4 Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

Establishing the Policy Context

4.1 A comprehensive review of all international, national, regional and local policies, plans and programmes relevant to the South London Waste Plan has been undertaken in order to identify key sustainability objectives for the purpose of SA/SEA and the implications of each of these documents on the emerging Plan.

4.2 This Section provides an overview of the policy context within which the South London Waste Plan is being prepared and identifies the main sustainability development themes that the Plan will need to address. Full details of the review findings are set out in the form of an SA Scoping Table included as Appendix 4.

International Context

Landfill Directive

4.3 The Landfill Directive 1999/31/EC requires all Member states to significantly reduce the amount of biodegradable municipal waste landfilled and set the following targets:
- by 2010 to reduce the biodegradable municipal waste disposed to landfill to 75% of that produced in 1995;
- by 2013 to reduce the biodegradable municipal waste disposed to landfill to 50% of that produced in 1995; and
- by 2020 to reduce the biodegradable municipal waste disposed to landfill to 35% of that produced in 1995.

Waste Electrical and Electronic Equipment Directive

4.4 The Waste Electrical and Electronic Equipment Directive 2002/96/EC (or ‘WEEE’ Directive) seeks to address the increasingly rapid growth of waste electrical and electronic equipment and sets out measures to promote the re-use, recycling and recovery of such wastes in order to reduce the need for disposal.

National Context

National Waste Strategy

4.5 National Waste Strategy 2007, which replaces the previous Waste Strategy 2000, seeks to:
- decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use;
- meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste (BMW) in 2010, 2013 and 2020;
- increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste;
- secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste;
- get the most environmental benefit from that investment through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.

4.6 The revised Strategy sets out a range of targets for England and Wales which are based on application of the following waste hierarchy.
4.7 The targets for municipal waste (MSW) recovery are:
- 53% by 2010;
- 67% by 2015; and
- 75% by 2020.

4.8 The targets for household waste recycling or composting are:
- 40% by 2010;
- 45% by 2015; and
- 50% by 2020.

4.9 The targets for reducing the amount of residual waste produced (i.e. waste not re-used, composted or recycled) compared to 2000 levels are:
- reduce the amount of residual waste by 29% by 2010;
- reduce the amount of residual waste by 35% by 2015; and
- reduce the amount of residual waste by 45% by 2020.

**Waste and Emissions Trading Act (WET Act)**

4.10 The Waste and Emissions Trading (WET) Act 2003 allows the Government to put restrictions on the amount of biodegradable municipal waste (BMW) that can be sent to landfill by each Waste Disposal Authority (WDA). The Act is implemented in England through the Landfill Allowance Trading Scheme (LATS).

4.11 Each WDA has been allocated a maximum allowance of BMW that it is permitted to be disposed of to landfill in each year between 1 April 2005 and 2020. Failure to achieve these minimum diversion rates will result in financial costs if the purchase of extra permits is needed. Conversely, surpassing these targets will result in financial benefits through selling if excess permits.

4.12 Figure 4.1 details the LATS allocations for each of the four South London Boroughs.

**Table 4.1: Landfill Allowance Trading Scheme (LATS) allocations for Sth London Boroughs**

<table>
<thead>
<tr>
<th>Borough</th>
<th>Borough Allocation 2006-07</th>
<th>Target (BMW) 2010</th>
<th>Target (BMW) 2013</th>
<th>Target (BMW) 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kingston</td>
<td>43,010</td>
<td>31,430</td>
<td>20,934</td>
<td>14,648</td>
</tr>
<tr>
<td>Croydon</td>
<td>111,649</td>
<td>75,700</td>
<td>50,421</td>
<td>35,282</td>
</tr>
<tr>
<td>Merton</td>
<td>53,739</td>
<td>38,930</td>
<td>25,930</td>
<td>18,144</td>
</tr>
<tr>
<td>Sutton</td>
<td>47,155</td>
<td>35,665</td>
<td>23,756</td>
<td>16,623</td>
</tr>
<tr>
<td>South London Total</td>
<td>255,553</td>
<td>181,725</td>
<td>121,041</td>
<td>84,697</td>
</tr>
</tbody>
</table>
Landfill Regulations 2002

4.13 Since July 2004, the co-disposal of hazardous wastes with other waste streams has been made illegal, resulting in hazardous waste only being accepted at specialist sites. The Landfill Regulations 2002 have resulted in a significant reduction in the capacity of landfill sites for hazardous waste from 240 sites to fewer to than 15 across the country and the cost of disposal has risen as a result.

Best Value Performance Indicators (BVPI)

4.14 BVPI targets for household waste recycling and composting (BV82a and BV82b) are set out below in Figure 4.2. National Waste Strategy 2007 suggests an increase in the recycling and diversion targets that will inevitably impact on future BVPI standards.

Table 4.2: Borough Recycling and Composting Targets

<table>
<thead>
<tr>
<th>Borough</th>
<th>Borough recycling and Composting Target 2007-08 (BV82a and BV82b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kingston</td>
<td>30%</td>
</tr>
<tr>
<td>Croydon</td>
<td>30%</td>
</tr>
<tr>
<td>Merton</td>
<td>27%</td>
</tr>
<tr>
<td>Sutton</td>
<td>33%</td>
</tr>
</tbody>
</table>

PPS1 on ‘Delivering Sustainable Development’ (2005)

4.15 The Government’s objectives for planning and sustainable development are set out in PPS1, which puts forward overarching planning policies on the delivery of sustainable development through the planning system and aims to ensure a better quality of life for everyone, now and for future generations. Planning for sustainable development should address issues of:

- making suitable land available for development to meet economic, social and environmental objectives;
- protecting and enhancing the natural and historic environment and the quality and character of the countryside and successful communities;
- ensuring high quality development through good and inclusive design and efficient use of resources; and
- ensuring that development contributes to the creation of mixed communities with good access to jobs and services for all.

Supplement to PPS1 on ‘Planning and Climate Change’ (2007)

4.16 PPS on ‘Planning and Climate Change’ (2007) sets out how spatial planning in providing for new homes, jobs and infrastructure, should help shape places with lower carbon emissions and resilient to climate change. Furthermore, this draft PPS sets out how spatial planning should contribute to reducing emissions and stabilising climate change (mitigation) and take into account the unavoidable consequences (adaptation). In particular, this draft PPS states that all planning authorities should prepare and deliver spatial strategies that:

- secure the highest viable standards of resource and energy efficiency and reduction in carbon emissions;
- deliver patterns of urban growth that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking and, overall, reduce the need to travel, especially by car;
- sustain biodiversity, and in doing so recognise that the distribution of habitats and species will be affected by climate change; and
- reflect the development needs and interests of communities and enable them to contribute effectively to tackling climate change.
PPS10 on ‘Planning for Sustainable Waste Management’

4.17 The key planning objectives of PPS10 are to:
- help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option;
- provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities;
- help implement the national waste strategy, and supporting targets, are consistent with obligations required under European legislation and support and complement other guidance and legal controls such as those set out in the Waste Management Licensing Regulations 1994;
- help secure the recovery or disposal of waste without endangering human health and without harming the environment and enable waste to be disposed of in one of the nearest appropriate installations;
- reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness;
- protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed greenbelt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining planning permission; and
- ensure the design and layout of new development supports sustainable waste management.

London Context

Mayor’s Municipal Waste Management Strategy

4.18 The Mayor’s Municipal Waste Management Strategy (September 2003) included proposals and policies for implementing the National Waste Strategy (Waste Strategy 2000 for England and Wales) within London, and meet waste recycling and recovery targets. Waste collection and disposal authorities in London must pay due regard to the Mayor’s Municipal Waste Management Strategy. The Mayor also calls for greater regional self-sufficiency, emphasising the need for more waste treatment and disposal facilities to be built in London, and setting the following key aspirational targets:
- recycling target for municipal waste by 50% by 2010; and
- recycling target for municipal waste by 60% by 2015.

London Plan

4.19 The Mayor’s London Plan5 (February 2008) sets an overall target for the capital to become 85% self-sufficient in managing its own waste by 2020. To achieve this target, the London Plan specifies tonnages of municipal, commercial and industrial waste which all London Boroughs must manage in future years. This is known as the ‘apportionment’ and represents a proportion of the waste which is anticipated to arise in future. The pooled apportionment for the South London Waste Plan area, for example, represents 97% of the municipal, commercial and industrial waste which is anticipated to arise within the 4 Boroughs in 2021.

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5 consolidated London Plan incorporating Further Alterations
4.20 Policy 4A.25 of the London Plan states that “Boroughs in their DPDs should identify sufficient land to provide capacity to manage the apportioned tonnages of waste …Boroughs preparing joint waste DPDs may wish to collaborate by pooling their apportionment requirements”. It is not necessary for Boroughs to meet both the municipal and commercial/industrial waste apportionment figures individually, provided the aggregated total apportionment figure is met, although Boroughs are urged to achieve a maximum level of self-sufficiency. An assessment of the range of facilities that might be provided to deliver this capacity [for commercial/industrial and MSW waste at 2020] shows that the range of new facilities likely to be needed to meet self-sufficiency targets for the management of London’s municipal and commercial/industrial waste in 2020 are 64% MRF, 8% composting; 15% MBT; 3% AD and 10% gasification/pyrolysis.

4.21 The London Plan sets out the following targets for recycling MSW:
- by 2010: Boroughs to recycle or compost at least 35% of municipal waste;
- by 2015: Boroughs to recycle or compost at least 45% of municipal waste.

4.22 With regard to sites, the London Plan states that DPD policies should:
- safeguard all existing waste management sites (unless appropriate compensatory provision is made) (Policy 4A.24);
- require, where feasible, the re-use of surplus waste transfer station sites for other waste uses (Policy 4A.24);
- identify new sites in suitable locations for new recycling and waste treatment facilities such as MRFs, waste reuse and recycling centres, construction and demolition waste recycling plants and closed vessel composting;
- require the provision of suitable waste and recycling storage facilities in all new developments;
- support appropriate developments for manufacturing related to recycled waste;
- support treatment facilities to recover value from residual waste;
- where waste cannot be dealt with locally, promote waste facilities that have good access to rail transport or the Blue Ribbon Network;
- safeguard all waste sites, including wharfs with an existing or future potential for waste management and ensure that adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance.

4.23 The London Plan goes on to state that “Where waste cannot be recycled, the Mayor will encourage the production of energy from waste using new and emerging technologies, especially where the products of waste treatment could be used as fuels (e.g. biofuels and hydrogen)….in preference to any increase in conventional incineration capacity...The Mayor will work in partnership…..to minimise the amount of energy used, and transport impacts from, the collection, treatments and disposal of waste in line with the Mayor’s target of reducing CO₂ emissions…promote generation of renewable energy and renewable hydrogen from waste.”

4.24 The London Plan states that, wherever possible, opportunities should be taken to include provision for Combined Heat and Power (CHP) and Combined Cooling Heat and Power (CCHP) and to accommodate various related facilities on a single site.

4.25 Policy 4A.22 requires DPDs to support appropriate developments for manufacturing related to recycled waste.
Sub-Regional Context

South London Sub-Regional Development Framework

4.26 The South London Sub-Regional Development Framework (SRDF) (2006) was approved in consultation with key stakeholders across South London, including the South London Partnership and the four SLWP Boroughs, to provide further guidance on the delivery of the Mayor’s priorities for the South London sub-region.

4.27 Action 1F (point ii) states that “Stakeholders should work collaboratively towards identifying and safeguarding land and sites for an appropriate range of recycling and waste treatment facilities in suitable locations across the sub-region to provide sufficient capacity to meet London’s 85% self-sufficiency target”.

South London Partnership

4.28 All Councils within the South London Waste Plan area have committed to the formation of the South London Waste Partnership. This Partnership is responsible for procuring waste disposal contracts, to enable the Partnership to:

- maximise diversion of Biodegradable Municipal Waste from landfill;
- achieve diversion targets of the Landfill Allowance Trading Scheme;
- achieve statutory targets for recycling and composting; and
- establish shared infrastructure within the region.

4.29 All boroughs are both waste collection and disposal authorities. Each has a waste management strategy (MWMS) which guides the development of their services and identifies targets for recycling and composting. A Joint Municipal Waste Management Strategy is in development. The boroughs’ MWMSs also identify activities to encourage waste minimisation. Waste Minimisation is at the top of the waste management hierarchy and although the Joint Waste Development Plan Document is limited in its ability to influence waste minimisation, it is important that the evidence base of the Plan considers the efforts being made to reduce waste within the Plans’ area. Waste minimisation activities will influence the predicted growth rates of municipal and commercial waste arisings within the boroughs and monitoring of the success of these activities will be an important aspect of the Joint Waste DPD monitoring regime.

Local Context

Municipal Waste Management Strategies


4.30 Waste minimisation is central to Croydon’s waste policy, with two of the Waste and Recycling Plan 2008-11 objectives being to, “reduce the growth of waste in Croydon,” and,” to improve promotion and raise waste awareness,” Croydon’s overarching recycling target is to recycle or compost 40% of its municipal waste by 2010.

Kingston-upon Thames: Municipal Waste Management Strategy, August 2004

4.31 Kingston’s MWMS and its annual Implementation Plans have a strong focus on waste minimisation. One of the five objectives of Kingston’s MWMS is to develop and deliver of a comprehensive waste awareness and waste minimisation programme encompassing a wide ranging communication strategy engaging with all of Kingston’s residents. One of Kingston’s key policies is to achieve a recycling and composting rate of 47% by 2020.


4.32 The first objective of Sutton’s MWMS is to reduce waste growth by raising
awareness of waste issues and the importance of waste reduction in order to slow
the future growth in waste arisings. Sutton Council has agreed an overall target of
recycling or composting 40% of its municipal waste by 2010.


4.33 The first Objective in Merton’s MWMS is to reduce waste growth through a
programme of education and engagement with the local community and continued
lobbying at a regional and national level to highlight producer responsibility. The
borough’s has a recycling target of 29% by 2009 is stated in their latest MWMS
Implementation Plan (July 2006 – August 2008).

**Unitary Development Plans and Local Development Frameworks**

*LB Croydon UDP: The Croydon Plan (July 2006)*

4.34 Croydon’s core UDP policy, from which all other policies in the Plan directly flow, is
that development in Croydon is expected to be sustainable (Policy SP1). This is
demonstrated in Environmental Protection Policy SP13, which seeks to minimise
the energy requirements of new development and will expect the use of renewable
energy technologies and sustainable materials. It is further demonstrated in
Environmental Protection Policy SP11 in which the Council will use development
opportunities to secure the objectives of the waste hierarchy and the
proximity/regional self sufficiency principle.

4.35 In order to meet future needs of the Borough Policy EP8 of the Croydon Plan
provides scope for the development of waste management facilities in a range of
locations across the Borough, including Strategic Employment Locations,
Employment Areas, existing industrial and warehousing sites and existing waste
management facilities, provided that the proposal meets a number of criteria,
including sustainable transport opportunities to and from the site.

4.36 The Policy also particularly encourages waste management facilities that minimise
the quantity of waste requiring disposal by landfill and maximise waste recovery.

4.37 In addition, Policy EP9 protects appropriately located existing waste management
facilities, to guard against the loss of this resource.

*LB Croydon Local Development Framework*

4.38 Croydon has not yet started consulting on the development of its Core Strategy.
Instead, Croydon’s first LDF document in development is the Croydon Metropolitan
Centre Area Action Plan, which is open for Issues and Options stage consultation
until the end of March 2008. This Plan identifies the Centre as an “opportunity
area” for providing more employment and also several thousand new homes. The
Centre is also the preferred location for new retail development and other facilities
and services aimed at serving a wide area of South London.

*Royal Borough of Kingston-upon-Thames: UDP (August 2005)*

4.39 Provides policies to govern waste management development in the borough.
Overarching strategic policy STR10 encourages sustainable methods of minerals
transportation, waste disposal and transportation, energy generation and use.

4.40 This policy echoes national and regional policy which requires waste treatment
development to drive waste up the hierarchy. To this end, the Council’s UDP
encourages the appropriate development of recycling and composting facilities
(Policy MW1) and encourages opportunities for energy recovery from waste
treatment plants (Policy MW4). The UDP encourages waste to be managed as
near as possible to its place of production, to minimise the environmental impacts of transportation (Policy MW2), echoing the London Plan’s proximity principles.

4.41 The UDP does not identify sites for waste management development, aside from the waste transfer station site at Villiers Road, which is in existing waste management use. The UDP does, however, state some constraints on the siting of new facilities, in that apart from composting facilities, new waste management facilities will not be permitted in green belt, metropolitan open land and areas of local open space (Policy MW1).

Royal Borough of Kingston-upon-Thames: Local Development Framework

4.42 Kingston has not yet consulted on its Core Strategy. Its first LDF document is the Kingston Town Centre Area Action Plan, K+ 20. This has been through the Examination In Public and Kingston is awaiting the Inspector’s binding report. The Submitted Plan incorporates proposals for key areas for change and conservation and involves policies to redevelop significant areas of the town centre.

LB Merton: UDP (October 2003)

4.43 Policy PE.9 of Merton’s UDP seeks to ensure that major new industrial, commercial and retail developments minimise their waste arisings in line with the waste hierarchy and dispose of it in a sustainable manner. These developments will be encouraged to adopt environmental management schemes for the treatment and disposal of waste and planning obligations may be sought in respect of these where appropriate. To facilitate the collection of recyclables, Policy PE.11 expects new residential, retail, leisure and business developments to provide recycling collection facilities.

4.44 Merton’s Proposals Map identifies two sites suitable for the development of waste treatment facilities at Benedicts Wharf, Mitcham and Garth Road Depot.

Merton’s Local Development Framework

4.45 Regarding the development of their LDF, Merton Council consulted on their Core Strategy and Development Control policies Preferred Options Core Strategy in June and July 2007 and anticipate Submission of their Core Strategy in June 2009. Merton’s Spatial Vision is for “an attractive, thriving, safe, diverse, sustainable Borough”. The application of the waste hierarchy where waste is minimised, reused and recycled and residual waste is disposed of sustainably in the right location using the most appropriate means, is one objective to help deliver this vision. Merton’s Preferred Core Strategy seeks to strengthen climate change policies through requirements for residential and commercial development to deliver a proportion (normally 10%) of their energy from on-site renewable sources. Extracting energy from waste using environmentally friendly technologies is well supported in the Preferred Core Strategy.

4.46 With specific regard to waste, the Preferred Core Strategy states that Merton is working with the adjoining boroughs of Croydon, Sutton and Kingston to prepare a joint waste plan. Policy 12 (Manage Waste), states that Merton will meet the tonnages required by the

4.47 London Plan, thereby progressing self-sufficiency whilst promoting sustainable waste management that encourages facilities that deal with waste as a resource. It further states that adequate sites (not only in Merton) will be identified to deal with the municipal waste stream and commercial and industrial waste streams in collaboration with the neighbouring boroughs of Croydon, Kingston and Sutton.
4.48 The Strategy has identified that the alternative option would be for Merton to prepare its own waste plan, but further states that Merton Council has rejected this option as it would mean losing the advantages of collaboration such as shared costs in producing the plan, shared costs in operating sites and facilities and would restrict the number of sites that could be considered for waste usage.

4.49 With regard to sites, the Preferred Core Strategy acknowledges that recycling, waste processing and transfer and construction and demolition businesses will increase their demand for employment land within the borough. The consultation document further states that due to their potential environmental impacts on their immediate neighbours – noise, smells, transport movements, night-time operations, these industries cannot locate in or near town centres or residential areas and will be encouraged towards the designated Employment Areas, Industrial areas. Sites currently in waste use will be protected. Policy 14 of the Preferred Core Strategy (Business Excellence in Merton), seeks to promote a robust and diverse local economy by increasing the square metres of employment floorspace available, including capacity for waste transfer and processing. The Preferred Options also state that there is a potential requirement of up to 10ha of commercial floorspace required specifically for waste processing and transfer that may be required between the boroughs of Croydon, Kingston Sutton and Merton, which will be considered through a Joint Waste DPD.

4.50 Regarding development which may impact on construction and demolition waste arisings, the Preferred Core Strategy identifies significant redevelopment for the town centres of Mitcham and Morden. Policies will support high quality development, improved public open spaces, transport routes and developing opportunities to install more efficient energy supplies.

**LB Sutton UDP (April 2003)**

4.51 Regarding the siting of waste-related development, Sutton’s UDP encourages these to be located within contaminated or previously developed derelict sites, or on sites which already have planning permission for a complementary waste facility (Policy PNR20). This policy also gives preference to sites which have good access to the strategic rail network and encourage sites to have good access to the strategic road network. Regarding treatment technologies, Sutton’s UDP opposes proposals for a waste to energy plant at their Beddington Tip site, which is currently in waste management use.

**LB Sutton: Local Development Framework**

4.52 Sutton has consulted on the preferred options for their Core Strategy and anticipates submission of their Core Strategy in September 2008. Reducing waste, promoting sustainable waste management and recycling are identified as actions by which Sutton will achieve environmental sustainability, promoted under Preferred Core Policy CP7 (One Planet Living).

4.53 The Preferred Core Strategy states that the Council has set an ambitious target of 85% selfsufficiency by 2020 and that detailed policies about how to achieve this will be set out in a Joint Waste DPD to be prepared by Sutton and its partner South West London authorities.

4.54 Preferred Core Policy CP8 (Waste Reduction and Management) states that the Council will manage its waste in a sustainable manner and will identify the necessary capacity and develop facilities in collaboration with London Boroughs of
Kingston-upon-Thames, Croydon and Merton, to meet the Mayor’s target of 85% self sufficiency across all waste streams, the Mayor’s waste apportionment figures and to meet the Mayor’s minimum targets for recycling, recovery and re-use.

4.55 Policy CP8 states that the Joint Waste DPD will safeguard existing waste management sites, unless compensatory provision is made, and allocate additional land within strategic industrial locations for future waste management facilities to meet the joint needs of the Joint Waste DPD area.

4.56 The Preferred Core Strategy highlights that the only realistic alternative option to developing a Joint waste Plan Core Policy would be for the Council to manage its waste independently of the three other South West London Boroughs. However, the Strategy identifies that collaboration provides much opportunity to manage the Borough’s waste in a sustainable manner.

4.57 In terms of sites, the Preferred Core Strategy identifies Beddington (108ha) and Kimpton (21ha) strategic industrial locations as appropriate locations for waste management uses.

4.58 The Strategy also identifies a need for more land designated for employment uses and proposes the extension of employment land at the Beddington Strategic Industrial Location on 10ha of land currently identified as Metropolitan Open Land, in Preferred Core Strategy CP 15. This is adjacent to a site currently in waste management use. The Policy notes that proposals for employment uses will be expected to contribute towards improving the strategic employment role of the area. The policy context also notes that this area of additional land could enable the development of additional waste management facilities in appropriate locations where there already is an existing concentration of such facilities, and will help achieve the Borough’s self-sufficiency target in waste management.

Community Strategies

4.59 Common themes emerging from corporate priorities and each Borough’s Community Strategy are highlighted below.

- Creating sustainable communities;
- Value for money;
- Supporting community involvement;
- Customer focus;
- A cleaner, greener borough;
- Achieving better outcomes for children and young people;
- Safer communities;
- Encouraging enterprise and employment;
- Improving housing;
- Improving health and well being;
- Inclusive communities.

4.60 All four Borough’s Community Strategies consider growth of recycling as key to achieving a greener borough. Recycling targets for each Borough are currently set out in in Community Strategies and Municipal Waste Management Strategies. Although the four South London Boroughs have yet to set targets up to 2021, Boroughs are already making significant progress.

4.61 Existing recycling targets are as follows: Merton: 33% by 2013 (under review); Croydon: 40% by 2010; Sutton: 40% by 2010; and Kingston: 47% by 2020.