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, Methane emissions from landfill add to the UK’s greenhouse gas emissions, contributing to climate change.

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 green house gas emissions associated with this.

There is now a pressing need to develop waste facilities across all parts of the UK to ensure that as much value as possible is recovered from our waste 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, it will also reduce the greenhouse gas emissions associated with transporting waste to landfill 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.

Following last year’s consultation, potential future sites for waste management facilities have been identified and policies governing their development have been drafted. Further investigation and your feedback is now needed before the final selection is made. Please give your views on the potential sites and policies in this document using the questionnaire at the rear of this document.

Please ensure your responses are received by the 16th October 2009. We cannot guarantee late responses will be considered in the development of the Waste Plan.

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

Table 1.1: Timetable for the South London Waste Plan .................................................. 8
Table 1.2: Recycling targets by waste stream ................................................................. 10
Table 1.3: Description of modern waste facilities and typical land takes ....................... 13
Table 2.1: Additional sites identified through the Issues and Options Consultation .......... 16
Table 2.2: Existing waste sites considered to have potential for re-development as waste management facilities .......................................................... 22
Table 2.3: Existing waste sites with possible delivery constraints ............................... 25
Table 2.4: Top scoring new sites with opportunity for developing waste management facilities .......................................................... 26
Table 2.5: Top scoring new sites with possible deliverability constraints ................. 30
Table 2.6: Industrial estates which generally score well and are expected to have some deliverable areas .......................................................... 34
Table 3.1: Proposed Vision and Objectives for the South London Waste Plan .............. 38
Table 3.2: UDP policies which are to be superseded by policies of the South London Waste Plan .......................................................... 39
Table 3.3: Proposed supporting text to Policy WP1: The Strategic Approach .............. 40
Table 3.4: Additional waste management capacity and landtake required, throughout the plan period for commercial, industrial and municipal waste .......................................................... 41
Table 3.5: Proposed Policy WP1: The Strategic Approach ............................................ 43
Table 3.6: Proposed supporting text to Policy WP2: Sustainable waste management ........ 44
Table 3.7: Proposed Policy WP2: Waste Minimisation ................................................. 44
Table 3.8: Proposed supporting text to Policy WP3: Existing waste management sites ........ 45
Table 3.9: Proposed Policy WP3: Existing waste management sites .......................... 45
Table 3.10: Proposed supporting text to Policy WP4: Proposed sites for new/enhanced waste management facilities .......................................................... 46
Table 3.11: Proposed Policy WP4: Proposed sites for new/enhanced waste management facilities .......................................................... 47
Table 3.12: Proposed supporting text to Proposed Policy WP5: Waste related development on unallocated sites .......................................................... 47
Table 3.13: Proposed Policy WP5: Waste related development on unallocated sites ........ 48
Table 3.14: Proposed Supportive text to Policy WP6: Development Criteria .................. 49
Table 3.15: Proposed Policy WP6: Development Criteria ........................................... 50
Table 3.16: Proposed Supportive text to Policy WP7: Sustainable, modern energy recovery .......................................................... 51
Table 3.17: Proposed Policy WP7: Sustainable, modern energy recovery ................. 51
Table 3.18: Proposed monitoring regime for Proposed Policy WP1: The Strategic Approach .......................................................... 52
Table 3.19: Proposed monitoring regime for Proposed Policy WP2: Waste minimisation .......................................................... 54
Table 3.20: Proposed monitoring regime for Proposed Policy WP3: Existing waste management sites and Proposed Policy WP4: Proposed site for new / enhanced waste management facilities .......................................................... 55
Table 3.21: Proposed monitoring regime for Proposed Policy WP5: Waste related development on unallocated sites .......................................................... 56
Table 3.22: Proposed monitoring regime for Proposed Policy WP6: Development Criteria .......................................................... 56
Table 3.23: Proposed monitoring regime for Proposed Policy WP7: Sustainable, modern energy recovery .......................................................... 58
Section 1: Background Information

Introduction

1.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton are working together to prepare a Joint Waste Development Plan Document, known as the South London Waste Plan.

1.2 The Waste Plan will form part of each borough's Local Development Framework (LDF). A borough's LDF comprises a number of documents which together outline how development and change will be managed in an area. The framework for sustainable waste management will be addressed in the South London Waste Plan and will initially cover a period of 10 years.

1.3 The South London Waste Plan will provide a planning framework for the management of all waste produced in the partner boroughs. It must deal with waste from households, businesses and industry. It will:
   - Contain policies which will be used to assess applications for future waste management facilities within the Plan's area;
   - Allocate land to waste management, to guide the future development of waste management facilities, and;
   - Specify how delivery of the Waste Plan will be monitored annually.

1.4 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.


Figure 1.1: Map showing the South London Waste Plan area

Preparation of the South London Waste Plan

1.5 The South London Waste Plan is being prepared in accordance with national planning policy and each partner borough's Statement of Community Involvement and Local Development Scheme (LDS). Each borough's LDS sets out the timetable reflecting the development stages of the Plan which is identified in Table 1.1 of this document.
**Relationship with the Core Strategies**

1.6 The Core Strategy is considered to be the key plan within a borough's LDF. Each borough produces its own individual Core Strategy which reflects the vision of that borough's Community Strategy as well as the regional strategy (in London, this is the Mayor's London Plan).

1.7 All other plans within the LDF (including the South London Waste Plan) need to be consistent with boroughs' Core Strategies. Initial national planning guidance on the development of LDFs gave boroughs freedom to choose which plans to progress first. As a result, some boroughs have progressed other plans before their Core Strategies, e.g. Kingston's Town Centre Area Action Plan.

1.8 The South London Waste Plan is therefore being prepared either alongside or in advance of some partner boroughs' Core Strategies.

1.9 In developing the South London Waste Plan, care has been taken to ensure the emerging Waste Plan supports emerging Core Strategies. For example, all boroughs have agreed a common Waste Policy for insertion in Core Strategies which feeds into the Vision and Objectives of the South London Waste Plan. The Vision and Objectives of the South London Waste Plan also reflect each borough's Community Strategies and The London Plan policies around sustainable waste management.

1.10 By being in conformity with the boroughs' Community Strategies, the Mayor's London Plan and emerging Core Strategies, we will ensure the South London Waste Plan is supportive of the vision and objectives of borough's Core Strategies.

*Figure 1.2: Relationship between regional and local plans*

Previous consultation on the South London Waste Plan

1.11 Initial consultation on the development of the Plan has already taken place. Known as the 'Issues and Options' consultation, this took place over six weeks in September and October 2008. A summary of the previous consultation response is available online at http://southlondonwasteplan.limehouse.co.uk.

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2 A Community Strategy is produced with key local partners and sets out the strategic vision for a place.
3 Planning Policy Statement 12: Local Development Frameworks 2004 published by the Office of the Deputy Prime Minister
1.12 At that time, the broad areas of search for sites were defined as existing waste sites and industrial areas identified in the boroughs' Unitary Development Plans. This is in line with the Mayor's London Plan. A number of additional sites were also suggested by stakeholders during the consultation.

1.13 During the 'Issues and Options' consultation, feedback was also sought on the issues which need consideration when assessing a site's suitability to be developed for a waste management facility. Feedback from the consultation, together with requirements from national and regional policy\(^4\) and the conclusions from the Interim Sustainability Appraisal Report\(^5\) have formed a long list of criteria against which each site within the area of search has been assessed. Criteria include likely impact of development on amenity, proximity to the strategic road network, proximity to nature conservation areas, proximity to residents and many more factors.

**This consultation**

1.14 Building on this previous work, we have now:
- Developed an emerging preferred strategy;
- Identified potential sites to meet the Plan area's strategic waste management needs, and;
- Identified proposed policies which will be used to guide the development of new and/or enhanced waste management facilities.

1.15 We now seek your views on this emerging preferred strategy.

**Next steps**

1.16 Responses to this emerging preferred strategy will be considered alongside a range of other emerging evidence including feedback from site owners and occupiers on the deliverability of the identified sites and the conclusions from the next iterations of the Habitats Directive Assessment and final Sustainability Appraisal.

1.17 The remaining steps to the development of the South London Waste Plan are identified in Table 1.1.

**Table 1.1: 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><strong>Consultation on the emerging preferred strategy, potential sites and policies</strong></td>
<td><strong>July to early October 2009</strong></td>
</tr>
<tr>
<td>Publication of the Waste Plan</td>
<td>February 2010</td>
</tr>
<tr>
<td>Submission of the Waste Plan to the Secretary of State</td>
<td>July 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>

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4. Planning Policy Statement 10 (PPS10) on Sustainable Waste Management contains national policy governing the development of Waste Plans. The London Plan also contains a number of regional waste policies which guide the development of the Joint Waste DPD.

5. The Interim Sustainability Appraisal report was published alongside the 'Issues and Options' consultation report in September 2008. All background reports are available online via http://southlondonwasteplan.limehouse.co.uk
When will we know what is going to be built?

1.18 It is important to note that the South London Waste Plan is a strategic plan. It will set out the principles for assessing planning applications. The plan will guide where development of waste management facilities will take place, it will set out the desired outcomes of development (e.g. no significant negative impacts for local communities or the environment, high quality design etc) and provide criteria for assessing planning applications.

1.19 Any developer wishing to build a waste management facility will be required to submit a planning application supported by sufficient information to allow a decision to be taken. This will contain details such as the type of technology, the waste to be treated, the design of the building, and potential traffic and environmental impacts. All planning applications will be the subject of full and comprehensive public consultation. The Mayor’s London Plan (Table 4A.7) indicates that most of the new facilities likely to be needed in London will be for recycling and composting.

Why won’t the South London Waste Plan specify what’s going to be built?

1.20 The South London Waste Plan will initially cover a 10 year period, from 2011 to 2021 in line with national planning guidance6. Over this period, the quantities of waste generated in the Plan area will change. Population is forecast to grow but changing consumer habits, changes to the packaging of goods and improved collections for recyclables will all impact on the quantities and types of waste produced in the Plan area and consequently what waste management facilities are needed to treat it. It is therefore not appropriate for the strategic South London Waste Plan to identify specific technologies to be built on each site because our needs will change over time and technologies will change over time.

1.21 Instead, the Waste Plan will define the outcomes and parameters for development e.g. reduced carbon impact for the waste it will treat, high quality building design, no significant impacts on people or the local environment etc. This ‘output’ based approach is also in conformity with the South London Waste Partnership’s procurement which is technology neutral and output focused. Furthermore, this approach is in conformity with the emerging direction of travel for the Mayor’s London Plan which states that, “rather than focusing on particular waste treatment technologies, the Mayor will consider environmental outcomes for London [and] shift towards output-based specification to ensure the best possible environmental outcomes.”7

1.22 The details of technology types and facilities will be considered and assessed at the planning application stage. As stated previously, all planning applications will be the subject of full and comprehensive public consultation.

Planning applications for waste facilities

1.23 Planning applications for waste management facilities are not required to wait until this Waste Plan is adopted. Waste management facilities are needed to reduce the amount of waste disposed of in landfill and support recycling and composting of waste.

1.24 Applications received before the Plan is adopted will be assessed against the Mayor’s London Plan, any policies remaining in boroughs’ Unitary Development Plans, other Local Development Framework

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6  PPS10: Sustainable Waste Management
documents which have been adopted (or made significant progress towards adoption) together with national guidance and relevant Supplementary Planning Guidance and Supplementary Planning Documents. As the South London Waste Plan is developed and consulted on, the emerging policies will also become a greater consideration in assessing planning applications.

1.25 At the time of writing, a number of sites referred to in this document already have planning applications lodged with the relevant boroughs for waste management facilities.

1.26 It is difficult to disassociate existing applications from the process of developing the South London Waste Plan. However this document does not seek your feedback on specific applications for waste management facilities. Rather, this document seeks views on the general suitability of a number of sites for waste management facilities and the policies against which applications will be eventually assessed.

The need for change

1.27 The key objectives for the future management of society’s waste are:

- Moving away from landfill, towards more sustainable waste management methods, and;
- Breaking the link between economic growth and rising waste production

1.28 burying our waste in the ground in landfill sites is no longer sustainable. This practice not only wastes resources which could be recycled; the breakdown of waste in a landfill also releases the powerful greenhouse methane, which, if not properly managed, contributes to climate change.

1.29 Within the South London Waste Plan area\(^8\), roughly 1.1 million tonnes of waste is produced each year. Over 600,000 tonnes per year is produced by local businesses and industry and over 400,000 tonnes is collected as municipal waste by local authorities\(^9\). In 2007-08, 74% of this municipal waste was buried in landfill and 26% was recycled or composted. Around 60% of the waste generated from our local businesses and industry is also landfilled.

1.30 In acknowledgement of the environmental impact of landfilling waste, European, national and regional legislation and policies require local authorities, business and industry to increase the amount of waste recycled and composted and reduce the amount of waste sent to landfill. This is supported by escalating costs for disposing of waste to landfill and the risk of fines and an increasing burden on local taxpayers if local authorities don't meet challenging landfill reduction targets. Landfill is no longer a financially viable option. Table 1.2 identifies current recycling targets for various waste streams.

### Table 1.2: 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% by 2015</td>
<td>The Mayor’s 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 Mayor’s London Plan</td>
</tr>
<tr>
<td>Construction and demolition waste</td>
<td>95% of this will be recycled on-site by 2020 (i.e. recycled where it is produced, therefore needing few specialist facilities.</td>
<td>The Mayor’s London Plan</td>
</tr>
</tbody>
</table>

1.31 To facilitate the move away from landfill, the cost of disposing of waste to landfill is rising year on year and local authorities face substantial fines if they do not meet landfill diversion targets. Landfilling the majority of waste is no longer an environmental or financially viable option.

1.32 The development of clean, modern, hi-tech waste management facilities is necessary infrastructure in today’s society to deliver reductions in landfill and increases in recycling / composting.

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\(^8\) In this context, ‘South London’ refers to the boroughs of Croydon, Kingston, Merton and Sutton; the partner boroughs who are working jointly to develop the South London Waste Plan.

\(^9\) The vast majority of ‘Municipal’ waste is household waste but it also includes waste collected by local authorities as a result of other activities e.g. street sweeping, municipal park maintenance.
1.33 The role of planning is to find the most suitable sites to locate modern state-of-the-art facilities to recycle, compost, recover value and extract energy from waste and this requirement is set out in European, National as well as Regional legislation and policy.\textsuperscript{10}

The local context

1.34 In their role as waste disposal authorities, the partner boroughs have formed the South London Waste Partnership. The partnership is in the early stages of a procurement process to secure a long term contract to manage an important part of the boroughs’ waste stream; namely residual municipal waste, which is the black bag waste that cannot be recycled and would otherwise go to landfill. The partnership has been successful in gaining government support for this project, having recently been awarded Private Finance Initiative (PFI) funding.

1.35 The partnership has committed to reducing the amount of municipal waste disposed of in landfill and to increase recycling/composting rates to at least meet, or exceed national targets by 2020.

1.36 The procurement process began in May 2010 and in 2011, the partnership will select the best residual waste treatment technology option that arises from the procurement process, while having due regard to public consultation on the issue.

1.37 With regard to technologies, no preferred technologies have been identified by the partnership. The partnership is ‘technology neutral,’ meaning that all forms of treatment put forward during the procurement will be properly and fairly evaluated. There is no preference for any particular type of technology over another. The Partnership’s evaluation criteria will reward high-performing, low emission, modern, sustainable technologies that offer residents value for money. All boroughs within the partnership are firmly against poor performing, outdated technologies such as old fashioned, mass burn incineration, which is poorly designed, visually intrusive and releases high levels of noxious emissions. Public consultation as part of partnership’s Joint Municipal Waste Management Strategy (JMWMS) in the autumn of 2009 is expected to further endorse this view.

The national and regional policy context

1.38 In London, the Mayor’s London Plan requires all boroughs to identify sites within their boundaries to develop waste management facilities. London currently manages around 60% of its waste within its borders,\textsuperscript{11} with the remainder exported outside the capital to be treated and most is sent to landfill. The Mayor’s London Plan\textsuperscript{12} sets the following targets to increase the amount of London’s waste which is managed in facilities 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

1.39 This represents a big challenge for all London boroughs. The boroughs and the waste management industry now need to respond, by allocating sufficient land to waste management use and by building modern waste management facilities to treat waste locally.

How much land should we set aside for waste management facilities?

1.40 The evidence base identifies that in addition to safeguarding existing waste management sites in the South London Waste Plan area, an additional 20 hectares (approximately 49 acres) of land is needed to enable the building of sufficient facilities to treat the amount of waste which is anticipated to arise within the Plan area by 2021. An explanation of this figure is provided at Section 2 of this document.


\textsuperscript{12} The London Plan is the over-arching policy framework document for London
1.41 The potential sites are discussed fully and available for your comment in section 2 of this document.

**Modern waste management facilities**

1.42 There are various modern technologies available to manage waste. European, UK and regional policy and legislation sets out a framework identifying the most desirable methods, in terms of their environmental impact. Known as the 'waste hierarchy,' it encourages better use of resources by prioritising waste prevention and reuse, followed by recycling / composting and then energy recovery, with disposal as the last option.

*Figure 1.4 The Waste Hierarchy*

| Waste prevention / Reduce: Reducing the amount of waste produced. |
| Reuse: The reuse and repair of items, to prolong their life. |
| Recycling / composting: 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. Within this category, facilities which produce heat and power are preferable to those which simply burn waste. |
| Residual Disposal: Disposal is generally through landfill or thermal treatment without energy recovery. |

1.43 The waste management industry has responded positively to the waste hierarchy and technology is evolving. A range of new technologies is now widely in operation across Europe to recover the maximum value from waste and reduce the climate changing impacts of waste management. Good practice is being currently developed by the Greater London Authority and a study of exemplar facilities will be made available.

1.44 In addition to an evolution in the technologies used to treat waste, the design and appearance of waste facilities has improved. Strict conditions and regulations are set and enforced by the Environment Agency to ensure they are well-managed, clean, non-polluting and do not smell. Because modern facilities are tightly controlled, it enables them to be mixed with other industrial uses. Indeed, national and regional policy (PPS10 and the Mayor's London Plan), encourages the co-location of waste management facilities with compatible industries.

1.45 Table 1.3 provides a description of modern waste facilities and the typical footprint required to build them. It is important that the South London Waste Plan allocates a sufficient mix of site sizes for waste management development.

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<table>
<thead>
<tr>
<th>Type of facility</th>
<th>Description</th>
<th>Typical Land area requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials Recovery Facility (MRF)</td>
<td>Treat mixed dry, recyclable materials. MRFs identify different waste types (paper, cans etc) and mechanically and/or manually sort and segregate them. Materials are bundled and transported to manufacturing facilities, for processing into new products.</td>
<td>A facility managing c. 40,000 tonnes per year would require c. 1 hectare of land</td>
</tr>
<tr>
<td>Composting</td>
<td>Modern composting is covered, takes place in 'in-vessel' composting facilities, with well-regulated airflow to reduce odours.</td>
<td>A facility managing c. 20,000 tonnes per year would require c. 1.25 hectares</td>
</tr>
<tr>
<td>Mechanical Biological Treatment (MBT)</td>
<td>Separates organic material and dry recyclables from mixed waste, recovering the recyclables for the manufacturing industry and the organic element usually for fuel use or composting.</td>
<td>A facility managing c. 125,000 tonnes per year would require c. 1.75 hectares</td>
</tr>
<tr>
<td>Anaerobic Digestion (AD)</td>
<td>A type of composting facility, in the absence of Oxygen. AD facilities produce a biogas by-product that can be used as a fuel source to provide renewable energy. AD facilities typically process food waste.</td>
<td>A facility managing around 15,000 tonnes per year would require c. 1 hectare</td>
</tr>
<tr>
<td>Advanced thermal treatment eg Pyrolysis / Gasification</td>
<td>Thermal treatment facilities use high temperatures to break down waste and can produce energy in the form of heat and power. Modern processes including pyrolysis and gasification use less oxygen than traditional mass-burn incineration and emit fewer air emissions. An advantage of some modern facilities is that they can be designed to be modular; they're made up of small units which can be added or taken away as waste streams or volumes change.</td>
<td>A facility managing c. 115,000 tonnes per year would require c. 2.25 hectares</td>
</tr>
</tbody>
</table>

Source: Table 4A.7 of The Mayor's London Plan
Summary

1.46 In summary, a significant challenge lies ahead to find the right solutions. There will be concerns, but also opportunities. Allocating the right land for waste management facilities can 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.

1.47 The main body of this Report will now present the proposed strategy for managing waste sustainably within the South London Waste Plan area.

- Section 2 seeks your views on potential sites
- Section 3 seeks your views on proposed policies

1.48 Please provide your comments, in writing to the South London Waste Plan Project Manager using the contact details below. Please ensure your response reaches us by midnight on Friday 16th October since we cannot guarantee that late responses will be considered.

Email: southlondonwasteplan@rbk.kingston.gov.uk

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

Phone: 020 8547 5375

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

During the consultation period consultation documents and background reports will be available online at the above web addresses and available to view in hard copy at:

- Borough Council main offices
- All council libraries

Register for a workshop near you

Public workshops will be held in each borough. Please contact the Project Manager to register. This is your opportunity to find out more about the Waste Plan, ask questions and discuss the key issues.

- Croydon 7th September, 7pm, Croydon Clocktower
- Kingston 16th September, 7pm, Guildhall, Kingston
- Merton 9th September, 7pm, Civic Centre, Morden
- Sutton 28th September, 7pm, Civic Offices, Sutton

A light buffet will be provided.
Section 2: Sites

How much land will we need to allocate to waste management facilities?

2.1 The accompanying Technical Report prepared by consultants, Mouchel\textsuperscript{14} identifies that, to manage the predicted arisings for commercial, industrial and municipal waste within the Plan area, we must allocate almost 20 hectares of land by 2021 to waste management facilities. This is in addition to existing waste management sites within the Plan area.

2.2 Feedback received during the previous Issues and Options consultation stage from government bodies and from the waste management industry identified that we should, in fact, allocate a greater area of land than needed, to build some contingency and flexibility into the Plan, since it’s likely that not all sites will be developed. The degree of contingency required, over and above the 20 hectares will be identified in the Publication version of the South London Waste Plan. Until we have received feedback from the industry and site owners and occupiers on site deliverability, we are not able to identify what level of contingency the Plan will allocate to waste.

2.3 The 20 hectares of land allocation has been calculated by identifying the amount of waste predicted to arise in future, minus the existing waste management capacity within the Plan area. The difference is the ‘capacity gap’ which new waste management facilities should seek to fill.

2.4 The capacity gap for the Plan area is illustrated in Figure 2.1. In summary, there are 16 licensed waste facilities within the Plan area currently managing almost 700,000 tonnes of waste per year (not including landfill). At 2010, the evidence shows that we’ll need almost an additional 500,000 tonnes of capacity per year to meet our needs. At 2015, we’ll need an additional 585,000 tonnes of capacity per year and by 2021, we’ll need just over an additional 670,000 tonnes of capacity per year to treat our waste.

Figure 2.1: The capacity gap throughout the lifetime of the South London Waste Plan

Identifying the Long List of sites

2.5 To identify how much land is needed to provide sufficient facilities to meet the capacity gap, Table 4A.7 of the Mayor’s London Plan provides guidance on the types of waste management facilities that

\textsuperscript{14} All background reports, including the Technical Report are available online via http://southlondonwasteplan.limehouse.co.uk
might be used to manage waste in future across the Capital. By applying this configuration of indicative facilities to our capacity gap, we are able to calculate that almost 20 hectares of land is needed by 2021 to manage the Plan area's future waste requirements. The accompanying Technical Report provides further detail on this calculation.

2.6 At Issues and Options consultation, in line with the Mayor's London Plan, we identified our 'areas of search' for sites as:

- Strategic Industrial Locations (Preferred Industrial Locations and Industrial Business Parks)
- Local employment areas (local industrial areas identified in each borough's Unitary Development Plan and emerging Local Development Framework)
- Existing waste sites

2.7 A number of respondents also identified other sites or areas we ought to consider. These are identified in Table 2.1 below. These additional sites have been added to our 'areas of search' where appropriate. Where sites are located outside the Plan area, these have not been included in our area of search, since the South London Waste Plan must identify sites within its own boundaries for future waste management use.

Table 2.1: Additional sites identified through the Issues and Options Consultation

<table>
<thead>
<tr>
<th>Borough:</th>
<th>Area of land:</th>
<th>Suggested by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>Disused sidings to the east of the main railway south of Norwood Junction</td>
<td>Brethrens Gospel Trust</td>
</tr>
<tr>
<td>Kingston</td>
<td>0.8 hectare site south of Silverglades Business Park</td>
<td>The Landowner (Hampshire County Council Pension Fund)</td>
</tr>
<tr>
<td>Kingston</td>
<td>The old B&amp;Q and Comet site on the boundary with Merton</td>
<td>Company with clients in the construction industry looking for sites</td>
</tr>
<tr>
<td>Kingston</td>
<td>A243 for example where is crosses with B280 road</td>
<td>Kingston resident</td>
</tr>
<tr>
<td>Kingston - General comment</td>
<td>The area to the south of Malden Rushett in the RB of Kingston as it is very rural. It is close to the National Grid, but not to other industrial sites.</td>
<td>Sutton resident</td>
</tr>
<tr>
<td>Kingston - General comment</td>
<td>land alongside the A3 away from residential areas should be investigated</td>
<td>Kingston Residents Association</td>
</tr>
<tr>
<td>Kingston</td>
<td>Government site at Tolworth</td>
<td>Kingston Residents Association and two individual Kingston Residents</td>
</tr>
<tr>
<td>Kingston</td>
<td>Allotments and rarely used playing field on the A3, south of Keswick Avenue,</td>
<td>Kingston Residents Association</td>
</tr>
<tr>
<td>Kingston</td>
<td>Land to the north of Worcester Park Road, part of which is derelict industrial land</td>
<td>Kingston Residents Association</td>
</tr>
<tr>
<td>Kingston</td>
<td>Land to the north of Lower Marsh Lane and to the South West of Kingston Road which is only partially utilised by the sewerage works.</td>
<td>Kingston Residents Association</td>
</tr>
</tbody>
</table>
Site assessment process

2.8 Following Issues and Options consultation, around 140 sites were identified in the areas of search ("the Long List"). Details of all sites are available in the accompanying Technical Report prepared by our consultants, Mouchel.

2.9 The suitability of the “Long List” sites for hosting waste management facilities has been assessed by independent environmental consultants, Mouchel, through site visits and desk studies.

2.10 Each site was objectively scored against a list of criteria which are important in helping to decide whether a site is suitable for hosting waste management facilities, in accordance with national planning policy15 and the Mayor's London Plan. These criteria were identified at the previous Issues and Options consultation stage and amended in light of feedback. These criteria are issues which are important to the development of the site for waste use. Criteria include such issues as proximity to residents, proximity to nature conservation areas, the flood risk of a site and the potential impact of traffic on the local road network.

2.11 Scoring all sites against these criteria resulted in a ranked list of sites. Sites falling at the top of the list are potentially the most suitable for hosting waste management facilities when assessed against the objective criteria. Sites falling at the bottom of the list score poorly against a number of criteria and have more issues to overcome which are likely to prevent the development of waste facilities. The scoring results for all “Long List” sites is available in the accompanying Technical Report.

2.12 As identified above, some sites within the ‘Long List’ are sites with an existing waste function. Others are not in waste use and for the purposes of this consultation are called ‘new sites.’ These categories have different policies regarding their development and need to be treated separately.

2.13 More detail on the site assessment methodology is available in the accompanying Technical Report and online via http://southlondonwasteplan.limehouse.co.uk. The attached questionnaire seeks your feedback on these.

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15 Annex E of PPS10: Sustainable Waste Management
Existing sites

2.14 Existing sites are already protected in their current form through policies in the Mayor's London Plan; these are known as “safeguarded sites”. In line with the London Plan, existing waste management sites within the Plan area are protected for their existing, permitted use in proposed Policy WP3 of the South London Waste Plan (see section 3 of this document for proposed policies).

2.15 Because the South London Waste Plan is intended to be a strategic plan, the plan will seek to identify a strategic allocation of suitable sites which will deal with as much of our waste management needs as possible. Table 4A.7 of the Mayor's London Plan identifies the smallest typical landtake for a waste management facility as just under 1 hectare. Within the South London Waste Plan, sites smaller than this are considered to be unlikely to contribute to our strategic need and therefore are not included in our identified sites list. Existing waste sites around 1 hectare and above are presented for your comment in Tables 2.2 and 2.3.

2.16 The existing waste management sites identified in Table 2.2 are considered at this stage to have potential to be re-developed as waste management facilities and we seek your feedback on these sites. Development of waste management facilities on existing sites can result in many improvements. Excellent design, excellent on-site management, improved access etc can all result from development and can often be an improvement to the existing site. In some circumstances, developing a waste site and altering its use to one which treats waste, rather than bulking waste up and moving it on (e.g. a transfer station), actually reduces the number of waste vehicle movements to the site because the bulk of waste is reduced onsite and ‘output’ is reduced. The redevelopment of existing sites could result in more efficient management of waste, could be extended onto adjacent land or could attract other similar developments to reflect the concept of, for example, resource recovery parks (as supported in the Mayor's London Plan). It should be noted that further development may require a planning application.

2.17 Although smaller sites are not considered part of this strategic plan, smaller sites could potentially serve a useful purpose in dealing with waste on a local (e.g. neighbourhood) scale and may offer opportunities for innovative technology. These are not identified within the South London Waste Plan. Instead, policy support for such development will be identified within boroughs’ other Local Development Frameworks. Development of waste management facilities would be controlled by and assessed against the policies within the South London Waste Plan, with particular reference to Proposed Policy WP5 which addresses waste related development on sites which are not specifically allocated to waste in the Plan.

'New' sites and considering their deliverability

2.18 All new sites within the Plan area (i.e. those not currently in waste use) have also been objectively scored against all criteria to identify their suitability for hosting waste management facilities.

2.19 As stated previously, the sites which score well are those which have the fewest constraints and are therefore potentially the most suitable sites for hosting waste management facilities.

2.20 Having a high score however, is not in itself sufficient to determine suitability or availability. Following the ranking of sites, a key test in determining which sites are likely to assist The South London Waste Plan area achieve our Vision and Objectives (presented in Section 3 of this report) is a test of deliverability. This seeks to assess a site’s likelihood for being developed as waste site (also known as the deliverability of sites). National guidance requires us to demonstrate that, “the stock of allocated land does provide sufficient opportunities…” and that to achieve this, “consideration should be given to any identified constraints to site deliverability.”

2.21 Where currently known, or suspected, information has been added to identify constraints on site deliverability. Examples of deliverability constraints are where recent planning permission has been

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granted for another development which results in the site being unlikely to be available in the next ten years (the initial lifetime of the South London Waste Plan). Another example is where a site is allocated in policy for housing development which is a key priority for boroughs.

2.22 Sites where deliverability issues have been identified are presented in Tables 2.3 and 2.5. Based on information currently available, we anticipate that they are unlikely to be deliverable during the lifetime of the Plan (10 years). We are seeking confirmation (or otherwise) of these possible constraints during this consultation period by seeking feedback from a range of stakeholders including site owners and occupiers.

2.23 As well as seeking views on whether sites are deliverable at all, feedback is also sought on the likely phasing of development i.e. when they are likely to be delivered. The South London Waste Plan is required to demonstrate that additional waste management capacity will be delivered over time, to meet the Plan area's apportionment figures within the Mayor's London Plan for 2010, 2015 as well as 2020.

2.24 As well as identifying constraints to site deliverability, it is important to take a holistic view and also identify where there may be particular opportunities. So, for example, although a site doesn't receive the highest score against the objective site assessment criteria, if evidence suggests that it has potential to be delivered as a waste site that meets strategic needs, this should be explored at an early stage.

**Industrial estates**

2.25 Large industrial estates have been included in our areas of search. In the methodology undertaken, these have been scored against the objective criteria.

2.26 Generally, waste management facilities are potentially suitable for a range of sites within these industrial estates when they become available. At this stage it therefore may not be appropriate to identify specific plots within the industrial estates when a range of sites may be deliverable. For example, Chessington Industrial Estate in Kingston is a large site covering almost 35 hectares. A number of areas within Chessington Industrial Estate are likely to be suitable.

2.27 These high scoring industrial estates are identified in a separate list and it is expected that some appropriate sites will become available throughout the Plan period. We seek your feedback on whether there are particular areas within the identified industrial areas which are suitable for waste management use.

2.28 The sites are presented in the following tables which have accompanying maps. We seek your feedback on all:

- **Table 2.2** contains existing waste sites considered to have potential for re-development as waste management facilities
- **Table 2.3** contains existing waste sites with possible delivery constraints
- **Table 2.4** contains top scoring new sites with opportunity for developing waste management facilities which require further investigation
- **Table 2.5** contains top scoring new sites with possible deliverability constraints which require further investigation
- **Table 2.6** contains industrial estates which generally score well and are expected to have some deliverable areas

**How much land to allocate for waste management?**

2.29 The evidence base identifies that around 20 hectares of new sites are needed to enable the Plan area to meet the apportionment requirements of the London Plan and manage the equivalent of its own waste arisings for commercial, industrial and municipal waste at 2021.
2.30 However, a greater area of land will need to be allocated in the final version of the South London Waste Plan to allow for flexibility over the life of the Plan. An over-provision of sites will build this flexibility into the Plan and improve the likelihood of the required number of sites being developed, since not all sites are likely to be developed. A longer list is also required to provide a sufficient mix of types and sizes of sites throughout the Plan area. Over-development will be prevented through Proposed Policy WP1 which requires developers to demonstrate the need for their facility. De-designation of over provided sites can occur if the annual monitoring for the Plan shows, over time that less land needs to be allocated.

Next steps

2.31 During the consultation period, the questionnaire and consultation materials will be available online, in your nearest library or council main reception or in hard copy from the Project Manager. Feedback on the potential sites and policies will be sought from local residents, businesses, government bodies, the waste management industry and the owners and occupiers of potential sites.

2.32 Not all sites will be needed in the final list. Feedback at this stage will help develop the final version of the South London Waste Plan due to be published in February 2010. It will then be submitted to the Secretary of State for examination by an independent planning inspector.

2.33 The following pages identify the potential sites, for your comment. The remainder of the document then sets out the proposed policies for the South London Waste Plan, for your comment.

2.34 All maps appearing within this document are reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty’s Stationary Office. © Crown Copyright. London Borough of Croydon 10000855; Royal Borough of Kingston Upon Thames 100019285; London Borough of Merton 100019259; London Borough of Sutton 100008655X. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings.
Figure 2.2: Map of the South London Waste Plan area showing the distribution of potential sites.
Table 2.2: Existing waste sites considered to have potential for re-development as waste management facilities, by borough.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Facility Type</th>
<th>Comment on site potential for re-development and deliverability*</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1.79</td>
<td>Croydon</td>
<td>Factory Lane Transfer Station</td>
<td>Transfer Station</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>6</td>
<td>1.86</td>
<td>Kingston</td>
<td>Villiers Road Waste Transfer Station</td>
<td>Transfer Station</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>126</td>
<td>3.87</td>
<td>Merton</td>
<td>Benedict Wharf Whole Site Transfer Station</td>
<td>Transfer Station</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>9</td>
<td>2.05</td>
<td>Merton</td>
<td>Garth Road civic amenity site Transfer Station</td>
<td>Transfer Station</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>22</td>
<td>1.03</td>
<td>Merton</td>
<td>Willow Lane Industrial Estate, B Nebbett &amp; Son Ltd</td>
<td>ELV Facility</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>17</td>
<td>2.38</td>
<td>Sutton</td>
<td>Beddington Lane, Country Skip Hire</td>
<td>Transfer Station</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>21</td>
<td>0.97</td>
<td>Sutton</td>
<td>Beddington Lane, Coomber Way, 777 Demolition &amp; Haulage Co Ltd</td>
<td>Materials Recovery Facility</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>100</td>
<td>1.04</td>
<td>Sutton</td>
<td>Beddington Lane, Therapia Way, European Metal Recycling (EMR) Limited</td>
<td>Metal Recycling Site</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>97</td>
<td>0.96</td>
<td>Sutton</td>
<td>Beddington Lane, Severnside Waste Paper</td>
<td>Recovery of recycling</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
<tr>
<td>18</td>
<td>4.02</td>
<td>Sutton</td>
<td>Viridor Recycling Centre Beddington Farmlands</td>
<td>Materials Recovery Facility</td>
<td>Has potential</td>
<td>No deliverability constraints yet identified.</td>
</tr>
</tbody>
</table>

* Deliverability is an assessment of a site's likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g., housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

Your feedback is sought on these potential sites. Please provide your feedback using the questionnaire which appears at the end of this document.
Site plans of the existing waste sites considered to have potential for re-development, identified in Table 2.2

Your feedback is sought on these potential sites. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 1: Factory Lane Transfer Station, Croydon

Site 6: Villiers Road, Athelstan Road, Kingston

Site 126: Benedict's Wharf, Merton

Site 9: Garth Road civic amenity site, Merton

Site 22: Willow Lane Industrial Estate, B Nebbett & Son Ltd, Merton

Site 17: Beddington Lane, Country Skip Hire, Sutton
Site plans of the existing waste sites considered to have potential for re-development, identified in Table 2.2

Your feedback is sought on these potential sites. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 21: Beddington Lane, Coomber Way, 777 Demolition & Haulage Co ltd, Sutton

Site 100: Beddington Lane, Therapia Way, European Metal Recycling (EMR) Limited, Sutton

Site 97: Beddington Lane, Severnside Waste Paper, Sutton

Site 18: Viridor Recycling Centre Beddington Farmlands, Sutton
Table 2.3: Existing waste sites with possible delivery constraints

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Facility Type</th>
<th>Comment on site potential for re-development and deliverability*</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>86</td>
<td>2.02</td>
<td>Croydon</td>
<td>Days Aggregates</td>
<td>Manufacture of products from waste</td>
<td>Low potential</td>
<td>WP3</td>
</tr>
</tbody>
</table>

Deliverability is an assessment of a site’s likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g., housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

Site plans of existing waste sites considered to have possible delivery constraints, identified in Table 2.3

Site 86: The Days Aggregates site in Purley, Croydon

Your feedback is sought on this site and the deliverability constraints identified. Please provide your feedback using the questionnaire which appears at the end of this document.
Table 2.4: Top scoring new sites with opportunity for developing waste management facilities, which require further investigation, by borough.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Comment on site potential for re-development and deliverability *</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>105</td>
<td>7.02</td>
<td>Croydon</td>
<td>Factory Lane Industrial Estate</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>125</td>
<td>3.11</td>
<td>Croydon</td>
<td>Factory Lane (South side)</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>99</td>
<td>1.68</td>
<td>Croydon</td>
<td>Purely Oaks Highway Depot</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>47</td>
<td>1.72</td>
<td>Kingston</td>
<td>Land at Kingston Road / Jubilee Way junction, Tolworth.</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>46</td>
<td>3.42</td>
<td>Kingston</td>
<td>Leatherhead Road, Chessington, Coal Depot adjacent to Barwell Business Park</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>641</td>
<td>3.39</td>
<td>Merton</td>
<td>Area east Weir Road, Durnsford Road Industrial Area</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>136</td>
<td>1.45</td>
<td>Merton</td>
<td>Deer Park Road site</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
<tr>
<td>702</td>
<td>5.6</td>
<td>Merton</td>
<td>Garth Road Industrial Area</td>
<td>Has potential</td>
<td>Site scores well against suitability criteria. Deliverability constraints to be identified through consultation</td>
</tr>
</tbody>
</table>
Deliverability is an assessment of a site's likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g. housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Comment on site potential for re-development and deliverability*</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>651</td>
<td>9.52</td>
<td>Merton</td>
<td>Part of the Plough Lane Industrial Area</td>
<td>Has potential. Site scores well against suitability criteria.</td>
<td>WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Deliverability constraints to be identified through consultation</td>
<td></td>
</tr>
<tr>
<td>60</td>
<td>3.18</td>
<td>Merton</td>
<td>Rainbow Park industrial Area</td>
<td>Has potential. Site scores well against suitability criteria.</td>
<td>WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Deliverability constraints to be identified through consultation</td>
<td></td>
</tr>
<tr>
<td>127</td>
<td>1.94</td>
<td>Merton</td>
<td>Willow Lane area by Wandle River</td>
<td>Has potential. Site scores well against suitability criteria.</td>
<td>WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Deliverability constraints to be identified through consultation</td>
<td></td>
</tr>
<tr>
<td>57</td>
<td>6.76</td>
<td>Sutton</td>
<td>Land west of Beddington Lane adjacent to industrial areas and existing waste management facilities</td>
<td>Has potential. Site scores well against suitability criteria.</td>
<td>WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No deliverability constraints and early deliverability opportunities have been identified</td>
<td></td>
</tr>
</tbody>
</table>

* Deliverability is an assessment of a site's likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g. housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

Your feedback is sought on these potential sites. Please provide your feedback using the questionnaire which appears at the end of this document.
Site plans of top scoring new sites with opportunity for developing waste management facilities, identified in Table 2.4

Your feedback is sought on these potential sites. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 105: Factory Lane Industrial Estate, Croydon
Site 125: Factory Lane (South side), Croydon

Site 99: Purely Oaks Highway Depot, Croydon
Site 47: Land at Kingston Road / Jubilee Way junction, Tolworth, Kingston

Site 46: Leatherhead Road, Chessington, Coal Depot adjacent to Barwell Business Park, Kingston
Site 641: Area east Weir Road, Durnsford Road Industrial Area, Merton
Site plans of top scoring new sites with opportunity for developing waste management facilities, identified in Table 2.4

Your feedback is sought on these potential sites. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 136: Deer Park Road site, Merton

Site 702: Garth Road Industrial Area

Site 651: Part of the Plough Lane Industrial Area, Merton

Site 60: Rainbow Park industrial Area, Merton

Site 127: Willow Lane area by Wandle River, Merton

Site 57: Land west of Beddington Lane adjacent to industrial areas and existing waste management facilities, Sutton
<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Comment on site potential for re-development and deliverability *</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>104</td>
<td>1.73</td>
<td>Croydon</td>
<td>Purley Way Lombard Business Park</td>
<td>Low potential Site scores well against suitability criteria but deliverability issues have been identified. Site is recently developed.</td>
<td>None</td>
</tr>
<tr>
<td>124</td>
<td>3.24</td>
<td>Kingston</td>
<td>Former Government Offices, Hook Rise South, adjoining sites fronting Kingston Road and Tolworth Station. Tolworth Aggregates Depot south of railway.</td>
<td>Low potential Site scores well against suitability criteria but deliverability issues have been identified. Site is identified for housing development in UDP policies and emerging Core Strategy</td>
<td>None</td>
</tr>
<tr>
<td>41</td>
<td>2.85</td>
<td>Kingston</td>
<td>Kingston Road, Tolworth Aggregates Depot south of railway.</td>
<td>Low potential Site scores well against suitability criteria but deliverability issues have been identified. Site is occupied by London Buses, London Concrete and Day Aggregates who are on 25 year leases. The aggregates company need the railhead to import primary aggregates into London.</td>
<td>None</td>
</tr>
<tr>
<td>45</td>
<td>7.71</td>
<td>Kingston</td>
<td>Leatherhead Road, Chessington, Barwell Business Park</td>
<td>Low potential Site scores well against suitability criteria but deliverability issues have been identified. Site is in office use. Not compatible with heavier industrial use.</td>
<td>None</td>
</tr>
<tr>
<td>36</td>
<td>2.15</td>
<td>Kingston</td>
<td>Leatherhead Road, Malden Rushett, Silverglade Business Park</td>
<td>Low potential Site scores well against suitability criteria but deliverability issues have been identified. Site is in business use. Not compatible with heavier industrial use.</td>
<td>None</td>
</tr>
</tbody>
</table>
Deliverability is an assessment of a site's likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g., housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Comment on site potential for re-development and deliverability*</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>33</td>
<td>3.77</td>
<td>Kingston</td>
<td>Red Lion Road, Red Lion Road Estate, Tolworth.</td>
<td>Site scores well against suitability criteria but deliverability issues have been identified. Incompatible with adjacent development (existing secondary school adjacent). Furthermore, the adjacent site is identified as a Building Schools for the Future project to develop two secondary schools.</td>
<td>None</td>
</tr>
<tr>
<td>751</td>
<td>4.84</td>
<td>Merton</td>
<td>Burlington Road west side junction with A3</td>
<td>Site scores well against suitability criteria but deliverability issues have been identified. Site is no longer available. A B&amp;Q retail store has been built on this site.</td>
<td>None</td>
</tr>
<tr>
<td>73</td>
<td>3.7</td>
<td>Merton</td>
<td>Bushey Road Industrial Area</td>
<td>Site scores well against suitability criteria but deliverability issues have been identified. Site is dominated by retail development.</td>
<td>None</td>
</tr>
<tr>
<td>61</td>
<td>3.69</td>
<td>Merton</td>
<td>Dundonald Road Industrial Estate</td>
<td>Site scores well against suitability criteria but deliverability issues have been identified. Site is owned by network rail who consider this a strategic site.</td>
<td>None</td>
</tr>
<tr>
<td>492</td>
<td>7.69</td>
<td>Sutton</td>
<td>Kimpton Industrial Estate, Land East of Kimpton Road</td>
<td>Site scores well against suitability criteria but deliverability issues have been identified. Site has been recently redeveloped as high value trade retail and storage.</td>
<td>None</td>
</tr>
</tbody>
</table>

*Deliverability* is an assessment of a site's likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g., housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

Your feedback is sought on these sites and their deliverability constraints identified. Please provide your feedback using the questionnaire which appears at the end of this document.
Site plans of top scoring new sites with possible deliverability constraints, identified in Table 2.5

Your feedback is sought on these sites and their deliverability constraints identified. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 104: Purley Way Lombard Business Park Croydon

Site 124: Former Government Offices, Hook Rise South, adjoining sites fronting Kingston Road and Tolworth Station. Tolworth

Site 41: Kingston Road, Tolworth Aggregates Depot south of railway, Kingston

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

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

Site 33: Red Lion Road, Red Lion Road Estate, Tolworth, Kingston
Site plans of top scoring new sites with possible deliverability constraints, identified in Table 2.5

Your feedback is sought on these sites and their deliverability constraints identified. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 751: Burlington Road west side junction with A3, Merton

Site 73: Bushey Road Industrial Area, Merton

Site 61: Dundonald Road Industrial Estate, Merton

Site 492: Kimpton Industrial Estate, Land East of Kimpton Road, Sutton
Table 2.6 Industrial estates which generally score well and are expected to have some deliverable areas.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Comment on site potential for re-development and deliverability *</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>102</td>
<td>34.91</td>
<td>Croydon</td>
<td>Purley Way, Lysander Road and Imperial Way Industrial Area</td>
<td>Has some potential. Estate generally scores well against suitability criteria.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td>351, 352 and 353</td>
<td>41.45</td>
<td>Kingston</td>
<td>Moor Lane, Chessington. Chessington Industrial Estate</td>
<td>Has some potential. Estate generally scores well against suitability criteria.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td>642</td>
<td>12.64</td>
<td>Merton</td>
<td>Durnsford Road Industrial Area</td>
<td>Has some potential. Estate generally scores well against suitability criteria.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td>69</td>
<td>41.45</td>
<td>Merton</td>
<td>Willow Lane Industrial Area</td>
<td>Has some potential. Estate generally scores well against suitability criteria.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td>5312</td>
<td>4.27</td>
<td>Sutton</td>
<td>Beddington Industrial Area Zone 12</td>
<td>Has some potential. Estate generally scores well against suitability criteria. However potential deliverability issues include access difficulties from west, adjacent to retail uses, major electricity switching station and overhead power cables.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td>532</td>
<td>8.57</td>
<td>Sutton</td>
<td>Beddington Industrial Area Zone 2</td>
<td>Has some potential. Estate generally scores well against suitability criteria. However existing large factor which has been latterly developed and extended.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td>533</td>
<td>4.53</td>
<td>Sutton</td>
<td>Beddington Industrial Area Zone 3</td>
<td>Has some potential. Estate generally scores well against suitability criteria. However modern higher value warehousing buildings likely to limit deliverability.</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
</tbody>
</table>
Deliverability is an assessment of a site’s likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g., housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Area</th>
<th>Borough</th>
<th>Description</th>
<th>Comment on site potential for re-development and deliverability*</th>
<th>Proposed policy coverage in the South London Waste Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>534</td>
<td>4.88</td>
<td>Sutton</td>
<td>Beddington Industrial Area Zone 4</td>
<td>Has some potential</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Estate generally scores well against suitability criteria. However, contains the Croydon Tramlink operations depot and other depots which would require relocation. Includes two existing unrelated waste sites.</td>
<td></td>
</tr>
<tr>
<td>535</td>
<td>4.65</td>
<td>Sutton</td>
<td>Beddington Industrial Area Zone 5</td>
<td>Has some potential</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Estate generally scores well against suitability criteria. Limited opportunity for further deliverability.</td>
<td></td>
</tr>
<tr>
<td>539</td>
<td>13.48</td>
<td>Sutton</td>
<td>Beddington Industrial Area Zone 9</td>
<td>Has some potential</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Estate generally scores well against suitability criteria. Site is in multiple ownership and includes recently redeveloped business and higher value warehousing units.</td>
<td></td>
</tr>
<tr>
<td>491</td>
<td>5.12</td>
<td>Sutton</td>
<td>Kimpton Industrial Estate, Land North of Minden Road</td>
<td>Has some potential</td>
<td>Part of the estate could be identified within WP4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Estate generally scores well against suitability criteria and is adjacent to existing recycling/reuse site. However part contains modern established industrial estate and part previous waste tipping site recently sold by owners for redevelopment.</td>
<td></td>
</tr>
</tbody>
</table>

* Deliverability is an assessment of a site's likelihood of being developed as a waste site. Examples of deliverability factors include whether the site is still available and whether the site is identified for another policy use (e.g., housing). Feedback from site owners and occupiers will be sought during the consultation period to better understand the deliverability of these sites.
Site plans for industrial estates which generally score well and are expected to have some deliverable areas, identified in Table 2.6

Your feedback is sought on these industrial estates and their deliverability constraints identified. Please provide your feedback using the questionnaire which appears at the end of this document.

Site 102: Purley Way, Lysander Road and Imperial Way Industrial Area, Croydon

Site 351: Chessington Industrial Estate, Kingston

Site 352: Chessington Industrial Estate, Kingston

Site 353: Chessington Industrial Estate, Kingston

Site 642: Durnsford Road Industrial Area, Merton

Site 69: Willow Lane Industrial Area, Merton
Site plans for Industrial estates which generally score well and are expected to have some deliverable areas, identified in Table 2.6

Your feedback is sought on these industrial estates and their deliverability constraints identified. Please provide your feedback using the questionnaire which appears at the end of this document.

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

Sites 5312, 532, 533, 534, 535, 539: Beddington Farmlands, Sutton
Section 3: Proposed policies for the South London Waste Plan

Objectives for the South London Waste Plan

3.1 The objectives for the Waste DPD are set out in the four partner boroughs’ emerging Core Strategies. The common objectives set out in each emerging Core Strategy document are that:

- By working in partnership, the four boroughs will seek to maximise self-sufficiency in managing the waste generated by the four boroughs;
- The boroughs will identify sufficient land to enable this;
- That, with regard to the location of sites, the boroughs will be guided by regional and national policy and the broad locations of strategic industrial locations, local employment areas and existing waste management sites;
- That the boroughs will safeguard existing waste management sites and seek to intensify their development where appropriate;
- That the boroughs will support the recycling and composting of waste by requiring new developments to provide space to enable the storage and collection of recyclables.

3.2 To address these objectives, the partner boroughs have identified a Vision and Objectives for the South London Waste Plan. This was originally consulted upon during the 2008 Issues and Options consultation. Feedback received during that time has been incorporated into the Vision and Objectives for the South London Waste Plan, identified in Table 3.1.

Table 3.1 Proposed Vision and Objectives for the South London Waste Plan

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

<table>
<thead>
<tr>
<th>Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>The South London Waste Plan will:</td>
</tr>
<tr>
<td>1. Provide a sustainable framework for the management of all waste streams occurring within Croydon, Kingston, Merton and Sutton.</td>
</tr>
<tr>
<td>2. Reduce the climate change impact of waste management by promoting waste minimisation, re-use, recycling and composting and energy recovery, in line with the waste hierarchy, by encouraging waste to be managed close to its source and to be transported sustainably and by encouraging new facilities to minimise greenhouse gas emissions.</td>
</tr>
<tr>
<td>3. Identify enough land within the partner boroughs 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, where appropriate.</td>
</tr>
<tr>
<td>4. Have waste sites in appropriate places, using the most appropriate technology and ensure that environmental, social and economic benefits are maximised without causing harm to local people and the environment.</td>
</tr>
<tr>
<td>5. Think of waste as a resource.</td>
</tr>
<tr>
<td>6. Involve local communities and other stakeholders in decision making.</td>
</tr>
<tr>
<td>7. Support the key aims and objectives of Croydon, Kingston, Merton and Sutton’s Community Strategies and Municipal Waste Management Strategies.</td>
</tr>
</tbody>
</table>
3.3 The Vision and Objectives will be delivered through a number of policies which will guide development at specified areas or sites and set out criteria that must be taken into account by the boroughs when determining proposals for waste development. Because the South London Waste Plan is being prepared as a joint plan, the final policies will be adopted and used by all boroughs when assessing applications for waste management facilities.

3.4 In considering the evidence base accumulated so far, the partner boroughs have identified the following key policy areas affecting the development of sustainable waste management facilities across the Plan area and the success of the South London Waste Plan in achieving the Plan's Vision for 2021.

**Policy Issue 1:** Defining the strategic approach

**Policy Issue 2:** Encouraging waste minimisation

**Policy Issue 3:** Safeguarding existing waste management sites

**Policy Issue 4:** Identifying proposed waste management sites

**Policy Issue 5:** Managing the development of waste management facilities on unallocated sites

**Policy Issue 6:** Development criteria which proposals will need to satisfy

**Policy Issue 7:** The governance of sustainable, modern energy recovery where appropriate

### Superseded policies

3.5 The policies eventually adopted as part of the South London Waste Plan will supersede any borough-level policies which still exist within the partner borough's Unitary Development Plans (UDPs).

3.6 Table 3.2 identifies the existing borough policies which the proposed policies of the South London Waste Plan intend to replace.

<table>
<thead>
<tr>
<th>Borough</th>
<th>Policy Reference</th>
<th>Policy description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>SP11: Opportunities for waste management facilities</td>
<td>Strategic policy</td>
</tr>
<tr>
<td>Croydon</td>
<td>EP8: Waste and recycling</td>
<td>Strategic policy governing the location of waste management facilities</td>
</tr>
<tr>
<td>Croydon</td>
<td>EP9: Waste and recycling</td>
<td>Safeguarding against loss of existing waste management facilities</td>
</tr>
<tr>
<td>Croydon</td>
<td>UD15: Design policy</td>
<td>Provision of storage infrastructure for recyclables, to enable recycling collections.</td>
</tr>
<tr>
<td>Kingston</td>
<td>Policy MW1: Development of Waste Management Facilities</td>
<td>Strategic policy governing the location of waste management facilities</td>
</tr>
<tr>
<td>Merton</td>
<td>Policy PE9: Waste Minimisation and Waste Disposal</td>
<td>Requires major new industrial developments to minimise waste</td>
</tr>
<tr>
<td>Merton</td>
<td>Policy PE11: Recycling points</td>
<td>Provision of storage infrastructure for recyclables, to enable recycling collections.</td>
</tr>
<tr>
<td>Sutton</td>
<td>PNR20: Sites for waste related development</td>
<td>Policy identifying the location of waste management facilities</td>
</tr>
</tbody>
</table>

It should be noted that at the time of writing, Croydon are waiting for confirmation from GOL regarding the status of their policies listed below (i.e. whether they are to be saved as policies for Croydon, or whether they are to be deleted entirely).
Policy Issue 1: Defining the strategic approach

Background

3.7 During the South London Waste Plan's 'Issues and Options' consultation, feedback was sought on how much waste the Waste Plan should plan for.

3.8 With regard to municipal, commercial and industrial waste, views were sought on whether the Waste Plan should allocate sufficient suitable sites for waste management to meet either the apportionment in 2021 (the equivalent of 97% of the municipal, commercial, industrial anticipated to arise in the Plan area in 2021) or whether the Waste Plan should allocate sufficient suitable sites for waste management to manage the equivalent of 100% of the commercial, industrial and municipal waste generated in 2021 (anticipated to be 40,000 tonnes more per year at 2021 than the apportionment).

3.9 Feedback was received supporting both options. However, slightly more respondents providing written responses thought the Waste Plan should plan to manage the equivalent of 100% of municipal, commercial and industrial waste arisings. Furthermore, a number of comments were made during the consultation which identified the importance of building flexibility into the Plan. Planning to meet the equivalent of self-sufficiency for municipal, commercial and industrial waste arisings would build in this flexibility by providing a number of contingency sites above the apportionment requirement, should some sites not come forward for development.

3.10 The Interim Sustainability Appraisal, published alongside the Issues and Options consultation documents identified that striving for self-sufficiency would have greater sustainability benefits than simply planning to meet our apportionment. The Interim Sustainability Appraisal identified that self-sufficiency would reduce the need for disposal either within or outside the plan area, avoid the need for longer waste-related trips, provide greater flexibility within the plan (i.e. thus allowing for the inherent uncertainty in waste forecasts) and encourage local communities to take a greater responsibility for their own waste.

3.11 Although it is not anticipated that additional sites are needed for managing other waste streams (construction, demolition and excavation wastes, hazardous waste and agricultural waste), the flexibility built into the plan allocates additional sites above those required to meet the apportionment, should they be needed to cater for an increase in these other waste streams.

Alternative Policy options

3.12 It is considered that the Proposed Policy WP1 is the only realistic approach that's consistent with the evidence base for this issue. The proposed policy enables the Plan to meet the additional waste management capacity needed throughout the Plan period and satisfy the Plan's objective to plan for the equivalent of self-sufficiency in waste management.

3.13 Proposed Policy WP1 also addresses the need for the Plan to be ‘flexible’ and is in conformity with the conclusions of the Interim Sustainability Appraisal.

Table 3.3: Proposed supporting text to Policy WP1: The Strategic Approach

<table>
<thead>
<tr>
<th>Additional waste capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>PPS10 requires that the Joint Waste DPD identifies sites and areas suitable for the waste management facilities that support the apportionment for municipal, commercial and industrial waste set out in the Mayor's London Plan (2008). 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. London Plan Policy 4A.25 states that each borough must identify sufficient land to provide capacity to manage their apportioned tonnages 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.</td>
</tr>
</tbody>
</table>

18 The apportionment is identified in the Mayor’s London Plan. It is a quantity of municipal, commercial and industrial waste which each London borough must manage within its own boundaries. It represents the minimum amount of waste each planning authority must plan for.
boroughs, but combined, enables the Capital to meet the London Plan’s target for 85% self-sufficiency in waste management by 2020.

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 to enable this DPD to be a 10-year plan, running from 2011 to 2021, as required by Planning Policy Statement 10: Sustainable Waste Management.

The combined apportionment identified in the London Plan for the South London Waste Plan area is identified in Table 3.4 below. In Table 3.4, the apportionment is also compared to the amount of waste which is predicted to arise within the plan area (predicted waste arisings). As Table 3.4 identifies, over time, the apportionment and the predicted waste arisings converge. At 2021, the predicted waste arisings are only in the region of 40,000 tonnes more per year than the apportionment. Given the Plan’s vision to have sufficient facilities to meet the needs of the plan area’s communities, the South London Waste Plan plans to exceed the apportionment and provide sufficient and timely provision to manage the quantities of commercial, industrial and municipal waste expected to arise over the Plan period.

**Identifying landtake**

For land-use planning purposes, the additional waste management capacity identified must be translated into an area of land. This will enable sufficient land to be allocated to enable the development of enough new and/or enhanced waste management facilities to meet our additional waste management capacity needs. Table 4A.7 of the Mayor’s London Plan (2008) identifies an indicative range of facilities which will deliver the increased waste management capacity needed in London. This configuration of facilities has been applied to the additional capacity needed to meet the Plan area’s needs in 2021. The accompanying Technical Report has identified that around 20 hectares of land needs to be allocated to waste management across the Plan area.

**Facilities needed**

The first key planning objective of PPS10 requires local planning authorities to deliver planning strategies which drive waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for. Proposed Policy WP1 reflects this, by requiring the development of waste management facilities to be in accordance with the waste hierarchy and requiring developers to manage waste as high up the waste hierarchy as possible.

**Flexibility**

An important aspect of the Plan is to be flexible to address any changes in the predicted waste arisings, any changes in the requirements of the Mayor’s London Plan (which is currently undergoing a review) and to address the non-development of any allocated sites. Allocating a greater area of land over and above that which is required to meet the plan area’s additional waste management capacity needs will provide some contingency, should some sites remain undeveloped. Allocating a greater area of land will therefore increase the likelihood of the required capacity being developed.

---

**Table 3.4: Additional waste management capacity and landtake required, throughout the plan period for commercial, industrial and municipal waste**

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Combined plan area apportionment (000s tonnes)</td>
<td>854</td>
<td>1,133</td>
<td>1,332</td>
<td>1,332</td>
</tr>
<tr>
<td>Predicted waste arisings (000s tonnes)</td>
<td>1,192</td>
<td>1,280</td>
<td>1,372</td>
<td>1,366</td>
</tr>
<tr>
<td>Additional waste management capacity needed to manage predicted waste arisings (000s tonnes)</td>
<td>497</td>
<td>585</td>
<td>677</td>
<td>671</td>
</tr>
<tr>
<td>Landtake for predicted waste arisings (hectares)</td>
<td>16</td>
<td>18</td>
<td>20</td>
<td>20</td>
</tr>
</tbody>
</table>
Other waste streams - construction, demolition and excavation waste

Data for this waste stream is only available for London as a region. Borough level data is not available. The most recent data from 2005 shows that of the 8 million tonnes of C, D & E waste produced in the capital, over 5 million tonnes was recycled and only 1 million tonnes was disposed of at landfill with the remainder being spread on registered exempt sites.

The requirements of Proposed Policy WP2 will encourage the onsite recycling of this waste stream to help meet the target of 95% recycling identified in Table 2.1. In addition, the Plan area has a landfill site which is licensed throughout the lifetime of this Plan, at Beddington Farmlands, Sutton. All existing sites within the Plan area which already contribute to the management of this waste stream are safeguarded under Proposed Policy WP3.

It is therefore not anticipated that additional capacity will be needed within the Plan area to treat construction, demolition and excavation waste. However, should arisings increase in future, there is flexibility built into the Plan through allocating more sites than required to meet the apportionment. Any application for a new waste management facility that manages construction, demolition and excavation waste would be determined in accordance with the policies of the South London Waste Plan.

Other waste streams - hazardous waste

The definition of hazardous waste includes substances that are commonly found in the municipal, commercial, industrial (including waste electronic and electrical equipment; WEEE) and construction, excavation and demolition waste streams (e.g. asbestos and contaminated soils). Hazardous wastes are routinely separated from these waste streams for specialist treatment.

The amount of hazardous waste produced within the Plan area is small (16,000 tonnes in 2006) and recent trends show an overall decline in this waste stream since 1999. It is not anticipated that additional capacity will be needed within the Plan area to treat hazardous waste. However, should arisings increase in future, there is flexibility built into the Plan through allocating more sites than required to meet the apportionment. Any application for a new waste management facility that treats hazardous waste would be determined in accordance with the policies of the South London Waste Plan.

Other waste streams - agricultural waste

The most recent Environment Agency data on agricultural waste identifies only 35,000 tonnes of agricultural waste produced in London and the arisings. There is no borough level data available, though the amount of agricultural waste produced within the Plan area is anticipated to be negligible. The majority of biodegradable waste produced is composted and used on the land and other agricultural waste is treated as any other commercial or industrial waste, collected and treated by private contractors. By safeguarding the existing waste management facilities in the borough through Proposed Policy WP3, any agricultural waste arising within the borough can continue to be transferred and/or treated in the current manner.

It is not anticipated that additional capacity will be needed within the Plan area to treat agricultural waste. However, should arisings increase in future, there is flexibility built into the Plan through allocating more sites than required to meet the apportionment. Any application for a new waste management facility that treats agricultural waste would be determined in accordance with the policies of the South London Waste Plan.
**Proposed Policy WP1: The Strategic Approach**

Sufficient planning permissions will be granted to meet the apportionment requirements of the London Plan and go beyond this and seek to maximise self-sufficiency in managing the waste generated by the four boroughs.

The additional waste management capacity needed throughout the plan period will be monitored annually through the borough's Annual Monitoring Reports.

The partner boroughs will deliver this additional waste management capacity through permitting development which seeks to manage waste as high up the waste hierarchy as practically possible whilst safeguarding communities and the environment by meeting all policies within the South London Waste Plan.

Development to meet the additional capacity needs will be encouraged on the most suitable sites for development identified in Policy WP4.

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**Policy Issue 2: Encouraging waste minimisation**

**Background**

3.14 During the Issues and Options consultation for the development of the South London Waste Plan, a strong theme at workshops and in written responses was for the Waste Plan to address the prevention of waste. Retailers, notably supermarkets were frequently identified as needing to do more to minimise the amount of waste arising in the first instance by reducing unnecessary packaging. Many respondents felt the Waste Plan needs to identify the links between waste planning and the work of partners in reducing the quantities of waste produced in the first instance.

**Alternative Policy options**

3.15 Reducing the amount of waste produced is being tackled by a number of partners. It is appropriate that objectives to reduce municipal waste arisings sit locally within each borough's Municipal Waste Management Strategy and in the South London Waste Partnership's emerging Joint Municipal Waste Management Strategy which is due for consultation in late 2009/early 2010. The partner borough's waste teams are responsible for delivering the infrastructure and services necessary to support waste reduction and are also responsible for delivering the awareness-raising campaigns which are so important in encouraging a change in behaviour towards waste.

3.16 The reduction of packaging waste is a national issue which is being addressed through partnership working and the introduction of targets to reduce packaging and increase the recycled content of packaging by the Government's Waste Resource Action Programme (WRAP). It would therefore not be appropriate for the South London Waste Plan to repeat the national policies already in existence to govern this work.

3.17 The planning system does however have an important role to play in reducing waste arisings in other ways: principally by encouraging a reduction in the quantities of waste generated through the construction process, encouraging re-use of construction materials and by securing the storage space necessary in new developments to enable occupiers to separate materials ready for collection to be recycled.

3.18 Since waste minimisation and packaging reduction targets are dealt with in other strategies, lead by other agencies, it is considered that Proposed Policy WP2 is the only realistic approach to address waste minimisation in the South London Waste Plan.
Table 3.6: Proposed supporting text to Policy WP2: Sustainable waste management

**Sustainable design and construction standards**
For non-residential developments, the Building Research Establishment (BRE) has established a range of BREEAM schemes for rating the overall environmental performance of different types of building. Buildings are rated on a scale of 'pass,' 'good,' 'very good,' 'excellent' or 'outstanding.' In seeking to promote the highest standards of sustainable design and construction for waste management facilities throughout the plan area, it is considered that Proposed Policy WP2 is fundamental to achieving the Plan's Objective of maximising environmental, social and economic benefits without causing harm to local people and the environment, as well as the Plan's objective to reduce the climate change impact of waste by minimising greenhouse gas emissions from new developments.

Policy 4A.3 of the London Plan on 'Sustainable design and construction' states that Boroughs should ensure future developments meet the highest standards of sustainable design and construction and sets out a wide range of measures to be considered. All major development proposals should be accompanied by a sustainable design and construction statement prepared in line with the 'essential' and 'preferred' standards set out in the Mayor's Supplementary Planning Guidance (SPG). These standards are currently being reviewed to reflect the Revised London Plan and to clarify the relationship with the Code for Sustainable Homes. Proposed Policy WP2 also supports the aims of Government guidance and the relevant London Plan policies.

London Plan policy 4A.28 on construction, excavation and demolition waste identifies that boroughs should ensure major development sites are required to recycle by using mobile facilities on site wherever practicable. The policy further states that boroughs should require developers to produce site waste management plans to arrange for efficient materials and waste handling and require waste to be removed from the site and materials to be brought to the site by water or rail transport wherever practicable. Proposed Policy WP2 satisfies these requirements and is therefore supportive of the London Plan.

Table 3.7: Proposed Policy WP2: Waste Minimisation

**Proposed Policy WP2: Waste Minimisation**
To support waste minimisation the boroughs will permit development of waste management facilities provided:

1) Development meets the current national, regional and local policy requirements and best practice guidance on sustainable design, construction and drainage including the Mayor's Sustainable design and Construction SPG, May 2006, and;

2) Development meets a sustainability rating of 'excellent' under the appropriate BREEAM scheme

3) Waste is minimised and the sustainable management of construction wastes on site is promoted

4) Developers produce a site waste management plan which will arrange for efficient materials and waste handling and wherever practicable, ensure that waste is removed from the site and materials brought to the site by sustainable transport wherever practicable, and;

5) On-site recycling of the construction, demolition and excavation waste arising from the site's development takes place where possible

6) Waste segregation and recycling is encouraged by providing appropriate on-site facilities

7) Efficient use of resources is made and the lifecycle impacts of construction materials are reduced

Your feedback is sought on this Proposed Policy and its supporting text. Please provide your feedback using the questionnaire which appears at the end of this document.
Policy Issue 3: Safeguarding existing waste management sites

Background

3.19 In our 2008 Issues and Options consultation, we sought feedback on where waste facilities should be located. There was a general consensus that existing waste management sites and industrial estates provide a sensible guide as an initial area of search.

Alternative Policy options

3.20 Proposed Policy WP3 satisfies the requirements of the Mayor's London Plan to safeguard existing waste sites and is considered to be the only realistic approach to address existing waste management facilities in the South London Waste Plan.

Table 3.8: Proposed supporting text to Policy WP3: Existing waste management sites

The loss of appropriate sites to other development will make waste, recycling, diversion and recovery targets harder to achieve. With European and National policy requirements to reduce the amount of biodegradable waste sent to landfill and the escalating cost of landfilling waste, together with a recognition that there is now a need to treat waste in more sustainable ways than landfill, national and local policy recognises that local planning authorities have a responsibility to safeguard existing waste sites and allocate appropriate sites for the development of new and/or enhanced future waste management facilities.

Proposed Policy WP3 seeks to safeguard existing waste sites for their existing permitted level of use, thus supporting London Plan policy 4A.24 which seeks to protect existing waste sites. Existing sites have established waste use and contribute to the existing waste management capacity within the Plan area. Loss of these sites would decrease the existing level of waste management capacity within the Plan area, resulting in the need for more new sites to meet the Plan's objective of self-sufficiency. In recognition of this, London Plan 4A.24 identifies that if, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meeting the maximum throughput that the site could have achieved.

With regard to construction, excavation and demolition waste, London Plan policy 4A.28 identifies that boroughs should ensure that existing construction, excavation and demolition waste management sites are safeguarded. Proposed Policy WP3 requires the safeguarding of existing waste sites, including those which manage construction and demolition waste.

With regard to safeguarding existing landfill, as required by London Plan policy 4A.24, the landfill site at Beddington, Sutton is licensed for the lifetime of this Plan and is therefore safeguarded under Proposed Policy WP3.

Table 3.9: Proposed Policy WP3: Existing waste management sites

Proposed Policy WP3: Existing waste management sites
Existing waste management sites will be safeguarded for their existing permitted level of use.
If, for any reason, a site is lost to non-waste use, additional compensatory site provision will be provided.

Your feedback is sought on this Proposed Policy and its supporting text. Please provide your feedback using the questionnaire which appears at the end of this document.
Policy Issue 4: Identifying proposed waste management sites

Background

3.21 In the final South London Waste Plan, Proposed Policy WP4 will identify the sites to be allocated to the development of waste management facilities. In this Consultation Document, the final sites to be allocated have not yet been identified and instead, we seek your views on potential sites. Section 2 of this Consultation Document identifies how sites have been assessed and how the potential sites have been identified for this Document.

3.22 During the September 2008 Issues and Options consultation, we also sought feedback on the kinds of issues which need to be considered when choosing appropriate locations. Feedback identified that all the draft locational criteria consulted on are important. Local stakeholders were particularly keen to ensure that waste management facilities have no negative impacts on local communities and the environment.

Alternative Policy options

3.23 Proposed Policy WP4 satisfies the requirements of Planning Policy Statement 10: Sustainable Waste Management and the Mayor's London Plan to identify sufficient sites to meet the apportionment of waste identified in the London Plan. By allocating sufficient sites to enable the development of sufficient facilities to exceed the apportionment, Proposed Policy WP4 also supports the Vision of the Plan which seeks to have sufficient facilities in place by 2021 to meet the needs of our communities, in appropriate locations.

3.24 Proposed Policy WP4 is therefore considered to be the only realistic approach to allocating sufficient sites to meet the requirements and identified needs of the evidence base.

Table 3.10: Proposed supporting text to Policy WP4: Proposed sites for new/enhanced waste management facilities

Planning Policy Statement 10: Sustainable Waste Management requires the South London Waste Plan to identify sites and areas suitable for new or enhanced waste management facilities, in accordance with the broad locations identified in the Mayor's London Plan.

London Plan Policy 4A.27 identifies the broad locations suitable for recycling and waste treatment facilities as strategic industrial locations, local employment areas and existing waste management sites. These categories formed our area of search for sites. Additional sites were also identified through the 2008 consultation.

London Plan Policy 4A.23 identifies a number of criteria to be used in identifying sites. These have been used in the site assessment process which has supported the identification of sites within Proposed Policy WP4. The site assessment process is available in the accompanying Technical Report. Proposed Policy WP4 identifies those sites which are most suitable for the development of new and/or enhanced future waste management facilities. Some sites within this policy are existing sites already in waste management use, whilst some are new sites.

To ensure there is no loss of existing waste management capacity, London Plan Policy 4A.24 encourages boroughs to ensure that re-development of existing waste sites involves maximising their potential. Proposed Policy WP4 addresses this issue and is therefore supportive of the London Plan.

To identify the number of sites which need to be allocated to waste management within the Plan area, Table 4A.7 of the London Plan (2008) has been used to translate the quantity of waste identified as the 'capacity gap' into the required land take for facilities. Using this calculation, we have identified a need to allocate 20 hectares of land for waste management facilities. The sites which are eventually identified within Policy WP4 will identify sufficient land area to meet this requirement.
Table 3.11: Proposed Policy WP4: Proposed sites for new/enhanced waste management facilities

Proposed Policy WP4: Proposed sites for new / enhanced waste management facilities
Planning permission will be granted for waste management facilities on the sites eventually identified under Policy WP4.

To ensure no loss in existing capacity, re-development of any existing waste sites must ensure that the quantity of waste to be managed following re-development is equal to, or greater than, the quantity of waste which the site is currently permitted for.

If, for any reason, a site eventually identified in this policy is lost to non-waste use, additional compensatory site provision will be provided.

Your feedback is sought on this Proposed Policy and its supporting text. Please provide your feedback using the questionnaire which appears at the end of this document.

Policy Issue 5: Managing the development of waste management facilities on unallocated sites

Policy background

3.25 During the Issues and Options consultation stage, feedback was sought on the criteria to be used to assess the suitability of sites for waste management facilities.

3.26 The criteria identified at the Issues and Options stage, together with feedback received has identified a long list of criteria against which all potential sites have been objectively assessed (see Section 2 for a description of how sites have been assessed).

3.27 The criteria used to assess the potential sites have been identified in Proposed Policy WP5, to ensure that proposals coming forwards on sites not allocated under Proposed Policy WP4 undergo the same rigorous approach as those potential sites which will be eventually identified in Proposed Policy WP4.

Table 3.12: Proposed supporting text to Proposed Policy WP5: Waste related development on unallocated sites

Proposals for waste management development might come forwards on sites which are not allocated in this Plan for the development of waste management facilities. Proposed Policy WP5 seeks to ensure that where this occurs, development is appropriate to the site in question.

Annex E of Planning Policy Statement 10 (Sustainable Waste Management) and Policy 4A.23 of the Mayor’s London Plan identify a wide range of factors which need consideration when locating waste management facilities. Together, these factors aim to deliver the key planning objectives of PPS10 which require planning authorities to deliver a strategy which helps secure the recovery or disposal of waste without endangering human health, without harming the environment and which protect green belts, but recognises the particular locational needs of some types of waste management facilities. The requirements of Annex E and Policy 4A.23 of the London Plan are reflected in Proposed Policy WP5.

An objective site selection process has been carried out to identify the proposed sites which will eventually be identified in Proposed Policy WP4. These are considered to be the most suitable sites for the development of new / enhanced waste facilities and the partner boroughs would like to development on these sites before other sites are considered. Proposed Policy WP5 therefore requires developers to consider the sites which will eventually be identified in Proposed Policy WP4, first.
Proposed Policy WP5: Waste related development on unallocated sites

Proposals for waste facilities on unallocated sites will be considered and planning permission granted provided the proposed development:

1. Can demonstrate that it is not feasible to develop the proposed facility on one of the preferred sites identified in Policy WP4, and;
2. Can demonstrate a need for the development, in accordance with Policy WP1, and;
3. Can demonstrate there are no significant adverse impacts to people, the environment or natural resources by meeting Policy WP6, and;
4. Meets Policy WP7 where applications are for facilities capable of producing energy, and;
5. That the proposed site meets the following locational criteria:
6. The site is not within, or partly within, nature conservation areas protected by current international and national policy, and;
7. The site does not contain features identified as being of International and National historic importance.

Priority will be given to:

8. previously developed land
9. sites designated by the Plan area's local planning authorities as suitable for industrial development in their planning policy documents
10. sites identified by current assessments as having a low risk of flooding
11. sites which do not impact on the openness of strategic open land (e.g. Green Belt and Metropolitan Open Land)
12. sites falling outside the perimeters of land designated by the Plan area's local planning authorities as open space or used for recreation purposes or similar
13. sites in the Environment Agency's Source Protection Zone 3 (i.e. sites furthest from protected aquifers)
14. sites which have direct access to the strategic road network
15. sites which contain no known archaeological features
16. sites where materials entering and leaving the site can be transported by rail or means of sustainable transport
17. sites which offer opportunities to accommodate various related facilities on a single site
18. Sites which are close to identified users of heat that would be produced by any thermal treatment facilities.

Your feedback is sought on this Proposed Policy and its supporting text. Please provide your feedback using the questionnaire which appears at the end of this document.
**Policy Issue 6: Development criteria which proposals will need to satisfy**

**Policy background**

3.28 During the 2008 Issues and Options, local stakeholders identified concerns about the impact of waste management development and local stakeholders were particularly keen to ensure that waste management facilities have no negative impacts on local communities and the environment.

**Alternative Policy options:**

3.29 Proposed Policy WP6 addresses the requirements of the Mayor's London Plan and Planning Policy Statement 10: Sustainable Waste Management which seek to secure the recovery and/or disposal of waste without endangering human health and without harming the environment.

**Table 3.14: Proposed Supportive text to Policy WP6: Development Criteria**

<table>
<thead>
<tr>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Waste Framework Directive and Planning Policy Statement 10: Sustainable Waste Management require the necessary measures to be taken to ensure waste management is carried out without endangering human health and without harming the environment.</td>
</tr>
<tr>
<td>All planning applications for waste management facilities will need to demonstrate that there will be no significant adverse effects arising from development and applications are expected to include details of whether any significant adverse impact identified can be controlled to acceptable levels. Although pollution prevention and control is primarily the responsibility of the Environment Agency, adequate pollution control technology is expected to be installed and operated and best practice on site management and operations should be included with the planning application, as poor site management can lead to adverse amenity and environmental impacts. Applications should also identify adequate monitoring and safeguard arrangements appropriate to the proposal's location, to minimise the risk of problems occurring in the future.</td>
</tr>
<tr>
<td>The construction and operation of waste management facilities should not give rise to an unacceptable impact on the amenity of residents, or on the local and wider environment. Sufficient information from applicants will therefore be required to ensure adequate protection of these interests before granting planning permission.</td>
</tr>
<tr>
<td>Consideration of traffic generation characteristics will incorporate an assessment of the level and type of traffic generated and the impact of that traffic. This assessment will identify opportunities for use of sustainable transport modes, the suitability of access and the highway network in the vicinity of the site, including access to and from the primary route network, and works necessary to accommodate the development.</td>
</tr>
<tr>
<td>Residual wastes will arise from waste management facilities. These wastes will need to be managed and these management details are expected to be included with the planning application.</td>
</tr>
<tr>
<td>In assessing applications, due regard will be paid to prevailing national policy and guidance appropriate both to the areas and features of acknowledged importance and to the proposed means of dealing with waste. Consideration will also be given to relevant aspects of relevant Local Development Frameworks in Croydon, Kingston, Merton and Sutton.</td>
</tr>
<tr>
<td>Developers are encouraged to contact the appropriate partner borough prior to submission of a planning application to discuss all relevant matters.</td>
</tr>
</tbody>
</table>
Table 3.15: Proposed Policy WP6: Development Criteria

The proposed policy WP6: Development criteria
Planning permissions for waste related development will be granted where it can be demonstrated that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.

The information supporting the planning application must include an assessment of the following matters for the entire operation of the facility and, where necessary, appropriate mitigation should be identified so as to minimise or avoid any significant adverse impact:

1. The impact of development on amenity including visual intrusion, transport, noise, fumes, vibration, glare, litter, odour and vermin and birds
2. The impact of development on green belt, metropolitan open land, recreation land or similar land
3. The impact of the release of substances to the atmosphere (including dust) or land arising from facilities and transport
4. The impact of greenhouse gases produced
5. The impact of development on the biological diversity of flora and fauna and their respective habitats at the site or on adjoining land including linear or other features which facilitate the dispersal of species
6. The impact of development on archaeological sites, the historic environment and built heritage (including conservation areas)
7. The impact of development on ground water (including stores) and surface water
8. The impact of development on traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network
9. How the design of the facility has considered and conforms to the best design standards available at the time of the application

Your feedback is sought on this Proposed Policy and its supporting text. Please provide your feedback using the questionnaire which appears at the end of this document.

Policy Issue 7: The governance of sustainable, modern energy recovery where appropriate

Policy background
3.30 In our ‘Issues and Options’ consultation, we sought feedback about how the Waste Plan should support the production of energy from waste. On the question of whether the Plan ought to support the production of energy from waste facilities, there was general consensus across all stakeholder groups for supporting the production of energy. The Mayor’s London Plan also encourages the provision of combined heat and power and/or combined cooling, heat and power where possible.

Alternative Policy options
3.31 It is considered that the Proposed Policy WP7 is the only realistic approach to enable the Plan to address the evidence base on this issue. Therefore the partner boroughs consider there are no realistic alternative options to this Policy.
Whilst Policy WP1 seeks to ensure that waste is managed as high up the waste hierarchy as possible, energy recovery facilities are likely to play an important dual role in both the future management of London's waste and the future provision of London's energy needs.

The development of low carbon energy facilities, including those using waste as a fuel, have a significant role in helping to secure progress against the UK's carbon reduction targets by not only reducing the quantity of waste sent to landfill and thereby reducing the emission of climate changing gases from landfill but by also reducing the need to extract and burn virgin fossil fuels to produce energy.

As thermal treatment is lower in the waste hierarchy than other waste management options, important checks have been included in Policy WP7. Firstly, it has to be demonstrated that the waste cannot practically and reasonably be reused, recycled or processed to recover materials. This requirement will ensure that the thermal treatment plant does not ‘crowd out’ the potential for recycling or otherwise gaining benefit from the waste prior to its thermal treatment.

Policy WP7 supports the London Mayor’s Energy Strategy and its objectives of improving energy efficiency and increasing the proportion of energy used generated from renewable sources as well as supporting the partner borough's energy strategies. Policy WP7 also supports national Planning Policy Statement 1 which requires development to be planned to limit carbon dioxide emissions and to make good use of opportunities for decentralised and renewable production of low carbon energy.

Some waste management treatment options are able to provide heat and power. Advanced thermal treatment (or advanced conversion) technologies including anaerobic digestion, gasification and pyrolysis are particularly supported in the London Plan. These provide opportunities for local renewable energy generation supported by the Renewables Obligation Certificates system and the Government’s Energy White Paper.

Where waste treatment processes are capable of producing heat and power, this is encouraged. Furthermore, the use of such heat and power by local users proximate to the source of energy production is encouraged.

With regard to technologies, those with lower carbon dioxide equivalent emissions are preferred and applications are required to assess the energy demand and carbon dioxide emissions from the proposed development. This supports the London Plan’s preference for advanced conversion techniques including anaerobic digestion, gasification and pyrolysis.

All boroughs are firmly against poor performing, outdated technologies such as old-fashioned mass-burn incineration which is poorly designed, visually intrusive and releases high levels of noxious emissions.

**Table 3.16: Proposed Supportive text to Policy WP7: Sustainable, modern energy recovery**

Where waste cannot be managed further up the waste hierarchy (i.e. reused, recycled or composted), preference will be given to those proposals with a lower carbon output to ensure the best environmental outcomes. Preference will be give to advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis.

Any thermal treatment facilities must allow for the recovery of energy from the waste. The potential efficiency of proposals will need to be considered and developers will be expected to assess the energy demand and carbon dioxide equivalent emissions over the lifetime of the proposal.

All boroughs are firmly against poor performing, outdated technologies such as old-fashioned mass-burn incineration which is poorly designed, visually intrusive and releases high levels of noxious emissions.

**Table 3.17: Proposed Policy WP7: Sustainable, modern energy recovery**

Where waste cannot be managed further up the waste hierarchy (i.e. reused, recycled or composted), preference will be given to those proposals with a lower carbon output to ensure the best environmental outcomes. Preference will be give to advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis.

Any thermal treatment facilities must allow for the recovery of energy from the waste. The potential efficiency of proposals will need to be considered and developers will be expected to assess the energy demand and carbon dioxide equivalent emissions over the lifetime of the proposal.

All boroughs are firmly against poor performing, outdated technologies such as old-fashioned mass-burn incineration which is poorly designed, visually intrusive and releases high levels of noxious emissions.
Planning permission will be granted for waste to energy processes provided:
(1) The waste identified for treatment cannot practically or reasonably be managed further up the waste hierarchy, and;
(2) Provision will be made for the facility to produce electricity and heat or electricity, heat and cooling;
(3) That heat and power will be available to local users, proximate to the source of the energy production, unless the applicant can demonstrate there is no current or prospective demand.

**Your feedback is sought on this Proposed Policy and its supporting text. Please provide your feedback using the questionnaire which appears at the end of this document.**

**Delivery of the South London Waste Plan**

3.32 Implementation of the policies within the South London Waste Plan will require the partner boroughs to work with a range of partners to deliver appropriate waste management facilities within the Plan area.

3.33 Key partners will be the waste management industry and the South London Waste Partnership. The South London Waste Partnership is responsible for procuring contracts to treat the partner boroughs' municipal waste and for implementing waste minimisation strategies. 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.

**Table 3.18: Proposed monitoring regime for Proposed Policy WP1: The Strategic Approach**

<table>
<thead>
<tr>
<th>Policy References</th>
<th>Monitoring Indicators</th>
<th>Targets</th>
<th>Reporting mechanism</th>
</tr>
</thead>
<tbody>
<tr>
<td>LDF: WP1: The Strategic Approach</td>
<td>(1) The number, site area (ha) and annual capacity (tonnes) of new licensed waste facilities by type and waste stream</td>
<td>(1) Borough target: to permit sufficient development to manage the equivalent of the Plan area's commercial, municipal and industrial waste arisings</td>
<td>LDF: Annual Monitoring Report</td>
</tr>
<tr>
<td>London Plan policies:</td>
<td>(2) Quantity of waste, by waste stream, produced within the Plan area</td>
<td>(2) London Plan target:: to meet the boroughs' combined waste apportionment of 854ktpa by 2010; 1.1 million tpa by 2015 and 1.3 million tpa by 2020</td>
<td>Boroughs: Municipal waste arisings data and recycling rates reported annually</td>
</tr>
<tr>
<td>4A.26: Numbers and types of recycling and waste treatment facilities</td>
<td>(3) Forecasts for waste arisings, by waste stream, within the Plan area</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(4) The amount of land allocated to waste management still available</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(5) The length of time each site has remained un-developed(</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **London Plan policies:** 4A.21: Waste Strategic Policy & targets | (3) Borough targets: to recycle / compost 50% of municipal waste by 2020  
(4) London Plan targets: To recycle / compost 35% of municipal waste by 2010 and 45% by 2015  
(5) London Plan target: Achieve recycling/re-use levels of 95% by 2020 for construction, demolition & excavation waste  
(6) London Plan target: Achieve recycling/composting levels of 70% by 2020 for commercial and industrial waste  
(7) London Plan target: Net increase in the proportion of London residents working in jobs in London over the plan period | (6) London Plan target: Achieve recycling/composting levels of 70% by 2020 for commercial and industrial waste |
| (7) The proportion of municipal waste arisings recycled / composted | (8) The proportion of construction, demolition and excavation waste arisings recycled / re-used | (7) The proportion of construction, demolition and excavation waste arisings recycled / re-used |
| **4A.21: Waste Strategic Policy & targets** | (9) The proportion of commercial and industrial waste arisings recycled / composted | (10) The number of local jobs created through permitting waste management development |
| **LDF:** WP1: The Strategic Approach | (10) The number of local jobs created through permitting waste management development | (7) London Plan target: Net increase in the proportion of London residents working in jobs in London over the plan period |

Your feedback is sought on this proposed monitoring regime. Please provide your feedback using the questionnaire which appears at the end of this document.
<table>
<thead>
<tr>
<th>Policy References</th>
<th>Monitoring Indicators</th>
<th>Targets</th>
<th>Reporting mechanism</th>
</tr>
</thead>
<tbody>
<tr>
<td>LDF: WP2: Waste Minimisation</td>
<td>(2) Quantity of waste, by waste stream, produced within the Plan area</td>
<td>(7) Borough target: to reduce the amount of household waste collected within the Plan area to an average of 225kg per person by 2020</td>
<td>LDF: Annual Monitoring Report</td>
</tr>
<tr>
<td></td>
<td>(3) Forecasts for waste arisings, by waste stream, within the Plan area</td>
<td></td>
<td>Boroughs: Municipal waste arisings data and recycling rates reported annually</td>
</tr>
<tr>
<td>London Plan policies: 4A.21: Waste Strategic Policy &amp; targets</td>
<td>(8) The proportion of construction, demolition and excavation waste arisings recycled/re-used</td>
<td>(5) London Plan target: Achieve recycling/re-use levels of 95% by 2020 for construction, demolition &amp; excavation waste</td>
<td></td>
</tr>
<tr>
<td>LDF: WP2: Waste Minimisation</td>
<td>(11) The proportion of re-used and recycled materials in new developments</td>
<td>At least 25% of the total value of materials or products used are re-used or recycled and locally sourced, where feasible</td>
<td></td>
</tr>
<tr>
<td>LDF: WP2: Waste Minimisation</td>
<td>(12) The number of waste related developments qualifying for high sustainability ratings against current sustainable design and construction standards e.g. the BREEAM (Building Research Establishment Environmental Assessment Method)</td>
<td>Sutton borough target: 100% of major non residential developments to achieve a rating of 'excellent' and to achieve the 'zerocarbon' standard by 2017.</td>
<td></td>
</tr>
</tbody>
</table>

Your feedback is sought on this proposed monitoring regime. Please provide your feedback using the questionnaire which appears at the end of this document.
<table>
<thead>
<tr>
<th>Policy References</th>
<th>Monitoring Indicators</th>
<th>Targets</th>
<th>Reporting mechanism</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Plan Policy: 4A.23 Criteria for the selection of sites for waste management and disposal</td>
<td>(1) The number, site area (ha) and annual capacity (tonnes) of new licensed waste facilities by type and waste stream</td>
<td>London Plan Target: London boroughs should identify sites and allocate sufficient land for waste management and disposal, employing the locational criteria identified in Policy 4A.23.</td>
<td>LDF: The Annual Monitoring Report</td>
</tr>
<tr>
<td>London Plan Policy: 4A.24 Existing provision-capacity, intensification, re-use and protection</td>
<td>(11) The quantity of land safeguarded for waste management development</td>
<td>London Plan Target: boroughs should protect existing waste sites and facilitate the maximum use of existing waste sites, particularly waste transfer facilities and existing landfill sites.</td>
<td></td>
</tr>
<tr>
<td>London Plan Policy: 4A.25 Borough level apportionment of municipal and commercial/industrial waste to be managed</td>
<td></td>
<td>London Plan Target: boroughs should identify sufficient land to provide capacity to manage the apportioned tonnages of waste. Boroughs preparing joint waste DPDs may wish to collaborate by pooling their apportionment requirements.</td>
<td></td>
</tr>
<tr>
<td>London Plan Policy: 4A.27 Broad locations suitable for recycling and waste treatment facilities</td>
<td></td>
<td>London Plan Target: Boroughs should identify adequate provision...the broad locations for these facilities are: SILs, Local Employment Areas and Existing Waste Management Sites.</td>
<td></td>
</tr>
</tbody>
</table>

Your feedback is sought on this proposed monitoring regime. Please provide your feedback using the questionnaire which appears at the end of this document.
Table 3.21: Proposed monitoring regime for Proposed Policy WP5: Waste related development on unallocated sites

<table>
<thead>
<tr>
<th>Policy References</th>
<th>Monitoring Indicators</th>
<th>Targets</th>
<th>Reporting mechanism</th>
</tr>
</thead>
<tbody>
<tr>
<td>LDF: WP4: Waste related development on unallocated sites</td>
<td>(12) The land use designations upon which development on unallocated sites has been permitted</td>
<td>London Plan Target: London boroughs should identify sites and allocate sufficient land for waste management and disposal, employing the locational criteria identified in Policy 4A.23.</td>
<td>LDF: The Annual Monitoring Report</td>
</tr>
<tr>
<td>London Plan Policy: 4A.23 Criteria for the selection of sites for waste management and disposal</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Your feedback is sought on this proposed monitoring regime. Please provide your feedback using the questionnaire which appears at the end of this document.

Table 3.22: Proposed monitoring regime for Proposed Policy WP6: Development Criteria

<table>
<thead>
<tr>
<th>Policy References</th>
<th>Monitoring Indicators</th>
<th>Targets</th>
<th>Reporting mechanism</th>
</tr>
</thead>
</table>
| LDF: WP5: Development criteria | Emissions of the following (by source):  
- NOx
- SO2
- PM10
- Other pollutants of public concern (dioxins and furans, PCBs)
- Greenhouse gases  
Number and site area of permissions granted in AQMA.  
Number and site area of permissions granted contrary to advice of EA on topic of air quality.  
Number and site area of permissions granted within a source protection zone or contrary to advice of EA on grounds of water quality. | To ensure all applications for waste management facilities provide adequate and relevant information to fully consider the proposed development. | LDF: The Annual Monitoring Report                         |
| London Plan Policy: 4A.23 Criteria for the selection of sites for waste management and disposal |                                                                                        |                                                                                           |                                                          |
| Water quality downstream from facilities where planning permission has been granted contrary to objection of EA. |
| Number and site area of permissions granted contrary to advice of EA on the topic of surface water quality downstream of site. |
| Number of permissions including SuDS installation. |
| Estimated water consumption requirement of permitted development 1 |
| Number and site area of permissions granted in land liable to flood contrary to advice of EA |
| Estimated tonne-kilometre travelled by waste and/or compared to estimated total kilometres of permitted development. |
| Permitted number of vehicle movements |
| Number and type of facilities permitted contrary to advice from consultees (eg. County Ecologist, Rights of Way Department, BAA, EA, NE etc). |

Your feedback is sought on this proposed monitoring regime. Please provide your feedback using the questionnaire which appears at the end of this document.
### Table 3.23: Proposed monitoring regime for Proposed Policy WP7: Sustainable, modern energy recovery

<table>
<thead>
<tr>
<th>Policy References</th>
<th>Monitoring Indicators</th>
<th>Targets</th>
<th>Reporting mechanism</th>
</tr>
</thead>
</table>
| LDF: WP6: Energy recovery from waste | Number of applications permitted and record of:  
- type of facility;  
- waste type(s) handled;  
- capacity of facility (annual throughput); and  
- expected type and quantity of residual waste(s)  
Record of pre-treatment undertaken.  
Source of waste by quantity and type and destination of recovered materials and residues.  
MW of energy to be generated by permitted development. | To enable thermal treatment facilities to be provided if necessary as part of an integrated waste management infrastructure.  
To ensure waste going to thermal treatment facilities cannot be practically and reasonably managed further up the waste hierarchy.  
To ensure that where waste treatment processes are able to produce energy, power is made available to local users. | Annual Monitoring Report |
Questionnaire

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

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

Sites

**Q1a** Table 2.2 of the Consultation Document identifies existing waste sites considered to have potential for re-development as waste management facilities.

**Do you agree that these sites are broadly suitable for the re-development of waste facilities?**

Yes [ ] No [ ]

**Q1b** Do you have any specific comments to make about any site identified in Table 2.2?

Yes [ ] Site number/s: [ ] [ ] [ ] [ ]

Please comment: ____________________________________________
___________________________________________________________
___________________________________________________________

No [ ]

**Q2a** Table 2.3 of the Consultation Document identifies an existing waste site considered to have deliverability constraints and is therefore unsuitable for re-development as waste management facilities.

**Do you agree with the deliverability constraints identified for the site in Table 2.3?**

Yes [ ] No [ ]

**Q2b** Do you have any specific comments to make about the site identified in Table 2.3?

Yes [ ]

Please comment: ____________________________________________
___________________________________________________________
___________________________________________________________

No [ ]
### Q3a
Table 2.4 of the Consultation Document identifies top scoring new sites considered to have opportunity for developing waste management facilities.

**Do you agree that these sites are broadly suitable for the re-development of waste facilities?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

### Q3b
Do you have any specific comments to make about any site identified in Table 2.4?

<table>
<thead>
<tr>
<th>Yes</th>
<th>Site number/s:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Please comment:**

---

### Q4a
Table 2.5 of the Consultation Document identifies top scoring new sites considered to have deliverability constraints and therefore unsuitable for developing waste management facilities.

**Do you agree with the deliverability constraints identified for the sites in Table 2.5?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

### Q4b
Do you have any specific comments to make about any site identified in Table 2.5?

<table>
<thead>
<tr>
<th>Yes</th>
<th>Site number/s:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Please comment:**

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No
Q5a  Table 2.6 of the Consultation Document identifies Industrial estates which generally score well and are expected to have some deliverable areas.

Do you agree that these sites are likely to contain areas broadly suitable for the re-development of waste facilities?

Yes  No

Q5b  Do you think the South London Waste Plan should allocate specific sites within the Industrial areas for waste management?

Yes  No

If yes, please use the figures overleaf to identify which areas you feel should be allocated to waste management

Do you have any specific comments to make about any site identified in Table 2.6?

Yes  Site number/s:  

Please comment: 

Site 102: Purley Way, Lysander Road and Imperial Way Industrial Area, Croydon

Site 351: Chessington Industrial Estate, Kingston

If answering yes, to Q5b, please use the following figures to identify specific areas of the industrial estates you feel should be allocated to waste management:
If answering yes, to Q5b, please use the figures below to identify specific areas of the industrial estates you feel should be allocated to waste management:

Site 352: Chessington Industrial Estate, Kingston
Site 353: Chessington Industrial Estate, Kingston

Site 642: Durnsford Road Industrial Area, Merton
Site 69: Willow Lane Industrial Estate

Site 491: Kimpton Industrial Estate, Land North of Minden Road, Merton
If answering yes, to Q5b, please use the figures below to identify specific areas of the industrial estates you feel should be allocated to waste management:

Sites 5312, 532, 533, 534, 535, 539: Beddington Farmlands, Sutton

Policies

Q6  As discussed in Section 2 of the Consultation Document, almost 140 sites have been assessed. Only those considered to have some potential, or those which have scored well but where deliverability constraints have been identified, are presented in this Consultation Document.

The assessment for all sites is available online and in the accompanying Technical Report. We welcome your views on all sites. We encourage you to comment on these other sites by visiting http://southlondonwasteplan.limehouse.co.uk or contacting the Project Manager, whose details appear in this document.

Do you have any comments about any other site assessed for the South London Waste Plan?

Please provide the site number and describe your reasons why this / these are particularly suitable or unsuitable.

_________________________________________________________

_________________________________________________________

_________________________________________________________

_________________________________________________________
Q7 Are there any other sites, not already identified that you think would be suitable for waste management facilities?

*Please describe the site location and the reasons why you think this is suitable for a waste management facility. Please include a site map if possible.*

Q8 Proposed Policy WP1: The Strategic Approach, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with this policy?

Yes [ ] No [ ]

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment: ____________________________________________

Q9 Proposed Policy WP2: Waste minimisation, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with this policy?

Yes [ ] No [ ]

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment: ____________________________________________
Q10  Proposed Policy WP3: Existing waste management sites, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with this policy?

Yes ☐ No ☐

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment: ____________________________________________________________
__________________________________________________________
__________________________________________________________
__________________________________________________________

Q11  Proposed Policy WP4: Proposed sites for new / enhanced waste management facilities, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with this policy?

Yes ☐ No ☐

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment: ____________________________________________________________
__________________________________________________________
__________________________________________________________
__________________________________________________________

Q12  Proposed Policy WP5: Waste related development on unallocated sites, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with the content of this policy, or would you prefer to see higher standards for waste sites? If so, what should these higher standards be?

Yes ☐ No ☐

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment: ____________________________________________________________
__________________________________________________________
__________________________________________________________
__________________________________________________________
Q13  Proposed Policy WP6: Development criteria, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with the content of this policy, or would you prefer to see higher standards for waste sites? If so, what should these higher standards be?

Yes  No

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment:

Q14  Proposed Policy WP7: Sustainable, modern energy recovery, its justifying text and monitoring regime are identified in the Consultation Document. Do you agree with this policy?

Yes  No

Do you have any further comments, or comments on the proposed policy’s supporting text or monitoring regime?

Please comment:

Q15  Do you have any other comments about any other aspect of the South London Waste Plan?

Yes  No

Please comment:

________________________________________________________________________

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________________________________________________________________________
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 or Email: southlondonwasteplan@rbk.kingston.gov.uk

Please help us to check that we are reaching all sections of the community by providing the optional details.

Data Protection All information is confidential and will only be used under the strict controls of the Data Protection Act 1998.

Male/Female

Age 10-15 16-25 26-35 36-55 56-65 66+

Do you consider that you have a disability? Yes/No if yes what is the nature of your disability?

Please circle the ethnic group that best applies to you:

White, British | White, Irish | White, Other | Black Caribbean | Black African | Black, British, Other | Black, Other | Mixed, White and Black Caribbean | Mixed, White and Black African | Mixed, White and Asian | Mixed, Other | Asian or Asian British, Indian | Asian or Asian British, Bangladeshi | Chinese

Other (please specify)

Don’t know / Don’t want to answer