STATEMENT OF COMMON GROUND 8

BETWEEN

THE BOROUGHS OF THE SOUTH LONDON WASTE PLAN

AND

SITA

Summary:

Following a meeting and further discussions between the Boroughs of the South London Waste Plan and SITA, it is proposed to amend the phrase “self-sufficiency” to “net self-sufficiency” in WP1. In addition, the same amendment will be made to other instances where the word “self-sufficiency” occurs. SITA withdraws its objections to Policy WP5 and Site 27: Weir Road Transfer Station
This Statement of Common Ground has been prepared to identify areas of agreement between SITA and the Boroughs of the South London Waste Plan on matters relating to the South London Waste Plan Proposed Submission DPD and the representations by SITA.

Background

This Statement of Common Ground relates to three representations (Nos. 113, 114 and 112) made regarding the South London Waste Plan Proposed Submission DPD.

In summary, the representor requested:

- The reference to self-sufficiency in Policy WP1 be changed to “net self-sufficiency” to reflect more accurately the cross boundary flows of waste;
- Further guidance on how to prove the deliverability of sites in Policies WP3 and WP4 in relation to Part (a) of Policy WP5;
- A map for the SITA Transfer Station (Site 27).

Matter of Agreement

Following a meeting and discussions, the boroughs of the South London Waste Plan propose to amend the wording of Policy WP1 and make other amendments where the word “self-sufficiency” occurs. SITA proposes to withdraw its representations 114 on Policy WP5 and 112 on the SITA Transfer Station (Site 27).

<table>
<thead>
<tr>
<th>Proposed Minor Change No - Suggested By</th>
<th>Policy Reference</th>
<th>Background to Change</th>
<th>Wording of Proposed Change</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITA/Partner Boroughs</td>
<td>Page 20 Paragraph 3.38</td>
<td>SITA requested that the terms “Self-sufficiency” or “Self-sufficient” should be prefixed with the word “net” in Policy WP1 to reflect more accurately the likely future situation (Representation 113). The Partner Boroughs agree with this change</td>
<td>Insert “net” as: “In accordance with the Waste Plan’s vision in Table 4.1, the plan seeks to be net self-sufficient...”</td>
<td>To reflect more accurately the likely future situation</td>
</tr>
</tbody>
</table>
| PMC 57  | SITA/Partner Boroughs | Page 27  
Paragraph 4.1  
First bullet point | SITA requested that the terms “Self-sufficiency” or “Self-sufficient” should be prefixed with the word “net” in Policy WP1 to reflect more accurately the likely future situation (Representation 113). The Partner Boroughs agree with this change and propose to amend the terms in WP1 and in other parts of the document where the terms occur. | Insert “net” as: “By working in partnership, the four boroughs will seek to maximise net self-sufficiency in managing the waste generated within the four boroughs;” | To reflect more accurately the likely future situation |
|--------|-----------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| PMC 58  | SITA/Partner Boroughs | Page 27  
Table 4.1  
Vision | SITA requested that the terms “Self-sufficiency” or “Self-sufficient” should be prefixed with the word “net” in Policy WP1 to reflect more accurately the likely future situation (Representation 113). The Partner Boroughs agree | Insert into the final sentence “net” as: “The area will be striving for net self-sufficiency in sustainable waste management.” | To reflect more accurately the likely future situation |
<table>
<thead>
<tr>
<th>PMC 72</th>
<th>SITA</th>
<th>Page 31 Policy WP1 First paragraph</th>
<th>SITA requested that the term “Self-sufficiency” should be prefixed with the word “net” in Policy WP1 to reflect more accurately the likely future situation (Representation 113). The Partner Boroughs agree with this proposed change.</th>
<th>Insert into the third sentence the word “net” as: “during the lifetime of the plan, the boroughs will seek to exceed the apportionment target and strive to attain net self-sufficiency in managing the waste generated by the four boroughs.”</th>
<th>To reflect more accurately the likely future situation</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMC 76</td>
<td>SITA/Partner Boroughs</td>
<td>Page 32 Monitoring Target (4)</td>
<td>SITA requested that the terms “Self-sufficiency” or “Self-sufficient” should be prefixed with the word “net” in Policy WP1 to reflect more accurately the likely future situation (Representation 113). The Partner Boroughs agree with this change and propose to amend the terms in WP1 and in other parts of the document where the terms occur.</td>
<td>Insert “net” as: “To achieve net self-sufficiency for the four boroughs in terms of Municipal Solid Waste and Commercial and Industrial Waste by 2020.”</td>
<td>To reflect more accurately the likely future situation</td>
</tr>
</tbody>
</table>
document where the terms occur.
14TH APRIL 2011

SITA UK response to comments from the South London Waste Plan Team - Part 1

Dear Duncan,

Thank you for your recent Email which seeks to address the concerns we raised in our representations to the Proposed Submission version of the South London Waste Plan.

I include, as Appendix A, our response to your comments relating to Policies WP1, WP5, the site map for Weir Road (site 27) and the site map for Benedict Wharf (site 126).

Please note that I’m awaiting colleagues’ feedback on the outstanding points relating to Policies WP6 and WP8 and will respond to you separately on these. Due to your pressing timescales, I thought it might be helpful to send on as much information as I currently have and I’ll endeavour to respond to the remaining issues tomorrow.

Yours sincerely,

Emma Smyth

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Appendix A

Policy WP1 (Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste) states that the Plan strives to meet self-sufficiency in waste management. However, it is considered that the phrase should be 'net self-sufficiency'. The notion of self-sufficiency implies a geographic restriction on the movement of waste which is contrary to the concept of resource management and could restrict the ability for waste to be managed further up the waste hierarchy. The London Plan considers net self-sufficiency for London (See Tables 4A.4 and 4A.5 of the Adopted London Plan and Part F of Policy 5.16 of the Draft Replacement London Plan).

Proposed changes
To conform with the London Plan and support the movement of waste up the hierarchy, it is considered that the phrase 'self-sufficiency' within this policy should be amended to read, 'net self-sufficiency.'

South London response: I would like to thank you for drawing my attention to this discrepancy and can inform you that officers intend to incorporate your proposed change to the policy wording and to other references of self-sufficiency in the document.

SITA UK response: Thanks and noted. We welcome you making this change.

Policy WP5: Windfall Sites for Waste Management Facility Development) states that proposals for waste facilities on windfall sites will be considered and planning permission granted, provided the proposed development meets a number of criteria including that it is demonstrated that the proposed facility is not deliverable on one of the safeguarded sites identified in policies WP3 and WP4. Further guidance on the circumstances which the local planning authority would consider could satisfy this criteria would be welcomed.

Proposed changes
Further guidance on the circumstances which the local planning authority consider would satisfy the criteria around proposing waste facilities on new sites (i.e. those not identified in policies WP3 or WP4) is welcomed.

South London response: It is clearly stated in the final sentence of paragraph 4.60 on page 41 of the Proposed Submission document that developers of windfall sites would have to demonstrate that the sites and areas identified in policies WP3 and WP4 are not “available and achievable”. Availability and Achievability are defined in paragraph 4.53 on page 40 of the Proposed Submission document. Officers are therefore of the opinion that no further guidance would be necessary.

SITA UK response: Thanks and noted. We welcome this clarification and have no further comment.
Site Map for Weir Road Transfer Station (Site 27)

Please note also there is currently no site map identified within Section 5 of the Waste Plan for our Weir Road Transfer Station facility (site 27). I enclose a site map which was submitted as part of our application to Merton Council for a MRF onsite. We would welcome the inclusion of a site map within the Submitted version of the South London Waste Plan.

South London response: The site map for ‘Site 27: SITA Transfer Station, Merton’ is on page 61 of the published Proposed Submission version of the South London Waste Plan. I have re-checked the boundary and it is the same as the map that you have submitted. I also took the opportunity to re-check the boundary of the other saved SITA site, Site 126: Benedict Wharf Transfer Station (with MRF), Merton’, on page 62. I have noticed a minor error along the southwestern boundary insofar as the site boundary includes a strip of land that is designated as Green Corridor on Merton’s Proposal Map. Attached is a map with the southwestern boundary amended accordingly. You will note that the amended southwestern boundary is aligned with the existing site boundary and similar to that on the Site Plan submitted with your current planning application (LB Merton Ref. No.08/P2724).

SITA UK response: Thank you for your confirmation that the site map for Site 27: SITA Transfer Station, Merton is already included within the Section 5.

Regarding Site 126: Benedict Wharf, we note from the UDP Proposals Map that the area of land you are suggesting is withdrawn from the Waste Plan is designated Green Corridor policy land and Merton UDP Policy EN8 applies which seeks to prevent development which would impair the integrity of the green corridor. We further note that the amended site boundary is in line with our submitted planning application. We therefore support this amendment.

End.