Proposed Submission
Publication Stage

4 January to 15 February 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. Should submission take place, the Secretary of State will appoint an independent Planning Inspector to examine the 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 is informed by the comments of people and organisations through public consultations.

The period for making comments on this South London Waste Plan Proposed Submission document is six weeks from Tuesday 4 January 2011 to Tuesday 15 February 2011. Any comments must be received by midnight on Tuesday 15 February 2011. Please note that we are unable to extend this publication period. Please also note that any representations received will be forwarded to the Planning Inspector for consideration at the examination. Representations cannot therefore be treated as confidential.

At this stage of plan preparation, government guidance states that only matters of legal compliance and 'soundness' should be raised by respondents. At this stage the Council has limited scope to change the document prior to the Examination-In-Public and this publication is not an opportunity to revise the strategy or policies. More advice on what constitutes 'soundness' is provided with the response form.

We encourage responses to be made electronically. Representations should be made using the online standard response form found at: http://southlondonwasteplan.limehouse.co.uk. Alternatively, send an email to: 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;
- Contact respondents to tell you when and where a report on the outcome of this publication stage is available.
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: Vision, Objectives and Policies
   - Section 5: Site Descriptions
   - Schedule 1: Existing Licensed Waste Management and Waste Transfer Sites in the Plan Area
   - Schedule 2: Industrial Areas with Sites Suitable for Waste Management Facilities
   - Schedule 3: Information which may be Required for a Planning Application
   - Appendix 1: List of Evidence Base Studies
   - Appendix 2: Guidance Used in the Production of the South London Waste Plan
   - Appendix 3: Glossary

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 and areas 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 plan ensure that development does not negatively impact on communities’ quality of life.

Background

1.5 National guidance advocates, where appropriate, 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.

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 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 document within a borough’s LDF and each borough is producing its own individual Core Strategy. The Core Strategies reflect the spatial objectives of each borough’s Sustainable Community Strategy and must be in general conformity with the Mayor’s London Plan.

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2 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.

3 A Sustainable Community Strategy is produced with key local partners and sets out the strategic vision for an area.
1.9 A range of other plans sit under the boroughs’ Core Strategies. These include other Development Plan Documents (DPDs), such as site allocation documents, area action plans and development management policies documents. In addition, councils also produce Supplementary Planning Documents (SPDs) which provide guidance and advice at the local level. All documents within a borough’s LDF must be consistent with that borough’s Core Strategy and help deliver the relevant elements of the borough’s Sustainable Community Strategy.

1.10 Figure 1.2 identifies that the South London Waste Plan is being prepared to be in conformity with the emerging Core Waste Plan for Croydon, Kingston and

Figure 1.2: Relationship between Regional and Local Plans

The London Plan

Croydon Core Strategy (Adoption: 2012)

Kingston Core Strategy (Adoption: 2012)

Merton Core Strategy (Adoption: 2011)

Sutton Core Strategy (Adopted)

Borough specific planning documents (DPDs and SPDs)

Borough specific planning documents (DPDs and SPDs)

The South London Waste Plan (DPD) (Adoption: End of 2011)

Borough specific planning documents (DPDs and SPDs)

Borough specific planning documents (DPDs and SPDs)

PMC3: Map amended. See end of document
Merton and the adopted Core Strategy for Sutton. Care has therefore been taken to ensure the Waste Plan supports the Core Strategies. This has been achieved by agreeing common objectives for each borough’s 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 Sustainable Community Strategies.
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 exists to support the sustainable management of waste. Full details are provided in Appendix 2 of this plan. This section summarises key drivers for the South London Waste Plan.

National Drivers

2.2 Planning Policy Statement 10 “Planning for Sustainable Waste Management” (para 3) requires 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\(^1\) 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\(^2\) 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 community 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 the 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 are not met. Consequently, landfill is no longer a financially viable option for local authorities.

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\(^3\). 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, in 2008, 73% of London’s Municipal Waste which is landfilled goes to landfill sites in

\(^1\) PPS10 (ODPM, 2005) para 3, London Plan (GLA, 2008) Policy 4A.21

\(^2\) PPS10 (ODPM, 2005) para 3


**Figure 2.1 The Waste Hierarchy**

<table>
<thead>
<tr>
<th>Waste prevention</th>
<th>Re-use</th>
<th>Recycle/compost</th>
<th>Energy recovery</th>
<th>Disposal</th>
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<tbody>
<tr>
<td>Waste prevention / Reduce: Reducing the amount of waste produced.</td>
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<tr>
<td>Reuse: The reuse and repair of items, to prolong their life.</td>
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<tr>
<td>Recycling / composting: Recycling involves the recovery of materials for use in other products and includes composting.</td>
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<tr>
<td>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.</td>
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<tr>
<td>Residual Disposal: Disposal is generally through landfill or thermal treatment.</td>
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PMC5: Replace with “76%”

PMC4: Figure updated. See end of document
the East and South-East England regions. Of London’s commercial and industrial waste which is landfilled, approximately 60% is exported to the East and South East regions.4

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.5

2.7 Currently, London manages around 60% of its waste within its borders.6 To improve this, the Mayor’s London Plan sets targets to increase the amount of London’s waste to be managed within the capital, reaching 85% by 20207 and 100% by 20318.

2.8 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

2.9 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.

2.10 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 plan area, 640,000 tonnes of waste per year is generated by local businesses and industry9 and 416,000 tonnes is collected as municipal waste by local authorities10. In

<table>
<thead>
<tr>
<th>Table 2.1: Recycling Targets by Waste Stream</th>
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<tr>
<td><strong>Waste stream</strong></td>
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<tr>
<td>Municipal waste</td>
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<td></td>
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<tr>
<td>Commercial and Industrial waste</td>
</tr>
<tr>
<td>Construction, demolition and excavation waste</td>
</tr>
</tbody>
</table>

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5 London Plan (GLA, 2008) Policy 4A.21
6 London Plan (GLA, 2008) para 4.59
7 London Plan (GLA, 2008) Table 4A.4
8 Draft Replacement London Plan (GLA, 2009) Policy 5.16
9 State of the Environment in London (EA, Aug 2010) with estimated figure for Bromley subtracted
10 Municiple Waste Management Statistics (DEFRA, 2008/9 release)
In South London, it is recognised that the 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 plan area. This critical factor indicated a need to review the partner boroughs' existing policies related to waste development. This 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.

2.12 Taking guidance from Planning Policy Statements 10 “Planning for Sustainable Waste Management” and 12 “Local Spatial Planning” together the Government provides 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 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).


(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 a 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. Accordingly, the partner boroughs have undertaken an SA at each stage of the plan’s preparation: ‘Issues and Options’ (2008), ‘Potential Sites and Policies’ (2009), ‘Additional Sites’ (2010) and Proposed Submission (2011).

The SA Report on the Proposed Submission Version is publicised for representations alongside this document. The Council’s approach to the SA incorporates the requirements of the Strategic Environmental Assessment Directive, which requires a 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.
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 in previous consultations. It also identifies how responses have been taken into account, in this Proposed Submission version of the 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.” In developing the 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 plan must provide some flexibility to adapt to changing circumstances. The timeframe for the Waste Plan is 10 years, as set out in national guidance. However, where issues which fall beyond this time period are known, these are identified within the plan. The plan will also be monitored annually through each borough’s monitoring and reporting processes which will pick up issues.

**Preparation of the South London Waste Plan**

2.13 All boroughs have an adopted Statement of Community Involvement which form part of their LDFs 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.

2.14 Three document preparation stages have previously taken place:

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

2.15 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 2008 London Plan. During that consultation period, residents also

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15 PPS10 “Planning for Sustainable Waste Management” (ODPM, 2006 para 7.26
16 PPS10 (ODPM, 2006) para 16
suggested other sites to be considered. A ‘long list’ of around 140 sites was compiled from this information.

2.16 Following this consultation, the potential suitability of the sites on the ‘long list’ for waste management purposes was assessed by environmental consultants 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 that scored well were those which had the fewest constraints and were therefore potentially the most suitable sites for hosting waste management facilities.

2.17 Having a high score however, was acknowledged as not in itself sufficient to determine suitability or availability. In accordance with the need to provide deliverability of sites, where known or suspected, constraints on site deliverability were considered. An example of a deliverability constraint was where recent planning permission has been granted for another development which resulted 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.

2.18 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

2.19 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).

2.20 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 plan.

Stage 2a: ‘Additional Sites:’ February to March 2010

2.21 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. All eight 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 which would constrain their development for waste management purposes.

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

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

2.23 To be considered sound the Waste Plan must be “justified, effective and consistent with national policy.”

- **Justified** means the plan must be founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives

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18 PPS12 (ODPM, 2006) para 4.52
• **Effective** means that the plan must be deliverable, flexible and able to be monitored.

2.24 The anticipated further stages of the South London Waste Plan’s preparation are:

• Submission of the plan and final Sustainability Appraisal to the Secretary of State (March 2011);
• Examination by a Planning Inspector (July 2011); and,
• Adoption of the South London Waste Plan (December 2011).

2.25 The arrangements for publication of this document are in accordance with the partner boroughs’ Statements of Community Involvement.

**The Evidence Base**

2.26 A wide range of evidence base studies have been carried out to inform the plan’s development. These range from identifying potential concerns arising from traffic on the local road network to identifying the key environmental health concerns associated with waste development and their potential impacts as well as identifying 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 plan area. It also ensures the most suitable sites have been safeguarded for waste use.

2.27 The full range of reports and studies which form the South London Waste Plan’s evidence base is identified in Appendix 1.
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. The SA includes an analysis of population demographics, employment, social deprivation and the provision of transport networks. It identifies the location of the boroughs' conservation areas, nature conservation areas and protected open space as well as areas at risk of flooding. These are all important factors when considering suitable locations for waste management facilities. The 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

3.4 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.

3.5 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 2008 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) and hosts Park Royal, the 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. 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) shows the South East London region has surplus capacity 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 as a contribution to meeting the declining landfill needs of residual wastes arising exported from London.

3.6 In summary, all neighbouring London boroughs have identified or are in the process of identifying sufficient land to meet their own waste management apportionments, as set out in the 2008 London Plan. While Surrey has sufficient capacity to meet its requirements.

3.7 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.

3.8 In 2008, 90% of the plan area’s residual municipal waste, was landfilled at Beddington Farmlands. This trend continues, and since 2008, approximately 200,000 tonnes of municipal waste has annually been landfilled at Beddington.

3.9 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.

3.10 The remainder of the boroughs’ recyclable waste (i.e. the dry recyclables such as tins, plastic bottles, card and paper) is treated at 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.

1 GLA (2008) Industrial Land Capacity Supplementary Planning Guidance
3 Residual waste is that which is left over, once all the recyclables have been taken out. Waste Data Interrogator for 2008 (EA, 2010)
3.11 Finally, the partner boroughs operate seven Household Waste and Recycling Centre (HWRCs) which, since September 2008 have been managed by Environmental Waste Controls (EWC). The HWRC 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.

3.12 Recyclables collected at the HWRCs 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.

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

3.14 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, 400,000 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.

3.15 The Waste Data Interrogator for 2008 (EA, 2010) data further reveals that the landfill facility in Beddington, Sutton accommodated 553,000 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.

3.16 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, the Surrey’s Waste Plan does accommodate decreasing waste exports from London to landfill throughout the plan period.

3.17 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 South 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.

3.18 These issues are addressed within the Plan’s Vision, Objectives and Policies WP1, WP2, WP3 and WP4 (see Section 4).
Key Issue 2: How much waste must the South London Waste Plan accommodate?

3.19 The accompanying Technical Report (Evidence Base Study 4) provides a detailed analysis of how much waste is produced within the plan area. In total, in 2011, around 1.2 million tonnes of waste will be produced within the plan area:

- 649,000 tonnes is generated by local businesses and industry each year;
- Around 535,000 tonnes is collected as municipal waste by local authorities; and,
- Around 16,000 tonnes of hazardous waste is produced.
- Plus unknown quantities of Construction, Demolition and Excavation Wastes which are likely to be significant, but, as in 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.

3.20 The total amount of waste produced annually throughout the plan period is expected to rise by around 180,000 tonnes to almost 1.4 million tonnes over the Waste plan period. The Mayor of London’s apportionment in the 2008 London Plan for the plan area is slightly lower than the anticipated arisings, reaching the equivalent of 97% of waste arisings in 2020.

3.21 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.

3.22 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 (see Figure 3.3).

3.23 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.”

3.24 These are challenging waste prevention targets and the JMWMS recognises the need to build on existing work and develop co-ordinated waste awareness and education actions amongst the authorities.

3.25 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.

3.26 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 fewer 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 do not know where to begin.

3.27 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.”

3.28 The key issues for the South London Waste Plan to consider in relation to the 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.

3.29 This issue is addressed within the Plan’s Vision, Objectives and Policies WP3 and WP4 (see Section 4).

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

3.30 The locations and types of existing waste management and waste transfer facilities within the South London Waste Plan area are shown in Figure 4.1.

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

3.32 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 (which is the use of thermal treatments or composting or recycling). They simply act as depots for the storage of waste which is then sent on to be treated elsewhere.

3.33 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 1.2 million tonnes of waste each year. There is therefore already insufficient capacity to manage the equivalent tonnage that is produced within the plan area.

3.34 The difference between the plan area’s existing capacity and the waste apportionment (i.e. the minimum quantity of waste the plan must accommodate as set out in the 2008 London Plan) is:
- 0 hectares needed in total at 2011;
- 1.30 additional hectares needed in total at 2016;
- 3.08 hectares needed in total at 2021 (see Table 3.1) or;
- 4.34 hectares needed in total at 2022 to strive to manage the equivalent of 100% of waste arisings within the plan area (see Table 3.2)

3.35 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

3.36 To contribute to this land take need, it is possible to look towards the redevelopment of some suitable existing waste transfer stations. Both the 2008 London Plan and Draft Replacement London Plan encourage the redevelopment 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.

3.37 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.

3.38 Subtracting this 8 hectares from the land needed to meet the apportionment (14 hectares) leaves a requirement to identify 6 additional hectares of land to meet the London Plan’s waste apportionment or 7 hectares to meet the equivalent of 100% of waste arisings. In accordance with the Waste Plan’s vision in Table 4.1, the plan seeks to be self-sufficient and therefore its ‘need’ would be addressed by means of the provision of the aforementioned 4.34 hectare figure.

3.39 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.

3.40 There are a number of different recycling and composting facilities across the boroughs but there are currently no disposal
### Table 3.1: Calculating the Landtake Needed to Meet the 2008 London Plan Apportionment Target-Years

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2016</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Apportionments by Waste-Stream</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MSW</td>
<td>275,839</td>
<td>608,494</td>
<td>474,643</td>
</tr>
<tr>
<td>C&amp;I</td>
<td>444,653</td>
<td>444,653</td>
<td>444,653</td>
</tr>
<tr>
<td>Total Apportionment</td>
<td>884,492</td>
<td>1,148,019</td>
<td>1,322,571</td>
</tr>
<tr>
<td>Existing Management Capacity</td>
<td>439,679</td>
<td>703,366</td>
<td>877,918</td>
</tr>
<tr>
<td>Capacity Gap</td>
<td>439,679</td>
<td>703,366</td>
<td>877,918</td>
</tr>
<tr>
<td>Minimum Additional Recycling Capacity Needed</td>
<td>-18,708</td>
<td>68,063</td>
<td>148,896</td>
</tr>
<tr>
<td>Minimum Landtake Needed for Recycling/Composting at 2021</td>
<td>0</td>
<td>1.1</td>
<td>2.5</td>
</tr>
<tr>
<td>(average throughput per hectare used: 59,245)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Remaining Capacity Needed at 2021</td>
<td>458,387</td>
<td>635,303</td>
<td>729,021</td>
</tr>
<tr>
<td>(capacity gap minus minimum additional capacity needed for recycling)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Landtake Required for Remaining Capacity</td>
<td>7.4</td>
<td>10.3</td>
<td>11.8</td>
</tr>
<tr>
<td>(average throughput per hectare used: 61,951)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Landtake Required to Meet Apportionment</td>
<td>7.4</td>
<td>11.4</td>
<td>14.3</td>
</tr>
<tr>
<td>Existing Transfer Stations with Potential for Management Facilities</td>
<td>8.2</td>
<td>8.2</td>
<td>8.2</td>
</tr>
<tr>
<td>New Landtake Required (hectares)</td>
<td>-0.8</td>
<td>3.2</td>
<td>6.1</td>
</tr>
</tbody>
</table>

### Table 3.2: Calculating the Landtake Needed to Strive to Meet the Equivalent of 100% of C&I and MSW Arisings

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2016</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arisings by Waste-Stream</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MSW</td>
<td>535,000</td>
<td>649,000</td>
<td>621,000</td>
</tr>
<tr>
<td>C&amp;I</td>
<td>576,000</td>
<td>699,000</td>
<td>745,000</td>
</tr>
<tr>
<td>Total Arisings</td>
<td>1,111,000</td>
<td>1,348,000</td>
<td>1,366,000</td>
</tr>
<tr>
<td>Existing Management Capacity</td>
<td>444,653</td>
<td>444,653</td>
<td>444,653</td>
</tr>
<tr>
<td>Capacity Gap</td>
<td>739,347</td>
<td>803,347</td>
<td>921,347</td>
</tr>
<tr>
<td>Minimum Additional Recycling Capacity Needed</td>
<td>9.647</td>
<td>44.647</td>
<td>76.847</td>
</tr>
<tr>
<td>Minimum Landtake Needed for Recycling/Composting at 2021 (average throughput per hectare used: 59,245)</td>
<td>0.2</td>
<td>0.7</td>
<td>1.3</td>
</tr>
<tr>
<td>Total Remaining Capacity Needed at 2021 (capacity gap minus minimum additional capacity needed for recycling)</td>
<td>729,700</td>
<td>785,700</td>
<td>844,500</td>
</tr>
<tr>
<td>Landtake Required for Remaining Capacity (average throughput per hectare used: 61,951)</td>
<td>11.8</td>
<td>12.7</td>
<td>13.6</td>
</tr>
<tr>
<td>Total Landtake Required to Meet Total Arisings</td>
<td>12.0</td>
<td>13.4</td>
<td>14.9</td>
</tr>
<tr>
<td>Existing Transfer Stations with Potential for Management Facilities</td>
<td>8.2</td>
<td>8.2</td>
<td>8.2</td>
</tr>
<tr>
<td>New Landtake Required (hectares)</td>
<td>3.8</td>
<td>5.3</td>
<td>6.7</td>
</tr>
</tbody>
</table>

PMC48/49: Table updated. See end of the document.
Plan Area Context and Key Issues

For commercial and industrial waste, the recycling rate lags behind that achieved for municipal waste. For the South London Waste Plan area, less than 30% of commercial and industrial waste is recycled, with around 60% disposed of in landfill. 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.

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.

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 completed 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 plant 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.

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

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Table 3.3 Description of Modern Waste Management Facilities

<table>
<thead>
<tr>
<th>Summary of existing and emerging waste technologies:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Materials Recovery Facility (MRF)</strong></td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td><strong>Composting</strong></td>
</tr>
<tr>
<td>Modern composting is covered, takes place in ‘in-vessel’ composting facilities, with well-regulated airflow to reduce odours.</td>
</tr>
<tr>
<td><strong>Mechanical Biological Treatment (MBT)</strong></td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td><strong>Anaerobic Digestion (AD)</strong></td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td><strong>Modern thermal treatment including Pyrolysis and Gasification</strong></td>
</tr>
<tr>
<td>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 are made up of small units which can be added or taken away as waste streams or volumes change.</td>
</tr>
</tbody>
</table>
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.

3.45 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.

3.46 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. 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).

3.47 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.

3.48 The partner boroughs’ transfer stations have been found to be deliverable for waste treatment facilities (South London Waste Plan, 2010) and are safeguarded for waste use in Policy WP3 of this plan (see Section 4). It is therefore considered that the South London Waste Plan has accommodated the needs of the partner boroughs with regard to identifying suitable sites for their waste treatment needs.

3.49 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’ HWRCs 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 HWRC to be accommodated by intensifying provision at one of the remaining HWRCs. Alternatively, an additional site may be required to provide a new HWRC. In policy terms, the priority locations for any additional HWRC will be those sites identified in policies WP3 and WP4.

3.50 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, HWRCs and dry recyclables ends in 2022.

3.51 Although there is an option for contracts to be extended to 2027, the temporary planning permission for the landfill and associated waste management facilities at Beddington Farmlands, Sutton will expire in 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.
3.52 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 plan’s monitoring.

3.53 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.

3.54 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 in Table 3.3.

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

- To accommodate the possible need for any additional HWRCs 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

3.56 These issues are addressed within Policies WP1, WP2, WP3 and WP4 (see Section 4).

Key Issue 4: Scarcity of Available Land

3.57 In accordance with the Mayor’s 2008 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.

3.58 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 plan.

3.59 In this context, it is worth noting that for housing purposes national planning guidance describes the deliverability of sites as those which are:

- 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 during the lifetime of the plan

3.60 These criteria are considered suitable for Waste Plan purposes, national policy guidance on waste planning advises that waste planning authorities should avoid unrealistic assumptions on the prospects of the land becoming available for the development of waste management facilities having regard in particular to any ownership constraint which cannot be readily freed, other than through the use of compulsory purchase powers.

3.61 A report on the deliverability of sites has been prepared (Evidence Base Study 3: Deliverability) and identifies a scarcity of available new sites (i.e. those not already

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10 based on PPS3 (DCLG, 2010) para 54
11 PPS10 (ODPM, 2005) para 18
within waste use) within the 10 year period of this plan (2011 to 2021).

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

3.63 The boroughs’ own studies into the availability of land for businesses and industry also identify a scarcity of land 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 the majority of industrial land in order to satisfy market demand.

3.64 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.

3.65 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.

3.66 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.

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

Key Issue 5: Waste Transfer Stations

3.68 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.

3.69 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.

3.70 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.

3.71 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.

3.72 These issues are addressed within Policies WP3 and WP5 (see Section 4).
Key Issue 6: Climate Change

3.73 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).

3.74 In London, the Mayor also has ambitions to increase the proportion of energy generated from renewable sources\textsuperscript{12} 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\textsuperscript{13}.

3.75 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, the supply of heat users replaces the need for conventional power generation, thus lowering carbon impacts further.

3.76 Given the importance of minimising greenhouse 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 potentially viable 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.

3.77 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.

3.78 These issues are addressed within Policies WP6 and WP8 (see Section 4).

\textsuperscript{12} Draft Replacement London Plan (GLA, 2009) Policy 5.7
\textsuperscript{13} Draft Replacement London Plan (GLA, 2009) Table 5.1
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 and waste transfer sites for the location of sites;
- The boroughs will safeguard existing waste management and waste transfer 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 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.

Table 4.1 Vision and Objectives for the South London Waste Plan

<table>
<thead>
<tr>
<th>Vision</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Through the South London Waste Plan, the partner boroughs of Croydon, Kingston, Merton and Sutton will:</td>
</tr>
<tr>
<td>- 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.</td>
</tr>
<tr>
<td>- 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.</td>
</tr>
<tr>
<td>- 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 waste management and waste transfer sites and maximise the use of these, where appropriate.</td>
</tr>
<tr>
<td>- 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.</td>
</tr>
<tr>
<td>- Involve local communities and other stakeholders in decision making.</td>
</tr>
<tr>
<td>- Support the relevant key aims and objectives of Croydon, Kingston, Merton and Sutton’s Sustainable Community Strategies and Local Development Frameworks and the Joint Municipal Waste Management Strategy.</td>
</tr>
</tbody>
</table>
Policies Applicable in the Consideration of Proposals

4.4 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

4.5 At the second consultation stage of the Waste Plan’s production1, 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.

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

Superseded Policies

4.7 The policies anticipated to be 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.

Delivery and Monitoring of Policies

4.8 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

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1 ‘Potential Sites and Policies,’ July 2009
Table 4.3: UDP Policies Superseded by South London Waste Plan Policies

<table>
<thead>
<tr>
<th>Borough</th>
<th>Policy Reference</th>
<th>Policy Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>SPI1: Opportunities for waste management facilities</td>
<td>Strategic policy</td>
</tr>
<tr>
<td>Croydon</td>
<td>EP8: Waste and recycling</td>
<td>Strategic policy governing the location of waste management facilities</td>
</tr>
<tr>
<td>Croydon</td>
<td>EP9: Waste and recycling</td>
<td>Safeguarding against loss of existing waste management facilities</td>
</tr>
<tr>
<td>Croydon</td>
<td>UD15: Design policy</td>
<td>Provision of storage infrastructure for recyclables, to enable recycling collections</td>
</tr>
<tr>
<td>Kingston</td>
<td>MW1: Development of Waste Management Facilities</td>
<td>Strategic policy governing the location of waste management facilities</td>
</tr>
<tr>
<td>Merton</td>
<td>PE9: Waste Minimisation and Waste Disposal</td>
<td>Requires major new industrial developments to minimise waste</td>
</tr>
<tr>
<td>Merton</td>
<td>PNR1: Recycling points</td>
<td>Provision of storage infrastructure for recyclables, to enable recycling collections</td>
</tr>
<tr>
<td>Sutton</td>
<td>PNR20: Sites for waste related development</td>
<td>Policy identifying the location of waste management facilities</td>
</tr>
</tbody>
</table>

Table 4.4: Schedule of Policies

<table>
<thead>
<tr>
<th>Strategic Waste Policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>WP1: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste</td>
</tr>
<tr>
<td>WP2: Strategic Approach to Other Forms of Waste (a) Construction, Demolition and Excavation Waste (b) Hazardous Waste (c) Agricultural Waste (d) Clinical Waste (e) Radioactive Waste (f) Waste Water</td>
</tr>
<tr>
<td>Site Location Waste Policies</td>
</tr>
<tr>
<td>WP3: Existing Waste Management and Waste Transfer Sites</td>
</tr>
<tr>
<td>WP4: Industrial Areas with Sites Suitable for Waste Management Facilities</td>
</tr>
<tr>
<td>WP5: Windfall Sites for Waste Management Facility Development</td>
</tr>
<tr>
<td>Detailed Waste Policies</td>
</tr>
<tr>
<td>WP6: Sustainable Construction of Waste Management Facilities</td>
</tr>
<tr>
<td>WP7: Protecting and Enhancing Amenity</td>
</tr>
<tr>
<td>WP8: Sustainable Energy Recovery</td>
</tr>
<tr>
<td>WP9: Planning Obligations</td>
</tr>
</tbody>
</table>

**Schedules**

Schedule 1: Existing Waste Management and Waste Transfer Facilities, as Protected by the 2008 London Plan

Schedule 2: Areas with Sites Suitable for Waste Management Facilities

Schedule 3: Information Which may be Required for a Planning Application

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.

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 Kingston’s Full Council approved the document on 7 December 2010. 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.

**Strategic Planning Waste Policies**

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

**Additional Waste Capacity**

4.10 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).

4.11 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 in the 2008 London Plan, even if some waste generated within a plan area is treated outside the area.

4.12 Table 4.5 shows the apportionment for the four boroughs of the South London Waste Plan.

4.13 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 (GLA, 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.

4.14 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.

4.15 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

<table>
<thead>
<tr>
<th>Borough</th>
<th>Percentage of London total waste</th>
<th>Municipal Solid Waste (tpa) at 2020</th>
<th>Commercial &amp; Industrial (tpa) at 2020</th>
<th>Total waste to manage at 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>3.0%</td>
<td>138,000</td>
<td>285,000</td>
<td>393,000</td>
</tr>
<tr>
<td>Kingston</td>
<td>2.0%</td>
<td>90,000</td>
<td>166,000</td>
<td>256,000</td>
</tr>
<tr>
<td>Merton</td>
<td>2.9%</td>
<td>131,000</td>
<td>243,000</td>
<td>373,000</td>
</tr>
<tr>
<td>Sutton</td>
<td>2.4%</td>
<td>108,000</td>
<td>201,000</td>
<td>310,000</td>
</tr>
<tr>
<td>Waste Plan Area Total</td>
<td>10.3%</td>
<td>467,000</td>
<td>865,000</td>
<td>1,332,000*</td>
</tr>
<tr>
<td>Greater London Area</td>
<td>100%</td>
<td>4,550,000</td>
<td>8,436,000</td>
<td>12,987,000</td>
</tr>
</tbody>
</table>

* Rolling forward this figure to 2021, the end of the plan period, the total waste to manage at 2021 is 1,322,000 tpa (see Evidence Base 4: The Technical Report for further details)
Waste Plan is based upon the 2008 London Plan apportionments. It is anticipated that this aspect of the 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

4.16 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. Need is the total waste arisings.

4.17 ‘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.

4.18 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 2008 London Plan apportionment, plus an additional 1 hectare to meet the equivalent of 100% of the Waste Plan area’s waste arisings by 2021.

4.19 Given the scarcity of land available to businesses and industry, it is considered critical that the South London Waste Plan does not facilitate the overprovision of waste management facilities. Key Issue 4 (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 each borough’s monitoring and reporting processes.

4.20 Therefore, in accordance with PPS10, London Plan Policy 4A.24, the Draft Replacement London Plan and this plan’s objectives:

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 2008 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 1,148,000 tonnes of waste by 2016 to meet the 2008 London Plan apportionment and strive to provide 1,275,000 tonnes of capacity in total to meet our waste management needs by 2016.

- a minimum of 1,322,000 tonnes of waste by 2021 to meet the apportionment and strive to provide 1,366,000 tonnes of capacity in total to meet our waste management needs by 2021.

The partner boroughs of Croydon, Kingston, Merton and Sutton will deliver this by safeguarding existing capacity and encouraging intensification of sites (Policy WP3) where this meets all other policy requirements of the Waste Plan. 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 to meet the additional capacity needs will be permitted if it seeks to reduce net carbon emissions by managing waste as high up the waste hierarchy as practically possible. All development should safeguard existing communities and the environment by meeting 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 monitoring and reporting processes.

### Monitoring Framework for Policy WP1

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
</table>
| (1) 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  
Source: EA licence data and Local Authority planning consents | (1) To meet the 2008 London Plan apportionment figures or any subsequent target, for the four boroughs combined, for Municipal Solid Waste and Commercial and Industrial Waste |
| (2) Proportion of Municipal Solid Waste arisings recycled or composted  
Source: DEFRA Annual Waste Statistics | (2) To recycle/compost Municipal Solid Waste: 45% of total by 2015 (London Plan target) 50% of total by 2020 (borough target) |
| (3) Proportion of Commercial and Industrial Waste arisings recycled or composted  
Source: EA, where data is available | (3) To recycle/compost 70% of Commercial and Industrial Waste by 2020 (London Plan target) |

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

**Construction, Demolition and Excavation Waste**

4.21 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.

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

4.23 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. Existing sites within the plan area which already contribute to the management of this waste stream are safeguarded under Proposed Policy WP3.

4.24 It is therefore not anticipated that additional capacity will be needed within the plan.

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2 Survey of Arisings and Use of Alternatives to Primary Aggregates in England (DCLG, 2005)
area to treat Construction, Demolition and Excavation Waste. However, should arisings increase in the future, there is flexibility built into the plan through allowing for the provision of windfall 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**

4.25 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.

4.26 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 windfall 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.

**Clinical Waste**

4.29 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.

4.28 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 windfall 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.

**Agricultural Waste**

4.27 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 and waste transfer 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.

3 Special Waste Database (EA, 2004)
4.30 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).

4.31 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.

4.32 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

4.33 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).

4.34 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

4.35 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.
4.36 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.

4.37 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.

4.38 Therefore, in accordance with European and national legislation, London Plan Policy 4A.24 and this plan’s objectives:

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.

MONITORING FRAMEWORK FOR POLICY WP2

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

SITE LOCATION WASTE POLICIES

WP3: Existing Waste Management and Waste Transfer Sites

4.39 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 the current list of existing waste sites and allocate appropriate sites for the development of new and/or enhanced future waste management facilities.

4.40 However, national guidance also asks local planning authorities to consider whether it is necessary to allocate a site and to consider whether a site is critical to place-making. Some of the existing waste management sites with Environment Agency permits are very small concerns, such as skip hire.


5 PPS12 (CLG, 2008), para 5.1 and Planning Advisory Service guidance on allocating sites: http://www.pas.gov.uk/pas/core/page.do?pageld=469051
operators and spare car parts dealers, and it is considered to safeguard these sites for a waste management use would be unduly onerous for the current small businesses on the site. Consequently, it is considered pragmatic to safeguard only those sites with a site area of 0.2ha or larger. A site area of 0.2ha has been chosen since regional studies of waste facilities and the Technical Report of this plan suggest it is the threshold above which significant throughput amounts can be achieved.

4.41 Therefore, Schedule 1, accompanying this policy, details the existing waste management and waste transfer sites within the plan area which are to be safeguarded.

4.42 Where redevelopment or conversion from transfer to management is anticipated, Schedule 1 also identifies the sites that are likely to be developed in the period 2011 to 2016 and more details regarding these sites, such as a site plan and description, are provided in Section 5.

4.43 New waste management sites, with a site area of more than 0.2ha, will also be safeguarded. All sites on the current list of sites in Schedule 1 will be reviewed with the next revision of the Waste Plan.

4.44 London Plan Policy 4A.24 and Draft Replacement London Plan Policy 5.17 also 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.

4.45 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.

4.46 Therefore, in accordance with PPS10, London Plan Policy 4A.24, Draft Replacement London Plan Policy 5.17 and this plan’s objectives:

WP3: Existing Waste Management and Waste Transfer Sites

Existing waste management and waste transfer sites, those with a site area of 0.2ha or more, will be safeguarded for their current use or conversion to waste management. The current list (2010) is set out in Schedule 1. 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 plan’s objectives and Policy WPI, if a redevelopment results in waste being treated higher up in the waste hierarchy but leads to a reduction in overall throughput, permission may also be granted.

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6 Recycling and Recovery Facilities - A Site Investigation in London (GLA, 2005) and Rubbish In Resources Out – Design ideas for Waste Facilities in London *GLA, 2008*
### Schedule 1: Existing Licensed Waste Management and Waste Transfer Sites in the Waste Plan Area, as protected by the Mayor’s London Plan

<table>
<thead>
<tr>
<th>Site ref</th>
<th>Site name</th>
<th>Borough</th>
<th>Likely timescale for redevelopment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Metal Recycling Facilities</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>B Nebbett &amp; Son, Ellis Road, Willow Lane Industrial Estate</td>
<td>Merton</td>
<td></td>
</tr>
<tr>
<td>100</td>
<td>European Metal Recycling Ltd, Therapia Lane, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td><strong>Household Waste and Recycling Sites</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Fishers Farm HWRC, North Downs Road, New Addington</td>
<td>Croydon</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Kimpton Road HWRC, Kimpton Park Way, Sutton</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Purley Oaks HWRC, Brighton Road, West Croydon</td>
<td>Croydon</td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>Weir Road HWRC, Weir Road, Wimbledon</td>
<td>Merton</td>
<td></td>
</tr>
<tr>
<td><strong>Sites Hosting Household Waste and Recycling Sites and Borough Transfer Stations</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Factory Lane Transfer Station, Factory Lane, Croydon</td>
<td>Croydon</td>
<td>2011-2016</td>
</tr>
<tr>
<td>6</td>
<td>Villiers Road HWRC, Athelstan Road, Kingston</td>
<td>Kingston</td>
<td>2011-2016</td>
</tr>
<tr>
<td>9</td>
<td>Garth Road HWRC, Garth Road, Morden</td>
<td>Merton</td>
<td>2011-2016</td>
</tr>
<tr>
<td><strong>Physical treatment facilities</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Viridor Recycling and Composting Centre, Beddington Lane, Beddington</td>
<td>Sutton</td>
<td>2011-2016</td>
</tr>
<tr>
<td>21</td>
<td>777 Recycling Centre, Coomber Way, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>-</td>
<td>Vertal, Willow Lane, Mitcham</td>
<td>Merton</td>
<td></td>
</tr>
</tbody>
</table>

### Waste transfer sites

<table>
<thead>
<tr>
<th>Site no</th>
<th>Site name</th>
<th>Borough</th>
<th>Likely timescale for redevelopment</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Pear Tree Farm Waste Transfer Station, Featherbed Lane, Addington</td>
<td>Croydon</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Country Waste Recycling Ltd, Beddington Lane, Beddington</td>
<td>Sutton</td>
<td>2011-2016</td>
</tr>
<tr>
<td>25</td>
<td>Sloane Demolition, Amenity Way, Morden</td>
<td>Merton</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>SITA transfer station, Weir Road, Wimbledon</td>
<td>Merton</td>
<td>2011-2016</td>
</tr>
<tr>
<td>87</td>
<td>Bardon Aggregates (now trading as United Asphalt), Coomber Way, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>96</td>
<td>George Killoughery Ltd, Willow Lane, Mitcham</td>
<td>Merton</td>
<td></td>
</tr>
<tr>
<td>97</td>
<td>Severnside Waste Paper, Beddington Lane, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>98</td>
<td>Croydon Transfer Station, Endeavour Way, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>126</td>
<td>Benedict Wharf Transfer Station (also a small MRF on site), Hallowfield Way, Mitcham</td>
<td>Merton</td>
<td>2011-2016</td>
</tr>
</tbody>
</table>

### Other waste facilities

<table>
<thead>
<tr>
<th>Site no</th>
<th>Site name</th>
<th>Borough</th>
<th>Likely timescale for redevelopment</th>
</tr>
</thead>
<tbody>
<tr>
<td>87</td>
<td>87 Bardon Aggregates (now trading as United Asphalt), Coomber Way, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>96</td>
<td>George Killoughery Ltd, Willow Lane, Mitcham</td>
<td>Merton</td>
<td></td>
</tr>
<tr>
<td>97</td>
<td>Severnside Waste Paper, Beddington Lane, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>98</td>
<td>Croydon Transfer Station, Endeavour Way, Beddington</td>
<td>Sutton</td>
<td></td>
</tr>
<tr>
<td>126</td>
<td>Benedict Wharf Transfer Station (also a small MRF on site), Hallowfield Way, Mitcham</td>
<td>Merton</td>
<td>2011-2016</td>
</tr>
</tbody>
</table>

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

Sites will appear as safeguarded for waste uses on the relevant borough’s Proposals Map.

* All facilities on Beddington Farmlands have temporary permissions only. All are due to expire in 2023. After this, the land will be incorporated into the Wandle Valley Regional Park.*
Figure 4.1
Location of Existing Waste Sites as set out in Policy WP3, Schedule 1

Legend
1:90,000

Existing Waste Site
V: Vertical, Willow Lane
BF: Beddington Farmlands

Environmental Services Directorate
Guidhall 2, Kingston upon Thames, KT1 1EU

Operator: DT
Date: 16/11/10

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Monitoring Framework For Policy WP3

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) The number, site area (ha) and annual capacity (tonnes) of existing licensed waste facilities for all waste streams</td>
<td>(1) Number of existing waste management and waste transfer sites, set out in Schedule 1, not to decrease over the plan period</td>
</tr>
<tr>
<td>Source: EA licence data</td>
<td></td>
</tr>
<tr>
<td>(2) The site area of all existing waste management and waste transfer sites, set out in Schedule 1, not to decrease over the plan period</td>
<td></td>
</tr>
<tr>
<td>(3) The annual capacity of existing waste management sites, set out in Schedule 1, not to decrease over the plan period</td>
<td></td>
</tr>
</tbody>
</table>

WP4: Industrial Areas with Sites Suitable for Waste Management Facilities

4.47 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^7^.

4.48 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.

4.49 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.

4.50 The site evaluation process comprised three elements: absolute constraints (or “showstoppers”), constraints / opportunities and site assessment. The absolute constraints included: 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 and greenfield sites located within Flood Zone 3b.

4.51 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.

4.52 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.

4.53 In addition to the site evaluation, other factors were also considered such as responses to earlier consultations, further evidence gathering and the likelihood of

^7^ Para 17
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 during the lifetime of the plan

4.54 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 could be delivered from sites within broader industrial areas.

4.55 These industrial areas are locations which currently have deliverability constraints (often relating to land ownership and the constraints of land assembly) but, in the boroughs’ assessment as set out in the Deliverability Study, 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 identification of these broader industrial areas, from which seven additional hectares could be delivered, builds flexibility into the plan for the longer term.

4.56 The areas have not been identified for a particular type of waste management facility. Therefore, although the areas are shown as suitable for waste management facilities, 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.

4.57 Therefore, in accordance with PPS10, London Plan Policies 4A.23 and 4A.27, Draft Replacement London Plan Policy 5.17 and this plan’s objectives:

**WP4: Industrial Areas with Sites Suitable for Waste Management Facilities**

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.

**Schedule 2: Industrial Areas with Sites Suitable for Waste Management Facilities**

<table>
<thead>
<tr>
<th>Site ref</th>
<th>Site name</th>
<th>Borough</th>
<th>Likely timescale for redevelopment</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>Willow Lane Industrial Area</td>
<td>Merton</td>
<td>2017-2021</td>
</tr>
<tr>
<td>99</td>
<td>Croydon Purley Oaks Highway Depot</td>
<td>Croydon</td>
<td>2017-2021</td>
</tr>
</tbody>
</table>

Waste management development will be permitted on a limited amount of land, in accordance with the Waste Plan’s capacity needs identified in Policy WP1 (up to a total of seven hectares of land as calculated in 2010) on a single or multiple sites within the following industrial areas:
Areas will appear as suitable for waste management facilities on the relevant borough’s Proposals Map

## Monitoring Framework for Policy WP4

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) The number, site area (ha) and annual capacity (tonnes) of new licensed waste facilities for all waste streams over the plan period</td>
<td>(1) A limited amount of land (up to seven hectares as calculated in 2010) on a single or multiple sites within the industrial areas identified in Schedule 2 to be used for waste management uses over the plan period</td>
</tr>
</tbody>
</table>

Source: EA licence data

WP5: Windfall Sites for Waste Management Facility Development

4.58 Proposals for waste management development might come forward on sites which are not safeguarded in this plan and are not in the areas identified in Schedule 2. When this occurs, development must be related to need, as identified in Policy WP1, and must be appropriate to the site in question.

4.59 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 site evaluation for this document and also form the basis of assessing the suitability of windfall sites.

4.60 An objective site selection process was carried out to identify the areas in Schedule 2 and these areas are considered to contain sites which are the most suitable for the development of new/enhanced waste facilities. 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 and areas identified in Policies WP3 and WP4 are available and achievable before proposing windfall sites.
Figure 4.2

Title: Environmental Services Directorate
Operator: DT
Date: 16/11/10

The Location of Industrial Areas with Sites Suitable for Waste Management Facilities as set out in Policy WP4 Schedule 2

Legend

1:90,000
4.61 Therefore, in accordance with PPS10, London Plan Policies 4A.23 and 4A.27, Draft Replacement London Plan Policy 5.17 and this plan’s objectives:

**WP5: Windfall Sites for Waste Management Facility Development**

Proposals for waste facilities on windfall 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 sites safeguarded in Policy WP3 or in one of the 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.

**PMC91:** Replace with: “or”

**PMC92:** Replace with: “do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites or strategic views:”

**PMC93:** Add: "Appropriate mitigation measures will also be considered in assessing site suitability."
## Monitoring Framework for Policy WP5

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) The number, site area (ha) and annual capacity (tonnes) of new licensed waste facilities for all waste streams over the plan period</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Source: EA licence data</td>
<td></td>
</tr>
<tr>
<td>(2) 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</td>
<td></td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
</tbody>
</table>

### Detailed Waste Policies

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

4.62 “Designing Waste Facilities – A Guide to Modern Design in Waste” (DEFRA and CABE®, 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 Draft Replacement London Plan Policy 5.3 provide guidance on how to deal with the two aspects of climate change.

4.63 In terms of standards, the Building Research Establishment (BRE) has established a range of BREEAM® 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.

4.64 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. The Draft Replacement London Plan Policy 5.2 sets the following targets:

<table>
<thead>
<tr>
<th>Year</th>
<th>Improvement on 2006 Building Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010-2013</td>
<td>44 per cent</td>
</tr>
<tr>
<td>2013-2016</td>
<td>55 per cent</td>
</tr>
<tr>
<td>2016-2019</td>
<td>As per building regulations requirements</td>
</tr>
<tr>
<td>2019-2031</td>
<td>Zero Carbon</td>
</tr>
</tbody>
</table>

4.65 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

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8 Page 87
9 Building Research Establishment Environmental Assessment Method (see bream.org)
(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.


4.67 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.

4.68 Therefore in accordance with national and regional advice, Draft Replacement London Plan Policies 5.2 and 5.3 and this plan’s objectives:

**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 4.6;

(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;
(d) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;

(e) minimise waste and promote sustainable management of construction wastes on-site; and,

(f) protect, manage and enhance local habitats and biodiversity.

Monitoring Framework for Policy WP6

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) The number of permissions granted waste management facilities qualifying for the BREEAM “Excellent” standard over the plan period</td>
<td>(1) All permissions granted waste management facilities to qualify for the BREEAM “Excellent” standard</td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
</tbody>
</table>

WP7: Protecting and Enhancing Amenity

4.69 Planning Policy Statement10 “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 there 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.

4.70 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.

4.71 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.

4.72 Therefore, in accordance with PPS10 and this plan’s objectives:

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 3 will provide the basis for the assessment of the impact of a development.

PMC94: Add: “as well as ensuring regional and local nature conservation areas are not adversely affected;”

PMC95: Replace with: "affect"
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

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Number of permissions granted for waste management facilities contrary to Environment Agency advice on air quality</td>
<td>(1), (2) and (3) All new/redeveloped waste management facilities to be granted without Environment Agency objection</td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
<tr>
<td>(2) Number of permissions granted for waste management facilities contrary to Environment Agency advice on either flood risk or water quality</td>
<td></td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
<tr>
<td>(3) Number of permissions granted for waste management facilities located in either Flood Zone 2 or Flood Zone 3a</td>
<td></td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
<tr>
<td>(4) Number of permissions granted for waste management facilities incorporating SUDS or other climate change adaptation measures</td>
<td>(4) All new/redeveloped waste management facilities to incorporate SUDS</td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
<tr>
<td>(5) Number of permissions granted for waste management facilities contrary to advice from statutory consultees (e.g. Natural England, Greater London Authority)</td>
<td>(5) All new/redeveloped waste management facilities not to receive an objection from a statutory consultee</td>
</tr>
<tr>
<td>Source: Borough monitoring</td>
<td></td>
</tr>
</tbody>
</table>
WP8: Sustainable Energy Recovery

4.73 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, 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.

4.74 PPS1: “Delivering Sustainable Development” requires development to be planned to limit carbon dioxide emissions and to make good use of opportunities for the 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.

4.75 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.

4.76 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).

4.77 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.

4.78 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.

4.79 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.

PMC96: 
Add: "This contrasts with advice in Chapter 5, Paragraph 27 of the Waste Strategy for England (DEFRA, 2007), which states: "the Government does not generally think it appropriate to express a preference for one technology over another, since local circumstances differ so much."

PMC97: 
Text deleted

PMC98: 
Replace with "be re-used or recycled"
4.80 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, there is the Mayor’s requirement that waste to energy facilities should achieve a positive carbon outcome.

4.81 EU Waste Directives impose 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 groundwater.

4.82 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.

4.83 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.

4.84 Therefore, in accordance with the London Plan and this plan’s objectives:

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.

Monitoring Framework for Policy WP8

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Number of permissions granted for waste management facilities including renewable energy regeneration</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

Source: Borough monitoring

WP9: Planning Obligations

4.85 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.

4.86 In all cases, the boroughs in the plan area will try to use a planning condition to make a proposed development acceptable before

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11 The principal directive with regard to energy recovery from waste and its effect on the environment is 2000/76/EC. Other directives of note are 89/369/EEC and 89/429/EEC.
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;
- 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.

**Monitoring Framework for Policy WP9**

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dependent on individual developments</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>
Section 5: Site Descriptions

Guide to the site and area descriptions
The following pages set out details of:

• The existing waste management and waste transfer sites identified in Schedule 1. Those which are likely to be intensified or redeveloped as waste management facilities during the period 2011-2016 have site maps and descriptions, while those sites where redevelopment is unlikely have site maps only;

• The industrial areas with sites which may be suitable for additional waste management facilities, as 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.

Existing Waste Management and Waste Transfer Sites Listed in Schedule 1

<table>
<thead>
<tr>
<th>Ref No</th>
<th>Site Name</th>
<th>Borough</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Factory Lane Transfer Station, Factory Lane</td>
<td>Croydon</td>
</tr>
<tr>
<td>6</td>
<td>Villers Road HWRC, Athelstan Road</td>
<td>Sutton</td>
</tr>
<tr>
<td>9</td>
<td>Garth Road HWRC, Garth Road</td>
<td>Merton</td>
</tr>
<tr>
<td>17</td>
<td>Country Waste Recycling Ltd, Beddington Lane</td>
<td>Sutton</td>
</tr>
<tr>
<td>18</td>
<td>Viridor Recycling and Composting Centre, Beddington Lane</td>
<td>Sutton</td>
</tr>
<tr>
<td>27</td>
<td>SITA Transfer Station, Weir Road</td>
<td>Merton</td>
</tr>
<tr>
<td>126</td>
<td>Benedict Wharf Transfer Station (also a MRF on-site)</td>
<td>Merton</td>
</tr>
</tbody>
</table>

Other Safeguarded Sites in Schedule 1

<table>
<thead>
<tr>
<th>Ref No</th>
<th>Site Name</th>
<th>Borough</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Fishers Farm HWRC, North Downs Road</td>
<td>Croydon</td>
</tr>
<tr>
<td>3</td>
<td>Kimpton Road HWRC, Kimpton Park Way</td>
<td>Kimpton</td>
</tr>
<tr>
<td>4</td>
<td>Purley Oaks HWRC, Brighton Road</td>
<td>Croydon</td>
</tr>
<tr>
<td>5</td>
<td>Pear Tree Farm WTS, Featherbed Lane</td>
<td>Croydon</td>
</tr>
<tr>
<td>21</td>
<td>777 Recycling Centre, Coomber Way</td>
<td>Sutton</td>
</tr>
<tr>
<td>22</td>
<td>B Nebbett &amp; Son, Ellis Road</td>
<td>Merton</td>
</tr>
<tr>
<td>25</td>
<td>Sloane Demolition, Amenity Way</td>
<td>Merton</td>
</tr>
<tr>
<td>26</td>
<td>Weir Road HWRC, Weir Road</td>
<td>Merton</td>
</tr>
<tr>
<td>87</td>
<td>Bardon Aggregates, Coomber Way</td>
<td>Sutton</td>
</tr>
<tr>
<td>96</td>
<td>George Killoughery Ltd, Willow Lane</td>
<td>Merton</td>
</tr>
<tr>
<td>97</td>
<td>Severndide Waste Paper; Beddington Lane</td>
<td>Sutton</td>
</tr>
<tr>
<td>98</td>
<td>Croydon Transfer Station, Endeavour Way</td>
<td>Sutton</td>
</tr>
</tbody>
</table>
Site 1: Factory Lane Transfer Station, Croydon

Site Description: The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycling 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:

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution (air, water, noise)</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Nearby residential area</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Traffic</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
</tbody>
</table>

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 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.

PMC106: Add: "Evaluating and preserving any archaeological remains"
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 6: Villiers Road HWRC, 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 / Hawkes 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:

<table>
<thead>
<tr>
<th>Principal Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Traffic impact and safety concerns</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>Proximity to residents and local schools</td>
<td>Policy WP7 strengthened, see point (c) particularly</td>
</tr>
<tr>
<td>Water pollution to the Hogsmill River</td>
<td>Policy WP7 strengthened, see point (e) and (f) particularly</td>
</tr>
<tr>
<td>Loss of residential amenity</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
</tbody>
</table>
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, Daubentons 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
• The following protected habitat is located within a 500m radius: Woodland

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 9: Garth Road HWRC, 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 south-western 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:

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Nearby residential area</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Traffic</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
</tbody>
</table>

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
- The following protected habitats are located within a 500m radius: Standing Water and Lowland Meadow

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The following protected species 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 17: Country Waste Recycling Ltd, 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:**

<table>
<thead>
<tr>
<th>Principal Issues Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>The current site has a severe amenity impact</td>
<td>Policy WP7 strengthened, see paragraph 2 particularly</td>
</tr>
<tr>
<td>The traffic impact is severe</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>The site is not enclosed</td>
<td>Policy WP7 strengthened, see paragraph 2 particularly</td>
</tr>
<tr>
<td>The site is near a school</td>
<td>Policy WP7 strengthened, see point (c) particularly</td>
</tr>
</tbody>
</table>

**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 have been sited on or in the vicinity of the site: stag beetle, Eurasian Tree Sparrow, Common Starling, Common Frog, House Sparrow, Cornflower, Caraway
• The following protected habitats are located within a 500m radius: Standing Water and Woodland

**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.

**Site 18: Viridor Recycling and Composting Centre, 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:

<table>
<thead>
<tr>
<th>Principal Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning designations should be respected</td>
<td>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</td>
</tr>
<tr>
<td>Biodiversity should be protected</td>
<td>Policy WP7 strengthened, see point (b) particularly</td>
</tr>
<tr>
<td>The Sewage Treatment Works may need to expand</td>
<td>This a matter being discussed between the landowners, Thames Water Ltd, and the regulator OFWAT</td>
</tr>
</tbody>
</table>

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 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, Daubentons 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.
- The following protected habitats are located within a 500m radius: Acid Grassland, Standing Water and Woodland

Delivery: The operator has previously submitted an application on the site, which the Borough has resolved to grant.
**Site 27: SITA 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 a 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, SINC, 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 and Plough Lane Industrial Area (Sites 641, 651, 652).

**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 habitats are located within a 500m radius: Woodland and Lowland Meadow

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• The following protected species 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 126: Benedict Wharf Transfer Station (with MRF), Merton

Site Description: This existing waste site is presently occupied by a waste transfer facility, materials recycling facility and vehicle depot. The Benedict School is opposite the main access point to the north of the site and there are playing fields to the east. To the west, on the opposite side of the tramline, there is an industrial estate 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, SINC, 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:

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

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 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.

The following protected habitats are located within a 500m radius: Reedbeds, Standing Water and Woodland

**Delivery:** At the time of writing, SITA (the current occupier) has submitted a planning application to development 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.

**2: Fishers Farm HWRC, Croydon**

**3: Kimpton Road HWRC, Sutton**
Site Descriptions

4: Purley Oaks HWRC, Croydon

5: Pear Tree Farm WTS, Croydon

21: 777 Recycling Centre, Sutton

22: B Nebbett and Son, Merton

PMC120:
Map from addenda to be inserted. See end of document.
Site Descriptions

97: Severnside Waste Paper, Sutton

98: Croydon Transfer Station, Sutton

100: European Metal Recycling, Sutton

=: Vertal, Merton

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Industrial Areas With Sites Suitable For Waste Management Facilities Listed In Schedule 2:

Development of up to seven hectares within the following industrial areas will be permitted during the plan period

<table>
<thead>
<tr>
<th>Ref No</th>
<th>Industrial Area</th>
<th>Borough</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>Willow Lane Industrial Area</td>
<td>Merton</td>
</tr>
<tr>
<td>99</td>
<td>Purley Oaks Highways Depot</td>
<td>Croydon</td>
</tr>
<tr>
<td>102</td>
<td>Purley Way, Lysander Road and Imperial Way Industrial Area</td>
<td>Croydon</td>
</tr>
<tr>
<td>105</td>
<td>Factory Lane Industrial Estate</td>
<td>Croydon</td>
</tr>
<tr>
<td>125</td>
<td>Factory Lane Industrial Estate (South side)</td>
<td>Croydon</td>
</tr>
<tr>
<td>351/352/353</td>
<td>Chessington Industrial Area</td>
<td>Kingston</td>
</tr>
<tr>
<td>491</td>
<td>Kimpton Industrial Estate (Land north of Minden Road)</td>
<td>Sutton</td>
</tr>
<tr>
<td>532/533/534</td>
<td>Beddington Industrial Area (Parts of)</td>
<td>Sutton</td>
</tr>
<tr>
<td>535/539/5312</td>
<td>Beddington Industrial Area (Parts of)</td>
<td>Sutton</td>
</tr>
<tr>
<td>641/642/651</td>
<td>Durnsford Road/Plough Lane Industrial Area</td>
<td>Merton</td>
</tr>
<tr>
<td>702</td>
<td>Garth Road Industrial Area</td>
<td>Merton</td>
</tr>
<tr>
<td>1006</td>
<td>Wandle Valley Trading Estate (Part of)</td>
<td>Sutton</td>
</tr>
</tbody>
</table>

PMC124: Replace with: "641/642 Durnsford Road Industrial Estate"
Area 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 south-eastern boundary but the houses near the north-eastern boundary are separated from the site by a tramline. At the northern and southern ends of the suite 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:

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential loss of employment</td>
<td>Planning cannot control the number of jobs on any site, only the use of the site.</td>
</tr>
<tr>
<td>Located in Flood Zone</td>
<td>Policy WP7 strengthened, see point (d) particularly</td>
</tr>
</tbody>
</table>

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;
- The following protected habitats are located within a 500m radius: Acid Grassland, Reedbeds, Standing Water, Woodland and Lowland Meadow
The following protected species 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.

**Area 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 storeys. 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:

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

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;
- Remediate the site of historical contamination

- The following protected species 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
- The following protected habitats are located within a 500m radius: Calcareous Grassland and Standing Water

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.

Area 102: Purley Way, Lysander Road and Imperial Way Industrial Area, 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 cladded steel frame constructions, 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:**

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water pollution</td>
<td>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.</td>
</tr>
<tr>
<td>Air pollution</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Loss of residential amenity</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Nearby residential area</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Traffic</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
</tbody>
</table>

**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 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

- The following protected habitats are located within a 500m radius: Acid Grassland, Calcareous Grassland and Woodland

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

**Area 105: Factory Lane Industrial Estate, 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:**

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution (air, water, noise)</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Nearby residential area</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Traffic</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>Impact wildlife and people using the adjacent Wandle Park</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
</tbody>
</table>

**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 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.

**Area 125: Factory Lane Industrial Estate (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:**

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution (air, water, noise)</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Nearby residential area</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Traffic</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>Impact wildlife and people using the adjacent Wandle Valley Park</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
</tbody>
</table>

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 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.

Area 351, 352 353: Chessington Industrial Area 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 must 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

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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:**

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

**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 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
- The following protected species 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.
- The following protected habitats are located within a 500m radius: Floodplain Grazing Marsh and Lowland Meadow

**Delivery:** There are opportunities for some waste management facility development in the second half of the plan period.
Area 491: Kimpton Industrial Estate (Land North Of Minden Road), 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:

<table>
<thead>
<tr>
<th>Principal Issues Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incinerator would not be suitable</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
</tbody>
</table>

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 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.
The following protected habitats are located within a 500m radius: Calcareous Grassland, Floodplain Grazing Marsh and Lowland Meadow

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

**Area 532/533/534/535/539/5312: Beddington Industrial Area (parts of), Sutton**

**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:**

<table>
<thead>
<tr>
<th>Principal Issues Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loss on residential amenity</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>The site is near a school</td>
<td>Policy WP7 strengthened, see point (c) particularly</td>
</tr>
<tr>
<td>Effect on tram stop passengers</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Increase in traffic flow generally</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>Increase in traffic flow in Beddington Village and the Conservation Area</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>Increase in odour</td>
<td>Policy WP8 strengthened, see point (h) particularly</td>
</tr>
<tr>
<td>Impact on air quality</td>
<td>Policy WP7 strengthened, see point (e) particularly</td>
</tr>
<tr>
<td>Increase in surface water run-off</td>
<td>Policy WP7 strengthened, see point (d) particularly</td>
</tr>
<tr>
<td>Effect on retail uses within the Strategic Industrial Areas</td>
<td>Policy WP7 strengthened, see paragraph 1, particularly</td>
</tr>
<tr>
<td>Accumulation of waste facilities in the Beddington Lane area</td>
<td>Reference in Policy 3C.2 of to London Plan and Policy 6.3 of the Draft Replacement London Plan</td>
</tr>
</tbody>
</table>

**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;
• The following protected species 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
• The following protected habitats are located within a 500m radius: Acid Grassland, Standing Water and Woodland

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

Area 641/642/651: Durnsford Road/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 occupation. Buildings range in height from 8 to 20 metres. Near the boundaries of the site are the River Wandle, allotments, railway lines, residential properties. Wimbledon Stadium and other industrial properties. The site gains direct access from the A218 (Durnsford Road)."

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 SINC 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:

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential loss of employment</td>
<td>Planning cannot control the number of jobs on any site, only the use of the site.</td>
</tr>
<tr>
<td>Air Pollution (including dust)</td>
<td>Policy WP7 strengthened, see paragraph 2 and point (e) particularly. Adam E.</td>
</tr>
<tr>
<td>Odour</td>
<td>Policy WP7 strengthened, see paragraph 2 and point (h) particularly. Audrey E.</td>
</tr>
<tr>
<td>Noise</td>
<td>Policy WP7 strengthened, see paragraph 2 and point (f) particularly. Audrey M.</td>
</tr>
<tr>
<td>Litter</td>
<td>Policy WP7 strengthened, see paragraph 2 and points (h) and (i) particularly. Audrey M.</td>
</tr>
<tr>
<td>Loss of residential amenity (visual intrusion)</td>
<td>Policy WP7 strengthened, see paragraph 1 and point (i) particularly. Audrey M.</td>
</tr>
<tr>
<td>Nearby residential area, school and hospital</td>
<td>Policy WP7 strengthened, see paragraph 1 and point (c) particularly. Audrey M.</td>
</tr>
<tr>
<td>Traffic</td>
<td>Policy WP7 strengthened, see point (g) particularly. Audrey E.</td>
</tr>
<tr>
<td>Safety and amenity of local cycle routes</td>
<td>Policy WP7 strengthened, see points (a), (g) and (i) particularly. Note other cycling related LDF policies would also apply.</td>
</tr>
<tr>
<td>Threat to the neighbouring nature conservation area and contamination of the River Wandle</td>
<td>Policy WP7 strengthened, see points (a), (b) and (d) particularly and note that the site area is limited to the previously developed area</td>
</tr>
<tr>
<td>Effect on neighbouring business viability</td>
<td>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</td>
</tr>
<tr>
<td>Located in Flood Zone</td>
<td>Policy WP7 strengthened, see point (d) particularly. Audrey E.</td>
</tr>
<tr>
<td>Close to the future Wandle Valley Regional Park</td>
<td>Policy WP7 strengthened, see point (a) particularly. Audrey E.</td>
</tr>
</tbody>
</table>

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
- The following protected species 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.
- The following protected habitats are located within a 500m radius: Woodland and Lowland Meadow

PMC134: Add row: Site 651: Proximity to housing I Site 651 deleted
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.

Area 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 north-western boundary and residential properties along the north-eastern and southern boundaries. Along the western and eastern boundaries are SIvNCs and Green Corridors with trees and vegetation, which screen the site from the residential properties beyond. From the A24 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:

<table>
<thead>
<tr>
<th>Issue Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nearby residential area</td>
<td>Action WP7 strengthened, see paragraph 1 particularly</td>
</tr>
</tbody>
</table>

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
The following protected species 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, Daubentons Bat, Eurasian Badger, Lesser Noctule, Pipistrellus pipistrellus, Serotine, Soprano Pipistrelle, West European Hedgehog

The following protected habitats are located within a 500m radius: Standing Water and Lowland Meadow

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.

Area 1006: Wandle Valley Trading Estate (part of), 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:

<table>
<thead>
<tr>
<th>Principal Issues Raised</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution</td>
<td>Policy WP7 strengthened, see points (e) and (f) particularly</td>
</tr>
<tr>
<td>Greenfield Site</td>
<td>The site area is limited to the previously developed area</td>
</tr>
<tr>
<td>Inconsistent with Sutton’s plan for a sustainable Hackbridge</td>
<td>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.</td>
</tr>
<tr>
<td>Loss of residential amenity</td>
<td>Policy WP7 strengthened, see paragraph 1 particularly</td>
</tr>
<tr>
<td>Close to the Wandle Trail</td>
<td>Policy WP7 strengthened, see point (a) particularly</td>
</tr>
<tr>
<td>Increase in traffic flow</td>
<td>Policy WP7 strengthened, see point (g) particularly</td>
</tr>
<tr>
<td>Loss of Biodiversity</td>
<td>Policy WP7 strengthened and site area is limited to the previously developed area</td>
</tr>
<tr>
<td>Already suffering from existing waste facilities and landfill</td>
<td>Policy WP7 strengthened, see paragraph 2 particularly</td>
</tr>
<tr>
<td>Effect on property values</td>
<td>Policy WP7 strengthened</td>
</tr>
</tbody>
</table>
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 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
- The following protected habitats are located within a 500m radius: Acid Grassland, Reedbeds, Standing Water and Woodland

**Delivery:** The site owner has expressed an interest in developing the site.
Appendix 1: 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: Sequential Test for Flood Risk
- Evidence Base Study 2: Source Protection Zones
- Evidence Base Study 3: Deliverability Report
- Evidence Base Study 4: 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
Appendix 2: Schedule of International, National, Regional and Sub-Regional Guidance Used in the Preparation of the South London Waste Plan

International

- Directive on Hazardous Waste (91/689/EEC)
- Directive on Integrated Pollution Prevention and Control (96/61/EC)
- Directive on Ambient Air Quality and Management (1996/62/EC)
- Directive on the Assessment and Management of Environmental Noise (2002/49/EC)
- Directive on Hazardous Substances in Electrical and Electronic Equipment (2002/95/EC)
- Directive on the Promotion of the Use of Energy from Renewable Sources (2009/28/EC)

National

- Environmental Protection Act (1990)
- The Radioactive Substances Act (1993)
- The Conservation (Natural Habitat &c) Regulations (1994)
- The Environment Act (1995)
- The Environmental Protection Act (1995)
- The Disability Discrimination Act (1995)
- The Race Relations Amendment Act (2000)
- The Natural Environment and Rural Communities Act – Habitat and Species of Principal Importance in England (2006)
- The Climate Change Act (2008)
- The Energy Act (2008)
- Environmental Protection (Duty of care) Regulations (Statutory Instrument 2839/1991)
- The Landfill (England and Wales) Regulations (SI 1559/2002)
• The Waste Management (England and Wales) Regulations (SI 937/2006);
• Community Infrastructure Levy Regulations (SI948/2010)
• PPS1: Delivering Sustainable Development (2005);
• PPS: Planning and Climate Change – Supplement to PPS1 (2007);
• PPS2: Green Belts (2001);
• PPS3: Housing (2006);
• PPS4: Planning for Sustainable Economic Growth (2009);
• PPS5: Planning for the Historic Environment (2010);
• PPS9: Biodiversity and Geological Conservation (2005);
• PPS10: Planning for Sustainable Waste Management (2005);
• PPS12: Local Spatial Planning (2008);
• PPG13: Transport (2001);
• PPG14: Development on Unstable Land (1990);
• PPG16: Archaeology and Planning (1990);
• PPS22: Renewable Energy (2004);
• PPS23: Planning and Pollution Control (2004);
• PPG24: Planning and Noise (1994);
• PPS25: Development and Flood Risk (2010);
• Circular 02/99: Environmental Impact Assessment
• Circular 04/00: Planning Controls for Hazardous Substances;
• Circular 05/05: Planning Obligations;
• National Waste Strategy (Department for the Environment, Food and Rural Affairs, 2007)
• Air Quality Strategy for England: Working Together for Clean Air (DEFRA, 2007);
• Guidance for Local Authorities on Implementing the Biodiversity Duty (DEFRA, 2007);
• Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007);
• Strategy for Sustainable Construction (Department of Business, Enterprise and Regulatory Reform, 2008);
• UK Renewable Energy Strategy (Department of Energy and Climate Change, 2009);
• Health Technical Memorandum 07/01 (Department of Health, 2006)

Regional
• The London Plan (Consolidated with Alterations since 2004) (GLA, 2008);
• The Draft Replacement London Plan (GLA, 2009);
• London Plan SPG: Sustainable Design and Construction; (GLA, 2006);
• London Plan SPG: Industrial Capacity (GLA, 2008);
• South London Sub-Regional Development Framework; (GLA, 2006);
Schedule of International, National, Regional and Sub-Regional Guidance Used in the Preparation of the South London Waste Plan

- The Mayor’s Air Quality Strategy Cleaning London’s Air’ (GLA, 2002);
- The Mayor’s Municipal Waste Management Strategy: Rethinking Rubbish in London; (GLA, 2004);
- The Mayor’s Energy Strategy: Green Light to Clean Power (GLA, 2004);
- Recycling and Recovery Facilities – A Site Investigation in London (GLA, 2005)
- The Mayor’s Ambient Noise Strategy (GLA, 2007);
- The Mayor’s Climate Change Action Plan (GLA, 2007);
- The Mayor’s Draft Water Strategy (GLA, 2009);
- Powering Ahead: Delivering Low Carbon Energy for London (GLA, 2009);
- Clearing the Air: The Mayor’s Draft Air Quality Strategy (GLA, 2010);
- Draft London Climate Change Adaptation Strategy (GLA, 2010);
- Draft Municipal Waste Strategy (GLA, 2010);
- Rubbish In – Resources Out: Design Ideas for Waste Facilities in London (GLA, 2008);

Sub-Regional

- Joint Waste Statement (South London Waste Partnership, 2007);
- Outline Business Case (SLWP, 2008);
- Residual Waste Treatment Descriptive Document (SLWP, 2009);
- Draft Joint Municipal Waste Strategy (SWLP, 2010)
- Croydon’s Draft Community Strategy (London Borough of Croydon, 2010);
- Shaping Our Future 2008-2011 – Croydon’s Community Strategy (LBC, 2008);
- Croydon Unitary Development Plan (The Croydon Plan) (LBC, 2006)
- Croydon UDP Proposals Map (LBC, 2006)
- UDP Saved Policies (LBC, 2009)
- Croydon’s Core Strategy - Towards A Preferred Core Strategy (Supplement) (LBC, 2010);
- Croydon’s Core Strategy - Towards A Preferred Core Strategy (LBC, 2010);
- Towards A Preferred Core Strategy Interim SA Report (LBC, 2010);
- Croydon’s Core Strategy - Towards A Preferred Core Strategy (LBC, 2010);
- Croydon’s Core Strategy - Towards A Preferred Core Strategy (LBC, 2010);
- Core Strategy Issues and Options - Initial Report (LBC, 2009)
- Draft Infrastructure Delivery Plan (LBC, 2010)
- Strategic Flood Risk Assessment for London Borough of Wandsworth, London Borough of Merton, London Borough of Sutton, London Borough of Croydon - Level 1 Report (Scott Wilson, 2008);
- Statement of Community Involvement (LBC, 2007);
- SPD Planning Obligations (LBC, 2005);

- Kingston Plan – Kingston’s Vision for 2020 (Royal Borough of Kingston-upon-Thames, 2020);
• Kingston Core Strategy Preferred Options (RBK, 2009);
• Kingston Core Strategy Preferred Options – Consultation Report (RBK, 2009);
• Sustainability Appraisal on Kingston Core Strategy Preferred Options (RBK, 2009);
• Kingston Unitary Development Plan (RBK, 2005);
• Kingston UDP Proposals Map (RBK, 2005);
• UDP Saved/Deleted Policies Schedule (RBK, 2008);
• Statement of Community Involvement (RBK, 2009);
• Employment Land Review (RBK, 2008);
• Draft Infrastructure Plan Delivery Plan (RBK, 2009);
• SPD Planning Obligations (RBK, 2010);

• Community Plan 2009-2019 (London Borough of Merton, 2009);
• Merton Core Planning Strategy Pre-submission (LBM, 2010);
• Sustainability Appraisal on Merton Pre-submission (LBM, 2010);
• Merton Unitary Development Plan (LBM, 2003);
• Merton UDP Proposals Map (LBM, 2003);
• List of Deleted UDP Policies (LBM, 2007);
• Statement of Community Involvement (LBM, 2006);
• Employment and Economic Land Study (LBM, 2010);
• Employment Land Study – Summary (LBM, 2005);
• Infrastructure Needs Assessment (LBM, 2008);
• Strategic Flood Risk Assessment for LBM – Level 2 (Scott Wilson, 2009);
• SPD Planning Obligations (LBM, 2006);

• The Sutton Strategy (London Borough of Sutton, 2009);
• Core Planning Strategy Adopted (LBS 2009);
• Sustainability Appraisal on Sutton Core Planning Strategy Pre-Submission (LBS, 2009);
• Sutton Unitary Development Plan (LBS, 2003);
• Sutton UDP Proposals Map (LBS, 2003);
• Sutton UDP Schedule of Saved Policies (LBS, 2007);
• Sutton Employment Land and Premises Study (Atkins, 2005);
• Statement of Community Involvement (LBS, 2006);
• Infrastructure Needs Study (LBS, 2009);
• SPD Planning Obligations (LBS, 2007).
Appendix 3: Glossary

**Aerobic** In the presence of oxygen

**Agricultural Waste** Waste generated on farms or other agricultural premises such as market gardens. It consists of a diverse range of both natural (organic) and non-natural wastes including discarded pesticide containers, plastics such as silage wrap, bags and sheets, packaging waste, tyres, batteries, old machinery and oil etc.

**Anaerobic** In the absence of oxygen

**Anaerobic Digestion (AD)** A process in which biodegradable material is encouraged to break down in the absence of oxygen. Waste is broken down in an enclosed vessel under controlled conditions, resulting in the production of digestate and biogas.

**Apportionment** The amount of London’s waste a borough or group of boroughs should manage, according to the current iteration of the London Plan.

**Biodegradable** Capable of being degraded by plants and animals.

**Biodegradable Municipal Waste (BMW)** includes paper and card, food and garden waste, and a proportion of other wastes, such as textiles.

**Biogas Gas** Gas resulting from the fermentation of waste in the absence of air (methane/carbon dioxide).

**Biological Material Recovery Facility (Bio-MRF)** Bio-MRFs dry and stabilise waste before sorting out further materials for recycling, energy recovery (production of a renewable fuel) and disposal.

**Biological Treatment** A treatment technology that uses bacteria to consume organic waste.

**Capacity Gap** The deficit between the amount of waste that should be managed within a local authority’s boundaries according to an apportionment and the actual, existing waste management capacity within the boundaries.

**Commission for Architecture and the Built Environment (CABE)** Government’s advisor on architecture, urban design and public space.

**Civic Amenity Site (CAS)** See Household Waste and Recycling Centres.

**Clinical Waste** Waste arising from medical, nursing, veterinary, pharmaceutical, dental or related practices, where risk of infection may be present.

**Combined Heat and Power (CHP)/Combined Cooling, Heat and Power (CCHP)** The combined production of electricity and usable heat. Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process cooling or heating.

**Commercial and Industrial Waste (C&I)** Waste arising from business and industry. Industrial waste is waste generated by factories and industrial plants. Commercial waste is waste arising from the activities of traders, catering establishments, shops, offices and other businesses. Commercial and Industrial waste may for example include food waste, packaging and old computer equipment.

**Communities and Local Government (CLG)** Former name of the Department for Communities and Local Government.

**Composting** The biological decomposition of organic material by microorganisms under controlled, aerobic conditions.

**Construction, Demolition & Excavation Waste (C,D&E)** Waste building materials, packaging, rubble from construction and remodelling, repair and demolition operations on roads, houses, commercial buildings and other structures and excavation waste.
Core Strategy Sets out the long-term spatial vision for the local planning authority area, the spatial objectives, and outlines the strategic policies required to deliver that vision.

Department for Communities and Local Government DCLG Government department with national responsibility for planning.

Department for Environment Food and Rural Affairs DEFRA Government department with national responsibility for waste management.

Development Plan Document (DPD) Spatial planning documents within the portfolio of Local Development Documents in a Local Development Framework.

Digestate Solid and liquid product resulting from anaerobic digestion.

Disposal Final placement or destruction of toxic, radioactive or other wastes. Disposal may be accomplished through use of approved secure landfills, surface impoundments, land farming, deep-well injection, ocean dumping or incineration.

Draft Replacement London Plan This document was published by the Mayor of London in October 2009 to update the existing London Plan (see London Plan). The Draft Replacement London Plan contains new apportionments of waste as well as new waste projections for the period until 2031.

Dry Recyclables Dry recyclable household waste includes: papers (newspaper, pamphlets, envelopes, books), food tins (steel), drink cans (aluminium), milk and juice cartons and plastic bottles.

Energy from Waste (EfW) Obtaining energy from waste through a variety of processes (e.g. combustion).

Environment Agency (EA) Environmental regulatory authority formed in 1996, combining the functions of the former National Rivers Authority, Waste Regulation Authorities and Her Majesty’s Inspectorate of Pollution.

Exempt Sites Exempt from Waste Management Licensing by the Environment Agency.

Flood Zones Planning Policy Statement 25 “Development and Flood Risk” identifies a number of flood zones from Flood Zone 1 (land least at risk of flooding) to Flood Zones 3a and 3b. Flood Zone 3b is the functional floodplain and comprises land where water has to flow or be stored in times of flood.

Gasification The process whereby carbon based wastes are heated in the presence of air or steam to produce fuel-rich gases. The technology is based on the reforming process used to produce town gas from coal.

Greater London Authority GLA Regional government for London.

Green Belt A planning designation aimed at preventing urban sprawl by keeping land permanently open; the most important attributes of green belts is their openness.

Ha hectare.

Habitats Regulations Assessment Assessment of the impacts of implementing a plan or policy on an internationally important habitat such as SACs or SPAs.

Hazardous Waste Waste which, because of its characteristics, poses a present or potential hazard to human health or the environment.

Household Waste Waste from a private dwelling or residential house or other such specified premises, and includes waste taken to civic amenity site.

Household Waste and Recycling Site (HWRC) A facility provided by the Waste Disposal Authority that is available to the public to deposit waste which cannot be collected by the normal household waste collection round. Also known as Civic Amenity Sites.
Incineration The burning of waste at high temperatures in the presence of sufficient air to achieve complete combustion, either to reduce its volume (in the case of municipal solid waste) or its toxicity (such as for organic solvents). Municipal solid waste incinerators recover power and/or heat.

Inert Waste Waste that does not normally undergo any significant physical, chemical or biological change when deposited at a landfill site. It may include materials such as rock, concrete, brick, sand, soil or other material arising from construction, excavation or demolition.

In-vessel Composting (IVC) The aerobic decomposition of shredded and mixed organic waste within an enclosed container, where the control systems for material degradation are fully automated. Moisture, temperature and odour can be regulated and stable compost can be produced much more quickly than open windrow composting.

Landfill Disposal sites for non-hazardous solid wastes spread in layers, compacted to the smallest practical volume, and covered by material applied at the end of each operating day.

Landfill Allowance Trading Scheme (LATS) Process of apportionment, by a waste disposal authority, of the tonnage of biodegradable municipal waste that may be disposed of to landfill to meet EU Landfill Directive targets.

Landfill Tax A tax introduced in 1996 by HM Customs and Excise on waste deposited in licensed landfill sites, with the aim of encouraging more sustainable waste management methods and generation funds for local environmental projects. Revised in 2003.

Local Development Framework (LDF) A portfolio of Local Development Documents providing the spatial planning framework for an area.

London Plan Refers to the current iteration of the London Plan, “The London Plan (consolidated with Alterations since 2004)” which was adopted in 2008. It is the strategic spatial planning document for London.

Mechanical Biological Treatment (MBT) A generic term for mechanical sorting/separation technologies used in conjunction with biological treatment processes, such as composting.

Mechanical Heat Treatment (MHT) A process which uses a combination of heat, air and moisture to clean and sanitise mixed recyclables to produce easily segregated recyclate and a residual organic material that can be used as a solid recovered fuel in other processes. Mechanical Heat Treatment does not involve the burning of waste.

Mechanical Pre Treatment (MPT) A process that takes place prior to Mechanical Biological Treatment and involves preparing the waste for further management, such as re-use, recycling or composting. It typically involves shredding, sieving and/or magnetic separation.


Metropolitan Open Land (MOL) Undeveloped land within London’s boundary that is of strategic importance and is afforded a similar protection as Green Belt.

Mixed Waste Mixed waste can refer to any combination of waste types with different properties.

Municipal Solid Waste (MSW) Waste collected by local authorities. Mainly composed of household waste but also includes street cleaning waste, waste from reuse and recycling centres and commercial and industrial waste collected by local authority.

Office of the Deputy Prime Minister (ODPM) Former name of the Department for Communities and Local Government.

Planning & Compulsory Purchase Act 2004 Planning Act that came into force in 2004 and introduced reforms to the Town and Country Planning system.
Planning Policy Statements (PPSs)  Statements of national planning policy replacing Planning Policy Guidance notes under the Planning & Compulsory Purchase Act 2004

Pollution Prevention and Control (PPC)  Regulates certain types of business, such as those carrying out power generation, waste management activities, manufacturing and other industrial and agricultural activities. A PPC permit is required by companies carrying out activities covered under PPC. PPC is regulated by the Environment Agency or local council, depending on the activity.

Private Finance Initiative (PFI)  Partnership between public and private sectors.

Pyrolysis  During pyrolysis organic waste is heated in the absence of air to produce a mixture of gaseous and liquid fuels and a solid, inert residue (mainly carbon).

Recovery  To obtain value from waste through recycling, composting, energy recovery or other forms of material recovery, such as anaerobic digestion.

Recycling  Involves the processing of wastes, into either the same product or a different one.

Refuse Derived Fuel (RDF)  A fuel produced from combustible waste that can be stored and transported, or used directly on site to produce heat and/or power.

Reprocessing  Using materials recovered from waste to manufacture a new product.

Residual Waste  Waste left from the household sources containing materials that have not been separated out or sent for recycling.

Re-use  The re-use of materials in their original form, without any processing other than cleaning.

Self-Sufficiency  Dealing with all wastes within the administrative region (such as London) where they are produced.

Site of Special Scientific Interest (SSSI)  A national nature conservation designation.

Solid Recovered Fuel (SRF)  is a fuel produced by producing by shredding and dehydrating solid waste with a waste converter technology. SRF is a refined form of Refuse Derived Fuel (qv) which meets EU standards.

Special Area of Conservation (SAC)  Designation made under the Habitats Directive to ensure the restoration or maintenance of certain natural habitats.

Special Protection Area (SPA)  Sites classified under the European Community Directive on Wild Birds to protect internationally important bird species.

Strategic Road Network (SRN)  The network of primary roads in the boroughs.

South London Waste Partnership (SLWP)  A partnership between the four South London boroughs (Croydon, Kingston, Merton and Sutton) set up for the purposes of a joint waste procurement exercise. The SLWP will procure and run a joint contract that will cover the treatment and disposal of waste and, the management of the four boroughs’ household re-use and recycling centres and the transport of waste. The contract will only cover municipal solid waste.

Sub-Region  A division of a region – London is a region and South London is a sub-region. The South London Sub-Region consists of the boroughs of Croydon, Kingston, Lambeth, Merton, Richmond, Sutton and Wandsworth.

Sustainability Appraisal (SA)  A tool for assessing policies to ensure that they reflect sustainable development objectives, including environmental, social and economic factors. The Planning and Compulsory Purchase Act 2004 requires local planning authorities to undertake a sustainability appraisal of all local development documents.
Sustainable Community Strategy A strategy prepared by local authorities to help deliver local community aspirations under the Local Government Act 2000

Sustainable Waste Management Using material resources efficiently to cut down on the amount of waste we produce and, where waste is generated, dealing with it in a way that actively contributes to economic, social and environmental goals of sustainable development

Thermal Treatment The general term used for waste management technologies designed to generate power; and often to recover heat, through the combustion of waste

Tpa tonnes per annum

Transfer The handling and transport of waste

Transfer Station Facility where solid waste is transferred from collection vehicles to larger trucks or rail cars for longer distance transport

Transport for London (TfL) An integrated body responsible for the capital’s transport system. The primary role of TfL, which is a functional body of the Greater London Authority, is to implement the Mayor of London’s Transport Strategy and manage transport services across London

Treatment Treatment is any process that changes the physical, chemical, or biological character of a waste to make it less of an environmental threat

Unitary Development Plan (UDP) Statutory development plan prepared by Unitary Authorities. To be replaced by a Local Development Framework under the Planning & Compulsory Purchase Act 2004

Waste Arising The amount of waste generated in a given locality over a given period of time

Waste Electrical and Electronic Equipment (WEEE) Directive Aims to prevent the disposal of electrical and electronic goods and ensure greater levels of recovery and disassembly

Waste Hierarchy The waste hierarchy acts as a guide when determining the most sustainable waste management options from the ideal of prevention to disposal as the last resort

Waste Management Capacity The amounts of waste able to be managed (recycled or energy recovered) by waste management facilities within South London

Waste Management Licence (WML) The licence required by anyone who proposes to deposit, recover or dispose of controlled waste. Licences are issued and monitored by the Environment Agency

Waste Minimisation Reducing the volume of waste that is produced. This is at the top of the Waste Hierarchy

Waste Planning Authority (WPA) Local authority responsible for waste planning. In South London all four boroughs are the Waste Planning Authority for that area

Waste Return Form returned to the Environment Agency quarterly by waste management licence holders detailing the type and quantity of waste processed at each licenced site

Waste Transfer Station (WTS) A facility where waste is delivered for sorting prior to transfer to another place for recycling, treatment or disposal

Windrow Composting The aerobic decomposition of appropriate shredded biodegradable waste using long narrow piles, known as ‘windrows’. The process involves mechanical turning and remixing of the material to enable effective degradation. This results in a bulk-reduced, stabilised residue known as compost. Windrow composting can take place outdoors or within buildings and the process takes around three months
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"إذا كان من المستحيل على السُنّا أن يقرأ هذه المقطعين بسبب الإعاقة أو أي عاقبة أخرى، فعليك أن تتصل برايدرlay helpline 020 8547 5757 أو تطلب المساعدة من شخص آخر.

Director of Environment & Sustainability
Royal Borough of Kingston upon Thames
Guildhall 2
Kingston upon Thames
Surrey KT1 1EU

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Published December 2010
### Table 3.1: Calculating the Landtake Needed to Meet the 2010 Consolidated Draft Replacement London Plan Apportionment Target Years

<table>
<thead>
<tr>
<th>Year</th>
<th>MSW</th>
<th>C&amp;I</th>
<th>MSW</th>
<th>C&amp;I</th>
<th>MSW</th>
<th>C&amp;I</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2011</td>
<td>2016</td>
<td>2021</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Apportionments by waste stream</td>
<td>264,187</td>
<td>470,041</td>
<td>321,328</td>
<td>512,683</td>
<td>382,543</td>
<td>558,481</td>
</tr>
<tr>
<td>Recycling targets</td>
<td>50%</td>
<td>70%</td>
<td>50%</td>
<td>70%</td>
<td>50%</td>
<td>70%</td>
</tr>
<tr>
<td>Recycling capacity needed</td>
<td>32,093</td>
<td>470,041</td>
<td>160,664</td>
<td>358,878</td>
<td>191,271</td>
<td>390,937</td>
</tr>
<tr>
<td>Total Apportionment</td>
<td>734,228</td>
<td>834,011</td>
<td>941,024</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Recycling/composting capacity needed</td>
<td>461,122</td>
<td>329,029</td>
<td>160,664</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing management capacity</td>
<td>376,187</td>
<td>376,187</td>
<td>376,187</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed new recycling facilities on existing transfer site with good potential to be delivered within the lifetime of the Waste Plan</td>
<td>84,935</td>
<td>143,355</td>
<td>206,021</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net additional recycling capacity needed</td>
<td>4,935</td>
<td>63,355</td>
<td>126,021</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minimum land take needed for recycling/composting facilities (average throughput per hectare used: 59,245)</td>
<td>0.08</td>
<td>1.07</td>
<td>2.13</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other’ (non-recycling/composting) capacity need to manage waste</td>
<td>273,106</td>
<td>314,469</td>
<td>358,816</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed new ‘other’ treatment facilities on existing transfer site with good potential to be delivered within the lifetime of the Waste Plan</td>
<td>300,000</td>
<td>300,000</td>
<td>300,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net additional ‘other’ needed</td>
<td>-26,894</td>
<td>14,469</td>
<td>58,816</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land take required for remaining capacity (average throughput per hectare used: 61,951)</td>
<td>-0.43</td>
<td>0.23</td>
<td>0.95</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total capacity shortfall (in tonnes) to meet the apportionment</td>
<td>-21,959</td>
<td>77,824</td>
<td>184,837</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total land take (in ha) required to meet the apportionment</td>
<td>-0.35</td>
<td>1.30</td>
<td>3.08</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

### Table 3.2: Calculating the Landtake Needed to Strive to Meet the Equivalent of 100% of MSW and C&I Arisings

<table>
<thead>
<tr>
<th>Year</th>
<th>MSW</th>
<th>C&amp;I</th>
<th>MSW</th>
<th>C&amp;I</th>
<th>MSW</th>
<th>C&amp;I</th>
<th>MSW</th>
<th>C&amp;I</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2011</td>
<td>2016</td>
<td>2021</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arisings by waste stream</td>
<td>438,416</td>
<td>556,187</td>
<td>453,891</td>
<td>550,458</td>
<td>468,986</td>
<td>548,441</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recycling targets</td>
<td>50%</td>
<td>70%</td>
<td>50%</td>
<td>70%</td>
<td>50%</td>
<td>70%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recycling capacity needed</td>
<td>219,208</td>
<td>389,331</td>
<td>226,946</td>
<td>385,321</td>
<td>234,493</td>
<td>383,909</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total arisings</td>
<td>994,604</td>
<td>1,004,350</td>
<td>1,017,427</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Recycling/composting capacity needed</td>
<td>608,539</td>
<td>612,267</td>
<td>618,401</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing management capacity</td>
<td>376,187</td>
<td>376,187</td>
<td>376,187</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed new recycling facilities on existing transfer site with good potential to be delivered within the lifetime of the Waste Plan</td>
<td>232,352</td>
<td>236,080</td>
<td>242,214</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net additional recycling capacity needed</td>
<td>152,352</td>
<td>156,080</td>
<td>162,214</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minimum land take needed for recycling/composting facilities (average throughput per hectare used: 59,245)</td>
<td>2.57</td>
<td>2.63</td>
<td>2.74</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other’ (non-recycling/composting) capacity need to manage waste</td>
<td>386,064</td>
<td>392,083</td>
<td>399,025</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed new ‘other’ treatment facilities on existing transfer site with good potential to be delivered within the lifetime of the Waste Plan</td>
<td>2,57</td>
<td>2.63</td>
<td>2.74</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net additional ‘other’ needed</td>
<td>86,064</td>
<td>92,083</td>
<td>99,025</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land take required for remaining capacity (average throughput per hectare used: 61,951)</td>
<td>1.39</td>
<td>1.49</td>
<td>1.60</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total capacity shortfall (in tonnes) to meet the arisings</td>
<td>238,417</td>
<td>248,163</td>
<td>261,240</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total land take (in ha) required to meet the arisings</td>
<td>3.96</td>
<td>4.12</td>
<td>4.34</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 4.5: 2010 Consolidated Draft Replacement London Plan Apportionments

<table>
<thead>
<tr>
<th>Boroughs</th>
<th>Percentage of London total waste</th>
<th>Municipal Solid Waste (tpa) at 2021</th>
<th>Commercial &amp; Industrial (tpa) at 2021</th>
<th>Total waste to manage at 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>3.0%</td>
<td>114,707</td>
<td>167,463</td>
<td>282,258</td>
</tr>
<tr>
<td>Kingston</td>
<td>1.7%</td>
<td>66,106</td>
<td>96,510</td>
<td>162,667</td>
</tr>
<tr>
<td>Merton</td>
<td>2.9%</td>
<td>110,296</td>
<td>161,023</td>
<td>271,404</td>
</tr>
<tr>
<td>Sutton</td>
<td>2.4%</td>
<td>91,434</td>
<td>133,486</td>
<td>224,989</td>
</tr>
<tr>
<td>Waste Plan Area</td>
<td>10.0%</td>
<td>382,543</td>
<td>558,481</td>
<td>941,318</td>
</tr>
<tr>
<td>Greater London Area</td>
<td>100%</td>
<td>3,816,000</td>
<td>5,568,000</td>
<td>9,387,000</td>
</tr>
</tbody>
</table>

*Site 18: Viridor Recycling and Composting Centre, Sutton*

*Site 126: Benedict Wharf transfer Station (With MRF), Merton*

*Site 5: Pear Tree Farm WTS< Croydon*
## Appendix 4: South London Waste Plan Compliance with the EU Waste Framework Directive

### Part 1: How the South London Waste Plan is Compliant with All Articles of the EU Waste Framework Directive

<table>
<thead>
<tr>
<th>Framework Articles</th>
<th>Corresponding South London Waste Plan policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article 1: Subject, matter, scope</td>
<td>Descriptive</td>
</tr>
<tr>
<td>Article 2: Exclusions from scope</td>
<td>Descriptive</td>
</tr>
<tr>
<td>Article 3: Definitions</td>
<td>Descriptive</td>
</tr>
<tr>
<td>Article 4: Waste hierarchy shall apply along with the best overall environmental outcome. Waste policy development should be transparent. Environmental protection, sustainability, technical feasibility and economic viability, protection of resources, overall environmental, human health, economic and social impacts should be taken into account.</td>
<td>South London Waste Plan. See Policies WP1, WP6, WP7, WP8 and WP9.</td>
</tr>
<tr>
<td>Article 5: By-products may not be classified as waste</td>
<td>South London Waste Plan. See Policies WP1 and WP8</td>
</tr>
<tr>
<td>Article 6: Recycling does not constitute waste production provided there is no environmental or amenity impacts.</td>
<td>South London Waste Plan. See Policies WP1 and WP7</td>
</tr>
<tr>
<td>Article 7: List of waste</td>
<td>Environment Agency matter</td>
</tr>
<tr>
<td>Article 8: Extended producer responsibility</td>
<td>National Government matter</td>
</tr>
<tr>
<td>Article 9: Prevention of waste</td>
<td>European Union matter</td>
</tr>
<tr>
<td>Article 10: Recovery</td>
<td>South London Waste Plan. See Policies WP1 and WP7</td>
</tr>
<tr>
<td>Article 11: Re-use and recycling</td>
<td>South London Waste Plan. See monitoring of Policy WP1</td>
</tr>
<tr>
<td>Article 12: Disposal</td>
<td>South London Waste Plan. See Policy WP7</td>
</tr>
<tr>
<td>Article 14: Costs</td>
<td>National Government matter</td>
</tr>
<tr>
<td>Article 15: Responsibility for waste management</td>
<td>National Government matter</td>
</tr>
<tr>
<td>Article 17: Control of hazardous waste</td>
<td>Environment Agency matter</td>
</tr>
<tr>
<td>Article 18: Ban on the mixing of hazardous waste</td>
<td>Environment Agency matter</td>
</tr>
<tr>
<td>Article 19: Labelling of hazardous waste</td>
<td>Environment Agency matter</td>
</tr>
<tr>
<td>Article 20: Hazardous waste produced by households</td>
<td>Environment Agency matter</td>
</tr>
<tr>
<td>Article 21: Waste oils</td>
<td>Environment Agency matter</td>
</tr>
<tr>
<td>Article 22: Bio-waste</td>
<td>Municipal Waste Strategy matter</td>
</tr>
<tr>
<td>Article</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>23</td>
<td>Issue of permits</td>
</tr>
<tr>
<td>24</td>
<td>Exemptions from permit requirements</td>
</tr>
<tr>
<td>25</td>
<td>Conditions for exemptions</td>
</tr>
<tr>
<td>26</td>
<td>Registration</td>
</tr>
<tr>
<td>27</td>
<td>Minimum standards</td>
</tr>
<tr>
<td>29</td>
<td>Waste prevention strategies</td>
</tr>
<tr>
<td>30</td>
<td>Evaluation and review of plans and programmes</td>
</tr>
<tr>
<td>31</td>
<td>Public participation</td>
</tr>
<tr>
<td>32</td>
<td>Co-operation</td>
</tr>
<tr>
<td>33</td>
<td>Information to be submitted to the Commission</td>
</tr>
<tr>
<td>34</td>
<td>Inspections</td>
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<tr>
<td>35</td>
<td>Record keeping</td>
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<td>36</td>
<td>Enforcement and penalties</td>
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<td>37</td>
<td>Reporting and reviewing</td>
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<tr>
<td>38</td>
<td>Interpretation and adaptation to technical progress</td>
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<tr>
<td>39</td>
<td>Committee procedure</td>
</tr>
<tr>
<td>40</td>
<td>Transposition</td>
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<td>41</td>
<td>Repeal and transitional provisions</td>
</tr>
<tr>
<td>42</td>
<td>Entry into force</td>
</tr>
<tr>
<td>43</td>
<td>Addressees</td>
</tr>
</tbody>
</table>

**Table 2: How the South London Waste Plan is Compliant with the Clauses in Article 28 of the EU Waste Framework Directive**

<table>
<thead>
<tr>
<th>Clause</th>
<th>Requirement</th>
<th>South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>The plan shall set out&lt;br&gt;- An analysis of current waste management situation in geographical entity&lt;br&gt;- Measures to improve waste management&lt;br&gt;- Evaluation of how the plan will support the Directive</td>
<td>Yes&lt;br&gt;Yes&lt;br&gt;Yes, it is proved to insert these tables as appendices</td>
</tr>
<tr>
<td>3(a)</td>
<td>Analysis of type, quantity and source of waste generated, cross-boundary movements and evaluation of waste streams in the future</td>
<td>Yes</td>
</tr>
<tr>
<td>3(b)</td>
<td>Analysis of existing waste collection schemes, major disposal and recovery installations</td>
<td>Yes</td>
</tr>
<tr>
<td>3(c)</td>
<td>Assessment of need for new collection schemes, closure of existing waste installations and additional waste infrastructure</td>
<td>Yes</td>
</tr>
<tr>
<td>3(d)</td>
<td>Information on location criteria for site identification and the amount of new infrastructure needed</td>
<td>Yes</td>
</tr>
<tr>
<td>3(e)</td>
<td>General waste policies, including on technologies and special waste streams</td>
<td>Yes</td>
</tr>
<tr>
<td>4(a)</td>
<td>Information organisation of waste management and on the relationship between the public and private sector</td>
<td>Yes</td>
</tr>
<tr>
<td>4(b)</td>
<td>Evaluation of economic and other instruments in tackling various waste problems</td>
<td>No</td>
</tr>
<tr>
<td>4(c)</td>
<td>Information on raising public awareness on waste issues</td>
<td>Yes (through consultation stages of the South London Waste Plan)</td>
</tr>
<tr>
<td>4(d)</td>
<td>Information on contaminated waste disposal sites and their rehabilitation</td>
<td>Yes</td>
</tr>
</tbody>
</table>