South London Waste Plan

Issues and Options Consultation Document

September 2008
Foreword

There is a general acknowledgement that how society manages its waste needs to change. The traditional way of disposing of waste in landfill is no longer viable. Landfill space is fast running out and local authorities face substantial fines if they do not meet landfill reduction targets. In addition, the emissions of Methane from landfill contribute to the UK’s greenhouse gas emissions, causing climate change.

The Government has acknowledged that climate change is the biggest threat to society. We have to take action now to tackle climate change to minimise damage to the environment, economy and society. With waste collection and disposal accounting for around 3% of the UK’s greenhouse gas emissions, waste management has an important role to play.

We need to make the most of what we’ve already extracted from the planet. Simply disposing of materials and limiting the impacts is no longer a sufficient ambition. Discarding our waste means that raw materials are being harvested across the globe to create new products, whilst a perfectly good resource is buried in the ground. Recycling reduces the need for primary resources and the energy consumption and greenhouse gas emissions associated with this.

There is now a pressing need to develop waste facilities across London to ensure that as much value from our waste is recovered as possible and to encourage the development of a green economy to reprocess this.

A huge challenge lies ahead to find the right solutions. There will be concerns, but also opportunities. Developing local waste management facilities will not only stimulate a local green economy, bringing with it training and employment opportunities, but will also reduce the greenhouse gas emissions associated with transport and so help safeguard the planet for future generations.

Our four boroughs are working together to plan for new waste management facilities and welcome your views.

- Cllr. Jason Perry       Croydon
- Cllr. Richard Chatterjee Croydon
- Cllr. Simon James       Kingston
- Cllr. Richard Hudson    Kingston
- Cllr. Ian Munn          Merton
- Cllr. Richard Chellew   Merton
- Cllr. Richard Bailey    Sutton
- Cllr. Tim Crowley       Sutton
Executive Summary

1 Why plan for waste?
Waste is of increasing concern to our society. We’re producing more every year which is mainly transported outside of London and disposed of to landfill sites. This is clearly not sustainable. Therefore, the European Union, UK Government and The London Mayor have set targets and identified policies to:

→ Minimise the amount waste we produce
→ divert waste from landfill
→ maximise recycling
→ Increase energy recovery from the waste that’s left over

Planning has a role to play by ensuring that adequate provision is made for modern waste management facilities.

2 What is the South London Waste Plan?
In response, a Waste Plan is being prepared by the four boroughs of Croydon, Kingston, Merton and Sutton, known as the South London Waste Plan. This Plan will set out the details of how planning can support the sustainable management of all waste occurring within the Plan’s area (from homes, businesses, industry etc). It will identify land which is suitable for the potential development of new waste management facilities. It will also contain planning policies to ensure that waste is managed sustainably.

3 How can you get involved?
The Plan will be developed over the next two and a half years. Consulting on Issues and Options is the first step and is your opportunity to help shape the development of the Plan. There are further opportunities to have your say over the next two years. At this stage, we’re seeking feedback on what direction the Plan should take for a number of issues which have been identified:

→ Issue 1: The Vision and Objectives
→ Issue 2: How much of our waste should we deal with?
→ Issue 3: Distribution of waste management sites
→ Issue 4: Where should the new facilities go?
→ Issue 5: Should the South London Waste Plan specify what waste development is suitable for each site eventually identified?
→ Issue 6: Implementing the Plan

Sections 2 to 7 of this report set out these issues and options for dealing with them. A number of questions are raised, which we welcome your feedback on by the 31st October 2008. Your feedback will be used to inform the development of the Plan.

A Technical Report accompanies this Consultation Report, providing more detailed background information. To access a copy, please see the details at the end of Section 1.
Table of figures

Figure 1 Fate of municipal waste in South London, compared to London-wide, 2006-7........ 6
Figure 2 Map showing the South London Waste Plan area ............................................. 9
Figure 3 Process to identifying sites ............................................................................. 11
Figure 4 The Waste Hierarchy .................................................................................... 12
Figure 5 Conveyor Belts in operation in a MRF ............................................................ 13
Figure 6 Modern recycling facility ............................................................................. 14
Figure 7 Identifying the Capacity Gap for the Waste Plan area ..................................... 20
Figure 8 The Energy Hierarchy ................................................................................... 26
Figure 9 Broad locations for waste management facilities from the London Plan.......... 31
Figure 10 Broad locations set against the strategic framework ..................................... 32
Figure 11 Broad locations set against the flood risk assessment ................................... 33
Figure 12 Calculating the configuration of facilities needed in future ......................... 45

Table of tables

Table 1 Waste streams which the Waste Plan must address ....................................... 8
Table 2 Timetable for the South London Waste Plan ..................................................... 10
Table 3 Recycling targets by waste stream .................................................................. 13
Table 4 Current and Future waste arisings in the Plan area ......................................... 19
Table 5 Approaches to the distribution of waste management facilities ....................... 24
Table 6 Draft locational criteria for waste management facilities ................................ 29
Table 7 Advantages and disadvantages of specifying technologies .............................. 38
Table 8 Local borough priorities ................................................................................ 44
Table 9 Average throughput and landtake for waste management facilities ............... 45
1 Introduction

1.1 Why do we need to plan for waste facilities in South London1?

1.1.1 As our society has developed and prospered, the amount of waste households, businesses and industry produce has grown with it. Traditionally, this has been buried in the ground. In South London alone, 349,000 tonnes of municipal2 waste went to landfill in 2006/7 and across London as a whole, over 50% of municipal waste was land filled.

Figure 1 Fate of municipal waste in South London, compared to London-wide, 2006-7

![Figure 1 Fate of municipal waste in South London, compared to London-wide, 2006-7](image)

Source: Department for Environment, Food and Rural Affairs (2006/07).

1.1.2 With landfill space running out and increasing concern about environmental impacts of waste and how it’s treated, a change is needed in the way we think about and manage waste.

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1 South London in this context comprises the London boroughs of Croydon, Kingston, Merton and Sutton

2 'Municipal waste' includes household waste, street sweepings, waste collected from municipal parks and gardens. A full description is provided later in the introduction.
1.1.3 There is a recognition that we need to reduce the amount of waste we’re producing and break the link between ever-rising waste production and economic growth. We also need to find more sustainable ways to manage the waste society does produce. Disposing of used plastics, metals, card, paper, organic material etc is now viewed as a waste of resource which could otherwise be recycled and used to manufacture new products, converted to useful compost or used to generate energy. Land filling waste also produces harmful methane emissions which contribute to the UK’s total greenhouse gas emissions.

1.1.4 The Government has acknowledged that climate change is the biggest threat to society. We have to take action now to tackle climate change to minimise damage to the environment, economy and society.

1.1.5 In recognition of this, European, national and regional guidance and legislation now requires local planning authorities to allocate land to new waste management facilities. This will enable waste produced from households, businesses and industry to be managed as close to the source of its production as possible, reducing the greenhouse gas emissions currently associated with transporting waste across the country for treatment.

1.1.6 London currently manages around 60% of its waste within its borders, with the remainder exported outside the capital to be treated. The London Plan sets targets to increase the amount of London’s waste which is managed within the capital:

→ 75% of London’s waste to be managed in London by 2015
→ 85% of London’s waste to be managed in London by 2020

1.1.7 This represents a big change for all London boroughs. The boroughs and the waste management industry now need to respond, by allocating sufficient land to waste management and by building new, local waste management facilities.

1.1.8 It is important to note that all surrounding areas are developing their own Waste Plans. Surrey County Council adopted the Surrey Waste Plan in May 2008. This Plan identifies sites suitable for the development of waste management facilities to manage waste produced in the area. Bromley is working alongside its neighbouring boroughs in the south east of London and Richmond has joined its neighbouring boroughs in the west of London to develop joint Waste Plans. With each Plan area identifying sufficient sites to manage the waste they each produce, the opportunities to rely on neighbouring counties and boroughs to find additional sites to manage waste produced in the South London Waste Plan area are reduced.


4 The London Plan is the over-arching policy framework document for London
It is therefore important that we find sites within the South London Waste Plan area to manage our future waste.

1.2 What is the South London Waste Plan?
1.2.1 To support the development of local waste management facilities, local authorities must now develop a framework for sustainable waste management for all waste produced in an area. This must:

→ Contain policies to govern the management of waste within the Plan’s area;
→ Allocate land to waste management, to enable the future development of waste management facilities, and;
→ Specify how delivery of the Waste Plan will be monitored annually.

1.2.2 All waste produced in an area will be addressed by the Waste Plan. It will not only address household waste, but also a range of other wastes from commercial and industrial activities within an area:

Table 1 Waste streams which the Waste Plan must address

<table>
<thead>
<tr>
<th>Waste stream</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipal</td>
<td>Household waste, street sweepings, waste from municipal parks and gardens and fly tips. Includes paper, card, plastics, cans and food waste.</td>
</tr>
<tr>
<td>Commercial and Industrial Waste</td>
<td>Waste produced by business and industry, such as factories, industrial plants, restaurants and cafes, shops, offices, leisure centres etc. Includes paper, card, glass, plastic, food waste and old equipment.</td>
</tr>
<tr>
<td>Construction, Demolition and Excavation Waste</td>
<td>Waste produced in the construction, maintenance, repair and demolition of roads, buildings and structures. Includes concrete, brick, stone and soil. Can also include metals, plastics, timber and glass.</td>
</tr>
<tr>
<td>Hazardous Waste</td>
<td>Waste that could be harmful to human health or the environment. Includes asbestos, fluorescent light tubes and lead-acid batteries. Can be produced by households, businesses or industry.</td>
</tr>
<tr>
<td>Agricultural Waste</td>
<td>Waste generated on farms or other agricultural premises e.g. market gardens. Includes a range of natural (organic) and non-natural wastes including discarded pesticide containers, plastics, packaging waste and old machinery.</td>
</tr>
</tbody>
</table>

1.2.3 The Waste Plan will form part of each borough’s Local Development Framework (LDF). The LDF is made up of a set of documents which together outline how development and change will be managed in an area. The framework for sustainable waste management can be developed either as a separate ‘Waste Plan’, or contained within other documents.
1.3 Who is preparing the South London Joint Waste Plan?

1.3.1 The four London boroughs of Croydon, Kingston, Sutton and Merton have chosen to prepare a Joint Waste Plan. The sites allocated for waste management and policies developed in the Joint Waste Plan will therefore apply to all four boroughs.

1.3.2 The boroughs already have a track record of successful partnership working, having previously secured joint funding for a number of recycling and composting projects. More recently, the four boroughs have formed the South London Waste Partnership to jointly procure waste treatment and disposal contracts for municipal waste. The joint development of the Waste Plan will therefore build on successful partnerships already in place across the boroughs.

Figure 2 Map showing the South London Waste Plan area

1.4 What are ‘Issues and Options’?

1.4.1 The process of developing the Waste Plan will take approximately another two and a half years. During this time, it will go through a series of developmental stages (see Table 2). At each, we’ll seek feedback from the public and other key consultees, such as the waste management industry, on the emerging Plan, to help guide its development.

1.4.2 ‘Issues and Options’ represents the first formal consultation stage of the Plan’s development. Prior to this, a wide variety of information and data has been gathered, forming an evidence base for the South London Waste Plan. In South London, the evidence base was developed by consultants, Mouchel, who prepared the accompanying Technical Report. A copy of the Technical Report can be obtained using the contact details which appear at the end of Section 1 of this report.
Table 2 Timetable for the South London Waste Plan

<table>
<thead>
<tr>
<th>Plan making stage</th>
<th>Timescale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation of the evidence base and development of Issues and Options</td>
<td>November 07 to September 08</td>
</tr>
<tr>
<td>Consultation on Issues and Options</td>
<td>September to October 2008</td>
</tr>
<tr>
<td>Consultation on the preferred Waste Plan</td>
<td>September to October 2009</td>
</tr>
<tr>
<td>Submission of the Waste Plan to the Secretary of State</td>
<td>June 2010</td>
</tr>
<tr>
<td>Examination by an Independent Inspector, including an Examination in Public</td>
<td>December 2010</td>
</tr>
<tr>
<td>Adoption of the Waste Plan by the four Councils within the Plan’s area</td>
<td>September 2011</td>
</tr>
</tbody>
</table>

1.4.3 During the development of this evidence base, a number of issues and questions have been raised about how this evidence should steer policy development. The issues presented for your comment in this consultation document are:

→ **Issue 1**: The Vision and Objectives of the South London Waste Plan
→ **Issue 2**: How much of our waste should we deal with?
→ **Issue 3**: Distribution of waste management sites
→ **Issue 4**: Where should the new facilities go?
→ **Issue 5**: Should the South London Waste Plan specify what waste development is suitable for each site eventually identified?
→ **Issue 6**: Implementing the Plan

1.4.4 This consultation document raises a number of questions about these issues. **We welcome your feedback on these by 31st October 2008.** The questions either set out realistic choices for dealing with a particular issue, or seek your opinion on the strategic direction and principles for the South London Waste Plan.

1.4.5 Each option will have differing impacts on local communities and the environment. To inform your decision, the fundamental aspects of the evidence base are included within each section of the Plan and the options are discussed. In addition, a Sustainability Appraisal and Habitats Directive Assessment

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5 Government guidance governing the development of Development Plan Documents, including this Waste Plan may change in the autumn 2008. This may affect some stages of the Plan’s development.
Assessment are published alongside this Issues and Options report. The **Sustainability Appraisal** and **Habitats Directive Assessment** are important in setting out the potential environmental, social and economic impacts of the Waste Plan on the local area. These can be obtained using the details which appear at the end of Section 1 of this report.

### 1.5 What happens after Issues and Options?

1.5.1 After the Issues and Options consultation period, the Waste Plan will be further developed in light of feedback received. A *preferred* Waste Plan will emerge, about which we will seek further feedback in about a year’s time.

1.5.2 One of the most important developments between now and consulting on the draft Waste Plan is the identification of specific sites to be allocated for waste management. At the Issues and Options stage, specific sites have *not been identified*. Preferred sites for waste management facilities will be identified when we consult on the *preferred* Waste Plan. The process is summarised below.

1.5.3 After consulting on the draft Waste Plan, it will be developed further in consideration of feedback. The final Waste Plan will then be submitted to the Secretary of State. This submitted Waste Plan will be subject to a formal examination process by an independent Inspector, including an examination in public.

**Figure 3 Process to identifying sites**

- **September – October 2008**
  - Consult on broad locations
  - Make amendments, informed by consultation
  - **Consult on draft locational criteria**
  - Undertake Sustainability Appraisal and Habitats Assessment to assess suitability of sites
  - Apply locational criteria to sites within the broad locations, to test whether any are suitable for waste management

- **September – October 2009**
  - Consult on short list of sites
  - Make amendments, informed by consultation

- **June 2010**
  - Submit Waste Plan to Secretary of State
1.6 How you can get involved

1.6.1 Consultation arrangements for the South London Waste Plan are guided by the requirements of the Town and Country Planning Regulations 2004 and each borough’s Statement of Community Involvement (SCI). The SCI forms part of the Local Development Framework and sets out each Council’s minimum requirements for involving the community in its preparation. For the South London Waste Plan, a programme of public consultation and stakeholder engagement has been developed. The consultation arrangements are common across all boroughs, enabling equal access across all four boroughs to involvement in the Waste Plan’s development.

1.6.2 Communications and consultation arrangements throughout the Waste Plan’s development include a number of awareness raising activities such as articles in Council magazines, press releases, awareness raising at community events, the publication and distribution of information leaflets and discussion with key stakeholders, including the waste management industry. We will also hold a series of public meetings, attend community meetings and distribute consultation material.

1.6.3 Feedback from consultation activities at each stage will help inform the ongoing development of the Waste Plan.

1.7 The strategic framework for sustainable waste management

1.7.1 The South London Waste Plan will be guided by European, National, Regional and local policies. The over-riding framework for sustainable waste management is the waste hierarchy. This is based on the premise that the most desirable option for waste management is to reduce the amount of waste produced in the first instance and to recycle and compost the majority of whatever is produced. The further up the hierarchy waste is treated, the lower the predicted carbon emissions.

Reduce: Reducing the amount of waste produced.

Reuse: The reuse and repair of items, to prolong their life.

Recycling: Recycling involves the recovery of materials for use in other products and includes composting.

Recover: Energy can be recovered from waste by using it as a fuel.

Residual Disposal: Disposal is generally through landfill or incineration.

1.7.2 The Waste Plan’s role is to provide a strategic framework to ensure that when materials are thrown away, they are managed in the best way possible, in
accordance with the waste hierarchy. The Government, regional and local authorities and a wide variety of other stakeholders, including supermarkets and individuals have a key role to play in waste minimisation.

1.7.3 To support the waste hierarchy, recycling targets have been set across all major waste streams, summarised in Table 3. In addition, the Landfill Allowance Trading Scheme (LATS) has been put in place to reduce reliance on landfill. All waste disposal authorities now have targets to reduce the amount of biodegradable waste going to landfill, facing hefty financial penalties if these are not achieved.

Table 3 Recycling targets by waste stream

<table>
<thead>
<tr>
<th>Waste stream</th>
<th>Recycling / Composting target</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipal waste</td>
<td>45% to be recycled or composted by 2015</td>
<td>The London Plan</td>
</tr>
<tr>
<td>Commercial and Industrial waste</td>
<td>70% of this waste stream be recycled / composted by 2020.</td>
<td>The London Plan</td>
</tr>
<tr>
<td>Construction and demolition waste</td>
<td>95% of this will be recycled <em>on-site</em> by 2020 (i.e. recycled where it is produced, therefore needing few specialist facilities.)</td>
<td>The London Plan</td>
</tr>
</tbody>
</table>

1.8 Modern waste management facilities

1.8.1 The waste management industry has responded positively to the waste hierarchy and developed a number of new technologies now widely in operation across Europe to recover the maximum value from waste.

1.8.2 Materials recycling facilities (MRFs) treat mixed dry, recyclable materials. MRFs identify different waste types (paper, cans etc) and mechanically and/or manually sort and segregate them. Materials are bundled and transported to manufacturing facilities, for processing into new products.

1.8.3 Modern composting is covered, takes place in ‘in-vessel’ composting facilities, with well-regulated airflow to reduce odours.

1.8.4 Mechanical Biological Treatment (MBT) separates organic material and dry recyclables from mixed waste, recovering the recyclables for the manufacturing industry and the organic element usually for composting.

1.8.5 Anaerobic Digestion (AD) facilities are a type of composting facility, in the absence of Oxygen. AD facilities produce a biogas by-product that can be used as a fuel source to provide renewable energy.
1.8.3 **Thermal treatment facilities** use high temperatures to break down waste and can produce energy in the form of heat and power. Modern processes including pyrolysis and gasification use less oxygen than traditional mass-burn incineration and emit fewer air emissions. An advantage of some modern facilities is that they can be designed to be modular; they’re made up of small units which can be added or taken away as waste streams or volumes change.

1.8.4 **Modern facilities are very different from the old image of waste facilities.** Often indistinguishable in appearance from other industrial buildings, they **adhere to strict conditions and regulations** imposed by the Environment Agency. Because modern facilities are **tightly controlled** and meet very **high standards**, it enables them to be mixed with other industrial uses.

![Figure 6 Modern recycling facility](image)

1.9 **Summary**

1.9.1 In summary, a significant challenge lies ahead to find the right solutions. There will be concerns, but also opportunities. Allocating land to waste management facilities will not only stimulate a local green economy, bringing with it training and employment opportunities but will also reduce the greenhouse gas emissions associated with transport of waste outside London and so help safeguard the planet for future generations.

1.9.2 The main body of this Report will now present the six main ‘Issues’ identified for the South London Waste Plan. A number of questions have been raised about which we seek your feedback.

1.9.3 **The questions are summarised in a questionnaire at the rear of this document.** Details for how you can get further copies of this Consultation Report and the accompanying Sustainability Appraisal, Habitats Directive Assessment and Technical Report are overleaf.
1.9.4 To find out more, obtain or download copies of the consultation documents and questionnaires, please contact us by:

**Phone:** 020 8547 5375

**Email:** southlondonwasteplan@rbk.kingston.gov.uk

**Web:**
www.croydon.gov.uk/wasteplan
www.kingston.gov.uk/wasteplan
www.merton.gov.uk/wasteplan
www.sutton.gov.uk/wasteplan

**Write:**
The Project Manager
The South London Waste Plan
The Royal Borough of Kingston upon Thames
High Street
Kingston upon Thames
KT1 1EU

1.9.5 During the consultation period from 19th September to 31st October, consultation documents will be available online at the above web addresses and available to view in hard copy at:

→ Council main offices
→ All council libraries
2 Issue One: The Vision and Objectives of the South London Waste Plan

2.1 In the context of the Local Development Framework and its role as a spatial plan, it’s important that the Waste Plan identifies a purpose, conforming with each borough’s Community Strategy, Municipal Waste Management Strategy, LDF and regional and national policy.

2.1.1 Each borough’s emerging Core Strategy (a key document within each borough’s LDF) will contain a Core Waste Policy, which the Waste Plan must conform with. The four boroughs within the Waste Plan area have developed a common Core Policy which appears in each Core Strategy.

2.2 Government guidance, Planning Policy Statement 10: Sustainable Waste Management (PPS10) and The London Plan identify a number of objectives to be included in the Waste Plan. Consideration of these, together with local priorities, has enabled the development of a draft Vision and draft Objectives for the Waste Plan.

Draft vision

2.3 At 2021, the South London Waste Plan area will have enough waste management facilities to meet the needs of our communities, in appropriate locations. Waste will be regarded as a valuable resource, supplying a growing manufacturing-from-waste-industry. Waste minimisation, recycling and composting will be maximised and where waste cannot be recycled or composted, maximum value will be recovered from that residual waste.

Draft objectives

2.4 The South London Waste Plan will:

→ Provide a sustainable framework for the management of all waste streams occurring within the area and one which seeks to maximise the quantity of waste managed within the Plan’s area

→ Promote recycling and composting, in line with the waste hierarchy

→ Identify enough land to enable the development of sufficient new waste management facilities to manage the equivalent tonnage of waste produced within the Plan’s area and safeguard existing sites and maximise the use of these

→ Have waste sites in the best places, using the best technology and ensure that environmental, social and economic benefits are maximised

→ Think of waste as a resource for local manufacturing

→ Involve local communities and other stakeholders in decision making

→ Support the key aims and objectives of the boroughs’ Community Strategies and Municipal Waste Management Strategies

Go to page 44 for a summary of local priorities considered in the development of the Objectives
Q1 Do you agree with the Plan’s draft Vision and Objectives?

Q2 Would you suggest any changes or additions to the Plan’s draft Vision and Objectives?

Answer these questions in the questionnaire at the rear of the document.
3 Issue Two: How much of our waste should we deal with?

3.1 How much waste is South London currently producing?
3.1.1 Roughly 1.1 million tonnes of waste is currently produced annually within the South London Waste Plan area, plus unknown quantities of construction, demolition and excavation waste (expected to be significant) and agricultural wastes (expected to be insignificant). This is summarised in table 4.

3.1.2 Section 2 of the accompanying Technical Report provides detailed information about how much waste South London currently produces, by waste stream.

3.2 How much can we currently manage?
3.3.1 The South London Waste Plan area currently has 14 facilities which manage waste (i.e. sort or treat waste through a process rather than just bundle and transfer the waste onwards). Between them, these 14 sites are licensed to manage just over 745,000 tonnes of waste per year. This is our existing capacity and since the Plan’s area already produces at least approximately 1.1 million tonnes per year, this figure confirms that the majority of waste produced within the South London Waste Plan area is managed outside of the boroughs’ boundaries.

3.3.2 In addition, there is a landfill site in use within the Waste Plan’s area. However, because this manages waste at the bottom of the waste hierarchy, its capacity cannot be included in the calculation of our existing capacity (because we need to plan to manage our future waste further up the waste hierarchy). However, it should be noted that the presence of landfill provides additional flexibility in our waste planning and could be used, for example, to manage inert waste, such as construction, demolition and excavation waste, should this be needed.

3.3.3 Section 3 of the accompanying Technical Report contains detailed information about the Plan area’s existing waste management capacity.

3.3 How much waste will South London produce in future?
3.3.1 Forecasting how much waste will be produced in any given area (arisings) is inherently uncertain because there can be a wide range of factors which influence its production.

3.3.2 Table 4 summarises the waste arisings anticipated in the year 2021 as almost 1.4 million tonnes per year, plus unknown quantities of construction, demolition and excavation waste (expected to be significant), hazardous waste (expected to be low) and agricultural waste (expected to be insignificant). We were not able to forecast these waste streams with any certainty because of the unavailability of data, or in the case of hazardous waste, the erratic nature of the data. Section 2 of the accompanying Technical Report presents detailed waste forecasts.
Currently, across London, construction, demolition and excavation waste accounts for the highest quantities of waste produced in the capital. However, the vast majority of this is recycled on-site using mobile crushers, mainly due to the expense of transporting this heavy waste and its high re-use value. In developing this Waste Plan, we have made an assumption that the Waste Plan area follows the London-wide trend and that significant quantities of construction, demolition and hazardous waste are produced in the Plan’s area, but that the majority of this is recycled onsite. New facilities to manage this waste stream are therefore unlikely to be needed. Similarly, we have made an assumption that the South London Waste Plan area follows the London-wide trend in producing only small quantities of agricultural and hazardous waste. Most hazardous waste is managed in a small number of regional facilities across the UK. Because of the specialist nature of this waste, an assumption has been made that it will continue to be disposed of in this way.

Table 4 Current and Future waste arisings in the Plan area

<table>
<thead>
<tr>
<th>Waste Stream</th>
<th>Current Tonnage</th>
<th>Future tonnage (at 2021)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipal</td>
<td>457,000</td>
<td>620,000</td>
</tr>
<tr>
<td>Commercial and Industrial</td>
<td>624,000</td>
<td>745,000</td>
</tr>
<tr>
<td>Hazardous</td>
<td>16,000</td>
<td>Not identified but likely to be small quantities</td>
</tr>
<tr>
<td>Construction, Demolition and Excavation</td>
<td>Not identified. Likely to be significant with the majority recycled on site.</td>
<td></td>
</tr>
<tr>
<td>Agricultural</td>
<td>Not identified. Likely to be negligible</td>
<td></td>
</tr>
<tr>
<td>Total tonnes</td>
<td>1,097,000</td>
<td>1,365,000</td>
</tr>
</tbody>
</table>

3.4 How much are we required to manage?

3.4.1 As Table 4 shows, we’re expecting almost 1.4 million tonnes of municipal, commercial and industrial waste to be produced in the Waste Plan area, in 2021. However, we are not required to plan sufficient facilities to manage all of this. We are only required to plan for a slightly lower quantity of waste: 1,326,000 tonnes. This is our apportionment.

3.4.2 The apportionment is a quantity (tonnage) of municipal, commercial and industrial waste which The London Plan has allocated to each London borough in 2010, 2015 and 2020. Each borough must plan to manage their allocated quantity of waste. The apportionment was calculated according to each borough’s ability to manage waste and some boroughs were found to have a greater capacity to manage waste than others, (mainly due to the availability of suitable land). Therefore, the apportionment varies across the London boroughs, but combined, enables the Capital to meet London’s target for 85% self-sufficiency in waste management by 2020.
3.4.3 For planning purposes, the apportionments for the four boroughs within the South London Waste Plan area have been combined and an additional apportionment for 2021 has been calculated\(^6\). At 2021, our apportionment represents 97% of the waste we expect in 2021. As Figure 7 shows, the proportion of our own waste which we’re required to manage within the Plan’s area, increases over time. The South London Waste Plan area’s apportionments are:

- \(2010: \) 854,000 tonnes
- \(2015: \) 1,130,000 tonnes
- \(2020: \) 1,332,000 tonnes
- \(2021: \) 1,326,000 tonnes

3.4.4 The gap between how much waste we can currently manage within the Plan’s area (745,000 tonnes per year) and how much we need to manage in future (i.e. either our apportionment, or slightly more than this to manage 100% of municipal, commercial and industrial waste anticipated), is our **Capacity Gap**. This is illustrated in Figure 7.

3.4.5 To meet our 2021 apportionment, almost an **additional 577,000 tonnes of treatment capacity** will need to be planned and licensed by 2021. To become 100% self-sufficient, just over an extra 40,000 tonnes will need to be managed in addition to this.

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\(^6\) It was necessary to calculate a 2021 apportionment for the South London Waste Plan area because the Plan is required to cover a 10-year period from its adoption. The 2021 apportionment is based on London’s continuing 85% self-sufficiency and maintaining the Plan area’s contribution to this. The accompanying Technical Report shows how this was calculated.
3.5 Discussion of Options available for dealing with waste

3.5.1 Having presented the data, this report now highlights the planning options available to South London. For municipal, commercial and industrial wastes, we can seek to either meet the apportionment provided in The London Plan, or plan to manage all of this waste, which is approximately an additional 40,000 tonnes of waste per year at 2021.

3.5.2 It should be noted that the apportionment is the minimum amount of waste required to be managed within the South London Waste Plan area. Government guidance (PPS10) requires boroughs to maximise self-sufficiency and deal with as much of their own waste arisings as possible. Planning for a greater quantity of waste would provide greater flexibility in the Plan, should quantities of waste be greater than anticipated. This is particularly important because, although based on the best data available, waste forecasts are inherently uncertain.

3.5.3 Because the apportionment calculation was based on a number of criteria to determine each borough’s ability to accommodate waste sites, the apportionment may be a sensible quantity of waste to plan for; particularly given other important land use needs, such as housing and employment, within the South London Waste Plan area.

3.5.4 However, it may prove that the South London boroughs are able to accommodate more waste sites than identified to meet the apportionment, and therefore we might manage even more of our own waste and move towards maximising self-sufficiency for the area. Maximising self-sufficiency is also likely to encourage local communities to take a greater responsibility for their own waste, since greater quantities of the waste produced will be managed locally.

3.5.5 Question 3 seeks your views on how self-sufficient the South London Waste Plan area should become, in terms of managing the municipal, commercial and industrial waste produced in the Plan’s area.

Q3 How much municipal, commercial and industrial waste, should the South London Waste Plan plan to manage?:

Options

a. The Waste Plan should allocate sufficient suitable sites for waste management facilities to meet the apportionment in 2021 (the equivalent of 97% of the waste produced in the boroughs at 2021)

b. The Waste Plan should allocate sufficient suitable sites for waste management, to manage 100% in 2021 (note: this represents approximately 40,000 tonnes a year more than option A)

c. I don’t know
3.5.6 Although we haven’t been able to forecast arisings for construction, demolition and excavation waste, hazardous and agricultural wastes, the South London Waste Plan needs to address whether, and how these waste streams will be managed in the Plan’s area.

3.5.7 Questions 4 to 6 seek your views on whether and if so, how the South London Waste Plan area should plan to manage these other waste streams.

Should the South London Waste Plan seek to manage:

- Construction, demolition and excavation wastes?
- Hazardous waste?
- Agricultural waste?

Options

a. Yes, the Plan should make assumptions on arisings and include some extra land allocation to manage this

b. Yes, the Plan should make provision for the sustainable management of this waste stream through policies, not through additional land allocation

c. No, the Plan should assume that disposal of these waste streams in South London follow the national trend and are dealt with elsewhere, therefore needing no additional provision

d. None of the above. Please suggest an alternative option and your reasons for this

Answer these questions in the questionnaire at the rear of the document.
4 Issue Three: The distribution of waste management facilities

4.1 How many facilities will we need and how much land will these take?

4.1.1 How many facilities will be needed to manage our capacity gap will depend on how we decide to manage our waste. What proportion will we recycle? How much will we compost? How much will we treat through other facilities? Targets in Government guidance, The London Plan and the local municipal waste management strategy clearly encourage increasing proportions of waste to be recycled and composted over time.

4.1.2 The London Plan provides some indicative guidance on the configuration of waste management facilities which might be used in future across the Capital to enable recycling targets to be met. The London Plan also identifies how much land these facilities are likely to need. By applying this configuration of indicative facilities to our capacity gap (the quantity of waste we are seeking to manage), we are able to calculate how much land is needed to manage our future waste requirements.

4.1.3 We are likely to need between 15 and 17 hectares of additional land across the South London Waste Plan area to treat our waste at 2021. The accompanying Technical Report provides more information and a summary of the calculation is provided in the rear of this report.

4.2 How should sites be distributed?

4.2.1 In considering the distribution of land suitable for waste management, Government guidance (PPS10) requires planning authorities to consider the following:

→ The onsite management of the waste where it is produced; and,
→ The co-location of complementary facilities together on industrial sites.

4.2.2 From this, a range of distribution models can be identified, from one which manages waste as close as possible to its source (a de-centralised approach), to one which co-locates waste management facilities together (a centralised approach). A clustered approach would be a hybrid of these two. The development of a new distribution pattern assumes that new sites will be needed. Another distribution model could maximise the development opportunities on existing waste management sites. Waste transfer sites in particular could be redeveloped from facilities which bundle waste, ready for treatment elsewhere, to new facilities which actually treat the waste onsite. Table 5 summarises the issues to be considered for each approach.
<table>
<thead>
<tr>
<th>Description</th>
<th>Issues to consider</th>
</tr>
</thead>
<tbody>
<tr>
<td>Centralised approach</td>
<td></td>
</tr>
<tr>
<td>→ smaller number of large waste management sites</td>
<td></td>
</tr>
<tr>
<td>→ Each site manages larger quantities of waste</td>
<td>→ Might take waste from a wider area, resulting in longer travel distances</td>
</tr>
<tr>
<td>→ Concentrated on strategic sites</td>
<td>→ Likely to benefit from economies of scale</td>
</tr>
<tr>
<td>→ Likely to support diverse range of facilities</td>
<td>→ ‘Output’ from one facility could be the ‘input’ to another facility</td>
</tr>
<tr>
<td></td>
<td>→ Might enable ‘linked trips’ (i.e. vehicles collecting more than one waste type could deliver to different facilities on the same site)</td>
</tr>
<tr>
<td></td>
<td>→ Confine benefits and impacts to limited areas</td>
</tr>
<tr>
<td>De-Centralised approach</td>
<td></td>
</tr>
<tr>
<td>→ Larger number of small waste sites</td>
<td>→ Likely to be closer to source of waste, so shorter travel distances</td>
</tr>
<tr>
<td>→ Each site manages smaller quantities of waste</td>
<td>→ But might not provide some treatment types, which would need to travelled to outside area</td>
</tr>
<tr>
<td>→ Dispersed across the area</td>
<td>→ Not likely to benefit from economies of scale</td>
</tr>
<tr>
<td>→ Likely to support only one facility</td>
<td>→ Not likely to import waste from outside the Plan’s area</td>
</tr>
<tr>
<td></td>
<td>→ Distribute benefits and impacts across the Plan’s area</td>
</tr>
<tr>
<td></td>
<td>→ Likely to engender greater awareness amongst local communities about waste, resulting in greater ownership and responsibility for waste produced</td>
</tr>
<tr>
<td></td>
<td>→ Less commercially viable for developers. May result in insufficient facilities being built</td>
</tr>
<tr>
<td>Clustered approach</td>
<td></td>
</tr>
<tr>
<td>→ Medium number of medium ‘cluster’ sites</td>
<td>→ Likely to take waste from a local area</td>
</tr>
<tr>
<td>→ Likely to co-locate perhaps two facilities</td>
<td>→ Likely to be closer to the source of waste</td>
</tr>
<tr>
<td>→ Some dispersal across the area</td>
<td>→ Some distribution of benefits and impacts across the Plan’s area</td>
</tr>
<tr>
<td></td>
<td>→ Not likely to benefit as much as a centralised approach from economies of scale.</td>
</tr>
<tr>
<td>Based on current waste sites</td>
<td></td>
</tr>
<tr>
<td>→ Based on existing, waste management sites which have established waste use, so may be easier to develop.</td>
<td>→ Sites might not be suitable for any additional development</td>
</tr>
<tr>
<td></td>
<td>→ Sites might be in the wrong locations for modern waste management (e.g. not close to sustainable transport, main roads etc)</td>
</tr>
<tr>
<td></td>
<td>→ Sites which are suitable might not provide sufficient facilities to manage our future waste</td>
</tr>
</tbody>
</table>
4.3 Waste as a resource

4.3.1 In considering the distribution of sites, it's important to consider additional benefits which could arise from the co-location of facilities on larger sites. The additional benefits are:

→ ability to support a manufacturing-from-waste industry
→ ability to support generation of renewable energy

4.3.2 Co-locating manufacturing-from-waste industries with waste management processes is desirable, particularly where the ‘output’ of the waste management process provides the ‘input’ for the industrial process. For example recovered paper from a MRF could supply a paper mill, or cleaned, processed and sorted glass (known as cullet) could supply a glass bottle manufacturing plant. Other industrial processes create new products with waste, for example, wood recovery factories process waste wood to create a range of products including chipboard, paper, cardboard and animal bedding. Such facilities could even provide onsite education facilities, creating added value for local communities.

4.3.3 A distribution model which makes an allowance for larger sites could enable this.

4.3.4 Currently, most recyclables are exported outside London and even abroad. Developing a local manufacturing-from-waste industry for these recyclables is key to greater sustainability of manufactured goods. It will cut down on greenhouse gas emissions associated with the transport of materials as well as providing employment opportunities in a growing market.

4.3.5 In the capital, London Remade, is working to develop markets for recycled materials to be manufactured into new products. The organisation is currently working to develop a London ‘Trading Hub’ to co-ordinate the growing quantities of recyclable materials in London. It is through such co-ordination initiatives that sufficient volumes of recyclable materials are amassed to make domestic manufacturing-from-waste industry viable.

4.4 Waste as renewable energy

4.3.6 Larger sites would also better facilitate the generation of the energy needed to fuel waste management and industrial processes, than smaller sites which might not have sufficient space, or sufficient energy requirements to warrant its development.

4.3.7 On-site renewable energy from any source could be considered, including using waste as a source. Until new technologies and markets emerge to recycle more of a greater range of materials, there is likely to be some need to treat waste which cannot currently be recycled or composted. This waste could be used as a fuel to power waste management and industrial processes and a distribution model offering larger sites would facilitate this.
4.3.8 Alongside good building design and efficient use of energy within the building, delivering on-site renewable energy means that no electricity is required to be generated from fossil fuels and is therefore critical in reducing the carbon footprint of a waste management or manufacturing-from-waste facility.

**Figure 8 The Energy Hierarchy**

4.3.9 The following questions seek your views on the distribution of waste management sites within the South London Waste Plan area and whether the Waste Plan should support the co-location of the manufacturing-from-waste and renewable energy facilities with waste management facilities.

**Q7** How should the land allocated to waste management be distributed in the South London Waste Plan?

**Options**

a. The Waste Plan should take a centralised approach.

b. The Waste Plan should take a de-centralised approach.

c. The Waste Plan should take a clustered approach.

d. The Waste Plan should rely on the existing pattern of waste management facilities.

e. None of the above. Please suggest an alternative option and your reasons for this.
<table>
<thead>
<tr>
<th>Q8</th>
<th>Should the South London Waste Plan support the co-location of facilities?</th>
</tr>
</thead>
</table>

**Options**

a. Yes, the Waste Plan should identify policies to support the co-location of:
   - manufacturing-from-waste with waste management facilities
   - renewable energy generation with waste management facilities

b. No, the Waste Plan should not identify policies to support co-location of facilities

Answer this question in the questionnaire at the rear of the document.

Go to page 16 for a reminder of the draft Vision and Objectives.
5  Issue 4: Where should the new facilities go?

5.1  Broad locations

5.1.1. As discussed previously, one of the aims of the Plan is to allocate land to waste management facilities. This section considers where these should be located.

5.1.2. At this early stage, we have not identified specific sites. Instead, we seek feedback on broad locations. These are areas where we’re most likely to find sites suitable for waste management facilities.

5.1.3. The London Plan identifies the following as suitable broad locations for waste management facilities:

- Strategic Industrial Locations
- Local Employment Areas
- Existing waste management sites

5.1.4. These broad locations have been identified across the South London Waste Plan area and are presented in Figure 9. These are not proposed sites for waste management facilities, but are the broad locations where we’re most likely to find suitable sites. Some may be suitable and some will not be suitable.

5.1.5. Questions 11 to 13 at the end of this section seek your views on these broad locations. In considering your views, you may find the strategic framework for South London and flood risk locations presented in figure 10 and 11 useful.

5.2  Criteria for assessing whether sites are suitable

5.2.1. To identify which sites are suitable, the Waste Plan must identify a set of criteria. It’s important to identify the right criteria because these will be applied to the broad locations, to test which are actually suitable for waste management. Agreed criteria will also form a policy for assessing whether sites in future are suitable for waste management facilities.

5.2.2. Government guidance (PPS10) identifies a set of locational criteria. Supporting documentation7, used to inform The London Plan also contains criteria. These have been combined and are presented in Table 6. Together, these criteria address the issues which would normally constrain a planning application for waste treatment facilities. Some criterion may be more important than others and we welcome your feedback on this.

5.2.3. Questions 9 and 10 seek your views on the locational criteria.

---

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Closeness to where waste is produced</td>
<td>Facilities should be close to where waste is produced, to <strong>cut greenhouse gas emissions associated with transporting waste</strong></td>
</tr>
<tr>
<td>2. Closeness to sustainable transport</td>
<td><strong>Sustainable movement of waste</strong> and the products arising from a waste management process should be encouraged</td>
</tr>
<tr>
<td>3. Closeness to the strategic road network</td>
<td>It is likely that some waste management facilities will require transport of waste materials by road. It’s important that they are <strong>located close to the strategic road network</strong>, to minimise impact on local roads</td>
</tr>
<tr>
<td>4. Physical and environmental constraints</td>
<td>There are many physical and environmental issues to consider: <strong>→ Closeness and impact on international, European and nationally important conservation areas</strong> <strong>→ Visual intrusion on nationally important landscapes</strong> <strong>→ Closeness of residential properties, schools, workplaces, recreation areas</strong> etc (known as sensitive receptors) <strong>to potential air emissions, odours, noise, vibrations and traffic</strong> associated with development and the extent to which these can be controlled <strong>→ Impact on historic environment and built heritage</strong> <strong>→ Proximity of vulnerable natural water stores</strong> (surface and ground water) <strong>→ Stability of land</strong></td>
</tr>
<tr>
<td>5. Flood Risk</td>
<td>The risk of flooding for any site</td>
</tr>
<tr>
<td>6. Social impact</td>
<td>The impacts of waste facilities, on the <strong>well-being of local communities</strong> and their environment</td>
</tr>
<tr>
<td>7. Land use</td>
<td>Priority will be given to the <strong>re-use of previously-developed land</strong></td>
</tr>
</tbody>
</table>
Q9  Which criteria should be used to identify sites suitable for waste management facilities?

Options

a. The draft locational criteria in Table 6 are sufficient

b. The draft locational criteria in Table 6 are not sufficient. A more detailed set of criteria needs to be developed for the South London Waste Plan. Please specify any additional criteria you would like included and state your reasons why.

Q10  Of the criteria detailed in Table 6, which are the most important in assessing whether locations are suitable for waste management? Please list the criterion you think are most important and explain your reasons for this choice.

Answer these questions in the questionnaire at the rear of the document.

Go to page 16 for a reminder of the draft Vision and Objectives.
Some will not.

Criteria must be applied. Some will be suitable for waste management sites.

Figure 9 Broad locations for waste management facilities from the London Plan.

Legend

- South London Region boundary
- Borough Outline
- Strategic Industrial Locations
- Local Employment Areas
- Management-Facilities
- Existing Licensed Waste
Figure 10 Broad Locations set against the Strategic Framework

Legend

- Local Employment Areas
- Strategic Industrial Locations
- Existing Licensed Waste Management Facilities
- Special Area of Conservation
- Sites of Special Scientific Interest
- Metropolitan Green Belt
- Metropolitan Open Land
- Strategic Road Network
- Railway Network
- Borough Outline
- South London Region boundary
- Strategic Road Network
- railways
- Borough Outline
- South London Region boundary
- Strategic Road Network
Figure 11: Local Employment Areas and Strategic Industrial Locations.
Key to Figure 9

Broad locations of areas which may be suitable for some form of future waste management facility.

These are sites which the London Plan requires us to assess at this early stage of the South London Waste Plan’s development. These will be tested against a set of criteria for siting waste management facilities (also being consulted on in this document) and examined before selection and identification as potential sites for waste management facilities.

1. St. George’s Industrial Estate
2. Canbury Park
3. Fairfield Industrial Estate and Villiers Road
4. St. John’s Industrial Area
5. Red Lion Road Business Centre
6. Kingston Road and Jubilee Way aggregates depot, Tolworth
7. Chessington Industrial Estate
8. Barwell Business Park
9. Silverglade Business Park
10. Durnsford Road area: Weir Road, Endeavour Way, North Wimbledon and Gresham Way Industrial Areas
11. Gap Road Industrial Area, near Leopold Road
12. Dundonald Road Industrial Area
13. Graham’s Yard industrial site, London Road
14. Nelson Trading Estate
15. Merton Industrial Park
16. Greenlea Park, Prince George’s Road
17. Mitcham Industrial Estate, off Streatham Road
18. Rainbow Park Industrial Estate
20. Waste management site at Boundary Business estate, off Church Road
21. Shannon Corner Retail Park, Wyvern Estate and Burlington Road Industrial Area
22. Morden Road Factory Estate, near Ravensbury park
23. Benedicts Wharf, Hallowfield Way Industrial Estate and Willow lane
24. Waste management site at Station Approach, near Mitcham Junction
25. Garth Road Industrial Estate
26. Wandle Trading Estate
27. Waste management site at Beddington Farmlands
28. Waste management site at Beddington Farmlands
29. Beddington Industrial Area
30. Kimpton Industrial Area
31. Restmore Way, Felnex Trading Estate and Land to the East of London Road adjoining Hackbridge Station
32. Waste management site at Beddington Farmlands
Key to Figure 9

Broad locations of areas which may be suitable for some form of future waste management facility.

33. Oldfields Road Trading Estate
34. St. Andrew’s Road/Plumpton Way Industrial Estate
35. Waste management site at Beddington Farmlands
36. Gander Green Lane and Abbots Road Industrial Area
37. Waste management site at Bishops Place
38. Payne’s Chocolate Works
39. Imperial Way Industrial Estate and Purley Way South
40. Waste management site at Northwood Road
41. Selhurst Rail Depot
42. Thornton Road Employment Area
43. Gloucester Road Employment Area
44. Purley Way North Industrial Area
45. Stubbs Mead, Factory Lane
46. Purley Way North Industrial Area
47. Waste management site at Conduit Lane
48. Selsdon Employment Area
49. Waste management site at Purley Oaks
50. Waste management site at Purley Oaks
51. Waste management site at Fishers Farm
52. Vulcan Way Employment Area
53. Waste management site at Station Approach, Purley Way
54. Waste management site at Pear Tree Farm – licensed and permitted only
55. Coulsdon Industrial Area, Marlpit Lane and Ulleswater Crescent
Q11 Are any of the broad locations identified in Figure 9 particularly suitable, or particularly unsuitable for waste management? Please describe your reasons why.

Q12 Are there any additional locations not identified in Figure 9 you think would be suitable for waste management facilities? Please describe your reasons why.

Q13 Are any of the broad locations identified in Figure 9 particularly suitable for co-locating waste management facilities with manufacturing-from-waste industries and/or facilities which provide renewable energy? Please describe your reasons why.

Answer these questions in the questionnaire at the rear of the document.

Go to page 16 for a reminder of the draft Vision and Objectives.
6 Issue 5: Should the South London Waste Plan specify the waste development suitable for each site?

6.1 What are the issues?
6.1.1 Different waste management facilities will have differing impacts on the surrounding environment and communities. It is therefore likely that some will be more suitable for particular sites than others.

6.1.2 Government guidance (PPS10) advises planning authorities to identify the type or range of facilities suitable for any chosen site. However, in doing so, the guidance also states that we must not stifle innovation. The waste management industry is undergoing a huge period of development, focused on identifying new technologies to maximise recycling and minimise negative impacts. Specifying facilities would limit our ability to take advantage of these new and emerging technologies.

6.1.3 In considering this issue, it is critical that sites remain attractive to developers; if the Waste Plan is too prescriptive, developers may feel too restricted and not able to develop local waste management facilities.

6.1.4 It is important to remember that the Waste Plan will allocate suitable land to waste management. Developers will then apply to build waste management facilities on these sites, which will undergo the rigorous planning application process, including wide and in-depth public consultation.

6.2 Generating renewable energy
6.2.1 Until new technologies and markets emerge to recycle more of a greater range of materials, there is likely to be some need to treat waste which cannot currently be recycled or composted.

6.2.2 Where waste cannot be recycled, The London Plan encourages the production of energy from waste using thermal treatment technologies. Policies particularly favour modern facilities that produce fuels (biofuels and hydrogen) which can be used to power combined heat and power facilities (CHP).

6.2.3 With energy prices rising and security of an affordable, future supply under question, it is increasingly important for the UK to source renewable energy. The Waste Plan could play a role in supporting renewable energy production by identifying sites which are close enough to existing heat and power users and also by encouraging waste management facilities to produce a local, renewable supply of energy wherever possible.

6.2.4 Questions 14 and 15 seek your views on how technologies should be identified in the South London Waste Plan area. Table 7 summarises the issues.
### Q14

**Should the Waste Plan specify what waste development is suitable for each site eventually identified?**

**Options**

- **a.** Don’t allocate any technologies or types of facility to any site
- **b.** Allocate specific technologies to specific sites
- **c.** Allocate a broad type of facility to specific sites i.e., enclosed facilities, open facilities and enclosed facilities with a chimney. Can you suggest any alternative to this broad range?
- **d.** None of the above. Can you suggest any alternative options and your reasons for these?

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<table>
<thead>
<tr>
<th>Advantages of specifying technology at each site</th>
<th>Disadvantages of specifying technology at each site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offers <strong>comfort to local communities</strong> (you know what would be built, if developed)</td>
<td>→ Not being flexible enough is likely to be <strong>too stifling</strong> for industry</td>
</tr>
<tr>
<td>→ Specifying sites which are close enough to CHP infrastructure, could enable delivery of local CHP.</td>
<td>→ <strong>Developers may feel too restricted.</strong> They might not be permitted to build the facility/ies which the market requires</td>
</tr>
<tr>
<td></td>
<td>→ <strong>Developers might not be permitted to build the configuration of facilities needed</strong> to manage all of the waste we produce</td>
</tr>
<tr>
<td></td>
<td>→ <strong>Limit our ability to take advantage of better technologies</strong> of the future</td>
</tr>
<tr>
<td></td>
<td>→ <strong>Sufficient facilities might not be built</strong></td>
</tr>
</tbody>
</table>
Q15 Should the South London Waste Plan support the production of renewable energy from waste management facilities?

Options

a. Yes, the waste plan should identify sites which are close to existing heat and power users.

b. Yes, the Waste Plan should identify policies to support the production of onsite renewable energy.

c. No, the Waste Plan should not identify sites or policies to support the production of onsite renewable energy.

d. None of the above. Can you suggest any alternative options and your reasons for these?

Answer this question in the questionnaire at the rear of the document.
7 Issue 6: Implementing the Plan

7.1 Although boroughs in their role as local planning authorities are responsible for implementing the Plan, other stakeholders also have an important role. As waste collection authorities and as partner boroughs in the South London Waste Partnership the boroughs have a key role to play in delivering the municipal waste element of the Plan and in encouraging waste minimisation and re-use activities. The boroughs also have a role in supporting the sustainable management of commercial and industrial waste through providing advice, or recycling collection services. The waste management industry has a critical role in bringing forward applications and actually building and operating local waste management facilities. Local communities and other stakeholders have an important role in being involved in the planning application process for new facilities.

7.2 To assess how well the Waste Plan is being delivered, it will be monitored each year against a set of criteria and will be reviewed every five years. We must ensure that the Waste Plan is based on reliable data, to ensure that we plan to manage the correct quantities of waste. It is also important to track how close we are to meeting the Waste Plan area’s apportionment.

7.3 In this way, monitoring will enable the Waste Plan to become an evolving document, responding to our local communities’ waste management needs. The draft monitoring indicators identified for the Waste Plan are:
   → Quantity of waste currently managed in the Plan’s area
   → Quantities of all waste streams* produced in the South London Waste Plan area
   → Proportion of all waste streams* that are recycled and composted
   → Forecasts for all waste streams* produced in the Plan’s area
   → The amount of land allocated to waste management still available
   → The length of time each site has remained unused
   → The amount of land not allocated to waste management which has been developed for waste management facilities
   * where data allows

7.4 The monitoring report will be included in each borough’s Annual Monitoring Report (AMR), which forms part of the Local Development Framework (LDF). Questions 16 and 17 seek your views on whether these are suitable monitoring criteria for the South London Waste Plan

Q16 Do you agree with the Plan’s draft monitoring indicators?

Q17 Would you suggest any changes or additions to the draft monitoring indicators?

Answer these questions in the questionnaire at the rear of the document.
8 Summary

8.1 In summary, this document has sought feedback on a number of issues. Your feedback will help steer the development of the Waste Plan. Your feedback will be sought again in a year’s time.

→ **Issue One:** The Vision and Objectives of the South London Waste Plan
→ **Issue Two:** Self sufficiency for the South London Waste Plan area
→ **Issue Three:** Distribution of waste management sites
→ **Issue Four:** Where should the new facilities go?
→ **Issue Five:** Should the South London Waste Plan specify what waste development is suitable for each site eventually identified?
→ **Issue Six:** Implementing the Plan

8.2 In reading and responding to this document, you may feel that there are other issues to consider in developing the Waste Plan. If you feel that anything has been missed, please answer the question below.

Q18 Are they any other issues to consider in developing the Waste Plan?  
If yes, please describe the issue(s) and any options for addressing it.

Answer this question in the questionnaire at the rear of the document.
Section 9: Supporting Information

The following pages contain additional information.

The main report identifies where additional information is contained within this section. It is intended to help inform your response to the questions raised.
Sustainability Appraisal

9.1 There will be a number of choices to be made during the development of the Joint Waste Plan. Each will have varying impacts on local communities and the environment and as such, it is useful to have an objective assessment of these impacts. In recognition of this, and in accordance with the requirements of the planning system, a series of Sustainability Appraisals will be undertaken throughout the Waste Plan’s development.

9.2 The purpose of this is to appraise the social, economic and environmental sustainability of the issues, options and policies identified in the emerging Waste Plan. This will be an ongoing process, with the Sustainability Appraisal being constantly updated as the Waste Plan develops.

9.3 The Sustainability Appraisal is published alongside this Consultation Report and is available from the Project Manager, using the contact details which appear at the end of Section 1 of this report.

Habitats Directive Assessment

9.4 In developing the Waste Plan, we are required to carry out an ‘Appropriate Assessment’ of the Plan for the purposes of the Habitats Directive and Habitats Regulations.

9.5 The purpose of the Appropriate Assessment is to assess the impacts of the Waste Plan against the conservation objectives of conservation sites identified within the Habitats Directive, and to ascertain whether the Plan would adversely affect the integrity of any sites. Sites we are required to examine the Waste Plan’s impact on are special areas of conservation, special protection areas, collectively known as the network ‘Natura 2000’ sites.

9.6 The Appropriate Assessment is published alongside this Consultation Report and is available from the Project Manager, using the contact details which appear at the end of Section 1 of this report.
Supporting technical information

Issue 1: The Vision and Objectives of the South London Waste Plan

9.7 It is important that the Waste Plan supports local communities’ priorities. These can be found in the boroughs’ Community Strategies which have been developed in partnership with local organisations and individuals representing all sectors within each borough. They set out the long term vision, aims, priorities and targets for their area.

9.8 Table 8 summarises the common local priorities of the four boroughs within the South London Waste Plan area, identifying how the Waste Plan might support them.

Table 8 Local borough priorities

<table>
<thead>
<tr>
<th>Priority</th>
<th>How the South London Waste Plan may contribute to this</th>
</tr>
</thead>
<tbody>
<tr>
<td>Creating sustainable communities</td>
<td>The Waste Plan will address the needs of the future and planning policies can drive waste up the waste hierarchy.</td>
</tr>
<tr>
<td>Value for money</td>
<td>Delivering the waste plan jointly will enable developmental work necessary for the Waste Plan to be shared across the boroughs.</td>
</tr>
<tr>
<td>Supporting community involvement</td>
<td>Local communities and other stakeholders play a critical role in informing the development of the Plan and are consulted at key stages of the Plan’s development.</td>
</tr>
<tr>
<td>Customer focus</td>
<td>The emerging Joint Waste DPD will be shaped, in response to feedback from communities at each stage of the Plan’s development.</td>
</tr>
<tr>
<td>A cleaner, greener borough</td>
<td>The Waste Plan has a role to play in:</td>
</tr>
<tr>
<td></td>
<td>→ supporting recycling and composting</td>
</tr>
<tr>
<td></td>
<td>→ supporting local waste management</td>
</tr>
<tr>
<td></td>
<td>→ raising awareness of waste</td>
</tr>
<tr>
<td></td>
<td>→ supporting renewable energy production</td>
</tr>
<tr>
<td></td>
<td>→ supporting local manufacturing-from-waste</td>
</tr>
</tbody>
</table>

9.9 In addition, it is important to acknowledge that the South London Waste Plan must deliver appropriate sites without compromising the ability of boroughs’ to meet other priorities, including:

→ achieving better outcomes for children and young people
→ Helping to create safer and inclusive communities
→ Encouraging enterprise and employment
→ Improving housing
→ Improving health and well-being
Issue 3: Distribution of waste management facilities

Calculating how much land will be needed to meet our future waste management needs

9.10 By applying The London Plan’s guidance on the types of facilities which are anticipated to be used to treat waste in future, across London as a whole, we can identify the configuration of facilities which are likely to be needed to manage our future waste in the Plan’s area.

Figure 12 Calculating the configuration of facilities needed in future

9.11 The London Plan also provides details of the average throughput (i.e. the quantity of waste which can be dealt with per year) and land needed for each type of facility.

Table 9 Average throughput and landtake for waste management facilities

<table>
<thead>
<tr>
<th>Facility</th>
<th>Average throughput per year</th>
<th>Average land take per facility (hectares)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials Recycling Facility (MRF)</td>
<td>42000</td>
<td>0.9</td>
</tr>
<tr>
<td>Composting</td>
<td>19000</td>
<td>1.25</td>
</tr>
<tr>
<td>Mechanical Biological Treatment</td>
<td>125000</td>
<td>1.75</td>
</tr>
<tr>
<td>Anaerobic Digestion</td>
<td>15000</td>
<td>1</td>
</tr>
<tr>
<td>Modern thermal treatment</td>
<td>114000</td>
<td>2.25</td>
</tr>
</tbody>
</table>

Source: The London Plan

9.12 Applying the configuration of facilities and their average land take to our capacity gap results, we have calculated that 15 hectares are likely to be needed to meet the apportionment in the Plan area in 2021 and 17 hectares will be needed to meet 100% of municipal, commercial and industrial waste arisings in the Plan area.
10 Questionnaire

Please complete the following questionnaire, tear off and return to the freepost address at the end of this questionnaire. You can also provide your feedback online at:

→ www.croydon.gov.uk/wasteplan
→ www.kingston.gov.uk/wasteplan
→ www.merton.gov.uk/wasteplan
→ www.sutton.gov.uk/wasteplan

Issue One: Developing a Vision and Objectives for the South London Waste Plan

Q1 Do you agree with the Plan’s Vision and Objectives? Please tick which option you agree with

Yes ☐  No ☐

Q2 Would you suggest any changes or additions to the Plan’s Vision and Objectives? Please tick which option you agree with

Yes ☐  Please describe: .................................................................

..........................................................................................

..........................................................................................

..........................................................................................

No ☐

Issue Two: Self Sufficiency for South London

Q3 How much municipal, commercial and industrial waste, should the South London Waste Plan plan to manage?:

Options Please tick which option you agree with

a. ☐ The Waste Plan should allocate sufficient suitable sites for waste management facilities to meet the apportionment in 2021 (the equivalent of 97% of the waste produced in the boroughs at 2021)

b. ☐ The South London Waste Plan should allocate sufficient suitable sites for waste management, to manage 100% in 2021. (Note: this represents approximately 40,000 tonnes a year more than option A)
Q4 Should the South London Waste Plan seek to manage construction, demolition and excavation wastes?

Options Please tick which option you agree with

a. □ Yes, the Plan should make assumptions on arisings and include some extra land allocation to manage this

b. □ Yes, the Plan should make provision for the sustainable management of this waste stream through policies, not through additional land allocation

c. □ No, the Plan should assume that disposal of construction, demolition and excavation wastes in South London follows the national trend and are mostly recycled onsite and therefore needs no additional provision

d. □ None of the above. Please suggest an alternative option and your reasons for this

Q5 Should the South London Waste Plan seek to manage hazardous waste?

Options Please tick which option you agree with

a. □ Yes, the Plan should make assumptions on arisings and include some extra land allocation to manage this

b. □ Yes, the Plan should make provision for the sustainable management of this waste stream through policies, not through additional land allocation

c. □ No, the Plan should assume that hazardous waste will continue to be mainly managed elsewhere in specialist, regional facilities and make no provision for additional treatment in South London

d. □ None of the above. Please suggest an alternative option and your reasons for this
Q6 Should the South London Waste Plan seek to manage agricultural waste?

**Options** Please tick which option you agree with

a. □ Yes, the Plan should make assumptions on arisings and include some extra capacity provision to manage this.

b. □ Yes, the Plan should make provision for the sustainable management of this waste stream through policies, not through additional land allocation.

c. □ No, the Plan should not make any provision for agricultural waste.

d. □ None of the above. Can you suggest any alternative options and your reasons for these?

Issue 3: The distribution of waste management facilities

Q7 How should the land allocated to waste management be distributed in South London?

**Options** Please tick which option you agree with

a. □ The Waste Plan should take a centralised approach.

b. □ The Waste Plan should take a de-centralised approach.

c. □ The Waste Plan should take a clustered approach

d. □ The Waste Plan should rely on the existing pattern of waste management facilities

Q8 Should the South London Waste Plan support the co-location of facilities?

**Options** Please tick all that apply

a. □ Yes, the Waste Plan should identify policies to support the co-location of:
   ai) manufacturing-from-waste with waste management facilities
   aii) renewable energy generation with waste management facilities

b. □ No, the Waste Plan should not identify policies to support co-location of facilities
**Issue 4: Where should the new facilities go?**

Q9 Which criteria should be used to identify sites suitable for waste management facilities?

**Options** Please tick which option you agree with

a. [ ] The draft locational criteria in Table 6 are sufficient

b. [ ] The draft locational criteria in Table 6 are not sufficient. A more detailed set of criteria needs to be developed for South London. Please specify any additional criteria you would like included and state your reasons why.

Q10 Of the criteria detailed in Table 6 of the Issues and Options consultation report, which do you think are the most important in assessing whether locations are suitable for waste management? Please list three criterion you think are most important and explain your reasons for this choice.

1. The most important criterion is.................................................................
   This is because...........................................................................................

2. The second most important criterion is....................................................
   This is because...........................................................................................

3. The third most important criterion is....................................................
   This is because...........................................................................................

Q11 Are any of the broad locations identified in Figure 9 of the Issues and Options Consultation Report particularly suitable, or particularly unsuitable in your opinion for waste management facilities? Please describe your reasons why.

Q12 Are there any other locations, not identified in Figure 9 of the Issues and Options consultation report that you think would be suitable for waste management facilities? Please describe your reasons why.
Q13 Are any of the broad locations identified in Figure 9 of the Issues and Options Consultation Report particularly suitable for co-locating waste management facilities with manufacturing-from-waste industries and/or facilities which provide renewable energy? Please describe your reasons why.

Issue 5: Should the South London Waste Plan specify the waste technology to be used at each site?

Q14 Should the Waste Plan specify what waste development is suitable for each site eventually identified?

Options Please tick which option you agree with

a. Don’t allocate any technologies or types of facility to any sites

b. Allocate specific technologies to specific sites

c. Allocate a broad type of facility to specific sites i.e. open, enclosed or with a chimney

d. None of the above. Can you suggest any alternative options and your reasons for these?

Q15 Should the South London Waste Plan support the production of renewable energy from waste management facilities?

Options Please tick all that apply

a. Yes, the waste plan should identify sites which are close to existing energy infrastructure.

b. Yes, the Waste Plan should identify policies to support the production of onsite renewable energy.

c. No, the Waste Plan should not identify sites or policies to support the production of onsite renewable energy.

d. None of the above. Can you suggest any alternative options and your reasons for these?
**Issue 6: Implementing the Plan**

**Q16** Do you agree with the Plan's draft monitoring indicators? Please tick which option you agree with

Yes [ ] No [ ]

**Q17** Would you suggest any changes or additions to the draft monitoring indicators?

Yes [ ] Please describe: __________________________________________________________

______________________________________________________________________________

______________________________________________________________________________

No [ ]

**Summary**

**Q18** Are they any other issues to consider in developing the Waste Plan?

If yes, please describe the issue(s) and any options for addressing it.

______________________________________________________________________________

______________________________________________________________________________

______________________________________________________________________________

______________________________________________________________________________

Thank you for completing this questionnaire.
It would be helpful if you would provide the following details:
Your name: ________________________________________________________________

Name of company / group / organisation you represent (if any): ______________________

Contact address: ____________________________________________________________

Contact telephone: __________________________________________________________

Contact Email address: ________________________________________________________

→ We will use your details to contact you when we consult further on the development of the South London Waste Plan

→ If you do not wish to be contacted about future consultations on the development of the South London Waste Plan, please tick this box. [ ]

**Please return to:** The South London Waste Plan, Planning Policy Team, Royal Borough of Kingston Upon Thames, FREEPOST KT644, Kingston Upon Thames, Surrey, KT1 1BR
11 Glossary

Apportionment See London Plan Apportionment.

Biodegradable Biodegradable materials are generally organic, such as plant and animal matter and other substances originating from living organisms. They can be chemically broken down by naturally occurring micro-organisms into simpler compounds. Waste which contains organic material can decompose producing bio-gas, leachate and other by-products.

Biodegradable Municipal Waste (BMW) Waste that is capable of undergoing natural decomposition such as paper and cardboard, garden and food waste from municipal waste services.

Climate Change Regional or global-scale changes in historical climate patterns arising from natural and/or man-made causes that produce an increasing mean global surface temperature.

Composting A biological process which takes place in the presence of oxygen (aerobic) in which organic wastes, such as garden and kitchen waste are converted into a stable granular material. This can be applied to land to improve soil structure and enrich the nutrient content of the soil.

Department for the Environment Food and Rural Affairs (DEFRA) Government department with national responsibility for sustainable waste management

Energy Recovery The combustion of waste under controlled conditions in which the heat released is recovered to provide hot water and steam (usually) for electricity generation (see also Recovery).

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

Greater London Authority (GLA) The GLA is a unique form of strategic citywide government for London. It is made up of a directly elected Mayor – the Mayor of London - and a separately elected Assembly – the London Assembly.

Green Belt A planning designation aimed at preventing urban sprawl and encroachment into the countryside.

Incineration The burning of waste at high temperatures in the presence of sufficient air to achieve complete combustion, either to reduce its volume (in the case of municipal solid waste) or its toxicity (such as for organic solvents). Municipal solid waste incinerators recover power and/or heat.

Landfill The deposit of waste onto and into land, in such a way that pollution or harm to the environment is prevented and, through restoration, to provide land which may be used for another purpose.

Landfill Allowance Trading Scheme (LATS) Process of apportionment, by waste disposal authority, of the tonnage of biodegradable municipal waste that may be disposed of to landfill to meet EU Landfill Directive targets.
London Plan This document was produced by the Mayor of London to provide a strategic framework for the boroughs' Unitary Development Plans. It will now perform this function in respect of Local Development Frameworks. It was first published in February 2004 and alterations have since been published in September 2006 and 2007. It has recently been published in February 2008 incorporating all alterations since 2004. It has the status of a development plan under the Planning & Compulsory Purchase Act.

London Plan Apportionment Allocates to each individual borough a given proportion of London’s total waste (expressed in tonnes) for which sufficient sites for managing and processing waste must be identified within their Local Development Frameworks.

Planning Policy Statement 10 (PPS10) Guidance documents relating to ‘Planning for Sustainable Waste Management’ which set out a number of key concepts which should be considered and statutory requirements of local and regional planning policy documents.

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

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

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

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

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

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

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