(viii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;</u></b></p> <p><b><u>(ix) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials</u></b></p> <p><b><u>(x) The safety and security of the site</u></b></p> <p><b><u>(xi) Odour, litter, vermin and birds; and,</u></b></p> <p><b><u>(xii) The design of the waste facility, particularly:</u></b></p> <ul style="list-style-type: none"> <li>• complementing or improving the character of an area;</li> <li>• limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;</li> <li>• being of a scale, massing or height appropriate to the townscape or landscape;</li> <li>• using good quality materials;</li> <li>• minimising the requirement for exterior lighting; and,</li> </ul>

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			<ul style="list-style-type: none"> <li>utilising high-quality boundary treatments.</li> </ul> <p>The information in the schedule below will provide the basis for the assessment of the impact of a development <b>and should therefore be considered as part of any pre-application engagement.</b></p>
MM32	34	Policy WP5 Schedule	<p>Schedule: Information which may be required for a planning application</p> <p>22. Air Quality <del>Impact</del> Assessment, <del>demonstrating</del> <b><u>setting out</u></b> the effects on air quality in the locality of the <b><u>proposed development site</u></b> arising from <b><u>approved construction works, on-site waste operations and associated vehicle movements, the operation of the site and vehicles movements to and from it.</u></b> <b><u>In line with London Plan Policy SI 1 on 'Improving Air Quality' and the relevant Local Plan policies, Air Quality Assessments must demonstrate that proposed developments:</u></b></p> <ul style="list-style-type: none"> <li><b><u>are at least 'Air Quality Neutral' having regard to the latest available Mayoral guidance on neutral and air quality positive approaches; promote opportunities to deliver further improvements to air quality; and do not conflict with ongoing London-wide or borough level activities aimed at reducing air pollution;</u></b></li> <li><b><u>do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; delay the date at which compliance will be achieved in areas that are currently in exceedance of national air quality objectives; or create an unacceptable risk of high levels of exposure to poor air quality;</u></b></li> <li><b><u>have assessed the cumulative impacts of multiple air pollution sources from the new development, for example, the on-site waste operations and associated vehicle movements, in combination with similar air pollution impacts from approved and proposed development, as advised by the council's Air Quality Officer.</u></b></li> <li><b><u>incorporate design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, including, but not limited to, children, people in poor health and the elderly; and</u></b></li> <li><b><u>incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions</u></b></li> </ul>



MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM33	34	Policy WP5 Schedule	<p><b>Schedule: Information which may be required for a planning application:</b></p> <p>30 Measures for protecting Public Rights of Way</p> <p>31 Transport Assessment, <b>which may address measures such as highway safety measures, protecting Public Rights of Way and an access strategy</b></p> <p>32 <del>Travel Plan</del> <b>Transport Management Strategies such as a Delivery Servicing Plan/Freight Plan, a Route Management Strategy, a Construction Logistics Plan and a Travel Plan.</b></p> <p>32 <del>Route Management Strategy</del></p> <p>33 <del>Access Strategy</del></p> <p>34 <del>Delivery Servicing Plan/Freight Plan</del></p> <p>35 <del>Construction Logistics Plan</del></p> <p>36 Highway safety measures</p>
MM34	36	Para 5.36	<p>A well designed and managed waste facility should be designed to be sustainable both in construction and future operation. "Designing Waste Facilities – A Guide to Modern Design in Waste" (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy S12 of the 2020 London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change. <b><u>In responding to the 'climate emergency' and the transition to a zero carbon economy within the South London Waste Plan area, all proposed waste facility developments should seek to achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials. As a minimum, all major waste proposals will be required to deliver net zero carbon standards in line with London Plan Policy SI2 through application of the Mayor's energy hierarchy (i) be lean: use less energy and manage demand during operation (ii) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly (iii) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site (iv) be seen: monitor, verify and report on energy performance. A minimum 35% reduction beyond Part L 2013 must be achieved on site for both major and minor proposals. Any</u></b></p>

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			<b><u>shortfall in emissions reductions must then be addressed through a financial contribution to the relevant borough's carbon offset fund.</u></b>
MM35	36	Para 5.38 Insert new paragraph after 5.38 (and renumber subsequent paragraph accordingly)	<b><u>Developers will have to provide justified costs for their proposals to demonstrate why the 'Excellent' rating would make their proposal unviable. The details of the costs to be provided should ideally be agreed with the relevant local authority as part of pre-application engagement.</u></b>
MM36	36	Para 5.39	<p>Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities— A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise. <b><u>As well as addressing the causes of climate change, waste proposals must be fully adapted to the future impacts of climate change through the following measures:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Heating, Cooling and Energy Use Overheating and cooling. Addressing summer overheating and the urban heat island (UHI) effect by incorporating green infrastructure as part of the design and layout in line with the Mayor's minimum 'urban greening factor' standards in London Plan Policy G6 (or the equivalent standards set out at borough level).</u></b> Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and minimising of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly;</li> <li>• <b><u>Flood Readiness. Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas. Flood Risk. Dealing with the increased frequency and severity of storm events resulting from climate change by incorporating sustainable urban design (SuDS) measures such as filter strips, permeable paving soakaways and green roofs as part of the design and layout. All waste proposals must achieve greenfield run off rates and volumes in the 1 in 100 year storm event plus climate change in line with part B of London Plan Policy SI 13;</u></b></li> </ul>

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			<ul style="list-style-type: none"> <li>Odours. <b><u>Dealing with odour issues which are exacerbated with higher temperatures by avoiding the use of unenclosed waste facilities will become particularly vulnerable to odour issues.</u></b></li> </ul>
MM37	36	Para 5.39	<p>Paragraph 5.41 (now 5.42):</p> <p><del>5.41</del> <b>5.42</b> Therefore in accordance with national and regional advice, the 2019<del>21</del> ItP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:</p>
MM38	37	Para 5.40	<p>In the construction phase of any development, consideration should be given to Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. <b><u>It is also an opportunity to promote and contribute towards the London Plan target of 95% of excavation material going to beneficial use and 95% of construction and demolition waste being reused, recycled or recovered.</u></b></p>
MM39	37	Policy WP6	<p>(b) Waste facilities will be required to:</p> <p>(v) minimise waste and promote sustainable management of construction waste on site <b><u>the beneficial use of excavation waste on site and the reuse, recycling or recover of construction and demolition waste on site;</u></b> and</p>
MM40	38	Para 5.44 Last sentence	<p><del>Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted.</del> <b><u>Notwithstanding this, the Mayor's London Plan sets out a number of benefits from waste that should be encouraged when development proposals are brought forward. Therefore, in accordance with London Plan Policy SI 8 Part D, the South London Waste Plan Boroughs will support schemes that also propose additional benefits alongside waste operations.</u></b></p>
MM41	38	Policy WP7	<p><b>WP7 The Benefits of Waste</b></p> <p>(a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.</p>

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			<p>(b) Waste development for additional Energy from Waste facilities will not <b><u>that can deliver additional benefits, as set out in London Plan Policy SI 8 Part D, Points 3 and 4, will</u></b> be supported <b><u>encouraged.</u></b></p> <p>(c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.</p>
MM42	39	Policy WP8	<p><b>WP8 New Development Affecting Waste Sites</b></p> <p>(a) New development should be designed to ensure that existing, <b><u>consented or safeguarded</u></b> waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.</p> <p>(b) Where new development is proposed that may be affected by an existing, <b><u>consented or safeguarded</u></b> waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:</p> <p>(i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision</p> <p>(ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligation</p> <p>(iii) <b><u>Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust.</u></b></p>
MM43	40	Para 5.52	<p>Amend examples of where a planning obligation may be considered as follows:</p> <ul style="list-style-type: none"> <li>• <b><u>Transport Management Strategies, that include Delivery and Servicing Plans that incorporate measures to; manage traffic routes to the site</u></b> Traffic management measures, including the routing of vehicles; supporting staff</li> </ul>

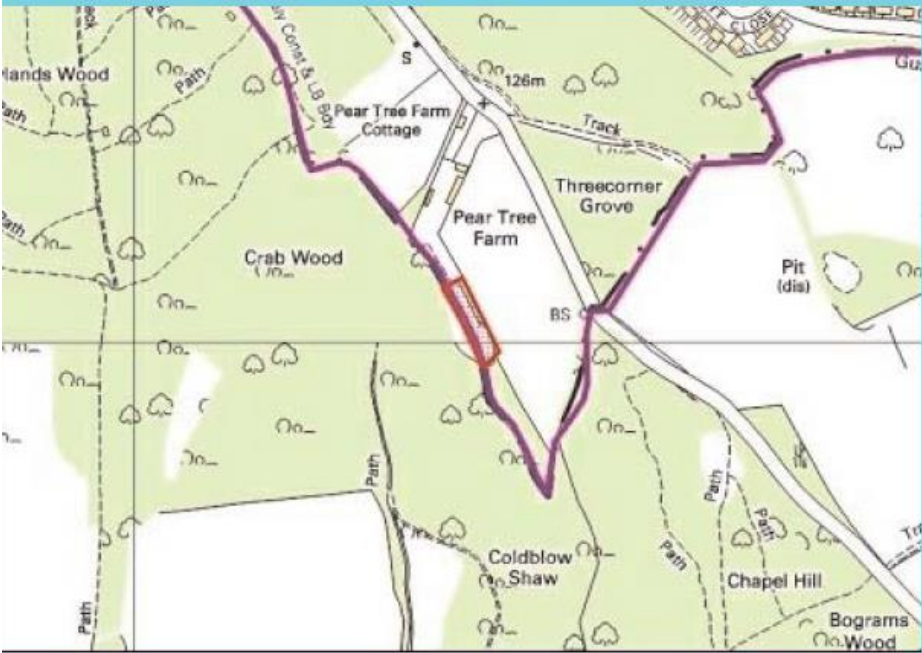
MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>to travel sustainably; ensure improving road safety; <del>reducing</del><b>reduce</b> freight traffic, particularly at peak times, <b><u>facilitate a transition to low emission vehicles and a monitoring regime.</u></b></p> <ul style="list-style-type: none"> <li>• <del>off-site</del><b>post implementation</b> monitoring of emissions <b><u>and reporting of impacts upon</u></b> the water environment, <b><u>particularly for new or intensified waste sites adjacent to main rivers or other watercourses</u></b></li> <li>• <b><u>post implementation monitoring and annual reporting of local air quality and polluting emissions from both on-site waste operations and associated HGV movements in the vicinity of new or intensified waste sites against national air quality objectives and any relevant emissions limits set as part of the planning permission and/or waste license;</u></b></li> </ul>
MM44	40	Policy WP9	<p><b>Policy WP9 Planning Obligations:</b></p> <p>Planning obligations will be used to ensure that all new Waste development or waste redevelopment <b><u>must ensure that where these have off-site impacts, these are addressed to make the development acceptable</u></b> provide that these are mitigated meets on and off site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.</p>
MM45	41	Para 5.54	<p>The South London Waste Plan boroughs recognise that on-going plan monitoring and review are essential to:</p> <ul style="list-style-type: none"> <li>• delivering the objectives of the plan</li> <li>• assessing the implementation of the strategic policies</li> <li>• analysing the effectiveness of policies</li> <li>• <b><u>analysing waste planning permissions and compliance with planning conditions and obligations</u></b></li> </ul>
MM46	41	New para after 5.57	<p><b><u>The South London Waste Plan boroughs will engage with all relevant Duty to Cooperate stakeholders on an ongoing basis in a constructive, an active and an ongoing basis on any relevant strategic matters. A lead borough shall be nominated to carry out this responsibility as and when required.</u></b></p>



MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM47	41	<p>New Paragraphs after 5.58</p> <p>New para</p> <p>New para</p> <p>New para</p> <p>New para</p> <p>New para</p> <p>New para</p>	<p><b><u>In addition to monitoring the implementation of the Plan, it is equally important to ensure the performance of operational waste sites is monitored too. This is the responsibility of a number of parties, namely: The South London Waste Plan Boroughs, the Environment Agency and waste site operators.</u></b></p> <p><b><u>The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit.</u></b></p> <p><b><u>Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). The responsibility for checking compliance falls to the issuer of the permit (the regulator).</u></b></p> <p><b><u>The Environmental Permitting Regulations are the basis for any enforcement action and the principal offences are:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>operating a regulated facility without a permit;</u></b></li> <li>• <b><u>causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and</u></b></li> <li>• <b><u>failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.</u></b></li> </ul> <p><b><u>Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health.</u></b></p> <p><b><u>The South London Waste Plan Boroughs will monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as</u></b></p>

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		New para	<p><b><u>part of the Waste Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.</u></b></p> <p><b><u>In addition, planning legislation gives powers to local authorities to take enforcement action where development has been carried out, either: without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not be delivered. As such, the South London Waste Boroughs' individual Planning Enforcement teams will investigate alleged planning breaches related to waste developments within their respective boroughs. When considering what action to take, if necessary, the Boroughs will have regard to national planning policy and guidance, and any relevant legislation.</u></b></p>
MM48	41	Policy WP10	<p>The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report (<b>AMR</b>) will report <b><u>on the outcome of plan</u></b> the monitoring and the boroughs, in consultation with each other <b><u>and with other relevant Duty to Cooperate bodies as appropriate, such as the GLA, LWARB, EA, the South London Waste Partnership and the waste management industry.</u></b> will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.</p>
MM49	43	How to read the information on Safeguarded Sites	<p><b>Under "Maximum throughput (in tonnes per annum)":</b></p> <p>The maximum throughput achieved by the site in any one year <del>between 2013 and 2017</del> <b><u>in the last five year period, using the latest available information from the Environment Agency Waste Data Interrogator.</u></b> The <del>2019-ItP</del> <b><u>2021</u></b> London Plan recommends that boroughs should use this measure to assess capacity</p>
MM50	44 to 91	Sites Figures	<p>Updated figures in accordance with the Figures set out in the updated Appendix 2 in Annex 1 to this schedule (and as set out in SLWP07)</p>
MM51	45	Site C4 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM52	46	Site C5a	Delete:

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		Opportunity to increase waste managed	"There are no plans by the South London Waste Partnership to intensify operations at this site."
MM53	46	Site C5a Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM54	47	Site C5b Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM55	48	Site C6 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM56	48	Site C6 Issues to consider	<ul style="list-style-type: none"> <li>Designing a facility that <del>does not impact on the openness of Metropolitan Green Belt</del> <b><u>takes into consideration the wider visual or landscape effects to the adjoining countryside.</u></b></li> </ul>
MM57	49	Site C7 Issues to Consider	Add the Tier number to the archaeological consideration: <b><u>"Evaluating and preserving any archaeological remains (Tier 4)"</u></b>
MM58	50	Site C8 Issues to consider	<del>Conserving, and where possible enhancing,</del> <b><u>Ensuring the preservation or enhancement of</u></b> the setting and significance of Airport House, a Grade II* Listed building opposite
MM59	51	Site C9 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM60	51	Site C9 Issues to consider	Developers planning to intensify <b><u>develop</u></b> the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>Designing the site so that operations, <b><u>whether already on site or proposed to be situated in replacement buildings,</u></b> <del>are</del> <b><u>would be</u></b> carried out within fully enclosed building(s) <b><u>that do not impact the openness of the Green Belt/MOL</u></b></li> </ul>

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MM61	51	Site C9 Map	<p>Replace existing site boundary with the site boundary in red on the map below:</p> 
MM62	51	Site C10 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b>Avoiding harm to the living conditions of the occupants of</b> those <b>residential</b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM63	52	Site C10 Issues to consider	<ul style="list-style-type: none"> <li>The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018 <b>and attention should be paid to ensure satisfactory residential amenity of the for any existing and future occupiers of this allocation.</b></li> </ul>
MM64	53	Site C11	<p><b>Delete this site and all reference to it in the Plan</b></p>
MM65	54	Site C12 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b>Avoiding harm to the living conditions of the occupants of</b> those <b>residential</b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>

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MM66	55	Site C13 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b></li> </ul>
MM67	57	Site K2 Issues to consider	Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b>
MM68	58	Site K3 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b></li> </ul>
MM69	59	Site K4 Issues to consider	Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b>
MM70	59	Site K4 Opportunity to increase waste managed	Delete: "No. There are no plans by the South London Waste Partnership to intensify operations at this site."  Replace with " <b><u>Yes</u></b> "
MM71	55	After Site K4 Add new site safeguarding sheet:	<b><u>K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD</u></b>  See Annex 1 to this Schedule for the full site sheet.
MM72	61	Site M1 Issues to consider  Add bullet:	<ul style="list-style-type: none"> <li><b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM73	63	Site M3 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b></li> </ul>
MM74	64	Site M4 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b></li> </ul>
MM75	65	Site M5 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b></li> </ul>



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MM76	66	Site M6 Issues to consider  Amend 9 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Designing a facility that <del>does not impact on the openness of</del> <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>
MM77	66	Site M6 Issues to consider	<p>Insert the following as an additional bullet point under "Issues to consider if there is a further application":</p> <ul style="list-style-type: none"> <li><b><u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u></b></li> </ul>
MM78	67	Site M7 Issues to consider  Add bullet point	<ul style="list-style-type: none"> <li><b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM79	68	Site M8 Issues to consider	<p><del>Protecting the residential amenity</del> <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></b></p>
MM80	69	Site M9 Opportunity to increase waste managed	<p>Delete:</p> <p><del>"No. The plot throughput ration is above the average for this type of facility so there are unlikely to be opportunities to intensify the throughput"</del></p> <p>Add:</p> <p><b><u>"Yes. Although the plot throughput ratio is currently above average for this type of facility any forthcoming planning application seeking opportunities to intensify the throughput would need to demonstrate that the site has the appropriate environmental capacity"</u></b></p>
MM81	69	Site M9 Issues to consider	<ul style="list-style-type: none"> <li><del>Protecting the residential amenity</del> <b><u>Contributing positively to the living conditions</u></b> of those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> </ul>
MM82	70	Site M10 Issues to consider  Amend 7 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Designing a facility that <del>does not impact on the openness of</del> <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM83	70	Site M10 Issues to consider Add bullet point	<ul style="list-style-type: none"> <li>• <b><u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u></b></li> </ul>
MM84	71	Site M11 Issues to consider	<ul style="list-style-type: none"> <li>• Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties</u></b> in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM85	71	Site M11 Issues to consider Amend 7 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>• Designing a facility that <del>does not impact on the openness of</del> <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>
MM86	72	Site M12 Issues to Consider	<ul style="list-style-type: none"> <li>• Protecting the residential amenity of those properties <b><u>(both bricks and mortar and Gypsy and Traveller accommodation)</u></b> in the vicinity of the site, especially with regard to air emissions and noise impacts</li> </ul>
MM87	72	Site M12 Issues to consider Amend 6 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>• Protecting the amenity of <del>those using the future</del> Wandle Valley Regional Park <b><u>and those using it</u></b></li> </ul>
MM88	72	Site M12 Issues to consider Amend 10 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>• Designing a facility that <del>does not impact on the openness of</del> <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>
MM89	73	Site M13 Issues to consider Add bullet	<ul style="list-style-type: none"> <li>• <b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM90	72	Site M14 Issues to consider	<ul style="list-style-type: none"> <li>• Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties</u></b> in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM91	72	Site M14 Issues to consider Amend 8 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>• Designing a facility that <del>does not impact on the openness of</del> <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>
MM92	74	Site M14	

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
		Issues to consider Add bullet	<ul style="list-style-type: none"> <li><b><u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u></b></li> </ul>
MM93	75	Site M15 Issues to consider	<p>Delete "Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</p> <p><b><u>Replace with: Conserving, and where possible enhancing, significance of the adjacent Wandle Valley Conservation Area</u></b></p>
MM94	75	Site M15 Issues to consider Amend 8 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Designing a facility that does not impact on the openness of <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>
MM95	75	Site M15 Issues to consider	<p>Insert the following as an additional bullet point under "Issues to consider if there is a further application":</p> <ul style="list-style-type: none"> <li><b><u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u></b></li> </ul>
MM96	75	Site M15 Issues to consider Add bullet	<ul style="list-style-type: none"> <li><b><u>Contributing positively to the living conditions of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM97	76	Site M16 Issues to consider	<p>Delete "Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</p> <p><b><u>Replace with: Conserving, and where possible enhancing, the significance of the Wandle Valley Conservation Area</u></b></p>
MM98	76	Site M16 Issues to consider  Add bullet	<ul style="list-style-type: none"> <li><b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM99	76	Site M16 Issues to consider Amend 8 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Designing a facility that does not impact on the openness of <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u></b></li> </ul>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM100	76	Site M16 Issues to consider Amend final bullet point	<ul style="list-style-type: none"> <li>Protecting the amenity of <del>those using the future</del> Wandle Valley Regional Park <b><u>and those using it</u></b></li> </ul>
MM101	77	Site M17 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM102	78	Site M18 Issues to consider  Add bullet	<ul style="list-style-type: none"> <li><b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM103	80	Site S1 777 Recycling Centre	Delete Site <b><u>S1 '777 Recycling Centre'</u></b> and any other references to it in the Plan
MM104	81	Site S2 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM105	81	Site S2 Issues to consider Add bullet	<ul style="list-style-type: none"> <li><b><u>Undertaking an air quality assessments and transport assessments in accordance with the requirements of Policy WP5</u></b></li> </ul>
MM106	81	Site S2 Amend 5 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Protecting the amenity of <del>those using the future</del> Wandle Valley Regional Park <b><u>and those using it</u></b></li> </ul>
MM107	81	Site S3 Amend 5 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Protecting the amenity of <del>those using the future</del> Wandle Valley Regional Park <b><u>and those using it</u></b></li> </ul>
MM108	81	Site S3 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of</u></b> those <b><u>residential</u></b> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM109	82	Site S3 Amend 8 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Designing a facility that <del>does not impact on the openness of</del> <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land.</u></b></li> </ul>
MM110	83	Site S4 Issues to consider  Add bullet	<ul style="list-style-type: none"> <li><b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM111	86	Site S7 Issues to consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties</u></b> in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM112	86	Site S7 Amend 6 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Designing a facility that does not impact on the openness of <b><u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land.</u></b></li> </ul>
MM113	88	Site S9 Issues to consider  Add bullet	<ul style="list-style-type: none"> <li><b><u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u></b></li> </ul>
MM114	89	Site S10 Issues to Consider	<ul style="list-style-type: none"> <li>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li><b><u>Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</u></b></li> </ul>
MM115	89	Site S10 Issues to Consider New bullet:	<ul style="list-style-type: none"> <li><b><u>Evaluating and preserving any archaeological remains</u></b></li> </ul>
MM116	90	Site S11 TGM	Delete Site S11 TGM Environment from the schedule of safeguarded sites, Appendix 2 and any other references to the site in the Plan.
MM117	91	Site S12 Issues to Consider	<ul style="list-style-type: none"> <li>Protecting the residential amenity <b><u>Avoiding harm to the living conditions of the occupants of those residential properties</u></b> in the vicinity of the site, especially with regard to air emissions and noise impacts.</li> </ul>
MM118	91	Site S12 Issues to Consider Amend 5 <sup>th</sup> bullet point	<ul style="list-style-type: none"> <li>Protecting the amenity of those using the future Wandle Valley Regional Park <b><u>and those using it</u></b></li> </ul>
MM119	91	Site S12	Amend 9 <sup>th</sup> bullet point:



MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification						
			<ul style="list-style-type: none"> <li>Designing a facility that does not impact on the openness of <b><u>takes into consideration the wider visual or landscape effect of the adjoining Metropolitan Open Land.</u></b></li> </ul>						
MM120	93	Appendix 1 Monitoring Table	Modify the Monitoring and Contingencies Table in accordance with Annex 2.						
MM121	99	Appendix 2	Update Appendix 2 in accordance with Annex 3 to this Schedule of Main Modifications						
MM122	102	Appendix 3 Ref 21 '777 Recycling'	<del>Safeguarding carried forward as Site S1</del> <b><u>The throughput of the site has significantly declined and the operator is planning to cease operations due to viability. Capacity from site no longer required to meet the waste apportionment.</u></b>						
MM123	104	Appendix 4 Glossary	<p><b>Additions to the Glossary:</b></p> <p><b><u>Consented Waste Site: A site that has planning permission for a new waste management facility or an existing site that has planning permission where an increase in intensification is permitted, for example where:</u></b></p> <ul style="list-style-type: none"> <li><b><u>longer operating times are permitted on the existing site; and/or additional storage, machinery, buildings, parking or access roads are permitted on the existing site; and/or</u></b></li> <li><b><u>the boundary of the site is extended to allow for either of the above.</u></b></li> </ul> <p><b><u>Existing Waste Site: A waste site that is materially in operation as a waste site</u></b></p> <p><b><u>Safeguarded Waste Site: A site that is safeguarded for waste uses. This may include sites that are materially operational as waste facilities, vacant waste facilities or vacant plots of land that are safeguarded for waste.</u></b></p>						
MM124	106	New Appendix 5	<p>Add: <b><u>Appendix 5 South London Waste Plan 2012 Superseded Policies</u></b></p> <table border="1"> <thead> <tr> <th>Adopted SLWP (2012) Policies to be Superseded</th> <th>Replacement Policies in the Draft SLWP</th> </tr> </thead> <tbody> <tr> <td colspan="2"><b>Strategic Policies</b></td> </tr> <tr> <td><b>WP1:</b> Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste</td> <td><b>WP1:</b> Strategic Approach to Household and Commercial and Industrial Waste</td> </tr> </tbody> </table>	Adopted SLWP (2012) Policies to be Superseded	Replacement Policies in the Draft SLWP	<b>Strategic Policies</b>		<b>WP1:</b> Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste	<b>WP1:</b> Strategic Approach to Household and Commercial and Industrial Waste
Adopted SLWP (2012) Policies to be Superseded	Replacement Policies in the Draft SLWP								
<b>Strategic Policies</b>									
<b>WP1:</b> Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste	<b>WP1:</b> Strategic Approach to Household and Commercial and Industrial Waste								

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification	
			<b>WP2:</b> Strategic Approach to Other Forms of Waste	<b>WP2:</b> Strategic Approach to Other Forms of Waste
			<b>Non-Strategic Policies</b>	
			<b>WP3:</b> Existing Waste Sites	<b>WP3:</b> Existing Waste Sites
			<b>WP4:</b> Industrial Areas with Sites Suitable for Waste Facilities	The draft Plan proposes no new sites, unless for compensatory provision. As such the adopted Policy WP4 would be deleted on adoption of the draft Plan
			<b>WP5:</b> Windfall Sites and Non MSW and C&I Waste Location Criteria	<b>WP4:</b> Sites for Compensatory Provision.
			<b>WP6:</b> Sustainable Design and Construction of Waste Facilities	<b>WP6:</b> Sustainable Construction and Design of Waste Facilities
			<b>WP7:</b> Protecting and Enhancing Amenity	<b>WP5:</b> Protecting and Enhancing Amenity
			<b>WP8:</b> Sustainable Energy Recovery	<b>WP7:</b> The Benefits of Waste The draft Plan does not support additional Energy from Waste facilities, as set out in draft Policy WP7.
			<b>WP9:</b> Planning Obligations	<b>WP9:</b> Planning Obligations <b>WP10:</b> Monitoring and Contingencies

**Annex 1:** New Safeguarded Site Sheet for 'K5 Chessington Railhead'

**Annex 2:** Modified Appendix 1 - Monitoring and Contingency Table

**Annex 3:** Modified Appendix 2 - Sites counting towards the Apportionment and C&D Target

# Annex 1 - South London Waste Plan - Draft Safeguarded Site

**K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD**



Site size (ha)	1.7
Type of facility	Waste Transfer Station

<b>Type of waste</b>	N/a
<b>Maximum throughput tonnes per annum (tpa)</b>	N/a
<b>Qualifying throughput (tpa)</b>	N/a
<b>Licensed capacity (tpa)</b>	N/a
<b>Site Description</b>	<p>Former coal and fuel depot. The existing site is laid with hardstanding and accommodates rail sidings, a number of large storage buildings, site office, parking and weighbridge. The site is located in proximity to residential properties to the north east, along Garrison Lane.</p> <p>The landowners and leaseholders are both statutory railway undertakers and have confirmed that the site is being brought forward under rail related permitted development rights to facilitate the transfer of freight by rail. A minerals and waste operator has been appointed and granted a 25 year under-lease subject to the site being in rail use.</p>
<b>Planning Designations</b>	South of the Borough Neighbourhood Policy (Policy SB1 of the Core Strategy 2012)
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	Yes. Minerals and waste transfer operations are currently being progressed under rail related permitted development rights. As such, this will be a dual-use site, with minerals operations within the site. The size of the site may allow an opportunity to co-locate.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>• Designing the site so that operations are carried out within a fully enclosed building</li> <li>• Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>• Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>• Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>• Not harming biodiversity in the vicinity, including the Green Lane Site of Importance for Nature Conservation</li> <li>• Providing appropriate soft landscaping</li> <li>• Not prejudicing the minerals operations on site which are a complementary use</li> <li>• Designing a facility that takes into consideration its wider visual or landscape effect on the adjoining Green Belt.</li> </ul>

## Annex 2 – Modifications to Plan Appendix 1 Monitoring and Contingencies

### Policy WP1 – Strategic Approach to household and commercial and industrial (HCI) waste

<b>Indicator 1.1: MANAGEMENT OF HCI WASTE</b>	<b><u>Household, commercial and industrial (HCI) waste managed within the plan area against the combined London Plan 2021 apportionment (tonnes per annum)</u></b>
<b>Indicator 1 (for Policy WP1)</b>	<b><del>Household and Commercial and Industrial Waste Managed</del></b>
<b>Target</b>	By 2036, 929,750 <b>932,800</b> tonnes per annum <b>by 2037 (meet combined apportionment for HCI waste)</b>
<b>References What it monitors</b>	<del><b>London Plan Policy: SI 8</b></del> <b><u>SLWP Vision: Net self-sufficiency for HCI Waste</u></b> <b><u>SLWP Plan Objectives: 1, and 3 and 4 and 8</u></b> <b><u>SLWP Policy WP1</u></b> <b><u>SA Objectives: 1, 2, 4, 9, 10 and 13</u></b>
<b>Monitoring</b>	Monitor annually against <b>HCI</b> target <b><u>using the Environment Agency’s Waste Data Interrogator (WDI)</u></b> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline <b><u>in any extant planning permissions</u></b> <b><u>Monitor the net change in the amount of available industrial land (Class B and Class E(q)) within strategic industrial locations (SILs) and locally significant industrial locations (LSILs) as a result of waste development using the GLA’s Planning London Datahub</u></b> <b><u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u></b> <b><u>Report in the Waste Authority Monitoring Report</u></b>
<b>Outcomes sought</b>	<b><u>That the South London Waste Plan area has sufficient capacity to meet the HCI apportionment and achieves net self-sufficiently sufficiency to 2036</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry and <b><u>Duty to Cooperate partners</u></b>



<b>Management Actions</b>	<p><b>Sites closing</b> – Contact landowners/developers/ to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB <b>and</b> EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output.</p> <p><b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify this failure. <b><u>Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work. Possibly revise Consider reviewing the</u></b> South London Waste Plan to provide more sites in light of evidence.</p> <p><b><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work. Possibly revise Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that do the issue can be considered strategically.</u></b></p>
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### **Policy WP2 – Strategic Approach to other forms of waste**

<b><u>Indicator 2.1: MANAGEMENT OF C&amp;D WASTE</u></b>	<b><u>C&amp;D waste managed within the plan area against forecast arisings (tonnes per annum)</u></b>
<b><u>Indicator 2 (for Policy WP2)</u></b>	<b><u>Construction and Demolition Waste Managed</u></b>
<b><u>Target 2.1</u></b>	By 2036, 414,380 <b><u>415,019</u></b> tonnes per annum <b><u>by 2037 (net self-sufficiency for C&amp;D waste)</u></b>
<b><u>References</u></b> <b><u>What it monitors</u></b>	<b><u>London Plan Policy: SI-8</u></b> <b><u>SLWP Vision: Net self-sufficiency for C&amp;D Waste</u></b> <b><u>SLWP Plan Objective: 2 and, 3 and 4</u></b> <b><u>SLWP Policy WP2</u></b> <b><u>SA Objectives: 1, 2, 4, 9, 10 and 13</u></b>
<b><u>Monitoring</u></b>	Monitor annually against <b><u>C&amp;D</u></b> target <b><u>using the Environment Agency’s waste data interrogator (WDI)</u></b> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline <b><u>in any extant planning permissions</u></b>

	<p><b><u>Monitor the net change in the amount of available industrial land (Class B and Class E(g)) within strategic industrial locations (SILs) and locally significant industrial locations (LSILs) as a result of waste development using the GLA's Planning London Datahub</u></b></p> <p><b><u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u></b></p> <p><b><u>Report in the Waste Authority Monitoring Report</u></b></p>
<b><u>Outcomes sought</u></b>	<b><u>That the South London Waste Plan area has sufficient capacity to meet forecast C&amp;D waste arisings and achieves net self-sufficiently sufficiency to 2036</u></b>
<b><u>Delivery Partners</u></b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <b><u>and Duty to Cooperate partners</u></b>
<b><u>Management Actions</u></b>	<p><b><u>Sites closing</u></b> – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p><b><u>Compensatory provision not delivered</u></b> – Analyse the boroughs' Development Management procedures to identify this failure. <b><u>Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work.</u></b> Possibly revise South London Waste Plan to provide more sites in light of evidence</p> <p><b><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work. Possibly revise South London Waste Plan in light of evidence do the issue can be considered strategically.</u></b></p>
<b><u>Indicator 2.2: MANAGEMENT OF OTHER WASTE STREAMS</u></b>	<b><u>Number of planning permissions for new radioactive, agricultural or hazardous waste Facilities (either transfer or management)</u></b>
<b><u>Indicator 3 (for Policy WP2)</u></b>	<b><u>Radioactive, Agricultural and Hazardous Waste Treated</u></b>
<b><u>Target</u></b>	<p><del>0 permissions</del> <b><u>Hazardous Waste: 21,692 tonnes per annum by 2037</u></b></p> <p><b><u>Agricultural Waste: 383 tonnes per annum</u></b></p> <p><b><u>Radioactive Waste: N/a</u></b></p>

<p><b>References</b> <b>What it monitors</b></p>	<p><b><u>SLWP Vision: Net self-sufficiency for other waste streams</u></b> <b><u>SLWP</u></b> Plan Objective: 2 <b>and 4</b> <b><u>SLWP Policy WP2(d)</u></b> SA Objective: 1</p>
<p><b>Monitoring</b></p>	<p>Monitor annually against targets <b><u>using the Environment Agency’s waste data interrogator (WDI)</u></b> <b><u>Monitor planning applications annually using the GLA’s Planning London Datahub</u></b> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity <del>in the planning pipeline</del> <b><u>in any extant planning permissions</u></b> <b><u>Monitor the net change in the amount of industrial land (Class B and Class E(g)) as a result of waste development using the GLA’s Planning London Datahub</u></b> <b><u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u></b> <b><u>Report in the Waste Authority Monitoring Report (AMR)</u></b></p>
<p><b>Outcomes sought</b></p>	<p><b><u>That waste arisings from other waste streams are managed without the need for additional facilities within the South London Waste Plan area, unless the requirements of WP2 (d) are met.</u></b></p>
<p><b>Delivery Partners</b></p>	<p>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <b><u>Duty to Cooperate partners</u></b></p>
<p><b>Management Actions</b></p>	<p><b><u>Sites permitted – If new facilities are being delivered on ‘windfall sites’, because safeguarded sites are not being assessed as deliverable, then investigate the reasons why. Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work</u></b> Analyse the boroughs’ Development Management procedures to identify this failure. Examine whether there is any unidentified need for these streams of waste. Possibly revise <b><u>Consider reviewing the</u></b> South London Waste Plan in <b><u>the</u></b> light of evidence.  <b><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work.</u></b> Possibly revise <b><u>Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that <del>do</del> the issue can be considered strategically.</u></b></p>

## **Policy WP3 – Existing Waste Sites**

<b>INDICATOR 3.1: OPERATION OF WASTE SITES</b>	<b>Proportion of safeguarded waste sites <del>to be</del> which are operational or to have had compensatory provision provided (%)</b>
<b>Indicator 4 (for Policy WP3 &amp; WP4)</b>	<b><del>Existing Waste Sites Safeguarded</del></b>
<b>Target</b>	100% of safeguarded <del>existing</del> waste sites to be operational or to have compensatory provision provided
<b>References What it monitors</b>	<del>London Plan Policy: SI 8</del> <b><u>SLWP Vision: Managing waste efficiently and effectively</u></b> <b><u>SLWP Plan Objectives: 1, 2, 3 and 4 and 8</u></b> <b><u>SLWP Policy WP3 (a to d)</u></b> SA Objective: 1, <b><u>2 and 9</u></b>
<b>Monitoring</b>	Monitor annually against target <b><u>using the GLA’s Planning London Datahub</u></b> <b><u>Monitor the net change in the amount of industrial land (Class B and Class E(g)) as a result of compensatory provision using the GLA’s Planning London Datahub</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b>Outcomes sought</b>	<b><u>That the South London Waste Plan area has sufficient capacity to meet the London Plan apportionment waste targets and meet and achieve net self-sufficiency, while retaining sufficient industrial land and premises within designated SILS and LSILs across the plan area to meet future demand for other non-waste industrial uses</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	<b>Sites closing</b> – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output  <b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. <b><u>Undertake or commission updated assessments of</u></b>

	<p><b><u>site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work.</u></b> Possibly revise South London Waste Plan to provide more sites in light of evidence.</p> <p><b><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work.</u></b> Possibly revise <b><u>Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that <del>de</del> the issue can be considered strategically.</u></b></p>
<b>NEW INDICATOR 3.2: INTENSIFICATION OF WASTE SITES</b>	<b><u>Number and proportion of safeguarded waste sites which have been intensified over the plan period and the increase in average throughput per hectare</u></b>
<b><u>Target</u></b>	<b><u>To increase the efficiency of waste management operations across the South London Waste Plan area in terms of the average throughput of waste managed per hectare (by waste stream and based on a rolling three-year average)</u></b>
<b><u>What it monitors</u></b>	<p><b><u>SLWP Vision: Managing waste efficiently and effectively</u></b></p> <p><b><u>SLWP Plan Objective: 4, 7 8 and 9</u></b></p> <p><b><u>SLWP Policy WP3 (b)</u></b></p> <p><b><u>SLWP Policy WP7</u></b></p> <p><b><u>SA Objectives: 3 and 4</u></b></p>
<b><u>Monitoring</u></b>	<p><b><u>Monitor annually against target using the GLA's Planning London Datahub</u></b></p> <p><b><u>Report in Waste Authority Monitoring Report</u></b></p>
<b><u>Outcomes sought</u></b>	<p><b><u>To promote the efficient use of industrial land for waste management purposes across the South London Waste Plan area;</u></b></p> <p><b><u>To support the circular economy and minimise waste movements within the South London Waste Plan area by facilitating the co-location of complementary waste and/or industrial uses</u></b></p> <p><b><u>To retain sufficient industrial land and premises within designated SILS and LSILs across the SLWP area to meet future demand for other non-waste industrial uses (Class B and Class E[g]) and to maintain a sufficient level of vacant land necessary for 'churn' and a functioning land market.</u></b></p>



<b><u>Delivery Partners</u></b>	<b><u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u></b>
<b><u>Management Actions</u></b>	<b><u>Waste developments moving down the waste hierarchy - Analyse the boroughs' Development Management procedures to identify whether this is a systematic or isolated failure. Consider reviewing the South London Waste Plan to provide more sites in light of evidence.</u></b>
<b><u>INDICATOR 3.3: WASTE HIERARCHY</u></b>	<b><u>Proportion of developments on safeguarded waste sites which result in waste being managed to at least the same level in the waste hierarchy as prior to the development (%)</u></b>
<b><u>Indicator 4 (for Policy WP3 &amp; WP4)</u></b>	<b><u>Existing Waste Sites Safeguarded</u></b>
<b><u>Target</u></b>	<b><u>100% of developments on safeguarded waste sites which result in waste being managed to at least the same level in the waste hierarchy as prior to the development</u></b>
<b><u>References What it monitors</u></b>	<b><u>London Plan Policy: SI-8</u></b> <b><u>SLWP Vision: Managing waste efficiently and effectively</u></b> <b><u>SLWP Plan Objective: 4, 7 8 and 9</u></b> <b><u>SLWP Policy WP3 (e)</u></b> <b><u>SLWP Policy WP7</u></b> <b><u>SA Objectives: 3 and 4</u></b>
<b><u>Monitoring</u></b>	<b><u>Monitor annually against target using the GLA's Planning London Datahub</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>To move waste management practices within the South London Waste Plan area up the waste hierarchy.</u></b>
<b><u>Delivery Partners</u></b>	<b><u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u></b>
<b><u>Management Actions</u></b>	<b><u>Sites closing — Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste</u></b>

	<p><del>management output. If isolated, work with landowners/developers to facilitate waste management output</del></p> <p><del>Compensatory provision not delivered — Analyse the boroughs' Development Management procedures to identify whether this is a systematic or isolated failure. Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work. Possibly revise South London Waste Plan to provide more sites in light of evidence.</del></p> <p><del>Waste developments moving down the waste hierarchy - Analyse the boroughs' Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise Consider reviewing the South London Waste Plan to provide more sites in light of evidence.</del></p>
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#### Policy WP4 – Sites for Compensatory Provision

<b>Indicator 4.1: COMPENSATORY SITES</b>	<b><u>The amount of waste managed at compensatory sites compared to the amount of waste previously managed at the corresponding safeguarded sites which have been lost to other uses (tonnes per annum – based on three year rolling average for all waste streams)</u></b>
<b>Indicator 4 (for Policy WP3 &amp; WP4)</b>	<b><del>Existing Waste Sites Safeguarded</del></b>
<b><u>Target</u></b>	<b><u>100% of compensatory sites manage at least the same amount of waste as previously managed at the corresponding safeguarded site (based on three year rolling average for all waste streams)</u></b>
<b><u>References What it monitors</u></b>	<p><del>London Plan Policy: SI 8</del></p> <p><b><u>SLWP Vision: Net self-sufficiency</u></b></p> <p><b><u>SLWP Plan Objective: 1 and 2 and 4</u></b></p> <p><b><u>SLWP Policy WP4</u></b></p> <p><b><u>SA Objective: 1</u></b></p>
<b><u>Monitoring</u></b>	<p><b><u>Monitor annually against target using the Environment Agency's waste data interrogator (WDI), borough development monitoring procedures and the GLA's Planning London Datahub</u></b></p> <p><b><u>Monitor the net change in the amount of industrial land (Class B and Class E(g)) as a result of waste development using the GLA's Planning London Datahub</u></b></p>

	<b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That the South London Waste Plan area has sufficient capacity to meet waste targets and net self-sufficiently.</u></b>
<b><u>Delivery Partners</u></b>	<b><u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, Duty to Cooperate partners</u></b>
<b><u>Management Actions</u></b>	<p><b><u>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</u></b></p> <p><b><u>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise South London Waste Plan to provide more sites in light of evidence.</u></b></p> <p><b><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work. Possibly revise Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that <del>de</del> the issue can be considered strategically.</u></b></p>

## **Policy WP5 – Protecting and enhancing amenity**

<b>INDICATOR 5.1: FULLY-ENCLOSED, COVERED WASTE FACILITIES</b>	<b>The proportion of planning permissions for intensified or compensatory waste facilities with a fully enclosed covered building (%)</b>
<b>Indicator 5 (for Policy WP5(b))</b>	<b>Compensatory or Intensified Sites with Fully Enclosed Covered Building</b>
<b>Target</b>	100% of <b>planning</b> permissions <b>for intensified or compensatory waste facilities have the parts of the site where unloading, loading, storage and processing takes place within a fully enclosed covered building</b>
<b>References What it monitors</b>	<b>SLWP Vision: Operational effects of sites are mitigated</b> <b>SLWP</b> Plan Objective: 6 <b>and 9</b> <b>SLWP Policy WP5(b)</b> SA Objective: 11 <b>and 15</b>
<b>Monitoring</b>	Monitor annually against target <b>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</b> <b>Report in Waste Authority Monitoring Report</b>
<b>Outcomes sought</b>	<b>That the South London Waste Plan protects and enhances amenity</b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b>South London Waste Partnership</b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why <b>proposals on</b> sites without a fully enclosed covered building <b>on the parts of site where unloading, loading, storage and processing takes place</b> have not been permitted. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence
<b>INDICATOR 5.2: PROTECTION OF GREEN BELT, MOL AND OPEN SPACE</b>	<b>Number and site area of planning permissions for intensified or compensatory waste facilities located on Green Belt, Metropolitan Open Land and open space (number/hectares)</b>

<b>Indicator 6 (for Policy WP5(e))</b>	<b>Development on Green Belt, Metropolitan Open Land and Open Space</b>
<b>Target</b>	<b>0 planning permissions for intensified or compensatory waste facilities located</b> on Green Belt, Metropolitan Open Land (MOL) and Open Space <b>(0 ha)</b>
<b>References What it monitors</b>	<b><u>SLWP Vision: Operational effects of sites are mitigated</u></b> <b><u>SLWP Policy WP5(b) (c)(i)</u></b> Plan Objectives: <b><u>5, 6 and 9</u></b> SA Objectives: <b><u>6, 14, 15 and 16</u></b>
<b>Monitoring</b>	Monitor annually against target <b><u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b>Outcomes sought</b>	<b><u>That waste development is directed to suitable locations and the Green Belt / Metropolitan Open Land is protected from inappropriate development.</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites on Green Belt, Metropolitan Open and Open Space have been permitted.  Possibly revise South London Waste Plan in light of evidence
<b>INDICATOR 5.3: PROTECTION OF NATURE CONSERVATION AREAS</b>	<b><u>Number and site area of planning permissions for intensified or compensatory waste facilities located on nationally, regionally or locally designated nature conservation areas (number/hectares)</u></b>
<b>Indicator 7 (for Policy WP5(e))</b>	<b>Development on Nationally, Regionally or Locally Designated Nature Conservation Areas</b>
<b>Target</b>	0 ha of development on <b><u>0 planning permissions for intensified or compensatory waste facilities located</u></b> on nationally, regionally or locally designated nature conservation areas <b>(0 ha)</b>
<b>References What it monitors</b>	<b><u>SLWP</u></b> Plan Objective: 6 <b><u>and 9</u></b>



	<b><u>SLWP Policy WP5(c)(ii)</u></b> SA Objective: 12
<b>Monitoring</b>	Monitor annually against target <b><u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That waste development is directed to suitable locations outside nationally, regionally or locally designated nature conservation areas.</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), <b><u>Green Space Information for Greater London (GiGL)</u></b> , London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <b><u>and Natural England</u></b>
<b>Management Actions</b>	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why sites with nationally, regionally or locally designated Nature Conservation Areas have been permitted. Possibly revise <b><u>Consider reviewing the</u></b> South London Waste Plan in light of evidence
<b><u>NEW INDICATOR 5.4: BIODIVERSITY NET GAIN</u></b>	<b><u>Number and proportion of intensified or compensatory waste facilities achieving 'biodiversity net gain' as measured by the latest metric published by DEFRA (number/%)</u></b>
<b><u>Target</u></b>	<b><u>100% of planning permissions for intensified or compensatory waste facilities achieve 'biodiversity net gain' on or offsite in line with London Plan Policy G6, Mayoral Guidance and the relevant borough policy</u></b>
<b><u>What it monitors</u></b>	<b><u>SLWP Plan Objective: 5, 6 and 9</u></b> <b><u>SLWP Policy WP5(c)(ii)</u></b> <b><u>SA Objective: 12</u></b>
<b>Monitoring</b>	<b><u>Developers to assess and report on biodiversity net gain in line with London Plan Policy G6, Mayoral Guidance and the relevant borough policy using the latest biodiversity metric published by DEFRA (Biodiversity Net Gain 3.0 is expected by the end of 2021)</u></b>

	<b><u>Monitor annually against target using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That the development of intensified or compensatory waste facilities within the South London Waste Plan area leaves biodiversity and habitats in a better state than before</u></b>
<b><u>Delivery Partners</u></b>	<b><u>Greater London Authority (GLA), Green Space Information for Greater London (GiGL), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry and Natural England</u></b>
<b><u>Management Actions</u></b>	<b><u>Analyse the boroughs' development management procedures to identify any failure to enforce the relevant planning conditions of legal agreements around biodiversity accounting</u></b> <b><u>Consider reviewing the South London Waste Plan in light of evidence</u></b>
<b><u>INDICATOR 5-4 5: CONSERVATION AREAS</u></b>	<b><u>Number and site area of planning permissions for intensified or compensatory waste facilities located within Conservation Areas (number/hectares)</u></b>
<b><u>Indicator 8 (for Policy WP5(c))</u></b>	<b><u>Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas</u></b>
<b><u>Target</u></b>	0 ha of development on <b><u>0 planning permissions for intensified or compensatory waste facilities located within Conservation Areas (0 ha)</u></b>
<b><u>References</u></b> <b><u>What it monitors</u></b>	<b><u>SLWP Policy WP5(c)(iii)</u></b> Plan Objective: <b><u>5, 6 and 9</u></b> SA Objective: 14
<b><u>Monitoring</u></b>	Monitor annually against target <b><u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That waste development does not cause harm to the historic environment.</u></b>
<b><u>Delivery Partners</u></b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <b><u>and Historic England</u></b>

<b>Management Actions</b>	<p>Analyse the boroughs' Development Management procedures to identify any failure.</p> <p>Examine whether there are specific reasons why sites within <del>Nationally, Regionally or Locally Designated Heritage</del> Conservation Areas have been permitted.</p> <p>Possibly revise <del>Consider reviewing the</del> South London Waste Plan in <del>the</del> light of evidence</p>
<b><u>INDICATOR 5.6 <del>5:</del> FLOOD RISK, RIVER QUALITY AND GROUNDWATER</u></b>	<p><b><u>5.6.1 Number and proportion of planning permissions for intensified or compensatory waste facilities waste developments granted planning permission against Environment Agency advice relating to fluvial flood risk, maintaining the natural floodplain, river quality (chemical and ecological) and groundwater source protection zones (SPZs) <del>groundwater risk and air emissions (%)</del>.</u></b></p> <p><b><u>5.6.2 Number and proportion of waste facilities incorporating buildings or structures within 8 metres of a main river or within 5 metres of an ordinary watercourse;</u></b></p> <p><b><u>5.6.3 Number and proportion of waste facilities incorporating buildings or structures located within EA Flood Zones 2 or 3;</u></b></p> <p><b><u>5.6.4 Water quality objectives (chemical and ecological) for each of the main rivers within the South London Waste Plan area set out in the EA's Thames River Basin Management Plan 2015-21 as amended;</u></b></p> <p><b><u>5.6.5 Number and proportion of waste facilities located within EA groundwater source protection zones (SPZ1 inner; SPZ2 outer and SPZ3 total catchment).</u></b></p>
<b>Indicator 9 (for Policy WP5(c))</b>	<b><del>Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)</del></b>
<b>Target</b>	<p><del>0 ha of development</del> <b><u>0 planning permissions for intensified or compensatory waste facilities waste developments granted planning permission permitted</u></b> against Environment Agency advice</p> <p><b><u>0 planning permissions for intensified or compensatory waste facilities incorporate buildings or structures within 8 metres of a main river or within 5 metres of an ordinary watercourse;</u></b></p> <p><b><u>0 planning permissions for intensified or compensatory waste facilities incorporate buildings or structures within 8 metres of a main river or within 5 metres of an ordinary watercourse</u></b></p> <p><b><u>Each of the main rivers within the South London Waste Plan area is assessed as having 'good' chemical and 'good' ecological status.</u></b></p>

	<b><u>0 planning permissions located within EA groundwater source protection zones (SPZ1 inner; SPZ2 outer and SPZ3 total catchment).</u></b>
<b><u>References</u></b> <b><u>What it monitors</u></b>	<b><u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u></b> <b><u>SLWP Plan Objectives: 5, 6 and 9</u></b> <b><u>SLWP Policy WP5(c)(v)</u></b> SA Objective: <b><u>6, 7, 8, 11 and 15</u></b>
<b><u>Monitoring</u></b>	Monitor annually against target <b><u>using the relevant borough development monitoring procedures, and the GLA's Planning London Datahub and Environment Agency river quality monitoring data</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That waste development contributes to reduce the impacts of climate change, and does not cause harm to the environment and communities by increasing flood risk or adversely affecting river or groundwater quality.</u></b>
<b><u>Delivery Partners</u></b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <b><u>South East Rivers Trust (formerly Wandle Trust)</u></b>
<b><u>Management Actions</u></b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted contrary to Environment Agency advice. <b><u>Possibly revise South London Waste Plan in light of evidence</u></b>
<b><u>INDICATOR 5.7: AIR QUALITY INDICATORS</u></b>	<b><u>5.7.1 NITROGEN DIOXIDE (NO<sub>2</sub>): Monitored NO<sub>2</sub> levels at roadside locations adjacent to or in close proximity to operational waste sites (µg/m<sup>3</sup>)</u></b> <b><u>5.7.2 PARTICULATES (PM10): Monitored PM10<sup>1</sup> levels at roadside locations adjacent to or in close proximity to operational waste sites (µg/m<sup>3</sup>)</u></b> <b><u>5.7.3 AIR QUALITY FOCUS AREAS : number and proportion of planning permissions for intensified or compensatory waste facilities located within or in close proximity to Air Quality Focus Areas</u></b>

<sup>1</sup> PM10s = particulate matter less than 10 microns in size

	<p><b><u>5.7.4 AIR QUALITY NEUTRALITY: Number and proportion of planning permissions for intensified or compensatory waste facilities achieving 'Air Quality Neutral' benchmarks as defined by the Mayor<sup>2</sup></u></b></p> <p><b><u>5.7.5 POST IMPLEMENTATION MONITORING: Number and proportion of planning permissions for intensified or compensatory waste facilities which incorporate conditions and/or legal agreements to secure arrangements for post-implementation monitoring and annual reporting of local air quality and polluting emissions;</u></b></p> <p><b><u>5.7.6 ENFORCEMENT ACTION: Number of enforcement actions taken against waste sites by the Boroughs and/or Environment Agency on breach of planning permissions, conditions or environmental permits</u></b></p>
<p><b><u>Targets</u></b></p>	<p><b><u>5.7.1 NITROGEN DIOXIDE (NO<sub>2</sub>): 40 µg/m<sup>3</sup> as an annual mean and 200 µg/m<sup>3</sup> as a 1-hour mean exceeded no more than 18 days per year based on both automatic monitoring sites forming part of the London Air Quality Network (LAQN) and any non-automatic diffusion tube networks either run by the relevant borough.</u></b></p> <p><b><u>5.7.2 PARTICULATES (PM10): 40 µg/m<sup>3</sup> as an annual mean and 50 µg/m<sup>3</sup> as a 24-hr mean not to be exceeded more than 35 days/year)</u></b></p> <p><b><u>5.7.3 AIR QUALITY FOCUS AREAS: 0 planning permissions for intensified or compensatory waste facilities located within or adjacent in close proximity to Air Quality Focus Areas</u></b></p> <p><b><u>5.7.4 AIR QUALITY NEUTRALITY: 100% of planning permissions for intensified or compensatory waste facilities achieve 'Air Quality Neutral' benchmarks as defined by the Mayor<sup>3</sup></u></b></p> <p><b><u>5.7.5 POST IMPLEMENTATION MONITORING: Where necessary and where the tests set out in National Planning Practice Guidance (NPPG) for the use of planning obligations are met, 100% of planning permissions for intensified or compensatory waste facilities include conditions and/or legal agreements to secure arrangements for post-implementation monitoring and annual reporting of local air quality and polluting emissions;</u></b></p> <p><b><u>5.7.6 ENFORCEMENT ACTION: Enforcement investigation is undertaken by the Boroughs and/or Environment Agency in 100% of cases where a breach of planning control or environmental permit is reported</u></b></p>

<sup>3</sup> 'air quality neutral' standards are defined in the Mayor's supplementary planning guidance (SPG) on Sustainable design and Construction (GLA, 2014)



<b><u>References</u></b>	<b><u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u></b>
<b><u>What it monitors</u></b>	<b><u>SLWP Plan Objective: 5, 6 and 9</u></b> <b><u>SLWP Policy WP5(c)(vi)</u></b> <b><u>SA Objective: 7, 10, 11, 15 and 16</u></b>
<b><u>Monitoring</u></b>	<b><u>Monitor annually against targets using the relevant borough development monitoring procedures; and available data from the Environment Agency data; the London Air Quality Network (<a href="https://www.londonair.org.uk/">https://www.londonair.org.uk/</a>); and annual Air Quality Status Reports published by each local authority and any additional local monitoring networks<sup>4</sup> that may be introduced in the vicinity of industrial locations and/or operational waste sites (typically consisting of NO<sub>2</sub> diffusion tubes).</u></b> <b><u>Report in Waste Authority Monitoring Report and annual Air Quality Status Reports published by each local authority.</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That polluting emissions from the construction and operation of waste sites and associated transport movements do not cause an exceedance of national and regional air quality objectives and are minimised to acceptable levels that do not cause undue harm are not harming to the environment or local communities</u></b>
<b><u>Delivery Partners</u></b>	<b><u>South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u></b>
<b><u>Management Actions</u></b>	<b><u>Contact landowners/developers to identify whether it is an ongoing systemic failure or a one-off, isolated failures, and verify the extent to which the failure is exclusively due to ongoing waste operations on site or the waste operator's vehicles. If the failure is ongoing and systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If a one-off and isolated failure, work with landowners/developers to facilitate waste management output</u></b> <b><u>Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP's policies and safeguarded sites.</u></b>

<sup>4</sup> an example of a local air quality monitoring network is the roll out of low-cost air quality and traffic monitors as part of the South London Partnership funded InnOvaTe (Internet Of Things) project. When completed there will be up to 68 traffic sensors (Vivacity) co-located with 68 air quality monitors ('Breathe London Nodes') which will for the first time link traffic and air quality data together in real-time. The planned network will cover a range of key locations within the Borough with potential air quality issues including in the vicinity of industrial locations and waste sites. LB Merton has recently applied for additional InnOvaTe funding in order to provide additional air quality monitoring along the length of Weir Road.

## **Policy WP6 – Sustainable design and construction of waste facilities**

<b>INDICATOR 6.1: BREEAM AND CEEQUAL RATINGS</b>	<b>The proportion of planning permissions for intensified or compensatory waste facilities achieving a BREEAM and/or CEEQUAL 'Excellent' rating (%)</b>
<b>Indicator 10 (for Policy WP6)</b>	<b>Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating</b>
<b>Target</b>	100% of <b>planning</b> permissions <b>for intensified or compensatory waste facilities achieve a BREEAM and/or CEEQUAL 'Excellent' rating</b>
<b>References What it monitors</b>	<b>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</b> <b>SLWP Plan Objective: 5 and 6</b> <b>SLWP Policy WP6(a)</b> <b>SA Objective: 8</b>
<b>Monitoring</b>	Monitor annually against target <b>using the relevant borough development monitoring procedures</b> <b>Submission of BREEAM and/or CEEQUAL 'design-stage' and 'post-construction' certificates to the relevant local planning authority at the pre-commencement and pre occupation stages respectively</b> <b>Report in Waste Authority Monitoring Report</b>
<b>Outcomes sought</b>	<b>That new waste facilities are built to the highest standards of sustainable design and construction a high sustainability standard and are contributing to reducing the impacts of climate change</b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b>South London Waste Partnership</b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <b>Building Research Establishment</b>
<b>Management Actions</b>	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why <b>waste facilities are not achieving BREEAM and/or CEEQUAL 'Excellent' sites without a fully enclosed covered building have not been permitted.</b> <b>Possibly provide design guidance.</b> <b>Possibly revise South London Waste Plan in light of evidence</b>

<b>INDICATOR 6.2: CARBON EMISSIONS</b>	<b><u>Net carbon dioxide (CO<sub>2</sub>) reductions delivered by waste management facilities compared to Part L of the 2013 Building Regulations (% and tonnes per annum)</u></b>
<b><u>Targets</u></b>	<p><b><u>100% of planning permissions for intensified or compensatory waste developments achieving at least a 35% on-site reduction in CO<sub>2</sub> emissions in accordance with relevant London Plan targets compared to Part L2A of the 2013 Building Regulations;</u></b></p> <p><b><u>100% of permissions for major waste related developments achieve 'zero carbon' standards in line with Policy SI 2 of the London Plan 2021 by offsetting remaining CO<sub>2</sub> emissions through developer contributions to fund carbon reduction measures elsewhere;</u></b></p>
<b><u>References What it monitors</u></b>	<p><b><u>London Plan Policy SI 2</u></b></p> <p><b><u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u></b></p> <p><b><u>SLWP Plan Objective: 5 and 6</u></b></p> <p><b><u>SLWP Policy WP6(b)</u></b></p> <p><b><u>SA Objective: 5</u></b></p>
<b><u>Monitoring</u></b>	<p><b><u>Monitor annually against target using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b></p> <p><b><u>Submission of energy statements, 'as-designed' and 'as-built' simplified building energy model (SBEM) certificates to the relevant local planning authority at the planning application, pre-commencement and pre occupation stages respectively</u></b></p> <p><b><u>Report in Waste Authority Monitoring Report</u></b></p>
<b><u>Outcomes sought</u></b>	<b><u>That new waste facilities delivering reduced CO<sub>2</sub> emissions and are contributing to reducing the impacts of climate change</u></b>
<b><u>Delivery Partners</u></b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b><u>Management Actions</u></b>	<p><b><u>Analyse the boroughs' development management procedures to identify any failure</u></b></p> <p><b><u>Examine whether there are specific reasons why permitted waste developments have not met the relevant targets for reducing CO<sub>2</sub> emissions and carbon offsetting</u></b></p> <p><b><u>Possibly provide design guidance</u></b></p>

<b>INDICATOR 6.3: EMBODIED CARBON</b>	<b>Number and proportion of waste facilities minimising embodied carbon emissions using a nationally recognised Whole Life-Cycle Carbon Assessment (WLC) methodology (%)</b>
<b><u>Targets</u></b>	<b><u>100% of planning permissions for intensified or compensatory waste developments minimise embodied carbon emissions using a nationally recognised WLC methodology</u></b>
<b><u>References What it monitors</u></b>	<b><u>London Plan Policy SI 2</u></b> <b><u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u></b> <b><u>SLWP Plan Objective: 5</u></b> <b><u>SLWP Policy WP6(b)</u></b> <b><u>SA Objectives: 4 and 5</u></b>
<b><u>Monitoring</u></b>	<b><u>Monitor annually against target using the relevant borough development monitoring procedures</u></b> <b><u>Submission of appropriate WLC certification to the relevant local planning authority at both the pre-commencement and pre occupation stages</u></b> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b><u>Outcomes sought</u></b>	<b><u>That new waste facilities minimising embodied carbon emissions and contributing to reducing the impacts of climate change</u></b>
<b><u>Delivery Partners</u></b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b>South London Waste Partnership</b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b><u>Management Actions</u></b>	<b><u>Analyse the boroughs' development management procedures to identify any failure</u></b> <b><u>Examine whether there are specific reasons why permitted waste developments have not achieved WLC certification</u></b>

## **Policy WP7 – The benefits of waste (promoting the circular economy)**

<b>INDICATOR 7.1: CIRCULAR ECONOMY</b>	<p><b><u>7.1.1 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which are supported by a Circular Economy Statement in line with London Plan Policy SI 8 (%)</u></b></p> <p><b><u>7.1.2 Permissions for intensified or compensatory waste facilities which are co-located with complimentary waste or industrial operations/ facilities (%)</u></b></p> <p><b><u>7.1.3 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which achieve 'net zero waste' as defined in the Mayor's Draft Circular Economy Statement Guidance (%)</u></b></p> <p><b><u>7.1.4 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which specify and source materials and other resources sustainably based on the Mayor's Circular Economy Statement Guidance</u></b></p> <p><b><u>7.1.5 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which prioritise refurbishment or 're-purposing' of the existing building on site (as defined in the Mayor's Circular Economy Statement Guidance)</u></b></p> <p><b><u>7.1.6 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which include a completed 'Bill of Materials'<sup>5</sup> as defined in the Mayor's Circular Economy Statement Guidance.</u></b></p> <p><b><u>7.1.7 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which identify opportunities for the use of reused or recycled materials and set individual targets of at least 20% by value of materials</u></b></p> <p><b><u>7.1.8 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which include minimum targets for material intensity (kg/m<sup>2</sup>) - for structure, skin and space layers</u></b></p> <p><b><u>7.1.9 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which include minimum targets for recycled content for structure, skin and space layers as a minimum (% by value)</u></b></p>
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<sup>5</sup> The 'Bill of Materials' must contain estimates of the quantity of materials used in each 'layer' of the building (kg), material 'intensity' (kg/m<sup>2</sup>) and set targets for the minimum amount of recycled content to be used (% by value)



	<p><b><u>7.1.10 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which are supported by a Recycling and Waste Reporting Form<sup>6</sup></u></b></p> <p><b><u>7.1.11 The increase in the proportion of HCI waste and C&amp;D waste re-used and/or recycled on existing waste transfer stations within the plan area</u></b></p> <p><b><u>7.1.12 The proportion of HCI and C&amp;D waste arisings within the SLWP area which are exported out of the plan area prior to reuse or recycling (minimise)</u></b></p> <p><b><u>7.1.13 Monitoring of waste recovery indicators and targets in Mayor's Environment Strategy 2018:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Percentage of HCI waste arisings recycled by 2030;</u></b></li> <li>• <b><u>Percentage of local authority collected waste (LACW) HCI waste arisings recycled by 2030;</u></b></li> <li>• <b><u>Percentage of business waste arisings recycled by 2030</u></b></li> <li>• <b><u>Percentage of excavation waste going to beneficial use</u></b></li> <li>• <b><u>Percentage of C&amp;D waste going to beneficial use</u></b></li> </ul>
<b>Targets</b>	<p><b><u>7.1.1 100% of permissions are supported by a Circular Economy Statement in line with London Plan Policy SI 8 (%)</u></b></p> <p><b><u>7.1.2 Increase in the number of intensified or compensatory waste facilities which are co-located with complimentary waste or industrial operations/ facilities (%)</u></b></p> <p><b><u>7.1.3 100% of permissions achieve 'net zero waste'</u></b></p> <p><b><u>7.1.4 100% of permissions specify and source materials and other resources sustainably</u></b></p> <p><b><u>7.1.5 Where there is an existing building on site, 100% of permissions prioritise refurbishment or 're-purposing' of the existing building on site</u></b></p> <p><b><u>7.1.6 100% of permissions include a completed 'Bill of Materials'</u></b></p> <p><b><u>7.1.7 100% of permissions set individual recycling targets of at least 20% by value of materials</u></b></p> <p><b><u>7.1.8 100% of permissions include minimum targets for material intensity (kg/m<sup>2</sup>) - for structure, skin and space layers</u></b></p> <p><b><u>7.1.9 100% of permissions include minimum targets for recycled content for structure, skin and space layers as a minimum (% by value)</u></b></p>

<sup>6</sup> Waste and Recycling Forms must contain (i) estimates of the total amount of waste/ material generated during excavation, demolition, construction and operation (ii) how much will be reused or recycled onsite, reused or recycled offsite, or sent to landfill (iii) defined activities and targets relating to the relevant London Plan policy targets; and (iv) a commitment to monitor post implementation (% reused/ recycled)

	<p><b><u>7.1.10 100% of permissions are supported by a Recycling and Waste Reporting Form</u></b></p> <p><b><u>7.1.11 A year on year increase in the proportion of HCI waste and C&amp;D waste re-used and/or recycled on existing waste transfer stations</u></b></p> <p><b><u>7.1.12 A year on year reduction in the proportion of HCI and C&amp;D waste arisings which are exported out of the plan area prior to reuse or recycling</u></b></p> <p><b><u>7.1.13 Waste recovery targets:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>65% of HCI waste arisings recycled by 2030;</u></b></li> <li>• <b><u>50% of LACW waste recycled by 2030;</u></b></li> <li>• <b><u>75% of business waste arisings recycled by 2030</u></b></li> <li>• <b><u>95% of excavation waste going to beneficial use</u></b></li> <li>• <b><u>95% of C&amp;D waste going to beneficial use</u></b></li> </ul>
<b><u>References</u></b>	<p><b><u>Plan Objective: 5, 6, 7, 8 and 9</u></b></p> <p><b><u>SLWP Policy WP7</u></b></p> <p><b><u>SA Objective: 4</u></b></p>
<b><u>Monitoring</u></b>	<p><b><u>Monitor annually against target using the relevant borough development monitoring procedures and analysis of approved Circular Economy Statements</u></b></p> <p><b><u>Report in Waste Authority Monitoring Report</u></b></p>
<b><u>Delivery Partners</u></b>	<p><b><u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry,</u></b></p>
<b><u>Management Actions</u></b>	<p><b><u>Analyse the boroughs' development management procedures to identify any failure.</u></b></p>

<b>Indicator 7.1</b>	<b>The proportion of planning permissions for intensified or compensatory waste facilities involving energy from waste (%)</b>
<b>Indicator 11 (for Policy WP7)</b>	<b>Development involving Energy from Waste</b>
<b>Target</b>	0 <del>planning</del> permissions <del>for intensified or compensatory waste facilities involve energy from waste</del>
<b>References</b>	<del>Plan Objective: 6</del> <b><u>SLWP Policy WP7</u></b> <b><u>SA Objective: 5</u></b>
<b>Monitoring</b>	Monitor annually against target <del>using the relevant borough development monitoring procedures</del> <b><u>Report in Waste Authority Monitoring Report</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <del>South London Waste Partnership</del> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry,
<b>Management Actions</b>	Analyse the boroughs' development management procedures to identify any failure.

## SLWP Main Modifications Annex 3 – Changes to Appendix 2

- ~~Strikethrough~~ text indicates a proposed deletion.
- **Bold Underlined** indicates a proposed addition to the text.
- Please note, this completely supersedes previous changes that were put forward as part of SWLP07

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
<b>Croydon Capacity</b>					
C1	Able Waste Services	<b><u>56,699</u></b>	0	<del>43,268</del> <b><u>53,524</u></b>	
C4	Days Aggregates Purley Depot	<b><u>179,300</u></b>	0	<del>178,593</del> <b><u>179,300</u></b>	
C5A	Factory Lane Waste Transfer Station		0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre Site	<b><u>19,736</u></b>	<del>9,623</del> <b><u>10,775</u></b>	<del>5,206</del> <b><u>4,718</u></b>	<b><u>9+</u></b>
C6	Fishers Farm Reuse and Recycling Centre	<b><u>6,895</u></b>	<del>4,542</del> <b><u>4,077</u></b>	<del>0</del> <b><u>1,517</u></b>	
C7	Henry Woods Waste Management	<b><u>13,025</u></b>	0	0	
C8	New Era Metals	<b><u>20,104</u></b>	<del>4,213</del> <b><u>10,358</u></b>	<del>0</del> <b><u>3,327</u></b>	
C9	Peartree Farm	<b><u>59,282</u></b>	0	<del>0</del> <b><u>33</u></b>	
C10	Purley Oaks Reuse and Recycling Centre	<b><u>9,099</u></b>	<del>6,684</del> <b><u>5,658</u></b>	<del>0</del> <b><u>1,911</u></b>	
<del>C11</del>	<del>SafetyKleen</del>	-	<del>0</del> <b><u>39</u></b>	<del>0</del>	Yes
C12	Stubbs Mead Depot	<b><u>13,505</u></b>	<del>0</del> <b><u>13,471</u></b>	0	<b><u>Yes</u></b>
C13	Solo Wood Recycling	<b><u>9,099</u></b>	5,000	0	
CEX	Exempt Sites	-	2,580	0	
	<b>Croydon Total</b>	<b><u>386,744</u></b>	<del>32,883</del> <b><u>51,919</u></b>	<del>227,067</del> <b><u>244,330</u></b>	
<b>Kingston Capacity</b>					
K2	Genuine Solutions Group	<b><u>342</u></b>	<del>1,630</del> <b><u>277</u></b>	0	
K3	Kingston Reuse and Recycling Centre	<b><u>13,443</u></b>	<del>9,392</del> <b><u>7,631</u></b>	<del>0</del> <b><u>2,823</u></b>	
K4	Kingston Waste Transfer Station	<b><u>68,297</u></b>	<del>19,620</del> <b><u>40,254</u></b>	0	<b><u>Yes</u></b>
<b>K5</b>	<b><u>Chessington Railhead</u></b>	-	<b><u>0</u></b>	<b><u>0</u></b>	<b><u>Yes</u></b>

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
KEX	Exempt Sites	-	5,000	0	
	<b>Kingston Total</b>	<b><u>82,082</u></b>	<del>35,642</del> <b><u>53,162</u></b>	<del>0</del> <b><u>2,823</u></b>	
<b>Merton Capacity</b>					
M1	B&T@Work	<b><u>3,729</u></b>	0	0	
M2	European Metal Recycling	<b><u>65,050</u></b>	<del>70,100</del> <b><u>46,242</u></b>	<del>0</del> <b><u>1,301</u></b>	
M3	Deadman Confidential	<b><u>5,000</u></b>	<del>9,866</del> 5,000	0	Yes
M4	Garth Road Reuse and Recycling Centre	<b><u>14,594</u></b>	<del>15,704</del> <b><u>8,433</u></b>	<del>0</del> <b><u>3,065</u></b>	
M5	Garth Road Transfer Station	<b><u>22,642</u></b>	<del>0</del> <del>15,704</del> <b><u>20,028</u></b>	<del>0</del> <b><u>453</u></b>	
M6	George Killoughery	<b><u>35,840</u></b>	0	<del>0</del> <b><u>717</u></b>	
M7	LMD Waste Management (Abbey Industrial Estate)	<b><u>38,459</u></b>	0	<del>20,774</del> <b><u>38,459</u></b>	
M8	LMD Waste Management (Wandle Way)	<b><u>56,920</u></b>	0	<del>33,845</del> <b><u>56,920</u></b>	
M9	Maguire Skips	<b><u>67,719</u></b>	0	0	<b><u>Yes</u></b>
M10	Powerday	<b><u>53,313</u></b>	0	<del>42,856</del> <b><u>24,981</u></b>	
M11	Morden Transfer Station	<b><u>43,564</u></b>	<del>0</del> <b><u>746</u></b>	<del>0</del> <b><u>5,534</u></b>	
M12	NJB Recycling	<b><u>48,687</u></b>	0	<del>18,030</del> <b><u>45,058</u></b>	
M13	One Waste Clearance	<b><u>55,665</u></b>	<del>13,453</del> 0	<del>4,547</del> <b><u>54,887</u></b>	
M14	Reston Waste Transfer and Recovery	<b><u>71,595</u></b>	0	<del>30,131</del> <b><u>46,007</u></b>	
M15	Riverside AD Facility	<b><u>60,585</u></b>	<del>46,341</del> <b><u>60,585</u></b>	0	
M16	Riverside Bio Waste Treatment Centre	<b><u>58,191</u></b>	<del>51,715</del> <b><u>58,191</u></b>	0	
M17	UK and European (Ranns) Construction	<b><u>804</u></b>	0	0	<b><u>Yes</u></b>
M18	Wandle Waste Management	<b><u>677</u></b>	<del>0</del> <b><u>30</u></b>	0	
MEX	Exempt Sites	-	1,000	0	
	<b>Merton Total</b>	<b><u>703,034</u></b>	<del>213,179</del> <b><u>200,255</u></b>	<del>150,183</del> <b><u>277,382</u></b>	
<b>Sutton Capacity</b>					



Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
S1	777 Recycling	-	20,625 <del>2,044</del>	32,972 <del>9,991</del>	
S2	Beddington Farmlands Energy Recovery Facility	<b>279,696</b>	275,000	0	
S3	Cannon Hygiene	<b>9,601</b>	0 <b>635</b>	0	<b>Yes</b>
S4	Croydon Transfer Station	<b>32,448</b>	21,113 <b>30,826</b>	0 <b>811</b>	Yes
S5	Hinton Skips	<b>35,639</b>	5,381 <b>3,564</b>	1,819 <b>32,075</b>	Yes
S6	Hydro Cleansing	<b>18,244</b>	0 <b>9,567</b>	0 <b>1,204</b>	
S7	Kimpton Reuse and Recycling Centre	<b>14,799</b>	8,640 <b>8,068</b>	0 <b>3,108</b>	
S8	King Concrete	<b>1,200</b>	0	0 <b>400</b>	Yes
S9	Premier Skip Hire	<b>4,036</b>	8,072 <b>222</b>	2,728 <b>898</b>	
S10*	Raven Recycling	<b>19,874</b>	5,310 <b>7,222</b>	5,506 <b>5,161</b>	
S11	TGM Environmental	-	15,000	0	
S12	Beddington Resource Recovery Facility	<b>305,000</b>	305,000	0	
S13	Exempt Sites		500	0	
	<b>Sutton Total</b>	<del>749,044</del> <b>720,537</b>	664,641 <del>642,647</del> <b>640,604</b>	43,025 <del>53,648</del> <b>43,657</b>	
<b>South London Capacity</b>					
	Croydon	<b>386,744</b>	32,883 <b>51,919</b>	227,067 <b>244,330</b>	
	Kingston	<b>82,082</b>	35,642 <b>53,162</b>	0 <b>2,823</b>	
	Merton	<b>703,034</b>	213,179 <b>200,225</b>	150,183 <b>277,382</b>	
	Sutton	<b>720,537</b>	664,641 <b>640,604</b>	43,025 <b>43,657</b>	
	<b>South London Total</b>	<b>1,892,397</b>	946,345 <b>945,910</b>	420,275 <b>568,192</b>	
<b>South London Capacity Against Target</b>					
	South London Capacity	-	946,345 <b>945,910</b>	420,275 <b>568,192</b>	
	South London Target	-	929,750 <b>932,800</b>	414,380 <b>415,019</b>	
	<b>South London Capacity against Target</b>	-	+16,565 <b>+13,110</b>	+5,895 <b>+153,173</b>	

**All safeguarded sites are listed in the table, including those that at the time of publication did not contribute towards the Apportionment and C&D Target. However, these sites have potential to contribute to waste targets in future years if the amount of waste managed onsite increases e.g. through intensification.**

**SLWP Main Modifications Annex 2 – Clean Version**

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
<b>Croydon Capacity</b>					
C1	Able Waste Services	56,699	0	53,524	
C4	Days Aggregates Purley Depot	179,300	0	179,300	
C5A	Factory Lane Waste Transfer Station	19,736	0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre Site		10,775	4,718	Yes
C6	Fishers Farm Reuse and Recycling Centre	6,895	4,077	1,517	
C7	Henry Woods Waste Management	13,025	0	0	
C8	New Era Metals	20,104	10,358	3,327	
C9	Peartree Farm	59,282	0	33	
C10	Purley Oaks Reuse and Recycling Centre	9,099	5,658	1,911	
C12	Stubbs Mead Depot	13,505	13,471	0	Yes
C13	Solo Wood Recycling	9,099	5,000	0	
CEX	Exempt Sites	-	2,580	0	
	<b>Croydon Total</b>	<b>386,744</b>	<b>51,919</b>	<b>244,330</b>	
<b>Kingston Capacity</b>					
K2	Genuine Solutions Group	342	277	0	
K3	Kingston Reuse and Recycling Centre	13,443	7,631	2,823	
K4	Kingston Waste Transfer Station	68,297	40,254	0	Yes
<b>K5</b>	<b>Chessington Railhead</b>	-	0	0	Yes
KEX	Exempt Sites	-	5,000	0	
	<b>Kingston Total</b>	<b>82,082</b>	<b>53,162</b>	<b>2,823</b>	
<b>Merton Capacity</b>					
M1	B&T@Work	3,729	0	0	

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
M2	European Metal Recycling	65,050	46,242	1,301	
M3	Deadman Confidential	5,000	5,000	0	Yes
M4	Garth Road Reuse and Recycling Centre	14,594	8,433	3,065	
M5	Garth Road Transfer Station	22,642	20,028	453	
M6	George Killoughery	35,840	0	717	
M7	LMD Waste Management (Abbey Industrial Estate)	38,459	0	38,459	
M8	LMD Waste Management (Wandle Way)	56,920	0	56,920	
M9	Maguire Skips	67,719	0	0	Yes
M10	Powerday	53,313	0	24,981	
M11	Morden Transfer Station	43,564	746	5,534	
M12	NJB Recycling	48,687	0	45,058	
M13	One Waste Clearance	55,665	0	54,887	
M14	Reston Waste Transfer and Recovery	71,595	0	46,007	
M15	Riverside AD Facility	60,585	60,585	0	
M16	Riverside Bio Waste Treatment Centre	58,191	58,191	0	
M17	UK and European (Ranns) Construction	804	0	0	Yes
M18	Wandle Waste Management	677	0	0	
MEX	Exempt Sites	-	1,000	0	
	<b>Merton Total</b>	<b>703,034</b>	<b>200,255</b>	<b>277,382</b>	
<b>Sutton Capacity</b>					
S2	Beddington Farmlands Energy Recovery Facility	279,696	275,000	0	
S3	Cannon Hygiene	9,601	635	0	Yes
S4	Croydon Transfer Station	32,448	30,826	811	Yes
S5	Hinton Skips	35,639	3,564	32,075	Yes
S6	Hydro Cleansing	18,244	9,567	1,204	

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
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S7	Kimpton Reuse and Recycling Centre	14,799	8,068	3,108	
S8	King Concrete	1,200	0	400	Yes
S9	Premier Skip Hire	4,036	222	898	
S10	Raven Recycling	19,874	7,222	5,161	
S12	Beddington Resource Recovery Facility	305,000	305,000	0	
S13	Exempt Sites		500	0	
	<b>Sutton Total</b>	<b>720,537</b>	<b>640,404</b>	<b>43,657</b>	
<b>South London Capacity</b>					
	Croydon	386,744	51,919	244,330	
	Kingston	82,082	53,162	2,823	
	Merton	703,034	200,225	277,382	
	Sutton	720,537	640,604	43,657	
	<b>South London Total</b>	<b>1,892,397</b>	<b>945,910</b>	<b>568,192</b>	
<b>South London Capacity against Target</b>					
	South London Capacity	-	945,910	568,192	
	South London Target	-	932,800	415,019	
	<b>South London Capacity against Target</b>	<b>-</b>	<b>+13,110</b>	<b>+153,173</b>	

**All safeguarded sites are listed in the table, including those that at the time of publication did not contribute towards the Apportionment and C&D Target. However, these sites have potential to contribute to waste targets in future years if the amount of waste managed onsite increases e.g. through intensification.**

<b>REPORT TO:</b>	<b>Cabinet 16<sup>th</sup> November 2022 Council 14<sup>th</sup> December 2022</b>
<b>SUBJECT:</b>	<b>South London Waste Plan Development Plan Document - Adoption</b>
<b>LEAD OFFICER:</b>	<b>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration &amp; Economic Recovery Heather Cheesbrough, Director of Planning &amp; Sustainable Regeneration</b>
<b>CABINET MEMBER:</b>	<b>Cllr Jeet Bains, Cabinet Member for Planning &amp; Regeneration</b>
<b>WARDS:</b>	<b>All</b>

**SUMMARY OF REPORT:**

In order to have an up-to-date planning framework to make decisions on proposals on sites which process waste, in addition to the Local Plan there is a separate Waste Plan. This report represents the final stage in the progression of the preparation of the joint South London Waste Plan Development Plan Document to adoption. It will then form part of the Council's Planning Policy Framework to spatially manage waste and be used to determine related planning applications.

The South London Waste Plan (SLW Plan) has been funded from a successful bid to the Department for Levelling Up, Housing & Communities, Planning Delivery Fund.

This is the final stage of the joint production of the South London Waste Plan following two stages of consultation in October- December 2019 (Regulation 18 Issues and Options) and September – October 2020 (Regulation 19 Submission) and the Examination in Public in September 2021.

**FINANCIAL IMPACT:**

In 2018, the four boroughs (Merton, Kingston, Sutton and Croydon) successfully bid for government funding for £136,594 for joint working to produce a new South London Waste Plan Development Plan Document. Not all this funding has been spent and the South London Waste Plan continues to be funded from this grant award. The adoption of the South London Waste Plan Development Plan Document can be funded by the remaining funds from this grant.

**KEY DECISION REFERENCE NO.: 6022EM**



**RECOMMENDATIONS:**

The Executive Mayor in Cabinet is recommended to;

- i. Note this report on the progress made to date towards the development of a National Planning Policy Framework compliant development plan document, the South London Waste Plan 2022 to 2037 (Appendix 1) and that as a result a favourable Inspector's Report is expected shortly finding the SLW Plan to be sound.
- ii. The Cabinet is to further note that the final Inspectors Report is delayed and still awaited.
- iii. Recommend Council to adopt the South London Waste Plan 2022 to 2037, subject to the recommendations in the Inspector's Report as a Development Plan Document in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012.

**1. EXECUTIVE SUMMARY**

- 1.1. The purpose of this report is to report on the progression of the development of a National Planning Policy Framework compliant Development Plan Document, the South London Waste Plan. This is a joint plan undertaken by the four boroughs of Merton, Kingston, Sutton and Croydon that allocates sites, has specific planning policies and designated areas suitable for waste management development. This report is anticipating approval to adopt the revised South London Waste Plan 2022-2037 (SLW Plan) following the receipt of a report from the Secretary of State's appointed panel of Inspectors' who undertook the examination of the plan finding it sound subject to modifications being made. *The final Inspector's Report will be available at the full Council meeting but it is still awaiting Ministerial sign off.*
- 1.2 The existing SLW Plan will finish in 2022 so this revision is needed. The revised SLW Plan sets out how the projected amounts of waste to be generated within the four boroughs and the amount of waste apportioned to the boroughs in the adopted London Plan 2021 will be managed. The SLW Plan is not about waste collection and disposal services or the waste contracts. It is a statutory requirement as outlined in the National Planning Policy Framework 2021 to have an up-to-date waste plan for the borough.
- 1.3 A report from the Planning Inspectors' about the SLW Plan 2022 is anticipated and this should be available before it is adopted by all the Councils. It can then be brought into use to determine planning applications as a Development Plan Document (DPD) that forms part of the Council's Local Development Framework. It should be noted that during the SLW Plan Examination in Public the government adopted a new National Planning Policy Framework (NPPF), which now requires that a Development Plan Document (such as the SLW Plan) has a lifespan of 15 years from adoption. The SLW Plan is supported by evidence that

gives it a lifespan of 2022 to 2037, which means it has to be adopted this year to meet the NPPF requirement. The SLW Plan needs to be reported to Council in December 2022 for formal adoption.

## 2. PREPARATION OF THE SOUTH LONDON WASTE PLAN 2022-2037

2.2 In 2012, the London boroughs of Croydon, Sutton, Kingston and Merton, working jointly produced and adopted the South London Waste Plan (Development Plan Document) 2012-2022. This had the aim of providing policies for making decisions on planning applications for waste use and safeguarding a range of existing waste sites for waste management purposes with designated sites appearing on the boroughs' Planning Policies Maps. The plan also safeguarded existing waste sites and identified areas which may be suitable for waste use. The South London Waste Plan 2022-2037 now updates (although through an almost entirely re-written document) the 2012 waste plan that seeks to provide continuous policy coverage to determine waste planning applications.

2.3 The draft SLW Plan for 2022-2037 was consulted upon twice between October and December 2019 (regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 generally known as 'Issues and Options') and between September and October 2020 (regulation 19 generally known as 'Submission'). It was submitted to the Planning Inspectorate in January 2021 and an Examination in Public (EiP) was held in front of the Secretary of State's appointed panel of two Inspectors' in September 2021 with subsequent correspondence since then to identify the Main Modifications required to make the plan sound, including;

- Written response to the Inspectors' [preliminary matters and initial questions](#) in March 2021 on targets, the new London Plan and queries about sites,
- Written responses to the Inspectors' detailed "[Matters, Issues and Questions](#)" in July 2021 that formed to subject areas for the Examination in Public,
- Evidence and arguments presented in person to the Inspectors' over two days of hearings in September 2021. This gives the Inspectors' the opportunity to ask further detailed questions regarding the written responses and an opportunity for us to respond to the hearing statements submitted by the other participants.

2.3. The Inspectors' role is to determine whether the draft SLW Plan is: (a) legally compliant; and (b) sound. After considering all the evidence and arguments that had been presented, at the end of the hearing sessions the Inspectors' provided a summary of 'where we are' and gave an indication of the next steps that the Councils need to take. As with all EiPs, the Inspectors' required some modifications to the Plan in order for them to be able to conclude that the SLW Plan was sound. The majority of these changes were not fundamental and were so minor and thus did not result in additional clarity/improvements to the Plan.

- 2.4. A further round of consultation was undertaken on [the main modifications and associated evidence](#), the “Main Modifications” between 14 July and 2 September 2022 as this consultation was undertaken after the submission of the SLW Plan the consultation responses were sent to the Inspectors’ to take into account when writing their report. The final Examination report once received is expected to state that they were satisfied that the Main Modifications addressed the issues raised during the course of the Examination and that the SLW Plan has been found sound.

### **3. Risks**

- 3.1. There is now requirement to make timely progress with the next step towards adoption of the SLW Plan. During the SLW Plan EiP the government adopted a new National Planning Policy Framework (NPPF), which now requires that a Development Plan Document has a lifespan of 15 years *from adoption*. The SLW Plan has a lifespan of 2022 to 2037, which means it has to be adopted by all four authorities in 2022 to meet the NPPF requirement. If adoption is delayed to 2023 the boroughs would need to produce new additional supporting evidence and changes to the SLW Plan such as to analyse the latest Environment Agency waste data, recalculate all the waste figures in the SLW Plan, and make any other consequential alterations, resubmit this to the Inspectors’ and undertake an additional round of consultation which will be time consuming and costly. To avoid this, the boroughs need to all accept the recommendations in the Inspector’s’ Report, when received and allow the final SLW Plan to be adopted by all the partner Councils by the end of December 2022.

### **4. CONSULTATION**

- 4.1 There have been two rounds of consultation undertaken as required by the regulations<sup>18</sup> and 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. These rounds of consultation were used to develop the policies in the SLW Plan before it was submitted for Examination. A further Main Modifications consultation on the instruction of the Inspectors’ took place this summer to address issues raised during the Examination. The Inspectors’ will have taken into account the responses to the Main Modifications in their report and make a recommendation on soundness. As required by the Regulations a full report of the consultations undertaken was part of the bundle submitted with the SLW Plan.

### **5. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 5.1 Waste planning is something that lends itself to joint working as it uses an apportioned approach across borough boundaries with the amounts that need to be met as set out in targets in the London Plan March 2021. A joint waste plan enables the four boroughs to plan for this waste apportionment with a strategic approach. It is a statutory requirement and as outlined in the National Planning Policy Framework to have an up-to-date waste plan for the borough.

## 6. OPTIONS CONSIDERED AND REJECTED

- 6.1 **Adopt SLWP** – this will provide the boroughs with an up-to-date Development Plan based on local evidence and local knowledge to use to spatially manage waste and determine planning applications.
- 6.2 **Do not adopt the SLW Plan** – the adopted South London Waste Plan 2012 expires at the end of 2022 so should the new plan not be adopted there would not be a Development Plan in 2023. The fall -back position would be to use the guidance in the National Planning Policy Framework to determine planning applications. The NPPF being the national guidance is a one size fits all approach so local issues may not be able to be adequately addressed.

## 7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

### 1 Revenue and Capital consequences of report recommendations

- 7.1 In 2018, the four boroughs successfully bid for £136,594 from the government Planning Delivery Fund for joint working to produce a new SLW Plan. Not all of this funding has been spent and finalising the South London Waste Plan towards adoption will continue to be funded from this grant award. The London Borough of Sutton manage the project budget, with support from the existing resource of the Croydon Plan Making Team – Spatial Planning, Growth Zone and Regeneration, and this stage of the Plan’s production and adoption does not create any budget pressure for Croydon Council. There are sufficient budget monies available to complete the project as the large expense of the examination which has been held is now known and has been paid for.

	Current Year	Medium Term Financial Strategy – 3-year forecast		
	2022/23 £'000	2023/24 £'000	2024/25 £'000	2025/26
<b>Revenue Budget Available</b>				
Expenditure Income				
<b>Effect of decision from report</b>				
Expenditure Income				
<b>Remaining Budget</b>				

<b>Capital Budget available</b>	£35,725 (of a budget since 2019 £136,594)			
Expenditure	£35,725			
<b>Effect of decision from report</b>				
Expenditure Income				
<b>Remaining Budget</b>	£0	£0		

## 2 The effect of the decision

7.2 This is a joint plan undertaken by the four boroughs of Merton, Kingston, Sutton and Croydon as a statutory function, that updates the adopted South London Waste Plan 2012-22 which allocated sites, created planning policies and designated areas suitable for waste management development. The existing South London Waste Plan will expire in 2022. The South London Waste Plan 2022 – 2037 sets out how the projected amounts of waste to be generated within the four boroughs and the amount of waste apportioned to the boroughs in the London Plan 2021 will be managed. These are planning policy matters and not connected to waste collection or the waste collection contract.

## 3 Risks

7.3 There is now necessary to undertake the final step towards adoption of the SLW Plan as the new National Planning Policy Framework (NPPF) 2021, now requires that a DPD has a lifespan of 15 years from adoption. The draft Plan has a lifespan of 2022 to 2037, which means it has to be adopted in 2022 to meet the NPPF requirement. Should the SLW Plan not be adopted the implications and consequences as set out in paragraph 6.2 above will be engaged. This additional work would require extensive additional budget monies beyond the existing project budget.

## 4 Options

- **Abandon the Waste Plan** - This would leave all the Councils with no planning scope to refuse inappropriate waste treatment planning applications or negotiate amendments to inappropriate waste treatment planning applications and pre-applications



- **Accept all the Inspector's Report findings and adopt** - This gives the Councils the necessary statutory planning scope to approve appropriate waste treatment planning applications and refuse those that are inappropriate.

## **5 Future savings/efficiencies**

- 7.4 The project is being fully funded by a government grant and supported by the existing resource in Spatial Planning, Plan Making Team and can be delivered with the current establishment staff level. Post adoption the SLW Plan will provide a planning framework to determine waste proposals, so should reduce the likelihood and costs associated with planning appeals.

Approved by: Darrel Jones, Interim Head of Finance for Sustainable Communities Dated 30.9.22. (checked by Kay Oshin)

## **8. Pre-Decision Scrutiny**

- 1.1. This report on the South London Waste Plan, will be presented to Scrutiny on 8<sup>th</sup> November 2022, before it is put forward for decision by the Cabinet and Council.

## **9. LEGAL CONSIDERATIONS**

- 9.1 As waste planning authorities, all four of the boroughs have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008) (as amended).
- 9.2 The Housing and Planning Act 2016, gives the Secretary of State greater powers to intervene in the Local Development Plan making process. Specifically, it would allow the Secretary of State to intervene if a local authority was failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a Local Development Plan.
- 9.3 The SLW Plan has been produced according to the Planning and Compulsory Purchase Act (2004, as amended) and the Town and Country Planning (Local Planning) (England) Regulations as set out in the report.

Approved by: Samra Yunus Corporate Solicitor on behalf of Stephen Lawrence – Orumwense, the Director of Legal Services and Monitoring Officer Date approved: on 3<sup>rd</sup> November 2022

## **10. HUMAN RESOURCES IMPACT**

- 10.1 There are no Human Resource impacts as the production and adoption of the South London Waste Plan is set out in the Spatial Plan Service Plan and can be delivered with the current establishment staff level. If any issues arise these will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Housing Directorate & Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoemith, Chief People Officer. Date approved: 24 October 2022

## **11. EQUALITIES IMPACT**

- 11.1 The Sustainability Appraisal, accompanying the Draft South London Waste Plan, includes a comprehensive Equalities Impact Assessment covering all four boroughs involved see background documents.
- 11.2 The Equality Analysis concluded that the proposed policies are expected to have a positive impact on groups that share a protected characteristic, by increasing employment and healthier environment. Further details can be found in on pages 27-28 of Appendix 3 (Equality Impact Assessment)

Approved by: Denise McCausland – Equality Programme Manager Dated 27 September 2022.

## **12. ENVIRONMENTAL IMPACT**

- 12.1 A full Sustainability Appraisal (incorporating a Strategic Environmental Assessment) of the draft South London Waste Plan has been prepared and the findings incorporated into the Proposed Submission report. This can be found in Appendix 3 of this report. Under regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004, the Sustainability Appraisal must also be consulted upon alongside the draft South London Waste Plan.

## **13. CRIME AND DISORDER REDUCTION IMPACT**

- 13.1 There are no crime and disorder reduction impacts arising from the recommendations of this report.

## **14. DATA PROTECTION IMPLICATIONS**

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**NO**

**CONTACT OFFICER:** Steve Dennington, Head of Spatial Planning & Interim Head of Growth Zone and Regeneration

**APPENDICES TO THIS REPORT:**

Appendix 1: [Draft South London Waste Plan \(Proposed Submission\)](#)

**BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972**

<https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/croydons-development-plan/south-london-waste-plan>

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<b>REPORT TO:</b>	<b>COUNCIL</b> <b>14 DECEMBER 2022</b>
<b>SUBJECT:</b>	<b>QUARTERLY REPORT ON THE USE OF SPECIAL URGENCY FOR KEY DECISIONS OCTOBER TO DECEMBER 2022</b>
<b>LEAD OFFICER:</b>	<b>Stephen Lawrence-Orumwense</b> <b>Director of Legal and Monitoring Officer</b>
<b>WARDS:</b>	<b>ALL</b>

<b>1.</b>	<b>RECOMMENDATIONS</b>
1.1.	To note the use of Special Urgency for the key decision listed at section 3.4 of this report during the period October to December 2022.

## **2. EXECUTIVE SUMMARY**

- 2.1. In accordance with the Access to Information Procedure Rules (Part 4B of the Constitution), the Executive Mayor is required to submit a report to Council on the use of Special Urgency for key decisions.
- 2.2. This report details the single case where Special Urgency has been used between October and December 2022.

## **3. BACKGROUND**

- 3.1. The proposed making of a key decision requires the giving of 28 days' prior public notice. Where the giving of such notice is impracticable the Constitution provides both General Exception and Special Urgency provisions. The General Exception provisions require, amongst other things, a period of five clear working days' notice to be given. Where compliance with the General Exception principle is impractical the decision can be taken under the Special Urgency provisions. In cases of Special Urgency the decision may only be made where the decision maker has obtained agreement that the making of the decision is urgent and cannot reasonably be deferred from:
  - a. The Chair of the Scrutiny & Overview Committee; or
  - b. If there is not such person, or if the Chair of the Scrutiny & Overview Committee is unable to act, the Chair of the Council; or



- c. Where there is no Chair of the Scrutiny & Overview Committee or Chair of the Council, the Deputy Chair of the Council.
- 3.2. There has been one case of the use of Special Urgency procedures during this period which the Chair of Scrutiny & Overview Committee approved after consideration.
- 3.3. Following the approval of the Chair of Scrutiny & Overview Committee two notices were published and circulated to all Members of the Council:
- A notice that a decision would be made under Special Urgency which included the reason for urgency; and
  - A further notice stating the decision had been made and included the report upon which the decision was based.
- 3.4. During this period the provision of Special Urgency has been used for the following:

Decision Title	Decision number	Decision maker	Reason for Special Urgency	Date SU notice published	Date decision notice published
<a href="#">Family Hub and Start for Life Programme</a>	7122EM	Executive Mayor	The Family Hub and Start for Life Grant had been highlighted in various Cabinet reports and the department were not aware that the sign up for the Grant would be a key decision. For this reason, it was omitted from the forward plan.	31 October 2022	31 October 2022

- 3.5. The Special Urgency procedure was used to reduce costs or the loss of savings to the council.
- 3.6. More detail on each decision is available by clicking on the links in the table above or by visiting the website at: [Decisions](#)
- 3.7. Members will note that Council agreed at its meeting on 23 March 2022 to amend the Access to Information Procedure Rules set out in Part 4B of the Constitution. One of the agreed amendments, set out in rule 34.1 of Part 4B was to increase the frequency of any future reports to Council by the Executive Mayor on the use of Special Urgency from annually to quarterly. Reports are now presented to full Council on a quarterly basis by the Executive Mayor containing details of each executive decision taken during the period since the

last report was submitted to Council where the making of the decision was agreed as urgent in accordance with Special Urgency requirements set out in rule 32.

#### **4. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 4.1 There are no direct financial consequences of this report. Each decision taken under the special urgency framework was supported by a report that set out the financial implications of that decision and was subject to financial review as part of the decision making process.

*Approved by:* Lesley Shields Head of Finance – Assistant Chief Executive and Resources

#### **5. LEGAL CONSIDERATIONS**

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services and Monitoring Officer that the statutory definition of a 'key decision' is set out in regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 as a decision which is likely:

- a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates; or
- b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the local authority.

- 5.2 Guidance issued under the Local Government Act 2000 section 38 provides that the council shall agree as a full council limits above which items are 'significant' and publish those limits which the council has done via its Constitution.

- 5.3 The Constitution defines a "key decision" as defined in Article 13.2(d) namely an executive decision, which is likely to—
- a) result in the Council incurring expenditure, or making savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council's budget for the service or function to which the decision relates; or
  - b) be significant in terms of its effects on communities living or working in an area comprising two or more Wards in the Borough.

- 5.4 The Access to Information Procedure Rules in Part 4B of the Constitution paragraphs 31 and 32 set out specific requirements including publicity in

relation to the taking of 'key decisions' and in particular exceptions to the usual publicity requirements on the grounds of General Exception and cases of Special Urgency. Paragraph 34 makes specific provision for a quarterly report on the use of the Special Urgency provisions by the Executive Mayor to be made to full council.

*Approved by:* Sandra Herbert Head of Litigation and Corporate Law for and on behalf of the Director of Legal Services and Monitoring Officer.

## **6. HUMAN RESOURCES IMPACT**

- 6.1 There are no direct workforce implications arising from this report. Should any workforce implications arise, these will be dealt with in accordance with the Council's HR policies and procedures.

*Approved by:* Gillian Bevan, Head of HR, Resources and Assistant Chief Executives on behalf of the Chief People Officer.

## **7. EQUALITIES IMPACT**

- 7.1 There are no direct equalities implications from this report. Each decision taken under special urgency provision was supported by a report that set out the equalities impact of that decision and was subject to an equality analysis as part of the decision-making process. This is in line with the Equality Strategy 2020-2024 which states that all key decisions should be supported by an equality impact assessment and that equality impact assessments must be data driven.

*Approved by:* Denise McCausland – Equalities Programme Manager

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**CONTACT OFFICER:** Simon Trevaskis  
Senior Democratic Services and Governance Officer  
– Scrutiny

**BACKGROUND DOCUMENTS:** None