Information Included by Respondents in Support of their Application

Part 4

Relating to Sterecycle & Cappagh/Roger Miles Planning Ltd Representations PSPS142-146
Stereecycle Limited and Cappagh

Representations in respect of the
South London Waste Plan
Proposed Submission Draft

Appendix Volume
Contents

1. Detailed process description
2. Design statement and illustrative design material (Plans and visualisations supplied separately)
3. Former unitary development plan policies governing the location of waste management uses
4. Sustainability appraisal
5. Extracts from London Borough of Sutton Core strategy: submission draft
6. Landscape and visual impact assessment (Supplied separately)
7. Transport assessment (Supplied separately)
8. Ecology assessment (Supplied separately)
9. Correspondence from Thames Water
The Sterecycle Operations

The development on the 2.4ha site, will comprise a single building housing five main processes. These can be summarised as:

▫ Waste reception and loading;
▫ Autoclave operation;
▫ Recyclate processing and operation;
▫ Dry Anaerobic Digestion; and
▫ Combined heat and power generation.

The scale and nature of these processes is described further below.

Waste inputs will comprise up to 240,000 tonnes per annum (tpa) of MSW and C/I waste. The relative proportions will depend ultimately on contract availability, however should the SLWP have successfully procured a long-term contract for the treatment of MSW, then the proposed facility at Beddington will rely on locally arising C/I waste.

An approximate mass balance showing the relative proportions of material through the treatment process is set out below.

**Autoclave Pre-treatment**

Pre-treatment of residual MSW is carried out through Sterecycle’s autoclave process with subsequent material separation. The typical configuration involves the installation of three autoclave vessels, each with a combined capacity of 80,000tpa, providing a total facility capacity of 240,000tpa.

The Sterecycle process produces two primary products from municipal and commercial wastes:

▫ A biomass product, Sterefibre, which, because of the non-intrusive nature of the treatment process, is a high quality, biomass rich material that can be used as a carbon-neutral, low-contaminant fuel; a feedstock for anaerobic digestion; or as a high quality soil conditioner. Between 55% and 65% of the input waste recovered as Sterefibre, depending on the input waste composition.
▫ Clean, sterile recyclates in the form of glass, plastics, ferrous and non ferrous metals and inert materials (for processing through existing, established markets). Approximately 15% of the input waste is recovered as recyclable material depending on the input composition.

This is achieved through the use of steam treatment in pressurised autoclaving vessels. A brief overview of the autoclave process is as follows:

Waste treatment through Sterecycle’s autoclave stage is the core element of the Sterecycle process. Through a series of conveyors, residual waste is loaded into each autoclave vessel, with the vessel inclined at approximately 30°.

Once the autoclave vessel is fully loaded with waste the door is closed. The fully loaded vessel is lowered down to a horizontal position for processing. The autoclave vessel is rotated at all times during processing which together with the internal design, helps to both agitate and prevent agglomeration of the waste.
Typically the Sterecycle process is conducted at 130 to 140°C which requires a relatively low pressure of 2-3 bar within the autoclave. The waste will remain in the vessel for approximately 1.5 hours. The internal steam atmosphere changes the heterogeneous nature of the waste materials, sterilises them and converts the bio-degradable waste (e.g. food, paper, card and other cellulose material), into a homogeneous biomass fibre. This fibre is hereafter referred to as Sterefibre.

As well as producing Sterefibre, the autoclave process acts as a ‘steam-sterilisation’ process, where the materials subjected to increased temperature and pressure, are clean and sterile so that the varying elements can be readily separated through a series of mechanical processing operations into recyclable fractions. Through the autoclave cycle, high density plastics are softened, plastic bottles, cans and other metal objects are steam-cleaned and labels removed. The volume of the waste is reduced by approximately 60% during the process. The Sterecycle process uses a number of patented design concepts that result in significant energy and water efficiency whilst providing a fibre product of high biomass content of a consistent particle/fibre size.

Once unloaded from the autoclaves, the processed materials move into a discharge conveyor ready to be moved into the bunker storage area within the waste separation hall. The post-autoclave waste materials are first passed through a 300mm trommel to remove large textiles that will inhibit efficient materials separation, <300mm items are discharged into the storage bunker for onward despatch to landfill.

Once waste is loaded in the feed hopper, it is conveyed into the MRF area where the waste will be separated into fibre, clean autoclave treated products (recyclables) and residual materials.

The autoclave outputs are firstly passed through a 50mm trommel to remove large items (>50mm) for recycling and present a primarily fibre stream (<50mm) to the fibre refinement and screening part of the MRF.

**Materials <50mm**

Material that passes through the rotary trommel screen consists mainly of the biomass fibre rich fraction. This material falls through the screen and is collected by a conveyor and is passed under an overband magnet to remove ferrous metals for recycling. The remaining biomass fibre is then passed through a double deck screen. This machine has two screens with apertures set at 12mm (top deck) and 4mm (lower deck).

The screens separate the fibre stream into two fractions of material:

1. A medium size fraction of up to <12mm with minimal grits and inert material that is suitable for processing by the Anaerobic Digestion process, and;

2. A coarse fraction of >12mm to <50mm of higher calorific content that is suitable for use as a fuel in the thermal treatment process.

**Materials >50mm**

Oversized materials from the rotary trommel screen greater than 50mm in size are firstly passed through an air knife to remove heat resistant plastic film. This plastic film, predominantly polypropylene, is passed into a storage bunker ready for exporting to the Plastics Fuel Plant via conveyor. The rest of the material is then discharged onto a conveyor which passes through a picking cabin when textiles, wood, hardcore and identifiable hazardous waste/WEEE are manually removed for further recycling or disposal. The recovered material is removed by hand and dropped into containers situated under the picking cabin via chutes from the picking stations.
The remaining material upon leaving the picking cabin then passes under an overband magnet to remove ferrous metals which once removed, are transferred to a temporary storage bunker prior to removal from the site for recycling. An Eddy Current Separator is then used to remove non-ferrous metals which are also temporarily stored in a bunker below.

The material is then conveyed through two Near Infra-red (NIR) Sorters, which through targeted controlled compressed air impulses, can selectively remove the desired objects from the material flow. The first NIR will be programmed to remove dense Polypropylene (PP) plastics, while the second will be remove dense Polyethylene Terephthalate (PET) plastics. These plastics are then transferred to the plastic reprocessing section, where they are shredded and passed through a 10mm trommel screen to remove any residual fibre contamination. The shredded plastics is then transferred to the Plastics Fuel Preparation Plant via conveyor linking the two operations for further processing.

Once all metals and plastics have been removed, the remaining residue, which consists of non-recyclable material, is conveyed to a storage bunker for disposal.

**Combined Heat and Power Facility**

An integrated Combined Heat and Power (CHP) scheme, utilising Anaerobic Digestion (AD) and thermal treatment technology will process the medium and coarse grade fibre and suitable fuel outputs from the MRF.

The fibre (to <12mm) and coarse grade fibre (>12 to 50mm) streams will be directed on dedicated conveyors to storage facilities located in the CHP plant area. A proportion of the fine grade fibre (approx 52%) will be fed directly to the AD feed storage bunkers. The remaining fibre (approx 48%) will be conveyed to the thermal treatment plant feed storage for blending with the digested fibre and coarse fibre prior to combustion.

**AD Plant**

The AD plant feed storage bunker provides buffering capacity. A buffer-unit is provided to enable the supply of a continuous feed to the digesters. The capacity of the intermediate storage provides approximately 3 days worth of feed materials. The use of this intermediate step guarantees that digester will be burdened uniformly and consequently that there will also be very regular production of gas.

Process water from the dewatering of the digestate and condensate from the autoclave process is incorporated with input materials and a proportion of finished digestate is taken from the digester output and re-circulated into the fresh material. This ensures a rapid increase in biological activity and digestion of the fresh input material. In order to avoid sudden loads to the biological process, the charging of the daily input is spread evenly over 24 hours per day and 7 days per week.

**Digestion**

The core digestion facility is designed as an array of nine Kompogas dry AD fermenters consisting of three triple modules; each Kompogas unit is itself completely stand alone operational. This offers the advantage of a very dependable plant with a very uniform production of gas and inbuilt contingency in the event of unavailability in any one fermenter.

The biological process in the digester is based on anaerobic thermophilic ‘dry’ digestion at a temperature of approx. 55°C and an average substrate moisture content of approx. 70%. The digestion reactors are fully sealed to achieve anaerobic conditions and therefore free of odour. The continually-fed horizontal plugflow reactor gives a high gas yield and is particularly reliable due to its
simple controllability. A slowly rotating longitudinal paddle-shaft assists in breaking up the digested material to release the gas produced by microbes under anaerobic conditions.

Various factors such as the temperature in the digester, section levels and the amount of gas produced are constantly monitored and controlled. The digester is equipped with a number of multi-layer safety features such as flares, pressure release valves, overfill protection and a bursting disc, etc.

**Product discharge / centrifuge dewatering process**

The anaerobic digestion of the fibre results in a waste product (digestate). The digestate material will be removed from the digesters by a reciprocating pump (one discharge pump (solids handling pump) per digester) and fed to the centrifuge dewatering and system that reduces the moisture content of the digestate prior to it being fed into the thermal treatment plant.

**Biogas Utilisation**

The biogas generated in the digesters is supplied directly to gas engines. Because the digester is horizontal and filled with material to approx. 2/3 of the available volume, the upper area of the digester serves as a gas accumulator. As a result the supply to the gas engines is kept steady without the need for external pressurised gas storage. Electrical and thermal energy is generated by the gas engines.

The electricity generated by the gas engines is fed into the public grid. The thermal energy from the hot water circuit is used for the digester heating system.

**Thermal Treatment**

An integrated thermal treatment plant will process the coarse grade fibre, digestate and residuals arising from the AD process. The main function of the thermal treatment section of the CHP plant is to process the biomass-rich fibre and digestate product streams to produce steam and power. A proportion of the steam will be fed to the autoclave plant to provide the heat necessary for the treatment of the MSW. The remaining steam will pass through a steam turbine-generator to produce electricity or be fed to the proposed adjacent Plastics to Fuel Plant. Some of the electricity will be used on-site for the autoclave, MRF and CHP plant. The balance will be exported to the local electricity distribution network and CHP networks.

The principal elements of the thermal treatment plant are:

- Fuel Reception & Feed
- Combustion
- Heat Recovery
- Power Generation
- Flue Gas Treatment
- Control System

These are each described in the following sections.

**Fuel Reception and Feed**

The dewatered digestate, remaining undigested medium grade fibre and the coarse fibre streams will be received in a bunker adjacent to the thermal treatment plant. The various materials will be blended
using a computer-controlled overhead grab crane programmed to lift and re-distribute the materials in
the bunker to ensure effective mixing. The mixed fuel will be conveyed from the storage bay to the
main combustor feed hoppers from where it will then be continuously fed by screw conveyors/rotary
valves into the combustion chambers.

**Thermal Treatment Process**

The combustor comprises a fuel feed system, ash removal system, combustion air feed equipment
and hot flue gas exhaust system.

**Combustion Chamber**

The fuel will be progressively fed into a fluidised bed comprising sand and ash. The fluidised bed is
maintained in suspension by primary combustion air blown into the base of the bed. The bed is
maintained at a high temperature by the combustion of the fuels. The fluidised bed ensures that the
fuel is retained at a high temperature for sufficient time to ensure the complete combustion of the
calorific material.

Inert incombustible material (ash) remaining after combustion will be continuously removed from the
fluidised bed through a trough equipped with a water cooled screw conveyor.

The combustion chambers will be designed and operated in order to satisfy the WID requirements of a
minimum temperature of 850°C for a period of more than two seconds to ensure full burn-out of the
volatile material.

**Ash Removal and Storage**

The water-cooled ash conveyor will cool the ash, remove it from the combustion chamber and
discharge it into an ash hopper. From here, the cooled ash will be conveyed using a bucket elevator
to the ash storage silos. These will be elevated allowing them to discharge by gravity into collection
vehicles positioned underneath the silos.

**Heat Recovery**

The hot exhaust gases from the combustor will be conveyed into a steam boiler in order to cool the
exhaust gases, transferring their energy to the water and steam circuits within the boiler system.

**Steam Turbine**

The superheated steam from the boiler will be piped into a high efficiency multi-stage condensing
steam turbine. The electricity generated by the operation of the steam turbine will be at an appropriate
voltage and frequency, and prepared for connection into the site grid supply point.

A proportion of the steam supplied to the turbine will be extracted as required for use in the autoclaves
for processing the MSW. The remaining steam from the turbine outlet will be piped to the air-cooled
condenser where the steam will be condensed and returned for re-use as boiler feed water.

**Flue Gas Treatment**

The cooled exhaust gases leaving the steam boiler will then pass into the flue gas treatment system
where contaminants within the gas stream will be captured and removed prior to exhaust of cleaned
gas to the atmosphere.
The flue gas treatment plant will be designed to meet all the WID emission requirements and to meet current legislative requirements and industry best practice. The plant will consist of:

- Flue gas conditioning equipment to inject reagents that will capture, convert and aid recovery of acidic components such as sulphur dioxide and hydrogen chloride;
- Fabric filters to remove solid dust residues and converted contaminants; and
- Selective Non-Catalytic Reduction for removal of oxides of nitrogen.

An alkaline reagent such as sodium bicarbonate will be injected into the flue gas stream to capture and convert acidic gases such as sulphur dioxide and hydrogen chloride into recoverable salts.

The cleaned gas will be discharged to the stack via an induced draft fan that ensures a correct negative pressure is maintained throughout the boiler and flue gas treatment system. A continuous emission monitoring and sampling system will be installed within the stack both to allow recording of emissions in order to demonstrate compliance to the Environment Agency and to enable operating parameters to be varied to minimise emissions levels.

**Bottom Ash and APC Residue**

Bottom Ash and APC residues from the combustion process will be managed by Sterecycle. Bottom ash will be for recycling to construction products. APC residues, due to their hazardous nature will be sent to hazardous landfill for disposal.

**Summary**

The process flow is illustrated on the Flow Diagram overleaf, with approximate tonnages relating to each stage.
Plastics Depolymerisation Plant (PDU)

Purpose of Process

The aim of this plastic depolymerisation process is the production of liquid fuel from mixed recycled plastics. By-products are a hydro-carbon-rich heating gas and a carbon-enriched slag.

The economics of the plastics depolymerisation plant relies upon generating the maximum yield of the liquid fuel (known as central distillate [CD]) and the minimisation of residual substances. The central distillate that is produced is comparable to diesel or automotive fuel.

The gas that is generated through the process used internally for the production of process heat. In order to meet the total requirement for process heat, a small fraction of the middle distillate is also used to generate heat.

In comparison to other existing processes, the PDU process provides a continuous reaction, a simple and efficient self-cleaning of the heating surfaces and low reaction temperatures without catalysts. This results in lower energy consumption, no additional catalyst costs and lower maintenance costs.

Fig 1: Principle flowchart of the PDU-process

A flowchart and description of the process for a 30,000 tpa plant is provided below. The capacity of the facility proposed for the Sterecycle/Cappagh site by comparison is 25,000 tpa.
The plant comprises the following process units:

1. **Acceptance unit**
   Used plastics are delivered to the acceptance unit. After reception control the plastic is loaded into bunkers to create a more homogenous mass flow into the plant.

2. **Dosing unit**
   The plastics are fed via spirals and compressing screws into the dosing unit where they are metered and compacted.

3. **Melting unit**
   The plastics are then fed into the melting unit where they are heated using indirect heating in the to a temperature of 200 - 280°C. The product from this process is know as the Melt. Once produced, this is transferred to the cracking unit.

4. **Cracking unit**
   The cracking unit is operated at 360 - 450°C. The reactor consists of several parallel spirals and screws, which are driven individually and provide high turbulence and intensive mixing. This provides a rapid rise in temperature of the Melt up to 450°C.

5. **Separation unit**
   The gas and steam that are created in the cracking unit are then fed into the separation unit for splitting. The separation unit consists of a packed column designed to separate the product into various fractions, a partial condenser for adjustment of the product quality, a quench absorber for management of the condensation and a cooler for adjusting the temperature of the distillate.
6. **Storage Unit**
The steam and distillate are then fed into the storage unit where they are buffered in process tanks. The system operates using two tanks with a capacity of at least one days output that are used alternately. This enables the quality control of the distillate to take place in one tank whilst the second tank is filled.

7. **Filling Unit**
From the storage unit the liquid product is transferred into various containers within the filling unit for export from the site. These containers comprise either fuel truck and trailer rigs or liquitainers with 20 m³ content.

8. **Solids Outlet Unit**
The hot slag residue, which was discharged from the crack reactor, is converted into a transportable and cold solid in the solids outlet unit.

9. **Heating Unit I**
The necessary energy for the treatment of the plastics in the melting unit is produced within heating unit I. Part of the liquid distillate is used as a fuel in this process.

10. **Heating Unit II**
The necessary energy for the conversion of the Used Plastics (UP) in the cracking unit is produced in heating unit II. Gas from the gasholder and liquid distillate are burned to provide the energy in this process.
APPENDIX 2

DESIGN STATEMENT
and
ILLUSTRATIVE DESIGN MATERIAL
Development of an integrated Waste Management Facility and Energy Centre for Beddington

30/01/2011.

The proposal seeks to provide an architectural solution for a large scale industrial building within an environmentally and visually sensitive location adjacent to the proposed Wandle Valley Country Park to the east of the site. The proposed site sits directly adjacent to Beddington Industrial Area and forms a gateway building to the existing Beddington farmlands and the aforementioned future country park and is divided into 2 parts separated by a new access road. The larger site to the north will house the new integrated waste facility and associated service yard, car parking and ancillary buildings whilst to the smaller site to the south will house a new plastics to fuel plant physically linked to the waste facility by means of an underground conveyor belt, with hard standing for vehicle turning and car parking. A green strip is retained to the south and west with a substantial tree belt to connect to the landscape strip running to the south and minimise impact with the future park.

The proposal seeks to minimise the impact of building through manipulation and enhancement of the landscaped setting. The overall site is lowered by approximately 2 metres, the displaced earth is then banked around the perimeter to form a protective bund creating a visual barrier to the main road, entrance road and future park. This will lower the overall height of the main facility, hide the loading bay, vehicle parking and reduce associated traffic noise. In addition the sloped grass banking links to the new curved grass roofs which link the west to the east via a series of undulating plains which create a new landscape setting and a physical bridge to the park, whilst offering unparalleled views to the north, east and south. The green bridge terminates the adjacent industrial development and creates a gateway building to the landscaped wedge. The varying heights of the curved roof forms house the technical equipment within including the turbine hall and autoclaves, the apex of the curves also disguise the chimneys from the south. The building is primarily clad in concrete panels with a wall of timber cladding which softens the building’s appearance and sets up a datum aligning with the eaves height of the adjacent fuel plant. Above this datum the proposal offers a mix of materials- pre cast concrete, Reglit glass strips and polycarbonate curtain walling. These cathedral like windows offer views from the outside into the plant whilst providing natural daylight. At night the large overhanging roof frames these light boxes, emphasising the undulating curves whilst minimizing light pollution.

The site to the south adjoins the protected green strip and forms a structured edge to the left of the primary entrance. The proposal suggests a new plastics to fuel plant which sits directly adjacent to the existing shed on Beddington Lane matching this in height and mass. The building and surrounding hard standing and storage sit directly on the perimeter of the site and are both unified and hidden by an 8 metre high green wall which forms a frontage to Beddington Lane, an edge to the new access road and a counter point to the green bridge of the new waste facility. The fuel plant reflects both the neighbouring sheds in mass and scale but directly mirrors the curved roofs of the waste facility in form, the roof springs vertically and curves to form a slow arc which is then covered in a similar meadow grass to the gentle slope. This grass roof is visible from behind the green wall, blending together to form a green edge to the site thereby reducing the building’s impact to the street and park.

In addition to the perimeter banking the proposal retains existing trees to Beddington Lane and introduces a further layer of semi mature trees to each edge to further reduce the buildings’ visual impact.

Russell Baxter for ARCHIAL
APPENDIX 3

FORMER UNITARY DEVELOPMENT PLAN POLICIES
GOVERNING THE LOCATION OF WASTE MANAGEMENT USES
**Sutton UDP 2003**

**Policy PNR20 - Sites for Waste-Related Development**

The council will favourably consider waste-related development on sites within industrial areas or within extensive areas of despoiled, contaminated, previously developed or derelict land or a history of a waste-related use other than restored landfill sites. The council will adopt a preference for sites which will have good access to the strategic rail network and offer the opportunity to be rail-connected. Such sites should also have good access to the strategic road network.

**Merton UDP 2003**

**Policy PE.10: Waste Facilities**

Applications for waste management facilities, such as facilities for the storage of waste or refuse, waste treatment and reprocessing plants including concrete crushers, incineration plants and waste transfer/bulk reducing stations, will not be permitted outside the designated industrial areas. Within these areas, the council will assess applications for waste management facilities against the following criteria:

(i) compliance with the best practicable environmental option (BPEO);
(ii) compliance with the waste hierarchy set out in the government's waste strategy 2000 for England and Wales;
(iii) incorporation of waste recycling, or waste-energy measures;
(iv) proximity to the waste and refuse used;
(v) means of disposal of any residues arising;
(vi) location and use of the site in terms of its relationship to the rail and strategic road networks;
(vii) potential traffic generation in terms of the number and form of trips;
(viii) environmental impact of traffic trips in terms of noise and air pollution;
(ix) environmental effects on the surrounding area from the operation of the facility;
(x) visual impact of the facility;
(xi) contribution to employment and regeneration of the locality;
(xii) compliance with strategic planning guidance regional strategies, regional self-sufficiency and waste disposal plan for the area.

**Croydon UDP 2006**

**Policies EP8 and EP9**

EP8 Development of waste management facilities will be permitted in the following locations:
i) Purley Way North and South and Marlpit Lane Strategic Employment Locations;  

ii) The other Employment Areas;  

iii) Existing industrial and warehousing sites elsewhere in the Borough, and;  

iv) Existing waste management facilities.  

Provided:  

i) The location of the facility is appropriate for the scale of the proposal;  

ii) The proposal represents the best practicable environmental option for that waste;  

iii) The proposal adheres to the proximity and regional self-sufficiency principle;  

iv) The effect of the development on noise, odour, air pollution and visual amenity is minimised;  

v) The effect of motor traffic generation and whether the site has a short, safe and direct link onto the London Distributor Road Network and is within close proximity to the Strategic Road Network; and  

vi) The site is or is capable of being linked to the national rail network.  

The Council will use conditions and where appropriate, will seek planning obligations to achieve these aims.  

EP9 Development will not be permitted which would lead to the loss of existing waste management facilities unless:  

a. It is established that alternative facilities are to be provided; or  

b. There is no longer a need for these facilities; or  

c. The impact of the use of the existing facilities on neighbouring development is so severe that the relocation of facilities elsewhere is justified.  

Kingston UDP 2005  

Policy MW1 Development of Waste Management Facilities  

The Council encourages the appropriate development of recycling and composting facilities and may use the community benefit policy to secure further facilities. Proposals for other waste management facilities should not restrict waste minimisation, recycling or composting initiatives. Apart from composting facilities, new waste management facilities will not be permitted in Green Belt, Metropolitan Open Land and areas of local open space. All new waste management facilities should be sited where: i) adverse impact on residential amenity is minimal; ii) sufficient access and servicing arrangements are available; iii) harm to historic character, such as conservation areas and listed buildings, can be avoided.
London Plan 2008 – Incorporating Alterations Since 2004

Policy 4A.22 Spatial policies for waste management

In support of the Mayor’s Municipal Waste Management Strategy, the aim of driving waste management up the waste hierarchy, the objectives of communities taking more responsibility for their own waste and disposing of waste in one of the nearest appropriate installations and the need to plan for all waste streams, the Mayor will, where appropriate, and DPD policies should:

- safeguard all existing waste management sites (unless appropriate compensatory provision is made)
- require, wherever feasible, the re-use of surplus waste transfer sites for other waste uses
- identify new sites in suitable locations for new recycling and waste treatment facilities, such as MRFs, waste reuse and recycling centres (Civic Amenity sites), construction and demolition waste recycling plants and closed vessel composting
- require the provision of suitable waste and recycling storage facilities in all new developments
- support appropriate developments for manufacturing related to recycled waste
- support treatment facilities to recover value from residual waste
- where waste cannot be dealt with locally, promote waste facilities that have good access to rail transport or the Blue Ribbon Network in accordance with Policy 4C.8
- safeguard waste sites, including wharves (in accordance with Policy 4C.9), with an existing or future potential for waste management and ensure that adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance.

The Mayor will promote the co-ordination of the boroughs’ waste policies and will work with boroughs to identify strategically important sites for waste management and treatment and will expect boroughs to apply the provisions set out in this Policy and Policies 4A.23, 4A.25 and 4A.27 in bringing forward development plans and in considering development proposals.

The Mayor will work with the LDA, the boroughs and business to identify opportunities for introducing new waste reprocessing capacity in London. Boroughs in their DPDs must identify suitable sites where materials reprocessing facilities can be located. The Mayor will encourage the development of resource recovery parks/consolidation centres, where manufacturing industries and recycling and recovery industries can co-locate.

He will also work with the South East and East of England regional authorities to co-ordinate strategic waste management across the three regions. He supports the establishment of an inter-regional body to co-ordinate technical issues across the three regions.

Policy 4A.23 Criteria for the selection of sites for waste management and disposal

London boroughs should in their development plan documents identify sites and allocate sufficient land for waste management and disposal, employing the following criteria:
- proximity to source of waste
- the nature of activity proposed and its scale
- the environmental impact on surrounding areas, particularly noise emissions, odour and visual impact and impact on water resources
- the full transport impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport
- primarily using sites that are located on Preferred Industrial Locations or existing waste management locations. Wherever possible, opportunities should be taken to include provision for Combined Heat and Power and Combined Cooling Heat and Power and to accommodate various related facilities on a single site (resource recovery parks / consolidation centres).

The Mayor will keep these criteria under review, and SRIFs should reflect the need for any sub-regional interpretation. In recognition that there will inevitably be some movement of waste across the regional boundaries, the Mayor will work with the South East and East of England regional authorities to co-ordinate strategic waste across the three regions.
APPENDIX 4

SUSTAINABILITY APPRAISAL
## Preliminary Sustainability Appraisal of Site 57 – Land West of Beddington Lane

<table>
<thead>
<tr>
<th>Objective</th>
<th>Sustainability Principle</th>
<th>Effect</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managing resources</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Biodiversity</td>
<td>To conserve and enhance natural habitats and wildlife, and to bring nature closer to people.</td>
<td>-</td>
<td>The proposal will result in the loss of habitat within an Site of Importance for Nature Conservation. The site is in most outside the area of the Wandle Valley Regional Park and lies totally outside the area of the Beddington Farmlands conservation management plan that is propsed for enhanced ecological managment. The incorporation of visitor and education facilities does, however, offer the prospects of enhanced links with the farmlands site as does the provision of green roofs on the buidligns (see illustrative design)</td>
</tr>
<tr>
<td>Water Quality and Resources</td>
<td>To improve the quality of surface waters and groundwater, and to achieve the wise management and sustainable use of water resources.</td>
<td>+</td>
<td>The development will incorporate rainwater harvesting. In addition, surplus process waters will be re-circulated, thereby reducing the requirement for the use of clean, potable water. The housing of the process two bespoke building also maximises the potential for appropriate controls over discharge of water and surface run off.</td>
</tr>
<tr>
<td>Natural Resources</td>
<td>To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured local products</td>
<td>+</td>
<td>The site will be used for the recycling and recovery of MSW and commercial and industrial waste and will thereby maximise the recovery of value from the waste stream as well as generating renewable energy and creating the potential for the using energy locally.</td>
</tr>
<tr>
<td>Climate Change</td>
<td>To address the causes of climate change through minimising the emissions of greenhouse gases and ensuring that London is prepared for its impacts.</td>
<td>++</td>
<td>The development as a whole is carbon negative and thereby makes a significant contribution towards the appropriate management of waste in a highly sustainable manner.</td>
</tr>
</tbody>
</table>

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1. To the extent that the appraisal requires information on the design and operation of a facility, it is based upon the descriptions of the potential uses set out at Section 2 and Appendix 1 and the illustrative material presented in Appendix 2. This is designed to reflect the operational interests of Sterecycle / Cappagh and demonstrate the manner in which the site could be developed to accommodate those processes.
## Preliminary Sustainability Appraisal of Site 57 – Land West of Beddington Lane

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<th>Effect</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>To improve air quality.</td>
<td>O</td>
<td>The housing of the processes within bespoke buildings and the adoption of a high standard of environmental controls will ensure that emissions to air are minimised and do not give rise to a deterioration in air quality. Being a local treatment facility, the development will not increase the number of lorry miles travelled. Furthermore, it will result in a significant diversion of waste from landfill, thereby reducing methane generation associated with the management of the waste. The concentration of waste activity within the Beddington area may, however, result in a slight localised worsening of air quality. On balance it is considered that the impact on air quality will be neutral.</td>
</tr>
<tr>
<td>Energy</td>
<td>To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</td>
<td>++</td>
<td>The development provides the majority of its own heat and power needs and through the use of the product in AD and for biomass energy generation will result in a significant contribution being made to the provision of renewable energy. This will contribute towards both security of energy supplies and diversification of energy generation technology in accordance with Government policy.</td>
</tr>
<tr>
<td>Waste</td>
<td>To minimise the production of waste across all sectors and to increase re-use, recycling, remanufacturing and recovery rates.</td>
<td>++</td>
<td>The development makes a significant contribution towards maximising the potential for recycling and recovery within London generally and within south London in particular.</td>
</tr>
<tr>
<td>Getting results</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Built and Historic Environment</td>
<td>To enhance and protect the existing built environment (including architectural distinctiveness, townscape/landscape and archaeological heritage), and to ensure new buildings are appropriately designed and constructed in a sustainable way.</td>
<td>O</td>
<td>The development has been designed having regard to its location adjacent to the Wandle Valley Regional Park. Based upon the illustrative material presented, it will make a significant contribution towards improving the local townscape and landscape. It has also been designed as an exemplar of sustainability encompassing, inter alia, green roofs and rainwater harvesting</td>
</tr>
</tbody>
</table>
### Preliminary Sustainability Appraisal of Site 57 – Land West of Beddington Lane

<table>
<thead>
<tr>
<th>Objective</th>
<th>Sustainability Principle</th>
<th>Effect</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing.</td>
<td>To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.</td>
<td>O</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Accessibility / Availability (Transport)</td>
<td>To maximise accessibility to key services and amenities and to increase the proportion of journeys made by public transport, by bicycle and on foot (relative to those taken by car).</td>
<td>O/+</td>
<td>A green travel plan will be prepared and agreed to promote journeys to work other than by car. The location of the facility relative to the source of the waste and the potential for co-location of waste management uses within a single recovery park will also serve to reduce lorry miles travelled.</td>
</tr>
<tr>
<td>Regeneration &amp; Land-Use.</td>
<td>To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the sustainable re-use of previously developed land and existing buildings.</td>
<td>O</td>
<td>The sited comprises despoiled and contaminated site within a generally less attractive area of South London. The quality of the development has the potential to effect a significant improvement in the immediate locality. The potential benefits are offset, however, by the loss of Metropolitan Open Land. In addition, the development has the potential to provide CHP and hence contribute towards the supply of energy locally without recourse to the national grid.</td>
</tr>
<tr>
<td>Employment.</td>
<td>To offer everyone the opportunity for rewarding, well-located and satisfying employment.</td>
<td>+</td>
<td>The development will create up to 100 local jobs. The jobs will be a mix of types and skill levels ranging from unskilled labour, characteristic of the waste management industry, through to managerial and office staff.</td>
</tr>
<tr>
<td>Stable Economy.</td>
<td>To encourage a strong, diverse and stable economy, and to improve the resilience of businesses and their environmental, social and economic performance.</td>
<td>+</td>
<td>The proposal affords the opportunity to develop a high quality and sustainable waste management service within South London at an affordable price. The facility will also be of a high quality and will represent a significant capital investment in the Beddington area.</td>
</tr>
<tr>
<td>Creativity and Innovation.</td>
<td>To promote creativity and innovation in the environmental and social economy (including new clean technologies, renewable energy, pollution control and the skills sector).</td>
<td>++</td>
<td>The proposed processes represent a major step change in the sustainable management of waste. The processes are both innovative and creative and have major benefits for renewable energy generation and pollution control.</td>
</tr>
</tbody>
</table>
## Preliminary Sustainability Appraisal of Site 57 – Land West of Beddington Lane

<table>
<thead>
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</thead>
<tbody>
<tr>
<td><strong>Taking responsibility</strong></td>
<td></td>
<td></td>
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<tr>
<td>Liveability and Place.</td>
<td>To create and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</td>
<td>0</td>
<td>The development will be located within a predominantly industrial area and will have no significant impact either on the balance of uses or on the fabric or constitution of the area. Local liaison groups are proposed, together with community consultation to ensure that the limited number of local residents who do live in proximity to the site are kept fully informed.</td>
</tr>
<tr>
<td>Education and Skills.</td>
<td>To maximise the education and skills levels of the population.</td>
<td>+</td>
<td>Sterecycle/Cappagh would propose to implement a local employment and training scheme thereby resulting in an overall improvement in local skill levels.</td>
</tr>
<tr>
<td>Ownership and Participation.</td>
<td>To promote civic participation, ownership and responsibility, and to enable individuals, groups and communities to contribute to decision-making at neighbourhood, borough and regional levels in London.</td>
<td>+</td>
<td>The provision of local waste treatment facilities helps promote local responsibility for the reuse, recycling and recovery of materials. The development will incorporate also a visitors centre and education facility designed specifically to promote waste awareness.</td>
</tr>
<tr>
<td><strong>Developing respect</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Health and Well-being.</td>
<td>To maximise the health and well-being of the population and to reduce inequalities in health.</td>
<td>0</td>
<td>The facility will be fully health and safety compliant and will be designed to the highest emission standards thereby ensuring that there is no adverse impact on the health of the local population.</td>
</tr>
<tr>
<td>Safety and Security.</td>
<td>To enhance community safety by reducing crime, antisocial behaviour and the fear of crime.</td>
<td>0/+</td>
<td>The provision of local waste facilities that are properly secured and operated will assist in reducing the potential for fly-tipping.</td>
</tr>
<tr>
<td>Equality and Diversity.</td>
<td>To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</td>
<td>0/+</td>
<td>Sterecycle/Cappagh are equal opportunities employer.</td>
</tr>
</tbody>
</table>
APPENDIX 5

EXTRACTS FROM LONDON BOROUGH OF SUTTON
CORE STRATEGY: SUBMISSION DRAFT
EXTRACTS FROM LONDON BOROUGH OF SUTTON CORE STRATEGY:

SUBMISSION DRAFT

2.10 The Beddington SIL, which is the largest of the Borough’s industrial areas, currently suffer from a poor quality environment, notably in that part alongside Beddington Lane. There are opportunities to use market demand to upgrade and improve this area.

4.18 Fundamental to delivering economic success is the need to ensure an appropriate range and mix of high quality employment sites.

4.19 There will be additions to the amount of employment land in the Borough achieved by releasing 7.3ha of land currently identified as Metropolitan Open Land to the west of Beddington Lane adjoining the Beddington SIL and 1ha to the north of the Kimpton SIL. There will also be significant enhancements to the environment and transport infrastructure within the Beddington Strategic Industrial Location.

5.47 Demand for industrial land stems partly from the waste management industry. London Plan Policy 3B.4 emphasises the need to make provision for waste management on industrial sites. Together with neighbouring South London boroughs, the Council is seeking locations for local waste management facilities, to ensure that as much value from waste is recovered as possible and to encourage the development of a ‘green economy’ to reprocess this.

5.48 A number of options were considered for meeting the identified industrial land shortfall. With the exception of Felnex and the Wandle Trading Estate, all the Borough’s existing industrial areas are well used and there is relatively limited scope for their intensification through redevelopment of underutilised sites. There is no scope for additional industrial development on other previously developed sites other than the disused gas holder site (0.41ha) on Wrythe Lane which is proposed as an extension to the Plump ton Way Industrial Estate.

5.49 Most of the undeveloped land in the Borough is protected from development by Green Belt and Metropolitan Open Land (MOL) designations, or is used as open space to serve the local population. An assessment of the options has suggested that the limited extension of two existing SILs onto adjoining MOL provides the best solution to meeting the industrial land shortfall.

5.50 In accordance with the Spatial Strategy, and in order to meet the Vision and Strategic Objectives SO10 and SO11:

Core Policy PMP4 – Main Locations for Industry

The Council will maintain an adequate supply of industrial land and provide employment opportunities in the Borough over the period of the Core Planning Strategy. Accordingly, the Council will:

- Encourage the development of Beddington, Kimpton and Imperial Way as Strategic Industrial Locations;
Promote the extension of employment land at the Beddington Strategic Industrial Location on 7.3ha of land west of Beddington Lane, currently identified as Metropolitan Open Land (MOL);

Promote the extension of employment land at the Kimpton Strategic Industrial Location on 1ha of land to the north of the Kimpton Estate on land currently identified as MOL;

Retain and promote the intensification of employment uses on the following established Industrial locations: Restmor Way; Gander Green Lane and Abbots Road; St Andrews Road/Plumpton Way; Oldfields Road Trading Estate; and the former Paynes Chocolate Works;

Retain and promote the intensification of employment uses as part of proposals for mixed use development on the following Established Industrial Locations: Wandle Valley Trading Estate (40%); Hackbridge Station (30%); and Felnex Trading Estate (25%); and

Support proposals for new development, which improves opportunities for small and medium enterprises in all economic sectors.

The detailed boundaries of the two expansion areas are identified on the Proposals Map and the Site Development Policies DPD, will contain proposals for their development. In particular, such proposals will set out requirements for environmental and infrastructure improvements. At Beddington, this will include necessary highway improvements to Beddington Lane (see Appendix 4 for details).

Land at Beddington Farmlands provides an important part of the proposed Wandle Valley Regional Park, and the Council will seek to ensure the speedy completion of existing and any future mineral extraction and landfill tipping operations, consistent with Core Policy PMP4, and the final restoration of land, enabling full public access within the boundaries of the Regional Park at the earliest opportunity.

Boundary amendments are proposed at four MOL sites: land North of Kimpton SIA (1ha); two parcels of land to the west of Beddington Lane contiguous with Beddington SIA (7.3ha in total); and land North of BedZED (7ha). The justification for the loss of MOL is set out in detail in the Report of Studies (2008) and is summarised below.

The very special circumstances for the de-designation of land at the Beddington and Kimpton sites include the need to meet identified shortfall for industrial land; the lack of alternative sites to increase industrial capacity elsewhere in the urban area of the Borough; recognition that the provision of additional employment land would consolidate investment in the Borough’s SILs; and, in the case of the land west of Beddington Lane there are no other sites suitable and readily available within the Borough for strategic waste facilities.

All the areas of MOL to be de-designated re part of much larger swathes of MOL and the evidence base demonstrates that the remaining areas of designated MOL would continue to
be of strategic significance and continue to perform at least one of the three functions identified in the London Plan required to justify continued designation.

5.138 Three of the parcels of MOL are part of the larger Beddington Site of Importance for Nature Conservation (SINC) and ecological evidence15 has identified that the development of the areas will affect the integrity of the SINC to varying degrees. Having taken this evidence into account the Council is proposing to de-designate a smaller area of MOL adjacent to Beddington Lane (reduced from 11ha in the Preferred Options document to just over 7ha). This will ensure protection of the most valuable areas of land and facilitate appropriate mitigation. The Ecological Appraisal recommends that more detailed surveying will be required for land north of BedZED during the appropriate seasons in 2009 to fully establish existing habitats and preferred measures for enhancement. The changes to SINC boundaries at these locations will be progressed through the Site Development 15 ‘Ecological Appraisal of Areas B3, A22 and A24’ - MKA Ecology Ltd (2008) Policies DPD.

5.139 Development on each of the four areas will be required to facilitate a range of significant enhancements to the remaining MOL and the wider area.

Core Policy PMP9 – The Open Spaces Network

The Council will seek to safeguard and enhance the Borough’s open space network, including: land within the Metropolitan Green Belt; Metropolitan Open Land; parks and other open spaces comprising the Wandle Valley Regional Park; and local open space (as shown on the Proposals Map).

The Council will ensure that the overall Borough-wide target of public open space with unrestricted access of 2.88ha per 1,000 population is maintained.

The Council will designate the former Orchard Hill Hospital and BIBRA sites as ‘major developed sites’ (as shown on the Proposals Map).

The Council will work with its partners and adjoining authorities to support the enhancement and management of the urban fringe through ‘Green Arc’ initiatives.

The Council will de-designate 7.3ha of MOL at Beddington Strategic Industrial Location. Development proposals for employment uses within this additional area will be expected to contribute towards: improving the strategic employment role of the area; the improvement of Beddington Lane; the creation of the Wandle Valley Regional Park; enhancing the nature conservation value of Beddington Farmlands; and providing significant environmental improvements.

The Council will de-designate 7ha of MOL north of BedZED. Proposals for development will be expected to contribute to the objectives of the sustainable Hackbridge neighbourhood.

The Council will de-designate 1ha of MOL north of the Kimpton Strategic Industrial Location. Proposals for employment uses within this additional area will be expected to contribute towards improving the strategic employment role of the area and providing significant environmental improvements.
The Council will seek to safeguard and enhance the Metropolitan Green Chains within the Borough (as shown on the Proposals Map) and will improve public access to and through them. The Council will ensure that proposals for new housing development make provision for children's' play and informal recreation.

The Council will protect and seek to enhance the Borough’s biodiversity through supporting measures, which meet the objectives of the London and Local Biodiversity Action Plans.

6.139 To the west of Beddington Lane, an area totalling about 7ha could provide for future needs, including for waste management and recycling industries. Core Policy PMP4 highlights that its development could help fund environmental enhancements (including to the Wandle Valley Regional Park) and improvements to Beddington Lane and the amplification to Policy PMP9 sets out the justification for its de-designation as MOL.

6.140 The provision of new waste management facilities will have a key role in the growth of the ‘green’ economy within South London, promoting manufacturing and energy from waste and reducing London’s contribution to climate change.

6.141 When considering planning applications for new waste management facilities the Council will have regard to the site selection criteria to be set out in the Site Development Policies DPD and the additional locational criteria set out in PPS10 and its Companion Guide.
APPENDIX 6

LANDSCAPE AND VISUAL IMPACT ASSESSMENT
APPENDIX 7

TRANSPORT ASSESSMENT
APPENDIX 8

ECOLOGY ASSESSMENT
29th May 2009

L.B. Sutton Core Strategy – Land West of Beddington Lane

Dear Mr Shotliff,

Thames Water Utilities Limited fully supports the use of the proposed Beddington site for waste treatment. We confirm that the site is no longer required for operational purposes. There are many advantages to be gained from the development of a CHP plant at the site primarily on the significant reduction on reliance of fossil fuels at the existing waste water treatment plant together with an enhanced ability to generate and use renewable energy at the treatment plant.

We confirm that the site known as Pongo Park will also become surplus to operational requirements in the near future and support its proposed use for habitat replacement.

Yours sincerely

Chris Colloff
Planner
Thames Water Property Services.
From: Richard.Hill@thameswater.co.uk [mailto:Richard.Hill@thameswater.co.uk]
Sent: 11 February 2011 11:00
To: Alistair Shotliff
Subject: Beddington Lane

Thank you for your email dated 11 February 2011.

I can confirm on behalf of Thames Water Utilities Ltd (TWUL) that sludge lagoon 5 and the eastern half of lagoon 6 are outside of the area leased to Viridor and that TWUL has no intention of releasing this area from operational use for the foreseeable future. To this end it is not our intention to complete the s.106 agreement associated with planning application D2005/54794.

I trust that this answers your point.

Kind regards

Richard

From: "Alistair Shotliff" [ashotliff@sterecycle.com]
Sent: 02/11/2011 10:54 AM GMT
To: Richard Hill
Subject: Beddington Lane

Richard

Sterecycle is preparing its case to support the development of its Beddington Lane Site as a waste management facility by objecting to the Submission version of the South London Waste Plan Development Plan Document which was published on Tuesday, 4 January 2011. The deadline for representations on the Plan is midnight on Tuesday, 15 February 2011. Key to the planner’s position is their belief that the Beddington Landfill will be extended in line with Viridor’s planning application reference D2005/54794 submitted in September 2005 which LB Sutton resolved to grant in October 2008 subject to a s.106 agreement. I understand that this planning permission has still not been granted as the s.106 agreement has not been completed.

It would be helpful for the Inspector to be clear on this point in his consideration of the Plan and whether Thames Water plans to release the remaining areas of sludge lagoons 4 5 and 6 for development as an extension to the landfill.

Would it be possible for you to set out Thames Water’s intentions in this regard?

Please call if you require any clarification.

Regards

Alistair

Alistair Shotliff
Development Director
Sterecycle
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F: +44 (0)207 361 1839
www.sterecycle.com

The contents of this email are confidential. If you are not the person to whom this e-mail is addressed, please notify us and delete this e-mail and the attachments immediately, without forwarding or copying it to anyone.

Stereicycle Limited and Cappagh

Representations in respect of the

South London Waste Plan

Proposed Submission Draft
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<td>Alterations to Metropolitan Open Land (MOL) boundary and Allocation of Site 57 for Waste Management Purposes</td>
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1 Introduction

1.1 The following representations are submitted on behalf of Sterecycle Limited and Cappagh in respect of Site 57, Land West of Beddington Lane (Site 57). The representations have been prepared jointly by Sterecycle and Cappagh and on their behalf by Roger Miles Planning Limited and LRS Consultancy.

1.2 The submission comprises the following;

a. A comprehensive report detailing objections to the plan and the case in favour of the release of Site 57 - Land West of Beddington and its allocation for waste management use;

b. Appendices to the comprehensive report comprising a detailed process description, layouts and designs for the development designed to illustrate the manner in which development would be accommodated on Site 57 and separate technical reports supporting the suitability of Site 57 for release from MOL and allocation for waste management purposes.

c. A separate form completed for each objection and detailing the specific changes sought.

1.3 Whilst the Plan is not specific about the types of waste management activity that are required to deliver the strategy, it is pertinent to examine the type of facilities proposed for location at Site 57 given the promotion of the site by specific waste management interests. This will serve to demonstrate the benefits that can accrue from co-location manner, the requirement for and benefits of making strategic land releases and the manner in which the proposed development can be accommodated on the site without giving rise to significant or unacceptable impacts on the local environment or local communities.

Sterecycle Limited

1.4 Sterecycle Limited is a provider of clean recycling technology for Municipal Solid Waste (MSW), and similar non-hazardous commercial and industrial waste types, based on an innovative steam conditioning process. This technology provides a unique solution to the treatment of MSW by allowing the diversion from landfill of up to 80% of the treated waste via recycling and reuse of clean and safe products.

1.5 Sterecycle has developed its first plant, and indeed the first such plant in the world, in Rotherham. This facility was commissioned and became operational during 2008 and is now operating for the reception of MSW from the Barnsley, Rotherham and Doncaster area, together with locally generated commercial and industrial waste. The Sterecycle system is cleaner, and more efficient than other residual waste treatment technologies such as standard mechanical sorting, in-vessel composting, Mechanical Bio-Treatment, advanced thermal treatment and incineration. Indeed, Sterecycle can be integrated with existing systems to pre-recover recyclables and dramatically improve system performance.

Cappagh

1.6 Cappagh is a family owned South-West London based contracting company that has been committed to serving the construction industry for almost 40 years, initially focussing on local civil engineering contracts, providing expertise for public utilities such as gas, water, sewers, highways drainage and ducting for the electric and telecommunications industry. Through forward thinking, innovation and continued investment, the company has grown significantly, enhancing both its diversity of operations and portfolio of clients and now enjoys a wider market share across the South-East.
1.7 The firm currently employs over 300 staff working out of 11 sites with its Head Office in Wimbledon and operational/recycling centres across southern London.

1.8 More recent developments have included significant investment in the set up of the company's own Aggregate Recycling Centres. These are strategically sited to service the growing sphere of operations, designed to recycle construction waste and maximise the production of recycled aggregates for re-use within the company's own construction projects, thus providing an environmentally friendly, cost-effective and uniquely integrated service.

1.9 As part of the desire to diversify its operations and with the move into recycled products, the Company is now seeking to establish alternative recovery operations. The Company has been approached by Nextek to develop a plastics to fuel plant. Cappagh has also been in discussions for some time with Sterecycle with a view to maximising the potential of each site at Beddington. There are good environmental and economic benefits for both Cappagh and Sterecycle to co-locate their respective developments at Beddington.

**The Intended Processes**

1.10 Sterecycle and Cappagh are seeking to develop an integrated Resource Recovery and Energy Park (the Park) at Site 57 for the management of both commercial and industrial waste and municipal solid waste. The Park will incorporate a number of different processes housed within two main process buildings. The processes will include autoclave technology, anaerobic digestion, combined heat and power and the conversion of plastics to fuel.

1.11 The processing and recovery operations will utilise the Sterecycle autoclave technology to pre-treat waste imported into the site. The processed sterilised waste stream will then be separated into various material fractions, i.e. metals, plastics, wood etc and Sterefibre.

1.12 The Sterefibre will be used as a fuel within an Anaerobic Digestion (AD) process, where there will be gas generated which will be either used to generate electricity on-site or injected into the National Gas Grid. The residues of the AD process (digestate) will be blended with residual wastes from the initial autoclave process to produce a Solid Recovered Fuel (SRF). The SRF will be combusted on site to generate steam for the autoclave process. Excess steam will be used to generate electricity for export to the National Grid together with heat. The recovered plastics will then be used by the second part of the integrated resource recovery facility. A detailed description of the Sterecycle process is included at Appendix 1 of this submission.

1.13 The plastic generated by the Sterecycle facility will be subject to further sorting and cleaning, to remove any non-plastics which may have been ‘trapped’ by the initial autoclave process (within the autoclave vessels, under heat and pressure, the plastics deform and in doing so can trap material). The cleaned, shredded plastics will then be converted through catalytic conversion into hydrocarbon oils. The oils will be subjected to refinement to produce a number of grades of fuel for export off-site.

1.14 In addition, high quality waste plastics will be reprocessed on site utilising waste heat from the power generation of the Sterecycle operations.

**Site 57 – Land west of Beddington Lane**

1.15 Site 57 comprises two parcels of land of 3.9 ha and 2.0 ha under the freehold ownership of Sterecycle and Cappagh respectively. The two areas of land are separated by a strip of land,
under the ownership of Thames Water. Sterecycle has a legal right to use this strip of land for access to their site.

1.16 The Sterecycle site was formerly used for the spreading and disposal of sludge from the Beddington Sewage Treatment Works and in that context was used for the management of waste. The site was considered surplus to requirements by the operators of the treatment works, Thames Water, with the consequence that the site was sold to Sterecycle in 2010.

1.17 It is bisected by an access route serving the Beddington Farmlands Landfill site. There is an ability to relocate this access road, upon grant of planning for the development of the site. The access road will be relocated to the south between the Sterecycle and Cappagh sites.

1.18 The site currently comprises a flat area of land surrounded by a mature hedgerow around its perimeter. There are a number of redundant sludge lagoons, a vestige of the former use of the site. These lagoons are now drying out and naturally revegetating. The underlying stratum is undisturbed and comprises approximately 3 metres depth of sand and gravels overlying London Clay.

1.19 The Cappagh site is currently a green field site which lies adjacent on two sides to an existing industrial development. The site is level and bounded by mature hedgerows along its frontage to Beddington Lane.

1.20 Both sites front onto Beddington Lane in the immediate vicinity of a number of other waste management uses and, both in terms of their nature and character, are in keeping with the surrounds and form a logical extension of the Beddington Lane industrial.

**Site Status**

1.21 The site is designated as Metropolitan Open Land (MOL), primarily due to its nature conservation interest and proximity to the Beddington Farmlands area. The site is also designated as a Site of Metropolitan Importance for Nature Conservation (SMI).

1.22 London Borough of Sutton has been supportive of the development aspirations of the company and previously included the site, along with additional land to the south of circa 2 ha, for employment use within its Core Strategy and emerging Waste DPD. This required the de-designation of the MOL. The company believes, as did LBS in advancing the Site through its Core Strategy, that there is sufficient evidence on lack of suitable waste sites to demonstrate exceptional circumstances for the de-designation to take place. The Core Strategy did not, however, seek to limit the site's use for waste treatment and it is classed as proposed employment land.

1.23 The GLA has previously objected to the removal of any MOL, including Site 57. In the written objection to the Core Strategy, the GLA accepted that there may be exceptional circumstances for waste, in which case development in MOL would be acceptable.

1.24 The Inspector in considering the potential release of MOL land stated;

“In certain circumstances, there may be a case for altering a Green Belt boundary for some types of waste management facilities where no other suitable sites are available outside Green Belts, in particular where a local authority has a high proportion of Green Belt land and an inadequate range of suitable sites exist (PPS10, Companion Guide, paragraphs 7.34-35). Since under the LP, Metropolitan Open Land is synonymous with Green Belt it might be argued that that circumstance might apply in Sutton if no other suitable site is available. However,
Sutton together with 3 other London Boroughs, has produced a draft South London Joint Waste Development Plan Document which is shortly going out for public consultation on preferred sites and policies (DPD). Identifying a specific site for waste management in the CS before that DPD has run its course would offend the public consultation process and pre-judge the outcome of the emerging draft DPD.”

1.25 The Inspector considered that due to the emerging SLWP Waste DPD, he was not in a position to accept any evidence on requirements for waste facilities in Sutton. The requirement to evaluate the need to allocate sites within MOL was therefore placed entirely upon the emerging SLWP Waste DPD.

1.26 For these reasons, the release of Site 57 from MOL was not considered by the Inspector at the examination into the Sutton Core Strategy. This should not in any way prejudice its consideration through the SLWP given the Inspector’s reasoning and the absence of specific consideration of the site’s overall merits in the context of the shortfall in land for waste management purposes.

2  Basis of the Representations

2.1 Sterecycle and Cappagh are seeking the release of Site 57 from MOL and the land allocated within the SLWP for waste management use.

2.2 This release is sought on the basis that the Plan, as drafted, is not sound for a number of reasons. The consequence is that insufficient land is identified specifically to deliver the objectives of the strategy and that the area based approach to land release which the plan adopts does not provide the necessary certainty that sites exist that are suitable, available and deliverable. More specifically, the Plan fails to identify adequate land for the following reasons:

Existing Waste Management Capacity

2.3 The level of waste management capacity within the SWLP area has not been properly calculated resulting in an over-estimation of current capacity. Specifically;

(i) The existing waste management capacity identified within Table 3.1 of Technical Report 4 is not targeted towards meeting the need for Municipal Solid Waste (MSW) and Commercial and Industrial Waste (C/I) treatment capacity within South London and should not therefore be counted in full against the identified requirement.

- National figures for discarded equipment (including end of life vehicles) show that this category accounts for about 1.6% of all C/I arisings. The available capacity for ELV and Metal recycling in Table 3.1 of Technical Report 4 (the majority of the latter also being ELV) represents over 22% of the C/I arisings in South London. This represents a significant over concentration of such facilities given the likely level of arisings within the South London area;
- The level of existing capacity for composting that is included within the figure for existing capacity (circa 190,000 tonnes) far exceeds the requirement arising within the South London area;
- Viridor recycling and 777 recycling handle predominantly construction and demolition waste. Their capacity should not therefore be counted as contributing towards the management of commercial and industrial waste within the Plan area; and
Beddington Farmlands has no planning permission beyond 2016. It has a resolution to grant but this cannot be implemented in light of Thames Water’s representations to the effect that it will not sign. The existing capacity for composting and recycling (circa. 190,000 tpa) that is counted as existing capacity throughout the plan period will therefore cease in 2016.

If this capacity is counted in full towards the requirement for treatment of commercial and industrial waste and MSW within the South London area, the consequence is that a significant amount of the waste actually generated within the area will need to be exported for treatment. This has two consequences; firstly it will increase the distance that waste is required to travel contrary to the objectives of sustainable development and secondly, it will result in the need to retain existing transfer stations, thereby reducing the potential for such sites to be redeveloped for treatment use.

(ii) By virtue of proposed policy WLP3, existing waste management capacity can be redevelopment for alternative waste management use with lower capacity. There exists no certainty therefore that the existing capacity will be retained.

For these reasons, the existing waste management capacity should be properly assessed to ascertain its contribution towards the management of the MSW and C/I arisings forecast within the Plan and should only count towards treatment capacity to the extent that it caters directly for this need.

Translation of Capacity Requirement to a Land Requirement

2.4 The blanket assumption within the DPD of 61,950 tonnes treatment capacity per hectare fails to have proper regard to:

(i) The scale of the proposed facility. Smaller facilities generally have lower treatment capacities per hectare;

(ii) Significant development constraints that exist within an urban area such as South London, which are likely to reduce treatment capacity per hectare also on large sites. This is borne out, for example, by recent proposals at Benedict’s Wharf where proposed treatment capacities following redevelopment were 40,000 tonnes per hectare (excluding transfer station capacity); and

(iii) Type of facility required. Table 3.7 of the Technical Report clearly shows that different treatment capacities are achievable for certain uses. The assumption regarding 60,000 tpa is therefore predicated upon an unspecified, and untested assumption, regarding mix.

For these reasons, additional land needs to be identified within the plan period for waste management uses.

Redevelopment of Existing Waste Transfer Operations

2.5 The plan proposes that a number of existing Waste Transfer Sites are capable or being developed to treat rather then transfer waste, and at higher rates of throughput than the sites are currently able to accommodate.

(i) A number of the identified sites are severely constrained and are particularly unsuited for intensification (i.e. Villiers Road and Garth Road);
(ii) proposals previously submitted on the waste transfer sites identified for redevelopment show proposed treatment capacities significantly below the assumed 61,950 tpa/hectare (see 2.4(ii) above). Even if redeveloped, therefore, the sites are unlikely to deliver the forecast capacity upon which the plan relies; and

(iii) proposals already submitted on the proposed sites have been rejected and or withdrawn. This casts significant doubt upon the deliverability of the identified sites and demonstrates a lack of commitment on the part of the respective authorities to tackle the difficult decisions required to deliver sufficient waste management capacity within the South London area.

The consequence is that the redevelopment of the waste transfer sites is (a) uncertain and (b) is unlikely to yield the treatment capacity that has been assumed within the plan (c) will displace existing waste uses for which additional land will need to be sought. The Plan is unsound, due to the unsuitability of proposed sites.

**Reliance upon Identification of Industrial Areas**

2.6 The plan relies for the delivery of new waste management capacity upon the identification of general industrial areas within which land releases would be allowed rather than the identification of specific sites for development. This approach is unsound for the following reasons;

(i) The pre-existing policy framework already allows for waste management development within the identified areas. The Plan is not therefore creating a presumption in favour of waste management development within such areas but is simply reiterating a presumption that already exists;

(ii) Despite the existence of the aforementioned policy framework, since 2001 there has been in the four south London boroughs (a) a slight decline in the amount of land within industrial areas that is occupied by waste management and recycling uses and (b) an overall reduction in the amount of industrial land and (c) a reduction in the amount of industrial land and/or buildings that are available. It is therefore less likely, not more likely, that sites will be released in future. This scarcity is acknowledged within the Plan (paras 3.61 – 3.67). Where sites have been brought forward, few if any have gained consent; and

(iii) The industrial areas generally comprise small highly diverse land interests that will make land assembly for anything other than very small scale uses difficult. This reinforces concerns expressed in 2.4 above regarding the assumption of 61,950 tonnes capacity per hectare.

**Need to make specific allocations**

2.7 Given the failings of the Plan outlined in paragraphs 2.3 – 2.6 above, there is considered to be a requirement for the Plan specifically to identify sites for new waste management facilities in order to demonstrate that they are suitable, available and deliverable, and to provide the requisite degree of certainty. In the absence of this, the Plan is not considered to be sound for the following reasons:

(i) National policy and guidance places considerable emphasis upon certainty and deliverability. (PPS10 paragraphs 2, 3 (KPO 2), 16 – 18 + PPS10 Companion Guide
paragraphs 2.9 -2.10 and page 12). This is reflected in the Plan at paragraph 3.58, but not delivered; and

(ii) The points set out in 2.3 – 2.6 above clearly demonstrate the uncertainty that exists regarding delivery.

The Plan is, therefore, not consistent with national guidance.

2.8 We consider that the minimum necessary to make the plan sound would be the identification of specific sites or allocations to meet the requirements identified within the plan. The consequent identification of industrial areas suitable for waste management use would provide flexibility to ensure that adequate land is provided and to enable competition.

2.9 To support the submission and demonstrate both the suitability of Site 57 for release from MOL and its potential for development as a waste management facility, independent assessments have been commissioned on the following;

1) Ecology – the Ecology Consultancy
2) Landscape and Visual – Allen Scott
3) Highways – Odyssey

2.10 The range and scope of assessments has been determined following discussions with the London Borough of Sutton and having regard to concerns expressed at earlier stages in the Plan process. The inclusion of the resultant technical reports will, we believe enable a decision to be taken regarding the suitability of the site and will thereby enable decisions to be taken regarding its release from MOL an its identification for waste management use.

2.11 In support of these objective, and to inform the relevant assessment work, indicative designs have been prepared by architects Archial for the buildings to house the Sterecycle and Cappagh plants. The purpose of the design work is to demonstrate that the nature and scale of the proposed development, in the location at Beddington would not result in unacceptable impacts on the MOL or its setting or give rise to significant or unacceptable harm.

2.12 Both the aforementioned designs and the technical reports are included in appendices to this submission.

3 Waste projections

3.1 Sterecycle/Cappagh supports the Plan on its decision to use the London Plan 2008 apportionment figures as opposed to the ones identified in the Draft Replacement London Plan 2009 and agrees with the statement by the South London partnership that;

“the employment forecasts for South London represent a non- interventionist, straight line extrapolation of the pre- recession pattern and also pre- recession thinking and do not reflect the Mayor's objective of spreading employment growth to areas which have not experienced strong jobs increases in recent years”.

3.2 As the replacement London Plan is not expected to be published until late 2011, it is both prudent and reasonable for the South London Waste Plan to adopt the figures set out within the 2008 adopted version of the London Plan.

4 Existing Waste Management Capacity

4.1 The Plan is considered unsound given its reliance on existing waste capacity and the capability of this capacity to contribute towards meeting future requirements.

4.2 The existing waste management capacity identified within Table 3.1 of the Evidence Base 3 Technical Report is not aligned with the requirement for meeting the need of Municipal Solid Waste (MSW) and Commercial and Industrial Waste (C&I) treatment capacity required within the SLW Plan area in accordance with its self-sufficiency aims.

4.3 Of the stated 444,653 tonnes per annum (tpa) capacity identified (the total actually adds up to 444,635tpa), 95,498tpa is primarily for the management of Construction Demolition and Excavation waste. This comprises the Viridor Recycling and 777 Recycling facilities. This capacity should not therefore be included in the total. If removed, the total available treatment capacity for MSW and C&I waste reduces to 349,137tpa.

4.4 Secondly, the existing capacity set out in the aforementioned Table 3.1 includes 134,408tpa capacity for the management of End of Life Vehicles (ELV) and metals recycling. Much of the capacity for metals recycling, although classified separately, is also connected with the dismantling of ELV.

4.5 Within national classifications, ELV falls under the heading of discarded equipment. Based upon recent national statistics produced by DEFRA\(^2\), discarded equipment, including ELV, comprises only about 1.67% of all C/I waste arisings. What Table 3.1 demonstrates is that the existing capacity within South London for ELV and metals recycling actually equates to over 22% of the C/I apportionment for South London 2011. This represents a significant imbalance in the type of capacity provided and the management requirements for C/I waste arising within the South London area. This implies that significant volumes of such waste are being imported into the South London area. If this capacity is counted towards the existing recycling capacity, it reduces the amount of capacity to be identified to treat locally generated C/I waste. The consequence will be the need for locally generated C/I waste to be transported outside the South London area for management.

4.6 This conflicts with the statement at paragraph 1.22 in the Evidence Base 4 document that:

"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."

4.7 Similar concerns exist in respect of the existing capacity for composting that is shown in Table 3.1 of Technical Report 4. This amounts to a current total capacity of 194,000tpa compared with arisings in the SLWP Area of only 95,000tpa\(^3\). Additionally there is an assumption that the Viridor AD plant of 30,000tpa will become available for the treatment of compostable waste, giving a total capacity of 224,000tpa, although this facility has not yet been formally approved. The consequence, as for ELV and metal recycling is that (a) there will be significant imports of

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\(^2\) Defra - Survey of Commercial and Industrial Waste Arisings 2010 – Interim Results November 2010  
\(^3\) Data derived from Evidence Base 4 Technical Report
kitchen and green waste into the South London area, and (b) that significant quantities of other forms of MSW and C/I waste will need to be exported for treatment elsewhere.

4.8 A further concern relating to the existing waste capacity pertains to the assumptions regarding Beddington Farmlands. The footnote to Schedule 1 entitled Existing Licensed Waste Management and Waste Transfer Sites in the Waste Plan area, as protected by the Mayor of London’s Plan states;

“All facilities on Beddington Farmlands have temporary permission only. All are due to expire in 2023, just beyond the lifetime of the plan. After this the land will be incorporated into the Wandle Valley Regional Park.”

4.9 This is also stated at paragraph 3.51 of the Plan;

“... the temporary planning permission for the landfill and associated waste management facilities at Beddington Farmlands, Sutton will expire in 2023”.

and at paragraph 4.23;

“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.”

4.10 Based upon this, the existing capacity at Beddington Farmlands, amounting to 189,451 tpa, is assumed to be available throughout the plan period.

4.11 The current planning permission is, however, due to expire in 2016, with a twelvemonth period allowed thereafter for the removal of plant and equipment and the reinstatement of the site to the Wandle Valley Regional Park. This applies to all current facilities on the Beddington site which are tied to the life of the landfill facility.

4.12 Whilst the Local Planning Authority resolved to grant planning permission for both a lateral and temporal extension of the activities in October 2008, which would have extended the life of the planning permission until 2023, the S106 Agreement required to be entered into remains unsigned and hence the permission has never been issued. The S106 requires not only the agreement of Viridor and the LPA but also Thames Water as landowner. In recent correspondence they have stated;

“I can confirm on behalf of Thames Water Utilities Ltd (TWUL) that sludge lagoon 5 and the eastern half of lagoon 6 are outside of the area leased to Viridor and that TWUL has no intention of releasing this area from operational use for the foreseeable future. To this end it is not our intention to complete the s.106 agreement associated with planning application D2005/54794.”

A copy of this correspondence is included at Appendix 9.

4.13 The areas to which this correspondence refers comprise the area of the proposed lateral extension of the landfill. Without this land the additional landfill capacity cannot be realised and the proposed extension of time is not required. In any event, in the absence of Thames Water signing the S106 agreement, the permission extending the life of the site cannot be issued. The aforementioned capacity therefore needs to be discounted after 2016.

4.14 The final concern regarding the reliance of the Plan upon the figure for existing capacity relates to the combined effect of the objective of the Plan to manage waste as high up the hierarchy as
possible and the assumption regarding treatment capacity achievable per hectare. Policy WP3 safeguards existing waste management capacity. However, it also includes the rider that;

“In accordance with the plan’s objectives and Policy WP1, 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.”

4.15 The consequence of this rider is that whilst the overall area given over to waste management uses may be protected, the capacity figure that is assumed to exist is not. This is of particular relevance given concerns regarding the translation of capacity requirement to land requirement as described fully within section 5 below.

4.16 Lastly, Table 3.1 of the SWLP is incorrect as it double counts the existing capacity available for recycling in 2021. If the recycling targets of 50% and 70% are correctly applied to the MSW and C/I figures for 2021, this gives rise to a total capacity requirement of 830,871 tpa. Based upon the stated figure for existing capacity, which we have challenged throughout this section, this results in a requirement for additional recycling/composting capacity of 386,218 tpa and not the 148,896 tpa stated in the table.

4.17 In conclusion, allowing only for the removal of the CD&E capacity which is not available to treat MSW and C/I arisings and the Beddington Farmlands facilities which on the basis of their current planning permissions will not be available after 2016, the existing capacity would fall from 444,635 tpa to 229,986 tpa. If a further reduction were made for the over-reliance upon ELV and metal recycling capacity, this would reduce further, potentially by as much as 125,000 tpa.

Implications of the reduction in existing capacity

4.18 The implications of this for the Plan are threefold.

1. the reliance on the higher figure for existing waste management capacity results in a significant underestimate of the amount of new land required to meet the apportionment for MSW and C/I waste. Even using the Plan’s own figure of 61,950 tonnes capacity per hectare of land, the loss of about 340kt of existing capacity would require an additional landtake of 5.67 hectares. The Plan makes no such provision.

2. the consequence of this would be significant reliance upon treatment capacity being provided beyond the boundaries of the four boroughs in order to meet the requirement for locally generated MSW and C/I arisings within South London. This not only places an additional burden on neighbouring authorities to provide facilities, but is likely to result in waste having to be transported over longer distances through London; and

3. the requirement for waste to continue to be transported outside the South London area calls into question the assumption inherent within the Plan that waste transfer facilities will not be required to the current extent and are therefore available for redevelopment for treatment rather than transfer.

4.19 Objection is therefore raised in respect of Key Issue 3 and in particular paragraphs 3.33 – 3.34 and Table 3.1 having regard to the over reliance of the Plan upon existing waste management capacity and the consequent underestimation of the land take required to deliver the waste apportionment.

Note: If arisings of ELV in South London were assumed to be in line with national figures, then only about 10,000 tpa of the existing capacity would be counted against the C/I waste apportionment figure. Existing capacity in this case would be reduced by a further 125,000 to little under 105,000 tpa after 2016.
4.20 For the reasons set out above, the existing waste management capacity needs properly to be reassessed to ascertain its contribution to the overall requirements for management of the MSW and C&I arisings forecast within the Plan and how it contributes to the self-sufficiency policy in terms of balance of waste streams and materials. Existing capacity should only be counted towards this requirement to the extent that it caters for these needs.

5 Translation of Capacity Requirement to Land Requirement

5.1 Sterecycle/Cappagh objects to the Plan on the grounds that the blanket assumption of 61,950 tonnes treatment capacity per hectare fails to have proper regard to:

1. The scale of the proposed sites/facilities - smaller sites/facilities generally have lower treatment capacities per hectare;

2. Significant development constraints that exist within an urban area such as South London, which are likely to reduce treatment capacity per hectare also on large sites.

3. Type of facility required. The assumption regarding 61,950 tpa is predicated upon an unspecified and untested assumption regarding mix.

For these reasons, additional land needs to be identified within the plan period for waste management uses.

5.2 Smaller facilities generally achieve lower treatment capacities per hectare. Table 5.1 below derives from based on Table 3.7, page 42 of the Evidence Base Study 4 - Technical Report and shows facilities of 1.5 hectares or less. It can be seen that the average throughput per hectare for sites of 1.5 hectares or less is approximately 45,000 tonnes per annum, 25% less than the blanket average assumption of 61,950 used for the Plan.

### Table 5.1: Tonnage per Hectare on Sites of 1.5 hectares or less

<table>
<thead>
<tr>
<th>Type of waste management facility</th>
<th>Land take (ha’s)</th>
<th>Potential tonnage</th>
<th>Potential tonnage / ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials Recovery Facility (MRF)</td>
<td>1.20</td>
<td>50,000</td>
<td>41,667</td>
</tr>
<tr>
<td>Materials Recovery Facility (MRF)</td>
<td>1.50</td>
<td>50,000</td>
<td>33,333</td>
</tr>
<tr>
<td>Materials Recovery Facility (MRF)</td>
<td>1.00</td>
<td>85,000</td>
<td>85,000</td>
</tr>
<tr>
<td>Materials Recovery Facility (MRF)</td>
<td>0.65</td>
<td>84,000</td>
<td>129,231</td>
</tr>
<tr>
<td>In-vessel composting (IVC)</td>
<td>1.00</td>
<td>20,000</td>
<td>20,000</td>
</tr>
<tr>
<td>In-vessel composting (IVC)</td>
<td>1.50</td>
<td>25,000</td>
<td>16,667</td>
</tr>
<tr>
<td>Anaerobic Digestion (AD)</td>
<td>1.00</td>
<td>40,000</td>
<td>40,000</td>
</tr>
<tr>
<td>Anaerobic Digestion (AD)</td>
<td>1.50</td>
<td>50,000</td>
<td>33,333</td>
</tr>
<tr>
<td>Mechanical Biological/Heat Treatment /Pre-Treatment (MBT)/(MHT)/(MPT)</td>
<td>1.50</td>
<td>50,000</td>
<td>33,333</td>
</tr>
<tr>
<td>Mechanical Biological Treatment (MBT)</td>
<td>1.50</td>
<td>75,000</td>
<td>50,000</td>
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<td>60,000</td>
<td>60,000</td>
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<tr>
<td>Mechanical Heat treatment (MHT)</td>
<td>1.00</td>
<td>100,000</td>
<td>100,000</td>
</tr>
<tr>
<td>Gasification and Pyrolysis</td>
<td>1.00</td>
<td>10,000</td>
<td>10,000</td>
</tr>
<tr>
<td>Gasification and Pyrolysis</td>
<td>1.00</td>
<td>50,000</td>
<td>50,000</td>
</tr>
<tr>
<td>Gasification and Pyrolysis</td>
<td>1.50</td>
<td>50,000</td>
<td>33,333</td>
</tr>
<tr>
<td>Pyrolysis</td>
<td>0.98</td>
<td>60,000</td>
<td>61,224</td>
</tr>
<tr>
<td>Thermal treatment</td>
<td>1.50</td>
<td>50,000</td>
<td>33,333</td>
</tr>
<tr>
<td><strong>All technologies</strong></td>
<td><strong>20.33</strong></td>
<td><strong>909,000</strong></td>
<td><strong>44,712</strong></td>
</tr>
</tbody>
</table>
5.3 This is significant of itself in that the figure of 61,950 tpa capacity per hectare is used as the basis for determining new land take requirements for waste management uses. If this figure overestimates the capacity per hectare then the Plan will ultimately underestimate the land requirement needed to deliver the apportionment.

5.4 It is, however, of even greater significance having regard to the likely reliance of the Plan on sites coming forward from within multi-occupier industrial areas, thereby greatly limiting the potential availability of large sites.

5.5 For example, looking at Site 102 of the Plan, ‘Burley Way, Lysander Road and Imperial Way Industrial Areas’, it can be seen that there are approximately 30 units within the 24.69 hectare site. This equates to an average of about 0.8 hectare per unit. The same applies to Sites 351/352/353 - Chessington Industrial Estate, with approximately 50 units on 34.91 hectares (equating to 0.7 hectares per unit); Sites 641/651/652 – Durnsford Road and Plough Lane Industrial Area, with at least 30 units on 25.55 hectares (0.9ha/unit); Site 702 – Garth Road Industrial Area, with at least 13 units over 5.6 hectares (0.4ha/unit); Site 69 - Willow Lane Industrial Estate, with at least 60 units over 41.45 hectares (0.7ha/unit).

5.6 Similarly, looking at Table 3.1 of the Evidence Base Study 4 - Technical Report, it can be seen that the average size of existing waste management facilities within the South London Waste Plan area is 0.8 hectares per site. This includes Viridor’s 5.02 hectare site, without which the average size per site would reduce to 0.4 hectares.

5.7 Not only does this severely restrict the potential for such areas to accommodate modern waste management uses without recourse to a land assembly exercise taking place (see section 7 of these representations), it makes it significantly less likely that strategic or larger scale uses can or will be developed, thereby reducing the potential capacity per hectare.

5.8 Secondly, Sterecycle/Cappagh raises objection on the grounds that the Plan fails properly to have regard to the significant constraints associated with developing sites in urban areas such as South London. Such constraints are in practice likely to reduce the potential capacity per hectare not only on small sites, but on large ones as well. For example, SITA’s planning application for Benedict Wharf (site 126) is for a 54,000 tpa MRF and 100,000 tpa AD, totalling 154,000 tpa on a 3.87 hectare site. This means a capacity of less than 40,000 tonnes per hectare, well below the average of 61,950 tonnes per hectare relied upon by the Plan. The remaining element of SITA’s application is for a 40,000 tpa transfer station for pre-sorted recyclables, which should not count towards the apportionment. Even if this were included, it would still account for only 50,000 tonnes per hectare rather than the 61,950 used in the Plan.

5.9 Notwithstanding this, the scale of the proposed Anaerobic Digestion facility has led LB Merton to resolve to refuse the planning permission due to visual impact considerations, thereby confirming both the constraints on maximising capacity per hectare in urban areas and the uncertainty regarding the potential suitability of such sites.

5.10 Similar considerations apply with regard to Site 17 - Beddington Heat and Power. The Plan states that the development of a 30,000 tpa gasification facility is proposed on a 0.17 hectares site, part of a larger 2.42 hectares site owned by Country Waste. The Plan fails to acknowledge that the 0.17 hectares only includes the building for the gasification units, but excludes the area required to deliver the material, store it and chip it. This will occupy part of the larger 2.42 hectare site and, as it is required as an integral part of the operation of the gasification facility, should have been accounted for in determining the capacity per hectare.
5.11 A very similar facility is currently being developed by Kedco Howard in Edmonton, North London. It will be utilising a 1.5 hectare site for a 60,000 tpa gasification facility, equating to 40,000 tonnes per hectare. This is in line with both SITA’s plans for Benedict Wharf and our assessment in Table 5.1 above.

5.12 Furthermore, it should again be noted that the applicant has appealed this application based upon the failure of the London Borough of Sutton to issue a decision. This again illustrates the significant uncertainty surrounding even the redevelopment of existing waste management facilities. This will be assessed further in Section 6.

5.13 Finally, Table 3.7 of the Evidence Base Study 4 - Technical Report clearly shows that different treatment capacities are achievable for different waste treatment technologies. The assumption regarding 61,950 tpa per hectare is therefore predicated upon an unspecified and untested assumption about the technology mix, rather than assessing what technologies are needed to treat the waste arising within the Plan’s area.

5.14 A similar exercise undertaken in respect of the North London Waste Plan looks both at the range and type of facilities required and, based upon this, the likely capacity created per hectare. The result of that exercise was an average capacity per hectare of 40,000tpa, significantly below the assumed figure of 61,950tpa. used in the SLWP. The basis of the calculation in the North London WLP is set out in Table 5.1 below.

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Throughput</th>
<th>Land take per facility</th>
<th>Throughput per hectare</th>
</tr>
</thead>
<tbody>
<tr>
<td>MRF</td>
<td>42,000</td>
<td>0.90</td>
<td>46,667</td>
</tr>
<tr>
<td>Composting</td>
<td>19,000</td>
<td>1.25</td>
<td>15,200</td>
</tr>
<tr>
<td>MBT</td>
<td>125,000</td>
<td>1.75</td>
<td>71,429</td>
</tr>
<tr>
<td>AD</td>
<td>15,000</td>
<td>1.00</td>
<td>15,000</td>
</tr>
<tr>
<td>Gasification/Pyrolysis</td>
<td>114,000</td>
<td>2.25</td>
<td>50,667</td>
</tr>
<tr>
<td>Average</td>
<td></td>
<td></td>
<td><strong>39,792</strong></td>
</tr>
</tbody>
</table>

5.15 If the figure of 40,000tpa per hectare is adopted, which we consider to be more realistic given the constraints on site size and land use considerations outlined above, the landtake required in 2011 increase from 7.4 hectares to 11.5 hectares and in 2021 from 11.8 hectares to 18.2 hectares.

5.16 For the reasons set out above, objection is therefore raised in respect of Key Issue 3 and in particular paragraphs 3.35 and Table 3.1 having regard to the over reliance of the Plan upon existing waste management capacity.

6 Redevelopment of the Existing Waste Transfer Operations

6.1 The Waste DPD proposes in paragraph 3.36 that as more waste will be treated locally over the plan period, there will be less of a requirement for waste transfer facilities, to transfer waste out of the plan area. The argument is extended in paragraph 3.37 that within the Plan area, the total land occupied by transfer facilities is over 30 ha of which 8 ha has been identified as “likely to be turned into waste management facilities during the lifetime of the plan”. The Plan takes the 8 ha figure and deducts it from the 14 ha overall requirement to derive a figure of 6 ha which needs to be identified to meet the London Plan’s waste apportionment or 7 ha to meet
the Waste DPD’s calculated 100% waste arisings. The 14 ha target figure has been questioned previously in these representations.

6.2 The ability to rely on 8 ha of land being released from the existing Waste Transfer Station sites is considered to be highly optimistic and has not been justified within the Plan.

6.3 Concerns over the potential of the waste transfer sites was highlighted in a review of potential sites undertaken by Sterecycle for the Sutton Core Strategy EiP in September 2008 and updated in May 2009. This was followed by further report in 2010 by Gerald Eve Chartered Surveyors. Both reports concluded that the sites were heavily constrained and that further intensification of the use would be difficult to achieve. Specifically, the updated Sterecycle report concluded in relation to the Benedict Wharf site;

“The one site which has the size potential and could be considered available for a waste use is Benedict Wharf, which extends to circa 4.49 ha. This site suffers from a poor access onto a constrained local highway. In addition, immediately adjacent to the site is located a primary school and residential properties. The area is relatively open, with few industrial buildings, save for those present on the small industrial estate. Any further intensification of use of the site is considered likely to be unacceptable.

Since this assessment was undertaken, planning permission to intensify the use of the Benedict Wharf facility has been refused by the London Borough of Merton. These reports are considered further in Section 7.

6.4 In the following paragraphs we will demonstrate the nature and extent of potential constraints affecting each of the sites identified within Evidence Base Study 4 Table 3.8 entitled “Existing Transfer Stations which are identified as potential sites for redevelopment as management facilities during the Waste Plan’s lifetime”. In a number of cases, these constraints have already led to applications being refused by the respective authorities, highlighting the uncertainty attached to their delivery.

**Villiers Road**

6.5 There are currently three different users of the site; SITA, Veolia and Quadron. The uses on site include a Waste Transfer Station and HWRC. The HWRC would either require integrating into any new development, or relocated elsewhere.

6.6 The site is located immediately adjacent to a major residential area. Whilst a new access was formed onto Villiers Road to replace the use of Athelstan Road, this remains comparatively constrained and has its junction with Villiers Road within a predominantly residential area. The site currently has a permit to accept 109,200 tonnes of waste per annum, although the latest waste tonnages for the site (2008) indicate that the site was only accepting approximately half of the maximum permitted by the permit. Any significant increase over this is anticipated to give rise to unacceptable traffic issues.

6.7 Given the above, it is considered that Villiers Road is not deliverable, as defined by paragraph 2 of PPS10.

**Garth Road**

6.8 This comprises a transfer station (operated by LB Merton), an HWRC operation (operated by EWC) and Merton Council’s highway’s depot with salt storage.
6.9 The site is poorly accessed and is located within a largely residential area. Extensive new residential development is taking place on the site of the former Worcester Park Sewage Treatment Works (the Hamptons) to the west, within a distance of less than 50 metres from the site boundary. This comprises a mix of flats and houses of predominantly three storeys in height. With existing housing areas at a similar distance to the south and the north east, this is likely significantly to constrain any potential for the intensification of the use of the site or its use for treatment rather than transfer purposes.

6.10 As the Evidence Base Study 3: Deliverability of Sites November 2010 confirms, any redevelopment of this site will require relocation of some or all of the current users. The site extends to circa 2ha, however the existing Waste Transfer Station only occupies 0.4 ha, with the bulk of the existing site (1.6 ha) taken up by the highways depot. The amount of land taken up by the highways depot is almost as large as the average land take attributed to the three WTSs. This redevelopment of the site is therefore not relying so much on the existing Waste Transfer Station becoming redundant, but on the relocation of a highways depot, which is unlikely to become surplus to requirements and would be difficult to relocate due to the size requirements of the facility.

6.11 Whilst the existing occupiers could on an individual basis be relocated to alternative, smaller sites, there will be difficulty in identifying locations to re-site an HWRC in particular, due to the traffic implications associated with these operations. The opportunities this site presents are therefore limited and does not give any certainty of deliverability.

Factory Lane Transfer Station

6.12 Whilst having the benefit of a good access onto the A236 avoiding residential areas, the site configuration is broadly triangular, with maximum lengths of 150m x 120m. The shape and size of the site will restrict opportunities to locate any operations with a large capacity.

6.13 The three sites are owned by the local Councils. Their availability is dependant upon the contract currently in the process of being procured for the SLWP municipal solid waste. This procurement has been ongoing since May 2009. Whilst the bidders have been shortlisted down to three, in October 2010, the Government announced that it was withdrawing its £112.9M PFI funding award from the project. SLWP has confirmed it intends to continue with the procurement, but the lack of funding will inevitably place uncertainty that the contract will be awarded.

6.14 If the contract is not awarded, then the release on one of the sites is highly unlikely. This uncertainty on the contract, the questionable viability of the sites and knock on impact of having to relocate existing services in any event indicates that it is not appropriate to rely on these sites for delivering certainty to the Waste DPD.

Country Skip Hire

6.15 This site comprises of a Waste Transfer Station which accepts construction, demolition and excavation wastes (CD&E). The operations are not, however, confined to transfer of this waste, but rather they are for the recycling and recovery of recyclates and production of secondary aggregate and soils. It is incorrect therefore to consider this as a WTS that is likely to be surplus to requirements as additional recovery and recycling operations come on stream during the plan period. The development of the Country Skip site would result in the displacement of an existing treatment facility, which will require relocating elsewhere within the plan area.
6.16 The site also has a chequered history of development proceeding without planning permission first being secured. Indeed at the time of writing (February 2011) the site is currently operating without any extant planning permission in place. A planning resolution to grant was made in October 2009. The decision requires the completion of a S106 agreement which is still outstanding. The previous planning permission for the use of the site as a waste recycling and transfer facility was granted on a temporary basis which expired in January 2009.

6.17 An extract from the application reads “It is intended that, if permitted, the new development and installations would continue to receive and process similar mainstream waste categories to those currently handled by the open WTS and materials recycling facility – namely, Construction, Demolition and Excavation (CD&E) wastes”. CD&E wastes are excluded from the apportionment and therefore should not be included in the future capacity calculations. This again supports the contention that there is no certainty that any future redevelopment of the site, even if it was found to be permissible, is likely to provide capacity for MSW or C/I wastes.

6.18 There is also a planning application for a gasification plant on site, submitted by Beddington Heat and Power, which is also for the treatment of CD&E waste. The application is currently being appealed on the grounds of non-determination given the failure of the London Borough of Sutton to reach a decision on the application. It is understood from discussions with officers that LBS will contest the appeal.

6.19 It is noted that this site represents circa 30% of land considered secured in the Waste DPD, yet as confirmed by Table 2 of the Evidence Base Study 3 on Deliverability that no meetings were held with the owners or operators of the site. Given the planning history of the site, it is unrealistic to assume that the site will be available for redevelopment to handle MSW and C/I waste within the plan period.

**Benedict Wharf**

6.20 This is a site owned and operated by SITA. The site currently comprises a ‘clean’ MRF (sorting papers, magazines, plastic, etc) and a waste transfer station. The WTS has a maximum capacity of 275,000 tonnes per annum and the MRF has an annual capacity of 54,320 tonnes.

6.21 A planning application was submitted in October 2008 for the redevelopment of the site to increase the size of the MRF to one with a capacity of 80,000 tonnes per annum, reduce the size of the WTS to 40,000 tonnes per annum and develop a new anaerobic digestion plant which would accept 100,000 tonnes per annum.

6.22 Planning permission was refused in October 2010, with the reasons for refusal given as the impact of the scale of the development on the adjacent conservation area.

6.23 Given the refusal of planning permission, the inclusion of this site as one the Waste DPD states in paragraph 3.37 to be ‘likely to be turned into waste management facilities during the lifetime of the plan’ is inappropriate and cannot be considered to be deliverable. This uncertainty is of even greater significance given that Benedict Wharf at 3.89ha provides almost half of the 8 ha that the Plan considers has been identified as deliverable land. This represents a significant over-reliance on this site by the DPD.

**Delivery of Capacity**

6.24 In addition to concerns over the redevelopment potential of the sites identified in Table 3.8 of Evidence Base 4, Sterecycle/Cappagh would also object, for the reasons set out in section 5
above, on the grounds that even if redeveloped, the existing transfer station sites are unlikely to yield the capacity assumed.

6.25 As has been identified previously, one of the sites, Benedict Wharf, has had its planning application (reference 08/P2724) for "Formation of an eco-park comprising an extension to existing MRF, a new anaerobic digestion and integrated In-Vessel composting facility, new bulking/waste building and ancillary buildings and infrastructure" refused. There is also uncertainty about the future of the Country Skips site, with one application being appealed and the other awaiting completion of a legal agreement which has been outstanding since October 2009, both of which in any event are for the management of CD&E waste only. There is therefore significant doubt on the deliverability of these sites. Neither of the redevelopment proposals achieves anything close to the 61,951 tonnes capacity per hectare which is assumed, and relied upon by the Plan in determining future land take requirements.

6.26 The consequence is that the redevelopment of the waste transfer sites is (a) uncertain and (b) is unlikely to yield the treatment capacity that has been assumed within the plan (c) will displace existing waste uses for which additional land will need to be sought.

6.27 For the reasons set out above, objection is therefore raised in respect of Key Issue 3 and in particular paragraphs 3.36 – 3.38 and Table 3.1 having regard to the uncertainty over the deliverability of existing waste transfer sites and the unlikelihood that they will yield the capacity relied upon by the Plan.

7 Reliance upon Identification of Industrial Areas

7.1 Sterecycle/Cappagh considers that the over-reliance upon the identification of general industrial areas as opposed to the identification of specific sites, undermines the effectiveness of the Plan and results in a lack of justification concerning the suitability, availability and deliverability of the sites needed to deliver the strategy. For this reason the Plan is considered unsound.

7.2 A review of potential sites was undertaken by Sterecycle for the Sutton Core Strategy EiP in September 2008 and updated in May 2009. This was followed by further report in 2010 by Gerald Eve Chartered Surveyors. Both reports assessed the potential of the sites put forward by the Waste DPD to provide 6 ha of development land. The findings of the reports are set out below;


72. From the assessments undertaken it is that there are few sites in the South London Area that would be considered appropriate to locate a strategic waste management facility. The basis of the assessment was to evaluate existing industrial and business parks, in accordance with the requirements of the London Plan. When these sites were scrutinised against a number of relevant criteria the majority were able to be ruled out for a variety of reasons but predominantly on the grounds of insufficient area and impact on the local amenity.

73. The South London Area is highly populated and therefore all sites would have an impact on some local residential properties either as a direct environmental impact e.g. noise, dust or odour from a facility, where properties were within 100m, or a high degree of visual impact would arise on areas where existing buildings were low level or there were
residential properties located in elevated positions. The main issue would be associated with traffic. A large number of sites could only be accessed through residential areas or internal access roads were insufficient to allow safe passage of HGVs.

74. There were two areas which from a desk and detailed site appraisal could be considered as being suitable, namely Kingston Area 7 and Sutton Area 10, however there was no redundant land or redevelopment being undertaken in either area. This identifies one of the most difficult aspects of site identification for waste management facilities in the London area generally, availability. Whilst the nature of the assessment can only offer a ‘snap-shot’ of availability of land, it is considered that this is a long-term problem for the area. Reliance on release of previously developed land from within existing industrial estates for development of waste facilities is likely to prove futile. In the limited cases where plots were being redeveloped they were either too small to consider being appropriate, or where larger areas were to be released, they were being redeveloped for mixed use, which would give rise to higher rental/land values. In these cases, waste management operators would not be able to compete with retail and office rental values.

75. In conclusion, none of the sites assessed revealed readily available suitable sites for locating strategic waste management facilities within the appraisal area. This has implications for the South London area and future waste policies. Deliverability is a key element of policy formulation. Where there is no reasonable degree of certainty that sites will be released for redevelopment, then reliance upon them to deliver essential infrastructure will be unsound. The continued reliance on existing allocated sites for the location of strategic waste management facilities is therefore inappropriate and additional locations should be identified.”

Waste Facilities Site Assessment Report Update (to take account of additional sites proposed by the PFI Waste Contract) – Sterecycle May 2009

“All of the sites were considered to be inappropriate for allocating as a strategic waste site, due to a variety of factors. Where the site areas were considered to be sufficiently large, they comprised a number of individual users, which would make deliverability of the site almost impossible without recourse to CPO powers. The one site which has the size potential and could be considered available for a waste use is Benedict Wharf, which extends to circa 4.49 ha. This site suffers from a poor access onto a constrained local highway. In addition, immediately adjacent to the site is located a primary school and residential properties. The area is relatively open, with few industrial buildings, save for those present on the small industrial estate. Any further intensification of use of the site is considered likely to be unacceptable.

Following the review of the additional sites put forward in the South London Waste Plan Issues and Options Consultation draft, the conclusions of the original report remain, in that there are no sites within the South London Waste Partnership suitable to locate a strategic waste treatment facility.”

7.3 The issue of multiple ownership and the average plot size of sites within a number of the identified industrial areas has been raised previously in Section 5, as has the impact that this is likely to have on the average capacity per hectare that is achievable. This calls into question the suitability of sites to accommodate a wide range of waste management uses that require larger sites, the availability of sites given multiple ownership and the failure to date to identify specific sites, the deliverability of sites given both the constraints identified and the fact that
smaller uses are generally less viable and the contribution that such sites can actually make in terms of average capacity per hectare.

7.4 The policy framework that has been in place for much of the past ten years already presumes in favour of the release of sites within the major industrial areas for waste management purposes. This is reflected in the policies of the four Boroughs within their Unitary Development Plans which are included at Appendix 3. The main provisions of these policies are;

**Sutton UDP Policy PNR20 - Sites for Waste-Related Development**

“The council will favourably consider waste-related development on sites within industrial areas or within extensive areas of despoiled, contaminated, previously developed or derelict land or a history of a waste-related use other than restored landfill sites.”

**Merton UDP Policy PE.10: Waste Facilities**

“Applications for waste management facilities, such as facilities for the storage of waste or refuse, waste treatment and reprocessing plants including concrete crushers, incineration plants and waste transfer/bulk reducing stations, will not be permitted outside the designated industrial areas. Within these areas, the council will assess applications for waste management facilities against …. criteria.”

**Croydon UDP Policy EP8**

“Development of waste management facilities will be permitted in the following locations:

i) Purley Way North and South and Marlpit Lane Strategic Employment Locations;

ii) The other Employment Areas;

iii) Existing industrial and warehousing sites elsewhere in the Borough, and;

iv) Existing waste management facilities.”

**Kingston UDP Policy MW1 Development of Waste Management Facilities**

“The Council encourages the appropriate development of recycling and composting facilities and may use the community benefit policy to secure further facilities. Proposals for other waste management facilities should not restrict waste minimisation, recycling or composting initiatives. Apart from composting facilities, new waste management facilities will not be permitted in Green Belt, Metropolitan Open Land and areas of local open space.”

7.5 The London Plan has also consistently contained policies favouring the location of waste management developments on industrial sites. In the 2004 plan policy 4A.3 required that;

“UDP policies should incorporate the following criteria to identify sites and allocate sufficient land for waste management and disposal:

- primarily using sites that are located on Preferred Industrial Locations or existing waste management locations.”

This policy was retained in the 2008 plan as Policy 4A.23.

7.6 Therefore, the policy framework that has existed for most of the last ten years already allows for the development of waste management uses within the industrial areas identified in the South
London Waste Plan. The Plan therefore adds nothing in this context to the existing policy framework.

7.7 More importantly, the existing policy framework has failed to deliver the range and quantity of sites that are necessary to bring about the step change in waste management practice within South London.

7.8 The latest Industrial Land Baseline Report produced by URD and DTZ on behalf of the London Development Agency and the GLA in June 2010 identifies trends in industrial land over the period 2001 - 2010. Table 7.1 below sets out the relevant entries for the South London Boroughs.

Table 7.1 Trends in Industrial Land

<table>
<thead>
<tr>
<th>(figures shown are in hectares)</th>
<th>2001</th>
<th>2006</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial Land in use for Waste Management and Recycling</td>
<td>55.0</td>
<td>51.3</td>
<td>51.3</td>
</tr>
<tr>
<td>Total Industrial Land</td>
<td>1181.2</td>
<td>1138.1</td>
<td>1130.2</td>
</tr>
<tr>
<td>Vacant Land and Buildings</td>
<td>63.7</td>
<td>47.9</td>
<td>35.8</td>
</tr>
</tbody>
</table>

7.9 What this shows is that despite a positive policy framework at both the London and Borough level, there has actually been a slight reduction in the amount of industrial land classified as being in use for waste and recycling uses within the four boroughs. Furthermore, it shows that the amount of vacant land within the industrial areas has fallen quite markedly (nearly 45%) at the same time as a slight overall contraction in the supply of industrial land. Competition for available land and buildings has therefore increased over the period.

7.10 Whilst this is acknowledged within the Plan at paragraphs 3.61 – 3.67, the Plan fails subsequently to justify how, in the light of the tight industrial land supply, sufficient certainty exists regarding future land releases.

7.11 The conclusion that should rightly be drawn from the analysis of land supply figures is that it is now less likely that waste management uses will come forward within existing industrial estates than it was 10 years ago. Unless a more pro-active and certain spatial framework is put in place therefore, it is unlikely that the step change in waste management practice required to deliver the recycling, recovery and landfill diversion targets for both MSW and commercial and industrial waste will be met.

7.12 Certainly the Plan fails to provide the positive framework and the requisite degree of certainty required by Government guidance that sufficient land will be available during the plan period to enable the right type of facilities to be developed at the right time and in the right place.

7.13 Objection is therefore raised to policy WP4 on the grounds that the areas identified in Schedule 2 have not been demonstrated to be suitable, available and deliverable and on a sufficient scale to meet the apportionment. For this reason, the plan is not considered to be justified or effective and is therefore considered unsound.

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5 For example PPS10, paragraph 2
8 Need to make Specific Allocations

8.1 Sterecycle/Cappagh objects to the Plan on the grounds that it is not consistent with national policy. The Plan fails to have sufficient regard to the deliverability of the strategy and in particular fails adequately to allocate sufficient land to ensure that the waste management requirements identified within South London are met within the Plan period.

8.2 National policy places significant emphasis upon certainty, deliverability and flexibility.

8.3 PPS10 states at paragraph 2;

“Positive planning has an important role in delivering sustainable waste management:…..

▪ by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time.” My emphasis

8.4 Its key planning objectives at paragraph 3 include a requirement to;

“provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities.” My emphasis

8.5 Para. 16 states;

“The core strategy of a waste planning authority should set out policies and proposals for waste management in line with the RSS and ensure sufficient opportunities for the provision of waste management facilities in appropriate locations including for waste disposal.” My emphasis

8.6 Again it needs to be emphasised that the current plan performs the role both of a waste core strategy and site allocations document. Whilst Figure 1.2 places it as subordinate to the four borough Core Strategies, it is clear from the Inspector’s report into the Sutton Core Strategy that strategic waste management issues were not considered within these documents and that all matters, both strategic and locationally specific, need properly to be considered in the context of this Plan. Whilst paragraph 16 of PPS10 therefore refers to the need for Core Strategies to ensure sufficient opportunities for the provision of waste management facilities, this plan needs properly to identify the sites upon which those opportunities can and will be realised.

8.7 PPS10 therefore states at paragraph 17;

“Waste planning authorities should identify in development plan documents sites and areas suitable for new or enhanced waste management facilities for the waste management needs of their areas. Waste planning authorities should in particular:

▪ allocate sites to support the pattern of waste management facilities set out in the RSS in accordance with the broad locations identified in the RSS; and,

▪ allocate sites and areas suitable for new or enhanced waste management facilities to support the apportionment set out in the RSS.”

8.8 In doing so, waste planning authorities should (inter alia);
“avoid unrealistic assumptions on the prospects, for the development of waste management facilities, or of particular sites or areas, having regard in particular to and ownership constraint which cannot be readily freed, other than through the use of compulsory purchase powers.”

PPS10, Paragraph 18.

8.9 This is picked up in the Companion Guide to PPS10 at paragraphs 2.9 and 2.10. These paragraphs state;

“2.9 The local development framework will provide an overarching spatial strategy and core policies for waste management for the area covered. The core strategy should set out a planning strategy for sustainable waste management that enables sufficient opportunities for the provision of waste management facilities in appropriate locations. The core strategy should be supported by land allocations, sites and areas, for new or enhanced waste management facilities. These allocations should be made in one or more DPD. Detailed policies relating to the delivery of specific allocations should not be included in the core strategy but the core strategy should be clear on how the strategic objectives for the area will be delivered and set out the broad locations for delivering strategic development needs. These will include the pattern of waste management facilities set out in the RSS.

2.10 LDD will not generally prescribe the waste management techniques or technologies that will be used to deal with specific waste streams in the area. Rather, the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area should be identified. Specific allocations will be consistent with the core strategy, and the land opportunities (and constraints) that exist in the area, but should normally avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Exceptions to this are likely to be site allocations to support the pattern of waste management facilities set out in the RSS and in the case of municipal waste, where the MWMS should provide a clear service development strategy requiring sites of a potentially more specific nature.”

8.10 The Plan does not adequately identify land allocations, sites and areas, for new or enhanced waste management facilities that meet the requisite tests of suitability, availability and deliverability. Furthermore, it provides no indication throughout the document of those facilities that might be suitable for location on the areas that have been identified. For these reasons it is not consistent with national guidance.

8.11 Further guidance is provided in PPS12 Local Spatial Planning. It again deals primarily with Core Strategies and the advice contained therein therefore needs to be considered in the context of my comments in paragraph 8.6 above. Paragraph 2.1 identifies the role of local spatial planning and states that it should aim to;

- “produce a vision for the future of places …… within the overall framework of national policy and regional strategies;
- translate this vision into a set of priorities, programmes, policies, and land allocations together with the public sector resources to deliver them;” my emphasis

8.12 The adopted proposal map should therefore;
In relation to providing the requisite degree of flexibility in allocating land, it states at paragraph 4.46:

“A strategy is unlikely to be effective if it cannot deal with changing circumstances….. Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty.”

8.14 The Plan contains no contingency arrangement in the event that (a) the waste transfer stations identified for redevelopment are either not redeveloped or do not deliver the level of capacity that is assumed and (b) that land is not made available and taken up for waste management use within the identified industrial areas. Rather it relies solely upon the review process. This is not consistent with national guidance in PPS12.

8.15 For the above mentioned reasons, the approach to allocating sites within the South London Waste Plan is not considered to be consistent with national policy. Furthermore, the approach adopted will not be effective given the high degree of uncertainty regarding the deliverability of those industrial areas that are identified. For these reasons the Plan is considered to be unsound.

9 Alterations to Metropolitan Open Land (MOL) boundary and Allocation of Site 57 for Waste Management Purposes

9.1 The preceding sections have demonstrated that the figures upon which the allocation of sites and areas is based significantly underestimates the amount of land necessary to manage MSW and commercial and industrial waste arisings within South London. It has further highlighted the high degree of uncertainty regarding the release of sufficient sites to provide the additional capacity required to manage the aforementioned waste. For these reasons the Plan is considered to be unsound.

9.2 The evidence base generated in support of the Plan has considered extensively the existing industrial areas within the four Boroughs. The Plan has, however, been unable to designate specific sites that meet the relevant criteria of suitability, availability and deliverability. The Plan has therefore adopted an approach based upon identification of broad areas within which waste management developments will be permitted, subject to meeting development control criteria, if land should become available within the Plan period.

9.3 In section 7 we demonstrate how similar policies have existed over many years but have failed to deliver the required increase in waste management capacity within South London. Indeed, notwithstanding the pre-existing policies favouring the development of waste management sites within the London Plan and the Borough’s Unitary Development Plans (see Appendix 3), there has been since 2001 a decline in the area of industrial land occupied by such uses as well, an overall decline in the amount of industrial land that exists within South London and an overall
decline in the amount of industrial land and/or buildings that are vacant. The last two of these are largely a product of the high demand for alternative land uses within London i.e. residential and retail uses and the inability of industrial land to compete in terms of land value with such other uses. This holds true for waste management developments.

9.4 Given this position, it is unlikely that the policy approach as set out within the plan is capable of delivering sufficient new sites to meet the requirement arisings within South London.

9.5 In the remainder of this section we outline the changes that are considered necessary to make the Plan sound. This entails a revision to MOL boundaries in the vicinity of Beddington Lane and the specific allocation of Site 57 Land West of Beddington Lane for waste management purposes in accordance with the advice contained within PPS10 and PPS12.

9.6 The land proposed for release from MOL and for allocation for waste management use has been the subject of consultations through earlier versions of the plan\(^6\). It was not excluded through that process on the grounds of its suitability, availability or deliverability. Rather the overall approach of the Plan determined that MOL land releases were not necessary. We have demonstrated through earlier sections of this report that such a conclusion is not sound. The site has also been the subject of sustainability appraisal, a copy of which is attached at Appendix 4 to this report.

9.7 As the requirement cannot be met from within existing industrial estates, then it is necessary to consider the release of Green Belt land or Metropolitan Open Land in order to deliver the additional land requirement with the requisite degree of certainty required in national guidance. This is contemplated within PPS10 where it states as one of its key planning objectives:

"protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission." paragraph 3

9.8 The Companion Guide to PPS10 goes further. It states;

"In certain circumstances, in particular where a local authority’s area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt.

Such a proposal should be brought forward through the LDD process. This will provide greater certainty for the WPA in providing sufficient land capacity to meet identified need for waste management facilities and to the waste industry for the purpose of submitting a planning application. Where land is removed from the Green Belt in this way, it should be specifically allocated in a DPD as a waste management facility site only. This process will need to be carefully coordinated between the District planning authority and the WPA in two tier authority

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\(^6\) South London Waste Plan; Potential Sites and Policies Consultation Document; 20\(^{th}\) July – 16\(^{th}\) October 2009
areas, given that the Green Belt boundary will be defined in the district DPD.” (paragraph 7.34 – 7.35)

In relation to this final comment in this extract, it is clear from the Inspector’s report into the Sutton Core Strategy that the issue of MOL boundary revision occasioned by the needs of waste management development was deferred for consideration in relation to the formulation and adoption of this Plan.

9.9 The Companion Guide to PPS10 provides further support for considering MOL release for waste management purposes within the Core Strategy where it states:

“The core strategy should set out policies & proposals for waste management in line with RSS, ensuring sufficient opportunities for waste management provision in appropriate locations. (7.13 to 7.14)

Land allocations will not be made through the core strategy, but it should provide sufficient spatial guidance so as to ensure there will be sufficient and suitable land allocations to support the waste strategy set out in RSS and its own policies for waste management. (7.15 to 7.17) (My emphasis)”

Of course the current plan is not just a Core Strategy but also performs the role of a site allocations document. It therefore needs to perform the additional role expected of such a document in identifying sites that are suitable, available and deliverable.

9.10 The suitability of Site 57 Land West of Beddington Lane was identified by Mouchel in a report prepared on behalf of the South London Waste Partnership in June 2009 achieving a total score of 86. No other large sites located outside the established industrial areas scored higher. The site was therefore included on the table of sites entitled “Top scoring new sites with opportunity for developing waste management facilities, by borough”. In relation to the site it states;

“Has Potential: Site scores well against suitability criteria. No deliverability constraints and early deliverability opportunities have been identified”

9.11 The potential of the site for release from MOL, subject to a need for further land releases being demonstrated, was also identified by the London Borough of Sutton within its emerging Core Strategy for industrial purposes. Policy PMP4 of the submission draft identified the site for release to accommodate an extension of the Beddington Strategic Industrial Location and at paragraph 5.135 elaborated on the very special circumstances that justified such a release:

“The very special circumstances or the de-designation of land at the Beddington and Kimpton sites include the need to meet identified shortfall for industrial and; the lack of alternative sites to increase industrial capacity elsewhere in the urban area of the Borough; recognition that the provision of additional employment land would consolidate investment in the Borough’s SILs; and, in the case of the land west of Beddington Lane there are no other sites suitable and readily available within the Borough for strategic waste facilities.” (My emphasis)

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7 Mouchel; Preferred Sites Technical Report June 2009; Appendix 5
Relevant extracts from the Sutton Core Strategy Submission Draft are included at Appendix 5.

9.12 Whilst the proposal to release the site from MOL was dropped at the subsequent examination, this occurred not on grounds of the unsuitability of the site for release, but following general concerns expressed by the Inspector that the evidence base to support its release on waste management grounds was not for him to consider in the context of the Core Strategy but was a matter more properly for the emerging Waste DPD to address. Recognising the policy guidance set out in paragraphs 9.7 – 9.9 above, the Inspector concluded;

“In certain circumstances, there may be a case for altering a Green Belt boundary for some types of waste management facilities where no other suitable sites are available outside Green Belts, in particular where a local authority has a high proportion of Green Belt land and an inadequate range of suitable sites exist (PPS10, Companion Guide, paragraphs 7.34-7.35). Since under the LP, Metropolitan Open Land is synonymous with Green Belt, it might be argued that that circumstance might apply in Sutton if no other suitable site is available. ……..Identifying a specific site for waste management in the CS before that DPD has run its course would negate the public consultation process and pre-judge the outcome of the emerging draft DPD. Accordingly, any reference to a specific site for waste management purposes should be removed from the CS.” (Paragraph 3.23)

9.13 The requirement identified by LB Sutton in the emerging Core Strategy and the suitability of the site to meet that requirement remain valid considerations notwithstanding the approach adopted by the Inspector. Furthermore, the specific requirement to release land from MOL for strategic waste management purposes has been highlighted as a decision that should appropriately be taken in the context of this Plan. Sterecycle/Cappagh believes this case to have been proven in the preceding sections of this report given the absence of specific new sites of an appropriate type, scale and location within existing industrial areas.

9.14 Sterecycle/Cappagh are therefore seeking the redrawing of the MOL boundary to exclude land identified as Site 57 Land West of Beddington Lane from MOL and its consequent allocation for waste management use. Specifically, the site is considered suitable for the accommodation of a wide range of waste treatment uses including recycling, materials recovery and energy recovery.

Locational Merits

9.15 In the context of the locational considerations set out within paragraph 21 of PPS10,

(a) The allocation of Site 57 would enable the development of a strategic and sustainable waste management facility as part of an integrated strategy for managing waste in South London. Such a facility would be of a scale that would make it competitive in terms of gate fees and capable of competing favourably with less sustainable waste management options such as landfill, thus contributing significantly towards moving treatment and disposal of waste up the waste hierarchy. The Site is also well located relative to the sources of waste within South London and to the strategic road network and can therefore contribute towards reducing road miles travelled and minimising the environmental and amenity effects of road travel. Lastly, it would make a significant contribution towards meeting the quantitative requirement for facilities to manage MSW and Commercial and
Industrial Wastes within South London, thereby contributing towards self-sufficiency for the sub-region in accordance with national and London-wide objectives. The allocation of Site 57 would therefore have the potential to contribute significantly towards meeting the key planning objectives of PPS10.

(b) The site is well related to the existing industrial areas and is relatively remote in a South London context in particular, from major residential areas, schools or hospitals. The prevailing character of the area is heavily industrial and the surrounding road network already carries a high proportion of heavy goods vehicles. The site has been subject to preliminary assessment work in relation to key environmental areas and no overriding constraints have been identified. This work is included at Appendices 4 – 6. The site is therefore considered suitable in locational and environmental terms to accommodate a strategic waste management use.

(c) In the context of the cumulative effect of waste disposal operations and the consequent potential for this to have detrimental impacts on the environment and amenity, this has to be balanced both by the advantages of co-locating facilities and, in the specific case of the Beddington area, by the fact that it has historically been an area that has supported such uses. The relevance of this last point is that in terms of land use compatibility, surrounding uses have always had regard to the existence of waste management uses in the area, most notably the sewage treatment works and associated sludge management activities. A high degree of compatibility therefore results.

Targeting waste management uses within such an area makes sound land use planning sense, avoiding the spread of such activities into areas that are not currently affected by such uses and that do not have the environmental capacity to accommodate them.

Lastly in relation to cumulative effects, earlier sections of the report highlight the fact that the temporary permissions for the existing waste management activities at the Beddington Farmlands, including the recycling and composting activities, expire in 2016. Whilst a resolution to grant planning permission for an extension was made in 2009, the S106 agreement has never been signed and there are strong indications from the landowner (Thames Water) that it will not enter into the agreement due to unacceptable operational constraints the development would place on their own water treatment works. No weight can therefore be placed upon capacity at Beddington Farmlands beyond 2016. It is likely therefore that the development of Site 57 would act as a replacement for existing capacity at Beddington Farmlands rather than adding cumulatively to the existing capacity within the area.

(d) Lastly, it is not appropriate to consider the use of alternative means of transport given that any facility will be designed primarily to meet requirements arising within South London. Road transport is therefore the only feasible transport option.

A preliminary Transport Assessment has been undertaken in relation to the development of Site 57 and is included at Appendix 7 to this report. The assessment demonstrates that;

- the site access junction performs well within capacity when assessed for the base + full development scenario, even with landfill still operational;
the release of the Beddington Lane site from MOL, and its subsequent development for a strategic waste management facility (including an additional waste processing facility) purposes, would not have a significant impact on Beddington Lane in terms of traffic impact.

The site is therefore considered to be well served by the surrounding road network.

**Wandle Valley Regional Park**

9.16 The Site lies predominantly outside the Wandle Valley Regional Park and does not form part of the area covered by the Conservation Management Plan pertaining thereto. Thus the site would have minimal impact on the achievement of the goals and objectives of the Regional Park, which would continue to be capable of delivery immediately upon completion of the existing waste management operations to the west. That part of the site which does lie within the Regional Valley Park is owned by Cappagh and unlike the main Beddington Farmlands Site to the west does not form part of the S106 Agreement governing its future use. The site will not therefore form part of the Regional Park for management purposes and will not therefore contribute towards the achievement of its objectives.

9.17 The Site adjoins an area of the Regional Park that is designated primarily for nature conservation use as opposed to public access. Public access is concentrated predominantly within the central and western areas of the Site and is therefore relatively remote. From the areas of the park that are publicly accessible, any development would clearly be seen as part of the existing Beddington Lane Industrial Area and would therefore be in keeping with the existing character of the area.

9.18 Far from causing detriment to the Regional Park, the submission version of the LB Sutton Core Strategy identified the potential for the development of this site to contribute towards the future maintenance and management of the Park (paragraph 6.139) and thereby enhance the future role of the facility.

9.19 The potential relationship between Site 57 and the Regional Park is considered further within the Landscape Assessment which is included at Appendix 6 of this report.

**Ecology and Nature Conservation**

9.20 Site 57 is identified as being of nature conservation importance at a metropolitan scale as part of the wider Beddington Farmlands area. It is not, however, considered to be of international or national significance. In light of this a preliminary ecological appraisal has been undertaken setting out the current and potential future interest of the Site and the opportunities that exist for mitigation of any losses resulting from the development of the Site. This is included at Appendix 8 of this report.

9.21 Whilst the wildlife interest of the Site itself would be affected by the development and the direct habitat losses that would occur, the subsequent operation of the facility would not have any significant adverse effect on the wider area. This is important in terms of the achievement of the objectives and long term nature conservation goals of the Regional Park, which lies immediately to the west. As indicated previously, the Site lies predominantly outside the
Regional Park and is not included within the area subject to the conservation management plan.

9.22 It has to be borne in mind also that the primary value of the site for nature conservation stems from the historic sludge spreading and drying operations. With changing practices in sludge management, the Site is no longer actively taking sludge and hence is drying out. The consequence of this is that any ecological value that the site may possess will decline in future years regardless of whether the site is developed or not.

9.23 Far more important in safeguarding the ecological value of the Beddington Farmlands SINC will be the completion and restoration of the waste management operations on the adjoining land. This is currently scheduled for 2016. Notwithstanding this, it is anticipated that significant areas of this site will be returned to nature conservation use in the form of reedbeds, acid grassland and wet grassland within the next couple of years thereby ensuring that the value of the area generally is maintained.

9.24 The ecological appraisal therefore concludes;

“It is unlikely that the Sterecycle Site is of great significance for the wetland species identified given the abundance of similar habitat elsewhere within the Beddington Farmlands site and it is unlikely that the Site will remain of any significance in this respect in the medium term given that sludge management has ceased. In the absence of any other form of management the open wetland character of this site will be lost to invasion by species such as red goosefoot. The compensatory land at Pongo Park will provide mitigation for the species and impacts identified above and therefore the policy requirements identified in Chapter 2 of this report will be fully complied with.” Paragraph 7.3

Potential for Integration with Other Uses/CHP;

9.25 Important also in a policy context is the capability for new facilities to integrate with surrounding uses particularly, in the case of energy recovery, through the development of CHP.

9.26 The Site lies immediately adjacent to the existing Beddington Strategic Industrial Area and more importantly to the Thames Water Sewage Treatment works. A letter from Thames Water highlighting the potential for the use of CHP is included at Appendix 9. Potential to exploit CHP also exists from the Bedzed development to the west. This development already has the necessary infrastructure in place to use waste heat and could therefore be linked to the development of a thermal treatment facility on Site 57.

9.27 As well as the potential to utilise and thereby encourage CHP, the Land West of Beddington Lane also has the potential to attract a range of waste management uses to co-locate. In particular, Site 57 is sufficiently large to offer the potential for green industries that can utilise the recyclate produced by the Sterecycle plant, to locate on adjoining land thereby minimising the need to transport material and maximising the value gained from it. This may include for example industries using recycled plastics to manufacture new products and/or fuel.

9.28 Development and redevelopment opportunities therefore offer a significant opportunity to take full advantage of CHP in the event that such an option forms part of the integrated strategy for the management of the fibre product.
**Conclusion**

9.29 In conclusion the evidence base supporting the Plan does not provide adequate certainty regarding the deliverability of sites within the identified industrial areas. The allocation of sites outside such areas is therefore required. This will require modification to MOL boundaries. Site 57, Land West of Beddington Lane has been identified through earlier versions of this Plan and through the formulation of the Sutton Core Strategy as having the potential for release. The Site accords with the locational criteria in paragraph 21 of PPS10 and has been demonstrated through the sustainability appraisal included at Appendix 4 and the technical reports included at Appendices 6-8, to be suitable for the accommodation of a strategic waste management use. The Site is also available and deliverable.

9.30 Sterecycle/Cappagh are therefore seeking a modification to the boundary of Metropolitan Open Land to exclude Site 57 Land West of Beddington Lane as shown in Figure 9.1 overleaf. In addition, Site 57 should be added to Schedule 2 as follows;

<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>57</td>
<td>Land West of Beddington Lane</td>
<td>Sutton</td>
<td>2011 - 2016</td>
</tr>
</tbody>
</table>

Thus the provisions of Policy WLP 4 would apply.

![Figure 9.1 Proposed Revision to MOL Boundary](image-url)
9.31 In addition, and recognising that the land release from MOL would be specifically for the purposes of waste management use, it is proposed that the site also be safeguarded through a modification to Policy WLP3 or through the addition of a new Policy 3a. Suggested wording is as follows:

Add the following words after the first sentence of in Policy WLP3

“Site 57 Land West of Beddington Farmlands will also be safeguarded for waste management purposes”