

# South London Waste Plan

## Proposed Submission



**January 2011**



## Publication Arrangements

This document is Croydon, Kingston, Merton and Sutton Councils' Joint Waste Development Plan Document (known as the South London Waste Plan) which is proposed for submission to the Secretary of State. Following this, the Secretary of State will appoint an independent Planning Inspector to thoroughly examine the Waste Plan. This process, known as the *examination in public*, will take place in 2011.

This document provides a spatial strategy for the sustainable management of waste from households, businesses and industry and looks forward over a 10-year period. It also includes development management policies to guide decisions on planning applications for waste facilities. It takes account of the latest guidance and local evidence and what people and organisations have told us through public consultations.

The period for making comments on this South London Waste Plan Proposed Submission document is six weeks from **Monday 3 January 2011 to Monday 14 February 2011**. Any comments must be received by midnight on Monday 14<sup>th</sup> February 2011. Please note that we are unable to extend this consultation period. Please also note that any representations received will be forwarded to the Planning Inspector, together with the boroughs' response to the representation, for consideration at the examination. Representations cannot therefore be treated as confidential.

At this final publication stage of government guidance is that only matters of 'soundness' should be raised by respondents. At this stage the Council has limited scope to change the document prior to the examination in public. This stage is not an opportunity to revise the strategy or policies. More advice on what constitutes 'soundness' is provided in the standard response form which appears at the end of this document.

**We encourage responses to be made electronically.** Representations should be made using the online standard response form found on the online at: <http://southlondonwasteplan.limehouse.co.uk>. Alternatively, send an email to: [southlondonwasteplan@rbk.kingston.gov.uk](mailto:southlondonwasteplan@rbk.kingston.gov.uk).

However, if you do not have Internet access, representations can be made using the standard response form and faxed to 020 8547 5363 or posted to: The Project Manager, South London Waste Plan, The Royal Borough of Kingston Upon Thames, High Street, Kingston Upon Thames, KT1 1EU.

If you wish to discuss any issues raised in this document or any of the arrangements to enable representations, please contact the Project Manager on 020 8547 5375.

In dealing with responses, we will:

- Acknowledge all responses made;
- Summarise all responses;
- Prepare a report to Councillors on all responses and set out the Council's views on these, including recommendations on the way forward. This report will be made publicly available on the website <http://southlondonwasteplan.limehouse.co.uk> and in local libraries;
- Contact respondents to tell you when and where the report on the outcome of this Publication stage is available.

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**The Standard Response Form which can be used to make recommendations appears at the rear of this document**



## Section 1: Introduction

1.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton have worked jointly to prepare this Proposed Submission version of the Joint Waste Development Plan Document, known as the South London Waste Plan.

1.2 This document is presented in the following sections:

**Section 1:** Introduction  
**Section 2:** The need to plan for waste  
**Section 3:** Plan area context and key issues  
**Section 4:** Policies and how these will be monitored  
**Section 5:** Site Descriptions  
*Schedule 1:* Existing waste management facilities  
*Schedule 2:* Industrial Areas  
*Schedule 3:* Information which may be required for a planning application  
*Appendix 1:* Full list of evidence base studies

1.3 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 10 years. The Waste Plan contains policies (*see Section 4*) to promote the adequate provision of modern, high quality, clean and well-run waste management facilities (including for disposal) on the most suitable sites in the partner boroughs.

1.4 It ensures that more waste is re-used, recycled or turned into useful compost or energy, and less waste is sent

to landfill. It ensures that positive benefits are realised; in particular the production of heat and power for local use. Importantly, the policies within the Waste Plan ensure that development does not negatively impact communities' quality of life.



### Background

1.5 National guidance permits collaborative working to tackle the issue of sustainable waste management and in autumn 2007, the partner boroughs' decision-making bodies endorsed the proposal to prepare a joint Waste Development Plan Document, known as the South London Waste Plan. The boroughs already had a track record of successful partnership working, having previously secured joint funding for a number of recycling and composting projects. More recently, the four boroughs have formed the South London Waste Partnership to jointly procure waste treatment and disposal contracts for municipal waste<sup>1</sup>.

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<sup>1</sup> Municipal waste is that which arises from households but also includes waste collected by local authorities as a result of other activities including street sweeping and municipal park maintenance.

**Figure 1.1: Map showing the South London Waste Plan area**



**The Local Development Framework**

1.6 The South London Waste Plan will form part of each borough’s Local Development Framework (LDF) as set out in each borough’s Local Development Scheme. Once the partner boroughs have formally adopted the Waste Plan, (anticipated at the end of 2011), it will form part of the legal development plan for all four boroughs.

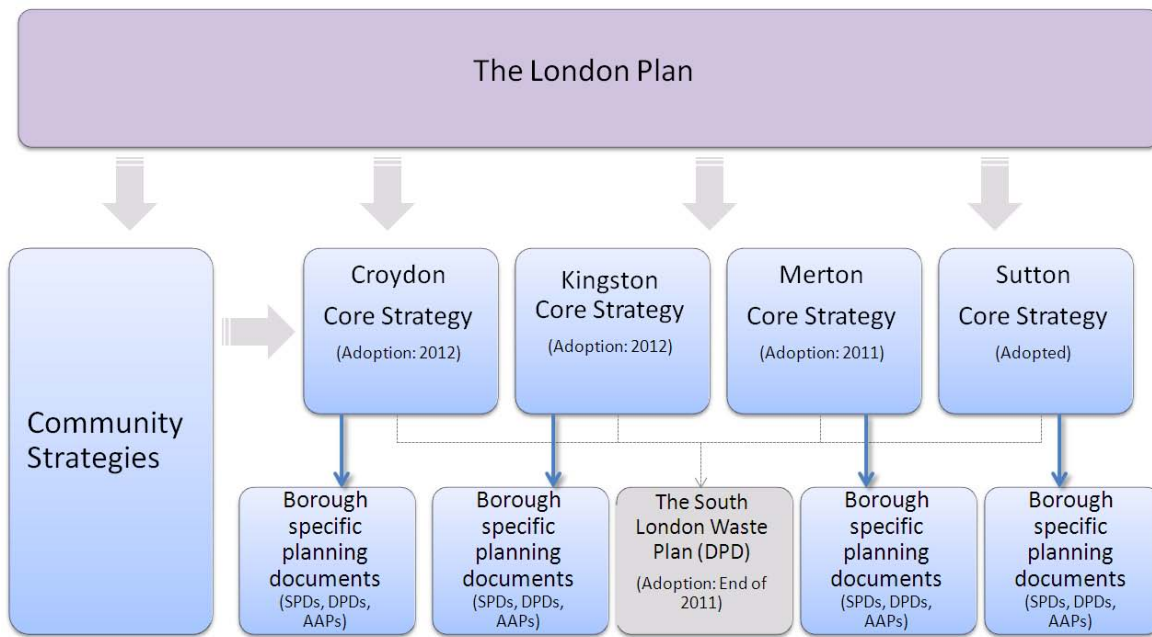
1.7 A borough’s LDF comprises a number of documents which together outline how development and change will be managed in an area.

1.8 The Core Strategy is considered to be the key plan within a borough’s LDF and each borough is producing its own individual Core Strategy. The Core Strategies reflect the vision of each borough’s Community Strategy<sup>2</sup> and must be in general conformity with the Mayor’s London Plan.

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<sup>2</sup> A Community Strategy is produced with key local partners and sets out the strategic vision for a place.

**Figure 1.2: Relationship between regional and local plans**



1.9 A range of other plans sit under the boroughs' Core Strategies. These include Statements of Community Involvement which describe how residents and other interested parties are involved in the development of planning policy, Supplementary Planning Documents (SPDs) e.g. for residential design, Area Actions Plans (AAPs) for specific neighbourhoods or town centres and finally, Development Plan Documents (DPDs) which address a range of key issues such as the allocation of sites to particular types of development (e.g. housing and waste) and development control policies. All documents within the LDF must be consistent with boroughs' Core Strategies and help deliver the relevant elements of the partner boroughs' Community Strategies.

therefore been taken to ensure the Waste Plan supports emerging Core Strategies. This has been achieved by agreeing common objectives for each boroughs' Core Strategy Waste Policies. In turn, these policies are supported by the Vision and Objectives of the South London Waste Plan. The Vision and Objectives of the South London Waste Plan also reflect the relevant aims of each borough's Community Strategies.

1.10 Figure 1.2 identifies that the South London Waste Plan is being prepared alongside the Core Strategies for Croydon, Kingston and Merton. Care has

## Section 2: The need to plan for waste

2.1 In response to European Directives on waste management, a wealth of national guidance and policies exist to support the sustainable management of waste. Full details are provided in the Sustainability Appraisal of this Plan. This section summarises key drivers for the South London Waste Plan.

### National drivers

2.2 Planning Policy Statement 10 on sustainable waste management requires all UK Waste Planning Authorities to plan for the sustainable management of waste. This national policy guidance recognises the UK's reliance on landfill and its limited capacity to recycle, compost and treat waste in other ways. National and regional guidance acknowledges that



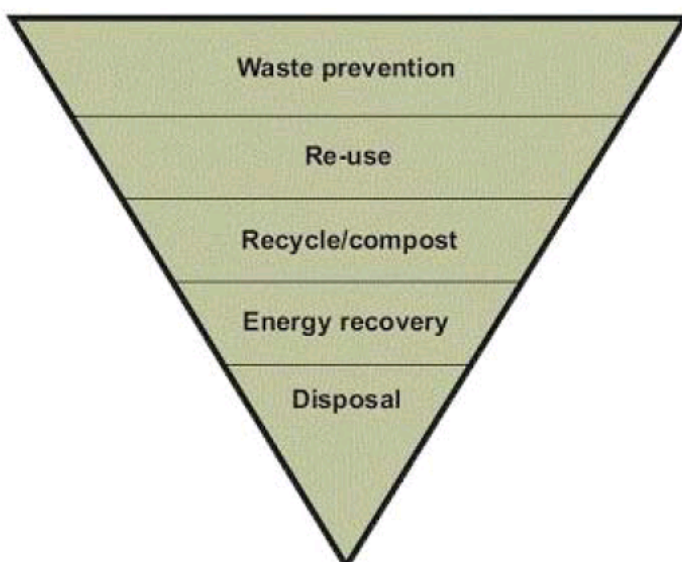
burying waste in the ground in landfill sites is no longer sustainable. This practice not only wastes resources which could be

recycled; the breakdown of waste in landfill also releases the powerful greenhouse gas methane, which, if not properly managed, contributes to climate

change. National policy therefore encourages less waste to be treated in landfill, more to be recycled and composted and energy and heat to be extracted from waste for the local communities' benefit. The 'waste hierarchy' identifies the preferred environmental options.

2.3 This change is being driven by recycling targets (see Table 2.1.) together with a suite of market mechanisms to make landfill more costly than treating waste higher up the waste hierarchy. These include annually escalating costs for disposal of waste to landfill and the risk of fines for local authorities (and an increasing burden on local taxpayers) if challenging landfill reduction targets aren't met. Consequently, landfill is no longer a financially viable option for local councils.

Figure 2.1: The Waste Hierarchy



Waste prevention / Reduce: Reducing the amount of waste produced.

Reuse: The reuse and repair of items, to prolong their life.

Recycling / composting: Recycling involves the recovery of materials for use in other products and includes composting.

Recover: Energy can be recovered from waste by using it as a fuel. Within this category, facilities which produce heat and power are preferable to those which simply burn waste.

Residual Disposal: Disposal is generally through landfill or thermal treatment without energy recovery.

**Table 2.1: Recycling targets by waste stream**

Waste stream	Recycling / Composting target	Source
Municipal waste	45% by 2015	The Mayor's Adopted London Plan (2008)
	50% by 2020	The Mayor's Draft Replacement London Plan (2009)
	50% by 2020	The partner boroughs' Joint Municipal Waste Management Strategy (JMWMS)
Commercial and Industrial waste	70% of this waste stream be recycled / composted by 2020.	The Mayor's Adopted London Plan (2008)
Construction and demolition waste	95% of this will be recycled <i>on-site</i> by 2020 (i.e. recycled where it is produced, therefore needing few specialist facilities).	The Mayor's Adopted London Plan (2008)

**Regional drivers**

2.4 Regionally, the Mayor of London has also set challenging recycling targets. Approximately 6.6 million tonnes of the 22 million tonnes of waste London produces ends up in landfill (GLA, 2008). Much of this is un-segregated waste and means that resources are being lost as materials that could be re-used or recycled are not being recovered.

2.5 Environment Agency data on the movements of waste to landfill reveals that 76% of London's Municipal Waste which is landfilled goes to landfill sites in the East

and South-East England regions (EA, 2010). Of London's commercial and industrial waste which is landfilled, approximately 60% is exported to the East and South East regions (EA, 2010).

2.6 In acknowledgement of the environmental impacts of transporting waste, the Mayor of London encourages the disposal of waste in the nearest appropriate installation and has ambitions to manage more waste within the capital.

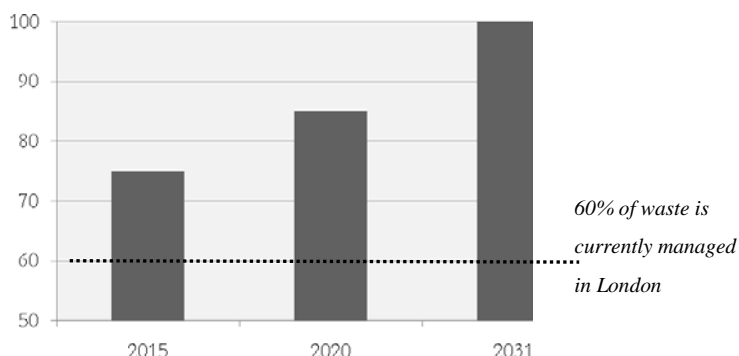
2.7 The Mayor's London Plan describes the management of waste as that which is:

- Used in thermal treatment facilities in London to provide energy (e.g. through anaerobic digestion and other advanced thermal techniques such as pyrolysis and gasification), or;
- It is sorted into materials which can be composted and those which can be recycled.

2.8 Currently, London manages around 60% of its waste within its borders (GLA, 2008). To improve this, the Mayor's London Plan (GLA, 2008) sets targets to increase the amount of London's waste to be managed within the capital, reaching 85% by 2020 and 100% by 2031 (GLA, 2009).



**Figure 2.2** Targets for waste management self-sufficiency in London



2.9 To achieve the Mayor’s ambitions for greater self-sufficiency in waste management, all London boroughs are required to manage a proportion of London’s waste within their own boundaries. This is known as the *waste apportionment*.

**Local drivers**

2.10 Locally, all boroughs’ Community Plans have targets and objectives to minimise waste, reduce the amount disposed of in landfill, increase recycling and reduce carbon outputs. These ambitions are cemented in the partner boroughs’ emerging *Joint Municipal Waste Management Strategy (JMWMS)* (due to be published in autumn 2010). The JMWMS includes the boroughs’ aim to achieve 50% recycling and composting by 2020.

2.11 Within the South London Waste Plan area, roughly 1.1 million tonnes of waste is produced each year and traditionally, this has been disposed of in landfill. In the Waste Plan area, over 600,000 tonnes of waste per year is generated by local businesses and industry and over 400,000 tonnes is collected as municipal waste by local authorities. In 2008-09, 70% of this municipal waste was buried in landfill and

30% was recycled or composted. Around 60% of the waste generated from our local businesses and industry is also landfilled.

2.12 In South London, it is recognised that our existing capacity to compost, recycle and treat waste in facilities outside landfill is low, when compared with the Mayor of London’s *waste apportionment* for the Waste Plan area. This critical factor indicated a need to review the partner boroughs’ existing policies related to waste development. It provided an opportunity for the boroughs to work together to develop a clear vision to facilitate the supply of more sustainable waste management for the sub-region.

2.13 In addition to the policy guidance on sustainable waste management, Government has set out eight guiding principles, which underpin the development of all LDF documents, including the South London Waste Plan. These are:

**(i) Understanding of the Needs of the Local Community and the Waste Plan area’s context.** The Waste Plan is based on a clear understanding of the waste management needs of its local communities and the opportunities and constraints affecting the partner boroughs. Its preparation has been informed by evidence gathering on a range of key planning issues (see Appendix 1).

**(ii) Consistency with International, National and Regional Policy.** The Waste Plan takes account of Government guidance, as set out in planning Policy Guidance (PPG) and in Planning Policy

Statements (PPS). The partner boroughs consider that the South London Waste Plan conforms generally with policies in the Mayor Adopted London Plan (2008) whilst taking account of the emerging London Plan (2009).

**(iii) Integration with Other Strategies.**

The Waste Plan sets out the partner boroughs' vision for sustainable waste management; one in which waste is considered a resource and where benefits to local communities are realised. The strategy identifies local priorities within the partner boroughs' Core Strategies as well as the South London Waste Partnership's Joint Municipal Waste Management Strategy.

**(iv) Sustainability.** Sustainable development lies at the heart of the planning system. The purpose of sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of new or revised DPDs or SPDs<sup>3</sup>.

Accordingly, the partner boroughs have undertaken SA at each stage of Waste Plan's preparation: 'Issues and Options' (2008), 'Potential Sites and Policies' (2009), 'Additional Sites' (2010) and Proposed Submission (2010).

The SA Report on the Proposed Submission version of the Waste Plan is

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<sup>3</sup> Development Plan Documents and Supplementary Planning Documents

available for public comment alongside this document. The Council's approach to SA incorporates the requirements of the Strategic Environmental Assessment Directive, which requires strategic environmental appraisal to be undertaken on all plans and programmes with significant impacts. An Equalities Impact Assessment has also been undertaken as part of the SA process to ensure the South London Waste Plan will not adversely affect members of socially excluded or vulnerable groups and to meet the partner boroughs' statutory duties under the Disability Discrimination Act (1995), Race Relations Amendment Act (2000) and other regulations.

**(v) Continuous Involvement of Stakeholders.**

The partner boroughs have informed, involved and consulted the local community and all interested parties, including the waste management industry, throughout the preparation of the Waste Plan in line with the measures set out in the boroughs' adopted Statements of Community Involvement (SCI). The Statement of Consultation sets out the consultation measures undertaken and summarises the main issues raised. It also identifies how responses have been taken into account, in this Proposed Submission version of the Waste Plan.

**(vi) Spatial Planning.** The Waste Plan must be a 'spatial plan'. Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and other use of land with other policies and programmes which influence the nature of places and how they function.

**(vii) Deliverability.** The Waste Plan must be deliverable; the sites and policies must support the growth needed. National guidance requires the partner boroughs to demonstrate that, “*the stock of allocated land does provide sufficient opportunities...*” and that to achieve this, “*consideration should be given to any identified constraints to site deliverability.*”<sup>4</sup> In developing the Waste Plan therefore, the partner boroughs have had regard to the investment and operational plans of the waste management industry and land owners. As spatial planning is not limited to the activities that are controlled by the Council, working with partners and other agencies will be vital to the successful implementation of this Plan.

**(viii) Flexibility.** To ensure sufficient additional waste management capacity is delivered, the Waste Plan must provide some flexibility to adapt to changing circumstances. The time frame for the Waste Plan is 10 years, as set out in national guidance. However, where known issues which fall beyond this time period are known, these are identified within the Waste Plan. The Waste Plan will also be monitored annually through each borough’s monitoring and reporting processes which will pick up new and changing issues.

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<sup>4</sup> Paragraph 7.26 of Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10 published by the Department for Communities and Local Government, 2006.

## **Preparation of the South London Waste Plan**

2.14 All boroughs have an adopted Statement of Community Involvement which form part of their LDFs<sup>5</sup> and the South London Waste Plan has been prepared in accordance with these. Where requirements in boroughs’ SCIs vary, the most stringent requirements were adhered to. This enabled a common approach to consultation to be implemented across the entire Plan area.

2.15 Three consultation stages have previously taken place:

### **Stage 1: ‘Issues and Options:’ September to October 2008**

2.16 In this initial stage of consultation, comments were sought on the suggested criteria that the four boroughs would use to compile a ‘*long list*’ of potentially suitable sites for waste management facilities. At that time, no specific sites were identified, but the area of search for sites was defined as existing waste sites and industrial areas identified in each of the four boroughs’ Unitary Development Plans, in accordance with guidance in the Mayor’s London Plan. During that consultation period, residents also suggested other sites to be considered. A ‘*long list*’ of around 140 sites was compiled from this information.

2.17 Following this consultation, the potential suitability of the sites on the ‘*long list*’ for waste management purposes was assessed by environmental consultants,

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<sup>5</sup> See page 5 for more details about Local Development Frameworks and Statements of Community Involvement

Mouchel. The assessment looked at issues such as site configuration, proximity to residential areas, traffic impacts and visual intrusion and gave a score to each site. The sites which score well were those which have the fewest constraints and were therefore potentially the most suitable sites for hosting waste management facilities.

2.18 Having a high score however, was acknowledged as not in itself sufficient to determine suitability or availability. In accordance with the need to consider the deliverability of sites, where known or suspected, these constraints were also taken into consideration. An example of a deliverability constraints is where recent planning permission has been granted for another development which results in the site being unlikely to be available during the lifetime of the South London Waste Plan. Another example is where a site is allocated in policy for housing development which is another key priority for the partner boroughs.

2.19 The score from the site assessment process along with a consideration of the deliverability factors enabled the partner boroughs to identify a 'shortlist' of 28 sites. The remaining sites from the 'long list' were considered to have too many obstacles to their development for waste management purposes. These were published online and in an accompanying technical report. Comments on all sites were encouraged during the second stage of consultation

## **Stage 2: 'Potential Sites and Policies:' summer - autumn 2009**

2.20 This second consultation gave residents and other interested parties the opportunity to review and comment on the 28 'short listed' sites, as well as the remaining sites from the original 'long list' which did not make it on to the shortlist. Respondents were also given the opportunity to suggest sites that had not been previously considered (i.e. were not included in the original 'long list' of 140 sites).

2.21 The Stage 2 consultation attracted more than 1,200 responses from local residents, waste industry operators, land owners, national bodies and Government departments. In addition, 200 people attended public workshops and planning officers were also invited to attend 35 face-to-face discussions with local resident groups and organisations to discuss the development of the Waste Plan.

## **Stage 2a: 'Additional Sites:' February to March 2010**

2.22 Eight new sites were put forward by consultees for consideration during the Stage 2 consultation. All eight sites were assessed using the same set of criteria employed at the previous consultation stage. These sites scored relatively poorly and would not have made it on to the shortlist of 28 sites in the previous stage of consultation. This indicates that a number of obstacles had been identified and considerable and significant mitigation measures would need to be implemented before a site could be developed for waste management purposes.



## **Final Stage: ‘Proposed Submission:’ January to February 2011**

2.23 The primary purpose of this latest stage of consultation is to assess whether the South London Waste Plan is ‘*sound*’ and as such, representations are encouraged, where possible, to address *soundness* issues.

2.24 To be considered sound the Waste Plan must be “*justified, effective and consistent with national policy.*”<sup>6</sup>

- *Justified* means the Waste Plan must be founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives
- *Effective* means that the Waste Plan must be deliverable, flexible and able to be monitored.

2.25 The later stages of the South London Waste Plan’s preparation are:

- Submission of the Strategy and final Sustainability Appraisal (March 2011);
- Examination of soundness by an Independent Planning Inspector (July 2011); and
- Adoption of the South London Waste Plan (December 2011).

2.26 The arrangements for publication of this document are in accordance with the Council’s Statement of Community Involvement.

## **The Evidence Base**

2.27 A wide range of evidence base studies have been carried out to inform the Waste Plan’s development. These range from identifying potential concerns arising from traffic on the local road network to identifying specific planning constraints for potential sites. A study has also been carried out to determine the deliverability of potential sites over the plan period. These studies have ensured the policies of the South London Waste Plan address all those issues important to residents and other interested parties within the Waste Plan area. It also ensures that the most suitable sites have been safeguarded for waste use.

2.28 The full range of reports and studies which form the South London Waste Plan’s evidence base is identified in Appendix 1.

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<sup>6</sup> These ‘tests of soundness’ are described national Planning Policy Statement 12:Local Spatial Planning

## Section 3: Plan Area Context and Key Issues

3.1 The development of a Vision for the South London Waste Plan must be informed by an 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 (SA) report<sup>7</sup>. Chapter 5 of 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. Chapter 5 of the SA also describes the amounts of waste produced within the plan area.

3.3 This section will focus on the key issues which the South London Waste Plan must address.

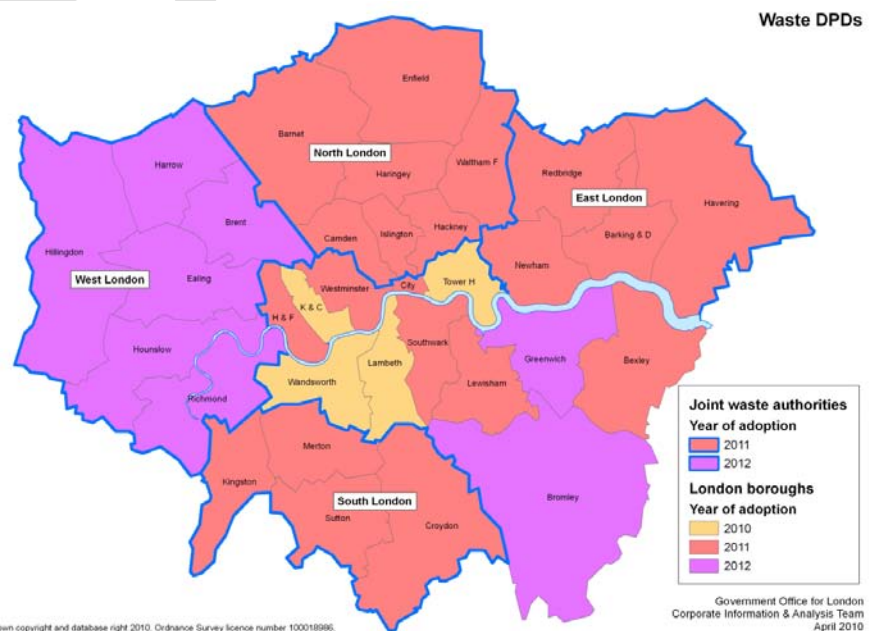
### Key Issue 1: Cross boundary issues

Firstly, it is important to consider the plan area in relation to its neighbouring boroughs and regions. Are there any issues in neighbouring areas which will

impact on the South London Waste Plan? Or do waste-related activities in South London impact on neighbouring areas? To answer these questions, an assessment of the needs of surrounding areas is required, together with the consideration of cross-boundary movements of waste.

3.4 The plan area is located in outer London and, together with Lambeth, Wandsworth and Richmond, forms the South-West London Sub-Region which is identified in the London Plan. Progress on waste planning in the surrounding areas is summarised below:

- Richmond is part of the joint West London Waste Plan, which lies to the west of the plan area. At the time of writing, West London is due to consult on its Preferred Strategy in 2010. The West London Plan area has one of the largest concentrations of industrial land in London (c.1,500 ha)<sup>8</sup> and hosts Park Royal; the



<sup>7</sup> See pages 11-12 for more information about the Sustainability Appraisal Report

<sup>8</sup> GLA (2008) *Industrial Land Capacity Supplementary Planning Guidance*

largest industrial and business park in London occupying 650 hectares. In terms of *supply* of land suitable for waste facilities, the Mayor of London's waste apportionment identifies that, when compared to other London boroughs, Hillingdon, Ealing and Hounslow particularly have capacity to manage waste within their boundaries<sup>9</sup>. In light of this evidence, it is considered that the West London Waste Plan will be capable of meeting West London's own waste management needs.

- Wandsworth's Adopted Core Strategy identifies the borough must allocate 1.75ha of additional land to meet its waste apportionment. The Core Strategy identifies there is sufficient land available within the borough's 53 hectares of Strategic Industrial Land and specific sites will be identified in the borough's Site Specific Allocations Document.
- Lambeth's Adopted Core Strategy identifies a need for an additional 3.4 hectares of land to meet its waste apportionment. The Core Strategy states that sufficient sites to meet this need will be identified in Lambeth's Sites Allocations Development Plan Document.
- To the East lies the South-East London Joint Waste Group covering Bexley, Bromley, Greenwich, Lewisham and Southwark. Their joint Technical Report (March 2010) identifies the South East London region has surplus capacity

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<sup>9</sup> GLA (2009) *Minor Alteration to the Draft Replacement London Plan: Borough Level Waste Arisings and Apportionments and Corrections and Clarifications*

and will provide greater capacity than required by the waste apportionment. This will be provided at 18 strategic safeguarded waste sites across the boroughs.

- To the South, The Surrey Waste Plan was adopted in 2008, with amendments made, by order of the High Court in 2009. Policy CW4 (Waste Management Capacity) identifies that planning permissions will be granted to enable sufficient waste management capacity to be provided to both meet the equivalent tonnage of waste arising in Surrey, *as well a contribution to meeting the declining landfill needs of residual wastes arising exported from London.*

3.5 In summary, all neighbouring London boroughs and counties (Surrey) have identified sufficient land to meet their own waste management needs<sup>10</sup>, or have made significant progress in this regard.

3.6 Regarding cross-boundary waste *movements*, unlike the regional context, the majority of municipal waste produced in the South London Waste Plan area has historically been managed *within* the partner boroughs' boundaries. This is due to the presence of significant landfill and composting facilities at Beddington Farmlands, Sutton.

3.7 In 2008, 90% of the plan area's residual municipal waste<sup>11</sup>, was landfilled

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<sup>10</sup> In London, 'need' is the waste apportionment identified in the Mayor's London Plan. Surrey's 'need' is identified in the Surrey Waste Plan.

<sup>11</sup> Residual waste is that which is left over, once all the recyclables have been taken out.

at Beddington Farmlands (EA, 2010). This trend continues, and since 2008, approximately 200,000 tonnes of municipal waste is annually landfilled at Beddington.

3.8 With regard to the boroughs' recyclable waste, 40% of this (i.e. all kitchen and garden waste) is treated in Viridor's In-Vessel Composting facility at Beddington Farmlands, Sutton. (EA, 2010).

3.9 The remainder of the boroughs' recyclable waste (i.e. the dry recyclables such as tins, plastic bottles, card and paper) is treated in a Materials Recycling Facility (MRF) in Kent. In addition, since 2008, 10,000 tonnes per year of residual waste has been sent to an energy recovery facility near Slough, Berkshire.

3.10 Finally, the partner boroughs operate seven Household Reuse and Recycling Centre (HRRCs) which, since September 2008 have been managed by Environmental Waste Controls (EWC). The HRRC sites allow residents to recycle a wide variety of waste streams including many bulkier items and excess garden waste that cannot be economically collected at the kerbside.

3.11 Recyclables collected at the HRRCs are re-processed into new products. The location of these various re-processing facilities will vary throughout the year, depending on market forces. Some materials may be re-processed in London, whilst others will be re-processed outside of the capital. Since these arrangements change month-by-month, it is difficult to

quantify how much of this waste is re-processed outside of the region.

3.12 The arrangements to treat the boroughs' kitchen and garden waste, recyclables and operation of the HRRCs are contractual arrangements which are fixed until at least 2022. All contracts have the option to be extended by five years, until 2027.

3.13 Regarding commercial and industrial (C&I) waste, there is no borough level data available on the movements of this waste stream. However, London-wide data reveals that whilst the majority of landfilled C&I waste is disposed of in facilities outside London, 100,000 tonnes is disposed of at the landfill facility in Beddington, Sutton each year. In addition, two Surrey landfills receive around 100,000 tonnes of London's waste each year. Given the close proximity of these facilities to businesses and industry within the plan area, it is likely that much C&I waste is deposited at these sites.

3.14 EA data further reveals that the landfill facility in Beddington, Sutton accommodated over 500,000 tonnes of waste in 2008. Given that 200,000 tonnes of the boroughs' municipal waste is currently deposited here, plus an additional 100,000 tonnes of London's commercial and industrial waste, it is assumed that the balance includes some imports from outside the plan area.

3.15 In summary, the evidence shows that surrounding areas are able to accommodate their own waste needs and do not impact on the South London Waste Plan area. Furthermore, evidence shows



the exports from the South London Waste Plan area are limited to reasonably small quantities of municipal waste to a Materials Recycling Facility in Kent and an energy recovery facility in Berkshire. This contractual arrangement is ongoing throughout the plan period. The other key exports from the plan area are commercial and industrial waste, though quantities and destinations are largely unknown and there are some imports from outside the plan area to the landfill facility at Beddington, Sutton. Finally, as identified previously, that Surrey's Waste Plan does accommodate decreasing waste exports from London, to landfill throughout the plan period.

3.16 The key issues for the South London Waste Plan to consider in relation to cross-boundary issues are:

- To accommodate the partner boroughs' waste apportionment within the plan area. This will complete SW and SE London's contribution to the Mayor of London's target to treat 85% of London's waste within the capital by 2020.
- To accommodate the partner boroughs' waste apportionment within the plan area which in turn will provide increased recycling, composting and disposal capacity for commercial and industrial waste within the plan area.

3.17 These issues are addressed within the Waste Plan's Vision, Objectives and Policies SLWP1 (existing waste sites) and SLWP 2 (allocated sites) (see Section 4).

### **Key Issue 2: How much waste must the South London Waste Plan accommodate?**

3.18 The accompanying Technical Report (Evidence Base Study 4) provides a detailed analysis of how much waste is produced within the plan area. In total, around 1.1 million tonnes of waste is produced within the plan area each year:

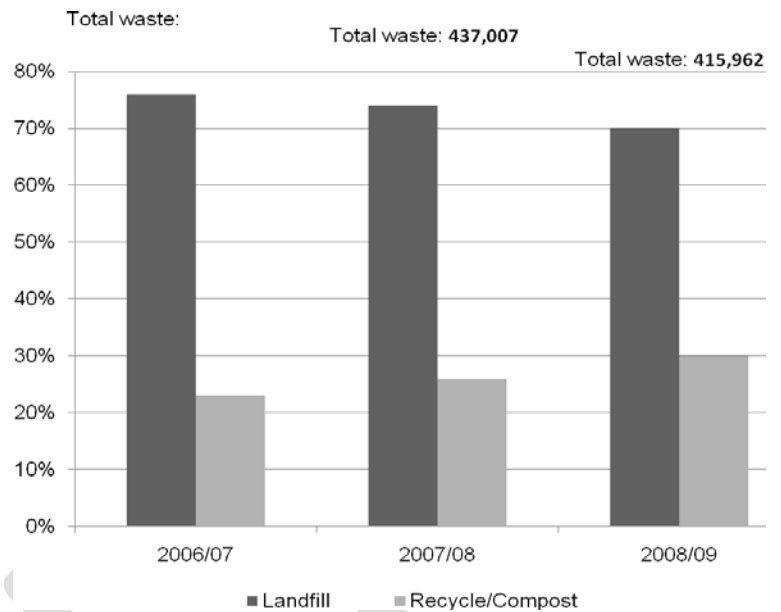
- 600,000 tonnes is generated by local businesses and industry each year;
- Over 400,000 tonnes is collected as municipal waste by local authorities
- Around 16,000 tonnes of hazardous waste is produced
- Plus unknown quantities of construction and demolition wastes which are likely to be significant, but, as for London as a whole, the majority is expected to be recycled onsite.
- In addition, sewage waste which is treated in sewage treatment plants at Thames Water's facilities in Beddington Farmlands, Sutton and the Hogsmill Valley, Kingston. It should be noted that policies within Sutton and Kingston's Core Strategies recognise and support any necessary expansions to this important infrastructure in order to accommodate growth.

3.19 The amount of waste produced annually throughout the plan period is expected to rise by around 60,000 tonnes to almost 1.3 million tonnes over the Waste Plan period. The Mayor of London's waste apportionment (GLA, 2009) for the plan area is slightly lower than the anticipated arisings, reaching the

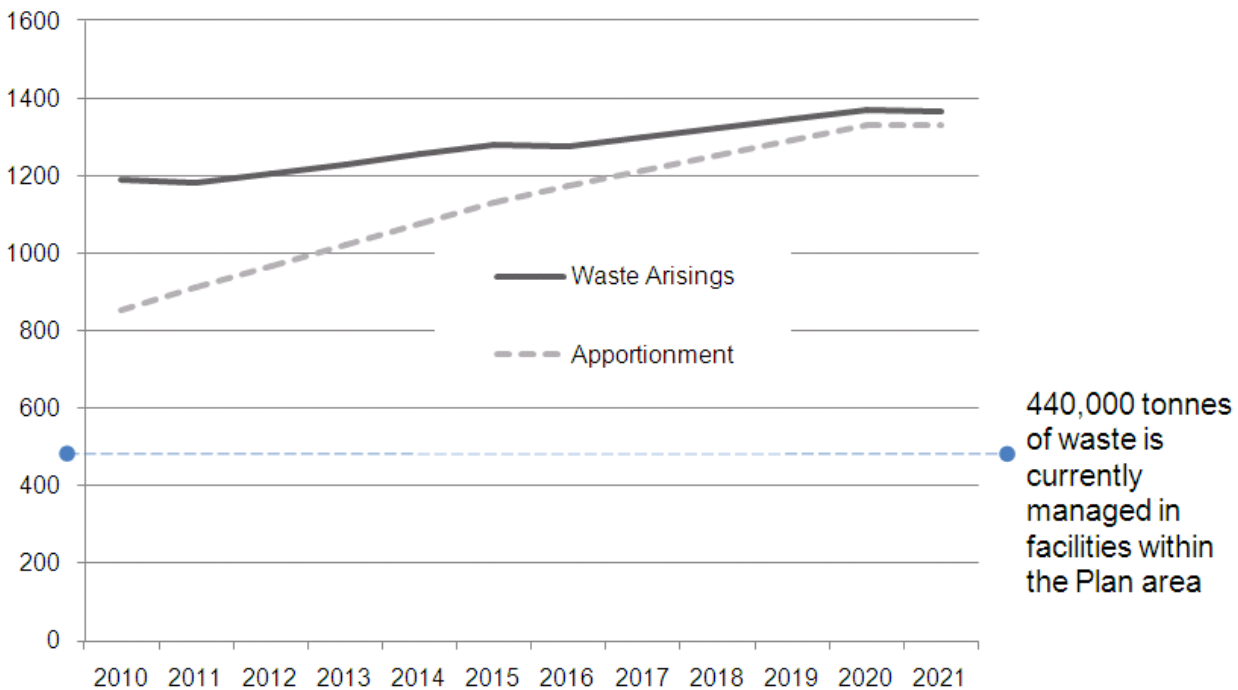
equivalent of 97% of waste arisings in 2020.

3.20 Figure 3.2 shows the anticipated waste growth for the South London Waste Plan area is shallow. Although population growth and employment growth are expected in the sub-region, the partner boroughs are committed to waste minimisation and to curbing the amount of waste each person and employee produces.

**Figure 3.3** Quantity and fate of municipal waste, South London 2006-2009



**Figure 3.2:** Waste arisings (000s tonnes per year) and the annual apportionment for the Plan area



3.21 The success of the partner boroughs' commitment to waste minimisation is evident in recent years' municipal waste figures, which show a decrease in the overall quantities produced:

3.22 Waste minimisation will remain a key priority throughout the plan period for all partner boroughs. It features strongly in the boroughs' emerging Joint Municipal Waste Management Strategy (JMWMS) which describes how they will manage waste more sustainably. This strategy is

due to be published in late 2010 and contains the following targets to minimise waste:

**JMWMS Target 3:** *“Zero growth in the amount of waste produced by each household per year.”*

**JMWMS Target 4:** *“Zero overall waste growth from 2019/20 (i.e. even when new houses are built there is not an increase in total waste produced).”*

**JMWMS Target 5:** *“To reduce the amount of waste not re-used, recycled or composted by residents of the South London Authorities to 225 kg per capita by 2020.”*

**JMWMS Target 7:** *“To promote and facilitate initiatives that maximise the reuse of goods and materials (in particular bulky goods) before they enter the waste stream, by developing additional partnerships with charities and third sector groups.”*

**JMWMS Target 8:** *“To continue support for home composting.”*

3.23 These are challenging waste prevention targets and the Joint Municipal Waste Management Strategy (JMWMS) recognises the need to build on existing work and develop co-ordinated waste awareness and education actions amongst the Authorities.

3.24 The JMWMS also commits the boroughs to undertaking additional campaigns and programmes which will be identified to help reduce arisings and increase public awareness about waste issues.

3.25 With regard to reducing the amount of waste produced per *employee* in local businesses and industry, the Environment Agency observes that the majority of businesses in London employ less than 5 people. They surmise that the smaller the business the less time and resource will be available to address environmental issues and that many smaller businesses who want to improve their environmental performance don't know where to begin (Environment Agency, 2010).

3.26 To address this, the boroughs' JMWMS acknowledges that increasing commercial and industrial recycling rates will require increased education and promotion amongst local businesses. The South London Waste Partnership is committed to sharing knowledge and developing actions to be undertaken across all partner boroughs. Key objectives within the JMWMS to improve recycling rates for commercial and industrial waste are:

- **JMWMS Objective 1:** *“The Partnership will take a coordinated approach to waste awareness and education by encouraging the sharing of best practice between the Authorities with respect to waste education and awareness and by engaging with residents and local businesses.”*

- **JMWMS Objective 15:** *“The Partnership will encourage the Authorities to promote commercial waste recycling.”*

3.27 The key issues for the South London Waste Plan to consider in relation to how much waste the plan must manage are:

- To accommodate the partner boroughs' waste apportionment within the plan area.
- To provide additional capacity above the apportionment, to enable the boroughs to manage the equivalent tonnage of all waste occurring within the plan area.

3.28 This issue is addressed within the Waste Plan's Vision, Objectives and Policies WP3 (existing waste sites) and WP4 (allocated sites) (*see Section 4*).

### **Key Issue 3: What number and range of waste facilities are needed?**

3.29 The locations and types of existing waste management facilities within the South London Waste Plan area are shown in Figure 3.4. (*Note: Full page map to be inserted as landscape in final document*)

3.30 This shows there are five metal recycling facilities, four sites solely dedicated to household re-use and recycling centres (which in effect, act as open-air Materials Recycling Facilities), a further three household re-use and recycling centres which share a site with the boroughs' waste transfer stations, two composting facilities and two Materials Recycling Facilities (MRFs).

3.31 In addition, the plan area hosts a number of waste transfer stations. These facilities do not manage waste (under the London Plan definition of waste management); they simply act as depots for the storage of waste which is then sent on to be treated elsewhere.

3.32 In total, the plan area's existing waste *management* facilities are capable of treating just over 440,000 tonnes of waste per year. Figure 3.2 shown previously identifies the plan area already produces in the region of 1.1 million tonnes of waste each year. There is therefore already insufficient capacity to manage the equivalent tonnage that is produced within the plan area.

3.33 The difference between the plan area's *existing capacity* and the *waste apportionment* (i.e. the minimum quantity of waste the plan must accommodate) is:

- 410,000 tonnes at 2011
- 690,000 tonnes at 2016
- 890,000 tonnes at 2021

3.34 For planning purposes, these figures have been converted to a land take using an average throughput per hectare rate of around 60,000 tonnes per hectare. This results in the following land take requirements:

- 7 hectares at 2011
- 11 hectares at 2016
- 14 hectares at 2021

3.35 To contribute to this land take need, it is possible to look towards the re-development of existing waste transfer stations. The South London Waste Plan encourages the re-development of these sites from *transfer* to facilities which actually *manage* the waste onsite. Given that a priority of the plan is to treat more waste locally, it is logical that, over the plan period, fewer facilities will be needed to transfer waste out of the plan area. This frees such sites up for development as waste management sites.



3.36 Within the plan area, the total amount of land occupied by the transfer facilities is over 30ha. The accompanying Technical Report (Evidence Base Study 4) and Deliverability Report (Evidence Base Study 3) identify that 8 hectares of this land are likely to be turned into waste management facilities during the lifetime of this Plan.

3.37 Subtracting this 8 hectares from the land needed to meet the apportionment leaves a requirement to identify 7 additional hectare of land to meet the London Plan's waste apportionment (GLA, 2009) or 2 hectares, to strive to meet the equivalent of 100% of waste arisings.

- 0 additional hectares needed in total at 2011
- 3 additional hectares needed in total at 2016
- 6 additional hectares needed in total at 2021, or;
- 7 additional hectares needed in total at 2021 to strive to manage the equivalent of 100% of waste arisings within the plan area.

3.38 With regard to the *type* of facilities needed, it is important to consider the plan area's existing facilities, recycling targets and contractual arrangements in place for municipal waste.

3.39 Schedule 1 which appears within Section 4 of this document lists all existing waste facilities. It shows that all existing capacity are those which recycle or compost waste. There are currently no disposal facilities within the plan area outside of landfill.

3.40 For commercial and industrial waste, the recycling rate lags behind that achieved for municipal waste (Environment Agency, 2010). For the South London Waste Plan area, less than 30% of commercial and industrial waste is recycled, with around 60% disposed of in landfill (Environment Agency, 2003). In order to achieve recycling targets of 70% for commercial and industrial waste, an additional capacity of around 160,000 tonnes is needed at 2021 to recycle, compost and sustainably dispose of commercial and industrial waste.

3.41 For municipal waste, the contractual arrangements described previously for the management of recyclables and compostable waste are in place for the lifetime of this Plan. These contracts fulfil the partner boroughs' recycling and composting needs throughout the period of this South London Waste Plan and will enable the partner boroughs to meet the 50% recycling / composting target at 2020. The partner boroughs therefore have no need during the lifetime of this Plan for additional recycling and composting facilities.

3.42 It should be noted that the kitchen and garden waste collection schemes within the partner boroughs are due to be expanded within the lifetime of this Plan. The roll out of additional collection services is due to be complete in March 2012. To accommodate this, Viridor has submitted an application to Sutton Borough Council to build an Anaerobic Digestion plant on their existing operational land at Beddington, Sutton. The application was submitted to Sutton in

March 2010 and at the time of writing, is awaiting determination. The plan proposes to treat an additional 30,000 tonnes of the partner boroughs' kitchen and garden waste each year. This additional facility will ensure the partner boroughs' needs are accommodated throughout the initial period of this Plan.

3.43 With regard to *residual* municipal waste (that which is currently landfilled at Beddington farmlands, Sutton), the South London Waste Partnership is now in the latter stages of a procurement exercise to secure a contract for the more sustainable treatment of this waste. This is due to be awarded in 2011 and will enable the partner boroughs to meet their statutory landfill reduction targets thus avoiding the heavy financial penalties for continued reliance on landfill.

3.44 Any new facility (or facilities) are expected to be operational by 2014 and the contract will be for a period of up to 30 years. It is anticipated therefore, that any new treatment facility (or facilities) will be operational until around 2040; well beyond the initial lifetime of this Plan.

3.45 For the purposes of the procurement the South London Waste Partnership is technology neutral and therefore all forms of treatment put forward will be properly and fairly evaluated. A summary of existing and emerging waste technologies is provided in Table 3.1. In describing the criteria by which the South London Waste Partnership will evaluate proposals for this contract, the partner boroughs state that they will, "...reward high-performing, low emission, modern, sustainable technologies that offer residents value for

*money. All boroughs within the Partnership are firmly against poor performing, outdated technologies such as old fashioned, mass burn incineration, which is poorly designed, visually intrusive and releases high levels of noxious emissions. All thermal treatment facilities must meet the requirements of the Waste Incinerator Regulations 2002, to ensure they are operated to high environmental standards."* (South London Waste Partnership, 2010).

3.46 With regard to sites for residual treatment, In its Outline Business Case (OBC) to DEFRA to support its case for funding credits, the South London Waste Partnership indicated that the new treatment facility(ies) could be accommodated on existing waste transfer stations either at Factory Lane, Croydon, Garth Road, Merton or Villiers Road, Kingston. However, it should be noted that the partner boroughs have not ruled out the use of any other suitable sites.

3.47 The partner boroughs' transfer stations have been found to be deliverable for waste treatment facilities (South London Waste Plan, 2010c) and are safeguarded for waste use in Policy SLWP1 (Existing Waste Sites) of this Plan (*see Section 4*). It is therefore considered that the South London Waste Plan Waste Plan has accommodated the needs of the partner boroughs with regard to identifying suitable sites for their waste treatment needs.

3.48 It is feasible that the redevelopment of any of the partner boroughs' transfer stations could result in the displacement of other existing facilities onsite, notably the

boroughs' HRRCs which exist on the three identified transfer stations. However, until the partner boroughs identify the Preferred Bidder (which will occur at around the time of Submission of this Waste Plan), this is not known. It may be possible for the capacity of any displaced HRRC to be accommodated by intensifying provision at one of the remaining HRRCs.

Alternatively, an additional site may be required to provide a new HRRC. In policy terms, the priority locations for any additional HRRC will be those sites identified in policies SLWP1 (Existing Waste Sites) and SLWP2 (Allocated Sites).

3.49 Whilst the South London Waste Plan addresses the period 2011 to 2021, it is important to identify any known issues due to emerge shortly beyond the lifetime of this Plan. The previous description of the boroughs' arrangements to manage municipal waste identifies that existing contracts for the treatment of kitchen and garden waste, HRRCs and dry recyclables ends in 2022.

3.50 Although there is an option for this to be extended to 2027, a key planning consideration which would currently prevent this is the expiration of planning permission for the landfill and associated waste management facilities at Beddington Farmlands, Sutton which is currently 2023. (This will include the expiration of the new 30,000t Anaerobic Digestion facility, should this be awarded planning permission at Beddington Farmlands). From 2022/2023 therefore, the partner boroughs will have a

requirement for additional recycling / composting capacity to meet their needs.

3.51 It is recognised that this is beyond the initial lifetime of this Plan and is an important issue which will be considered in the latter stages of the Waste Plan's monitoring.

3.52 In summary, whilst the recycling / composting needs of the boroughs are satisfied by contractual arrangements for the lifetime of this Plan, residual treatment for municipal waste *is* required. In addition, the whole range of recycling, composting and residual treatment facilities are needed for commercial waste. A range of facilities, including type, size and mix of technologies, will therefore be necessary to meet the overall capacity requirements.

3.53 Recycling, composting, recovery and processing facilities cover a range of technology types that will have specific site characteristics. A summary of existing and emerging waste technologies is set out below:

**Table 3.1:** *Description of modern waste management facilities*

<b>Summary of existing and emerging waste technologies:</b>	
<b>Materials Recovery Facility (MRF)</b>	Treat mixed dry, recyclable materials. MRFs identify different waste types (paper, cans etc) and mechanically and/or manually sort and segregate them. Materials are bundled and transported to re-manufacturing facilities, for processing into new products.
<b>Composting</b>	Modern composting is covered, takes place in 'in-vessel' composting facilities, with well-regulated airflow to reduce odours.

Summary of existing and emerging waste technologies:
<p><b>Mechanical Biological Treatment (MBT)</b> Separates organic material and dry recyclables from mixed waste, recovering the recyclables for the manufacturing industry and the organic element usually for fuel use or composting.</p>
<p><b>Anaerobic Digestion (AD)</b> A type of composting facility, in the absence of Oxygen. AD facilities produce a biogas by-product that can be used as a fuel source to provide renewable energy. AD facilities typically process food waste.</p>
<p><b>Modern thermal treatment including Pyrolysis and Gasification</b> Thermal treatment facilities use high temperatures to break down waste and can produce energy in the form of heat and power. Modern processes including pyrolysis and gasification use less oxygen than traditional mass-burn incineration and emit fewer air emissions. An advantage of some modern facilities is that they can be designed to be modular; they're made up of small units which can be added or taken away as waste streams or volumes change.</p>

3.54 In response to this evidence, the key issues for the South London Waste Plan to consider in relation to how much waste the Waste Plan must accommodate are:

- To accommodate the possible need for any additional HRRCs within the lifetime of this Plan
- To provide possible suitable sites for the more sustainable disposal of the partner boroughs' residual municipal waste.
- To provide suitable sites for the recycling, composting and other treatment of commercial and industrial waste
- To liaise with the South London Waste Partnership towards the end of the lifetime

of this Plan, to ensure their need for additional recycling/composting facilities after 2022 is accommodated in the next iteration of the South London Waste Plan.

- To accommodate any additional need for waste facilities to treat other waste streams

3.55 These issues are addressed within Policy SWP1 (Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste), Policy SWP2 (Strategic Approach to other forms of waste), Policy SLWP1 (Existing Waste Sites) and Policy SLWP2 (Allocated Sites) (*see Section 4*).

**Key Issue 4: Waste Transfer Stations**

3.56 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, the need to transfer waste to facilities *outside* the plan area will naturally reduce as more facilities are developed.

3.57 However, this is likely to take time; time for contractual arrangements governing the movement of waste outside London to expire and for new facilities to achieve planning consent and be operational.

3.58 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples include the continuing transfer of hazardous waste to a small number of specialist treatment facilities outside London, or the transfer of waste to an existing recycling facility

located in close proximity, but just outside the plan area's borders. In addition, when considering the environmental impacts of proposals, the transfer of waste, particularly by rail for example, may result in lower environmental impacts than treating waste in the capital. Although the South London Waste Plan acknowledges that as much waste as practically 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.

3.59 In response to this evidence, the key issues for the South London Waste Plan to consider in relation to the transfer of waste are:

- To accommodate the diminishing need for waste transfer stations.
- To accommodate the transfer of waste out of the plan area, where this is more appropriate than managing waste within the plan area.

3.60 These issues are addressed within Policy WP3 (Existing Sites) and WP5 (Unallocated Sites)

### **Key Issue 5: Climate Change**

3.61 The potential for waste rich in biomass (waste wood and food) to provide a significant contribution to the UK's renewable energy supply has been identified in the UK Renewable Energy Strategy (DECC, July 2009).



3.62 In London, the Mayor also has ambitions to increase the proportion of energy generated from renewable sources (GLA, 2009) and specifies targets for increasing the energy output from anaerobic digestion, pyrolysis and gasification. The energy output from these facilities is expected to account for almost 20% of London's renewable energy generation in 2025 (GLA, 2009).

3.63 Furthermore, to ensure maximum environmental benefits, national and regional policies encourage heat generated from these waste management processes to be captured for local use. The generation and supply of heat alongside electricity through Combined Heat and Power improves the efficiency of a facility, reducing energy used and thereby lowering carbon emissions. Furthermore, supply of heat users replaces the need for conventional power generation, thus lowering carbon impacts further.

3.64 Given the importance of minimising green house gas emissions, the Mayor of London supports the provision of heat through decentralised energy networks. All boroughs within the South London Waste Plan have begun to identify heat users and, should anticipated demand be identified, to identify potential decentralised energy networks. Although this work is at its developmental stages, it is important that the South London Waste Plan supports the provision of waste facilities (notably anaerobic digestion, pyrolysis and gasification facilities) and the distribution of heat and power.



3.65 In response to this evidence, the key issues for the South London Waste Plan to consider in relation to the provision of decentralised energy are:

- To support the development of anaerobic digestion, pyrolysis and gasification facilities where heat and power is provided;
- To encourage the distribution of heat and power through decentralised energy networks.

3.66 These issues are addressed within Policy DWP1 (Sustainable Design and Construction) and Policy DWP4 (Sustainable Energy Recovery).

#### **Key Issue 6: Scarcity of available land**

3.67 In accordance with the Mayor's London Plan, all designated industrial sites across the four partner boroughs formed the 'area of search' for sites to be allocated in the South London Waste Plan.

A key requirement for the allocation of these sites within the South London Waste Plan is their deliverability; it is important that allocated sites have a strong likelihood of being developed for waste purposes. To ensure this, local authorities and key stakeholders should undertake timely, effective and conclusive discussions on matters of the deliverability of the options of the Waste Plan.

3.68 National planning guidance<sup>12</sup> describes the deliverability of sites as those which are:

- **Available** – *the site is available now;*
- **Suitable** – *the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities, and;*
- **Achievable** – *there is a reasonable prospect that housing will be delivered on the site within five years.*

3.69 With regard to the availability of land, National policy guidance on waste planning<sup>13</sup> advises that waste planning authorities should avoid unrealistic assumptions on the prospects, having regard in particular to any ownership constraint which cannot be readily freed, other than through the use of compulsory purchase powers.

3.70 A report on the deliverability of sites has been prepared (Evidence Base Study 3: Deliverability) and identifies a scarcity of available new site (i.e. those not already within waste use) within the initial 10 year period of this Plan (2011 to 2021).

3.71 This supports the earlier findings of the Mayor of London's Industrial Capacity SPG (March, 2008) which concludes that the South London partner boroughs have very little surplus land.

3.72 The boroughs' own studies into the availability of land for businesses and industry also identify a scarcity of land

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<sup>12</sup> DCLG (2010) Planning Policy Statement 3: Housing

<sup>13</sup> ODPM (2005) Planning Policy Statement 10: Sustainable Waste Management



available for these purposes with demand outstripping supply; reflected in low turnovers typical across the four boroughs. The boroughs own studies support the safeguarding of all industrial land in order to satisfy market demand.

3.73 Given this evidence, it is critical that the South London Waste Plan does not unnecessarily designate land for waste planning purposes which will decrease the overall supply of land for other businesses and industry and stifle these important growth areas.

3.74 A report commissioned by the South London Partnership (which includes the four partner boroughs) identifies strong employment growth and therefore demand for employment land over the plan period.

3.75 It is essential therefore that only that land which is needed to meet the partner boroughs' waste management needs is allocated for waste purposes. Over provision would result in a decreasing supply of land for growing businesses. The supply of land needed for waste management purposes identified in this initial Plan period for the South London Waste Plan reflects the boroughs' waste management needs over the next 10 years. In order to ensure that supply is always related to need, this will require monitoring in line with policies WP1, WP2 and WP3.

3.76 Because land is scarce, it is also essential that any waste development maximises its throughput, planning constraints permitting.

## Section 4: Vision, Objectives & Policies

4.1. The objectives for the South London Waste Plan are set out in the four partner boroughs' emerging or adopted Core Strategies. The common objectives set out in each emerging Core Strategy document are that:

- By working in partnership, the four boroughs will seek to maximise self-sufficiency in managing the waste generated within the four boroughs;
- The boroughs will identify sufficient land to enable this;
- The boroughs will be guided by national and regional policy and the potential of strategic industrial locations, local employment areas and existing waste management sites for the location of sites;
- The boroughs will safeguard existing waste management sites and seek to intensify their development where appropriate; and,
- The boroughs will support the recycling and composting of waste by requiring that new developments provide space to enable the storage and collection of recyclables

4.2. To address these objectives, the partner boroughs have identified a Vision and Objectives for the South London Waste Plan. This was originally consulted upon during the 2008 Issues and Options consultation. Feedback received during that time has been incorporated into the Vision and Objectives for the South London Waste Plan, shown in Table 4.1.

4.3. The Vision for the South London Waste Plan is:

**Table 4.1** Vision and Objectives for the South London Waste Plan

<p><b>Vision</b></p> <p>By 2021, the South London Waste Plan area will have sufficient waste management facilities, in appropriate locations, to meet the identified needs of our communities. The area will be striving for self-sufficiency in sustainable waste management.</p> <p><b>Objectives</b></p> <p>Through the South London Waste Plan, the partner boroughs of Croydon, Kingston, Merton and Sutton will:</p> <ul style="list-style-type: none"><li>• Promote waste minimisation, re-use, recycling and composting in line with reducing net carbon emissions and the waste hierarchy. Where waste cannot be recycled or composted, the maximum value will be recovered from that residual waste.</li><li>• Reduce the climate change impacts of waste management by encouraging waste to be managed close to its source, sustainable forms of transport and exemplary standards of sustainable design and construction.</li><li>• Identify enough land within the partner boroughs of Croydon, Merton, Sutton and Kingston to enable the development of sufficient new waste management facilities to manage the London Plan apportionment figure within the plan's area. To support this, the boroughs will safeguard existing sites and maximise the use of these, where appropriate.</li></ul>
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- Minimise adverse impacts on people and the local environment, taking climate change into account, by having waste facilities in suitable locations, using the best available technologies and ensuring the highest standards of design and layout.
- Involve local communities and other stakeholders in decision making.
- Support the relevant key aims and objectives of Croydon, Kingston, Merton and Sutton’s Community Strategies and Local Development Frameworks and the Joint Municipal Waste Management Strategy.

4.4. The Vision and Objectives will be delivered through a number of policies which guide development to specified areas or sites and set out criteria that must be taken into account by the boroughs when determining proposals for waste development. Since the South London Waste Plan is a joint plan, the policies will be used by all partner boroughs (Croydon, Kingston, Merton and Sutton) when assessing applications for waste management facilities.

**Policies Applicable in the Consideration of Proposals**

4.5. In assessing applications, besides the policies of this plan, consideration will also be given to national and regional guidance, the “saved policies” of the Unitary Development Plan of the relevant borough and the adopted and emerging policies of each borough’s Local

Development Framework. In addition, an Environmental Impact Assessment may also be a statutory requirement.

**Development of Policies through Consultation Stages**

4.6. At the second consultation stage of the Waste Plan’s production<sup>14</sup>, the consultation document included seven policy issues on which stakeholders could comment. Following the receipt of responses and in order to make the document more user friendly, the policies have been amended and re-ordered. There are now two strategic policies, dealing with waste demand and land supply across the four boroughs. Three policies deal with site safeguarding and development and four policies are concerned with development management issues.

4.7. Table 4.2 provides a guide as to how the policies within this document relate to the policies in the Preferred Option document.

**Table 4.2:** Changes to the format of policies from the Stage 2 consultation on potential sites and policies

Proposed Submission Policy	Preferred Option Policy
<b>Strategic Waste Policies:</b>	
<b>WP1:</b> Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste	First part of <b>WP1</b> and amendments following consultation and additional technical data
<b>WP2:</b> Strategic Approach to Other Forms of Waste	Second part of <b>WP1</b> , amendments and additions following consultation

<sup>14</sup> ‘Potential Sites and Policies,’ July 2009

<b>Site Location Waste Policies:</b>	
<b>WP3:</b> Existing Waste Management Sites	<b>WP3</b> and amendments following consultation
<b>WP4:</b> Allocated Sites for Waste Management Facility Development and Areas of Opportunity for Waste Management Facility Development	<b>WP4</b> and amendments following consultation
<b>WP5:</b> Unallocated Sites for Waste Management Facility Development	<b>WP5</b> and amendments following consultation
<b>Detailed Waste Policies:</b>	
<b>WP6:</b> Sustainable Construction of Waste Management Facilities	<b>WP2</b> and amendments following consultation
<b>WP7:</b> Protecting and Enhancing Amenity	Part of <b>WP6</b> with additions and amendments following consultation
<b>WP8:</b> Sustainable Energy Recovery	<b>WP7</b> and amendments following consultation
<b>WP9:</b> Planning Obligations	<b>New:</b> To conform to national guidance – see Para B25 of Circular 05/05 and Para 4.47 of PPS12: Local Spatial Planning

### Superseded Policies

4.8. The policies eventually adopted as part of the South London Waste Plan will supersede any borough-level policies which still exist within the partner borough's Unitary Development Plans (UDPs). Table 4.3 identifies the existing borough policies which the policies of the South London Waste Plan will replace.

**Table 4.3: UDP Policies Superseded by South London Waste Plan Policies**

Borough	Policy Reference	Policy Description
<b>Croydon</b>	<b>SP11:</b> Opportunities for waste management facilities	Strategic policy
<b>Croydon</b>	<b>EP8:</b> Waste and recycling	Strategic policy governing the location of waste

		management facilities
<b>Croydon</b>	<b>EP9:</b> Waste and recycling	Safeguarding against loss of existing waste management facilities
<b>Croydon</b>	<b>UD15:</b> Design policy	Provision of storage infrastructure for recyclables, to enable recycling collections.
<b>Kingston</b>	<b>MW1:</b> Development of Waste Management Facilities	Strategic policy governing the location of waste management facilities
<b>Merton</b>	<b>PE9:</b> Waste Minimisation and Waste Disposal	Requires major new industrial developments to minimise waste
<b>Merton</b>	<b>PE11:</b> Recycling points	Provision of storage infrastructure for recyclables, to enable recycling collections.
<b>Sutton</b>	<b>PNR20:</b> Sites for waste related development	Policy identifying the location of waste management facilities

### Delivery and Monitoring of Policies

4.9. The implementation of the policies within the South London Waste Plan will require partner boroughs to work with a range of partners to deliver appropriate waste management facilities within the plan area. Key partners in the delivery of the South London Waste Plan are the waste management industry, the South London Waste Partnership and the Environment Agency. The waste management industry has a critical role in bringing forward applications and the construction and operation of local waste management facilities. The South London Waste Partnership is responsible for procuring contracts to treat the partner

boroughs' municipal waste and for implementing waste minimisation strategies. The Environment Agency is responsible for awarding permits to waste management facilities.

4.10. The monitoring of the South London Waste Plan will take place via each borough's Annual Monitoring Report. Much of the data required for the monitoring function is available either from the Environment Agency or from the boroughs' monitoring of their own planning permissions, refusals or applications. The boroughs intend to monitor policy performance from when the document is adopted. However, due to the current volatility both in terms of the throughput of waste management facilities and the number of waste applications for waste management coming forward, the boroughs will only draw conclusions on policy performance on the basis of three-year rolling averages. The approach is designed to mitigate against exceptional monitoring returns in one year.

**Table 4.4:** Schedule of Policies

<p><b><u>STRATEGIC WASTE POLICIES</u></b></p> <p><b>WP1:</b> Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste</p> <p><b>WP2:</b> Strategic Approach to Other Forms of Waste</p> <ul style="list-style-type: none"> <li>(a) Construction and Demolition Waste</li> <li>(b) Hazardous Waste</li> <li>(c) Agricultural Waste</li> <li>(d) Clinical Waste</li> <li>(e) Radioactive Waste</li> <li>(f) Waste Water</li> </ul> <p><b><u>SITE LOCATION WASTE POLICIES</u></b></p> <p><b>WP3:</b> Existing Waste Management Sites</p>
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<p><b>WP4:</b> Allocated Sites for Waste Management Facility Development and Areas of Opportunity for Waste Management Facility Development</p> <p><b>WP5:</b> Unallocated Sites for Waste Management Facility Development</p> <p><b><u>DETAILED WASTE POLICIES</u></b></p> <p><b>WP6:</b> Sustainable Construction of Waste Management Facilities</p> <p><b>WP7:</b> Protecting and Enhancing Amenity</p> <p><b>WP8:</b> Sustainable Energy Recovery</p> <p><b>WP9:</b> Planning Obligations</p> <p><b><u>SCHEDULES</u></b></p> <p><b>SCHEDULE 1:</b> Existing Waste Management Facilities</p> <p><b>SCHEDULE 2:</b> New sites allocated for Waste Management Facilities</p> <p><b>SCHEDULE 4:</b> Information Likely to be required for a Planning Application</p> <p><b>SCHEDULE 5:</b> Detailed site schedules</p>
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**STRATEGIC PLANNING WASTE POLICIES**

**WP1: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste**

**Additional Waste Capacity**  
 PPS10 "Planning for Sustainable Waste Management" (para 17) requires that the South London Waste Plan identifies sites and areas suitable for the waste management facilities that support the apportionment for Municipal Solid Waste and Commercial and Industrial Waste as set out in the relevant Regional Spatial Strategy (RSS); in this case the London Plan (2008).



The apportionment is a quantity (tonnes per annum) of Municipal Solid Waste and Commercial and Industrial Waste which the London Plan has allocated to each London borough. The apportionment is *not* a measure of the amount of waste arising in a borough *but* a share of the capital's total waste which each of London's 33 boroughs must manage. The apportionment is calculated according to each borough's ability to manage waste and some boroughs have been found to have a greater capacity to manage waste than others (mainly due to the availability of suitable land). Therefore, boroughs must allocate enough land to meet the apportionment figure, as stated the London Plan, *even if* some waste generated within a plan area is treated outside the area.

Table 4.4 shows the apportionment for the four boroughs of the South London Waste Plan.

It should be noted that, at the time of writing, the London Plan is being updated. New, lower apportionments have been identified in the *Draft Replacement London Plan* (Minor Alteration to the Draft Replacement London Plan issued in December 2009).

The apportionments in the Draft Replacement London Plan are lower because it is assumed that less waste will be produced in London over the next 10-15 years than previously anticipated.

Although boroughs are permitted to use new data where it arises, it is the partner boroughs' view that the apportionment identified in the Draft Replacement London Plan for commercial and industrial waste is too *low*. The employment projections upon which this figure is based are considered unambitious for this economically successful sub-region of London. In response, higher employment projections have been submitted to the Examination in Public for the Draft Replacement London Plan by the South London Partnership.

This matter will be clarified in late 2010, when the results of a London-wide commercial and industrial waste survey will be reported. The GLA anticipates the survey results will support their lower waste apportionments for this sector. However, until such a time as the evidence confirms these lower figures, the South London Waste Plan is based upon the *Adopted* London Plan apportionments. It is anticipated that this aspect of the

**Table 4.4: Adopted London Plan Apportionments**

Borough	Percentage of London total waste	Municipal Solid Waste (tpa) at 2020	Commercial & Industrial (tpa) at 2020	Total waste to manage at 2020
<b>Croydon</b>	3.0%	138,000	255,000	393,000
<b>Kingston</b>	2.0%	90,000	166,000	256,000
<b>Merton</b>	2.9%	131,000	243,000	373,000
<b>Sutton</b>	2.4%	108,000	201,000	310,000
<b>Waste Plan Area Total</b>	10.3%	467,000	865,000	1,332,000
<b>Greater London Area</b>	100%	4,550,000	8,436,000	12,987,000

Source: *The Adopted London Plan (2008)*

South London Waste Plan will be reviewed (in order to take account of the new survey data) when the Waste Plan is submitted to the Secretary of State.

### **Identifying land take**

For land use planning purposes, the additional waste management capacity identified must be translated into an area of land. This enables sufficient land to be allocated to enable the development of enough new and/or enhanced waste management facilities to meet the additional waste management capacity needs.

‘Key Issue 3: What number and range of waste facilities are needed?’ which features earlier within this document provides an overview of how the land take need has been calculated from the apportionment figure. Furthermore, the Technical Report (Evidence Base Study 4) details the rationale for calculations made.

To summarise; the South London Waste Plan must safeguard existing waste sites and identify 6 additional hectares of new sites (not already in waste management) in order to meet the Adopted London Plan apportionment, plus an additional 1 hectare to strive to meet the equivalent of 100% of the Waste Plan area’s waste arisings.

Given the scarcity of land available to businesses and industry, it is considered critical that the South London Waste Plan does not facilitate the over provision of waste management facilities. Key Issue 6 (scarcity of available land) described earlier within this Plan identifies that

demand for industrial land for businesses exceeds supply within the South London Waste Plan area. In order to safeguard land for a wide range of economic activity, it is critical that proposals for waste management development are related directly to the plan area’s *need* for waste management facilities. To facilitate our understanding of this, the additional waste management capacity required to meet the plan area’s need has been thoroughly examined in the accompanying ‘Evidence Base Study 4: The Technical Report’ and will be updated annually through boroughs’ Annual Monitoring Reports.

### **Facilities Required**

A key planning objective of PPS10 (paragraph 3) is to require local authorities to deliver planning strategies which drive waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for. Policy WP1 reflects this, by requiring the development of waste management facilities to be in accordance with the waste hierarchy and which require developers to ensure waste is managed as high up the waste hierarchy as possible. Table 3.1 within this South London Waste Plan provides a summary of existing and emerging waste technologies.

Therefore, in accordance with PPS10, the Draft Replacement London Plan and Plan Objectives 1, 2, 3 and 6:

**WP1: STRATEGIC APPROACH TO MUNICIPAL SOLID WASTE AND**

## COMMERCIAL AND INDUSTRIAL WASTE

The boroughs of the South London Waste Plan will work with the waste management industry to monitor the need and opportunity for sites. Proposals will be required to meet the apportionment requirements of the London Plan and any subsequent target. During the lifetime of the plan, the boroughs will seek to exceed the apportionment target and strive to attain self-sufficiency in managing the waste generated by the four boroughs. The requirements of the Waste Plan area are therefore to provide sufficient capacity to manage:

- a minimum of 1,133,000 tonnes of waste by 2015 to meet the Adopted London Plan apportionment and strive to provide 1,279,000 tonnes of capacity in total to meet our waste management needs.
- a minimum of 1,332,000 tonnes of waste by 2021 to meet the apportionment and strive to provide 1,371,000 tonnes of capacity in total to meet our waste management needs.

The partner boroughs of Croydon, Kingston, Merton and Sutton will deliver this by safeguarding existing capacity and encouraging intensification of sites where this meets all other policy requirements of the Waste Plan (Policy WP3).

Development to meet the additional capacity needs will be within the industrial areas identified in Policy WP4, provided they meet the other policies within this South London Waste Plan and relevant

policies from the appropriate borough's Development Plan.

Development for additional capacity will be permitted which seeks to reduce net carbon emissions by managing waste as high up the waste hierarchy as practically possible, whilst safeguarding communities and the environment by meeting the other policies within the relevant borough's Development Plan.

The additional waste management capacity needed throughout the plan period will be monitored on a yearly basis through each borough's Annual Monitoring Report.

### MONITORING FRAMEWORK FOR POLICY WP1

Monitoring Indicators	Monitoring Targets
<p><b>(1)</b> The number, site area (ha) and annual capacity (tonnes) of existing and new licensed waste facilities for Municipal Solid Waste and Commercial and Industrial Waste <i>Source: EA licence data and Local Authority planning consents</i></p>	<p><b>(1)</b> To meet the Draft Replacement London Plan apportionment figures, for the four boroughs combined, for Municipal Solid Waste and Commercial and Industrial Waste</p>
<p><b>(2)</b> Proportion of Municipal Solid Waste arisings recycled or composted <i>Source: DEFRA Annual Waste Statistics</i></p>	
<p><b>(3)</b> Proportion of</p>	<p><b>(2)</b> To recycle/compost Municipal Solid Waste: 2015: 45% by 2015 (London</p>

<p>Commercial and Industrial Waste arisings recycled or composted, Source: EA, where data is available</p> <p><b>(4)</b> Forecasts for waste arisings, by Municipal Solid Waste and Commercial and Industrial Waste <i>Source: the South London Waste Partnership and the GLA</i></p>	<p>Plan target) 2020: 50% by 2020 (borough target)</p> <p><b>(3)</b> To recycle/compost 70% of Commercial and Industrial Waste by 2020 (London Plan target)</p> <p><b>(4)</b> To achieve self-sufficiency for the four boroughs in terms of Municipal Solid Waste and Commercial and Industrial Waste by 2021</p>
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95% of the capital's Construction, Demolition and Excavation Waste is recycled and reused by 2020 and the Department for Business, Enterprise and Regulatory Reform's Strategy for Sustainable Construction (June 2008) requires a 50% reduction in the amount of Construction, Demolition and Excavation Waste going to landfill by 2012 compared to 2008.

To meet the regional policy, Policy WP6 of this plan encourages the on-site recycling of this waste stream to help meet the recycling target of 95%. For any waste that cannot be recycled, the plan area has a landfill site which is licensed for the lifetime of the plan at Beddington Farmlands, Sutton. All existing sites within the plan area which already contribute to the management of this waste stream are safeguarded under Proposed Policy WP3.

**WP2: Strategic Approach to Other Forms of Waste**

**Construction, Demolition and Excavation Waste**

Data for this waste stream is only available for London as a region. Borough level data is not available. The most recent data from 2005 estimates that of the 8 million tonnes of Construction, Demolition and Excavation Waste produced in the capital, almost 5 million tonnes was recycled, 2 million tonnes was spread on registered exempt sites and only 1 million tonnes was disposed of at landfill.

Nevertheless, Draft Replacement London Plan Policy 5.16 requires that more than

It is therefore not anticipated that additional capacity will be needed within the plan area to treat Construction, Demolition and Excavation Waste. However, should arisings increase in future, there is flexibility built into the plan through allowing for the provision of unallocated sites. Any application for a new waste management facility that manages Construction, Demolition and Excavation Waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

**Hazardous Waste**

The definition of hazardous waste includes substances that are commonly

found in the Municipal Solid Waste, Commercial and Industrial (eg waste electronic and electrical equipment) and Construction, Demolition and Excavation (eg asbestos and contaminated soils) waste streams. Hazardous wastes are routinely separated from these waste streams for specialist treatment.

The amount of hazardous waste produced within the plan area is small (16,000 tonnes in 2006) and recent trends show an overall decline in this waste stream since 1999. It is not anticipated that additional capacity will be needed within the plan area to treat hazardous waste. However, should arisings increase in future, there is flexibility built into the Waste Plan through allowing for the provision of unallocated sites. Any application for a new waste management facility that treats hazardous waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

### **Agricultural Waste**

The most recent Environment Agency data on agricultural waste (waste and by-products arising on farms consisting of organic matter such as manure, slurry, silage, effluent, crop residues and non-organic materials) shows that only 35,000 tonnes of agricultural waste was produced in London. There is no borough level data available, though the amount of agricultural waste produced within the plan area is anticipated to be negligible. The majority of biodegradable waste produced is composted and used on the land and other agricultural waste is treated as any

other commercial or industrial waste, collected and treated by private contractors. By safeguarding the existing waste management facilities in the borough through Policy WP3, any agricultural waste arising within the borough can continue to be transferred and/or treated in the current manner.

It is not anticipated that additional capacity will be needed within the plan area to treat agricultural waste. However, should arisings increase in future, there is flexibility built into the plan through allowing for the provision of unallocated sites. Any application for a new waste management facility that treats agricultural waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

### **Clinical Waste**

The responsibility for the appropriate disposal of clinical/hazardous waste falls to the producer of the waste as per definition in the Environmental Protection Act 1990 section 34 Duty of Care: "anyone whose activity produces waste, or anyone who carries out pre-processing, mixing or other operations resulting in the change in the nature of composition of this waste." Producers can be identified as, but not limited to, the following: Acute and Foundation Trusts, local healthcare providers, Ambulance Trusts, Mental Health Trusts, veterinary practices, dentistry, opticians, podiatry, general practices, pharmacies, residential homes with and without nursing care, research facilities, private and independent



healthcare, other non-health practices producing healthcare waste (eg: tattooists and body piercers), complementary and alternative treatments and voluntary organisations.

Each organisation or individual has a responsibility to ensure the safe disposal of clinical/hazardous waste produced as a result of their activity. The arrangements for this disposal must comply with the Environmental Protection Act 1990 inclusive of the Duty of Care Regulations 1990. Local policies and procedures, such as Infection Control Policies and Waste Management Policies, will further develop the assurance of compliant disposal of waste and allocate the appropriate risk thus determining the method of disposal. (Health Technical Memorandum 07-01: Safe management of healthcare waste).

Local arrangements may vary however. For the majority, an Environment Agency authorised contractor is used to ensure waste is transported and disposed of adequately. In the plan area, local healthcare providers use a third party contractor for the above purpose with management facilitated by the Support Services Partnership SW London (hosted by NHS Wandsworth). Acute and Foundation Trusts within the area have similar arrangements. Local authorities have an obligation to dispose of clinical waste generated by the community but have no obligation to transport it to a disposal facility. The Environmental Protection Regulations 1991 empowers the local authority to charge a reasonable fee for the transport of this waste. This charge may include administrative fees in

accordance with the Duty of Care Regulations 1991.

At present, healthcare waste is transported to disposal facilities outside the south west and south east London, although this is dependent on the authorised contractor utilised. Some waste arisings may be transported temporarily to transfer stations prior to the final disposal facility. This is done simply for operational reasons and to manage capacities appropriately. As such, it is considered that the capacity for the safe disposal of clinical/hazardous waste is sufficient. However, any application for a new waste management facility that treats clinical waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan and subject to scrutiny, approval and permitting by the Environment Agency.

### **Radioactive Waste**

Radioactive waste is a waste stream that generates particular concerns. Waste containing radioactive material is usually the product of a nuclear process, such as nuclear fission, though industries not directly connected to the nuclear power industry, such as hospitals and laboratories may also produce radioactive waste. Radioactive waste requires treatment in specialist facilities. Existing European legislation covers radioactive waste and sets out the standards for the health protection of the general public and workers against the dangers of ionising radiation. The Radioactive Substances Act 1993 consolidates earlier provisions. It

provides that “no person may keep or use radioactive material on premises used by that person for carrying on an undertaking without registration unless exempted from registration”. Control is exercised by the Environment Agency, under consultation with the Department for Environment, Food & Rural Affairs (DEFRA) and the Health and Safety Executive (HSE).

The Environment Agency holds no borough level data on the occurrence of radioactive waste. However, since there are no nuclear power plants within the partner boroughs, it is not expected that this waste occurs in any significant volumes within the plan area. Therefore, the South London Waste Plan will not make any provisions for this waste stream.

### **Waste Water**

The four boroughs of the South London Waste Plan are served by a number of sewage treatment works, including Beddington, Hogsmill, Crossness and Longreach. However, only Beddington (Sutton) and Hogsmill (Kingston) Sewage Treatment Works are located within the plan area whereas the others fall outside.

The adopted Sutton Core Strategy makes reference to the need to increase treatment capacity to serve additional catchment growth at the Beddington Sewage Treatment Works and the Kingston Core Strategy (Preferred Options) proposes to designate Hogsmill Sewage Treatment Works as a Major Developed Site within the Green Belt to facilitate expansion and improvement to the works to cope with new development within its catchment area.

As the Landfill Directive has introduced a ban on the disposal of liquids to landfill facilities, this may result in additional pressure to find available space within operational sewage treatment works to manage liquid wastes that were previously disposed of through landfill. Any application for a new liquid waste management facility will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough’s Development Plan.

Therefore, in accordance with European and National legislation, and Plan Objectives 1, 2 and 3:

### **WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE**

Planning permission for additional facilities for Construction, Demolition and Excavation Waste, Hazardous Waste, Agricultural Waste, Clinical Waste, Radioactive Waste and Waste Water will be permitted, provided that:

- (a)** there is an identified need for such a facility within the South London Waste Plan area, which cannot be met through existing waste management facilities or the adaptation of existing waste management facilities; and,
- (b)** the proposals meet the other policies of this South London Waste plan together with all other relevant policies of the appropriate borough’s

Development Plan.

<b>MONITORING FRAMEWORK FOR POLICY WP2</b>	
<b>Monitoring Indicators</b>	<b>Monitoring Targets</b>
<p><b>(1)</b> The number, site area (ha) and annual capacity (tonnes) of existing and new licensed waste facilities for other waste streams <i>Source: EA licence data and Local Authority planning consents</i></p>	<p><b>(1)</b> To recycle and re-use 95% of Construction, Demolition and Excavation Waste within London by 2020 (London Plan target)</p> <p><b>(2)</b> To reduce by 50% the amount of Construction, Demolition and Excavation Waste going to landfill in 2012 compared to 2008 (National target)</p>

Schedule 1 identifies the likely timescale for their re-development. For these sites also, a site plan in Schedule 5 provides a more detailed description of the site.

London Plan Policy 4A.24 and Draft Replacement London Plan Policy 5.17 both seek to protect existing waste sites. Existing sites have established waste uses and contribute to the existing waste management capacity within the plan area. The loss of these sites would decrease the existing level of waste management capacity within the plan area, resulting in the need for more new sites to meet the Waste Plan's objective of self-sufficiency. In recognition of this, London Plan Policy 4A.24 and Draft Replacement London Plan Policy 5.17 state that if, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required normally meeting the maximum throughput that the site could have achieved.

## **SITE LOCATION WASTE POLICIES**

### **WP3: Existing Waste Management Sites**

The loss of appropriate sites to other development will make waste, recycling, diversion and recovery targets harder to achieve. Therefore, national and regional policy recognises local authorities have a responsibility to safeguard existing waste sites and allocate appropriate sites for the development of new and/or enhanced future waste management facilities. Schedule 1 identifies existing waste management sites within the plan area. Where development is anticipated,

In addition, London Plan Policy 4A.24 and Draft Replacement London Plan Policy 5.17 both require the safeguarding of existing landfill sites. The plan area has one landfill site at Beddington (Sutton) and this is licensed for the lifetime of this plan. It is included in Schedule 1 which is a list of sites to be safeguarded and which accompanies this policy.

Therefore, in accordance with London Plan Policy 4A.24, Draft Replacement London Plan Policy 5.17 and Plan Objectives 1, 3, 4 and 7:

### WP3: EXISTING WASTE MANAGEMENT SITES

Existing waste management sites, as set out in Schedule 1, will be protected. These sites will be encouraged to maximise their potential, provided that proposals satisfy all other policy requirements of this South London Waste Plan. Proposals must also satisfy any other relevant policies within the applicable borough's Development Plan.

If, for any reason, an existing waste management site is lost to a non-waste use, replacement compensatory site provision will be required that, as a minimum, meets the maximum throughput that the site could have achieved. The compensatory site will need to comply with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

In accordance with the objectives of the and Policy SWP1, if a redevelopment results in waste being treated up in the waste hierarchy but leads to a reduction in overall throughput, permission may also be granted.

### Schedule 1: Existing Licensed Waste Management Sites in the Waste Plan Area, as protected by the Mayor's London Plan

Site ref	Site name	Borough	Likely timescale for development of the site, where known
<b>Metal Recycling Facilities</b>			
	Croydon Car Spares Ltd	Croydon	
22	B Nebbett & Son	Merton	
23	5 Star Japanese Autospares Ltd	Merton	
100	European Metal Recycling Ltd	Sutton	
24	E & S B Davis, Bishops Place, Sutton	Sutton	
<b>Household waste and recycling sites</b>			
2	Fishers Farm HRRC	Croydon	
4	Purley Oaks HRRC	Croydon	
26	Weir Road HRRC	Merton	
3	Kimpton Road HRRC	Sutton	
<b>Sites hosting household waste and recycling sites and borough transfer stations</b>			
1	Factory Lane Transfer Station	Croydon	2011-2016
6	Villiers Road HRRC	Kingston	2011-2016
9	Garth Road HRRC	Merton	2011-2016
<b>Physical treatment facilities</b>			
-	Vertal	Merton	
21	777 Recycling Centre, Coomber Way, Beddington, Sutton*	Sutton	

18	Recycling and composting centre Beddington*	Sutton	2011-2016
<b>Waste transfer sites</b>			
	Safety Kleen, Unit B6	Croydon	
	Croydon Transfer Station	Sutton	
20	Greener Solutions Unit 3 & 4 Boundary Bus. Court	Merton	
114	Curley Skip Hire	Croydon	
5	Pear Tree Farm waste transfer station	Croydon	
7	Henry Woods Waste Management Ltd	Merton	
25	Sloane Demolition	Merton	
96	George Killoughery Ltd	Merton	
126	Benedict Wharf Transfer Station (also a small MRF on site)	Merton	2011-2016
	S E Skips Ltd, Willow Lane,	Merton	
27	SITA transfer station, Weir Road	Merton	2011-2016
17	Country Skip Hire	Sutton	2011-2016
98	Veolia transfer station, Stubbs Mead Depot	Sutton	
97	Sevenside Waste Paper, Beddington Lane	Sutton	
87	Bardon Aggregates, Coomber Way	Sutton	

Other waste facilities			
	Landfill facility at Beddington*	Sutton	

**Source:** *The Environment Agency (June 2010)*

\* All facilities on Beddington Farmlands have temporary permissions only. All are due to expire in 2023, just beyond the initial lifetime of this Plan. After this, the land will be incorporated into the Wandle Valley Regional Park.

*Location Map of existing sites to be added to the final document*

MONITORING FRAMEWORK FOR POLICY WP3	
Monitoring Indicators	Monitoring Targets
(1) The number, site area (ha) and annual capacity (tonnes) of existing licensed waste facilities for other waste streams <i>Source: EA licence data</i>	(1) Number of existing waste management sites, set out in Schedule 1, not to decrease over the plan period  (2) The site area of all existing waste management sites, set out in Schedule 1, not to decrease over the plan period  (3) The annual capacity of existing waste management sites, set out in Schedule 1, not to decrease over the plan period



#### **WP4: New Sites Allocated for Waste Management Facilities**

Planning Policy Statement 10 “Planning for Sustainable Waste Management” requires the South London Waste Plan to identify sites and areas suitable for new or enhanced waste management facilities, in accordance with the broad locations identified in the Mayor’s London Plan.

London Plan Policy 4A.27 and Draft Replacement London Plan Policy 5.17 identify the broad locations suitable for recycling and waste treatment facilities as strategic industrial locations, local employment areas and existing waste management sites. These categories formed the area of search for sites at the start of the development of the South London Waste Plan in 2008. Additional sites were also identified through the 2008 and 2009 consultations.

PPS10 (Annex E), London Plan Policy 4.23 and Draft Replacement London Plan Policy 5.17 also set out locational criteria for waste management facilities. Following the Issues and Options Consultation on this document, around 140 sites were identified and these were evaluated on the basis of a number of criteria, primarily derived from PPS10 and the London Plan but also adapted to take into account specific characteristics of the plan area.

The site evaluation process comprised three elements: absolute constraints (or “showstoppers”), constraints / opportunities and site assessment. The absolute constraints were identified as: Sites of Special Scientific Interest,

Special Areas of Conservation, Special Protection Areas, Ramsar Sites, National Nature Reserves, World Heritage Sites, Scheduled Ancient Monuments, Conservation Areas, Listed Buildings, Registered Historic Battlefields, Registered Parks and Gardens, greenfield sites located within Flood Zone 3b and sites of less than 0.9 hectares in area.

The constraints were identified as: Green Belt or Metropolitan Open Land, Open Space, Flooding, Groundwater Source Protection Zones, Public Rights of Way, Local Conservation Areas, Nature Conservation Areas, Locally Important Nature Conservation Areas, Archaeology and Strategic Views. The opportunities included: Major Developments / Regeneration Sites, Sustainable Transport and the Road Network.

The Site Assessment comprised: Site Configuration, Existing Uses/Buildings on Site, Proximity to Residential Areas, School and Hospitals, Routing of Vehicles to Site, Visual Intrusion, Existing Ambient Air Quality, Traffic Generation and Co-Location Potential. The accompanying Potential Sites Technical Report (July 2009) on the site selection process provides further details of how the sites were evaluated.

In addition to the site evaluation, other factors were also considered such as responses to earlier consultations, further evidence gathering and the likelihood of deliverability. Additional evidence, which is available in the supporting documents, includes the evaluation of sites against the sequential test in Planning Policy

Statement 25: “Development and Flood Risk”, a consideration of the environmental impacts which the development of a site could cause and the Sustainability Appraisal. In addition, all the potential sites were evaluated for deliverability based on the criteria of:

- Suitability – whether there are constraints which would make development inappropriate
- Availability – whether there are any ownership limitations to development
- Achievability – whether there are any financial or other limitations to development

The sites allocated in this policy, and listed in Schedule 2, result from the site evaluation, consultation and further consideration in light of the findings within the additional evidence compiled. They are the sites which are considered most deliverable for the development of new and/or enhanced future waste management facilities. The total area of these sites meets the landtake requirement set out in Policy SWP1 of this document.

The sites have been identified on the basis of their general suitability, availability and achievability and not with a particular type of waste management facility specified. Therefore, although the sites are allocated, proposals will still need to meet all policies within this South London Waste Plan together with any other relevant policies of the appropriate borough’s Development Plan.

### **Allocating broader areas**

As noted previously, the plan area’s industrial and employment land is in high demand compared to many other regions of London. The competition for land in the industrial areas is illustrated by the Deliverability of Sites Report (Evidence Base Study 3) where a large number of potential sites were identified as “unavailable” during the initial lifetime of this Plan. The poor availability of industrial sites means that insufficient sites are identified to accommodate the equivalent of 100% of waste arisings, which is what the South London Waste Plan strives for. Therefore, the additional seven hectares of land needed has been allocated areas from wider industrial areas.

These industrial areas are locations which currently have deliverability constraints (often relating to land ownership and the constraints of land assembly) but, in the borough’s view, are the most suitable areas for waste management facilities. These areas are intended to signal to potential waste management facility developers where the boroughs could envisage further waste management facility development. The allocation of seven additional (unspecified) hectares from amongst these sites builds flexibility into the plan for the longer term.

Therefore, in accordance with PPS10, London Plan Policies 4A.23 and 4A.27, Draft Replacement London Plan Policy 5.17 and Plan Objectives 1, 3, 4 and 6:

#### WP4: NEW SITES FOR WASTE MANAGEMENT FACILITIES

##### Allocated Sites

Planning permissions will be granted for waste management facilities on land from within the industrial estates identified in Schedule 2 in order to provide sufficient waste management facilities to meet the Waste Plan's capacity needs, identified in Policy WP1.

Proposals must satisfy all other policy requirements of this South London Waste Plan. Proposals must also satisfy any other relevant policies within the applicable borough's Development Plan.

702	Garth Road Industrial Area	Merton	2017-2021
69	Willow Lane Industrial Area	Merton	2017-2021
1006	The Wandle Valley Trading Estate (part of)	Sutton	2011-2016
491	Kimpton Industrial Estate, Land north of Minden Road	Sutton	2017-2021
5312/532/533/534/535/539	Beddington Industrial Area	Sutton	2017-2021

#### Schedule 2: Industrial areas with sites suitable for waste management

Waste management development will be permitted on up to a total of **seven hectares** of land on a single or multiple sites within the following industrial areas:

Site ref	Site Description	Borough	Likely timescale for development of the site
102	Purley Way, Lysander Road and Imperial Way Industrial Area	Croydon	2017-2021
105	Factory Lane Industrial Estate	Croydon	2017-2021
125	Croydon Factory Lane (South Side)	Croydon	2017-2021
99	Croydon Purley Oaks Highway Depot	Croydon	2017-2021
351/352/353	Chessington Industrial Area	Kingston	2017-2021
641/642/651	Durnsford Road / Plough Lane Industrial Area	Merton	2017-2021

#### MONITORING FRAMEWORK FOR POLICY WP4

Monitoring Indicators	Monitoring Targets
<p>(1) The number, site area (ha) and annual capacity (tonnes) of new licensed waste facilities for all waste streams over the plan period <i>Source: EA licence data</i></p>	<p>(1) All the allocated waste management sites, set out in Schedule 2, to become operational during the plan period</p> <p>(2) A total of seven hectares of land in the industrial areas, set out in Part B of Schedule 2, to become operational during the plan period</p>

*Location map of industrial areas to be added to the final document.*

#### WP5: Unallocated Sites for Waste Management Facility Development

Proposals for waste management development might come forward on sites which are not allocated in this plan and are not in the areas of opportunity. When this occurs, development must be related to need, as identified in Policy WP1 and

must be appropriate to the site in question.

Planning Policy Statement 10 “Planning for Sustainable Waste Management” (Annex E), London Plan Policy 4A.23 and Draft Replacement London Plan Policy 5.17 identify a wide range of factors which need consideration when locating waste management facilities. Together, these factors aim to deliver the key planning objectives of PPS10 (para 3) which require planning authorities to deliver a strategy which helps secure the recovery or disposal of waste without endangering human health, without harming the environment and which protect green belts, but recognises the particular locational needs of some types of waste management facilities. The requirements of PPS10 (Annex E) and Policy 4A.23 of the London Plan were used in the process of allocating sites and also form the basis of assessing the suitability of unallocated sites.

An objective site selection process was carried out to identify the allocated sites and these are considered to be the most suitable sites for the development of new/enhanced waste facilities and the partner boroughs of the South London Waste Plan are seeking development on these sites before other sites are considered. Policy WP5 therefore requires developers to consider if the sites identified in Policy WP4 are available and achievable and then consider the areas in Policy WP4 before proposing unallocated sites.

Therefore, in accordance with PPS10, London Plan Policies 4A.23 and 4A.27, Draft Replacement London Plan Policy 5.17 and Plan Objectives 1, 3, 4 and 6:

#### **WP5: UNALLOCATED SITES FOR WASTE MANAGEMENT FACILITY DEVELOPMENT**

Proposals for waste facilities on unallocated sites will be considered and planning permission granted, provided the proposed development meets all of the following criteria:

- (a)** It can be demonstrated that the proposed facility is not deliverable on one of the Allocated Sites or in one of the Industrial Areas identified in Policy WP4;
- (b)** It can be demonstrated that there is a need for the development, in accordance with Policy WP1;
- (c)** The other policies of the relevant borough’s Development Plan are met; and,
- (d)** The following locational criteria are met:
  - (i)** The site is not within, or will have an adverse effect on, nature conservation areas protected by international and national regulations;
  - (ii)** The site does not contain features, or will have an adverse effect on features, identified as being of international and national historic importance; and,
  - (iii)** The site has no adverse effect on on-site or off-site flood risk, meets the Sequential Test for flood risk as set out in Planning Policy Statement 25 “Development and Flood Risk” and, where appropriate, the criteria for the PPS25 Exception Test. Proposals involving hazardous waste will not be permitted with Flood Zones 3a

or 3b.

Priority will be given to sites which:

- are designated by the Waste Plan area's local authorities as suitable for industrial development in the planning policy documents or within extensive areas of despoiled, contaminated, previously developed or derelict land or areas with a history of a waste-related use other than restored landfill or to be restored landfill;
- do not adversely affect the openness of strategic open land (eg the Green Belt and Metropolitan Open Land);
- are located more than 100 metres or more from open space;
- are identified as having a low risk of flooding;
- are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
- 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;
- have direct access to the strategic road network;
- have no Public Rights of Way;
- do not adversely affect local conservation areas, nature conservation areas, locally important conservation areas, archaeological sites or strategic views;
- are close to existing or planned decentralised energy networks, potential users of combined heat and power (and combined cooling heat and power) and areas of growth, regeneration and mixed-use development; and,
- offer opportunities to accommodate various related facilities on a single site.

Indicators	Targets
<p><b>(1)</b> The number, site area (ha) and annual capacity (tonnes) of new licensed waste facilities for all waste streams over the plan period <i>Source: EA licence data</i></p> <p><b>(2)</b> The number, site area (ha) and annual capacity (tonnes) of licensed waste facilities for all waste streams refused planning permission by reason over the plan period <i>Source: Borough monitoring</i></p>	Not Applicable

## DETAILED WASTE POLICIES

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

“Designing Waste Facilities – A Guide to Modern Design in Waste” (DEFRA and CABE<sup>15</sup>, 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?” London Plan Policy 4A.3 and

### MONITORING FRAMEWORK FOR POLICY WP5

Monitoring	Monitoring
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<sup>15</sup> Commission for Architecture and the Built Environment

Draft Replacement London Plan Policy 5.3 provide guidance on how to deal with the two aspects of climate change.

In terms of standards, the Building Research Establishment (BRE) has established a range of BREEAM<sup>16</sup> schemes for rating the overall environmental performance of different types of non-residential buildings. Buildings are rated on a scale of ‘Pass,’ ‘Good,’ ‘Very Good,’ ‘Excellent’ or ‘Outstanding.’ However, there is no specific BREEAM scheme for waste facilities since there are many different technologies and building types. However, BRE advice is that it will be for developers to liaise with the BRE and BRE-accredited assessors in order to identify a suitable ‘bespoke’ BREEAM scheme to suit the particular characteristics of the proposed development. It is considered by the boroughs that many waste facilities should be able to meet the ‘Excellent’ standard. However, if the facility is in a remote location or has high energy requirements for processing, it may only be able to achieve a lower rating. Similar standards should apply if the BREEAM is replaced by another environmental performance rating regime.

While, the reduction of carbon emissions is a key element of a BREEAM scheme, the London Plan and the Draft Replacement London Plan both also set out specific carbon emission reduction targets that developments should meet.

<sup>16</sup> Building Research Establishment Environmental Assessment Method (see [bream.org](http://bream.org))

Draft Replacement London Plan Policy 5.2 sets the following targets:

**Table 4.5:** Draft Replacement London Plan Policy 5.2 Carbon Emission Targets for Non-Domestic Buildings

Year	Improvement on 2006 Building Regulations
2010-2013	44 per cent
2013-2016	55 per cent
2016-2019	As per building regulations requirements
2019-2031	Zero Carbon

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 (e.g. for composting 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 allowing for the minimisation of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly. Storage and unoccupied areas may be better placed in the warmest areas of the facility.
- 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. In addition, facilities should incorporate improvements to flood risk management in support of the objectives of the Catchment Flood Management Plan (CFMP) and the partner boroughs' Strategic Flood Risk Assessments (SFRAs).

- **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.

Developers should therefore have regard to the London Plan, the Draft Replacement London Plan, DEFRA's "Designing Waste Facilities – A Guide to Modern Design in Waste" (2008), the Mayor of London's "Sustainable Design and Construction" SPG (2006) and other Local Development Framework guidance.

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.

Therefore in accordance with national and regional advice, Draft Replacement London Plan Policies 5.2 and 5.3 and Plan Objectives 2 and 4:



**WP6: SUSTAINABLE CONSTRUCTION OF WASTE FACILITIES**

All proposals must achieve a sustainability rating of ‘Excellent’ under a bespoke BREEAM 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 each of the ‘essential’ standards set out in the Mayor of London’s Sustainable Design and Construction SPG (or equivalent) together with all other policies within the South London Waste Plan and any other relevant policies of the appropriate borough’s Development Plan:

Waste management facilities will be required to:

- (a) minimise on-site carbon dioxide emissions in accordance with the standards set out in Table 3.5;
- (b) be fully adapted and resilient to the future impacts of climate change, particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/ heat waves, air pollution, drought conditions and impacts on biodiversity;
- (c) incorporate green roofs, sustainable urban drainage systems (SUDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in support of the objectives of the All London Green Grid; and,
- (d) make more efficient use of resources and reducing lifecycle impacts of construction materials
- (e) minimise waste and promote sustainable management of construction wastes on-site;
- (f) protect, manage and enhance local habitats and biodiversity.

<b>MONITORING FRAMEWORK FOR POLICY WP6</b>	
<b>Monitoring Indicators</b>	<b>Monitoring Targets</b>
(1) The number of permissions granted waste management facilities qualify the BREEAM “Excellent” standard over the plan period <i>Source: Borough monitoring</i>	(1) All permissions granted waste management facilities to qualify for the BREEAM “Excellent” standard

**WP7: Protecting and Enhancing Amenity**

Planning Policy Statement<sup>10</sup> “Planning for Sustainable Waste Management” states that, “in considering planning applications for waste management facilities, waste planning authorities should consider the likely impact on the local environment and on amenity.” These can also be concerns of the pollution control authorities and these should be consistency between consents issued under the planning pollution control regimes.” Consequently, in the consideration of waste management 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 the proposal.

Waste management 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.

Developers are advised to pay particular attention to how the design of a facility can mitigate amenity issues. For instance, waste management activities impacting on local amenity 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. "Rubbish In – Resources Out: Design Ideas for Waste facilities in London" (GLA, 2008) and "Designing Waste Facilities: A Guide to Modern Design in Waste (Defra/CABE, 2008) provide useful guidance. Therefore, in accordance with PPS10 and Plan Objectives 1, 2, 4, and 5:

#### **WP7: PROTECTING AND ENHANCING AMENITY**

Developments for waste management facilities will be required to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.

A waste management facility should be within a fully enclosed covered building.

Particular regard will be paid to the impact of the development in terms of:

- (a)** Green Belt, Metropolitan Open Land, recreation land or similar;
- (b)** Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations;
- (c)** Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
- (d)** Ground water, surface water and watercourses;
- (e)** Air emissions arising from the plant and traffic generated;
- (f)** Noise and vibration from the plant and traffic generated;
- (g)** Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network
- (h)** Odour, litter, vermin and birds; and
- (i)** The design of the waste management 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 Schedule 4 will provide the basis for the assessment of the impact of a development.

**Schedule 3: Information which may be required for a Planning Application**

No	Information which may be to be required
1	Type(s) of waste to be managed at the site
2	Estimated annual throughput of waste materials and timescale of operations
3	Estimated capacity of the site
4	Method of working
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	Anticipated employment levels and hours of operation
9	Statement of Community Involvement
10	Preliminary assessment of BREEAM standard, undertaken by a BRE accredited assessor and 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 CO <sub>2</sub> 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 effect conservation areas such as a National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Importance for Nature Conservation, Site of Metropolitan, Borough or Local Importance 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. The AQ impact assessment should be carried out in accordance with "London Councils – Air Quality and Planning Guidance" and the significance of the AQ impact should be assessed using the methodology in that document
23	An assessment which identifies potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, and which identifies the mitigation measures to be used to minimise the effects of those nuisances.
24	Noise Impact Assessment
25	Sustainability Statement
26	TV and Radio Reception Impact Assessment
27	Measures to prevent new or increased risk to aviation from the proposed development
28	Measures for protecting Public Rights of Way
29	Transport Assessment
30	Travel Plan
31	Route Management Strategy
32	Access Strategy
33	Delivery Servicing Plan/Freight Plan
34	Construction Logistics Plan
35	Highway safety measures
36	Design and Access Statement
37	Restoration, after care, after use and long-term management provision
38	An Environmental Impact Assessment may also be required under the Town and country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
39	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; and, The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA).	
MONITORING FRAMEWORK FOR POLICY WP7	
Monitoring Indicators	Monitoring Targets
<p><b>(1)</b> Number of permissions granted for waste management facilities contrary to Environment Agency advice on air quality <i>Source: Borough monitoring</i></p> <p><b>(2)</b> Number of permissions granted for waste management facilities contrary to Environment Agency advice on either flood risk or water quality <i>Source: Borough monitoring</i></p> <p><b>(3)</b> Number of permissions granted for waste management facilities located in either Flood Zone 2 or Flood Zone 3a <i>Source: Borough monitoring</i></p> <p><b>(4)</b> Number of permissions granted for waste management facilities</p>	<p><b>(1), (2) and (3)</b> All new/redeveloped (post publication of the proposed submission version of the document) waste management facilities to be granted without Environment Agency objection</p> <p><b>(4)</b> All new/redeveloped (post publication of the proposed submission version of the document) waste management facilities to incorporate SUDS</p> <p><b>(5)</b> All new/redeveloped (post publication of the proposed submission version of the document)</p>

<p>incorporating SUDS or other climate change adaptation measures <i>Source: Borough monitoring</i></p> <p><b>(5)</b> Number of permissions granted for waste management facilities contrary to advice from statutory consultees (e.g. Natural England, Greater London Authority) <i>Source: Borough monitoring</i></p>	<p>waste management facilities not to receive an objection from a statutory consultee</p>
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#### **WP8: Sustainable Energy Recovery**

The 2008 Climate Change Act sets a legally binding target to cut UK emissions by 80% by 2050. In seeking to achieve this target, the UK Renewable Energy Strategy (DECC, July 2009) sets out a pathway generating 15% of the UK's energy from renewable sources by 2020 in line with the EU Renewable Energy Directive. The new Feed-In Tariffs introduced in April 2010 and the proposed Renewable Heat Incentive arising from the Energy Act 2008 will provide further incentives for the development of renewable energy generating capacity.

PPS1: "Delivering Sustainable Development" requires development to be planned to limit carbon dioxide emissions and to make good use of opportunities for decentralised and renewable production

of low carbon energy. The Supplement to PPS1: "Planning and Climate Change" (2007) identifies energy generation from waste as one of a number of renewable energy sources which will help to secure progress against the above objectives. In addition to reducing overall carbon dioxide emissions, waste to energy facilities also help to minimise greenhouse gas emissions from landfill sites by reducing the quantity of residual waste for disposal.

The Mayor has set targets to achieve an overall reduction in London's carbon dioxide emissions of 60% below 1990 levels with 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Within this context, the Mayor's draft Climate Change Mitigation and Energy Strategy (February 2010) recognises that one of the main opportunities for increasing renewable energy generation in London is from waste to energy technologies.

Accordingly, Policy 5.17 of the Draft Replacement London Plan supports developments that contribute towards renewable energy generation, in particular the use of technologies that produce a renewable gas, and developments for producing renewable energy from organic/biomass waste. Wherever possible, opportunities should be taken to provide combined heat and power (CHP) and combined cooling heat and power (CCHP).

Policy 5.8 supports and encourages the more widespread use of innovative energy technologies to reduce use of fossil fuels and carbon dioxide emissions. For waste

that cannot be recycled or composted (including anaerobic digestion), the Mayor has a preference for advanced conversion waste technologies such as gasification and pyrolysis. However it is expected that all proposed technologies recovering energy from non-recyclable waste should achieve at least a positive carbon outcome, whereby the direct emissions from the technology are offset by carbon dioxide emissions savings from the generation and distribution of heat and electricity to users.

Policy 5.5 prioritises the development of decentralised heating and cooling networks, including decentralised energy opportunities through the use of energy from waste technologies. Policy 5.6 requires that where future network opportunities are identified, proposals should be designed to connect to these networks. The Mayor has developed a London Heat Map tool to help boroughs and developers identify decentralised energy opportunities. as the basis for developing more detailed local energy masterplans. The London Development Agency's decentralised energy masterplanning support package (DEMaP) will assist the partner Boroughs of the South London Waste Plan to identify decentralised energy opportunity areas within the plan area based on the outcome of heat mapping and locally set targets for carbon reduction.

Although energy recovery facilities are likely to play an important role in the future management of waste arisings across the plan area and as a source of renewable heat and power, it is important to note that

thermal treatment with energy recovery is lower in the waste hierarchy than other waste management options. In line with Policy WP1 such proposals will be required to demonstrate that the waste cannot practically and reasonably be reused, recycled or processed to recover materials. This will ensure that the thermal treatment plant does not 'crowd out' the potential for recycling or otherwise gaining benefit from the waste prior to its thermal treatment.

All Boroughs are firmly against poor performing, outdated technologies such as old-fashioned mass-burn incineration which is poorly designed, visually intrusive and releases high levels of noxious emissions. Furthermore, the Mayor's requirement that waste to energy facilities should achieve a positive carbon outcome.

EU Waste Directives imposes high standards on modern energy recovery facilities to minimise the impact of negative environmental effects on the environment and human health resulting from emissions to air, soil, surface and ground water.

Any new energy recovery facilities built within the plan area must meet the requirements of the Directive and the Environment Agency (EA) will only issue a permit if they are satisfied the plant will be designed, built, operated and maintained in such a way that the requirements of the Directive are met and human health and the environment are protected.

The issuing of a permit marks the first stage of the EA's regulation of an incinerator. The EA then continually assesses the plant operations and its environmental performance. This will include the continuous and periodic monitoring of emissions by the operator, check monitoring by the EA and frequent plant inspections.

Therefore, in accordance with the London Plan and Plan Objectives 1, 2, 4 and 5:

#### **WP8: SUSTAINABLE ENERGY RECOVERY**

Proposed waste to energy developments will be required to:

- (a)** demonstrate that the waste identified for treatment cannot practically be reused or recycled in accordance with Policy WP1;
- (b)** demonstrate that the proposal will achieve a positive carbon outcome and contribute to local targets for reducing carbon emissions;
- (c)** deliver renewable heat and power (or heat, power and cooling), for local users where feasible; and,
- (d)** minimise potential adverse impacts on human health, local amenity and environment in accordance with Policies WP6 and WP7.

Any proposed thermal treatment facilities must allow for the recovery of renewable heat and power (or heat, power and cooling) and be within a fully enclosed covered building. Preference will be given to advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis.

<b>MONITORING FRAMEWORK FOR POLICY WP8</b>	
<b>Monitoring Indicators</b>	<b>Monitoring Targets</b>
(1) Number of permissions granted for waste management facilities including renewable energy regeneration <i>Source: Borough monitoring</i>	Not Applicable

- Flood risk compensation works;
- Archaeological investigation, recording and keeping of artefacts and safeguarding of remains;
- Off-site monitoring of emissions and the water environment; and,
- Provision and management of off-site or advance planting and screening.

### **WP9: PLANNING OBLIGATIONS**

Planning obligations will be used to ensure that all new waste management development or waste management 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.

### **WP9: Planning Obligations**

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 prevailing policies of the relevant borough.

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;
- Access and highway improvements;
- Provision of infrastructure, including low carbon and decentralised energy networks;
- Protection of sites of international, national, regional or local importance;
- Environmental enhancement;

<b>MONITORING FRAMEWORK FOR POLICY WP9</b>	
<b>Monitoring Indicators</b>	<b>Monitoring Targets</b>
Dependent on individual developments	Not Applicable



## Section 5: Site Descriptions

### Guide to the site descriptions

The following pages set out details of:

- Those existing waste transfer sites identified in Schedule 1 which are likely to be developed as waste *management* facilities during the period 2011-2016, and;
- Those existing industrial areas where additional waste management capacity may be suitable and are identified in Schedule 2.

**Proposals Map Designations:** These set out the designations covering the site on the relevant borough's Proposals Map. They are correct as of September 2010 but may be amended as boroughs update their Development Plan. Please note that the maps accompanying the site details are at different scales.

**Constraints:** These are the principal constraints identified in the site selection

process. It is not an exhaustive list of constraints and but provides an indicative guide.

### Comments from Previous

**Consultations:** These are the principal issues raised in relation to the site at either the Preferred Option consultation (July-October 2009) or the Additional Sites consultation (February- March 2010). The table shows how the issues raised have been addressed.

**Key Issues to Consider:** This section sets out the key issues that developers should consider when putting forward a waste management scheme for the site. The guide does not constitute a comprehensive list of criteria for development and all schemes with need to comply with the Development Plan policies of the relevant borough.

**EXISTING SITE IDENTIFIED IN SCHEDULE 1:**

**DEVELOPMENT OF THESE SITES IS ANTICIPATED DURING THE PLAN PERIOD 2011-2016**

**INDEX**

<b>Site reference</b>	<b>Site Description</b>	<b>Borough</b>
1	Factory Lane Transfer Station	Croydon
6	Villiers Road HRRC	Kingston
9	Garth Road HRRC	Merton
18	The Viridor Recycling and composting centre Beddington	Sutton
126	Benedict Wharf Transfer Station (also a small MRF onsite)	Merton
27	SITA transfer station, Weir Road	Merton
17	Country Skip Hire	Sutton

**SITE 1: FACTORY LANE**  
**Croydon**



**Site Description:** The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycle centre and waste transfer station. Active gas holders lie to the north-west of the site and power lines are overhead.

The Wandle Park lies to the south-east of the site. Access from the site is via Factory Lane to the trunk road network, A235/A236.

**Site Area:** 1.79ha

**Proposals Map Designations:** Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006). It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, close to Local Open Land and a Green Corridor and partly within an Area at Risk of Flooding.

**Site Constraints:**

The site is partly within Flood zone 3b and contains an archaeological site. The site has limited opportunities for sustainable transport of materials in and out of the site.

**Site Opportunities:**

The site is an established industrial area, with established waste use.

**Objections from Previous Consultations:**

Issue Raised	Action Taken
Pollution (air, water, noise)	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

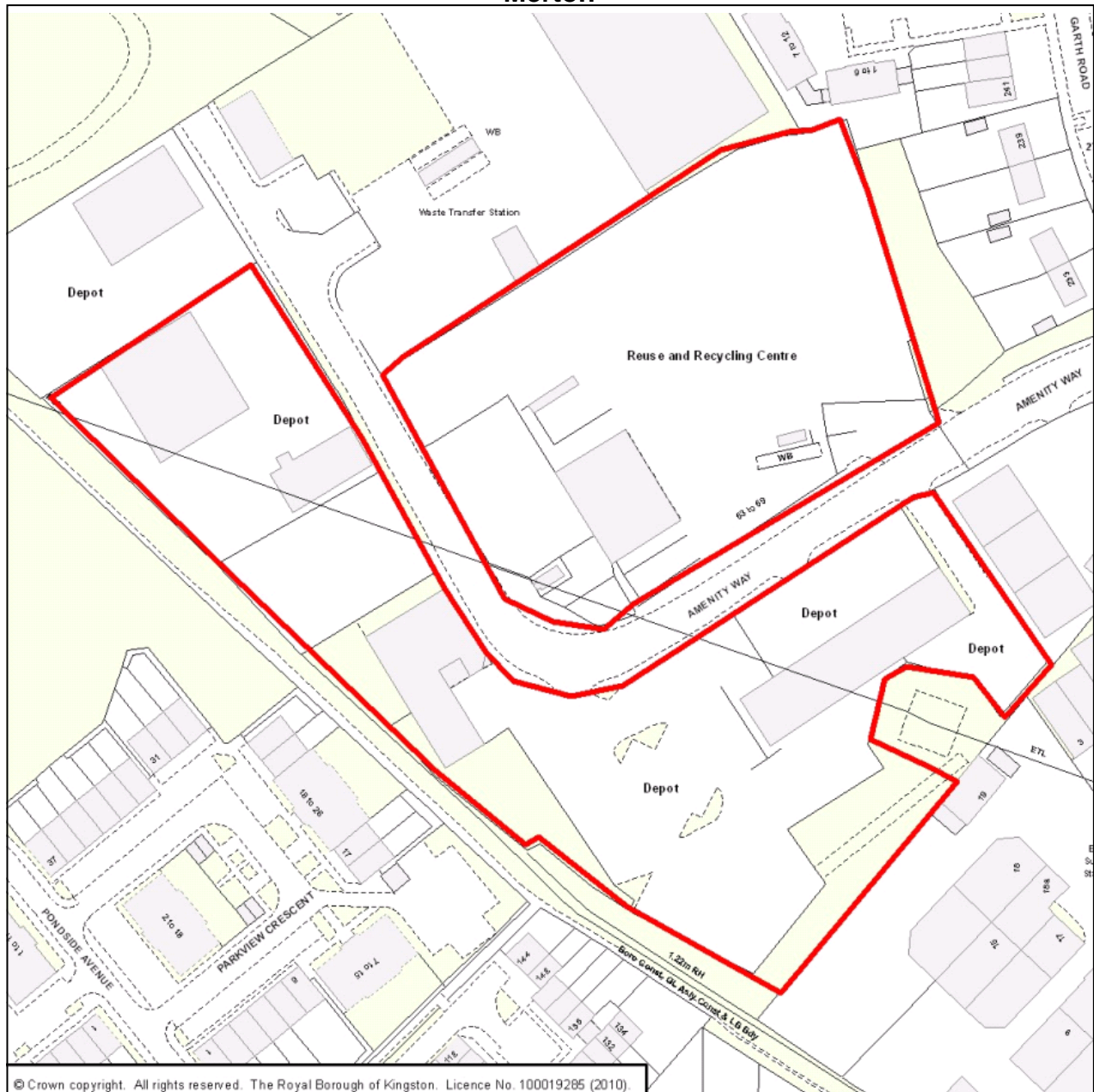
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the nearby Wandle Park;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Remediating the site of historical contamination
- The following protected species and habitats that have been sited on or within the vicinity of the site within the last five years: West European Hedgehog, Stag Beetle and House Sparrow.

**Delivery:** This site is owner occupied by Croydon Borough Council and is in use as a waste site. Together with Site 9 (Garth Road Civic Amenity Site) and Site 6 (Villiers Road), the South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste.

There is potential for one or more of these transfer stations to be developed during the Plan period 2011-2016.

## SITE 9: GARTH ROAD CIVIC AMENITY SITE

### Merton



**Site Description:** The site is part of a larger industrial area which Merton Council wholly owns. At present, the site accommodates a household reuse and recycling centre and Merton Council's highways depot with salt storage. To the north of the site is a waste transfer site and a plant hire operator, to the east and southwest are houses and to the southeast are industrial units. Along the southwestern boundary are a 'Green Corridor' and a SINC.

From the A24 to the south of the site, access is gained via Garth Road, which has houses and part of the Garth Road Industrial Estate along it.

**Site Area:** 2.05ha

**Proposals Map Designations:** Industrial Area, Special Industrial Zone and a part of the site incorporates Site Proposal 17P proposing a Waste Treatment Facility including a buffer zone and environmental improvements (Merton Adopted Unitary Development Plan, 2003). The London Plan protects the existing waste management facility.

**Site Constraints:** No direct access to the Strategic Road Network, limited opportunities for sustainable transport and is adjacent to a locally important Nature Conservation Area.

**Site Opportunities:** The site is in single ownership, is in an established industrial area and a part is currently being used as a waste management facility.

**Objections from Previous Consultations:**

<b>Issue Raised</b>	<b>Action Taken</b>
Pollution	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

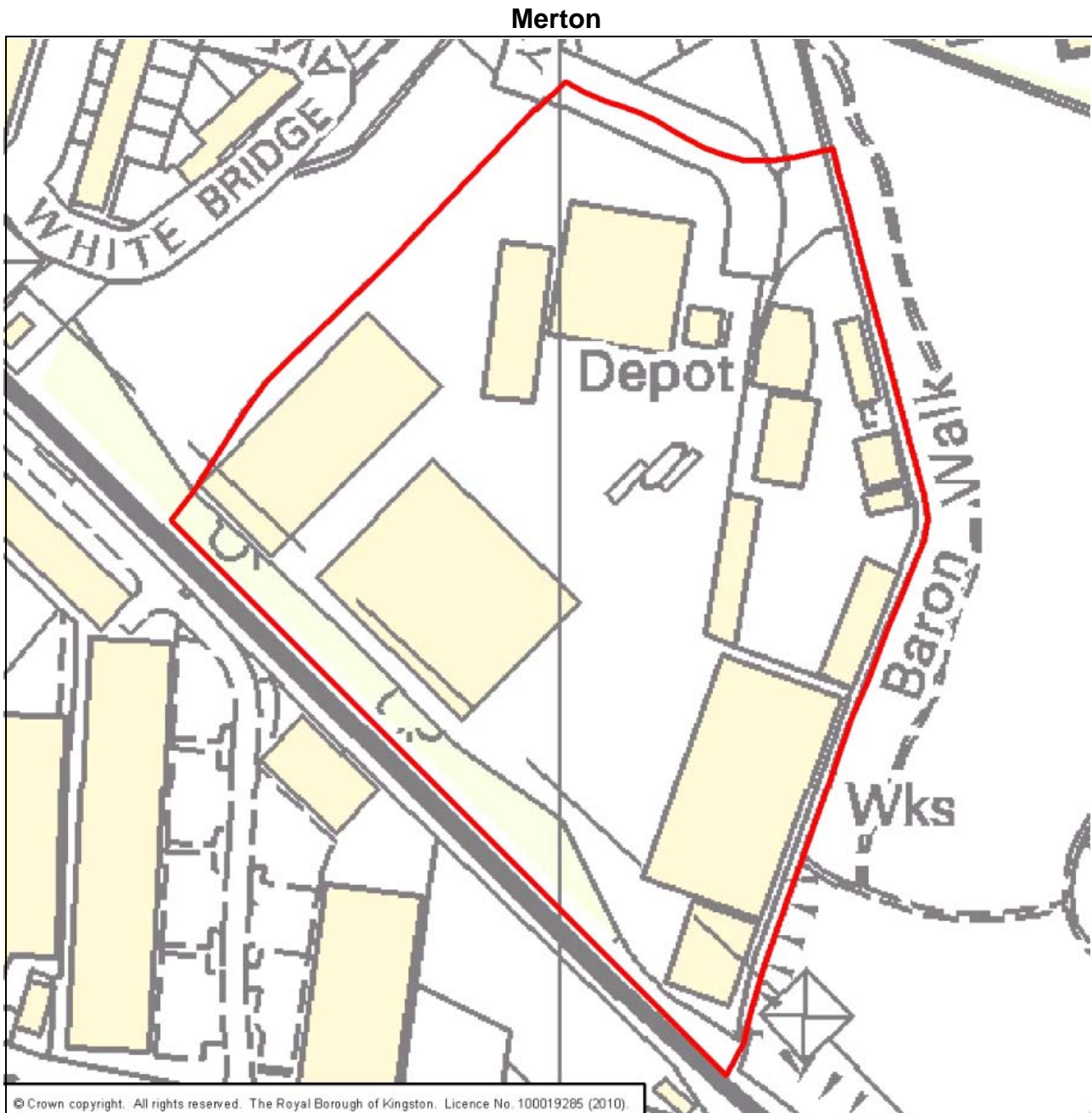
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Developing a facility which could make heat and/or power available to local users
- Discussion with the local authority regarding the potential relocation of the household waste and recycling centre, should this be displaced and should the facility need replacing
- Remediating the site of historical contamination
- No protected species have been sited onsite. The following protected species and habitats have been sited within the vicinity of the site:
  - To the north east of the site at Mayflower Park, the following have been recorded: Common starling, Hedge Accentor, Herring Gull, Lesser Noctule Pipistrellus pipistrellus, Soprano Pipistrelle and Daubenton's Bat.
  - To the north east of the site at Joseph Hood Recreation Ground, a Lesser Noctule, Pipistrellus and Song Thrushes have been sighted.



- To the south west of the site, at postcode KT4 8N: frogs, toads and starlings have been sighted.
- In 2007, in Mayflower Park, the comment on Eurasian Badgers states “may be foraging near the raised viewpoint area. There are no badgers on site.”

**Delivery:** This site is owner occupied by Merton Borough Council and is in use as a waste site. Together with Site 1 (Factory Lane) and Site 6 (Villiers Road), the South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. There is potential for one or more of these transfer stations to be developed during the Plan period 2011-2016.

## SITE 126: BENEDICT WHARF WHOLE SITE



**Site Description:** This existing waste site presently occupied by a waste transfer facility, Materials Recycling Facility, vehicle depot and a chemical plant. The Benedict School is opposite the main access point to the north of the site, there are playing fields to the east, on the opposite side of the tramline there is an industrial estate to the west, and there are houses <100m of the site boundaries to the north west, south and east.

Access to the site is approximately 500m on residential roads after leaving the trunk road network (A217).

**Site Area:** 3.87ha

**Proposals Map Designations:** Industrial Area, Site Proposal 10P proposing a B1 use and Site Proposal 26P proposing waste treatment facilities, traffic management measures and environmental improvements, adjacent to MOL, Open Space, SINCE, Green Chain, Green Corridor and Conservation Areas (Merton Adopted Unitary Development Plan, 2003). The site is within an industrial area designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site, is protected by the London Plan.

**Site Constraints:** No direct access to the Strategic Road Network, limited opportunities for sustainable transport, adjacent to a Nature Conservation Area and Strategic Views from neighbouring Conservation Areas, is an archaeological site.

**Site Opportunities:** The site is designated for industrial purposes and is currently being used as a waste management facility. The site is designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site is protected by the London Plan.

**Objections from Previous Consultations:**

<b>Issue Raised</b>	<b>Action Taken</b>
Views from Conservation Areas	Policy WP7 strengthened, see paragraph 1 and points (c) and (i) particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

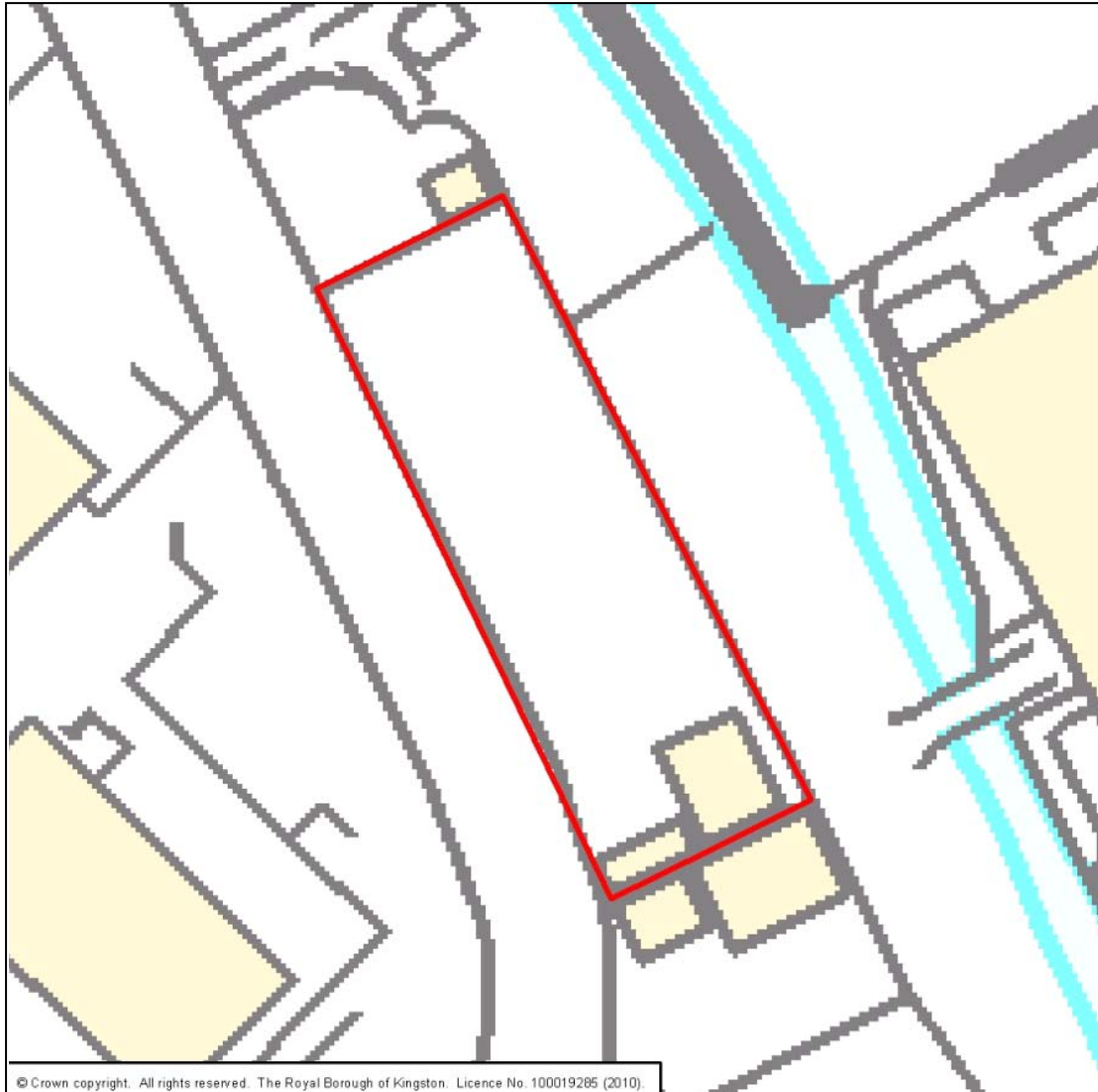
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting the character and the views into and from the neighbouring Conservation Areas;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Developing a facility which could make heat and/or power available to local users
- Remediating the site of historical contamination
- The following protected species and habitats that have been sited onsite:
  - In 2008, at Mitcham Recycling centre, Hallowfield Lane Mitcham, a Noctule Bat was sighted "feeding over floodlights over waste transfer station".

- A *Pipistrellus pipistrellus* and a Soprano Pipistrelle have also been sighted at Mitcham Recycling centre.
- The following protected species and habitats have been sited within the vicinity of the site:
  - To the south west of the site at Ravensbury Park: Daubenton's Bat, a Lesser Noctule, a *Pipistrellus pipistrellus*, a Soprano Pipistrelle, a *Pipistrellus*, a Noctule Bat and a Song Thrush were recorded in 2006 and 2008.
  - To the north west of the site, in Morden Hall Park a *Populus nigra* subsp. *Betulifolia* has been recorded.
  - Data indicates a variety of bird and bat species, a few plant varieties and a frog.

**Delivery:** At the time of writing, SITA (the current occupier) has submitted a planning application to develop the site for waste management purposes. The consideration of this application may result in the amendment of the site boundary. In May 2010, SITA expressed no intention to vacate the site or to sell the freehold.

## SITE 27: WEIR ROAD TRANSFER STATION

Merton



**Site Description:** This small SITA owned site is located along the eastern boundary of the Durnsford Road Industrial Area and the former open waste transfer use has temporarily ceased while the decision of a planning application for Materials Recycling Facility is awaited. The surrounding buildings vary between 6m and 20m high. The River Wandle runs along its eastern boundary and the rest of the site borders the remainder of the Durnsford Road Industrial Area.

Access to the A218 is gained via the Durnsford Road Industrial Area.

**Site Area:** 0.3ha

**Proposals Map Designations:** Industrial Area, Special Industrial Zone, 1 in 100 year floodplain, Archaeological Priority Zone, the River Wandle along the eastern boundary is MOL, SIN, Green Chain and Green Corridor and a Leisure Walking Route (Merton Adopted Unitary Development Plan, 2003). The site is within an industrial area designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site is protected by the London Plan.

**Site Constraints:** Limited opportunities for sustainable transport, adjacent to a locally important Nature Conservation Area and within a Flood Zone and a Local Archaeological Site.

**Site Opportunities:** The site is in an established industrial area and, although not immediately on the Strategic Road Network, it has easy access from a strategic road. The site is within an industrial area designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site is protected by the London Plan.

**Objections from Previous Consultations:**

None raised for this site. However, issues to consider will be similar to those identified for the Durnsford Road Industrial Area (Site 642)

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Evaluating and preserving any archaeological remains;
- Minimising flood risk on- and off-site;
- Remediating the site of historical contamination
- Developing a facility which could make heat and/or power available to local users
- The following protected species and habitats are recorded as being sited on or within the vicinity of the site, although records show that all sightings require confirmation: common Kingfisher, Common Linnet, Common Starling, Hedge Accentor, House Sparrow, Pipistrellus, Reed Bunting, Stag Beetle.

**Delivery:** At the time of writing, this site is owned by SITA (a waste operator) who has submitted a planning application for a Materials Recycling Facility on the site. In May 2010,

SITA expressed no intention to vacate the site or to sell the freehold. Currently it appears that the site has good potential for deliverability in the short, medium and longer term.



**SITE 6: VILLIERS ROAD  
Kingston**



**Site Description:** The site is the boroughs' existing waste transfer station and household waste and recycling centre. Existing buildings include a 20-25m high shed with 2-storey light industrial units to the west. Thames Water's sewage treatment works lies to the east and the site is bordered by the River Hogsmill and the cemetery to the North.

**Site Area:** 1.86ha

**Proposals Map Designations:** Formerly Proposals Site 26 and currently designated as a site of archaeological importance. (Kingston Unitary Development Plan, 2005 as amended in 2008).

**Constraints:** No access to the strategic road network. Access is therefore from the A2043 Cambridge Road, then via the local distributor residential roads: Hawkes Road, then Villiers Road. Key junctions of concern are Villiers Road / Hawkes Road and Cambridge Road / Hawks road, both of which are running at capacity at peak hours with limited opportunity for improvement due to narrow footways and close proximity of buildings. The site is in close proximity to a local nature conservation area to the north and south and affords no opportunities for sustainable transport. Part of the site is also at risk of flooding.

**Opportunities:** The site is in existing waste use and over 100m from the nearest houses (to the south-west of the site). The site is partially screened in the south-west corner and well screened around the rest of the perimeter by Kingston cemetery to the north, Thames water land to the east and a local nature conservation area to the south. The site falls within the Hogsmill Master Plan area and therefore development must consider the implications of this. It should be noted that the Hogsmill area has been identified as potentially suitable for the production of heat and power as part of a decentralised energy network.

The Hogsmill River runs adjacent to the site giving potential for enhancement works to this feature. The river is currently in a heavily engineered state in this area and improvements to the buffer zone could be incorporated to improve the river corridor.

**Objections from Previous Consultations:**

<b>Principal Issue Raised</b>	<b>Action Taken</b>
Traffic impact and safety concerns	Policy WP7 strengthened, see point (g) particularly
Proximity to residents and local schools	Policy WP7 strengthened, see point (c) particularly
Water pollution to the Hogsmill River	Policy WP7 strengthened, see point (e) and (f) particularly
Loss of residential amenity	Policy WP7 strengthened, see paragraph 1 particularly

**Issues to consider:**

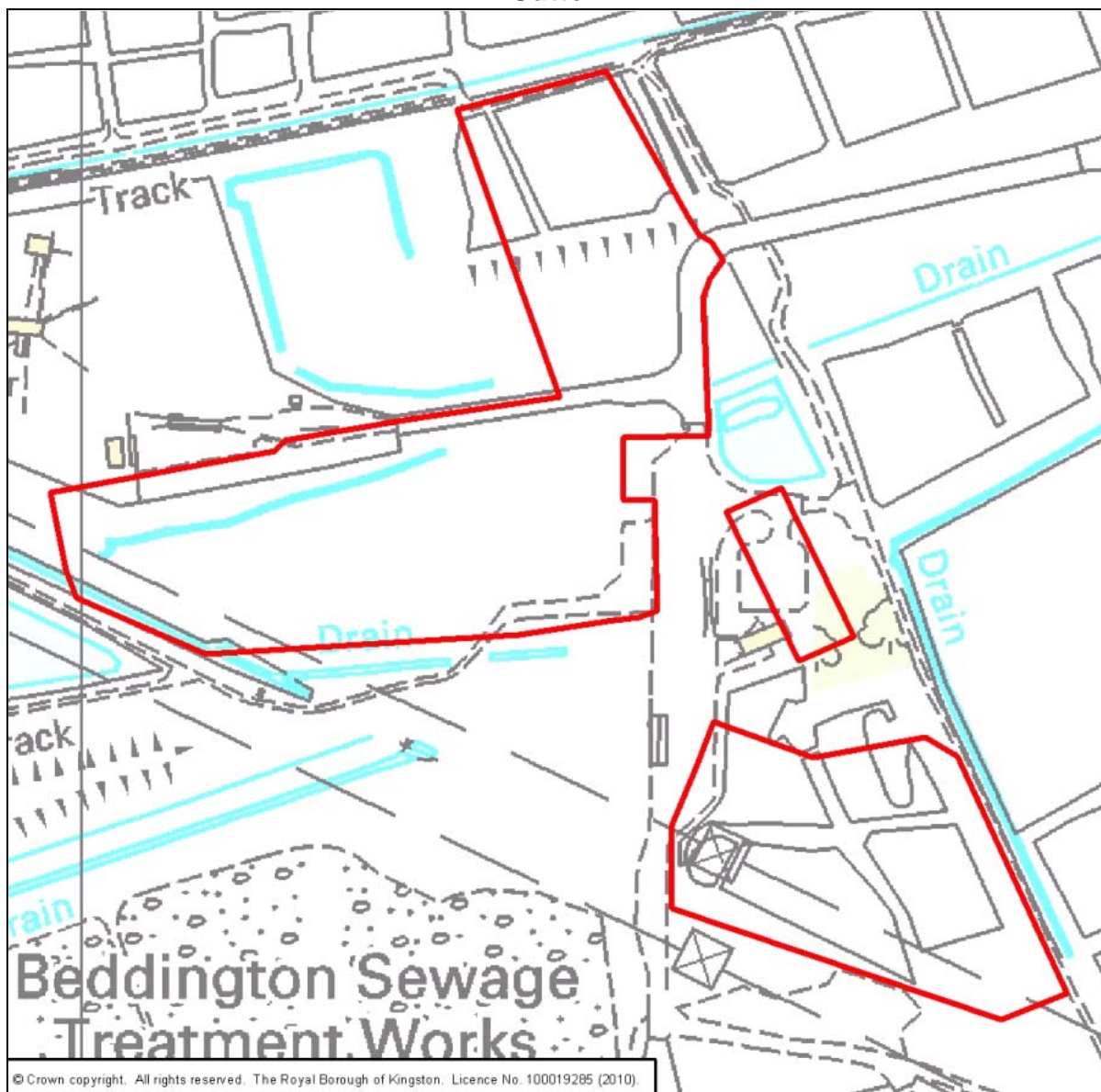
Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties in the vicinity of the site, especially those in close proximity to the SW and in particular with regard to air quality which is poor as a result of the cumulative effects of various activities;

- Opportunities to improve the access to the site should be investigated. Traffic impact on surrounding residential roads must be minimised and increased in traffic must be avoided.
- Taking measures to maintain the existing nature conservation value of the site, with particular attention to the Hogsmill river;
- Ensuring groundwater and watercourses are not harmed by any development and taking opportunities to improve the river Hogsmill;
- Respecting buffer zones to the Hogsmill River, as advised by the Environment Agency;
- Designing a facility which does not significantly impact on the adjacent metropolitan open land.
- Remediating the site of historical contamination
- The following protected species have been sited on the site:
  - In June 2008, Common Starling sightings in Kingston Cemetery noted that they were “gathering food to take to young in waste transfer station and young also feeding on grass”.
- The following protected species have been sited off site:
  - To the north of the waste transfer site, lies Kingston Cemetery, a wide variety of birds: House Sparrow, Song Thrush, Hedge Accentor, Common Starling, Herring Gull, Common Kingfisher, Redwing, Sand Martin, Common Linnet, Common Bullfinch, Lesser Redpoll, Northern Lapwing, Eurasian Hobby, Green Sandpiper, Lesser Spotted Woodpecker have been recorded. Bat species, Pipistrellus pipistrellus and Soprano Pipistrelle as well as a Grass Snake and Water Vole were recorded.
  - To the north/northwest of the site, at Bonner Hill Road, various species of bats and birds have been sighted.
  - Knights Park lies to west of site, where a variety of bird species such as the Kingfisher and a variety of bat species: Common Pipistrelle, Daubenton’s Bat, Lesser Noctule, Natterer’s Bat, Pipistrellus and Soprano Pipistrelle have been spotted.
  - To the east of site, lies the Hogsmill River where various species of birds and a water vole have been recorded.
  - To the south/south east of waste transfer site, lies Berrylands, where Sand Martins have been sighted.
  - A Eurasian Badger was sighted in June 2007 at Bonner Hill Road

**Delivery:** This site is owner occupied by Kingston Council and is in use as a waste site. Together with Site 9 (Garth Road Civic Amenity Site) and Site 1 (Factory Lane), the South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. There is potential for one or more of these transfer stations to be developed during the Plan period 2011-2016.

**SITE 18: VIRIDOR RECYCLING CENTRE**  
**Beddington Farmlands, Beddington**  
**Sutton**



**Site Description:** The site is located on open land which abuts an industrial area. There is sewage works infrastructure surrounding a significant part of the site with some industrial uses to the east. The current waste operator has a licence for the site until 2023, after which the site is intended to become a Country Park within the proposed Wandle Valley Regional Park. Access is from Beddington Lane.

**Site Area:** 5.02ha.

**Proposals Map Designations:** Metropolitan Open Land, Metropolitan Green Chain, Land Safeguarded for the Wandle Valley Country Park, Archaeological Priority Area, Metropolitan Site of Importance for Nature Conservation.

**Constraints:** No direct access to the Strategic Road Network, site intended for strategic open space and nature conservation uses, limited opportunities for utilising sustainable transport modes and a locally protected view.

**Opportunities:** Site already accommodates long-term temporary waste management uses, the site is distant from residential areas and the vehicle routing to the site is primarily through an industrial area.

**Objections from Previous Consultations:**

Principal Issue Raised	Action Taken
Planning designations should be respected	Schedule 1 indicates waste management use is a temporary use and will not be continued beyond 2023 when the site will become part of the Wandle Valley Regional Park. Also, see Schedule 4, Point 36 regarding restoration and after care
Biodiversity should be protected	Policy WP7 strengthened, see point (b) particularly
The Sewage Treatment Works may need to expand	This a matter being discussed between the landowners, Thames Water Ltd, and the regulator OFWAT

**Issues to consider:**

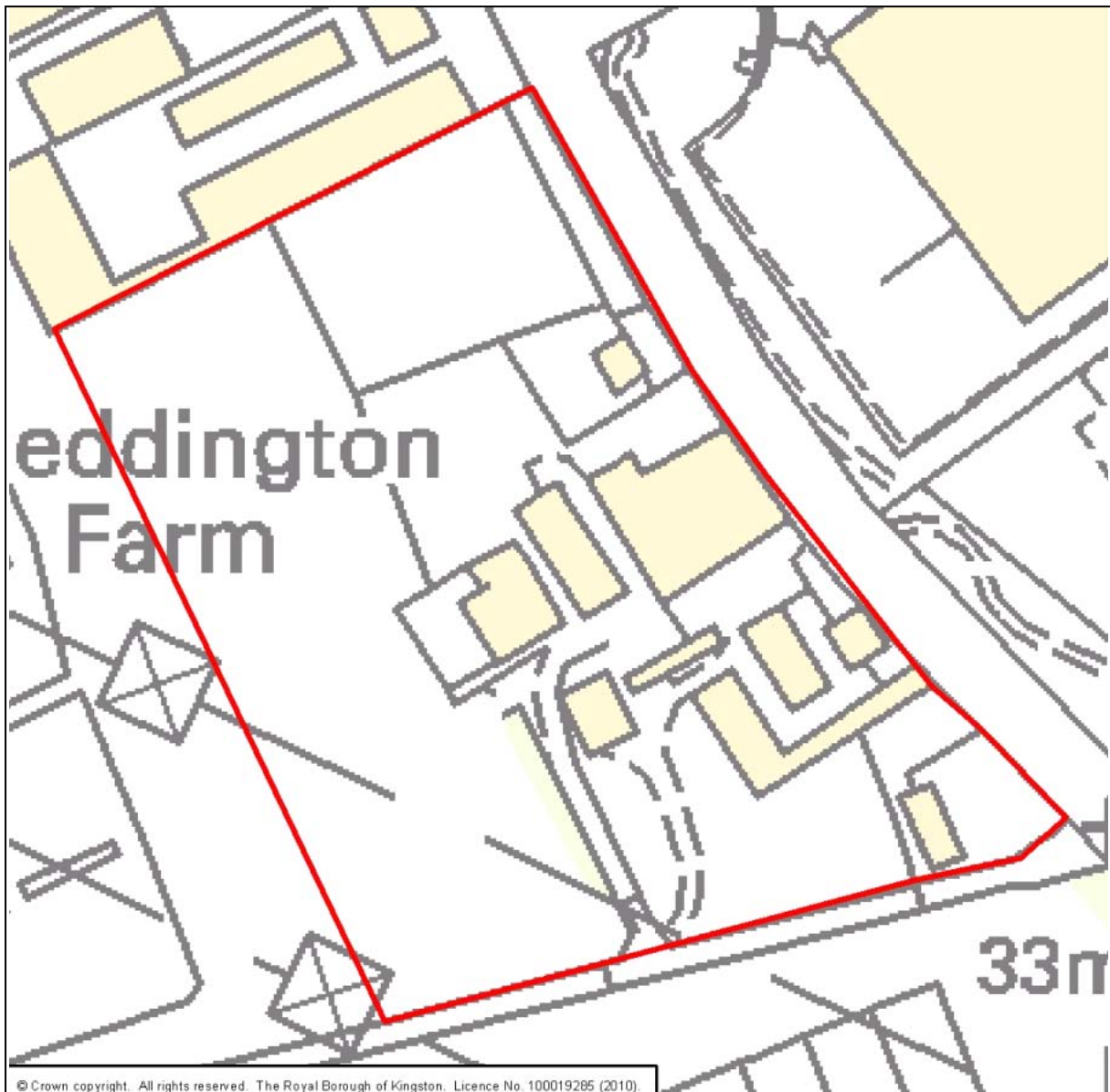
Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring that the site is made available for the creation of the Wandle Valley Regional Park by the end of 2023:
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air quality which is poor as a result of the cumulative effects of various activities;
- Taking measures to maintain the existing nature conservation value of the site;
- Ensuring groundwater and watercourses are not harmed by any development;
- Ensuring that traffic to and from the site is routed to avoid residential areas as far as possible and the volume of traffic is not unduly increased; and,
- Designing a facility which does not significantly impact on the openness of Beddington Farmlands.
- Remediating the site of historical contamination

- A large number of protected species and habitats have been sited. Sightings are recorded as 'Beddington sewage Farm' which is adjacent to the existing waste facilities. Species recorded in the vicinity of the site include: Annual Knawel, Arctic Tern, Bar-tailed Godwit, Blue-Headed Wagtail, Common Bullfinch, Common Kingfisher, Daubenton's Bat, Eurasian Curlew, Eurasian Tree Sparrow, Common Goldeneye, Green Sandpiper, Eurasian Marsh Harrier, Lesser Spotted Woodpecker, Stag Beetle, House Sparrow, Hedge Accentor, Lesser Redpoll, Northern Pintail, Sand Martin, Reed Bunting, Red Kite, Northern Lapwing, Greylag Goose, Peregrine Falcon, Black-tailed Godwit, Bar-tailed Godwit, Tree Pipit, Tundra Swan, Yellow Wagtail, Spotted Flycatcher.

**Delivery:** The operator has previously submitted an application on the site, which the Borough has resolved to grant.

**SITE 17: COUNTRY WASTE RECYCLING LTD**  
**79-83 Beddington Lane, Beddington**  
**Sutton**



**Site Description:** The site is located within a Strategic Industrial Area with sewage works infrastructure to the west, industrial uses to the north and east and open land to the south. The south western portion of the site is crossed by overhead electricity cables. The site is currently used as an open air waste transfer station with recovery activities and is unsatisfactory within the context of modern waste management practices. Access is from Beddington Lane and Mile Road.

**Site Area:** 2.38ha.



**Proposals Map Designations:** Site of Importance for Nature Conservation, Strategic Industrial Area, Archaeological Priority Area

**Constraints:** Non-direct access to the Strategic Road Network, partly a nature conservation area, limited opportunities for utilising sustainable transport modes and a locally protected view.

**Opportunities:** Site already accommodates waste management uses but needs modernisation and the routing to the site should be primarily through an industrial area.

**Objections from Previous Consultations:**

Principal Issues Raised	Action Taken
The current site has a severe amenity impact	Policy WP7 strengthened, see paragraph 2 particularly
The traffic impact is severe	Policy WP7 strengthened, see point (g) particularly
The site is not enclosed	Policy WP7 strengthened, see paragraph 2 particularly
The site is near a school	Policy WP7 strengthened, see point (c) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- 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 facilities on site;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air quality which is poor as a result of the cumulative effects of various activities;
- Ensuring that traffic to and from the site is routed to avoid sensitive receptors and residential properties as far as possible and the volume of traffic is not unduly increased;
- Taking measures to maintain the existing nature conservation value of the site and providing off-site mitigation measures if this is not possible;
- Ensuring groundwater and watercourses are not harmed by any development; and
- Designing a facility which does not severely impact on the openness of Beddington Farmlands.
- Remediating the site of historical contamination
- The following species and habitats have been sited on or in the vicinity of the site: stag beetle, Eurasian Tree, Sparrow, Common Starling, Common Frog, House Sparrow, Cornflower, Caraway

**Delivery:** The operator has previously submitted an application on the site, which the Borough has resolved to grant. An application for a combined heat and power facility has been submitted but not yet determined. The consideration of this application may result in the amendment of the site boundary.

**EXISTING SITE IDENTIFIED IN SCHEDULE 2:**

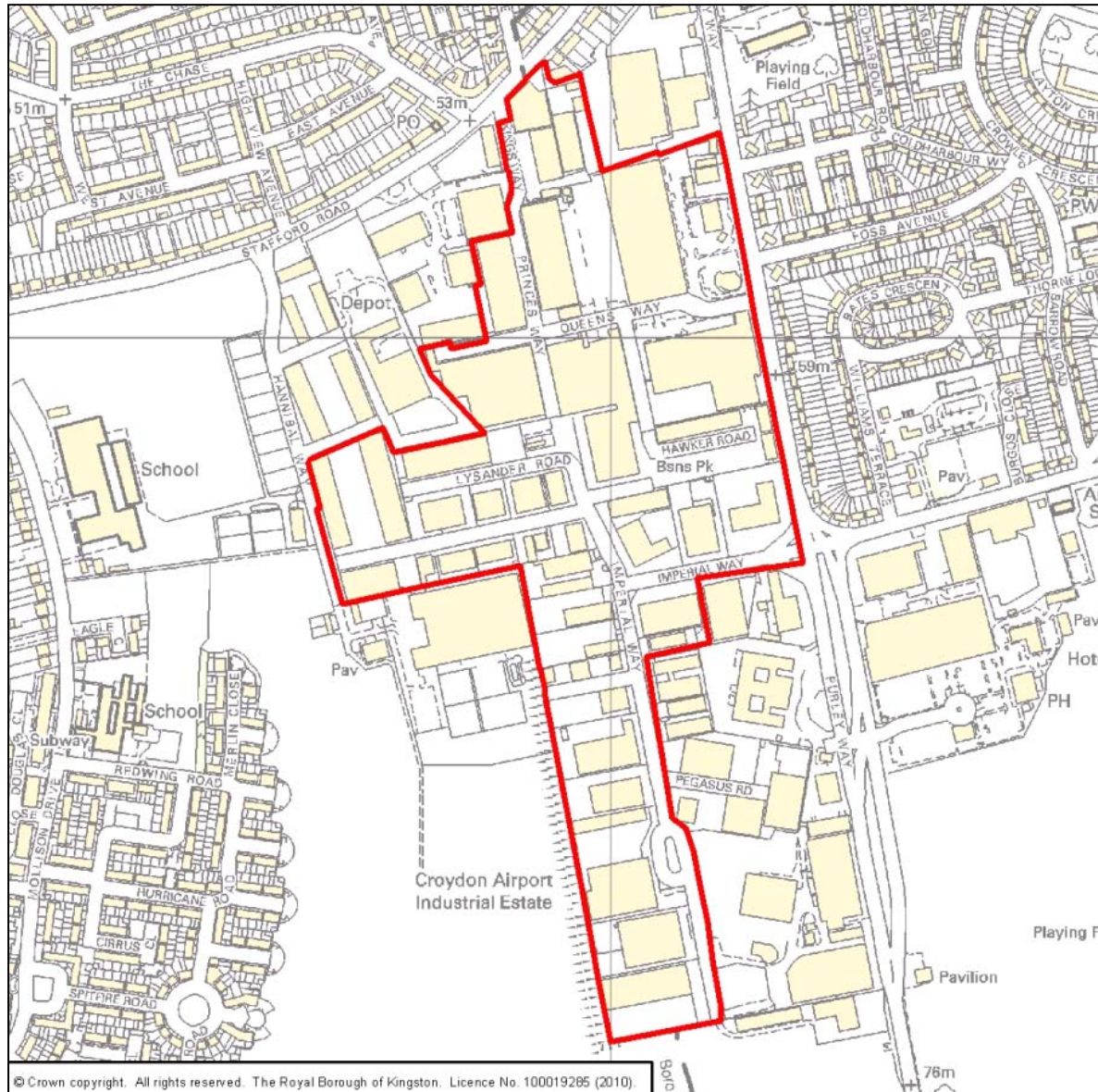
**DEVELOPMENT OF UP TO SEVEN HECTARES WITHIN THE FOLLOWING INDUSTRIAL AREAS IS ANTICIPATED DURING THE PLAN PERIOD 2016-2021**

**INDEX**

<b>Site Reference</b>	<b>Site Description</b>	<b>Borough</b>
102	Purley Way, Lysander Road and Imperial Way Industrial Area	Croydon
105	Factory Lane Industrial Estate	Croydon
125	Croydon Factory Lane (South Side)	Croydon
99	Croydon Purley Oaks Highway Depot	Croydon
351 /352 /353	Chessington Industrial Area	Kingston
641/642/651	Durnsford Road / Plough Lane Industrial Area	Merton
702	Garth Road Industrial Area	Merton
69	Willow Lane Industrial Area	Merton
1006	The Wandle Valley Trading Estate (part of)	Sutton
491	Kimpton Industrial Estate, Land north of Minden Road	Sutton
5312/532/533/534/535/539	Beddington Industrial Area	Sutton

# SITE 102: PURLEY WAY, LYSANDER ROAD AND IMPERIAL WAY INDUSTRIAL AREAS

## Croydon



**Site Description:** The industrial area lies on Croydon / Sutton boundary. At present, the site is a multi-use, multi-occupier trading estate. Existing uses include manufacturing, warehousing/storage/distribution, wholesale and motor retail amongst others. Existing buildings are predominantly clad steel frame construction, with a height of up to approximately 15 metres.

The site has direct access to the A23, which forms the eastern boundary of the site. Routing on the A23 beyond the boundaries of the site is in a primarily residential and amenity

setting. Open, public space, including sports grounds, surround the southern perimeters of the industrial area.

The site lies above a protected groundwater aquifer. Any waste related development on this site will therefore require particular attention and investigation of this issue (see 'site constraints' below).

**Site Area:** 24.69ha

**Proposals Map Designations:** Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006). It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, adjacent to Metropolitan Open Land. Sutton Council policies will also be relevant. A Grade II Listed Building is nearby. A locally important Nature Conservation Area is also adjacent to the site.

**Site Constraints:**

The site is close to a locally important nature conservation area, has limited opportunities for sustainable transport, the site contains a local archaeological site.

The site lies above a protected groundwater aquifer. The Environment Agency will object in principle to any proposed waste-related development onsite which has the risk of leaching pollutants. The Agency will also object in principle to any waste-related proposal which contains or generates liquid waste, especially if hazardous.

To ensure that risks of pollution to groundwater are investigated and mitigated against, a full assessment of the risks will be needed at the pre-planning application stage, with full liaison with the Environment Agency. The purpose of this assessment would be to consider the inherent risks associated with the proposed waste activity and provide sufficient information to evaluate the likelihood of a release being made. Storage of waste prior to processing also poses a significant risk and will need to be considered at this pre-application stage.

**Site Opportunities:** The site is an established Industrial Area.

**Objections from Previous Consultations:**

<b>Issue Raised</b>	<b>Action Taken</b>
Water pollution	Requirement for any proposal for waste related development on this site is accompanied by a full assessment of the risk to ground water. Full liaison with the Environment Agency is required at the pre-planning application stage.
Air pollution	Policy WP7 strengthened, see paragraph 1 particularly

Loss of residential amenity	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

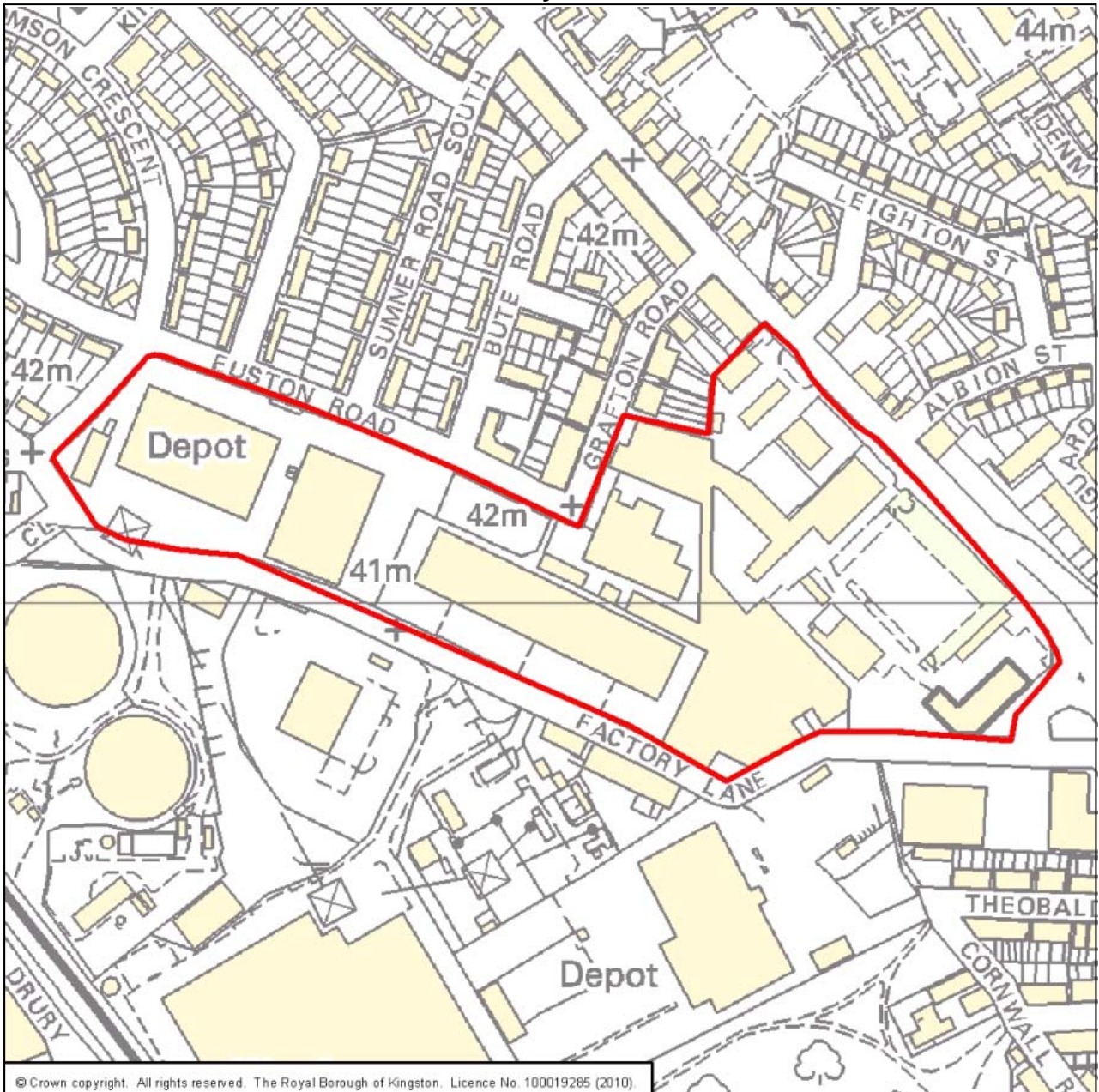
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Respecting the special character of the historic airport located in close proximity;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads;
- Respecting and enhancing the adjacent Nature conservation Area;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Remediating the site of historical contamination
- The following species and habitats have been sited on or in the vicinity of the site:  
Annual Knawel, Common Frog, Common Lizard, Common Starling, Dark Green Fritillary, House Sparrow, Sea Barley, Silver-studded Blu, Sky Lark, Slow-worm, Song Thrush, Spotted Flycatcher, Stag Beetle, West European Hedgehog

**Delivery:** There are opportunities for some waste management facility development in the second half of the plan period.



## Site 105: FACTORY LANE INDUSTRIAL AREA

### Croydon



**Site Description:** The site is an existing industrial area and is currently in multiple ownership and occupied by multiple tenants. Uses include small light industrial and commercial businesses. There is also a Territorial Army premises and a petrol filling station. The borough's transfer station and a reuse and recycle centre lies to the south of the site. The Wandle Park lies close by, to the south of the site. Active gas holders lie to the south-west of the site and power lines are nearby.



Access from part of the site is to Mitcham Road and for the rest access is via Factory Lane to the trunk road network, A235/A236.

**Site Area:** 7.02ha

**Proposals Map Designations:** Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006). It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, close to Local Open Land and a Green Corridor and partly within an Area at Risk of Flooding.

**Site Constraints:**

The site is close to a local Nature Conservation Area. The site has limited opportunities for movement of waste using sustainable transport. The site is within Flood Zone 2/3b. The site is also an archaeological priority zone.

**Site Opportunities:**

The site is an established industrial area, with established waste use adjacent, to the south.

**Objections from Previous Consultations:**

Issue Raised	Action Taken
Pollution (air, water, noise)	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly
Impact wildlife and people using the adjacent Wandle Park	Policy WP7 strengthened, see paragraph 1 particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or 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;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Remediating the site of historical contamination
- The following protected species and habitats have been sited onsite or in the vicinity of the site: Stag beetle, house sparrow and common starling.

**Delivery:** Parts of the north-eastern section of the site are recently developed or unlikely to come forward, however, there could be opportunities for some waste management facility development in the second half of the plan period.

## Site 125: FACTORY LANE (SOUTH SIDE)

Croydon



**Site Description:** The site is part of a larger industrial area. At present, the site accommodates a warehouse occupied by Tesco. It is adjacent to existing waste activity (a transfer station and household re-use and recycling centre) and the local authority's motor vehicle depot. Surrounding uses include small light industrial and commercial businesses. Active gas holders lie to the north-west of the site and power lines are overhead.

The site is bordered to the south-east by the Wandle Park. Access from the site is via Factory Lane to the trunk road network, A235/A236.

**Site Area:** 3.11ha

**Proposals Map Designations:** Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006). It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, adjacent to Local Open Land and a Green Corridor and partly within an Area at Risk of Flooding.

**Site Constraints:**

Site is close to a locally important nature conservation area, has limited opportunities for sustainable transport, is within Flood Zone 3b, contains a local archaeological site.

**Site Opportunities:**

The site is an established industrial area, with established waste use adjacent.

**Objections from Previous Consultations:**

Issue Raised	Action Taken
Pollution (air, water, noise)	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly
Impact wildlife and people using the adjacent Wandle Valley Park	Policy WP7 strengthened, see paragraph 1 particularly

**Issues to consider:**

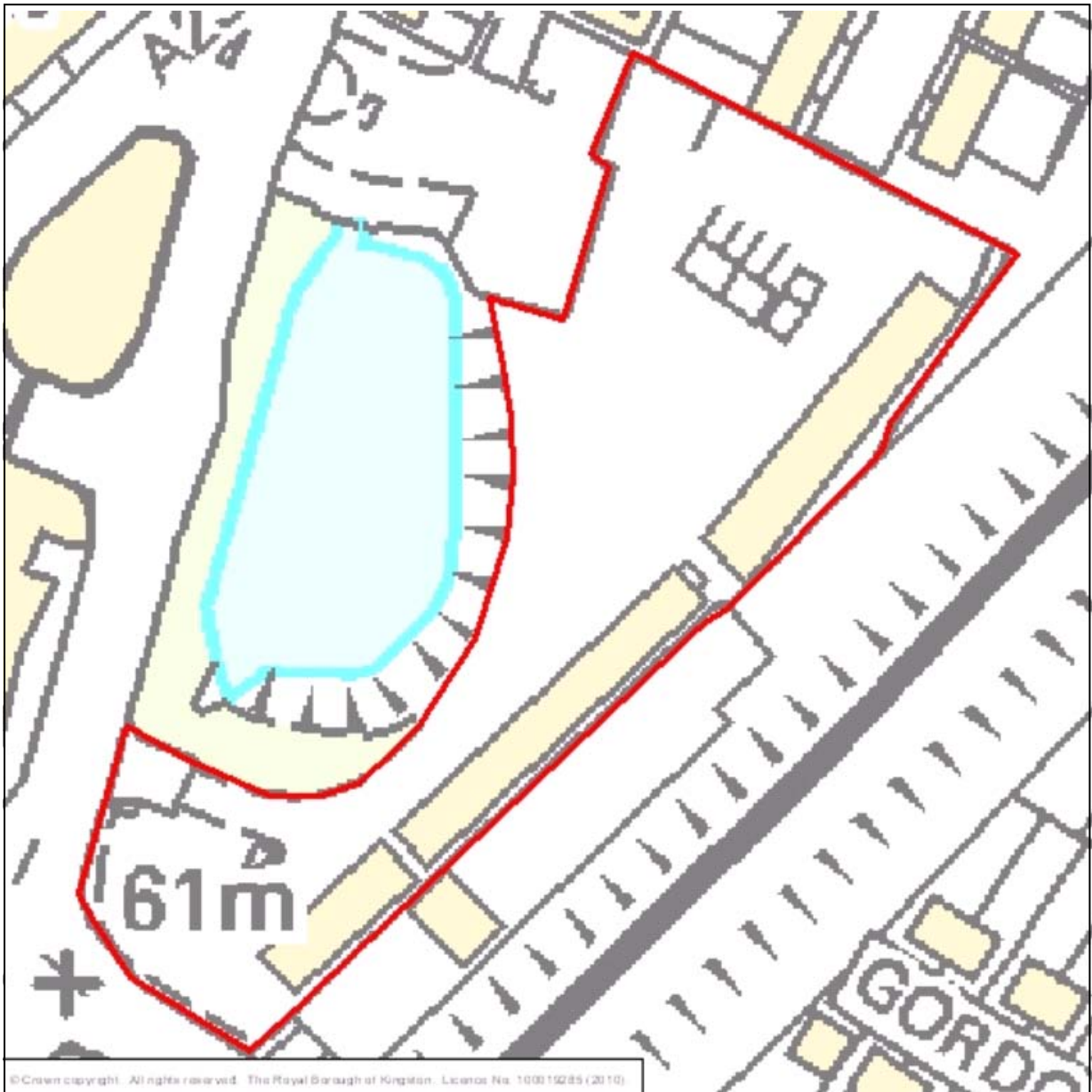
Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the adjacent Wandle Park;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Remediating the site of historical contamination
- The following protected species and habitats have been sited onsite or in the vicinity of the site: Stag beetle, house sparrow and common starling, west European Hedgehog and mistletoe.

**Delivery:** Oyster Jersey Property Fund owns the freehold of this site and the current tenant, Tesco, has 10 years remaining on its current lease.

## Site 99: PURLEY OAKS HIGHWAYS DEPOT

Croydon



**Site Description:** The site presently accommodates a council highways and motor transport depot. The site is primarily an open storage yard, with some buildings.

The site is bordered to the south-east by business premises and railway lines. Residential properties lie adjacent to the north and some screening is in place here. A pond lies adjacent to the west. To the north-west of the site is a household waste and recycling centre and the A235.

The site has access directly on to A235. Routing to the site on the A235 is in a primarily residential setting.

The predominant building height in the area is two storey. A five storey office development is located within 50m of the site.

**Site Area:** 1.06ha

**Proposals Map Designations:** The site is within an Archaeology Priority Zone (Croydon Adopted Unitary Development Plan, 2006), is adjacent to Local Open Land and adjacent to a Green Corridor. It is partly within an Area at Risk of Flooding.

**Site Constraints:**

Site is within Flood Zone 3b, contains a local archaeological site, has limited opportunities for sustainable transport.

The site lies above a Source Protection Zone 2 area. The site is therefore unlikely to be suitable for any waste-related proposal which contains or generates liquid waste, especially if hazardous. To ensure that risks of pollution to groundwater are investigated and mitigated against, a full assessment of the risks will be needed at the pre-planning application stage, with full liaison with the Environment Agency. The purpose of this assessment would be to consider the inherent risks associated with the proposed waste activity and provide sufficient information to evaluate the likelihood of a release being made. Storage of waste prior to processing also poses a significant risk and will need to be considered at this pre-application stage.

Any development must provide enhancements to the onsite wetland habitat and must ensure no net loss of wetland habitat.

**Site Opportunities:**

The site lies next to an existing HWRC facility.

**Objections from Previous Consultations:**

<b>Issue Raised</b>	<b>Action Taken</b>
Pond has recorded sightings of Kingfisher, common frog and stag beetles (a protected species)	Any development of the site must provide enhancements to the onsite wetland habitat and must ensure no net loss of wetland habitat.
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

**Issues to consider:**

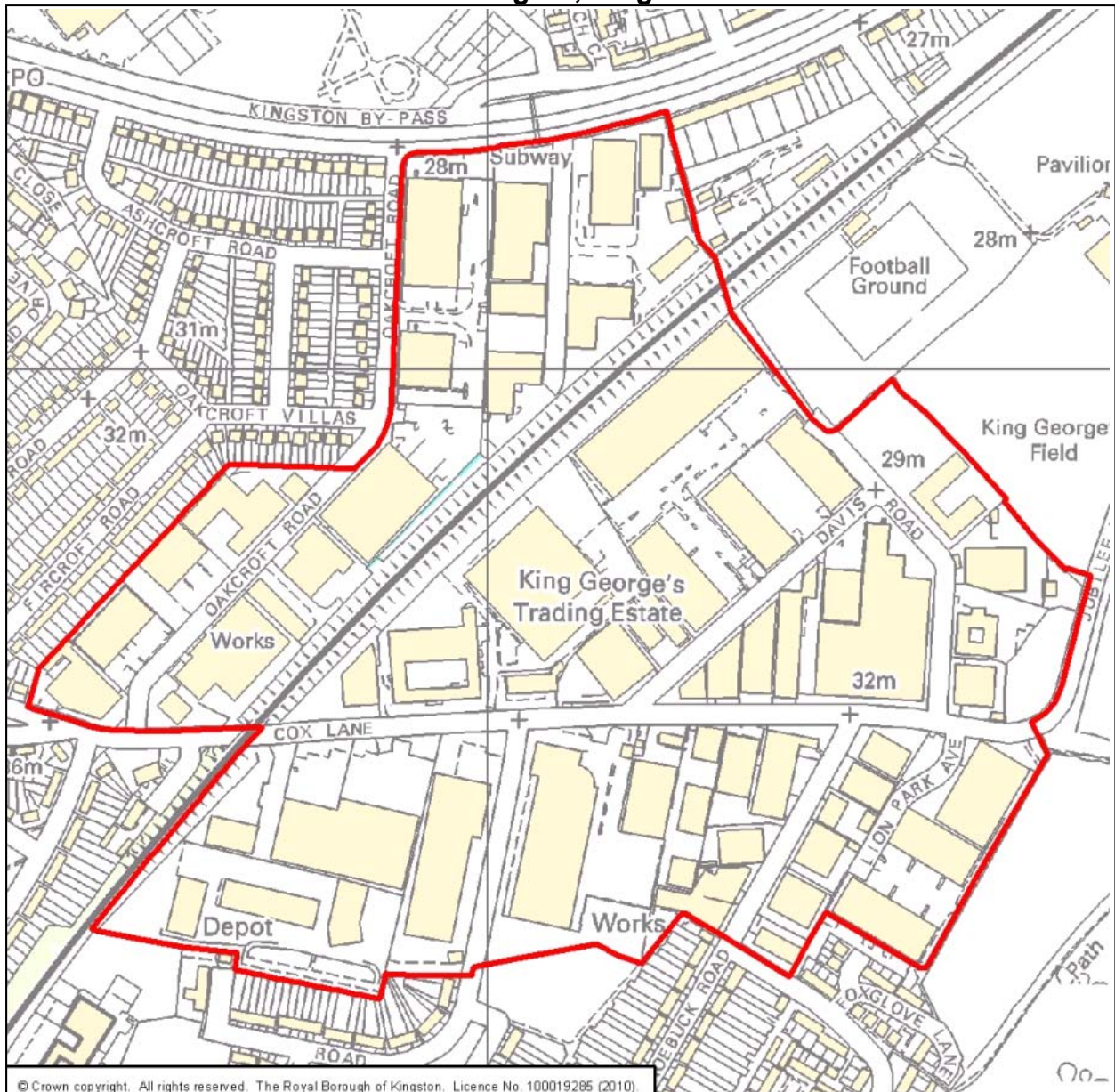
Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads;
- Respecting and enhancing the onsite wetlands habitat
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Remediating the site of historical contamination
- The following protected species and habitats have been sited onsite or in the vicinity of the site: House Sparrow, West European Hedgehog, Common Kingfisher, Common Frog, Common Toad, Stag Beetle, Vespertilionidae, Dingy Skipper, Mistletoe, Small Heath, Chalk Hill Blue, Red Hemp-nettle, White Helleborine, Shepherd's-needle

**Delivery:** The site is owned by Croydon Council. A recent planning application to expand the layout of the adjacent household waste and recycling centre remains undecided.



## CHESINGTON INDUSTRIAL ESTATE Chessington, Kingston



**Site Description:** The site is located in the south of the borough and is currently in multiple occupancy with a mixture of industrial, warehousing and technology units. Existing buildings range from around 18 metres to 30 metres high.

Metropolitan open land abuts the industrial area to the east. The site is bordered with residential properties to the south, the west and north east.

The A3 abuts the site along its northern edge and an elevated railway line runs through the site, surrounded by a green corridor.



Routing to the site is from the A240 is via Cox Lane and Jubilee Way which are suitable for industrial traffic.

**Site Area:** 34.91

**Proposals Map Designations:** Industrial Area (Kingston Unitary Development Plan, 2005 as amended in 2008) with a green corridor following the elevated railway line through the site.

**Constraints:** Residential properties adjoin the site to the south, east and north-west of the site. The site is adjacent to metropolitan open space. Local open space and a locally important nature conservation site lie to the south of the site. A drain runs adjacent to the NW portion of this site and development within 5 metres of the top of its bank should be avoided where possible. 7.5 ton lorry ban zones are in place in some nearby residential areas. Heavy Goods Vehicles should be prevented from using Hook Road South and from heading west under the rail bridge on Cox Lane. Routing to the site is from the A240 is via Cox Lane and Jubilee Way which are suitable for industrial traffic.

**Opportunities:** Site already accommodates industrial uses, parts of the site (particularly the eastern sections of the site) are distant from residential areas and the permitted vehicle routing to the site is primarily through an industrial area. The site has no flood risk issues. Some existing buildings may be suitable for adaptation to waste use. Development of any site within the industrial area should consider implications of the nearby Tolworth Regeneration Strategy area. There may be opportunities for the supply of heat and power to Tolworth.

**Objections from Previous Consultations:**

<b>Principal Issue Raised</b>	<b>Action Taken</b>
Traffic	Policy WP7 strengthened, see point (g) particularly
Proximity to residents and local schools	Policy WP7 strengthened, see point (c) particularly
Pollution	Policy WP7 strengthened, see point (e) and (f) particularly
Loss of residential amenity	Policy WP7 strengthened, see paragraph 1 particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

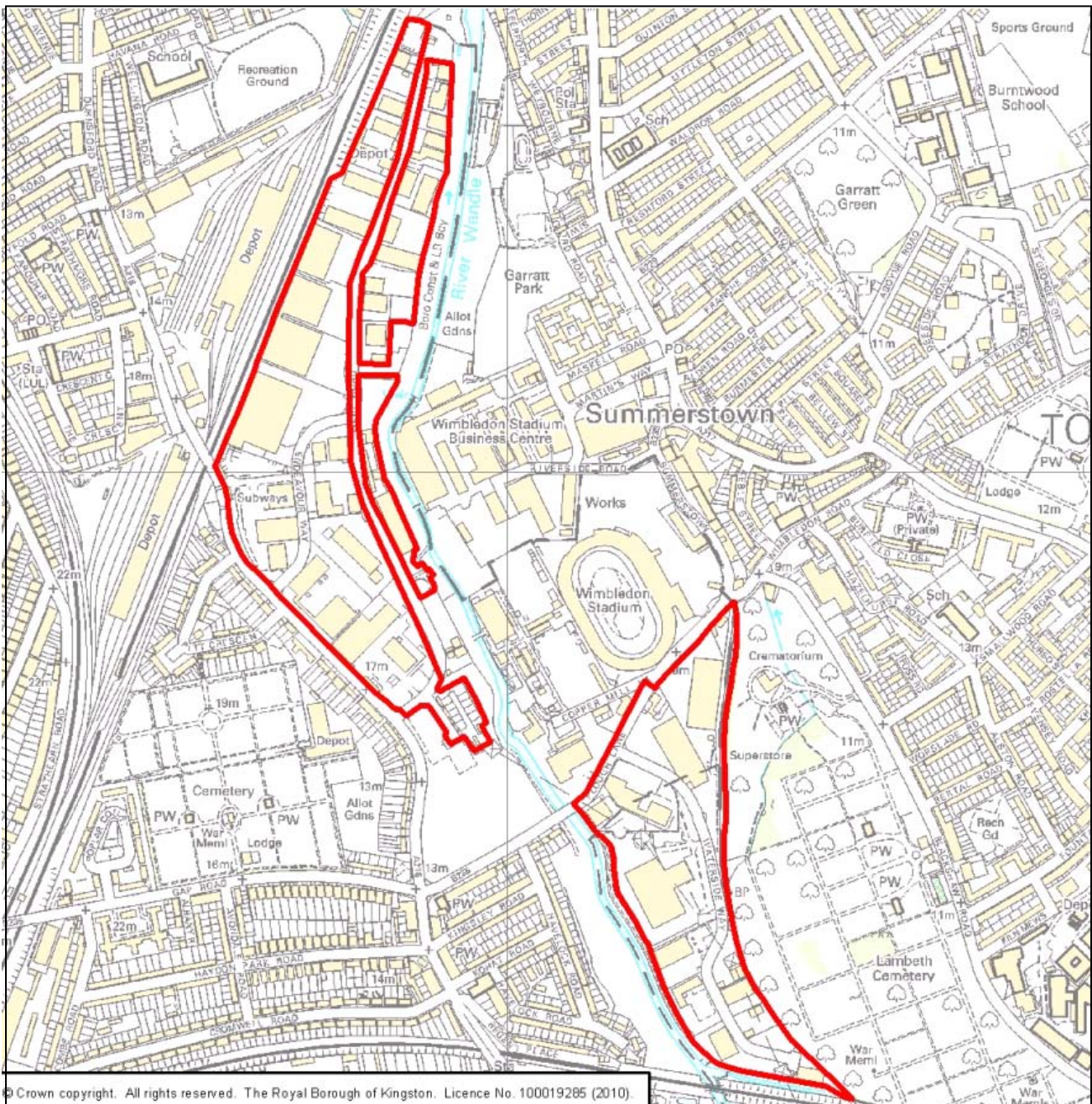
- Designing the site so that operations are carried out within a fully enclosed building;

- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air quality which is poor as a result of the cumulative effects of various activities;
- Taking measures to maintain the existing nature conservation value of the site, with particular attention to the green corridor which runs alongside the rail line through the site;
- Ensuring groundwater and watercourses are not harmed by any development;
- Ensuring that traffic to and from the site is routed to avoid residential areas as far as possible and the volume of traffic is not unduly increased; and,
- Designing a facility which does not significantly impact on the adjacent metropolitan open land.
- Remediating the site of historical contamination
- No protected species and habitats have been recorded onsite. The following protected species and habitats have been sited in the vicinity of the site:
  - To the south of the site at 'Bonesgate Drake Road Open Space-Moor Lane' sightings of birds, a lizard, a bat and a stag beetle have been recorded
  - At the location given as "Bonesgate Cox lane" various bird species have been recorded.
  - To the south of the site, a common starling and a house sparrow were seen at post code KT9 2BW and to the south west of the site, at postcode KT9 1BY a frog, house sparrow, smooth newt, stagbeetle and west European hedgehog have been recorded.
  - At postcode KT9 1FX, a stagbeetle was sighted
  - At the location given as 'Hook,'(King Edward Rec), redwings have been sighted.

**Delivery:** There are opportunities for some waste management facility development in the second half of the plan period.

# SITES 641 / 651 / 652: THE DURNSFORD ROAD AND PLOUGH LANE INDUSTRIAL AREA

## Merton



### Site Description:

The site consists of two parts, to the north and south of Plough Lane and both industrial areas are at present in multiple use and multiple occupation. Buildings range between approximately 8m-20m high and there is a variety of occupants such as: a bus depot, Abel & Cole, Cappagh depot, Wickes, Vauxhall garage, Homebase, Booker Wholesale, Oddbins Depot, Tarmac batching plant and the BT fleet depot. Near the boundaries of the site

are the River Wandle, allotments, cemeteries, railway lines, residential properties, the Wimbledon Stadium and other industrial properties.

The northern part of the site gains direct access from the A218 (Durnsford Road) and the southern part of the site gains direct access from the B235 (Plough Lane).

**Site Area:** 25.55ha

**Proposals Map Designations:** Industrial Area, within the 1 in 100 year floodplain and an Archaeological Priority Zone, and the River Wandle on the western boundary is within MOL, a SINCR and a Green Corridor (Merton Adopted Unitary Development Plan, 2003)

**Site Constraints:** Limited opportunities for sustainable transport, adjacent to a Conservation area and Nature Conservation Area, and within a Flood Zone and a Local Archaeological Site.

**Site Opportunities:** The site is an established industrial area that is designated as a 'Strategic Industrial Location' in the London Plan and gains access from a nearby strategic road.

**Objections from Previous Consultations:**

Issue Raised	Action Taken
Potential loss of employment	Planning cannot control the number of jobs on any site, only the use of the site.
Air Pollution (including dust)	Policy WP7 strengthened, see paragraph 2 and point (e) particularly
Odour	Policy WP7 strengthened, see paragraph 2 and point (h) particularly
Noise	Policy WP7 strengthened, see paragraph 2 and point (f) particularly
Litter	Policy WP7 strengthened, see paragraph 2 and points (h) and (i) particularly
Loss of residential amenity (visual intrusion)	Policy WP7 strengthened, see paragraph 1 and point (i) particularly
Nearby residential area, school and hospital	Policy WP7 strengthened, see paragraph 1 and point (c) particularly
Traffic	Policy WP7 strengthened, see point (g) particularly
Safety and amenity of local cycle routes	Policy WP7 strengthened, see points (a), (g) and (i) particularly. Note other cycling related LDF policies would also apply.
Threat to the neighbouring nature conservation area and	Policy WP7 strengthened, see points (a), (b) and (d) particularly and note that the site area is limited to the

contamination of the River Wandle	previously developed area
Effect on neighbouring business viability	Policy WP7 strengthened, see paragraph 1 and point (i) particularly. Is in an established industrial area that is designated as a 'Strategic Industrial Location' in the London Plan
Located in Flood Zone	Policy WP7 strengthened, see point (d) particularly
Close to the future Wandle Valley Regional Park	Policy WP7 strengthened, see point (a) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Evaluating and preserving any archaeological remains;
- Minimising flood risk on- and off-site;
- Respecting buffer zones to the River Wandle, as advised by the Environment Agency;
- Remediating the site of historical contamination
- Developing a facility which could make heat and/or power available to local users
- No protected species and habitats have been recorded on site. The following protected species and habitats have been recorded within the vicinity of the site: Common Frog, Common Toad, Smooth Newt, Common Kingfisher, Common Linnet, Common Starling, Hedge Accentor, House Sparrow, Reed Bunting, Common Pipistrelle, stag beetle, slow-worm, Pipistrellus pipistrellus, Vespertilionidae, West European Hedgehog.

**Delivery:** At the time of writing, this site is in multiple ownership and multiple occupation. There are opportunities for some waste management facility development in the second half of the plan period.



## SITE 702: GARTH ROAD INDUSTRIAL AREA

Merton



**Site Description:** The site is part of a larger industrial area and at present, the site is a multi-use, multi-occupier industrial estate. Existing buildings on this site vary greatly from pre-war brick workshops to more modern steel clad warehouses and heights vary from approx 6-20m. The site borders the remainder of the industrial area along the northwestern boundary and residential properties along the northeastern and southern boundaries. Along the western and eastern boundaries are SINC's and Green Corridors with trees and vegetation, which screen the site from the residential properties beyond

From the A 24 to the south of the site, access is gained via Garth Road, which is a residential access road that bisects the site.

**Site Area:** 5.6ha

**Proposals Map Designations:** Industrial Area and the eastern part of the site is within the 1in100 year floodplain (Merton Adopted Unitary Development Plan, 2003)

**Site Constraints:** No direct access to the Strategic Road Network, limited opportunities for sustainable transport, adjacent to a Nature Conservation Area and within a Flood zone.

**Site Opportunities:** The site is an established industrial area.

**Objections from Previous Consultations:**

Issue Raised	Action Taken
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

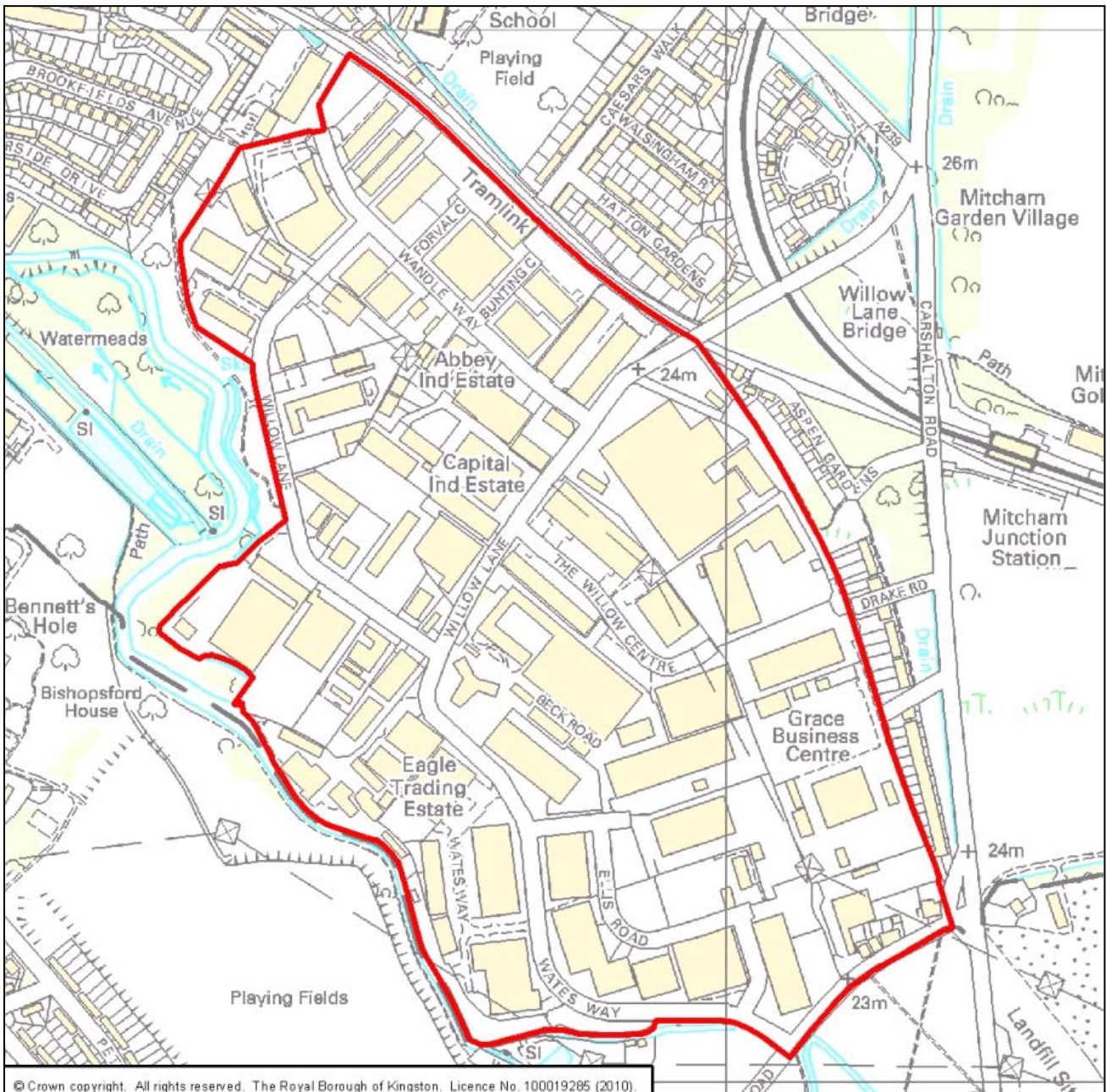
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Respecting buffer zones to the Pyl Brook, as advised by the Environment Agency;
- Minimising flood risk on- and off-site;
- Remediating the site of historical contamination
- Developing a facility which could make heat and/or power available to local users
- No protected species and habitats have been recorded on site. The following protected species and habitats have been recorded within the vicinity of the site:  
Common Linnet, Common Starling, Hedge Accentor, Herring Gull, House Sparrow, Reed Bunting, Sand Martin, Song Thrush, Slow-worm, Common Frog, Common Toad, Daubenton's Bat, Eurasian Badger, Lesser Noctule, Pipistrellus pipistrellus, Serotine, Soprano Pipistrelle, West European Hedgehog

**Delivery:** At the time of writing, this site is in multiple ownership and multiple occupation. There are opportunities for some waste management facility development in the second half of the plan period.



## SITE 69: WILLOW LANE INDUSTRIAL ESTATE

### Merton



**Site Description:** The site is a large multi-use and multi-occupier industrial estate with some existing waste management facilities. The River Wandle runs along the southern and western boundary of the site. There are some houses along the southeastern boundary but the houses near the northeastern boundary are separated from the site by a tramline. At the northern and southern ends of the site the neighbouring houses are separated from the site by a buffer strip of open land.

Road access is gained via the A237.



**Site Area:** 41.45ha

**Proposals Map Designations:** Industrial Area, Archaeological Priority Zone, the western part of the site is within the 1 in 100 year floodplain and both the River Wandle on the western boundary and Mitcham Common on the eastern boundary are MOL, SINCs, Green Chain and Green Corridors (Merton Adopted Unitary Development Plan, 2003). The site is designated as a 'Strategic Industrial Location' in the London Plan.

**Site Constraints:** Limited opportunities for sustainable transport, Local Archaeological Site, adjacent to a Nature Conservation Area and within a Flood zone.

**Site Opportunities:** The site takes access from a trunk road, is an established industrial area that is designated as a 'Strategic Industrial Location' in the London Plan and has numerous existing waste operators.

**Objections from Previous Consultations:**

Issue Raised	Action Taken
Potential loss of employment	Planning cannot control the number of jobs on any site, only the use of the site.
Located in Flood Zone	Policy WP7 strengthened, see point (d) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

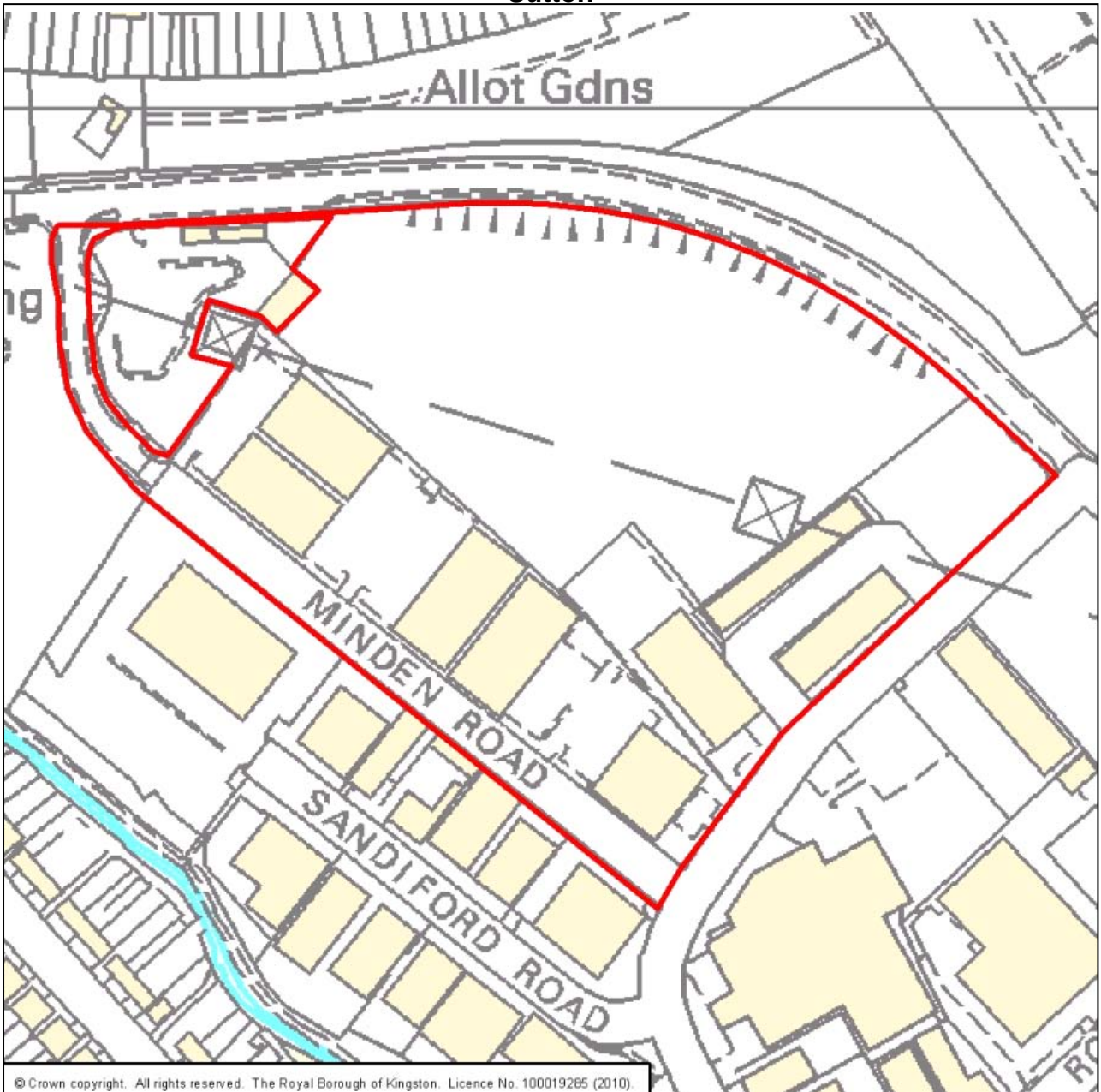
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Minimising flood risk on- and off-site;
- Respecting buffer zones to the River Wandle, as advised by the Environment Agency;
- Evaluating and preserving any archaeological remains;
- No protected species and habitats have been recorded on site. The following protected species and habitats have been recorded within the vicinity of the site:
  - To the north of the site at 'Canons, Madeira Road' the following bat species: Pipistrellus pipistrellus, Common Pipistrelle, Soprano Pipistrelle were recorded in 2008.
  - The House Sparrow sightings come from the 'LBP Sparrows at home survey 2002'.

- Records for Sand Lizards are for 1969 and comments provided are unclear on location.
- Data demonstrates a variety of bird species, amphibians, insects and a few plant varieties.

**Delivery:** At the time of writing, this site is in multiple ownership and multiple occupation. There are opportunities for some waste management facility development in the second half of the plan period.

**Site 491: PART OF THE KIMPTON INDUSTRIAL AREA**  
**Kimpton Park Way**

**Sutton**



**Area Description:** The area is part of a Strategic Industrial Area which is served by Kimpton Park Way and then the A217. There is a household recycling centre to the north west and the site is bounded by industrial uses to the south west and south east. To the north east, there is a newly created park, cemetery and open land. Residential properties are in relatively close proximity.

**Total Area Size:** 5.12ha.

**Proposals Map Designations:** Strategic Industrial Area.

**Constraints:** No direct access to the Strategic Road Network, near a local nature conservation area, limited opportunities to utilise sustainable transport modes and close to a residential area. The site lies above a Source Protection Zone 2 area. The site is therefore unlikely to be suitable for any waste-related proposal which contains or generates liquid waste, especially if hazardous.

**Opportunities:** Existing industrial area and close to an existing Household Recycling Centre.

**Objections from Previous Consultations:**

Principal Issues Raised	Action Taken
Incinerator would not be suitable	Policy WP7 strengthened, see point (g) particularly

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Demonstrating there is a need for the development;
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the amenity of those residential properties in the vicinity of the site;
- Ensuring that risks of pollution to groundwater are investigated and mitigated against, a full assessment of the risks will be needed at the pre-planning application stage, with full liaison with the Environment Agency. The purpose of this assessment would be to consider the inherent risks associated with the proposed waste activity and provide sufficient information to evaluate the likelihood of a release being made. Storage of waste prior to processing also poses a significant risk and will need to be considered at this pre-application stage;
- Ensuring that traffic flow is not unduly increased;
- Ensuring air emissions from the plant and the traffic generated are within acceptable levels;
- Ensuring increases in odour, litter, vermin or birds do not result from the development; and,
- Ensuring the development is appropriate in design terms with the surrounding area;
- Remediating the site of historical contamination;
- The following protected species and habitats have been recorded within the vicinity of the site: Common Frog, Common Linnet, Common Toad, Grape-hyacinth, Hedge Accentor, House Sparrow, Pipistrellus pipistrellus, Populus nigra subsp. betulifolia, Song Thrush, Soprano Pipistrelle, Stag Beetle.

**Delivery:** The area has been considered for waste management.

**SITE 1006: WANDLE VALLEY TRADING ESTATE**  
**Mill Green Road, Hackbridge**

Sutton



**Site Description:** The site lies on the northern edge of the Hackbridge Sustainable Suburb. The River Wandle runs adjacent to the site on the west. To the east, the site is adjacent to three listed buildings to the east and there is a Site of Importance for Nature Conservation to the south. It has three vehicular access points. It is currently occupied by a number of different businesses.

**Site Area:** 1.6ha.

**Proposals Map Designations:** Preferred Location for Industry, Archaeological Priority Area

**Constraints:** No direct access to the Strategic Road Network, near a local conservation area, near to a locally important nature conservation area, limited opportunities to utilise sustainable transport modes and within Flood Zone 2 mainly (also parts in 3a and 3b).

**Opportunities:** Established industrial area and close to an area identified for regeneration.

**Objections from Previous Consultations:**

<b>Principal Issues Raised</b>	<b>Action Taken</b>
Pollution	Policy WP7 strengthened, see points (e) and (f) particularly
Greenfield Site	The site area is limited to the previously developed area
Inconsistent with Sutton’s plan for a sustainable Hackbridge	Policy WP7 strengthened and proposals will also have to conform with the London Borough of Sutton’s forthcoming Hackbridge Masterplan SPD which will mitigate environmental concerns.
Loss of residential amenity	Policy WP7 strengthened, see paragraph 1 particularly
Close to the Wandle Trail	Policy WP7 strengthened, see point (a) particularly
Increase in traffic flow	Policy WP7 strengthened, see point (g) particularly
Loss of Biodiversity	Policy WP7 strengthened and site area is limited to the previously developed area
Already suffering from existing waste facilities and landfill	Policy WP7 strengthened, see paragraph 2 particularly
Effect on property values	Policy WP7 strengthened
Located in Flood Zone 3	Environment Agency has reclassified the site and it is now mostly in Zone 2

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

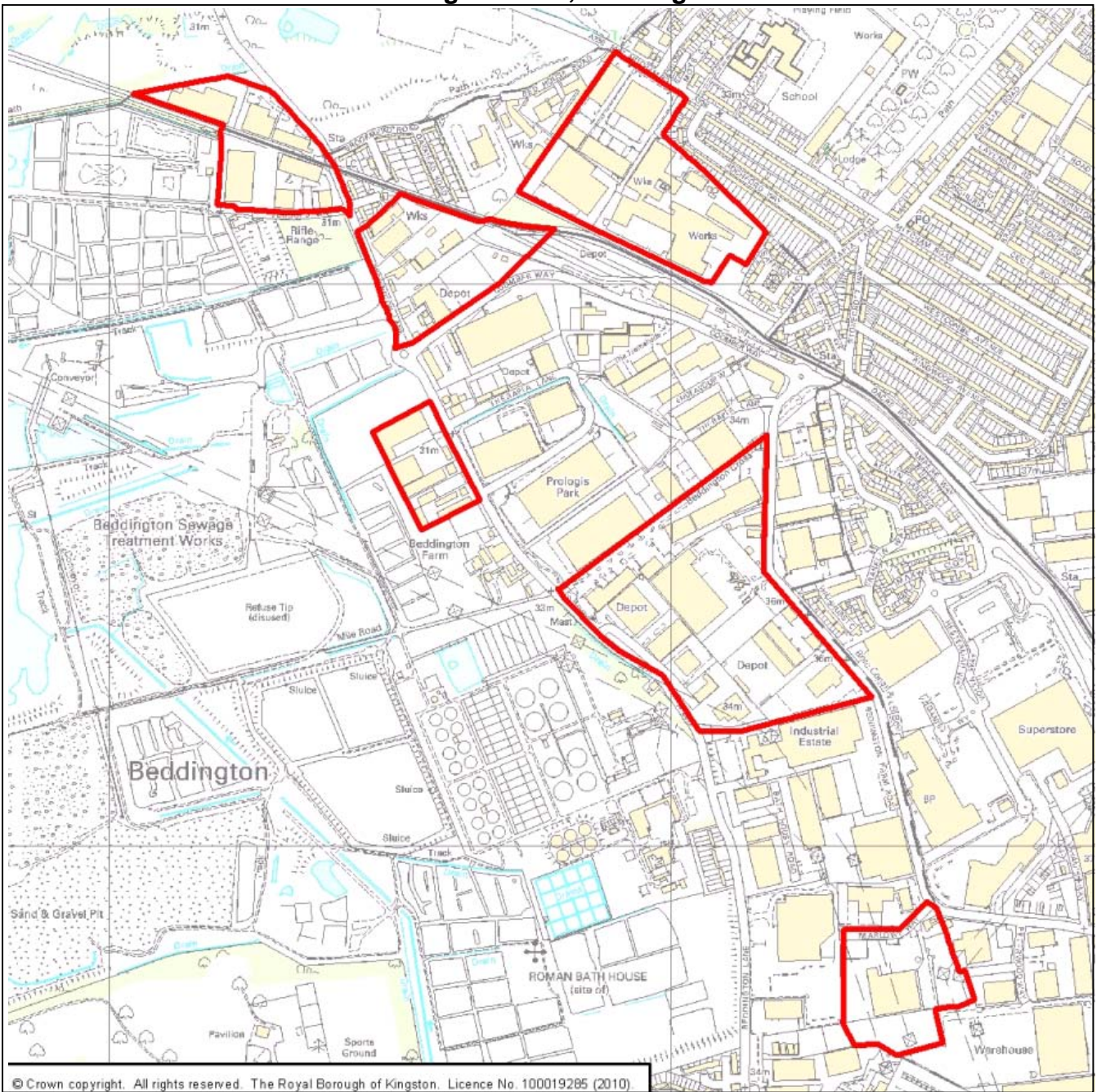
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Respecting the special character of the surrounding listed buildings;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads;
- Improving public access to the River Wandle;
- Respecting buffer zones to the River Wandle, as advised by the Environment Agency;
- Respecting and enhancing the adjacent nature conservation area;
- Minimising flood risk on- and off-site;

- Remediating the site of any contamination; and,
- Developing a facility which could make heat and/or power available to local users in the Hackbridge Sustainable Suburb area.
- Remediating the site of historical contamination;
- The following protected species and habitats have been recorded within the vicinity of the site: Chamomile, Common Bullfinch, Common Frog, Common Kingfisher, Common Starling, Crescent, Daubenton's Bat, Hedge Accentor, House Sparrow, Lesser Spotted Woodpecker, Mottled Rustic, Noctule Bat, Palmate Newt, Pipistrellus, Pipistrellus pipistrellus, Redwing, Reed Bunting, Rosy Rustic, Sand Lizard, Rustic, Sky Lark, Slow-worm, Smooth Newt, Song Thrush, Soprano Pipistrelle, Stag Beetle, Vespertilionidae, West European Hedgehog

**Delivery:** The site owner has expressed an interest in developing the site.



**PART OF THE BEDDINGTON INDUSTRIAL AREA**  
**Beddington Lane, Beddington**



**Area Description:** A small part of the Beddington Industrial Area may be suitable for the development of waste management facilities. In the Stage 2 'Potential Sites and Policies' consultation document, the area was divided into various zones. The outlined zones on the map above denote those zones within the industrial area considered most suitable in light of the Preferred Sites Technical Report. It does not imply that all these areas will be developed for waste management facilities. The industrial area lies between Beddington Lane and Purley Way (A23) and is occupied primarily by B1, B2 and B8 uses. However, the industrial area also includes a large supermarket and is adjacent to residential areas so some areas

of the Beddington Industrial Area are more suitable for waste management facility development than others. The area is already the base for a high traffic generating uses, such as other waste management facilities and logistics operations.

**Total Area Size:** 40.38ha.

**Proposals Map Designations:** Strategic Industrial Location, Archaeological Priority Area

**Constraints:** Near to a local nature conservation area, limited opportunities for sustainable transport and a locally protected view.

**Opportunities:** Existing industrial area and close to the Strategic Road Network.

**Objections from Previous Consultations:**

<b>Principal Issues Raised</b>	<b>Action Taken</b>
Loss on residential amenity	Policy WP7 strengthened, see paragraph 1 particularly
The site is near a school	Policy WP7 strengthened, see point (c) particularly
Effect on tram stop passengers	Policy WP7 strengthened, see paragraph 1 particularly
Increase in traffic flow generally	Policy WP7 strengthened, see point (g) particularly
Increase in traffic flow in Beddington Village and the Conservation Area	Policy WP7 strengthened, see point (g) particularly
Increase in odour	Policy WP& strengthened, see point (h) particularly
Impact on air quality	Policy WP7 strengthened, see point (e) particularly
Increase in surface water run-off	Policy WP7 strengthened, see point (d) particularly
Effect on retail uses within the Strategic Industrial Areas	Policy WP7 strengthened, see paragraph 1, particularly
Accumulation of waste facilities in the Beddington Lane area	Reference in Policy 3C.2 of to London Plan and Policy 6.3 of the Draft Replacement London Plan

**Issues to consider:**

Developers of the site for waste management purposes should pay particular attention to the following (please note this list is not exhaustive):

- Demonstrating there is a need for the development;
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties in the vicinity of the site and ensuring sensitive receptors, such as schools, are not affected by the development
- Ensuring that traffic to and from the site is routed to avoid sensitive receptors and residential properties as far as possible and traffic flow is not unduly increased;

- Ensuring air emissions from the plant and the traffic generated are within acceptable levels;
- Ensuring increases in odour, litter, vermin or birds do not result from the development; and,
- Ensuring the development is appropriate in design terms with the surrounding area.
- Remediating the site of historical contamination;
- No protected species and habitats have been recorded onsite. The following protected species and habitats have been recorded within the vicinity of the sites: Common Starling, Eurasian Tree Sparrow, Hedge Accentor, House Sparrow, Peregrine Falcon, Noctule Bat, Pipistrellus, Serotine, Stag Beetle, West European Hedgehog, Sky Lark

**Delivery:** There are opportunities for some waste management facility development in the second half of the plan period.

## **Appendix 1: The Evidence Base**

A wide range of reports and studies form the South London Waste Plan's evidence base. These include the list below.

All are available online at <http://southlondonwasteplan.limehouse.co.uk>, in boroughs' main libraries and Council main receptions during the Publication period.

- Evidence Base Study 1: The Sequential Test
- Evidence Base Study 2: Source Protection Zones
- Evidence Base Study 3: The Deliverability Report
- Evidence Base Study 4: The Technical Report (together with previous iterations of the Technical Report)
- Evidence Base Study 5: Environmental Health Considerations
- Evidence Base Study 6: Traffic Considerations
- Evidence Base Study 7: Nature conservation considerations
- The Habitats Directive Assessment
- The Sustainability Appraisal



Ref:  
[For official use only]

## The South London Waste Plan: Proposed Submission Development Plan Document (DPD)

Publication Stage Representation Form

Please submit your response online at:

<http://southlondonwasteplan.limehouse.co.uk>

or return the representation form by email, fax or post:

Email: [southlondonwasteplan@rbk.kingston.gov.uk](mailto:southlondonwasteplan@rbk.kingston.gov.uk)

Fax: 020 8547 5363

Post: The Project Manager, The South London Waste Plan, The Royal Borough of Kingston Upon Thames, High Street, Kingston Upon Thames, KT1 1EU

For further information or to request extra forms:

Visit our website at <http://southlondonwasteplan.limehouse.co.uk>

Email: [southlondonwasteplan@rbk.kingston.gov.uk](mailto:southlondonwasteplan@rbk.kingston.gov.uk)

Responses must be received at the Council Offices no later than **midnight on Monday 14<sup>th</sup> January. Representations after this date will not be accepted.**

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Where possible, the partner boroughs would prefer if you submitted your response using our online consultation system. This enables faster analysis of responses, reduces the time in data entry and is more environmentally friendly.



**South London Waste Plan:  
Proposed Submission  
Publication Stage  
Representation Form**

Ref:

**(For official use only)**

Name of the DPD to which this representation relates:

**SOUTH  
LONDON  
WASTE  
PLAN:  
PROPOSED  
SUBMISSION**

**Please return to THE ROYAL BOROUGH OF KINGSTON UPON THAMES BY MIDNIGHT on  
MONDAY 14 FEBRUARY 2010**

This form has two parts –  
Part A – Personal Details  
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details\***

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

**2. Agent's  
Details (if  
applicable)**

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>



**Part B – Please use a separate sheet for each representation**

Name or Organisation :

3. To which part of the Waste Plan does this representation relate?

Paragraph

Policy

Site Map

4. Do you consider the Waste Plan is:

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Qu 6.

5. Do you consider the Waste Plan is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Waste Plan, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Waste Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Waste Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**



8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Do you wish to be notified at a specified address (Part A) of any of the following:

- (i) that the South London Waste Plan has been submitted for independent examination
- (ii) the publication of the recommendations of any person appointed to carry out an independent examination of the South London Waste Plan.
- (iii) the adoption of the South London Waste Plan.

Signature:

Date:

For Official Use Only	
Respondent No:	
Rep No:	
Received:	

## Notes to Accompany Representation Form for the South London Waste Plan

### 1. Introduction

1.1 The South London Waste Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the submitted Waste Plan, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004<sup>1</sup> (the 2004 Act) states that the purpose of the examination is to consider whether the DPD complies with the legal requirements and is 'sound'.

- If you are seeking to make representations on the **way** in which the Local Planning Authority has prepared the South London Waste Plan it is likely that your comments or objections will relate to a matter of **legal compliance**.
- If it is the **actual content** on which you wish to comment or object it is likely it will relate to whether the South London Waste Plan is **justified, effective or consistent with national policy**.

### 2. Legal Compliance

2.1 The Inspector will first check that the Waste Plan meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The South London Waste Plan should be within the partner boroughs' current Local Development Scheme (LDS) and the key stages should have been

followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the South London Waste Plan is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at their main offices.

- The process of community involvement for the South London Waste Plan in question should be in general accordance with the LPA's Statement of Community Involvement (where one exists). The Statement of Community Involvement (SCI) is a document which sets out a LPA's strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications.
- The South London Waste Plan should comply with the Town and County Planning (Local Development) (England Regulations) 2004 as amended<sup>2</sup>. On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify the relevant bodies (as set out in the regulations) and any persons who have requested to be notified.

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<sup>1</sup> View at [http://www.opsi.gov.uk/ACTS/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1)

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<sup>2</sup> View at <http://www.opsi.gov.uk/si/si2004/20042204.htm> (2004 regulations) and [http://www.opsi.gov.uk/si/si2008/pdf/uksi\\_20081371\\_en.pdf](http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf) (2008 amending regulations)

- The LPA is required to provide a Sustainability Appraisal Report when they publish the South London Waste Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The South London Waste Plan should have regard to national policy and conform generally to the Regional Spatial Strategy (RSS). The RSS sets out the region's policies in relation to the development and use of land and forms part of the development plan for LPAs. In London it is called the Spatial Development Strategy.
- The South London Waste Plan must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). The SCS is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the LPA's area. The SCS is subject to consultation but not to an independent examination.

### 3. Soundness

3.1 To be sound, the South London Waste Plan should be:

- **Justified**

This means that the South London Waste Plan should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area

- Research/fact finding: the choices made in the plan are backed up by facts

The South London Waste Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- **Effective**

This means the South London Waste Plan should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The South London Waste Plan should also be flexible and able to be monitored.

The South London Waste Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the South London Waste Plan should make clear that major changes may require a formal review including public consultation.

Any measures which the LPA has included to make sure that targets are

met should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the South London Waste Plan needs amendment.

- **Consistent with national policy**

The South London Waste Plan should be consistent with national policy. Where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

3.2 If you think the content of a South London Waste Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy or in the Regional Spatial Strategy (or the Spatial Development Strategy in London)? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Development Plan Document within the LPA's Local Development Framework (LDF). There is no need for repetition between documents in the LDF.

- If the policy is not covered elsewhere, in what way is the Waste Plan unsound without the policy?
- If the Waste Plan is unsound without the policy, what should the policy say?

#### 4. General advice

4.1 If you wish to make a representation seeking a change to South London Waste Plan or any part of it, you should make clear in what way the Plan or part of it is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the Plan should be changed. It will be helpful if you also say precisely how you think the Plan should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2 Where there are groups who share a common view on how they wish to see the South London Waste Plan changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.3 Further detailed guidance on the preparation, publication and examination of Development Plan

Document in general is provided in *Planning Policy Statement 12: Local Spatial Planning*<sup>3</sup> and in *The Plan Making Manual*<sup>4</sup>

## **5. Other Issues**

5.1 Where possible, the Council would prefer if you submitted your response using our online consultation system at <http://southlondonwasteplan.limehouse.co.uk>. This enables faster analysis of responses, reduces the time in data entry and is more environmentally friendly.

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<sup>3</sup> View at <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

<sup>4</sup> View at <http://www.pas.gov.uk/pas/core/page.do?pagelid=51391>