Evidence Base Study 3A:
Deliverability of Sites
April 2011
Report of Studies: Deliverability

1. **Background**
   1.1 Government guidance in PPS 10: *Planning for Sustainable Waste Management* requires waste planning authorities to identify in development plan documents sites and areas suitable for new or enhanced waste management facilities for the waste management needs of their areas.

   1.2 PPS10 paragraph 18 advises that waste planning authorities should avoid unrealistic assumptions on the prospects for the development of waste management facilities, or of particular sites or areas, having regard in particular to any ownership constraint which cannot be readily freed, other than through the use of compulsory purchase powers.

   1.3 Furthermore, PPS 12: *Local Spatial Planning* requires development plan documents to be 'sound' and one of the tests for soundness is whether the policies would be 'effective' and therefore deliverable. PPS 12 also advises that local authorities and key stakeholders should undertake timely, effective and conclusive discussions on matters of the deliverability of the options of the Plan.

2. **Methodology**
   2.1 Although PPS3 relates to housing, the deliverability criteria that it specifies, listed below, is also useful and relevant for the consideration of potential waste management sites. To be considered ‘deliverable,’ sites are required to:

   - Be **Suitable** – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities.

   - Be **Available** – the site is available now.

   - Be **Achievable** – there is a reasonable prospect that facilities will be delivered on the site within five years.

**Suitability**

2.2 In assessing sites for their suitability government guidance\(^1\) states that factors such as policy restrictions, physical factors, potential impacts of such development and the environmental conditions that would be experienced by nearby occupiers.

2.3 The South London Waste Plan reviewed the suitability of the sites identified throughout its preparation. If restrictions to a site’s suitability were identified,

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\(^1\) PPS3 (CLG 2010): Housing; Strategic Housing Land Availability Assessments Practice Guidance (CLG 2007)
consideration was given as to whether these could be overcome or whether these would be insurmountable and would therefore prevent the site coming forward for waste management purposes within the lifetime of the plan.

2.4 In 2009 independent environmental consultants, Mouchel, assessed the ‘suitability’ of the initial ‘Long List’ of around 140 sites through site visits and desk studies. The ‘Long List’ included all industrial sites identified within each borough’s Unitary Development Plan, together with other sites suggested to the boroughs during the Waste Plan’s Stage 1 consultation (on ‘Issues and Options’).

2.5 Each site on the ‘Long List’ was objectively scored against a list of criteria in accordance with PPS12 and the Mayor’s London Plan. Details of the scoring criteria can be found in Mouchel’s ‘Potential Sites Technical Report’ (July 2009). These scores were used to inform South London Waste Plan Stage 2 “Potential Sites and Policies”. These two documents – containing the potential sites and the “Long List” - were consulted on for three months between July and October 2009 as Stage 2.

2.6 Following feedback from Stage 2 in November 2009, a more detailed examination of the suitability of the potential sites was undertaken between October 2009 and August 2010.

2.7 These investigations focussed on whether each of the Stage 2 sites were suitable in terms of
- Transport
- environmental health: air, noise pollution etc
- ecology;

2.8 The potential impact of the use of these sites for waste management purposes was also assessed to ascertain whether there would be any harm to the habitats of the three Sites of European Importance that are within or close to south London: Wimbledon Common, Richmond Park and Medway Escarpment. Details of this can be found in the Habitats Directive Assessment for the South London Waste Plan 2010.

General findings from the site suitability assessment

2.9 Details of the findings from the investigations are contained within the specific evidence base reports. These assessments gave rise to the detailed policies contained within the Waste Plan, in particular WP.7: Protecting and enhancing amenity. One of the most significant changes from the previous policy framework is its requirement that waste management facilities should be within a fully enclosed covered building.

2.10 In general no Stage 2 site was ruled out as being entirely unsuitable for waste management purposes, provided that the proposal could meet the terms of the policies in the South London Waste Plan. The impact that compliance will vary from site to site, and depending on which form of waste management was proposed.
Site availability

2.11 Since 2005 research into the availability of industrial land in south London has consistently shown that there is a relatively limited supply, and that industrial land is generally well occupied and commands higher rents compared with other parts of London.

2.12 The Mayor of London carried out London-wide research in 2004 and 2007, which consistently showed that south London boroughs typically have low levels of industrial land relative to demand. Particularly to protect the remaining industrial land for waste management and logistics, the Mayor of London’s industrial capacity SPG (March 2008) encourages south London boroughs - including those in the Waste Plan area - to adopt a more restrictive approach to the transfer of industrial land to other uses.

2.13 Economic and employment land studies for each of the four boroughs undertaken since 2005\(^2\) support this conclusion through more detailed analysis. The conclusions from these reports is consistent with the Mayor’s approach, showing that industrial land and premises in south London are well occupied and command fairly high rents in comparison to other parts of London where there is more industrial space available.

2.14 Following government guidance\(^3\), a site is considered to be available for development when, on the best information available at the time, there is confidence that there is no legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This generally means that the site is owned by one or more organisations that either have an interest in developing it for waste management, or are willing to sell the site.

2.15 Property consultants Kings Sturge were appointed to determine which of the potential sites would be available for the development of modern waste management facilities in the next 5, 10 and 15 years, and the existence of any opportunities for land assembly. A copy of the King Sturge Report is attached as Appendix 1.

2.16 King Sturge carried out an initial observation survey of the potential sites to identify occupiers and inform their site assessment, particularly with regard to the potential for land assembly. They then completed a telephone survey of approximately 55 landowners and 85 occupiers (including owner occupiers).

2.17 Key matters regarding the ‘availability’ of sites were identified as:

\(^2\) Sutton Employment land and premises study (2005); Kingston Employment Land Review (2008); Merton Economic and Employment Land Study (2010)

\(^3\) PPS3 (CLG 2010): Housing; Strategic Housing Land Availability Assessments Practice Guidance (CLG 2007)
– if the site is vacant, what the intentions of the landowner are.
– if the site is occupied, what the intentions of the owner-occupier are or what the intentions and terms of occupation of any leaseholder are.
– whether the site is subject to any restrictive covenants that might prevent a waste management use, and
– whether there are any other conditions limiting its availability for waste management e.g. a number of the potential sites are identified as ‘Strategic Freight Sites’ under the 1993 Railway Act, which generally reserves the land for rail freight use, except in some circumstances in which a lease or sub-lease for a non-rail freight use could be agreed, subject to restrictive clauses.

2.18 With regards to the potential for land assembly, matters that were considered were:

• the number of different landowners,
• the uniformity of lease expiry dates,
• the similarity of uses (e.g. all industrial) with particular regard to other uses with higher value (e.g. retail or office).

General findings from the site availability assessment

2.19 In undertaking the site availability assessment, the same barriers were encountered in the King Sturge report and in the interviews used to assess site achievability (see Section 3 of this report)

2.20 The information provided as to whether the site is “available” is only accurate at a point in time. Other factors, such as the relative health of the operator’s or landlords core business (or that of neighbouring sites), the state of the economy as a whole and uncertainties around the legislative framework all have a strong bearing on the information that the landowners or industry representative provides. A site assessed as unavailable by the landowner or leaseholder may suddenly become available the next month due to a downturn in the landowner or leaseholder’s business meaning that they now want to dispose of it. Both the King Sturge report and the interviews with landowners/industry representatives show that the classification of sites using this methodology is subject to some uncertainty, especially with medium to long-term timescales.

2.21 Commercial confidentiality restricted the amount and accuracy of the information gathered. In both the interviews with landowners / industry representatives and the King Sturge assessment, participants were made aware that their responses would be part of a published report. Understandably, some participants considered their future intentions for investment to be commercially sensitive, and were unwilling to give enough details of their intentions that could meaningfully contribute to the overall assessment of site availability.
2.22 The above issues were not considered to be “show-stoppers”, simply that it should be recognised that site availability is subject to considerable change over a relatively short timescale.

2.23 In their report, King Sturge classified the sites according to their potential availability over the next 5, 10 and 15 years as either ‘good’, ‘possible’ or ‘low’ and according to their potential for land assembly as either ‘none’ or ‘possible’.

2.24 In carrying out this assessment, King Sturge were tasked to consider several of the large industrial areas – such as Willow Lane, Chessington Industrial Area, Factory Lane and Beddington Industrial Area – in its entirety as one “site”. Given that most of these areas are well over 20ha with multiple owners and occupiers present on each, the consideration of these areas as a single unit meant that the King Sturge report assessed these large areas as unavailable, and therefore undeliverable for new waste management purposes.

2.25 However, many of these large industrial areas contain several existing waste management sites, for example on Willow Lane, and Beddington Lane industrial areas. In some cases there was also evidence from the waste management industry that they had identified deliverable sites within the industrial area, either through expansion of an existing waste management facility, conversion of waste transfer to management or by pursuing development on a new site.

2.26 A thorough review of the King Sturge report was therefore undertaken to identify each of the larger industrial areas where whole site availability had been identified as the reason that the site was not considered deliverable during the lifetime of the plan.

2.27 These industrial areas were then analysed to see if there were:

- any existing waste management sites within the industrial area;
- whether any of these sites had stated interest in expansion or intensification of waste management uses to increase throughput;
- whether there was any interest from the waste management industry to develop particular sites within the industrial area (see section on achievability).

2.28 The results of this assessment is summarised in Table 3, which can be found at the end of this document. It shows that, though the King Sturge report assessed many of the larger industrial areas as undeliverable due to problems with whole-site availability during the lifetime of the plan due to multiple owners and occupiers, there was robust evidence that individual sites within the industrial areas would in fact come forward within the plan period.

2.29 This assessment was fed into the deliverability of sites, which is contained in Section 3 of this report.

Site achievability
2.30 According to government guidance, achievability is essentially a judgement about the economic viability of a site, and the capacity of a developer to complete and start operating a site for waste management purposes during the lifetime of the plan.

2.31 The limited amount of industrial land in south London impacts achievability of sites for new waste management facilities, for example by making site assembly less affordable.

2.32 The waste management industry will be the developers of the sites within the South London Waste Plan area. The councils involved no longer develop such facilities directly themselves. It is therefore important to ascertain the interest of the waste management industry in developing facilities within the South London Waste Plan area during the lifetime of the plan. Where waste management developers have shown interest via the planning system in any of the boroughs – either by submitting a planning application for waste management purposes or engaging in pre-application discussions – it is clear that they feel that their site could be made technically suitable for waste management purposes, is available and is economically viable.

2.33 Assessment of waste management’s interest in developing facilities in south London has included:

- Ongoing monitoring of interest in developing waste management facilities in the South London Waste Plan area via the planning applications and pre-application discussions;
- In 2010 officers met with ten landowners and operators who had responded to our consultations. At each meeting questions were posed regarding their intentions with the relevant site(s) and the time frames associated with these intentions. Table 1 below summarises the findings from these meetings but the notes from each meeting are attached as Appendix 2 to this report. It should be noted that any information that was considered to be commercially sensitive, in accordance with Section 43 of the Freedom of Information Act 2000 (as amended), has been excluded from publication;
- where necessary, ongoing contact with industry representatives to confirm intentions and progress on sites.

2.34 The interest of the waste management industry in a particular site is not the only factor in determining whether it is achievable.

2.35 Even though the waste management industry may have indicated that their site is available and that it is technically feasible to build and operate modern waste management facilities there, there may be other restrictions to that particular site coming forward – such as covenants or incompatible planning designations. Incorporating these factors means that such sites have therefore been excluded from Schedule 2 of the submission document.
2.36 Table 1 distinguishes between those sites that operators have indicated could be developed as private (merchant) facilities and those sites that the South London Waste Partnership has indicated would be supported for the development of a residual waste treatment facility.

2.37 The South London Waste Partnership (known as the Partnership) is formed by the four partner boroughs; Croydon, Kingston, Merton and Sutton. It has been established for the purposes of procuring joint waste treatment contracts for the boroughs’ municipal waste.

2.38 Following the successful procurement of contracts to treat the boroughs’ recyclable waste, in May 2009, the Partnership embarked on a two-year procurement process to secure a contract for the treatment of the boroughs’ municipal residual waste. The new treatment facility (or facilities) are due to become operational in 2014/15 and will be able to treat up 200,000 tonnes of residual waste which otherwise would be destined for landfill. The contracts will be for 25 years, with the option for extend for a further 5 years. It is anticipated therefore, that treatment facilities will be operational until 2040, with a possible extension until 2045.

2.39 Although the Partnership has no preference for sites, the partner boroughs have made their existing transfer stations available to bidders within the procurement process, should these be required. Table 1 therefore identifies the boroughs’ transfer stations as potentially deliverable within the timeframe of the Plan. However, given the restrictions imposed by the procurement process, at the time of writing, it is not possible to divulge the details of bidders’ proposals.

Current planning applications for waste facilities

2.40 The potential of sites for which there are undetermined planning applications for waste management facilities has also been considered. In some instances the owners of these sites have not responded to the public consultation process and with others the site did not conform to the initial site assessment criteria, for example measuring less than 0.9ha.

2.41 However, it would be reasonable to assume that these sites have potential for delivery and therefore they have been included for consideration in this report. Table 2 gives details of these sites.

2.42 Table 2 also helps to demonstrate the waste management industry’s interest in specific industrial areas within south London,
Table 1: Summary of feedback from waste operators regarding the likelihood of sites being developed

<table>
<thead>
<tr>
<th>Company</th>
<th>Site reference</th>
<th>Site size (ha)</th>
<th>Borough</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>City and Provincial</td>
<td>1006</td>
<td>3.07ha</td>
<td>Sutton</td>
<td>Proposed gasification facility, with wood as fuel source (sourced from 777 demolition also located in Beddington Lane). Indicated preference for delivering heat and power. The landowners believe that the facility could be delivered within the first 5 years of the plan.</td>
</tr>
<tr>
<td>LRS/Cappagh (Sterecycle)</td>
<td>1007 and part of 57</td>
<td>6.13ha (site 1007 measures 4.03ha; a 2.1ha part of Site 57 is required for this proposal)</td>
<td>Sutton</td>
<td>Proposed gasification facility, with wood as fuel source (sourced from landowner’s construction company and potentially a future neighbouring waste facility to be operated by Sterecycle). Potential for delivering heat and gas to the network. The landowners believe the facility could be delivered within the first 5 years of the plan</td>
</tr>
<tr>
<td>Sterecycle</td>
<td>57</td>
<td>4.6ha (only part of this site is Sterecycle’s site)</td>
<td>Sutton</td>
<td>Proposed MRF &amp; autoclave facility (240ktpa) sourced 50/50 from Municipal and C&amp;I waste. In-principle agreement with Thames Water to supply any heat offtake. The landowners believe the facility could be delivered within the first 5 years of the plan</td>
</tr>
<tr>
<td>Workspace Glebe</td>
<td>60</td>
<td>3.18ha</td>
<td>Merton</td>
<td>2008 proposals for water based Materials Recovery Facility &amp; Anaerobic Digestion facility (100ktpa) for C&amp;I waste are no longer considered viable by the landowner. Alternative whole-site regeneration options are being pursued following Merton's Core</td>
</tr>
<tr>
<td>Company</td>
<td>Site reference</td>
<td>Site size (ha)</td>
<td>Borough</td>
<td>Comment</td>
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<tr>
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</tr>
<tr>
<td>Viridor</td>
<td>18</td>
<td>4.02</td>
<td>Sutton</td>
<td>Sutton’s Planning Authority is currently considering a 2010 application for a 30,000tpa Anaerobic Digestion facility. If approved, this facility could be delivered within the first 5 years of the plan. It should be noted that Sutton has resolved to approve a previous application (2005) for a larger AD facility on this same site but the S106 Agreement has not been signed.</td>
</tr>
<tr>
<td>SITA</td>
<td>126</td>
<td>3.87</td>
<td>Merton</td>
<td>In 2010 Merton Council resolved to refuse an application for the retention of the existing 54ktpa Materials Recovery Facility, a new 40ktpa Waste Transfer Station and a 100,000tpa Anaerobic Digestion and In-Vessel Composting facility with biogas and heat offtake gained. The Reasons for Refusal were restricted to matters regarding the design and size of the proposals and its impact in the adjacent conservation area. The Mayor of London has called in the application. If approved by the Mayor (decision due circa September 2011), or an amended scheme is submitted and approved, the landowners still believe that the facility could be delivered within the first 5 years of the plan.</td>
</tr>
<tr>
<td>SITA</td>
<td>27</td>
<td>0.3</td>
<td>Merton</td>
<td>Merton Council is currently (2011 considering a planning application for an 112,000 tpa Materials Recycling Facility and the operators believe this facility could be delivered within the first 5 years of</td>
</tr>
<tr>
<td>Company</td>
<td>Site reference</td>
<td>Site size (ha)</td>
<td>Borough</td>
<td>Comment</td>
</tr>
<tr>
<td>-------------------------------</td>
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<td>----------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Valad Property Group</td>
<td>491</td>
<td>5.12</td>
<td>Sutton</td>
<td>No current waste proposals, but there is an extant, unimplemented, planning permission for industrial units attached to the land. The owners have put the land forward for consideration for inclusion in the list of sites in the Waste Plan but do not want it to be reserved exclusively for waste usage. At the time of our meeting with Valad, they reported no current interest from waste operators.</td>
</tr>
<tr>
<td><strong>Procurement-related</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South London Waste Partnership</td>
<td>1</td>
<td>1.79</td>
<td>Croydon</td>
<td>This site is owned by Croydon Council and has been offered by the South London Waste Partnership to the bidders of the PFI contract to manage the partner boroughs’ residual municipal waste.</td>
</tr>
<tr>
<td>South London Waste Partnership</td>
<td>9</td>
<td>2.05</td>
<td>Merton</td>
<td>This site is owned by Merton Council and has been offered by the South London Waste Partnership to the bidders of the PFI contract to manage the partner boroughs’ residual municipal waste.</td>
</tr>
<tr>
<td>South London Waste Partnership</td>
<td>6</td>
<td>1.86</td>
<td>Kingston</td>
<td>This site is owned by Croydon Council and has been offered by the South London Waste Partnership to the bidders of the PFI contract to manage the partner boroughs’ residual municipal waste.</td>
</tr>
</tbody>
</table>
**Table 2:** Non-waste management sites with current planning applications for waste management facilities and with whom meetings were not held

<table>
<thead>
<tr>
<th>Company</th>
<th>Site reference</th>
<th>Site size (ha)</th>
<th>Borough</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beddington Heat &amp; Power Ltd</td>
<td>17 part of</td>
<td>0.17ha (part of site)</td>
<td>Sutton</td>
<td>A wood gasification plant handling 30,000tpa is currently being considered on a part of this waste transfer site</td>
</tr>
<tr>
<td>Country Waste Recycling Ltd</td>
<td>17 part of</td>
<td>2.38ha (part of site)</td>
<td>Sutton</td>
<td>2010 retrospective application for the continued use of the site as a waste transfer station and new recycling facilities to handle 150,000tpa is currently being considered</td>
</tr>
<tr>
<td>Rubbish Express Ltd.</td>
<td>Part of 539</td>
<td>0.5ha (approx)</td>
<td>Sutton</td>
<td>2010 application for a 50,000tpa MRF (50% C&amp;I; 50% CD&amp;E)</td>
</tr>
<tr>
<td>Henry Woods Waste Management Ltd</td>
<td>Part of 110</td>
<td>Unknown part of the 0.25ha site</td>
<td>Croydon</td>
<td>2010 application for the continued use of part of the site as a waste transfer station and erection of single storey building for sorting and storage of waste</td>
</tr>
<tr>
<td>Deadman Confidential</td>
<td>Part of 69</td>
<td>0.17ha</td>
<td>Merton</td>
<td>Change of use from commercial vehicle repairs to waste recycling centre and transfer station (MRF 25,000tpa) (resolution to approve August 2010, S10 outstanding)</td>
</tr>
<tr>
<td>G Killoughery Ltd</td>
<td>Part of 69</td>
<td>0.82ha</td>
<td>Merton</td>
<td>Change of use from aggregate recycling facility to waste management facility with buildings to house waste sorting &amp; picking (C, D &amp; E MRF up to 70,000tpa). The installation of a 5 module &quot;waste to energy&quot; plant (up to 45,000tpa) to convert waste via pyrolysis to electricity.</td>
</tr>
</tbody>
</table>
General findings from the site achievability assessment

2.43 As set out in the section above, information on site achievability can only be accurate at a point in time, and such information is often commercially sensitive. An extensive range of factors affect the economic viability of a site to be developed for waste management purposes, from the proposed waste management process, the sources of the waste, the markets for the outputs, local planning rules on renewable energy and factors specific to the site’s location.

2.44 As the range of variables are so great, it would not be considered robust to undertake a range of modelling scenarios to attempt to create an indicator for viability in waste management terms, unlike the approaches regularly used nationwide in assessing affordable housing viability.

2.45 It was clear from interviews with operators in the waste management industry that, in general, larger sites are more sought after than smaller sites. As well as enabling a larger throughput and therefore a more cost-effective scheme, larger sites could allow for several different processes to be carried out on different parts of the site, therefore reducing the need to transport semi-processed waste between different sites. However it is also apparent that waste management industry will consider smaller sites where no larger ones are available.

2.46 From the number of recent developments and active planning applications as set out in Tables 1 and 2, it is also apparent that there is considerable interest from the waste management industry in developing new facilities in the south London Waste Plan area.

2.47 The evidence gathered demonstrates that the larger suitable industrial areas were where deliverable waste management sites are most likely to come forward over the lifetime of the plan.

2.48 In general, the waste management industry representatives did not consider that the industry would be able to assure deliverability of a series of small sites, designated with specific boundaries, due to the risks associated with the viability of such schemes. These risks include the costs involved in getting planning permission, setting up sites and the logistical problems of transporting waste between processes that took place on different sites.

Industrial areas with sites suitable for waste management facilities
2.49 PPS10 advises to “avoid unrealistic assumptions” and with regards to assessing ‘achievability’, PPS3 refer to the “reasonable prospect” of a site being developed for the intended use. With the aforementioned government advice taken into account, this report demonstrates that the only new site that could be delivered within the first 5 years of the lifetime of the Plan would be the 1.6ha portion of Site 1006, the ‘Wandle Road Trading Estate’ in Sutton, which is not within the floodplain.

2.50 The South London Waste Plan Submission document (April 2011) – including Policy and justification WP1: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste - summarises the findings of the technical report and the waste apportionment data. This shows that the South London Waste Plan must find an extra 4.34 hectares of land not already in waste management to strive to meet 100% of the South London Waste Plan area’s waste arisings by 2021.

2.51 Research, including the King Sturge report, discussions with industry representatives and boroughs’ economic and employment land studies, showed that the availability of sites was the most uncertain element of the assessment of site deliverability for the Waste Plan.

2.52 In assessing deliverability from the King Sturge report it became clear that, while many large industrial areas were considered suitable, and had already achieved waste management developments within them (see Tables 1 and 2), they were not available in their entirety for waste management purposes due to issues of multiple ownership/occupancy.

2.53 Even though the amount of new land needed for waste management has been reduced from the initial assessment of 20-25ha (Stage 2), down to 7ha (pre-submission consultation), then to 4.34ha (recommended at submission), from the potential sites consulted on at Stage 2 it is only possible to find a 1.6ha site with good deliverability potential within the lifetime of the plan (the portion of Site 1006, the ‘Wandle Road Trading Estate’ in Sutton, which is not within the floodplain.)

2.54 As set out in the body of this report, the availability of a site can change rapidly with the economic circumstances of the owner/occupier. In addition it was difficult to obtain accurate information that could be published as to the long-term intentions of the landowner / occupier / waste management industry due to commercial confidentiality.

2.55 With the reduction in hectarage of new sites needed, it also became apparent that even the expansion of an existing site by 0.5ha would contribute almost 12% of the new waste management sites needed over
the lifetime of the plan. The significance of existing waste management sites with the potential for expansion, and of waste transfer sites with the potential to be considered for management therefore became more important.

2.56 However it was also observed that, while technological changes were allowing small sites to have more potential for waste management facilities, there were considerable risk factors with delivering such sites viably, due to the proportionate costs in developing each small site and the lack of potential for expansion or co-location of facilities.

2.57 Therefore the assessment of delivery of sites moved to consider whether any of the industrial areas would be more suitable for waste management purposes, without being able to specify particular sites within them. Only industrial areas that were assessed as suitable were considered.

2.58 Even if the whole industrial area had been assessed as being suitable, but with low availability during the lifetime of the plan (often down to issues of multiple ownership), in most cases, based on past trends it was considered likely that individual sites within the industrial area could reasonably come forward for either new waste management uses or via the expansion of existing waste management sites within that area.

2.59 These factors lead to some of the largest industrial areas across the south London Waste Plan area being considered deliverable for waste management purposes over the lifetime of the plan, to meet the Plan’s capacity needs of 4.34 hectares, without designating specific sites within these areas.
3. FINDINGS

The deliverability of the potential sites will be referred to within the following timescales: short term (5 years), medium term (5-10 years) and longer term (10-15 years). The sites are considered in the order they are listed in tables 2.2 to 2.6 inclusive of the Stage 2 Consultation document ('potential sites and policies').

EXISTING WASTE SITES

Site 22: B Nebbett & Son, Ellis Road, Willow Lane Industrial Estate
3.1.1 The site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator

3.1.2 The site is located within Willow Lane Industrial Estate and comprises a warehouse and service yard, recycling 73,000 tpa metal. The site is owner occupied by B Nebbett & Son Ltd who has no plans to dispose of the freehold or lease the site.

Site 100: European Metal Recycling, Beddington Lane, Therapia Way
3.1.3 The site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

3.1.4 This site is owner occupied by European Metal Recycling, recycling 57,000 tpa metal who has no intention to lease or sell the freehold of the site.

Site 2 Fishers Farm HWRC, Croydon, Site 3 Kimpton Road HWRC, Sutton and 4, Purley Oaks HWRC, Croydon
3.1.5 These sites have good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

3.1.6 All of the above Household Waste and Recycling Centres (HWRC) operate as waste management sites, sorting, recycling and composting household waste. The sites have a throughput of between 5,000 and 8,000 tpa.

Site 26 Weir Road HWRC, Merton
3.1.7 As this site was proposed to be closed as a HWRC in Merton Council’s meeting in March 2011, it has low potential for deliverability in the short, medium and longer term by the current owner. It may have potential for delivery by any other waste operator.
Site 1: Factory Lane Transfer Station
3.1.1 The site as a whole has a good potential for deliverability in the short, medium and longer term. It should be noted that this site currently hosts a

3.1.2 This site is owner occupied by the London Borough of Croydon and its uses include household waste and recycling centre (HWRC) and waste transfer. The South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste.

Site 6: Villiers Road Waste Transfer Station
3.1.3 The site as a whole has good potential for deliverability by another waste operator in the short, medium and longer term, subject to the relocation of existing facilities

3.1.4 The site comprises a waste transfer station with the freehold owned by the Royal Borough of Kingston. It is currently occupied by waste occupiers SITA, Environmental Waste Controls (a contractor for the South London Waste Partnership), Veolia and Quadron. All waste contractors are operating on the site under a licence basis and the Royal Borough of Kingston upon Thames is currently negotiating to put leases in place. The South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. Using the site for waste management purposes would involve relocating all current occupiers.

Site 9: Garth Road Civic Amenity Site
3.1.5 The site as a whole has good potential for deliverability by another operator in the short, medium and longer term, subject to the council being able to relocate the existing facilities.

3.1.6 This site is owner occupied by the London Borough of Merton and is used as a waste transfer station and transport depot.

3.1.7 The South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. This site is suitable for waste management and could be made available for inclusion in the South London Waste Plan, although its development would require all or some of the current occupiers to be relocated.
Site 18: Viridor Recycling Centre, Beddington Farmlands
3.1.8 This site only has good potential for deliverability in the short and medium term but low potential in the longer term by the current owner. The site has low potential for delivery by any other waste operator, due to the current occupier’s future intentions and the limited lifespan of the extant planning permission.

3.1.9 Thames Water owns the site’s freehold and Viridor Recycling has long leasehold on the site, managing a throughput of almost 120,000 household and residual waste. This current lease expires in 2019 when the site will be split into two leases with one running until 2031 and the other until 2108. Viridor Recycling has a contract for works until 2023 so will remain in occupation until then. The existing waste facilities only have a temporary planning permission and that the conditions attached to the relevant planning permission require that the land be rehabilitated to form part of the Wandle Valley Regional Park by 2023.

3.1.10 In 2010 London Borough of Sutton received a planning application for a 30ktpa Anaerobic Digestion facility. This replaces a previous application that Sutton had received in 2005 for an AD facility on this site and resolved to approve, subject to S106.

Site 21: 777 Recycling Centre, Beddington Lane, Coomber Way
3.1.11 The site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

3.1.12 This site is owner occupied by 777 Demolition and Haulage Company Ltd who manage household and residual waste on-site; they have no intention to lease or sell the freehold of the site.

Site V: Vertal, Willow Lane, Mitcham
3.1.13 The site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

3.1.14 This site is owned by Vertal, who were granted planning permission in 2009 for in-vessel composting of 75,000tpa

Site 5: Pear Tree Farm Waste Transfer Station, Featherbed Lane, Addington, Croydon
3.1.15 The site has low potential for deliverability in the short, medium and longer term only by the current owner.

3.1.16 The site operates as a household, C&I waste transfer station but is not considered suitable for conversion to waste management or further intensification of the transfer function.

**Site 17: Country Waste Recycling Ltd, Beddington Lane**

3.1.17 The site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator. There is however possible potential for deliverability by another waste operator on the relatively small portion of land for which planning permission is being sought for a gasification plant.

3.1.18 This waste site is owner occupied by Country Waste who has no plans to dispose of the freehold or lease the site. The London Borough of Sutton is currently considering two separate planning applications for waste management facilities on separate parts of this site (refer to Table 2 above).

**Site 25: Sloane Demolition, Amenity Way, Garth Road, Morden**

3.1.19 The site has low potential for deliverability in the short and medium but may have potential for delivery in the longer term.

3.1.20 The site currently operates within the Garth Road industrial area as a waste transfer station for household, commercial and industrial waste.

**Site 27: SITA Transfer, Station, Weir Road, Durnsford Road Industrial Area**

3.1.21 The site has good potential for deliverability in the short, medium and longer term by the current owner.

3.1.22 The owner-operator (SITA) has submitted a planning application for an 112ktpa Materials Recycling Facility on this former waste transfer station site which is currently not operating. Were the proposed facility to be approved, it could be delivered within the first 5 years of the plan. The site was not listed in the Stage 2 consultation document because, at 0.3ha, it is well below the adopted minimum site size threshold of 0.9ha but it was listed in the 'Long List' of sites in the 'Potential Sites' Technical Report 2009.

**Site 96 George Killoughery Ltd, Willow Lane**

3.1.23 The site has good potential for deliverability in the short, medium and longer term by the current owner.
3.1.24 The site is currently in waste use as an aggregates recycling facility and, as set out in Table 2, is seeking planning permission for a waste management facility. It is within Site 69 Willow Lane industrial area and in close proximity to other waste management sites including Site V.

**Site 97: Severnside Waste Paper, Beddington Lane**

3.1.18 There is good potential for deliverability only by the current operator in the short and medium term and the possibility of deliverability by another operator in the longer term if an alternative site is found for the current occupier.

3.1.25 This site is owner occupied by a waste paper plant operator, Severnside, who has no intention to lease or sell the freehold of the site but did expressed some willingness to relocate in the longer term if a suitable alternative site is found.

**Site 126: Benedict Wharf Whole Site**

3.1.26 This site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

3.1.27 This site is owner occupied by SITA who has submitted a planning application for its intensification as a merchant facility, as set out in Table 1. SITA believe that the site will continue for waste management purposes within the lifetime of the plan and has no plans to dispose of the freehold or lease the site.

**Site 86: Days Aggregates**

3.1.28 Although the site holds a waste management licence for aggregates, this Strategic Freight Site has low potential for deliverability in the short, medium and longer term due to the covenants imposed on the lease from Network Rail for Strategic Freight Sites.

3.1.29 The freehold of this site is owned by Network Rail and Days Aggregates holds the lease (refer to note on conditions limiting availability for waste management on Page 7 of the King Sturge report in Appendix 1). Days Aggregates intends to renew its lease but did not rule out the possibility of vacating the site.
3.2 NEW WASTE MANAGEMENT SITES

Site 69: Willow Lane Industrial Estate

3.2.1 Sites within this area have potential for deliverability in the short, medium and longer term.

3.2.2 This site comprises 41.45ha of multiple ownership industrial estates. The estate is a mix of owner occupiers and leaseholds with the London Borough of Merton owning three areas, namely: 52-58 Willow Lane; land on either side of Ossier Way; and an area of land between Wandle Way and Ossier Way, which it leases to occupiers on long ground leases. As with site 641 and site 642, the Council undertook a review of this site as part of a wider property audit, and its key objective is to retain and improve the income stream available from the site. This strategy does not rule out a waste use on part of the site.

3.2.3 There is considerable interest from the waste management industry in the wider area; as set out in Table 3 below the area contains three separate waste management sites amounting to approximately 2ha. This area is also in close proximity to the existing waste management sites found within Area 532/533/534/535/539/5312 Beddington Industrial Area – part of (Sutton), and Site 1006: Wandle Valley Trading Estate.

Site 99: Purley Oaks Highway Depot

3.2.4 This site has possible potential for deliverability in the short, medium and longer term, subject to the London Borough of Croydon's Highways Section being relocated.

3.2.5 The site is owned by London Borough of Croydon and is currently used by the Council’s Highways Section. Croydon Council is currently considering a planning application to expand the layout of the adjacent HWRC onto this site. Due to the location of a pond at the western boundary, only a 1ha portion of the site could be developed.
Site 102: Purley Way, Lysander Road and Imperial Way Industrial Area

3.2.6 The site has low potential for deliverability in the short and medium and possible potential for deliverability in the longer term.

3.2.7 This site has multiple ownership and multiple occupiers; at 24.69ha the size of the site and range of occupiers make it likely that sites will become available during the lifetime of the plan.

Site 105: Factory Lane Industrial Estate

3.2.8 There is potential for delivery of waste management facilities in the medium and long term within this 7.02ha designated industrial area as vacancies come forward from some of the multiple owners / tenants. There are existing safeguarded sites in close proximity: Site 1 (Factory Lane Transfer Station) lies to the south.

Site 125: Croydon Factory Lane industrial estate (South Side)

3.2.9 The site has low potential for deliverability for waste management in the short and medium term, but possible potential in the longer term, on expiry of Tesco’s lease.

3.2.10 The site is adjacent to Site 1 (Factory Lane Transfer Station). Oyster Jersey Property Fund owns the freehold of this site and the current tenant, Tesco, has 10 years remaining on its current lease. Tesco has confirmed their intention of retaining the lease for this period but provided no information regarding their intentions thereafter.

Site 351/352/353: Chessington Industrial Area, Kingston

3.2.11 There is potential for delivery of waste management facilities in the long term within this large (34.91ha) designated industrial area as vacancies come forward from some of the multiple owners / tenants.
Site 491: Kimpton Industrial Estate, Land North of Minden Road

3.2.12 Due to the extant planning permission and the landowner’s resistance to the reservation of the land for waste purposes, this 5.12ha site has possible potential for deliverability for waste management in the short, medium and longer term.

3.2.13 The site includes the Kimpton Trade and Business Centre, which is owned by the Industrial Property Investment Fund who intends to maintain ownership of this estate. Valad holds a 250-year lease from the London Borough of Sutton on the open north-eastern part of the site that measures approximately 2.3ha.

3.2.14 There are no waste proposals for the site but there is an extant, unimplemented, planning permission for industrial units attached to the vacant land. Valad have put the land forward for consideration for inclusion in the list of sites in the Waste Plan but do not want it to be reserved exclusively for waste usage.

Site 641/642: Durnsford Road Industrial Area

3.2.15 There is potential for delivery of waste management facilities in the medium and long term from sites within this XXha designated industrial area as vacancies come forward during the lifetime of the plan.

3.2.16 The London Borough of Merton owns the freehold for most of this area, with multiple tenants occupying sites within it. The Council has recently reviewed the potential of this site and its key objective is to retain and improve the income stream available from the site; the adopted strategy does not rule out a waste use. There is waste management industry interest in the area: site 27 (SITA transfer station, Weir Road) lies within this designated industrial area to the eastern side.

Site 651: Plough Lane Industrial Area

3.2.17 Sites within this area have low potential for deliverability in the short, medium and longer term.

3.2.18 This area has multiple ownership and multiple occupiers who have expressed no intention to vacate the site or to sell the freehold at the current time. There is no recorded interest from the waste management industry in this area; the nearest waste management site is site 27(SITA transfer station which lies within Sites 641/642 to the north.

3.2.19 The boroughs acknowledge that this site should not have been included after the Stage 2 (the Preferred Sites and Policies) consultation ~(July-October
2009) since the proximity of residential properties to the site had not been taken into account and this combined with other low scores made it unlikely to have sites suitable for waste management.

**Area 702: Garth Road Industrial Area**
3.2.20 This 5.6ha designated industrial area has low potential for deliverability in the short and medium term with possible potential for deliverability in the longer term.

3.2.21 This area consists of numerous small sites and has multiple ownership and multiple occupiers. The area is adjacent to Site 9: Garth Road HWRC which, via the South London Waste Partnership, shows that there is the waste management industry in the wider area.

**Area 1006: Wandle Road Trading Estate**
3.2.22 Although there are some concerns regarding flooding and the 'suitability' of the site, the Wandle Technology Park portion of the site has good potential for deliverability in the short, medium and longer term.

3.2.23 City and Provincial own the freehold of this 3ha industrial estate, which includes the Wandle Technology Park, the Wandle Trading Estate and the land between Mill Green Road and Wood Street. This site was listed in the Stage2A consultation document due to the positive response received from the owners who are keen to erect an Energy-from-Waste plant on the Wandle Technology Park part of the site. The Wandle Technology Park comprises approximately 1.6ha of land and all the occupiers are on short-term leases that expire within 12 months.

**Area 5312/532/533/534/535/539: Beddington Industrial Area**
3.2.24 Sites within this area have good potential for deliverability in the short, medium and longer term.

3.2.25 As set out in Table 3 below, there is considerable interest from the waste management industry in this 40.38ha designated industrial area; the Beddington area contains six separate sites amounting to approx 4ha of waste uses as well as current planning applications set out in Table 2. This area is also in close proximity to the existing waste management sites found within Site 69: Willow Lane, and Site 1006: Wandle Valley Trading Estate.
Site 47: Land at Kingston Road/Jubilee Way junction, Tolworth
3.2.26 The site has low potential for deliverability in the short, medium and long term.

3.2.27 The Royal Borough of Kingston upon Thames owns this 1.72ha site of open land. The Council’s Youth Service and a private motorcycle training company, who has to renew its licence annually, currently occupy the site jointly. The Royal Borough of Kingston upon Thames has however indicated that they do not wish to develop this site for waste management purposes as this land is designated in their adopted UDP and Draft Core Strategy for ‘Recreation & Leisure’ uses.

Site 46: Leatherhead Road, Chessington, Coal Depot adjacent to Barwell Business Park
3.2.28 This site has low potential for deliverability in the short, medium and longer term due to the covenants imposed on the lease from Network Rail for Strategic Freight Sites.

3.2.29 Network Rail owns the freehold of this site and CPL Distribution has a lease on this Strategic Freight Site. Lease renewal discussions are currently under way and Network Rail intends to renew with CPL Distribution for a further 12-15 years. It is CPL Distribution’s intention to remain on site for the short, medium and long term.

Site 136: Deer Park Road
3.2.30 The site has low potential for deliverability in the short, medium and longer term.

3.2.31 This site has multiple ownership and multiple occupiers who have expressed no intention to vacate the site or to sell the freehold. There is no recorded interest from the waste management industry for this area, or sites within it.

Site 60: Rainbow Park Industrial Estate
3.2.32 The site has low potential for deliverability in the short, medium and longer term.

3.2.33 This site has multiple occupiers but the freeholder, Workspace Group, has confirmed that vacant possession of the site could be achieved within five years. Workspace also owns the freehold to the property at the entrance to the estate, which could be altered to improve access to the site.
3.2.34 2008 proposals by for water based Materials Recovery Facility & Anaerobic Digestion facility (100ktpa) for C&I waste are no longer considered viable by the current landowner. Alternative whole-site regeneration options are being pursued following Merton's Core Planning Strategy examination in February 2011.

**Site 127: Willow Lane Area by Wandle River**

3.2.35 This site can be found within the area Site 69: Willow Lane Industrial Area. Due to the lease expiry in 2018 and the existence of waste operations at the neighbouring sites, this site is considered to have possible potential in the medium and longer term.

3.2.36 The site consists of three parts: the site at the north-western end, 43 Willow Lane (0.87ha), which has recently been developed as a waste treatment facility managed by Vertal (73,000tpa in-vessel composting, the site at the south-eastern end, 35-37 Willow Lane (0.37ha), which has recently gained planning permission for a waste transfer use to be managed by B Nebbett & Son Ltd and the middle site, 39 Willow Lane (0.46ha), which is owned by City and Provincial Properties Plc and who leases it to 8 tenants with all leases expiring in 2018.

**Site 57: Land west of Beddington Lane adjacent to industrial areas and existing waste management facilities**

3.2.37 This site is considered to have low potential for deliverability in the short, medium and longer term.

3.2.38 This site comprises 6.76 ha and is owner occupied in two parts. Waste operator, Sterecycle owner occupy the northern half of the site and waste operator Cappagh owner occupy the southern part of the site via a subsidiary of Cappagh called Ferncombe Properties. Both owners have expressed an urgent desire to develop this site for waste management purposes.

3.2.39 The 'Site Report for 57' in Appendix 4 of the July 2009 Potential Sites Technical Report by Mouchel, which informed the potential sites listed in the Stage 2 Potential Sites and Policies Consultation Report, states that: “This site has been treated as de-designated Metropolitan Open Land in accordance with Sutton’s Core Strategy”. The same Mouchel report states in para 2.5.3 that: “The suggestion of investigating the land west of Beddington Lane is also being pursued through Sutton’s Core Strategy, together with other open land sites in the area west of Beddington Lane. At the time of writing, we are awaiting the Inspector’s Report following the examination in public of Sutton’s Core Strategy. Conclusions from this report will inform the ongoing development of the South London Waste Plan.”
3.2.40 The Inspector’s report on the Examination in Public of the Sutton Core Strategy was published on 4 September 2009. That report deferred the discussion about the removal of Site 57 from MOL to be considered within the South London Waste Plan.

3.2.41 The GLA’s response to this site received during the Stage 2 consultation has highlighted its designation as Metropolitan Open Land and a Site of Metropolitan Importance for Nature Conservation. These policy designations are strongly supported by the Mayor of London and for these reasons, the GLA does not support the inclusion of this site within the Waste Plan. Furthermore, at a meeting with the GLA held in June 2010, the GLA confirmed that the need for larger sites does not outweigh the protection of MOL and would not be considered an argument to justify the very special circumstances required to develop MOL. Were this site to be regarded as ‘suitable’, the site would be ‘available’ and a waste management facility would be ‘achievable’ but as this site is within designated MOL land it is no longer considered to be ‘suitable’ for a waste management facility.

**Site 104: Purley Way, Lombard Business Park**
3.2.42 The site has **low** potential for deliverability in the **short**, **medium** and **longer** term.

3.2.43 This site is owned by Workspace Group and has multiple occupiers with varying lease lengths. Workspace Group has expressed no intention to sell the freehold. There is no recorded interest from the waste management industry in this area at this time

**Site 124: Former Government Offices, Hook Rise South, adjoining sites fronting Kingston Road and Tolworth Station, Tolworth.**
3.2.44 The site has **low** potential for deliverability in the **short**, **medium** and **longer** term, due to the current owner’s future intentions.

3.2.45 This freehold for this vacant site is owned by Tesco who intends to develop the site as a retail store with a high residential component.

**Site 41: Kingston Road, Tolworth Aggregates Depot south of railway.**
3.2.46 This site has **low** potential for deliverability in the **short**, **medium** and **longer** term, due to the current lease length, the intentions of the occupier and the covenants imposed on the lease from Network Rail for Strategic Freight Sites.
3.2.47 The freehold of this site is owned by Network Rail and Days Aggregates has a lease on this Strategic Freight Site till 2027 (refer to note on conditions limiting availability for waste management in the King Sturge report in Appendix 1). Days Aggregates has no intention of vacating the site prior to the lease expiry.

**Site 45: Leatherhead Road, Chessington, Barwell Business Park**

3.2.48 The site has *low* potential for deliverability in the *short, medium* and *longer* term.

3.2.49 This site is owned by Aviva and has multiple occupiers with varying lease lengths. Aviva have expressed no intention to sell the freehold. There is no recorded interest from the waste management industry in this area at this time.

**Site 36: Leatherhead Road, Malden Rushett, Silverglade Business Park**

3.2.50 The site has *low* potential for deliverability in the *short, medium* and *longer* term.

3.2.51 This site is owned by Hampshire County Council Pension Fund and has multiple occupiers with varying lease lengths. The Hampshire County Council Pension Fund has expressed no intention to sell the freehold. There is no recorded interest from the waste management industry in this area at this time.

**Site 33: Red Lion Road, Tolworth**

3.2.52 The site has *low* potential for deliverability in the *short, medium* and *longer* term.

3.2.53 This site has multiple ownership and multiple occupiers who have expressed no intention to vacate the site or to sell the freehold. There is no recorded interest from the waste management industry in this area at this time.

**Site 751: Burlington Road west side junction with A3**

3.2.54 The site has *low* potential for deliverability in the *short, medium* and *longer* term.

3.2.55 This site has multiple ownership and multiple occupiers, with some being retailers, who have expressed no intention to vacate the site or to sell the freehold. There is no recorded interest from the waste management industry in this area at this time.
Site 73: Bushey Road Industrial Area
3.2.56 The site has low potential for deliverability in the short, medium and longer term.

3.2.57 This site has multiple ownership and multiple occupiers, with some being retailers, who have expressed no intention to vacate the site or to sell the freehold. There is no recorded interest from the waste management industry in this area at this time

Site 61: Dundonald Road Industrial Estate
3.2.58 This site has low potential for deliverability in the short, medium and longer term, due to the current lease length, the intentions of the occupier and the covenants imposed on the lease from Network Rail for Strategic Freight Sites.

3.2.59 The freehold of this site is owned by Network Rail and Colas has a lease on this Strategic Freight Site till 2044 (refer to note on conditions limiting availability for waste management in the King Sturge report in Appendix 1). Colas has no intention of vacating the site prior to the lease expiry.

Site 492: Kimpton Industrial Estate, Land East of Kimpton Road
3.2.60 The site has low potential for deliverability in the short, medium and longer term.

3.2.61 This site has multiple ownership and multiple occupiers who have expressed no intention to vacate the site or to sell the freehold. There is no recorded interest from the waste management industry in this area at this time.
**Table 3: assessment of site availability within industrial areas**

<table>
<thead>
<tr>
<th>Site ref</th>
<th>Site Description</th>
<th>Borough</th>
<th>Total size of area</th>
<th>Reason given for whole site deliverability constraints</th>
<th>Interest from the waste management industry within the area?</th>
<th>Contains or adjacent to sites in Schedule 1 (protected by WP.3)</th>
<th>Likely timescale for development of the site</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>Willow Lane Industrial Area</td>
<td>Merton</td>
<td>41.45</td>
<td>Multiple ownership, multiple occupiers</td>
<td>Yes, contains 3 separate sites amounting to c2ha of waste management</td>
<td>Contains the following existing sites: Site 22: good potential throughout plan period; Site V 43 Willow Lane (0.87ha) is existing Vertal waste treatment; 35-37 Willow Lane (0.37ha) ex B Nebbets existing waste site;</td>
<td>2017-21</td>
</tr>
<tr>
<td>99</td>
<td>Croydon Purley Oaks Highway depot</td>
<td>Croydon</td>
<td>1.06</td>
<td>Possible throughout plan period</td>
<td>Yes adjacent to HWRC</td>
<td>Site 4 Purley Oaks HRWC</td>
<td>2017-21</td>
</tr>
<tr>
<td>102</td>
<td>Purley Way, Lysander Road and Imperial Way Industrial Area</td>
<td>Croydon</td>
<td>24.69</td>
<td>Multiple ownership, multiple occupiers</td>
<td>No current interest</td>
<td></td>
<td>2017-21</td>
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<tr>
<td>105</td>
<td>Factory Lane Industrial Estate</td>
<td>Croydon</td>
<td>7.02</td>
<td>Multiple ownership, multiple occupiers</td>
<td>Yes, adjacent to Factory Lane Transfer Station</td>
<td>Site 1 Factory Lane Transfer Station, assessed as coming forward within first five years of the plan</td>
<td>2017-21</td>
</tr>
<tr>
<td>125</td>
<td>Croydon</td>
<td>Croydon</td>
<td>3.11</td>
<td>Low short</td>
<td>Yes, adjacent to Site 1 Factory Lane</td>
<td></td>
<td>2017-21</td>
</tr>
<tr>
<td>Site ref</td>
<td>Site Description</td>
<td>Borough</td>
<td>Total size of area</td>
<td>Reason given for whole site deliverability constraints</td>
<td>Interest from the waste management industry within the area?</td>
<td>Contains or adjacent to sites in Schedule 1 (protected by WP.3)</td>
<td>Likely timescale for development of the site</td>
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<tr>
<td>351 / 352 / 353</td>
<td>Chessington Industrial Area</td>
<td>Kingston</td>
<td>34.91</td>
<td>Multiple ownership, multiple occupiers</td>
<td>No current interest</td>
<td>Factory Lane Transfer Station, assessed as being delivered within first five years of the plan</td>
<td>2017-21</td>
</tr>
<tr>
<td>491</td>
<td>Kimpton Industrial Estate, land north of Minton Road</td>
<td>Sutton</td>
<td>5.12</td>
<td>Multiple ownership, multiple occupiers</td>
<td>Yes, contains 2.3ha site owned by Valad, possible potential over lifetime of plan</td>
<td></td>
<td>2017-21</td>
</tr>
<tr>
<td>531 2/53 2/53 3/5 34/5 35/539</td>
<td>Beddington Industrial Area</td>
<td>Sutton</td>
<td>40.38</td>
<td>Multiple ownership, multiple occupiers</td>
<td>Yes, contains 6 separate sites amounting to c4ha of waste transfer or management</td>
<td>Sites 17, 21, 100 all assessed as having good deliverability potential throughout plan period; Site 97 good short medium, possible long term; Site 18 good short medium, low short term</td>
<td>2017-21</td>
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<tr>
<td>Site ref</td>
<td>Site Description</td>
<td>Borough</td>
<td>Total size of area</td>
<td>Reason given for whole site deliverability constraints</td>
<td>Interest from the waste management industry within the area?</td>
<td>Contains or adjacent to sites in Schedule 1 (protected by WP.3)</td>
<td>Likely timescale for development of the site</td>
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<tr>
<td>641 / 642</td>
<td>Durnsford Road Industrial Area</td>
<td>Merton</td>
<td>16.17</td>
<td>Area east of weir road (site 641) has possible potential throughout plan period; Plough Lane</td>
<td>Yes, contains 1 site amounting to 0.3ha of proposed waste management use</td>
<td>Owned by Sterecycle and Cappagh – interest from waste industry but MOL designation lead to low deliverability potential. Site 534 (comprising sites 97 and 21) mostly owned by existing operators 777 and Severnside</td>
<td>2017-21</td>
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<td>702</td>
<td>Garth Road Industrial Area</td>
<td>Merton</td>
<td>5.6</td>
<td>Multiple ownership, multiple occupiers</td>
<td>Yes, adjacent to Garth Road civic amenity site</td>
<td>Site 27 SITA Weir Road (0.3ha) good deliverability throughout plan period.</td>
<td>2017-21</td>
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<td>100</td>
<td>The Wandle Valley Trading</td>
<td>Sutton</td>
<td>1.6</td>
<td>Concerns over suitability</td>
<td>Yes, see Table 2 of the</td>
<td>Owned by City and Provincial who support</td>
<td>2011-16</td>
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<tr>
<td>Site ref</td>
<td>Site Description</td>
<td>Borough</td>
<td>Total size of area</td>
<td>Reason given for whole site deliverability constraints</td>
<td>Interest from the waste management industry within the area?</td>
<td>Contains or adjacent to sites in Schedule 1 (protected by WP.3)</td>
<td>Likely timescale for development of the site</td>
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Appendix 1: Final Draft of the King Sturge Report.
APPENDIX 1

REPORT BY KING STURGE – LAND AVAILABILITY STUDY FOR THE SOUTH LONDON WASTE PLAN

OCTOBER 2010
LAND AVAILABILITY STUDY FOR SOUTH LONDON WASTE PLAN

AS AT

25 OCTOBER 2010

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INTRODUCTION

This report was commissioned by the Royal Borough of Kingston upon Thames in May 2010 to assist a partnership of four south London boroughs (Croydon, Kingston, Merton and Sutton) prepare a Joint Waste Development Plan Document, known as the South London Waste Plan. The Waste Plan will form part of each borough’s Local Development Framework (LDF) and will provide a planning framework for the management of all waste produced in the partner boroughs.

Prior to commissioning this study, the councils had identified a number of sites as being potentially suitable, from a planning perspective, for the development of waste management facilities.

- Initially broad ‘areas of search’ for sites were defined as existing waste sites and industrial areas identified in the boroughs’ Unitary Development Plans (UDPs).
- Subsequently a long list of sites was identified and assessed against a range of criteria including proximity to residents, proximity to nature conservation areas, the flood risk of a site, and the potential impact on traffic on the local road network.
- A shorter list of ‘potential sites’ was then consulted on between 20th July and 16th October 2009 in the Stage 2 Consultation.

The principal purpose of this study, is to ascertain whether, and when, the identified sites that were subject to public consultation in stage 2 (see sites listed in Table 2.2 to Table 2.6 inclusive of that document) might be available for development. More specifically, according to the Brief, the two main aims of this study are:

1) To understand the likelihood of each site becoming available for the development of modern waste management facilities in the next 5, 10 and 15 years;
2) To understand whether there are any opportunities for land assembly, to provide larger sites.

The latter is important because in allocating sites and areas, national policy guidance\(^1\) underlines the importance of avoiding unrealistic assumptions on their prospects for development for waste management facilities. Local Planning Authorities are required to have regard to any ownership constraints which cannot be readily freed because of the concern that sites may not in reality come forward for waste management without willing land owners, or the use by the WPA of compulsory purchase powers.

A number of the sites considered within this report are existing waste sites and as such, are protected for their continued use under policies within the Mayor’s London Plan (Policy 4A.22: Spatial policies for waste management). However, it is important to include these sites within the scope of this study to ascertain the likelihood of these sites being freed for development by other waste operators.

Following this introduction:-

- Section 2 provides an overview of our methodology for undertaking this study.
- Section 3 provides a background overview of the general factors affecting the likelihood of sites becoming available for waste management facilities and the potential for land assembly. This section provides contextual background for our assessment of specific sites.
- Section 4 provides a summary of our assessment for each site. Appendix 1 presents our assessment in a tabular form with details of the occupiers and landowners we contacted.
- Section 5 provides some conclusions in terms of key sites that could be available for waste management development over the next five to fifteen years.

2 METHODOLOGY

The primary research method envisaged by the Brief was to identify and make contact with occupiers. This is an important part of any approach because understanding an occupier’s terms of occupation and its future intentions is an essential part to understanding whether a site might become available and, if so, in what time frame. If an occupier owns the freehold of its premises or land, then ascertaining this information would be sufficient to understand whether a site would become available. However, where an occupier leases its premises or land then it is also important to understand the intentions of the freehold landowner. As a result, the research method for this study comprised:

- a drive-around observation survey of the sites under review. This was undertaken at the start of the project to identify occupiers and to provide insight to inform our site assessment, particularly the potential for land assembly.

- a survey of occupiers. It was not possible within the study's timescale to contact all occupiers. Therefore, we concentrated on making contact with larger occupiers since the purpose is to identify available sites of 0.9 ha (9,000 m²) and above.² This size threshold reflects guidance in the Mayor’s London Plan which identified the smallest typical landtake from a waste management facility as just under 1 hectare, and the view of the south London Waste partnership boroughs that sites smaller than this are unlikely to contribute to their strategic waste needs.

- a survey of landowners. Again, it was not possible to contact all landowners so we focused on the most significant ownerships. Some of the sites are in single ownership but many are in multiple ownership. Information on ownerships was acquired via in-house market intelligence from King Sturge and from the partnership councils. For two sites, information was sought from the Land Registry.

² Assuming a site density of 50%, this is equivalent to an occupier occupying a built unit of 4,500 m².
In total we surveyed approximately 55 landowners and 85 occupiers (including owner occupiers). It should be noted that our survey was conducted over the telephone, and the information we secured was almost wholly provided verbally. As a result, we have had to rely on this third party information and we have not had an opportunity to inspect any leases or freehold title documents. It is also the case that many occupiers did not know the exact length of their leases or whether they had a break clause, or would not tell us these details. Finally, whilst occupiers and landowners were usually prepared to provide a general indication of their current future intentions these could clearly change, and in some cases, occupiers or landowners said they ‘did not know’ when asked this question. As a result, our classification of sites is subject to some uncertainty, particularly in terms of timescale.

Whilst we surveyed a significant proportion of landowners and occupiers within the sites under review, in some cases, particularly in the larger multi-occupied and multi-owned sites, we still did not contact a number of occupiers and owners. We have, therefore, given our best assessment of the sites as a whole, although we may not have identified every opportunity for land availability or land assembly within them. In addition, following guidance from the Royal Borough of Kingston, we did not specifically refer to the South London Waste Plan when contacting land owners and occupiers, and it is possible that had we mentioned this Plan we may have received different responses from some respondents.

Finally, for clarification, the focus of our study is on assessing the availability of land for inclusion in the South London Waste Plan. Where we have identified existing waste sites as being potentially available for inclusion in the South London Waste Plan, this refers to their deliverability with the current waste occupiers on site, if that waste operator does not intend to vacate the site or if the freeholder does not intend to sell the site. The deliverability of these sites would then subsequently be affected by the chosen waste contractor for the Plan.
3 GENERAL FACTORS AFFECTING THE AVAILABILITY OF LAND FOR WASTE MANAGEMENT DEVELOPMENT AND THE POTENTIAL FOR LAND ASSEMBLY

As noted in Section 1, the sites that are assessed in this study have already been identified as being suitable for waste management facilities from a planning perspective, and as meeting a range of other suitability criteria, and, therefore, we have not considered these issues in this study. However, to assess a site's potential availability requires consideration of a range of other factors.

IS THE SITE CURRENTLY VACANT OR OCCUPIED?

If the site is currently vacant, then the key initial issue is the intention of the landowner. If the landowner intends to re-let the site to a non-waste occupier or redevelop the site for a use other than waste management then this will represent a significant barrier to the land becoming available for waste management purposes.

If the site is occupied, then the potential availability of the site for waste management development will depend on the occupier’s terms of occupation and its future intentions. In addition, if the occupier has a leasehold rather than freehold interest, the intentions of the freehold landowner must be established.

Clearly different occupiers have different property rights depending on the type of interest they have. If the occupier has a freehold interest then it has a perpetual right to hold the property and a right to transfer the freehold title to another party.

If the occupier has a leasehold interest then it has a right to hold or use the property for a fixed period of time at a given price (i.e. rent) as set out by the terms of its lease contract. Depending on the type of lease it has signed, an occupier may have a degree of ‘security of tenure’, whereby it has a right to seek a renewal of its tenure at the end of lease, although the landowner can refuse to grant a new tenancy for a number of reasons.
LAND AVAILABILITY STUDY FOR SOUTH LONDON WASTE PLAN

One reason it can do this, is if a landlord does not want to renew a protected tenancy because it intends to redevelop the site (in which case it must prove that it is going to redevelop). In this case it has to pay compensation to the tenant. If the tenant has been in occupancy for less than 14 years, the landlord has to pay one times the rateable value as compensation. If the tenant has been in occupation for more than 14 years, the landlord has to pay two times the rateable value as compensation.

Security of tenure applies to leases signed within the Landlord and Tenant Act 1954 whilst leases ‘outside the Act’ do not provide security of tenure.

Some occupiers may have a long leasehold interest, perhaps extending for 99 or 125 years or longer, whilst other leasehold interests are shorter, e.g. 10 or 15 years. Some leases may also have ‘break clauses’ which may be exercised mutually (i.e. by the tenant or landlord) or solely by the tenant or the landlord. Clearly, where a break clause exists a property may become available before the lease expiry date.

Occupiers who have a leasehold interest can usually transfer that interest to another party either by an assignment of the whole lease or by a granting a sub-lease to another party for the whole or part of the property.

Therefore, the likelihood of an occupied property becoming available for waste management development depends on a range of factors including the occupier’s and landowner’s intentions and the precise nature of any leasehold interests.

For background, as a general trend, lease lengths have been getting shorter over time, a trend that is likely to have continued in the recent recession. For example, research published by the British Property Federation and Investment Property Databank (IPD) found that in 2008 the average length of lease in the UK (office, retail and industrial leases weighted by rent passing) was 11.0 years compared with 16.1 years in 1999.\(^3\) If breaks were taken into account, the average lease length fell to 9.7 years, compared with 14.3 years in 1999. If short leases under 4 years, or licences, were excluded, the average lease length increased slightly to 11.1 years compared
with 15.3 years in 1999. The same research found that the proportion of leases with break clauses increased to 28.2% in 2008/09 compared with 22.7% in the previous year.

Separate research by Strutt & Parker and IPD shows that in 2008 the proportion of leases renewed at the end of the original tenure was 33% (weighted by rental value) up from 17% in 2007, whilst the propensity to exercise a break clause fell to 24% compared with 47% in 2007.\(^4\)

**IS THE SITE SUBJECT TO ANY RESTRICTIVE COVENANTS THAT MIGHT PREVENT A WASTE MANAGEMENT USE?**

Whether vacant or occupied, a site may be subject to a restrictive covenant (or covenants) that imposes duties or restrictions on the use of the land irrespective of the landowner. A restrictive covenant ‘runs with the land’ and is registered against the title such that a new owner would have to take the land with the restrictive covenant (s) in place.

**OTHER CONDITIONS LIMITING AVAILABILITY FOR WASTE MANAGEMENT**

In addition to restrictive covenants, certain sites may be identified for particular uses. For example, a number of the sites under review are identified as ‘Strategic Freight Sites’ (SFS) under the 1993 Railway Act, which secured the privatisation of British Rail’s freight business. Strategic Freight Sites are currently managed by Network Rail and are generally reserved for rail freight use, although we understand from Network Rail that it may be possible for a site to be leased or sub-leased for a non-rail freight use, although this would require the permission of both DB Schenker and Freightliner. The lease or sub lease would have to be subject to a rolling 6 month break clause as the freight operators can ask for the site back at any time and Network Rail has to give them vacant possession with a 125 year lease.

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3 BPF IPD Annual Lease Review 2009
4 The Strutt & Parker IPD Lease Events Review 2009
Therefore, there are a range of barriers that need to be overcome before a site can be considered available for waste management, even where it is suitable from a planning perspective. Sites which are in multiple ownership and multiple occupation typically present a range of more formidable barriers compared with sites that are in single ownership and occupation and, even where a site is available, restrictive covenants or other conditions may prevent it being used for waste management.

Where sites are available or are otherwise considered to be suitable for waste management there are broadly two options available to the potential operators with regard to site acquisition:

1. Agree a lease with landlord (leasehold)

A site can be acquired by securing a lease with the freeholder of the site. This would require both parties agreeing suitable lease terms, which include lease length, rent and possible break clauses. Where there are limited funds this is the cheapest option available.

2. Buy freehold / long leasehold

A site can be acquired by purchasing the freehold or long leasehold. If the site has tenancies this would impact upon the potential deliverability of the site. The lease lengths and break options of the tenancies will have to be considered when purchasing the freehold and factored into deliverability timescale.

The potential for the compulsory purchase of sites by the local authority is not considered within the scope of this study.

With respect to the potential for land assembly, in general, this is less complex where the sites in question are in the same ownership or where the number of different landowners is limited and where the sites are vacant, or underutilised, rather than occupied. If occupied, then land assembly is typically easier where the number of occupiers is small and where their leases all expire at a similar time. In addition, land assembly is usually easier where the existing uses are the same (e.g. all industrial).
For example, with respect to the potential for waste management development, sites that might otherwise be considered suitable for land assembly might not have this potential if say one site is in industrial use but another is in higher value retail or office use, as the landowner of the latter is likely to want to retain the land for its higher value use.
4 SITE ASSESSMENTS

This section provides an overview of our site assessments. More detail is provided in tabular form in Appendix 1, which includes a list of the occupiers and landowners that we contacted and received responses from. We refer to availability/deliverability within certain timescales as follows: short term (5 years), medium term (5-10 years) and longer term (10-15 years). The sites are considered in the order they are listed in tables 2.2 to 2.6 inclusive of the Stage 2 Consultation document.

4.1 EXISTING WASTE SITES

Site 1: Factory Lane Transfer Station
Site comprises 1.79 ha and is owner occupied by Croydon Borough Council. The site is currently used by the council as a car pound and waste site with a Civic Amenity facility located at the site. The South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs’ residual municipal waste.

In our assessment, the site as a whole has good potential for deliverability in the short, medium and longer term by another operator, subject to the relocation of existing occupiers, and further discussions with the real estate department at Croydon Borough Council and the South London Waste Partnership.

Site 6: Villiers Road Waste Transfer Station
Site comprises a waste transfer station with the freehold owned by the Royal Borough of Kingston. The site is currently occupied by waste occupiers SITA, Environmental Waste Controls (a contractor for the South London Waste Partnership), Veolia and Quadron. All waste contractors are operating on the site under a licence basis and the Royal Borough of Kingston is currently negotiating to put leases in place. The site is suitable for waste use and is offered to bidders involved in the currently residual waste procurement work of the South London Waste Partnership. The site could be made available for the South London Waste Plan, although this would involve relocating all current occupiers.
In our assessment, the site as a whole has good potential for deliverability by another waste operator in the short, medium and longer term, subject to the relocation of existing facilities and subject to the procurement partnership putting this site forward to bidders in its procurement documentation and incorporating it into the South London Waste Plan.

**Site 126: Benedict Wharf Whole Site**
The Benedict Wharf site is owner occupied by SITA and is circa 3.7 ha. The site was previously being run as a waste station that served all four boroughs within the South London Waste Plan. SITA had a change in operations and the site is no longer used as waste station for all four boroughs. There is a planning application for the site and SITA is developing it as a merchant facility (for private contract).

SITA has no plans to dispose of the freehold or lease the site as it is seen as a critical site for its business. SITA has recently submitted a planning application to Merton Borough Council to develop a new waste facility on this site. In our assessment, this site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

**Site 9: Garth Road Civic Amenity Site**
Garth Road Civic Amenity site comprises a waste transfer station that is owned by Merton Borough Council. The site is currently occupied by Merton Borough Council Waste and Transport depot (incorporating the Household Waste and Recycling Centre).

This site is suitable for waste and could be made available for inclusion in the South London Waste Plan, although it would require all current occupiers to be relocated.

In our assessment, the site as a whole has good potential for deliverability by another operator in the short, medium and longer term, subject to the council relocating existing facilities and incorporating the site into the South London Waste Plan.
Site 22: Willow Lane Industrial Estate
The site is located within Willow Lane Industrial Estate and is 1.025 ha. The site comprises a warehouse and service yard. The site is owner occupied by B Nebbett & Son Ltd which has no plans to dispose of the freehold or lease the site.

In our assessment, the site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

Site 17: Beddington Lane, Country Skip Hire
Site comprises 2.38 ha and is owner occupied by Country Waste. We understand the Country Waste has spoken with the South London Waste Plan and is keen to develop its site for waste management purposes and expressed an interest in discussing this further with the partnership boroughs.

In our assessment, whilst the site has good potential for deliverability in the short, medium and longer term only by the current owner, it has low potential for delivery by any other waste operator.

Site 21: Beddington Lane, Coomber Way
Site comprises 0.97 ha and the freehold is owner occupied by 777 Demolition and Haulage Company Ltd. The company has no intention to lease or sell the freehold of the site in the short, medium or longer term as it has taken some time to acquire the site from various land owners.

In our assessment, the site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.
Site 100: Beddington Lane, Therapia Way
Site comprises 1.04 ha and is owner occupied by European Metal Recycling (EMR). EMR has put substantial capital investment into the site and has no plans to sell the freehold in the short, medium or longer term.

In our assessment, the site has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

Site 97: Beddington Lane, Severnside Waste Paper
Site comprises a waste paper plant and the freehold is owned by Severnside which occupies approximately 0.9 ha. Severnside intends to maintain occupation in the short, medium and longer term but discussions with Severnside indicate that the occupier could relocate in the longer term if a suitable alternative site is found.

There is good potential for deliverability only by the current operator in the short and medium term and the possibility of deliverability by another operator in the longer term if an alternative site is found for the current occupier.

Site 18: Viridor Recycling Centre, Beddington Farmlands
The site's freehold is owned by Thames Water and Viridor Recycling has a long leasehold on the site. This current lease expires in 2019 when the site is then split into two leases with one running until 2031 and the other until 2108. Viridor Recycling has a contract for works until 2023 so will remain in occupation until then.

In our assessment, this site has good potential for deliverability in the short, medium and longer term only by the current owner but low potential for delivery by any other waste operator, due to the current occupier’s future intentions.
Site 86: Days Aggregates

The freehold of this site is owned by Network Rail and Days Aggregates has a lease on the site. The site is nominated as a Strategic Freight Site (see note on conditions limiting availability for waste management in section 3).

Days Aggregates intends to renew its lease but did not rule out the possibility of vacating the site.

In our assessment, this site has low potential for deliverability in the short, medium and longer term due to the covenants imposed on the lease from Network Rail Strategic Freight Sites.
4.2 NEW SITES

Site 105: Factory Lane Industrial Estate
This site has multiple ownership and multiple occupiers. The site is split into three different ownerships. BBC Pension Fund own the freehold to the Wandle Park Estate. There are a total of six units, three are vacant and all leases expire in 2017. CBRE Investors who manage this site indicated that BBC Pension Fund will not sell the freehold of the site.

EDF Energy owns the freehold to 52 Factory Lane. There is a total of six units with three owner occupied by EDF Energy and the other three units let to Barry Kirkdale Dry Cleaners and Petite Forester both with five years left on the lease. EDF is in the process of selling the operational part of the business that owns this site, so the purchaser will take over the freehold of this site. As at October, EDF has no plans to sell the freehold, and the timescales of the sale are currently confidential. However our contact at EDF said that if the site was still required for operational use, the new purchaser is likely to retain the freehold.

56-58 Factory Lane is owner occupied by Terriman Limited. This site is circa 0.9 ha. Terriman Ltd has no plans to sell the freehold or lease the site out.

In our assessment, this site has low potential for deliverability in the short, medium and longer term.

Site 125: Factory Lane (South Side)
The freehold of this site is owned by Oyster Jersey Property Fund but Tesco has a 10 year lease remaining. Tesco has leased this site with the intention of developing a store. It therefore will be retaining the lease for this period.

In our assessment, the site has low potential for deliverability for waste management in the short and medium term, but possible potential in the longer term, on expiry of Tesco’s lease.
Site 99: Purley Oaks Highway Depot
This site is owner occupied by Croydon Borough Council. The site is used by the Council’s Highways Section. We would recommend that the borough’s real estate team discusses potential deliverability with South London Waste Plan.

In our assessment, this site has possible potential for deliverability in the short, medium and longer term, subject to the Highways Section being relocated.

Site 47: Land at Kingston Road/Jubilee Way junction, Tolworth
Site comprises 1.72 ha of open land with the freehold owned by the Royal Borough of Kingston. The site is currently occupied jointly by the Council’s Youth Service and a private motorcycle training company. The motorcycle training company has operated on the site on an annual licence basis, although the most recent licence expired at the end of 2009 and has, to date, not been renewed. Although we understand that an application is currently being processed by the Royal Borough of Kingston, for the youth service to continue occupation on this site.

In our assessment, the site has good potential for deliverability in the short, medium and long term, dependant on the intentions of the Royal Borough of Kingston with regard to the site.

Site 46: Leatherhead Road, Chessington, Coal Depot adjacent to Barwell Business Park
Site comprises a coal depot on 3.42 ha and the freehold is owned by Network Rail. The site is classed as a Strategic Freight Site. The site is leased to CPL Distribution and the lease is currently due for renewal and negotiations between the two parties are in place. Network Rail intends to renew with CPL Distribution for a further 12-15 years and CPL Distribution intends to remain on site for the short, medium and long term.

In our opinion, the site has low potential for deliverability for waste, as it is restricted by the sites classification as a Strategic Freight Site (see section 3).
Site 641: Area east of Weir Road, Durnsford Road Industrial Area
Merton Borough Council owns the freehold of the whole of site 641, which is all leased on long ground leases (with roughly 70 years remaining to their expiry). The Council undertook a review of the potential of this site as part of a wider property audit in 2008 and its key objective is to retain and improve the income stream available from the site, for example by offering to undertake sale and leasebacks with occupiers, whereby the Council might buy an occupier’s existing ground lease and grant the occupier a shorter lease in return for a ‘rack rent’, ie a full open market rent. This strategy, which was endorsed by the Council’s senior Corporate Management Team, does not rule out a waste use on part of the site, but any waste operator would clearly have to acquire a leasehold interest first. There is a council waste site on this area at 36 Weir Road. In addition the waste operator SITA is currently redeveloping a transfer station on a site of 0.3 ha (leased from Merton Borough Council).

A number of occupiers we spoke with told us that they had relatively long-term leases and wished to remain on site.

In our assessment, the site overall has possible potential for deliverability for waste in the short, medium and longer terms due to the fact that the site is in single ownership by Merton Borough Council. Although the council strategy is not focussed on attracting a waste user to this site, it is interested in trying to increase the income stream and in this respect it would not rule out a waste use.

Site 136: Deer Park Road
Site comprises 1.45 ha and is made up of multiple ownerships and occupiers. Ringdeen Investments Limited owns the freehold to part of the site and the remainder is owned by owner occupiers.

In our assessment, the site has low potential for deliverability in the short, medium and longer terms due to the multiple ownership of the estate.
Site 702: Garth Road Industrial Area

This site is made up of multiple ownerships and occupiers. The majority of sites are owner occupied and individual sites are small. 193 Garth Road is the largest industrial estate in the Garth Road Industrial area, but the majority of units are all owner occupied.

Due to its proximity to Site 9 Garth Road Civic Amenity Site, this area has low potential deliverability in the short, medium and longer term as the multiple ownerships and occupations would require many freehold purchases and land assembly.

Site 651: Part of Plough Lane Industrial Area

This site off the south side of Plough Lane and including Waterside Way is in multiple ownership and includes a Wickes retail warehouse, the Plough Lane retail park, a car dealership owner occupied by Vauxhall, a site used for car auctions and a range of other uses. Blackrock owns the Wickes warehouse and the Plough Lane retail park (including Carpetright and Currys) and intends to keep this land in retail use, where the value is. The Manheim Auctions site, which totals c. 2.83 ha (7 acres), is owned by Manheim who wishes to remain here. Other occupiers we spoke with told us that they wished to stay on this site. Therefore, in our assessment this site has low potential for waste management over the short, medium and longer term.

Site 60: Rainbow Park Industrial Estate

Site comprises a multi-occupied industrial estate within 3.18 ha of land, occupied mainly by transport and coach firms. The freehold for the estate has been owned by Workspace Group since 1994, and Workspace Group generally operates a policy of short term leases for occupiers. Leases for current occupiers expire within the next three to five years, with one occupier on a longer term, but Workspace has confirmed that the particular occupier is amenable to vacating early. Vacant possession of the site could be achieved within five years and the owner is keen to make the site available for waste use. Workspace also owns the freehold to the property at the entrance to the estate, which could be altered to improve access to the site.
In our assessment, the site is suitable for waste use and has good potential for deliverability for waste management in the short, medium and longer term.

**Site 127: Willow Lane Area by Wandle River**

This site is adjacent to the Willow Lane Industrial Area in Mitcham and consists of three parts. 43 Willow Lane has recently been developed as a waste treatment facility managed by Vertal, 35-37 Willow Lane which has recently gained planning permission for a waste transfer use to be managed by B Nebbett & Son and 39 Willow Lane which is owned by City and Provincial Properties Plc. The site at 43 has good potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator. The site at 35-37 Willow Lane has possible potential for deliverability in the short, medium and longer term only by the current owner, but low potential for delivery by any other waste operator.

The site at 39 Willow Lane is owned by City and Provincial Properties Plc and is let to 8 tenants with all leases expiring in 2018. The landlord has no plans to sell the freehold but in our assessment we see some potential for the medium and longer term when the leases expire in 2018. Although this site is below the required 0.9 ha, we consider that this site is worth monitoring and although it has low potential for deliverability in the short term, it has possible potential in the medium and longer term, particularly with regard to the potential for land assembly with the adjacent waste sites.

The site as a whole has low potential for deliverability in the short term but possible potential in the medium and longer term.
Site 57: Land west of Beddington Lane adjacent to industrial areas and existing waste management facilities
Site comprises 6.76 ha and is owner occupied in two parts. Waste operator, Sterecycle owner occupy the northern half of the site and waste operator Cappagh owner occupy the southern part of the site via a subsidiary of Cappagh called Ferncombe Properties.

In our assessment, the site has good potential for deliverability for waste management in the short, medium and longer term by the current site owners. However, it has low deliverability for any other operator, as the occupiers intend to retain ownership of the site.

Site 104: Purley Way, Lombard Business Park
This site is located on the Purley Way in Croydon. The site is split into two, with Lombard House comprising office space and Lombard Business Park comprising industrial space. There are 8 units at Lombard Business Park with varying lease lengths.

Workspace Group own the freehold for both Lombard House and Lombard Business Park. Workspace has no current intentions to sell the freehold.

In our assessment, the site has low potential for deliverability in the short, medium and longer term.

Site 124: Former Government Offices, Hook Rise South, adjoining sites fronting Kingston Road and Tolworth Station, Tolworth.
Site comprises 3.24 ha of vacant land and the freehold is owned by Tesco which intends to develop the site as a retail store with a high residential component. No planning secured.

In our assessment, it has low potential for deliverability in the short, medium or longer term, due to the current owner’s future intentions.
Site 41: Kingston Road, Tolworth Aggregates Depot south of railway.
Site comprises an aggregates depot on 2.85 ha, with the freehold owned by Network Rail. The site is classed as a Strategic Freight Site. Freight operator DB Schenker own the long leasehold to the site with a term of 125 years from 1994. The site is currently occupied by Days Aggregates on a lease expiring in 2027 and the occupier has no intention of vacating prior to lease expiry.

In our assessment, this site has low potential for deliverability in the short, medium or longer term, due to the current lease length and intentions of the occupier.

Site 45: Leatherhead Road, Chessington, Barwell Business Park
Site comprises a multi-occupied, modern business park on 7.71 ha. The freehold to the site is owned by investment fund Aviva, with the ownership split into two parts. Aviva Link Life Fund owns Phase 1 of the business park which comprises approximately 35,000m² in 48 business units. Aviva Investors Pensions owns Phase 2 which comprises two terraces of modern business units, let on ten year leases. Aviva intends to maintain ownership of the site as a long term investment, with no intention to sell for redevelopment.

In our assessment, the site has low potential for deliverability for waste management in the short, medium or longer term, due to its prominent use as a business park and the freeholder’s future intentions.

Site 36: Leatherhead Road, Malden Rushett, Silverglade Business Park
Site comprises a multi-occupied, modern business park on 2.15 ha. The freehold is owned by Hampshire County Council Pension Fund, and managed by CBRE Investors. The business park is fully occupied, with lease lengths running for 5-10 years. CBRE Investors advised us that the fund intends to maintain ownership of the site, with no intention to sell for redevelopment.

In our assessment, the site has low potential for deliverability for waste management in the short, medium or longer term, due to its current use as a modern business park, and the freeholder’s long term intentions.
Site 33: Red Lion Road, Tolworth

Site comprises a multi-occupied industrial estate in a predominantly residential area, with industrial units ranging in size (200-1,000m²) and age. The site includes newly developed Chancerygate industrial units and a children’s day nursery at the entrance to the estate, with older terraces of industrial units at the back of the estate. There is also an area of 1.2 ha of open storage land, currently used for car storage for various auto-repair companies.

The industrial units are in multi-ownership, with a large number of owner occupiers, none of which told us that they intended to vacate in the short, medium or long term. Where units are leased, lease lengths generally run for a further five to nine years. The open storage land is currently being marketed to let on behalf of the freeholder Leith Ltd. However, Leith Ltd wishes to retain the freehold to this site and do not want to redevelop the site for industrial use, due to the proximity to local schools and nursery. The freeholder recently submitted a planning application for an elderly care village, although the outcome of this is not known. Leith Ltd applied to purchase the freehold to the whole estate in 1999 but was unsuccessful because of the complicated multi-ownership structure.

In our assessment, the site as a whole, has low potential for deliverability for waste management in the short, medium or long term due to the complex multi-ownership structure of the estate. In addition, there are no areas of a suitable size with potential deliverability within the timeframes.

Site 751: Burlington Road west side junction with A3

This site is in multiple ownership and occupation and includes the Wyvern Industrial Estate and a large new B&Q Extra that has recently opened. The former includes a number of occupiers including Big Yellow, which owns its unit, Halfords and Harveys.

In our assessment, this site has low potential for waste management in the short, medium and longer term due to the intentions of current occupiers and the recent development of the B&Q Extra unit.
Site 73: Bushey Road Industrial Area
This site has been developed for retail use and currently has two large retail warehouse occupiers on it, namely Pets at Home and Topps, Tiles and Thales. Pets at Home leases its units from AXA and Topps Tiles is a sub-tenant of Pets at Home. We were not told lease details from either party but Pets at Home has a number of years left to run on it lease. Both occupiers told us that they would like to stay on this site.

In our assessment, given its current use and the aspirations of the existing occupiers, this site has low potential for deliverability for waste management in the short, medium or longer term.

Site 61: Dundonald Road Industrial Estate
The site comprises 3.69 ha of land with the freehold owned by Network Rail. The site is on a long leasehold to freight operator Colas, on a 50-year term from 1994. Colas’ lease runs to 2044 and discussions with the occupier suggest that it has no intentions to vacate prior to this.

In our assessment, the site has low potential for deliverability for waste management in the short, medium or longer term due to the current occupier’s lease length and future intentions.

Site 492: Kimpton Industrial Estate, Land East of Kimpton Road
Site comprises 7.69 ha of multiple ownership industrial estates. None of the occupiers we spoke with gave intention of vacating in the short, medium and longer terms.

Therefore, in our assessment, the site has low potential for deliverability in the short, medium and longer term.
Site 102: Purley Way, Lysander Road and Imperial Way Industrial Area

This site is in multiple ownership and multiple occupation, with smaller multi-let estates namely Lysander Road Trading Estate and Stafford Cross Industrial Estate. The freehold to Lysander Road Trading Estate is owned by the Coal Pension Fund and the freehold to the Stafford Cross Industrial Estate is owned by Royal London. All institutional investors that we contacted had no intentions to sell the freehold to the estates in the short, medium or longer term. The site also includes the Silverwing Industrial Estate, owned by Shell Pension Fund, which considers this estate to be a long-term investment hold.

In our opinion, the site has low potential for deliverability for waste management in the short, medium and longer term.

Site 351: Moor Lane, Chessington, Chessington Industrial Estate

Site is a multi-occupied, multi-owned industrial estate with smaller multi-let estates, namely Chessington Park and Chessington Trade Park. Chessington Park is owned by investment fund Eskmuir with leases expiring from 2012 although Eskmuir intends to maintain ownership of the estate as a long term investment. Chessington Trade Park and units along Roebuck Road/Cox Lane are mainly owner occupied, with some leasehold occupiers. Generally all occupiers are looking to maintain ownership or renew leases for the long term.

A modern distribution unit of 11,200m² on the corner of Cox Lane and Mount Road is occupied by Bell Micro with the freehold owned by Aviva. The occupier intends to vacate by the end of 2010 and whilst the fund’s intention is to hold the asset, we believe there may be some potential for deliverability when the unit becomes vacant.

In our assessment, whilst the site as a whole has low potential for deliverability of waste management in the short, medium or longer terms, due to the complex multi-ownership structure, a site of 11,200m² (1.1ha) within this site has the potential to become available in the short term.
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Site 352: Moor Lane, Chessington, Chessington Industrial Estate
Site is a multi-occupied, multi-owned industrial estate with smaller multi-let estates, namely Davis Road Industrial Estate and King George’s Trading Estate. Davis Road Industrial Estate is owned by Aviva with leases expiring from 2017-2021. The fund’s intention is to maintain ownership of the estate as a long term investment. King George’s Trading Estate is owned by USS (Universities Superannuation Scheme) with leases expiring from 2016-2023. USS also intends to maintain ownership of the estate as a long term asset. Generally all occupiers along Cox Lane and Davis Road are looking to maintain ownership or renew leases for the long term.

At the site at the end of Davis Road, bounded by Jubilee Way, Thales occupies 4,771m² of office space on a long term lease of 51 years from Compass House Investments. However, Thales is looking to vacate this unit and owns the freehold to 0.4 ha of car parking space. This land may, therefore, be deliverable in the short term but is unlikely to suit the minimum size threshold required. Land assembly in this area may be required to achieve the required site size.

In our assessment, the site as a whole has low potential for deliverability in the short, medium or longer term, although the site occupied (and car park owned by) Thales at the end of Davis Road, could have potential for deliverability in the medium to longer term, which may require land assembly.

Site 353: Moor Lane, Chessington, Chessington Industrial Estate
Site is a multi-occupied, multi-owned industrial estate with smaller multi-let estates, namely Hook Rise Business Centre and Hook Rise South. The Hook Rise Business Centre is owned by AXA and managed by NB Real Estate, and AXA intends to maintain ownership for the longer term. Hook Rise South is owned by Pace Trustees which intends to maintain ownership. Generally units along Oakcroft Road are owner occupied and occupiers gave no intention of vacating in the short, medium or long term.

In our assessment, the site has low potential for deliverability for waste management in the short, medium and long term as a result of the intentions of current occupiers and freeholders.
Site 642: Durnsford Road Industrial Area

Merton Borough Council owns a significant part of this site, and leases this land on long ground leases. Merton Borough Council confirmed to us that its ownership excludes three plots namely: the Sainsbury / Homebase site, the Vantage House office block (1 Wear Road) and a third site which we understand is the Booker unit off of Endeavour Way, which is leased from the Lancashire County Council Pension Fund. The site includes some small starter units which the Council owns.

As with site 641, the Council undertook a review of the potential of this site as part of a wider property audit and its key objective is to retain and improve the income stream available from the site. This strategy does not rule out a waste use on part of the site, but any waste operator would clearly have to acquire a leasehold interest first.

A number of occupiers we spoke with told us that they had relatively long-term leases and wished to remain on site.

In our assessment, the site overall has low potential for deliverability for waste in the short, medium and longer terms due to the multiple occupiers on the site and the fact that the strategy being adopted by Merton Borough Council, whilst not ruling out a waste use, does not focus on this type of activity.

Site 69: Willow Lane Industrial Estate

Site comprises 41.45 ha of multiple ownership industrial estates. The estate is a mix of owner occupiers and leaseholds with Merton Borough Council owning three areas, namely: 52-58 Willow Lane; land on either side of Ossier Way; and an area of land between Wandle Way and Ossier Way, which it leases to occupiers on long ground leases. As with site 641 and site 642, the Council undertook a review of this site as part of a wider property audit, and its key objective is to retain and improve the income stream available from the site. This strategy does not rule out a waste use on part of the site, but any waste operator would clearly have to acquire a leasehold interest first.

In our assessment, the site has low potential for deliverability for waste management due to the complex multi-ownership structure.
Site 5312: Beddington Industrial Area
Site comprises 4.27 ha with a single industrial unit of c 5,000m² occupied by Carlsberg. Gerald Eve manage the freehold of the unit and Carlsberg intend to maintain in occupation for the foreseeable future.

In our assessment, the site has low potential for deliverability for waste management in the short, medium and longer term.

Site 532: Beddington Industrial Area - Zone 2
This site is located on the Mitcham Road within the area known as Beddington Farmlands. 681 Mitcham Road freehold is owned by HSBC Property Unit Trust and managed by Hermes Real Estate. The freehold is five industrial units totalling 8,360m². Hermes has only recently purchased the freehold of the property so its short term plan is to hold the asset. The other part of the Site 532 is owned by Townside Investments Limited which intends to hold the site for residential development.

The site has low potential for deliverability, in the short, medium and longer terms due to the future intentions of the current freeholder’s.

Site 533: Beddington Industrial Area - Zone 3
Situated on the west side off Beddington Lane, north of Jessop Way, this site is in multiple ownership and occupation. It includes two industrial estates owned by different pension funds, namely Brookmead Industrial Estate, managed by CBRE Investors on behalf of a pension fund client, and Beddington Lane Industrial Estate, managed by LaSalle Investment Management on behalf of the Coal Pension Fund. We were informed that both pension funds considered these estates as long term ‘holds’ for investment purposes.

In our assessment, given the intentions of the existing owners, this site has low potential for deliverability for waste management in the short, medium or longer term.
Site 534: Beddington Industrial Area Zone 4
The site comprises 4.88 ha and the majority is currently owned and occupied by Severnside Waste Properties Ltd. Also in occupation on the site is 777 Demolition, Haulage Co Ltd and Mitcham Builders Merchants.

Mitcham Builders Merchants currently lease 152 Beddington Lane, on a long lease (25 years), from a private landlord. It would ideally like to buy the freehold of this site and its plans are to develop the site for its own business purposes.

Site 21 covers the intentions for 777 Demolition and Haulage Co Ltd.

Severnside intends to maintain ownership of the site for the long term so whilst the site has possible potential for deliverability in the short, medium and longer term by the current waste occupier, it has low potential for deliverability by any other waste occupier.

Site 535: Beddington Industrial Area - Zone 5
Situated on the west side off Beddington Lane this site is in different ownerships. The site has a range of occupiers including Tone Scaffolding and D&M Transport and also includes an estate owned by the Shell Pension Trust.

In our opinion, this site has low potential for waste management development because of the different ownerships and occupiers told us they will remain in occupation here.

Site 539: Beddington Industrial Area Zone 9
Site comprises 13.48 ha of multiple ownership industrial units and estates. Includes the Pioneers Industrial Estate, owned by Ignis UK Property Fund, with leases on units running for a further 10-15 years and the freeholder intends to maintain ownership for the long term. Dingwall Motor Auctions owner occupy the area to the south east of the site and has no intention of vacating in the short, medium or longer term. The Volvo Truck & Bus units are owned by Volvo, and the Croydon Mail Centre is owned by Royal Mail. Neither owner occupier intends to vacate the site.
In our assessment, this site has low potential for deliverability for waste management in the short, medium or longer term, due to the complex multi-ownership structure and the future intentions of current occupiers.

**Site 491: Kimpton Industrial Estate, Land North of Minden Road**

Site comprises 5.12 ha of industrial space and a civic amenity site, of which the majority is owned by Sutton Borough Council, with long leaseholds to occupiers. The site includes the Kimpton Trade and Business Centre which is owned by the Industrial Property Investment Fund (IPIF) which intends to maintain ownership of this estate.

Valad holds a long leasehold from Sutton Borough Council of 250 years on part of the site, including where the io Centre has been developed and the open land between the io Centre and the Civic Amenity Site. This open land (c 2 ha) has possible potential to be deliverable for waste management and Valad is in discussions with Sutton and Merton Borough Councils.

Other occupiers hold long leaseholds of up to 40 years with no intention of vacating in the short, medium or longer term.

In our assessment, the open land portion of the site (c 2 ha) has possible potential for deliverability for waste management in the short, medium and longer term.

**Site 1006: Wandle Road Trading Estate**

This site comprises a 3.07 ha industrial estate and City and Provincial owns the freehold, which includes the Wandle Technology Park, the Wandle Trading Estate and the land between Mill Green Road and Wood Street.

City and Provincial is keen to develop the site for an energy/waste plant on the site of the Wandle Technology Park only. The Wandle Technology Park comprises approximately 2 ha and all occupiers on the park are on short term leases that expire within 12 months.

In our assessment, the Wandle Technology Park portion of the site (c 2 ha) has good potential for deliverability in the short, medium and longer term.
5 CONCLUSIONS

Having regard to the above site assessments, this section highlights the key sites that we consider to be potentially available for the South London Waste Plan over the short (5 years), medium (5-10 years) and longer term (10-15 years).

5.1 EXISTING WASTE SITES

Existing waste sites that we regard as having good potential for deliverability in the short, medium and longer term, subject to relocation of existing occupiers or inclusion within the South London Waste Plan:

Site 1 (1.79 ha): Factory Lane Transfer Station. Site currently used as a waste site. Deliverability likely, although dependant on discussions between Croydon Borough Council real estate team and the South London Waste Partnership as to the councils future options for the site.

Site 6 (1.86 ha): Villiers Road Waste Transfer Station. Site currently used as a waste site. Deliverability likely, although dependant on the relocation of existing waste facilities.

Site 9 (2.05 ha): Garth Road Civic Amenity Site. Site currently used as a waste site. Deliverability likely, although dependant on discussions between Merton Borough Council real estate team and the South London Waste Partnership as to the councils future options for the site, and the relocation of existing waste facilities.

Existing waste sites that we regard as having good potential for deliverability in the short, medium and longer term by the current occupying waste operator, although low potential for any other waste operator:

Site 126 (3.87 ha): Benedict Wharf Whole Site. Good deliverability potential but only with current waste occupier SITA.

Site 22 (1.03 ha): Willow Lane Industrial Estate. Good deliverability potential but only with current waste occupier B Nebbett & Son Ltd.
Site 17 (2.38 ha): Beddington Lane, Country Skip Hire. Good deliverability potential but only with current waste occupier Country Waste.

Site 21 (0.97 ha): Beddington Lane, Coomber Way. Good deliverability potential but only with current waste occupier 777 Demolition & Haulage Co Ltd.

Site 100 (1.04 ha): Beddington Lane, Therapia Way. Good deliverability potential but only with current waste occupier European Metal Recycling.

Site 97 (0.96 ha): Beddington Lane, Severnside Waste Paper. Good deliverability potential but only with current waste occupier Severnside.

Site 18 (4.02 ha): Beddington Farmlands, Viridor Recycling Centre. Good deliverability potential but only with current waste occupier Viridor Recycling.

5.2 NEW SITES

New sites that we regard as having good potential in the short, medium and longer term for deliverability for waste management:

Site 47 (1.72 ha): Land at Kingston Road, Jubilee Way Junction, Tolworth. Site scores well against suitability criteria for waste management and is open land currently utilised jointly by the council and private individual. However, no lease is in place with current occupiers hence site could be vacated.

Site 60 (3.18 ha): Rainbow Park Industrial Estate. Site scores well against suitability criteria for waste management and vacant possession of the site can be achieved within five years. Current freeholder is keen to make the site available for waste use.

Site 57 (6.76 ha): Land west of Beddington Lane. Site currently in waste use, and has good potential for deliverability but only with current waste occupiers Sterecycle and Cappagh, although low deliverability by any other waste operator.

Site 1006 (c 2 ha): Wandle Road Trading Estate. Freeholder is keen to develop the Wandle Technology Park portion of the site (c 2 ha) for energy/waste use, and the park can be made available in the short term.
LAND AVAILABILITY STUDY FOR SOUTH LONDON WASTE PLAN

New sites that we regard as having possible potential in the short, medium and longer term for deliverability for waste management:

**Site 99** (1.68 ha): Purley Oaks Highway Depot. Possible potential if council Highways Section is relocated.

**Site 351** (c 1.1 ha): Moor Lane Chessington Industrial Estate. Possible potential for site on corner Cox Lane/Mount Road (c 1.1 ha).

**Site 491** (c 2 ha): Kimpton Industrial Estate, Land North of Minden Road. Possible potential on Valad site behind Civic Amenity site (c 2 ha).

**Site 534** (4.88 ha): Beddington Industrial Area Zone 4. Possible potential for deliverability but only with current waste occupier Severnside.

**Site 641** (c 0.7 ha): Area east of Weir Road, Durnsford Road Industrial Area. Possible potential based on the SITA transfer station (c 0.7 ha), and the site is all within the ownership of Merton Borough Council.

Sites that we regard as having possible potential in the medium or longer term for deliverability for waste management:

**Site 125** (3.11 ha): Factory Lane (South Side). Possible potential in the longer term on expiry of Tesco lease.

**Site 127** (1.94 ha): Willow Lane Area by Wandle River. Possible potential in the medium and longer term on expiry of current leases.
LAND AVAILABILITY STUDY FOR SOUTH LONDON WASTE PLAN

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Appendix 2: Notes of meetings with landowners and waste operators
ES explained the reason for the meeting. ES stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings are to assess the deliverability of sites which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

D clarified that his information would be from the perspective of the consortiums participation in the South London Waste Partnership’s PFI process.

D the greatest amount of waste arisings were (in descending order) from Croydon, Sutton, Merton and then Kingston. Given, this RfW have identified a ‘centre of gravity,’ in terms of waste arisings for the four boroughs, which centres around the Beddington Lane area. This will reduce the movement of waste amongst the four partnership boroughs, which is considered important.

D then briefly described the existing waste movement patterns of the four boroughs (Kingston to the Villiers Rd site and all the other boroughs to the Beddington site). Something similar to the existing arrangement would therefore probably be the ideal solution (for the Plan & PFI).

RfW appointed Kings Sturje as land agents to focus on the availability of the SLWP ‘potential sites’ in the Beddington Area, Willow Lane and Purley Way. These areas were chosen as they were near the ‘centre to gravity’ for the waste arisings. Criteria for the site search were a minimum size of 3 hectares (although D considers the optimum sites to be at least 4 hectares) and whether the site is available now. The minimum site size was considered to be important in providing a single site solution for the procurement partnership since developing a single site is cheaper than developing multiple sites. D stated that the ‘ideal’ site size for a single 200kTpa MBT plant is 3Ha. If you are utilising smaller sites (say 2 x 2Ha) then this will probably result in two 100kTpa MBT plants. If you are trying to deliver a single site solution i.e. 200kTpa MBT + thermal treatment plant on the same site, then you would need a ‘minimum’ 4Ha site.

The criteria for ‘available’ land was considered important in being able to
RfW considered that a single-site-solution, consisting of 1 MBT plant and 1 Thermal Treatment Plant, would be the most affordable solution.

The Hogsmill site (No. 1003) is considered by RfW to be big enough to locate an oversize MBT and a Thermal Plant, while the transfer station could be at the Factory Lane site, but this site did not receive a positive response from the officers of the local planning authority (Kingston).

Kings Sturge confirmed that there were not many suitable sites on the market and then started ‘cold calling’ site owners.

D then summarised RfW’s findings of the deliverability analysis that they had done for each proposed site:

**Site 105 Factory Lane Industrial Estate, Croydon**
Multiple ownership
DHL is an occupier of a major site (CBRE Investments manage the site for the BBC Pension fund)
No interest to vacate the site

**Site 125 Factory Lane(South side), Croydon**
Large Tesco distribution centre, 10 years lease, Henderson Property Fund

**Site 532 Beddington Farmlands, Sutton**
Multiple ownerships but possible interest from site owners in south eastern corner

**Site 533 Beddington Farmlands, Sutton**
Multiple ownership. The site is bisected by a tramline, which creates awkward shaped smaller sites that are not suitable in size and form for a large PFI facility. There are some empty units.

**Site 534 Beddington Farmlands, Sutton**
Severnside showed some interest in relocating
Mitcham Merchant Builders showed some interest
777 Demolition & Haulage (who occupy the biggest plot on this site) showed no interest
remainder of sites not big enough for a PFI site, though D suggested there may be opportunities for smaller facilities.

Although not a proposed site, the PF Whitehead (warehousing & storage) 2 hectare site adjacent is on the market (for £8 million).

**Site 535 Beddington Farmlands, Sutton**
Multiple ownership (at least 5) and therefore difficult to deliver
The southern portion (scaffold yard?) might be for sale, at the right price
The published site size of 4.65ha in the Stage 2 Consultation document is
considered wrong.

Site 17 Beddington Lane, Country Skip Hire, Sutton
Owners interested in a possible Joint Venture where one of the PFI facilities was located on the site in exchange for an operational contract, but the location of the power-lines restricts the potential of this site as its limited size would require a compact plant layout with tall buildings (2 storey MBT).

Site 539 Beddington Farmlands, Sutton
Site has multiple ‘high value’ owners and tenants such as Royal Mail and Volvo Trucks – unlikely to want to relocate

Site 5312 Beddington Farmlands, Sutton
Carlsberg Distribution Centre – After a recent review of all their sites, Carlsberg had decided to retain this site. This 4ha site does have a scrap metal neighbour but it also has overhead power-lines which restricts the site’s potential.

Site 491 Kimpton Industrial Estate, Land North of Minden Road, Sutton
Recently bought by Valad Property Group from LB Sutton. It has overhead power-lines, which limits the area of the site that could be developed for a PFI scheme. The southwestern sites could potentially be assembled to make a 2.5 – 3ha site. The site has good access and should remain as a potential waste site in the Plan but it is not big enough for a PFI scheme and is near to, and visible from neighbouring dwellings.

Site 69 Willow Lane Industrial Area, Merton
Too many tenants with not much potential for the assembly of a large enough site.

Site 102 Purley Way, Lysander Road & Imperial Way Industrial Area, Croydon
Similar restraints to Willow Lane (Site 69) but many high value business and enquiries have not resulted in any potential responses.

Also looked at the Ullswater Crescent site in Coulsdon (not a SLWP site) but only 7acres (3ha) of this 10acre site (for £10mil) is developable and the site is not well located.

D then substantiated why RfW recommended in their consultation response that the three existing borough owned waste sites (Site 6 Villiers Road, Kingston, Site 9 Garth Road, Merton, Site 1 Factory Lane, Croydon) should be retained.

Site 6 Villiers Road, Atelstan Road, Kingston
The current master plan shows that the land to the east of the site could be developed to facilitate a CHP scheme but in their (RfW’s) discussions with Thames Water (the land owners), they said that the land to the east of the site is not available for any expansion scheme. The Villiers Road site is a “good site” but it is currently used as a recycling centre and is would be better to separate the HGV and residential cars
The site’s viability would be improved if the recycling centre were to be moved. The site has very good potential for CHP due to close proximity (i.e. within 2 miles) of a large number of public buildings e.g. university, hospital, council buildings, leisure centre.

Site 1 Factory Lane, Croydon
This site has the best potential, of the 3 existing ‘borough’ sites, for the development of a PFI facility but the delivery (considered to be planning & political resistance – finding an alternative site) would stifle delivery. The overhead power cables are considered to be an issue, which would constrain the site, but it is still considered deliverable.

Site 9 Garth Road, Merton
This site is not considered particularly deliverable for the PFI scheme. It is very close to residential properties. The access road (Garth Road) has numerous traffic calming measures. The site is highly visible since the land slopes upwards into the site. The are overhead cables (100,000tpa MBT could be put a 2ha site. A 200,000tpa MBT can be done but then stacked vertically – the cost to move high voltage power cable at the Factory Lane site was quoted at approx. £2mil). Merton’s existing facilities on the site would require relocation.

D concluded that Kings Sturge found no available industrial sites of at least 3 hectares in size within the Beddington / Croydon / Merton ‘Centre of Gravity’ area. The only plots meeting the ‘availability’ and ‘3 hectare’ requirements were found to be MOL sites off Beddington Lane.

D recommended that the SLWP officers liaise with the GLA regarding the release of some MOL land to enable the development of waste facilities. Site 57 (the ‘Sterecycle’ and ‘Cappagh site’) is currently the site with the best potential but it currently is being excluded because of the MOL designation.

On the question of the likelihood of RfW delivering a facility in the Plan area, D confirmed that RfW’s current interests are only in delivering the PFI facility for the procurement partnership. RfW is not currently interested in developing a merchant facility for treating waste sourced from local businesses.
Notes of ‘Deliverability’ meeting held with
Viridor Waste Management Limited
on 16 April 2010

Attendance:
(M) Mandeep Jutley – Viridor
(G) Garry Wolfe – Mouchel (Viridor’s consultant)
(ES) Emma Smyth – SLWP
(J) Jeff Wilson - SLWP
(EW) Eben van der Westhuizen – SLWP

ES explained the reason for the meeting. ES stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings are to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

G – Viridor similar views (concerns) about the additional sites listed in the Stage 2a consultation document, as set out in that document.

G explained that they have undertaken a study of the deliverability of the potential sites identified in the work of the South London Waste Plan and have discussed their methodology with the GLA. Their methodology was to start with all sites identified in the development of the Waste Plan and apply the following criteria:

1) Filter out any sites under 3ha. This left 65 sites from the original list of 145
2) Filter out any sites which fell within ‘absolute policy constraints’ identified in the Waste Plan (these being SSSIs, SPAs, SACs etc as well as filtering out any land which was occupied / owned (?) by 5 businesses or more. This left 17 sites.

G explained that the final list of 17 sites was then ranked in order of deliverability.

Top scoring sites (in descending order):
Site 1004 Thames site off Beddington Lane
Site 125 Factory Lane (South side), Croydon
Site 1007 Go Track Site off Beddington Lane, Sutton
Site 57 Land west of Beddington Lane, Sutton
Site 124 Former Government Offices, Hook Rise South, Kingston
Site 18 Viridor Recycling Centre Beddington Farmlands, Sutton
Site 539 Beddington Farmlands, Sutton

G – confirmed that a single 4 to 3ha would be required for a single-site-solution for the PFI and that the table of typical sizes in the current London
(Table 4A.7) Plan is generally acceptable.

G – Clarified that Viridor has been seeking strategically located large sites (3ha) consisting of not more than 5 neighbouring properties (land owners), which was considered a reasonable threshold as any more would make the possibility of land assembly very unlikely.

G – Utilising the above amended methodology, Viridor’s existing site (No.18) came 6th on their ranking of sites. Site 1004 came out at the top of their ranked list. Favourable factors were identified as:

- Although in MOL Viridor has direct access to the land,
- Although site 1004 is a nature conservation site of metropolitan importance it is adjacent to existing waste operations,
- Site 1004 is considered a ‘brownfield’ site,
- Site 1004 has reasonable access,
- Beddington is considered the centre of ‘gravity’ of waste arisings within the plan area, and all boroughs are currently direct delivering into Beddington.

J - enquired about the current throughput and requested whether a consolidated plan could be created showing existing and proposed sites.

ES – further requested details of throughput amounts at existing and proposed facilities and referred to Env. Agency figures.

ES - Requested written confirmation, or otherwise, of Env. Agency throughput figures.

G – PFI contract would require the treatment of approx 212,000tpa. A plan of existing and proposed facilities and throughputs could be generated. The aforementioned assessment of sites was with regards to the treatment of Municipal Solid Waste for the PFI.

G – Confirmed that Viridor is undertaking an assessment of the ownership/availability of the short list of sites, which is likely to be completed in the next 3 weeks.

M - During Viridor’s recent discussions with GLA about the Beddington site (No.18), which is in MOL, the talks were focused on ecological matters.

J – suggested a meeting with Viridor, LB Sutton, the South London Waste Plan and the GLA and recommended that a Strategic Environmental Assessment approach/methodology needs to be used.

G – stated that Viridor were considering both Env. Management & Env. Restoration measures

ES – requested to view Viridor’s data in confidence

M – referred to a Biodiversity Management Plan that had been submitted with
the 2005 planning application. There is also an April 2009 Phase1 Habitat survey that would be relevant to the Thames (former Cemex) site of Beddington Lane (Site No.1004).

G – a scoping report would be submitted with any detailed planning application.

G – With regards to traffic, no formal studies have been done. A joint study might be done for all the Partnership sites.

G – If the former Cemex site (No.1004) were to be utilised then it is considered that there is likely to be a limited local traffic impact due to the scale of the recycling facilities to be provided and the difference in vehicle types.

M – Gave the example of the proposed gasification plant (submitted by Beddington Heat & Power), which would result in a reduction in trips of approximately 3000p.a.

M - In comparison with the existing (recent) use of the former Cemex site, it is considered that a waste use could possibly result in no net increase in journeys

M - The current Anaerobic Digester proposal is considered to result in a limited impact.

ES - Asked where additional C&I waste volumes would be sourced from

G - clarified that C&I would be local waste arisings


ES – confirmed that SLWP officers would respond to Mouchel to clarify this.

M – On the question of other facilities proposed in the area, M clarified that there will only be minor works on the existing landfill, to deal with the gas generated at the existing landfill site, at the end of its lifetime.

M – confirmed that their recent analysis of sites was only with regards to potential PFI sites and not Merchant Facilities.

J – Asked how the former Cemex site (No.1004) compared to the redevelopment of the existing Viridor Site (No.18) in terms of the impact on MOL.

G – Considered the impact on visual amenity and ecology would be similar

J – The former Cemex site (No.1004) protrudes further to the west (narrowing the band of open space/MOL) and is considered to have a broader impact on
the land to the north and bigger intrusion into the land safeguarded for the Wandle Valley Regional Park.

G – The scoring methodology only awarded points with regards to its location within or outside of MOL. The sites in the MOL need to be scored to compare their relative impacts on MOL.

J – The development of the former Cemex site (No.1004) would have significant impacts on the MOL and he expressed reservations about the GLA accepting such a proposal.

M – The site considerations have to be linked to the context of PFI delivery time.

G – confirmed that political resistance has not been taken into consideration as part of the deliverability assessment.
ES: Explained that the purpose of the meeting was to discuss the deliverability of the sites in the Waste Plan and to discuss the status and availability of new waste data.

FS: New waste flow data would be available Friday 23 April 2010. FS Invited ES to contact Entec to obtain this information.

ES: The Planning Inspectorate has advised that the Mayor’s Municipal Waste Management Strategy (MWMS) is relevant to the Plan.

FS: MWMS is to be completed by July 2010

ES: SLW Plan would like to be included in the list of consultees

FS: Agreed that the Waste Plan lead is on the consultation list and invited ES to contact Malcolm Kendall, the procurement partnership’s technical lead officer to ask when this will be out for consultation

ES: What are the Partnership’s requirements beyond 2021?

FS: The Partnership’s existing landfill contract ends in 2022 but the contract allows an extension by a further 5 years, to 2027. FS considered it likely this extension would be sought because, according to the Partnership’s waste data flow figures, there would still be some landfill need at that time.

ES: The existing planning permission for the landfill site expires 2023 (subject to agreement of a s106 notice between Viridor and Sutton which is not yet agreed)

FS: The Household Waste Recycling Centre contract ends in 2022. Currently there are 7 sites across the Plan area. If more than 50% of waste is to be recycled, there could conceivably be a need for 1 or 2 more sites after 2022 (though this hasn’t been considered by the Partnership at this stage). The Partnership’s needs for additional HWRC sites won’t be known until towards the end of the current contracts in 2022
FS: Kitchen & Garden Waste will go to Beddington until 2022 with the possible extension for another 5 years.

ES: The planning application lodged by Viridor for the 30ktpa AD facility at Beddington Farmlands, Sutton seeks permission for a facility only until 2022.

FS: Approx. 15,000t.p.a. of Kitchen and Garden Waste is currently being treated in in-vessel composting tunnels at the Beddington site. Only Kingston & Croydon are currently collecting this waste. A resolution has however recently been passed to grant planning permission, subject to a S106 Agreement, for a 30,000t.p.a. replacement unit. 10,000 tonnes of residual waste is also going to the Lakeside incinerator at Colnbrook, Slough and 35,000 tonnes of dry mixed recyclables to a MRF in Crayford, Kent

FS: Entec are the Partnership’s technical consultants and have not considered the availability of sites. Entec have already undertaken some site studies and confirmed that further studies will be undertaken on air quality, traffic and ecological impact. Details yet to be confirmed. FS confirmed that all Entec studies are available to the Waste Planning group. Steve Blackburn from Entec could provide details of their site assessments.

FS: On the issue of the concept of a ‘centre of gravity’, which some industry representatives have raised, FS considered this may be a logical approach from a transport/environmental impact and costs perspective.
ES explained the reason for the meeting. ES stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings are to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

HS stated that although Site 57 is within MOL it is adjacent to other development and waste uses. At 5 acres it is perfect for the proposed gasification facility for wood waste. MF’s company (Ferncombe Properties) owns a substantial part of Site 57 and such a facility would complement his other business (Cappagh - Constructions Services), which produces wood waste and that of the other occupant of site 57, Sterecycle.

If the site were to be developed, it would complete the line of development on the western side of Beddington Lane and form a neatly aligned boundary to the eastern side of the MOL.

GF pointed out that MF also owns Site 1007 (a go-kart track a short distance to the northwest of Site 57) and that this site could be suitably enhanced to mitigate against any potential impact that the development of Site 57 could have.

JW clarified that LB Sutton have not reassessed Site 57 since the Planning Inspector had expressed his views against the de-designation of Site 57 as MOL. Subsequent to the examination in public the Mayor has expressed his view that the Viridor landfill site (Site 18) should be viewed as a strictly temporary permission. The rehabilitation of the site, as part of the Wandle Valley Country Park, is high on the GLA’s priority.

HS stated that the original design would maintain views through the site, to and from the MOL.
JW clarified that the existing views need to be preserved as much as possible.

GF referred to sustainable development features of the proposals and that its energy generation could link to the surrounding uses. The proposals would result in a net benefit to the area. Would LB Sutton consider a joint site solution, which would include the improvement of Site 1007, resulting in a net benefit to the area?

JW stated that the value of a comprehensive range of waste facilities at this location had been presented to the Planning Inspector and that the potential for the replacement/improvement of the nature conservation value had been pointed out, but the Inspector was not convinced that the need for a strategic waste facility had been made.

ES asked whether alternative uses at the site had been explored.

MF answered that alternative sites had been investigated over that past 7-8 years. A 5-7acre site would be needed but Site 57 is 11acre. There are no good alternative sites available in that location.

GF pointed out that the neighbouring sites could benefit from the heat energy produced by the facility.

HS pointed out that Site 57 does not provide access to any other sites but Site 1007 does provide an opportunity for MOL access. This access way is currently not pedestrian friendly.

GF stated that the go-kart site could be utilised for a more sustainable use with the potential to improve local biodiversity

JW stated that significant nature conservation/habitat improvements would be needed, in order to demonstrate that the loss of /impacts on the existing MOL sites had been addressed.

HS stated that if the biggest hurdle for the GLA is the impact on biodiversity, Sterecycle has done a biodiversity impact assessment and found that although there would be a loss of open space, the land was not of a high bio-diverse value. The design of the buildings could include a green roof.

GF asked whether SLWP officers have identified other sites with co-location benefits.

ES explained that it is the sites identified in the potential sites consultation document, which are the subject of further work currently. ES confirmed that feedback from other operators who have responded to the consultation reveals a preference for larger site sizes,

RC referred to the methodology of the site selection

HS suggested that site locations should be considered in context with the
source of the waste materials

HS confirmed that Site 57 was of an ideal size for the proposed facility.

MF explained that that the existing waste flow for wood waste emanates, typically from site skips, from their riverside Road site and is eventually shipped to Sweden.

HS pointed out that the proposed wood gasification facility would result in a reduction in existing traffic and referred to a comparative modular plant for which a planning application has recently been submitted in Enfield (40-60ktpa).

JW suggested that a joint meeting with the GLA should be held to discuss the potential for the site.

RC sought clarification on whether the MOL matter would be separate from that of the merits of any proposal.

JW stated that the very special circumstances for development on MOL would still need to be proved.

HS provided further details of the scheme currently being considered by Enfield Council (App No. TP/09/1862 – see details and documents on the Council’s website). To complete a similar facility at Site 57 would take approximately 18-24 months (including planning app).

ES enquired about the heat off-take at such a facility.

HS explained that the details of CHP energy could be secured by means of a S106 agreement. The applicants would have to demonstrate that they are making efforts to secure contracts but such a project would require lots of capital. Sterecycle has a co-op agreement with Thames Water for a gasifier to supply 8MW of heating energy. A heat network could be established that would supply the neighbouring industrial area.

GF stated that the gas could also go back into the gas grid

HS stated that the lifespan of such a facility would be 15 years plus, therefore financially viable till the end of the Viridor ‘landfill’ planning permission.

ES enquired if any other waste facilities have been considered.

HS responded that other types of technology have been considered particularly those sources from the existing occupant’s businesses, to fuel. Mixed plastics processing, sourced from Sterecycle, could be treated in a 20-30tpa modular plant, but this would not really be in the current owner’s interest. The GLA have not given their opinion on wood recycling. The existing 5acre site (part of Site 57) would be too small for aggregates. Site 1007 does have some potential for the handling of aggregates.
MF Demolition waste is currently mostly treated on-site. Excavation waste has some potential and the Jessops Way site (Site 1007) would be suitable for aggregates. The view has been that the existing go-kart is a temporary use until a more suitable use can be established.

JW stated that he was not optimistic about the development potential of both sites (57 & 1007). The ‘need’ argument would not suffice for development on MOL, but the replacement/enhanced habitats would only be taken into account if the ‘very special circumstances’, including ‘overriding need’ has been proven. It would be helpful if the proposed technology (wood gasification) has received GLA & Environment Agency approval/support. Any heat output scheme would be an additional benefit.

GF referred SLWP officers to the site criteria criticism that had been submitted as part of the written consultation response.
Notes of ‘Deliverability’ meeting held with

Waste Recycling Group

on 19 May 2010

Attendance:
(PF) Paul Fowler – WRG
(LD) Liz Devlin – RPS Planning
(SC) Steve Cardis – SLWP
(AD) Andy Day – SLWP
(EW) Eben van der Westhuizen – SLWP

Note - sections containing information considered to be prejudicial to commercial interests, will be held in confidence until contract commencement has been reached in South London PFI procurement process.

EW explained the reason for the meeting and stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings is to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

EW asked what evidence, e.g. studies completed, WRG had to support the submission of their preferred sites as deliverable waste sites.

LD explained that financing would not have been secured if the case had not been made that the proposal sites were deliverable. She also referred to all the data in the scoping and screening reports that had been submitted as part of the Invitation to Submit Detailed Solution (ISDS) stage of the PFI bid, and the Entec reports for the S.L.W. Partnership that analysed sites.

LD added that Phase 1 habitat surveys are likely to be carried out in August 2010 with the aim for the submission of planning applications in November. No detailed studies have been done as yet.

PF described the amendments to the PFI timetable (some dates have been set back).

LD clarified that according to the PFI timetable planning applications need to be submitted prior to Final Submissions (by 17 January 2011).

PF described the main features of WRG’s PFI proposal.

EW asked what the merits and limitations of the sites were.

PF pointed out that both sites are unlikely to result in increased impact on local traffic.
LD pointed out that the sites are in close proximity to the waste arisings. The sites would be in accordance with the requirements of London Plan policies.

PF acknowledged that traffic could potentially be a problem at one of the sites but this could be resolved by means of mitigation measures.

SC stated that the visual impact of any new building could also be a potential problem.

EW asked for further clarification regarding the concerns expressed in the consultation response towards the draft policy’s stipulation of the requirement of a BREEAM ‘excellent’ rating.

LD explained that BREEAM is not the most suitable approach to assess the sustainability of the proposed development as it focuses too narrowly on the sustainability features of the actual building. The Sustainability Assessment methodology would be more appropriate but impractical for a development of this size. The environmental sustainability of the proposal should be assessed in its totality (including the wider benefits). The build cost would be raised substantially. The BREEAM ‘excellent’ could result in a significantly greater drain on the bid funding than would be the case for a “very good” rating.

PF added that another reason that it would be hard to achieve the BREEAM rating is because of the typical features of the locations of waste sites.

SC pointed out that the Partnership has their own standards and asked whether these matters have been discussed with the GLA officers.

LD explained that the sustainability features, in the round, have been discussed but not BREEAM ratings. Urban design matters were also discussed. The GLA officers stated that the proposal “looks good”.

AD stated that it would be helpful to know the GLA officers’ opinions on this matter.

LD said that the notes of their meeting with the GLA could be provided to the SLWP.

PF Bidders need to show that the proposals would achieve ‘very good’ rating and provide a shopping list for the features to get to ‘excellent’.

LD reported that TfL had stated that the traffic impact of the proposals at one of the sites would be acceptable as long as the main delivery time did not coincide with the local peak time traffic which is currently at capacity (8am-9am).

EW asked if WRG had investigated other sites or had an interest in merchant waste facilities within the Plan area.
PW confirmed that WRG have no current interest in C&I waste sites.

EW queried whether the location of local utilities could be considered as deliverability constraints.

PW confirmed that they could be viewed as such but their proposals show that these constraints could be overcome.

LD pointed out that the HSE now has a new free consultation service for local authorities.
ES explained the reason for the meeting. ES stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings is to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

ML indicated the exact location of the site (the northern portion of Site 57) and explained that, whilst the S106 Agreement arising from the 1995 planning permission for extraction/landfill tipping had been amended by a Deed Of Variation to enable a new access to be constructed from Beddington Lane, Thames Water has retained the option of constructing an access to this site directly from the Coomber Way roundabout on Beddington Lane, through the original Agreement.

ML described Sterecycle’s proposal for the site:
Access to the site would be taken from a new (Thames Water) access road. Sterecycle now own the freehold to the site.
One of the PFI bidders was interested in the site but that bidder has since dropped out of the list of bidders. The fact that this (MOL) site was considered by a bidder is an indication of the lack of suitable waste sites.
Sterecycle has evaluated all 141 sites originally identified as part of the Waste Plan with regards to availability and opportunities for assembly.
The site had to be strategically located and be at least 1.5ha in size.

ML queried what the site size was based on.
ML clarified that it was based on the landtake tables in the DEFRA’s reports (‘Waste Technology Management Briefs’) published in 2007.
ML continued that the site size criteria reduced the list of sites to 45. These sites were then assessed with regards to the numbers of separate sites the overall site consisted of (2-3), the ownership details (single or multiple), the age of the existing development on the site and other planning related impacts.
One of the sites had consent (Benedict’s Wharf – Mitcham) but as this is an existing waste site the proposal would effectively only be for additional capacity. The results of this analysis show that there are very few suitable sites available and therefore sites that fall outside of designated industrial areas need to be considered.

ES asked whether this evidence had been submitted as part of the Examination in Public for Sutton’s Core Strategy.

ML clarified that it had been submitted – this is summarised in Sterecycle’s Statement of Case to the Examination in Public. He explained that at that time all the major operators in the waste industry were looking for appropriately located large sites as part of the PFI process. Site 57 was considered suitable but designated as MOL. The sequential site analysis data will be submitted with any subsequent planning application.

RM added that the quantitative element (site size - need) of the study is also of importance not only the sequential site testing element study.

ES explained that the landtake table 4A.7 in The London Plan (Feb 2008) is not in the Consultation Draft Replacement Plan (Oct 2009).

RM stated that the 1.5ha (DEFRA) site size had been used to ensure the robustness of the analysis.

JW queried why a 10acre site had to be assembled.

ML clarified that it is the amount of space that Sterecycle would need for a generic 240,000t.p.a facility.

ES asked what the waste sources would be.

ML clarified that the facility is foreseen to be semi-merchant with some C&I and some Municipal waste.

ES enquired of the likely split.

ML clarified that the details have not been finalised but for planning purposes the split would be 50/50 and that all the waste would be sourced locally. A Sterecycle facility could be operational 18 months after planning permission had been granted. The process is modular, with 1, 2 or 3 autoclaves and is driven by the MRF size.

ML then provided a detailed explanation of Sterecycle’s treatment process and end products.

ES queried whether there would be any heat & power offtake.

ML clarified that Thames Water have agreed in principle to take the CHP
ES asked whether Sterecycle had met with the GLA to discuss the matter of the site’s MOL designation.

ML confirmed that they had not as yet but was confident that no alternative substantial sites are available. Furthermore, the site is located on the periphery of the open area to the west and would therefore not harm the form of the County Park, and it has had some developed on it (‘brownfields’). The location of the site, adjacent to a road and other development, would not result in an impact on the openness of the area. The Phase 1 & 2 ecological surveys has demonstrated that at a local level there would be minimal impact, except for the tree sparrows the were found. It is considered that any impacts could be mitigated against.

RM stated that the GLA’s case against the de-designation of MOL has not been proven and Sterecycle has not had a chance to present its case.

JW stated that the ‘goal posts’ have been moved since the Examination in Public. The current considerations as part of the SLWP, which include local impacts such as the ecological impact, will also consider other wider impacts. The Inspector did not consider waste matters but did comment on amending the boundary. His comments do however raise the bar on proving the special circumstances for amending the MOL boundary.

JW asked whether the footprint of the building has taken the MOL designation into account

ML confirmed that approximately 50% of the site will be developed and the rest could contribute to mitigating measures. New habitat creation is also likely to form part of the mitigating measures.

ES asked whether the habitat surveys would be available for SLWP officers.

ML confirmed that they could be.

ES asked whether copies of the reports of the pre-application discussions would be available for SLWP officers.

ML confirmed that they would be.

JW pointed out that Sterecycle could pursue the ‘DC route’ by submitting a planning application rather than waiting to see whether the site would be included in the SLWP.

ML stated that Sterecycle would be prepared to wait for the publication of the Waste Plan, as any planning application on the site would have greater certainty of approval if the site were identified in the Plan.

JW enquired whether a planning application or pre-application discussions
could therefore be expected within the next 12 months.

ML stated that there is no need to wait for the publication of the SLWP with regards to pre-application talks, and referred to the time constraints on ensuring the relevance of the executed ecological surveys. Sterecycle will be meeting with the GLA in the near future.

ES asked whether any traffic assessments have been done.

ML stated that a fairly detailed traffic assessment has been done but at the time the detail of the facilities on the site was not known yet and it was done in conjunction with the proposals on the neighbouring Cappagh site. It identified that some mitigating improvements would have to be done to a nearby junction and some local road improvements.

JW referred to TfL’s current blanket objection to any proposal that would result in an increase in local traffic on the strategic (TfL) road network in the vicinity of Purley Way.

ES enquired about the origin of the C&I waste

ML stated that it would be from within the South London area and from their research he was confident that there would be a sufficient supply.

RM reiterated the point that the proposal would include the benefit of new habitat creation.
ES explained the reason for the meeting. ES stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings is to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

AS explained that Valad acquired the site on a 250-year lease from LB of Sutton approximately 3 to 4 year ago. The site is being developed over two phases of which phase one has been completed. The undeveloped northern part of the site is the land that would be available as a potential waste management site. A 3-year planning permission was granted on 31/03/2008 for this part of the site (A2007/57634) permitting 12,174m² of B1c, B2 or B8 floorspace. The site was acquired before the recent financial slump and its development is dependant on a 1st-come-1st-serve basis.

ES enquired about any recent market interest.

AS reported that occupiers for bespoke premises have approached them. Valad would not undertake a speculative development of the site for letting and sale of units until further progress is made with the first phase. There was one serious waste related enquiry for a merchant facility. It proposed a 6,967m² building for hydro-mechanical separation and anaerobic digestion facilities. The resultant biogas would fuel an energy-from-waste facility. Additionally one of the PFI bidders also expressed an interest but the terms of the proposed agreement was unacceptable for Valad. As stated in the consultation response, the site is available and suitable but not to the exclusion of the potential for the development of the current planning permission. Sites of this size and location characteristics are rare. Kimpton is a major employment site for LB Sutton.

ES enquired how long Valad would keep the site in this undeveloped state.

AS stated that ideally the development should occur a.s.a.p. but Valad would not be prepared to undersell the property. As a well-resourced property investment group Valad would be prepared to wait until a suitable opportunity
arrives. This site has very good potential for a waste facility and many relevant issues/impacts have already been considered as part of the recently approved planning application for an industrial facility.

JW enquired whether both phases are being developed under a single planning permission.

AS clarified that each phase is being developed under a separate planning permission.

JW stated that the extant ‘Phase B’ planning permission had therefore not been implemented yet.

AS indicated on a map the locations of Phases A & B. He acknowledged that it is a sensitive area with nearby housing, which had generated some objections, however the landscaping, which will also function as a visual barrier, is almost complete.

ES enquired if any other recent non-waste related interests had been received.

AS responded that there are interested parties.

ES described the PFI procurement process and asked whether the site had been actively promoted to the waste industry.

AS clarified that the site had been on the open market. If its development potential were solely for waste purposes then they would have actively marketed it for waste.

EW clarified that were this site to be identified as one of the Waste Plan sites, the policies would protect the site for this specific use. Would Valad then still be interested in having this site identified as a suitable site in the Waste Plan?

AS stated that Valad would not want the site exclusively listed for a waste use in the Plan as it would limit its development options. Valad would prefer that the site be included in a list of sites, additional sites to the ‘identified’ sites, but which were also suitable for an alternative waste use.

AS stated that a planning application would be submitted to extend the lifetime of the current permission.
Notes of ‘Deliverability’ meeting held with
Workspace Group
on 27 May 2010

Attendance:
(JS) Jonathan Shelton – Workspace Group
(CE) Ceri Edwards – Rolfe Judd Ltd
(TB) Tara Butler – Merton Council Spatial Planning Manager
(EW) Eben van der Westhuizen – SLWP

Note – a section containing information considered to be prejudicial to commercial interests will be held in confidence until the relocation details with that tenant has been finalised.

EW explained the reason for the meeting. EW stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings is to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

EW asked for any information with regards to the ownership of the Rainbow Industrial Estate.

JS clarified that Workspace has owned the freehold of the site since 1994. The site was one of 11 in a joint venture between two companies – Workspace and Glebe2. 100% of the ownership was transferred to Workspace 12, a subsidiary of the Workspace Group, in September 2009.

EW enquired whether any of the existing tenants had long term leases or agreements that would restrict vacation.

JS clarified that all the existing tenants where on short term leases with easily manageable expiry clauses.

EW asked whether a list of current tenants could be provided to SLWP officers.

JS agreed that it would be possible.

EW enquired whether the recently proposed waste management scheme for the site had evolved or change since the pre-application details submitted.

JS clarified that the scheme has not changed and that it was decided not to submit a planning application until after the Examination in Public of the South London Waste Plan. There is also sufficient flexibility in the current lease agreements. Workspace’s main line of work is in providing business space for SMEs (through REITs); so they would probably look for an experienced waste
management partner to deliver the site with. An agreement has not been reached with a suitable waste operator; the specific technology utilised would be dependent on the waste operator but Workspace would probably look for a partner with experience in advanced thermal technologies as site most suitable for this. Workspace are open to technology that is right for the site and gives a good return in its current industrial use the site shows very little return.

CE pointed out that the site was also suitably located with regards to transport and heat and energy off-take.

EW enquired whether Workspace would still be interested in pursuing a waste proposal on the site even if it was not identified in the Waste Plan.

JS listed some of the existing characteristics of the site such as:
- it obscured form the public realm
- the existing (industrial) uses could have a detrimental impact on the neighbouring residential properties
- it has a constricted singular access point,
- and it has an unusual shape.

As a real estate investment company, Workspace would like to pursue the most viable solution that would also conform to planning guidance. It may be that some other employment uses or mixed-use scheme could be more viable.

JS stated that to the findings of the SLWP findings, Workspace is open to alternative technologies and referred again to the site’s suitable location for a Energy from Waste scheme.

TB referred to the full council resolution passed in July 2009, against waste proposals on the ‘Rainbow Industrial’ site. A copy of the minutes of that meeting was provided and is available via Merton’s website.

JS stated that there appeared to be 3 options ahead as redevelopment for the site purely for industrial purposes would not be viable:
1 – submit a waste application seeking approval via the ‘Development Control route’
2 – do nothing: maintaining the existing uses with some minor investment
3 – submit a ‘viable proposal’ for the redevelopment of the site for industrial purposes (existing use). If some enabling development were allowed there would be potential to increase the numbers of jobs provided on the site. A mixed use scheme with some commercial space and some small industrial units may be more viable. Workspace has much experience in managing estates specialising in SMEs and with creative and cultural uses.

EW asked about the sources of waste for the proposals

JS was confident of the supply of waste for the proposed 100,000t.p.a facility.
ES explained the reason for the meeting. ES stated that all landowners and industry representatives who have responded to South London Waste Plan consultation stages are being approached for meetings. The purpose of the meetings is to assess the deliverability of sites, which are supported by the industry and landowners. The deliverability of sites is a key issue, which the Waste Plan must address.

HC explained that the initial idea to investigate the possibility of a waste facility or more specifically Energy from Waste (EfW) facility at the Wandle Trading Estate (Site 1006), emanated from discussions with Sutton officers. The proposals have always been considered as an EfW with the fuel (waste) being supplied from the local waste managing facility, 777 Recycling Centre (777), in Beddington, and not as a waste treatment facility itself.

CM queried whether the identified site within the Waste DPD would be reserved for EfW facilities.

ES stated that clarification still needs to be gained from the GLA on this matter regarding decentralised energy.

HC stated that they realise the some local objectors might have some concerns with an EfW proposal.

JW stated that a lot of objections were received from local residents and nature conservation groups with regards to this site in response to the Waste Plan’s consultation exercise (Stage 2a) and pointed out that the respondents were considering the site as a waste management facility.

CM pointed out that the consultation document was specifically about waste management facilities.

HC pointed out that one of the merits of the proposal is that the source of the waste/fuel would be from another site approximately 1 mile away from the subject site. Regarding studies undertaken for the site, HC confirmed that Halcrow undertook a flood risk study in 2007. The report however, is not up to
date, as the Sutton’s more recent modelling has not been incorporated. The report would be updated at a later stage, prior to the submission of any planning application. However, CM pointed out that Halcrow has checked the 2007 report’s finding against the more up to date data and are still satisfied with its findings.

HC pointed out that the facilities would be located in the centre of the site, outside the floodplain and stated that he was aware of the flooding concerns and felt confident that any potential impacts could be addressed by mitigation measures.

CM reiterated the points that the facility would not be a ‘waste’ facility and would be outside the floodplain.

ES enquired about the details of the fuel source

HC clarified that waste would not be delivered to the site but a Refuse Derived Fuel in the form of ‘flock’ (fluff) that would come from the treatment of Commercial & Industrial waste. This residual waste, sourced from 777, would otherwise be sent to landfill.

ES enquired whether all the waste would come from 777.

HC confirmed that that would indeed be the case. 777 would like to have a similar EfW treatment facility but there is not sufficient space on their existing site. It is currently costing 777 £20 per tonne to landfill the waste.

ES enquired how far the plans for the EfW facility at the subject site have progressed.

HC clarified that WSP (consulting engineers) have done a traffic impact assessment. A Phase 1 Habitats survey has been carried out – finding no protected species on the site. A utilities search has been carried out. City & Provincial are members of the Hackbridge Development Forum and have carried out some consultation.

CM stated that further technical work is currently being progressed.

HC referred to Sutton’s LDF support for a mixed-use development at the site (40% industrial/employment & 60% residential). He pointed out that the residents of Hackbridge are conscious of sustainable development issues. The subject site could be suitable for a single site CHP solution for Hackbridge for power and heat. A gasification process is currently being investigated. The only emissions would be the exhaust fumes and ash (approx. 2.5% of fuel), which can be re-used.

ES enquired about the throughput amounts

HC clarified that it is foreseen that the facility would have a 100,000 t.p.a. capacity.
ES enquired whether the London Waste and Recycling Board (LWaRB) had been approached for funding.

HC clarified that they have submitted an application to the LWaRB, but no outcome has yet been decided. HC did confirm that the LWaRB supports the technology in principle.

ES enquired about the progress of the pilot project in Wales.

HC clarified that testing should be completed within 12-18 months.

ES enquired as to the offtakes of the heat and power.

HC clarified that the power generated could be supplied to the grid. Inventa are investigating district heat delivery in Hackbridge. There may be many receptors of heat such as the industries in Willow Lane but it is not currently factored in to the proposal. Research & development units for this growth industry could occupy the rest of the site.

EW enquired about the details of the exhaust chimney stack as this might have an impact on neighbouring amenity.

HC clarified that the one stack would be required of approximately 40 m in height, or less. The building would be 16 m high and 15 vehicle deliveries per day is estimated for the 100,000 t.p.a facility.

EW clarified that were this site to be identified as one of the Waste Plan sites, the policies would protect the site for this specific use.

CM stated that if the site were to be identified within the Plan, it would have to be for an EfW facility/use only – not for other types of waste development.

JW pointed out that this site would be unsuitable for many other types of waste uses. The Environmental Health issues regarding the emissions would need to be addressed. The stack height is likely to be a matter of concern as allotments, residential properties and an Area of Special Local Character surround the site. Although the site has existing buildings, because it is being redeveloped, the flood risks need to be considered and the Environment Agency (EA) needs to be consulted. It is also likely that a gasification process is likely to raise local concerns.

HC stated that with regards to emissions; the EA’s comments will be gained as part of the preparation for the submission of a planning application. With regards to flooding; this industrial facility would be considered as ‘less vulnerable’. In accordance with the Core Strategy, some residential accommodation should also be possible to achieve.

JW stated that the redevelopment opportunities suggested ‘residential’ as one option, not just to address the housing target but also to address the southern
part, which could provide new open space. The residential development would in effect fund the landscaping improvements required for the southern part of the site. However this site is an established industrial area.

CM pointed out that if the site were to be identified within the Waste Plan, it could stipulate that is as an EfW site only, due to the flood risks.

ES pointed out that it might be referred to as an 'Area of Opportunity'.

ES enquired whether the existing reports were available for SLWP officers.

HC confirmed that they are.

CM agreed to send them to ES
Dear Jane,

Thank you for your time yesterday. Please see below a summary of our discussion. I'd be grateful if you could let me know whether you have any amends by close of next Friday 18th June, otherwise I'll take these as the agreed notes of our meeting.

As agreed yesterday, I'd also be grateful if you could confirm the following:

- The throughput for the segregated recyclate element (wood, glass, plastics) at Benedict's Wharf operations, since this will count as 'managed waste' in our 'existing capacity' for the South London Waste Plan.

- The proposed timetable for the development of your Weir Road site. I’d also be grateful for a copy of the site plan, details of the proposed capacity of this site and confirmation of the anticipated waste stream (i.e. is it for municipal, commercial and industrial waste, or construction demolition waste etc?)

**Benedict's Wharf site**

You confirmed that SITA is the freeholder of the majority of the site at Benedict's Wharf and that a small parcel of land is in TfL's ownership (which SITA is in negotiations to purchase) and a small parcel of land is owned by Merton Borough Council (which SITA is also in negotiations about entering into a land swap with the Council). You confirmed that further details are available in the current application on this site, currently being processed by Merton Borough Council.

You confirmed that the current activities onsite at Benedict's Wharf comprise a 54ktpa MRF and a transfer station licensed for 329ktpa, though throughput is in the region of 220ktpa (details can be confirmed in the current application). A proportion of the waste received at the waste transfer station is collected as segregated wood, paper and glass.
You confirmed that the application at Benedict's Wharf is for an 80ktpa MRF, an 80ktpa AD facility, a 20ktpa IVC facility and 40ktpa transfer station (some of which is likely to continue to be pre-sorted recyclables which are transferred to reprocessors). You further confirmed that your anticipated construction period to complete the whole site is 4 years.

You confirmed that the GLA is supportive of the Benedict's Wharf application, with only one outstanding issue on the delivery of CHP from the AD facility to be clarified.

You also confirmed that SITA feels this is the optimum configuration for the development of facilities onsite.

**Weir Road site, Wimbledon**
You confirmed that SITA has submitted an application to Merton Council for the development of a MRF on this site and furthermore, that this site is not currently in use. There is one outstanding issue on this application in relation to energy efficiency.

I’d be grateful if you could keep me updated about SITA’s applications both at Weir Road and Benedict's Wharf, so that I can update the South London Waste Plan’s baseline data as necessary. Meanwhile, I look forward to your response on my queries outlined above and please let me know if you have any amends on the above notes from our discussion. Please also don’t hesitate to contact me if you have any queries about the South London Waste Plan.

Many thanks Jane,

Emma Smyth  
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South London Waste Plan  

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