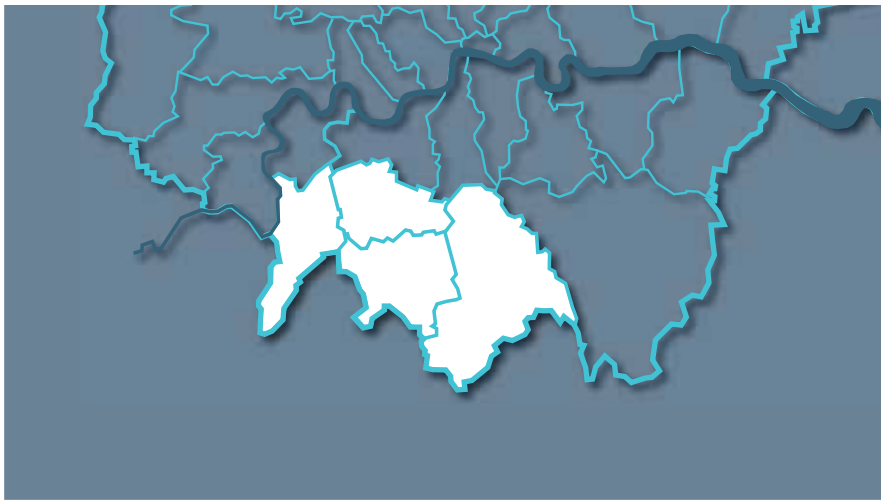
- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London **Waste Plan**

Sustainability Appraisal (SA)

incorporating Strategic Environmental Assessment (SEA)

on Draft for Submission to Government

September 2020

CROYDON
www.croydon.gov.uk

THE ROYAL BOROUGH OF KINGSTON UPON THAMES

merton

Sutton

Executive Summary

This SA Report on the draft South London Waste Plan (SLWP) Submission Version provides a comprehensive review of current and future waste arisings within the plan area; existing waste management sites, throughput and capacity; national, sub-regional and local policies; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the proposed policies and safeguarded waste sites on each of the sustainability objectives making up the SA Framework. The SA Report is accompanied by an Equalities Impact Assessment (EqIA) report and Habitats Regulations Assessment (HRA) screening.

The report meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in national planning practice guidance and the SEA regulations respectively, and has been published to inform public consultation on the draft SLWP Submission Version from 4 September to 22 October (Regulation 19 consultation). It builds upon the SA Scoping Report and the SA Report on the SLWP Issues and Preferred Options document published for public consultation in October 2019 and takes account of representations received.

The SA Matrix in Section 12 demonstrates that draft Policies WP1-WP10, which have been developed by the four partner boroughs as the proposed strategy for the new SLWP for 2021-36 (Option 1), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

Overall, the most important sustainability benefits of the preferred strategy include:

- promoting **net self-sufficiency** within South London;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings;
- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in the plan area;
- minimising **air pollution** and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network;
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery**;
- helping to secure the transition to a **circular economy** within south London; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste uses.

Further stakeholder feedback arising from consultation will inform the preparation of the final plan to be submitted to the Government.

Contents

1. Introduction

Purpose of the new South London Waste Plan

1.1 The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21[1] introduced in 2012.

1.2 The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the draft London Plan up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy (see below), promote the circular economy and minimise any adverse impacts on nearby land uses and the local environment.

1.3 A new plan is needed from 2021 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaborative working at the sub-regional level is essential for effective waste planning.

1.4 Figure 1.1. shows the geographical coverage of the four partner boroughs.

Figure 1.1: The South London Waste Plan area

[1] the current South London Waste Plan 2012 is available at https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view

1.5 Following public consultation on an Issues and Preferred Options document and accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation[2]), a draft version of the SLWP 2021-36 (the draft plan) has been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public. The draft plan, which incorporates a number of changes made in the light of representations received and changing circumstances, has now been published for further consultation in accordance with Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012. The draft plan safeguards 46 existing sites for waste treatment and identifies ten development management policies to guide waste treatment within the four boroughs over the next 15 years.

1.6 This sustainability appraisal (SA) report, incorporating strategic environmental assessment (SEA), Equalities Impact Assessment (EqIA) and Habitats Regulations Screening, has been published for public consultation alongside the draft plan.

National planning policy requirements

1.7 The National Planning Policy for Waste[3] (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:

- undertaking early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial;
- driving waste management up the Government's waste hierarchy (see Figure 1.2), recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal;
- in particular, identifying the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (in London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans);
- considering the need for additional waste management capacity of more than local significance and reflecting any requirement for waste management facilities identified nationally;
- taking into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required;
- working collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management; and
- considering the extent to which the capacity of existing operational facilities would satisfy any identified need.

[2] under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
[3] the NPPW is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

Figure 1.2: The Waste Hierarchy

London Plan Apportionment targets

1.8 The Intend to Publish London Plan (GLA, December 2019)[4] includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):

- the equivalent of 100% of London's waste managed within London (i.e. net self-sufficiency) by 2026 for all waste streams except excavation waste;
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

1.9 New apportionment targets are set for each borough in order to meet the net self-sufficiency target for local authority collected waste (LACW) and for commercial and industrial (C&I) waste. Table 1.1 sets out the combined apportionment targets for South London for 2021 and at the end of the plan period in 2041.

Table 1.1: Apportionment targets for South London in the Intend to Publish London Plan 2019

Borough	Apportionment (tonnes per annum)	
	2021	2041
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
Total	**887,000**	**944,000**

Requirement for Sustainability Appraisal

1.10 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal (SA) in the preparation of all development plan documents (DPDs) forming part of the local development plan, including local waste plans. SAs should incorporate the requirements of the UK Strategic Environmental Assessment (SEA) Regulations 2004, which implement the requirements of the EU SEA Directive 2001/42/EC. The purpose of SA is to ensure a high level of protection of the environment as part of the preparation of certain plans and programmes.

[4] the Intend to Publish London Plan 2019 is available at https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019

What is sustainable development?

1.11 The UK Sustainable Development Strategy (ODPM[5], 2005) defines sustainable development as *"enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations".* The Strategy is based on the following guiding principles:

(1) Living within Environmental Limits
Respecting the limits of the planet's environment, resources and biodiversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.

(2) Ensuring a Strong, Healthy and Just Society
Meeting the diverse needs of all people in existing and future communities, promoting personal well being, social cohesion and inclusion and creating equal opportunity for all.

(3) Achieving a Sustainable Economy
Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them, and efficient resource use is incentivised.

(4) Using Sound Science Responsibly
Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

(5) Promoting Good Governance
Actively promoting effective, participative systems of governance in all levels of society, engaging people's creativity, energy and diversity.

1.12 In seeking to regulate the development and use of land in the public interest, planning is key to achieving sustainable development by promoting environmental, economic and social objectives together over time. The revised National Planning Policy Framework (NPPF) (MHCLG, February 2019) defines the purpose of planning as follows:

- **economic** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **social** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;
- **environmental** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

[5] [5] the former Office for the Deputy Prime Minister

Purpose of sustainability appraisal

1.13 SA is integral to the preparation and development of all DPDs, including local waste plans. Its purpose is to promote the aims of sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The relationship between the SA and plan preparation processes is shown in Figure 1.3.

1.14 SA reports on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development. By identifying key issues, developing policies and proposals and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable plans which are evidence-based. In the context of waste planning, the appraisal process can help planners and the public gain a better understanding of how well-designed waste facilities in the right locations can deliver long-term benefits for local environmental quality, promoting the circular economy and community well-being.

1.15 To be effective, SA must be

- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- **Objectives-led:** the direction of desired change has measurable targets;
- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

1.16 The SA process also provides the means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

1.17 At the conclusion of the plan-making process, the final SA Report should describe how the adopted plan has addressed the sustainability agenda and the choices that have been made between alternative policies and proposals. This will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.

Consultation on SA Scoping Report

1.18 In order to meet the requirements of the SEA Directive and procedures for community engagement on local plan and SA documents set out in the statutory regulations and respective Statements of Community Involvement (SCI), an initial SA Scoping Report for the new SLWP was published over a five week period from **16 September until 21 October 2019** in order to seek the views of relevant bodies, namely the Environment Agency (EA), Natural England and Historic England, on the proposed scope of the appraisal.

1.19 Its purpose was to define the scope of the appraisal and provide the basis for appraising the potential effects of alternative waste management policies against a comprehensive range of environmental, social and economic criteria. The sustainability objectives, indicators and targets making up the proposed SA Framework were shaped by the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning policies within each of the four boroughs.

1.20 Responses to consultation on the SA Scoping Report were received from the Environment Agency (28 October 2019); Historic England (21 October 2019); and Natural England (17 October 2019). and the comments received have been incorporated within this SA Report. All representations received on the SA Scoping Report (and on the subsequent SA Report on SLWP Issues and Preferred Options) and how they have been addressed are set out in Appendix 3.

Consultation on SA Report on SLWP Issues and Preferred Options

1.21 Following extensive evidence gathering work, culminating in the production of a Technical Paper[6] by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report (see above), an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019. Importantly, the Issues and Preferred Options document identified that the four boroughs could meet the combined target for household and C&I waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the C&D waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.

1.22 The Issues and Preferred Options document was accompanied by a further SA Report (incorporating SEA, EqIA and Habitats Regulations screening)[7]. Its purpose was to assess the likely effects of the 'preferred option' (consisting of the Vision, eight draft policies and 46 existing waste sites proposed to be safeguarded) and strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework.

1.23 The SA Report concluded that draft Policies WP1-WP8, which were developed by the four partner boroughs as the 'preferred' strategy for the new SLWP (Option 1), would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 were shown to be overwhelmingly negative.

1.24 All representations received on the SA Report on Issues and Preferred Options and how they have been addressed in this SA Report are, again, set out in Appendix 3.

Coverage of SA Report on draft SLWP (Submission Version)

1.25 This document is the SA Report on the draft SLWP 2021-36 (Submission Version). Its purpose is to assess the likely effects of the amended Vision, planning policies and identified sites and the main strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework. As before, the SA Report incorporates the requirements SEA, EqIA and Habitats Regulations screening.

1.26 The following chapters address each of the key stages of appraisal set out in government guidance and best practice within the context of current and future waste arisings, the Vision and

[6] the South London Waste Technical Paper and accompanying Appendices are available at www.sutton.gov.uk/currentconsultations
[7] the SA Report on SLWP Issues and Preferred Options is available at www.sutton.gov.uk/currentconsultations

objectives for the new plan and prevailing social, economic and environmental trends within south London:

- **Section 2** describes the background to the preparation of the new **South London Waste Plan (SLWP)** and the next steps as the plan approaches the EiP stage;
- **Section 3** reviews **Current Waste Arisings and Capacity in South London** drawing upon the Technical Paper (Anthesis, June 2019) and updated evidence on waste management throughputs based on the EA's waste data interrogator as reported in Sutton's Authority Monitoring Report 2018-19 (LB Sutton, March 2020)[8];
- **Section 4** outlines the main stages of **Sustainability Appraisal and Strategic Environmental Assessment** drawing upon government guidance and best practice;
- **Section 5** reviews other **Relevant Plans, Programmes and Sustainability Objectives** at the national, regional and local levels **(Task A1)**[9];
- **Section 6** provides updated **Baseline** information for South London in terms of the key social economic and environmental trends likely to be influenced by the plan **(Task A2)**;
- **Section 7** identifies the key **Sustainability Issues** to be addressed by the SLWP and the sustainability appraisal process, taking account of representations received at each stage **(Task A3)**;
- **Section 8** sets out the finalised **Sustainability Appraisal Framework** consisting of the key sustainability objectives, indicators and targets against which the likely effects of the draft Plan and alternative options have been appraised **(Task A4)**; and
- **Section 9** describes the process by which **Potential Waste Sites** have been identified and assessed as part of the evidence gathering stage. This chapter should be read in conjunction with the more detailed assessment set out in the Technical Paper, the accompanying Appendices and the updated waste throughput data set out in the Sutton AMR 2018-19 **(Task A5)**; and
- **Section 10** describes the development of **Proposed SLWP Policies** and defines the strategic alternatives for the purpose of appraisal **(Task A5)**; and
- **Section 11** analyses the **Compatibility of the Proposed Vision and Objectives against each of the Sustainability Appraisal Framework Objectives (Tasks B1)**
- **Section 12** sets out the **Results of Appraisal** for each of the draft policies (Policies WP1-WP8) and waste management sites set out in the draft Plan **(Tasks B3, B4 and B5)**
- **Section 13** sets out the **Conclusions (Task A5).**

Equalities Impact Assessment (EqIA)

1.27 The purpose of Equalities Impact Assessment (EqIA) is to help public bodies identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 removed the formal requirement for public bodies in

[8] Sutton's AMR 2018-19 is available at https://www.sutton.gov.uk/info/200464/planning_policy/1419/authority_monitoring_report_amr
[9] in line with best practice, a comprehensive scoping table will be provided as part of the next SA/SEA Report on SLWP Issues and Preferred Options which will be published for public consultation from 31 October to 22 December 2019

England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to 'give due regard' to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

1.28 Since many of the issues to be addressed as part of the wider plan appraisal process will inevitably overlap with the consideration of potential impacts upon equalities groups, the requirements of EqIA will be integrated as part of the SA process.

1.29 Accordingly, an updated EqIA Screening report on the draft SLWP (Submission Version) is included in this document as Appendix 1.

Habitats Regulations Assessment (Appropriate Assessment)

1.30 The need for habitats regulations assessment[10] (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive') as set out in the Conservation of Habitats and Species Regulations 2010 (as amended). The Regulations seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

1.31 Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects.

1.32 The following four European sites are located within or in relatively close proximity to the plan area and are therefore potentially affected by the new SLWP 2021-36:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).

1.33 However, only Wimbledon Common SAC lies within the boundaries of the SLWP area.

1.34 Following initial habitats regulations screening undertaken as part of the SA scoping stage, the four partner boroughs concluded that it was very unlikely that a full HRA will need to be prepared for the new waste plan for the reasons detailed in the SA Scoping Report and in Appendix 2 of the SA Report on SLWP Issues and Preferred Options.

1.35 This view is supported by Natural England, the relevant statutory body with responsibility for promoting nature conservation. A letter sent by Natural England on 17 October 2019 in response to public consultation on the SA Scoping Report stated that it had "no comments" on the plan. In a subsequent email dated 31 January 2020 (see Appendix 2), Natural England confirmed that "no comments" should be interpreted by the four partner boroughs to mean that it does not consider that a full HRA is required for the SLWP.

[10] HRA is also referred to as 'Appropriate Assessment'

Sequential test (flood risk)

1.36 The updated national planning policy framework (NPPF) requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Development plan documents should therefore apply a sequential, risk-based approach to designating sites in order to avoid flood risk to people and property and manage any residual risk, taking account of climate change, by applying the 'sequential test' and if necessary, applying the 'exception test' to all potential development sites in line with technical guidelines[11] set out in the NPPG.

1.37 If, following the sequential test, it is not possible, consistent with wider sustainability objectives, for a proposed development to be located in lower flood risk zones, the following two elements of the 'exception test' must be demonstrated where appropriate:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
- a site-specific flood risk assessment (FRA) must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall..

1.38 According to the Government's flood risk vulnerability classifications[12], waste treatment facilities fall within the 'less vulnerable' category, with the exception of landfills and hazardous waste facilities, which are classified as 'more vulnerable'. Therefore, based on the government's flood risk vulnerability and flood zone compatibility table, the vast majority of waste sites (which do not involve hazardous waste or landfilling operations) are compatible with all EA flood zones up to and including Flood Zone 3a (high risk). However, a newly proposed site allocation or planning application for a hazardous waste facility located within Flood Zone 3a (high risk) must pass the exceptions test and should not permitted at all within Flood Zone 3b.

1.39 As can be seen from the response to consultation on the SA Scoping Report, the EA has undertaken a comprehensive review of the proposed waste sites identified in the Issues and Preferred options document against a range of environmental criteria including flood risk, proximity to main rivers, source protection areas and current environmental permit compliance rating.

1.40 Since no new waste sites are being put forward part of the new SLWP and in view of the fact that all of the existing safeguarded sites within the plan area have previously been subject to the sequential and exceptions test as part of the preparation of the current SLWP 2011-21, and/or been subject to a site-specific flood risk assessment where necessary, it is considered that it is unnecessary to include a sequential test report as part of this document.

Consultation arrangements

1.41 This SA report is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from **4 September to 22 October 2020.**

[11] formerly set out in the Government's Planning Policy Statement on Development and Flood Risk (PPS25) (now cancelled)
[12] see Table 3 at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone__compatibility_.pdf

1.42 Copies of the document and evidence are available at the following locations:

- www.croydon.gov.uk/planningandregeneration/framework/localplan/slwaste-plan;
- www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan;
- www.merton.gov.uk/local-plan; and
- www.sutton.gov.uk/currentconsultations.

2. Background to the South London Waste Plan

Current arrangements for waste collection and disposal

2.1 Of the 33 London Boroughs, 21 are arranged into the four statutory joint waste disposal authorities (WDAs) covering East London, North London, West London and West London Riverside (2-tier system). However, each of these Boroughs is responsible for the collection of its own waste.

2.2 The remaining 12 Boroughs, including the South London Boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames, are Combined Waste Collection and Disposal Authorities (i.e. unitary authorities), with separate responsibilities as Waste Collection and Disposal Authorities and as Waste Planning Authorities.

2.3 Each borough's function as a waste planning authority is outlined in National Planning Policy for Waste[13] (NPPW) (DCLG, 2015) which requires that waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. This is the principal purpose of the South London Waste Plan (SLWP).

South London Waste Partnership

2.4 There are many advantages to joint working on a sub-regional level. Waste arisings rarely remain within individual borough boundaries and joint working can also achieve financial savings for individual boroughs. Accordingly, the four South London boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames formed the South London Waste Partnership in order to jointly procure waste treatment and disposal contracts for municipal waste. As the disposal authority for household waste collected by the four South London Boroughs, the South London Waste Partnership adopted a joint Municipal Waste Management Strategy[14] (JMWMS) for South London in 2011 covering the period 2010-20 with the aims of:

- minimising the climate change impact of managing municipal solid waste (MSW) through effective and efficient diversion from landfill;
- working at a sub-regional level to deliver cost effective and environmentally sound waste management services; and
- working towards conformity with the Waste Strategy for England 2007[15] and the London Municipal Waste Management Strategy.

2.5 The most effective way of achieving these aims is to promote more sustainable waste management practices further up the waste management hierarchy (Figure 1.1).

2.6 In 2008, the four partner boroughs decided to prepare a joint waste plan for South London in order to establish a framework of planning policies and site allocations to meet future waste capacity needs in South London for the period 2010-20.

[13] the NPPW is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf
[14] the JMWMS 2010-20 is available at http://www.slwp.org.uk/wp-content/uploads/2011/03/Waste-Strategy-FINAL.pdf
[15] the Waste Strategy for England 2007 is available at https://www.gov.uk/government/publications/waste-strategy-for-england-2007

The current South London Waste Plan 2012

2.7 The current South London Waste Plan (SLWP), adopted in March 2012, sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within South London over the 10-year period from 2011-21. The SLWP, which forms part of the local development plan for each of the partner boroughs, safeguards 27 existing permitted waste facilities and identifies 11 broad locations (industrial areas) suitable for new waste facilities in order to meet the then London Plan apportionment for 2011 (Table 2.1) and sets out a number of criteria-based policies for determining planning applications for waste management facilities.

Table 2.1: London Plan 2011 Combined Apportionments for the South London Waste Plan area

Year	Combined municipal (MSW) and Commercial & Industrial (C&I) waste apportionment
2010	854,000 tonnes
2015	1,130,000 tonnes
2020	1,332,000 tonnes
2021[16]	1,326,000 tonnes

2.8 In seeking to meet and exceed the combined apportionment targets for municipal solid waste (MSW) and commercial and industrial waste (C&I), Policy WP1 of the SLWP aims to provide sufficient capacity within the four boroughs to manage:

- a minimum of 834,011 tonnes of waste by 2016 to meet the 2011 London Plan apportionment and strive to achieve self-sufficiency by providing 1,004,350 tonnes of capacity in total to meet South London's waste management needs; and
- a minimum of 941,024 tonnes of waste by 2021 to meet the 2011 London Plan apportionment and strive to achieve self-sufficiency by providing 1,017,427 tonnes of capacity.

2.9 The above targets are to be achieved by safeguarding existing waste management capacity and encouraging intensification of existing waste sites identified in Policy WP3 and by developing additional capacity within the industrial areas identified in Policy WP4 where this complies with all other waste plan policy requirements and the waste hierarchy.

2.10 Under Policy WP2, planning permission for additional facilities for other waste streams, including construction, demolition and excavation waste (CD&E), hazardous waste, agricultural waste, clinical waste, radioactive waste and waste water will be permitted where there is an identified need for such a facility within the South London Waste Plan area, which cannot be met through existing waste facilities or the adaptation of existing waste facilities.

2.11 Since the adoption of the SLWP in 2012, the four partner boroughs have monitored performance against the above targets through the publication of an Annual Monitoring Report (AMR). Section 3 of this document provides a detailed review of current and future waste arisings within the plan area, and existing and potential waste management sites across the four boroughs drawing upon updated evidence set out in the Technical Paper.

2.12 The SLWP plan period is now coming to an end and a new waste plan is required in order to meet the Mayor's updated apportionment targets from 2021 to 2041 in the 'Intend to Publish London Plan (GLA, December 2019) and a range of other sustainable waste management targets set out in the Mayor's Environment Strategy (GLA, 2018).

[16] the London Plan 2011 provided an apportionment to 2020. The 2021 apportionment was based on London's continuing 85% self-sufficiency and maintaining the Plan area's contribution to this

Preparing the new South London Waste Plan 2021-36

Consultation on SLWP Issues and Preferred Options document (Regulation 18 Consultation)

2.13 Following extensive evidence gathering work, culminating in the production of the Technical Paper by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report, an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019.

2.14 The following key waste planning issues were identified:

- Key Issue 1 Cross Boundary Issues;
- Key Issue 2 How much waste must the South London Waste Plan plan for?
- Key Issue 3: Scarcity of Land;
- Key Issue 4: Waste Transfer Facilities; and
- Key Issue 5: Climate Change, the End of Landfill, and the The Circular Economy.

2.15 The document put forward eight draft waste policies and identified 46 existing sites across the four boroughs to be safeguarded for waste treatment uses over the plan period to 2036. Importantly, the document identified that the four boroughs could meet their target for household and commercial and industrial waste (C&I) by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall against the C&I target by allowing the intensification of treatment on existing sites. The document proposed no new waste sites, although a replacement site for an existing site would be considered.

2.16 Consultation methods were developed in accordance with the statutory regulations and respective Statements of Community Involvement (SCIs) and included contacting all individuals and organisations on the respective planning policy consultation databases; dedicated consultation webpages; making the documents available at Council offices and libraries; notices in the local press; council tweets and Facebook posts; presentations to local neighbourhood committees; and letters delivered to residential properties in the vicinity of proposed waste sites.

2.17 At the close of the consultation period, a total of 1,155 representations[17] had been received from 78 individual consultees. The key waste planning and sustainability issues arising from public consultation and how they have been addressed in the draft Plan are discussed further in Section 7.

Publication Draft SLWP (Submission Version) (Regulation 19 Consultation)

2.18 A draft version of the SLWP 2021-36 (the draft Plan) has now been published for public consultation between 4 September and 22 October prior to submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) for Examination-in-Public (EiP).

2.19 The major changes made to the draft waste policies and sites proposed to be safeguarded in the Issues and Preferred Options document are as follows:

- **Key Issue 3 - Scarcity of Land** has been updated to reflect the fact that the London Planhousing targets have been reduced and to provide more statistics on the demand for industrial land from non-waste industrial uses;
- **The Vision and Objectives** have been amended because they did not quite reflect the policies;
- **Policy WP2 (Strategic Approach to Other Forms of Waste)** has been amended to reflect themove from a shortfall in C&D waste to a small surplus against the target. Also, the position regarding Excavation Waste has been clarified to reflect the concerns of South East councils;

[17] a complete list of representations to the SLWP Issues and Preferred document and to accompanying SA Report together with officer comments are available in the South London Waste Plan Examination Library

- **Policy WP6 (Sustainable Construction of Waste Facilities)** has been amended so that the sustainability credentials can been measured against one and/or two sustainability metrics;
- **Policy WP8 (New Development Affecting Existing Sites)** is a new policy to reflect the requests from SUEZ and Veolia. It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy;
- **Policy WP10 (Monitoring and Contingencies)** is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies;
- **Site C2 (Croydon Car Spares, Croydon)** has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- **Site C3 (Curley Skip Hire, Croydon)** has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- **Site C5 (Factory Lane Waste Transfer Station, Croydon)** has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners;
- **Site K1 (Chessington Equestrian Centre, Kingston)** has been deleted because it is a temporary site which is closing soon;
- other changes to safeguarded sites comprise boundary changes, references to overhead power lines and references to the need of a transport assessment including cumulative impacts;
- a table of indicators has been introduced as part of the draft Plan (as Appendix 1) for the purpose of monitoring the effectiveness of SLWP policies over the plan period; and
- new waste throughput figures have been included in Appendix 2 of the draft Plan in order to reflect the latest information from site owners and amendments as to which sites have potential for intensification.

2.20 Any objections to the draft plan must be made with reference to the 'Tests of Soundness' in Paragraph 35 of the National Planning Policy Framework: **positively prepared; justified; effective; and consistent with national policy.**

Next Steps

2.21 Following the publication of the draft Plan, there are a number of procedural steps that need to be followed before the SLWP 2021-36 can be adopted and these are set out in Table 2.1 below.

Table 2.1: Timetable for adopting the new SLWP 2021-36

Steps	Timescale
Draft SLWP Published and Representations Sought	October 2019
End of Representations Period	December 2019
Consideration of Representations	Jan-Sept 2020
Submission to the Secretary of State	November 2020
Appointment of Planning Inspector	TBC
Start of Hearings for the Examination-in-Public (EiP)	TBC
End of Hearings for the EiP	TBC
Main Modifications (arising from the EiP) *NB:* This *stage may not be required*	TBC
Issuing of the Inspector's Report	TBC
Recommendation for Adoption by the committees	TBC
Adoption at Full Council	TBC

3. Current Waste Arisings and Capacity in South London

Evidence gathering

3.1 Any new waste plan must be underpinned by a robust and proportionate evidence base document which includes an assessment of existing capacity, waste management need and suitable sites and areas to meet this need. Accordingly, the four partner boroughs commissioned Anthesis Consultants to prepare a comprehensive evidence base upon which the new South London Waste Plan 2021-36 can be prepared. The outcome of this comprehensive study is set out in the 'South London Waste Technical Paper (Anthesis, June 2019).

3.2 The Technical Paper includes the following outputs:

Policy context

- a review of all legislation and policy relevant to waste planning in England and to the preparation of a waste development plan document (DPD) and its evidence base.

Waste arisings and forecasts for apportioned waste

- waste arisings and forecasts to 2036 for each waste type covered by the draft London Plan apportionment i.e. household and commercial & industrial (C&I) wastes.

Arisings and forecasts for other waste types

- waste arisings and forecasts for other waste streams that do not count towards the draft London Plan apportionment e.g. construction, demolition and excavation waste (CD&E), low level radioactive waste, agricultural waste, hazardous waste and wastewater.

Waste capacity assessment for apportioned waste

- an assessment of current and future waste management capacity of waste sites/facilities in each of the partner boroughs as well as in the SLWP area as a whole, including apportionment criteria[18]; existing capacity for permitted and exempt waste sites; the 'capacity gap' between apportionment targets and arisings of other waste types compared to the management capacity; and the likely land requirement to meet any shortfall (for each borough and collectively).

Sites and areas

- potential sites and areas which could help meet the capacity gap, either through the intensification of existing operations, or through delivery of new sites.

Imports and exports

- an assessment of waste imports and exports to and from the SLWP area.

Conclusions and recommendations

- key conclusions and recommendations arising from the study.

[18] apportionment criteria are needed to determine what types of waste facility/operations should be counted as 'waste management' and therefore what waste streams should count towards the apportionment

Waste arisings and forecasts for apportioned waste

3.3 Table 3.1 shows forecast household and C&I waste arisings in the four boroughs over the plan period and the combined apportionment targets for managing this waste set out under Policy SI8 of the 'Intend to Publish' London Plan (GLA, December 2019)[19]. Unlike the existing London Plan, the new apportionment targets are not broken down into separate household and C&I waste streams.

Table 3.1: Forecast household and C&I waste arisings and draft London Plan apportionments for 2021 to 2036 (tonnes per annum)[20]

	2021		2026		2031		2036	
	Arisings	Apportionment	Arisings	Apportionment	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	309,000	256,000	312,000	260,000	320,000	264,000
Kingston	152,000	187,000	153,000	190,000	155,000	193,000	157,000	196,000
Merton	174,000	238,000	175,000	241,750	175,000	245,500	180,000	249,250
Sutton	161,000	211,000	161,000	213,500	161,000	217,000	168,000	220,550
SLWP	**792,000**	**887,000**	**800,000**	**901,250**	**808,000**	**915,500**	**825,000**	**929,750**

3.4 The Mayor calculates future household waste arisings for each Borough on the basis of the average tonnage of waste generated per person multiplied by the forecast number of residents identified in the GLA's latest population projections. A 5% reduction is then factored in to account for the anticipated increase in waste management efficiency and the growth in the circular economy by the end of the London Plan period (2041).

3.5 However, forecast household and C&I waste arisings are then redistributed amongst Boroughs for the purpose of setting revised London Plan apportionment targets. Boroughs considered to have more scope to manage higher levels of waste have been given a higher apportionment target and those considered to have less scope have a lower target. The Mayor used the following criteria for redistributing apportionment waste between boroughs:

- existing waste facilities and industrial land,
- arisings in a borough,
- presence of railheads and wharves,
- proximity to major routes,
- restrictive land designations (such as heritage or biodiversity),
- flood risk and
- socio-economic factors.

3.6 It can be seen from the above table that three out of the four boroughs have been set apportionment targets which are higher than their anticipated waste arisings from 2021 to 2036, with the exception of Croydon, which has been set a lower target. Overall, the combined apportionment for the four boroughs is higher than the anticipated arisings over the plan period.

3.7 In order to assess whether there is sufficient waste management infrastructure within the SLWP area, the new combined apportionment targets have been used, rather than forecast arisings.

[19] see Policy SI8 'Waste capacity and net waste self-sufficiency' at https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf
[20] the new London Plan apportionment targets for each borough in 2021 and 2041 have been used to calculate targets for the intervening years up to the end of the SLWP period in 2036

Arisings and forecasts of other waste types

Construction and Demolition Waste Arisings

3.8 Table 3.2 shows both the current and forecasted construction and demolition (C&D) waste arisings within the plan area. Figures for 2017 are taken from the Environment Agency's (EA) Waste Data Interrogator, and future arisings have been forecast using the GLA's employment forecasts for the construction sector until 2036. These figures show an increase in forecast C&D waste arisings from 382kt in 2017 to 414kt by 2036.

Table 3.2: Forecast C&D waste arisings for the SLWP area (tonnes per annum)

Area	Waste Source	Waste Type	2017	2021	2026	2031	2036
Croydon	C&D	Inert/C+D	282,613	292,593	294,629	300,542	304,303
		Hazardous	364	377	380	388	392
		Total	**282,977**	**292,970**	**295,009**	**300,930**	**304,695**
Kingston	C&D	Inert/C+D	37,530	37,850	38,242	39,002	39,002
		Hazardous	36	37	37	38	38
		Total	**37,566**	**37,887**	**38,279**	**39,040**	**39,040**
Merton	C&D	Inert/C+D	46,243	47,956	50,051	52,081	54,016
		Hazardous	19	19	20	21	22
		Total	**46,262**	**47,975**	**50,071**	**52,102**	**54,038**
Sutton	C&D	Inert/C+D	15,478	15,638	15,834	16,214	16,576
		Hazardous	29	29	30	30	31
		Total	**15,507**	**15,667**	**15,864**	**16,244**	**16,607**
SLWP	C&	Inert/C+D	381,865	394,036	398,756	407,838	413,897
		Hazardous	448	463	467	477	483
		Total	**382,313**	**394,499**	**399,223**	**408,315**	**414,380**

Low Level Radioactive Waste

3.9 According to the EA's public register, there are ten organisations holding 13 permits to keep and use radioactive materials within the four SLWP boroughs. These are mainly hospitals, universities and private companies. Any discharges from these permitted facilities to air, water (including discharges to sewer) and land are regulated and monitored under the Pollution Prevention and Control (PPC) regime. The latest EA dataset (2017) identifies small permitted discharges to sewer within the plan area but no solid waste transfer, and therefore this waste places no requirement on the SLWP to deliver additional solid waste management infrastructure.

Agricultural Waste

3.10 Data from the WDI shows that only 383 tonnes of waste from agricultural sources were generated within the SLWP area in 2017. Given the relatively small tonnage of this waste and the predominantly urban character of the four boroughs, this waste stream is not considered to require further consideration.

Hazardous Waste

3.11 Table 3.3 shows that hazardous waste arisings within the plan area are predicted to increase from 20.2 ktpa in 2017 to around 21.6 ktpa by 2036 based on the EA's Hazardous Waste Data Interrogator (WD).

3.12 Future hazardous waste arisings have been forecast using anticipated growth rates in the GLA's draft London Plan and forecast C&I waste arisings. However, these tonnages are already included in the household and C&I waste apportionment and in forecasted CD&E waste arisings.

Table 3.3: Hazardous waste arisings in the SLWP area (tonnes per annum)

	2017 (baseline)	2021	2026	2031	2036
Croydon	8,514	9,008	9,008	9,008	9,193
Kingston	2,404	2,404	2,404	2,404	2,432
Merton	4,325	4,591	4,591	4,591	4,685
Sutton	4,936	5,239	5,239	5,239	5,303
SLWP	**20,180**	**21,242**	**21,242**	**21,242**	**21,612**

Wastewater

3.13 Thames Water is responsible for wastewater and sewage sludge treatment in London and for the management of sewage treatment works (STWs) and associated sewerage infrastructure. Wastewater quantities are expected to increase from 52.9 million m^3/yr to 55.7 million m^3/yr over the plan period. The four boroughs are served by STWs at Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC). Thames Water has confirmed that these facilities have adequate capacity to manage the incoming sewage and have all had major capacity increases since 2010[21].

Waste exports and imports

3.14 In total for the combined household and C&I (apportioned) waste streams, in the baseline year of 2017, the SLWP area exported 309,700 tonnes but 'received' around 620,000 tonnes of apportioned waste which was not identified as being generated within the four boroughs. This would suggest that the SLWP area is a net importer of waste. However, a very large proportion of the imports were non-codeable (ie. origin data not provided), and therefore some of this waste is likely to have been generated within the four boroughs themselves. There is no way of attributing this tonnage to specific WPAs. In addition, 235,000 tonnes of waste received (38% of the total) was received by transfer stations, rather than final destination waste treatment facilities.

3.15 Similarly, 238,000 tonnes of CD&E waste was exported from the SLWP area to other WPAs. However, again although the figure for imports is higher at 393,000 tonnes, only 91,000 tonnes were attributable to specific WPAs, and the remaining origins are unknown. And 71% of the waste imported (278,300 tonnes) was received by transfer stations, rather than final destination waste treatment facilities.

3.16 For hazardous waste, as the data source is different, there is less uncertainty with regard to origins. In this case, the SLWP area exported 20,200 tonnes in 2017, with 20% of this going to Kent. South London received 800 tonnes in 2017, and so is a net exporter of hazardous waste.

[21] details of STW capacity increases in recent years are set out in the Thames Water Asset Management Plans for 2010-15 (AMP5) and for 2015-20 (AMP6)

Existing waste management sites and capacity

3.17 As part of the evidence base for the new plan, a comprehensive analysis has been undertaken for all operational waste management sites in South London in order to establish current and future waste management capacity within the plan area. A number of data sources were used, including discussions with site owners and EA 'active sites', Waste Data Interrogator (WDI) and environmental permitting data (using 2017 as the baseline year).

3.18 In line with the Intend to Publish London Plan 2019, waste is deemed to be 'managed' where:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra definition as a minimum[22].

3.19 Where material is bulked at transfer stations for transportation to other waste management facilities, this capacity is not included as a contribution towards the apportionment targets. However, where a proportion of the incoming waste is recycled, this recycling capacity has been included.

3.20 Table 3.4 below provides a breakdown of existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment for household and C&I waste. Where relevant, opportunities to increase capacity are identified, such as intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses.

3.21 Waste facilities in the planning pipeline were identified which, if given permission, would also contribute towards meeting any shortfall in waste management capacity. Exempt sites, which do not require an environmental permit, have also been included where capacity meets the requirements of the London Plan.

3.22 The waste capacity information in Table 3.4 has been revised following consultation on the SLWP Issues and Preferred Options document in order to accommodate new waste throughput figures and to reflect the latest information from site owners as to which sites have potential for intensification. In addition, a number of sites have been amended or deleted as follows:

- Site C2 (Croydon Car Spares, Croydon) has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- Site C3 (Curley Skip Hire, Croydon) has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- Site C4 (Days Aggregates): The estimated throughput of C&D waste at this site has been increased from 0 to 178,593 tonnes per annum following consultation with the site owner;
- Site C5 (Factory Lane Waste Transfer Station) has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners; and
- Site K1 (Chessington Equestrian Centre) has been deleted because it is a temporary site which is closing soon.

[22] refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns

3.23 The most significant outcome of the above changes (arising from the increased throughput figures for the Days Aggregates site C4) is that the overall current throughput of C&D waste across the four boroughs has increased from 241,682 to 420,275 tonnes per year.

3.24 Table 3.4 shows that the current capacity for the management of household and C&I waste in South London is 946,345 tonnes per annum. This represents a capacity surplus of 16,595 tonnes per annum compared to the combined apportionment of 929,750 tonnes per annum for 2036.

3.25 The overall current throughput of C&D waste across the four boroughs, at 420,275 tonnes per year, now exceeds forecast C&D arisings at the end of the plan period in 2036 (414,380 tonnes per annum) by +5,895, where there was previously an estimated shortfall of 172,698 tonnes per annum.

Table 3.4 Sites Counting Towards the Apportionment and C&D Targets (updated)

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
Croydon				
C1	Able Waste Services	0	43,268	
C4	Days Aggregates Purley Depot	0	178,593	
C5A	Factory Lane Waste Transfer Station	0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre site	9,623	5,206	
C6	Fishers Farm Reuse & Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Materials	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Civic Amenity Site	6,684	0	
C11	Safety Kleen	0	0	
C12	Stubbs Mead Depot	0	0	
C13	Solo Wood Recycling	5,000	0	Yes
CEX	Exempt Sites	2,580	0	
	Croydon Total	**32,883**	**227,067**	
Kingston				
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Civic Amenity Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
	Kingston Total	**35,642**	**0**	
Merton Capacity				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M3	Deadman Confidential	9,866	0	
M4	Garth Road Re-use and Recycling Centre	15,704	0	
M5	Garth Road Transfer Station	0	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management Wandle Way	0	33,845	
M9	Maguire Skips (Wandle Way)	0	0	
M10	Powerday (Weir Court)	0	42,856	

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
M11	Morden Transfer Station	0	0	
M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites	1,000	0	
	Merton Total	**213,179**	**150,183**	
Sutton Capacity				
S1	777 Recycling Centre	20,625	32,972	
S2	Beddington Farmlands ERF	275,000	0	
S3	Cannon Hygiene	0	0	
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Civic Amenity Site	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Country Waste Skip Hire	305,000	0	
SEX	Exempt Sites	500	0	
	Sutton Total	**664,641**	**43,025**	
South London Capacity				
	Croydon	32,883	227,067	
	Kingston	35,642	0	
	Merton	213,179	150,183	
	Sutton	664,641	43,025	
	South London Total	**946,345**	**420,275**	
South London Capacity Gap				
	South London Capacity (2017 baseline year)	946,345	420,275	
	South London Apportionment/Forecast for 2036	929,750	414,380	
	Capacity Gap/ Surplus	**+16,595**	**+5,895**	

Source: Anthesis Consultants 2019 (incorporating subsequent amendments 2020)

3.26 More detailed site profiles are set out in Appendix 4 of the Technical Paper, including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility and planning constraints. Further information on exempt sites and assumed capacities are provided in Section 5.2.3 of the Technical Paper.

4. Sustainability Appraisal and Strategic Environmental Assessment

Government Guidance and best practice

4.1. The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new South London Waste Plan (SLWP) is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended.

Main Stages of Appraisal

4.2. Government guidance identifies five main stages of appraisal (A to E) that should be carried out as part of the preparation of all development plan documents (DPDs), including jointly prepared plans such as the SLWP. Each stage consists of a number of 'key tasks' as outlined below.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

4.3. Stage A, to be undertaken as part of the evidence-gathering process, consist of the following tasks:

- **Task A1:** Identifying other relevant policies, plans and programmes, and sustainability objectives which are likely to influence the options to be considered (Section 5);
- **Task A2:** Collecting 'baseline' information to enable the impacts of policy options on sustainability objectives to be predicted and monitored (Section 6);
- **Task A3:** Identifying sustainability issues and environmental problems as the basis for defining key issues for the plan to address (Section 7);
- **Task A4:** Developing the SA Framework, consisting of sustainability objectives, indicators and targets, in order to test the environmental, social and economic effects of the plan (Section 8); and
- **Task A5:** Consulting on the scope of the SA on the basis of a scoping report presenting the outcome of Stage A.

4.4. The SA Scoping Report, published for public consultation between 16 September and 21 October 2019, presents the outcome of Stage A in relation to the appraisal of the emerging SLWP.

Stage B: Developing and Refining Options and Assessing Effects

4.5. Stage B, which has been carried out as part of the process of identifying SLWP issues and preferred options, involves:

- **Task B1:** Testing plan objectives against the SA Framework to ensure compatibility;
- **Task B2:** Developing plan options, working with the community and stakeholders, in order to achieve the objectives and contribute to sustainable development;
- **Task B3:** Predicting the social, economic and environmental effects of the plan options against the SA Framework and comparing with the 'no plan' and 'business as usual' scenarios;
- **Task B4:** Evaluating the effects of the plan in terms of their significance and the overall sustainability of each option, including the 'preferred option';
- **Task B5:** Considering ways of mitigating adverse effects and maximising beneficial effects; and
- **Task B6:** Proposing measures to monitor the significant effects of plan implementation.

Stage C: Preparing the Sustainability Appraisal Report

4.6. The SA Report, which must be prepared prior to publication, is the key output of the appraisal process:

- **Task C1:** Preparing the SA Report.

4.7. The SA Report should present the outcome of Stages A and B and clearly show that the SEA Directive's requirements have been met in terms of providing information on the likely significant effects on the environment, the reasons for selecting the alternatives dealt with and measures to prevent, reduce or offset any potentially adverse effects.

4.8. In the context of the emerging SLWP, Task C1 has been undertaken in two stages (i) the preparation of the SA Report on SLWP 'Issues and Preferred Options' which was published for public consultation as part of the Regulation 18 process between 31 October and 22 December 2020; and (ii) the SA Report on the SLWP Submission Version (this document) which has been published for public consultation between xxx MONTH and yyy MONTH as part of the Regulation 19 process.

Stage : Consulting on Preferred Options

4.9. Stage D involves the following Tasks:

- **Task D1:** Public participation on Preferred Options and the SA Report to give the public and statutory bodies an opportunity to comment;
- **Task D2(i):** Appraising significant changes which may have been incorporated within the plan prior to submission;
- **Task D2(ii):** Appraising significant changes resulting from representations; and
- **Task D3:** Making decisions and providing information through the production of an Adoption Statement to accompany the adopted plan. The Adoption Statement will outline how the findings of SA have been taken into account and how sustainability considerations have been integrated into the plan.

Stage E: Monitoring the significant effects of implementing the plan

4.10. Stage E requires the significant effects of the plan to be monitored in order to measure its performance against sustainability objectives and inform future policy revisions:

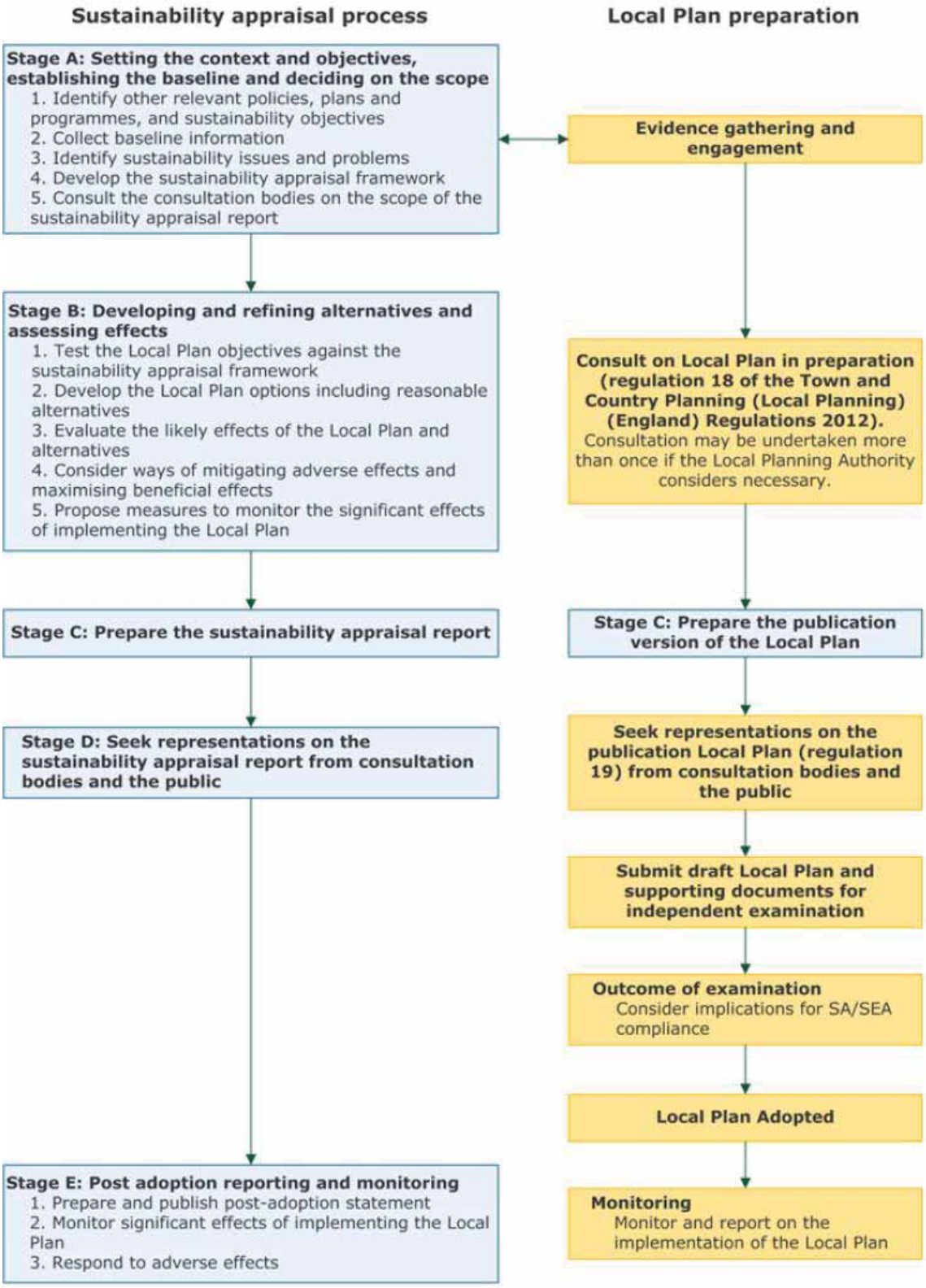
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

4.11. In line with Government guidance, Authority Monitoring Reports (AMRs) should include the findings of plan and SA monitoring. In the case of the SLWP, it is intended that the Sutton AMR will provide the means for reporting on the significant effects of the plan in order to measure its performance against the sustainability objectives, indicators and targets making up the SA Framework (see Section 9).

Key Outputs of Appraisal

4.12. Figure 4.1 shows main stages of SA in relation to the plan-making process.

Figure 4.1: Main Stages of SA in relation to the DPD Process



4.13. Table 4.1 sets out the key outputs of the SA process in relation to the new SLWP in terms of the expected timescale for the preparation of SA Reports for public consultation.

Table 4.1: Key Outputs of the SA process

Stage of Plan Preparation	Key Appraisal Outputs (publication of SA Reports)	Timescale
Evidence Gathering	• **SA Scoping Report** *SA Tasks A1-A5*	Consultation with relevant bodies 16 September – 22 Octobert 2019
Consultation on Issues and Options	• **SA Report on Issues & Options** • Equalities Impact Assessment (EqIA) report • Habitats Regulations Assessment (HRA) screening *SA Tasks B1-B6*	31 October - 22 December 2019
Consultation on draft SLWP Proposed Submission	• **SA Report on Proposed Submission** • EqIA • HRA (if required) *SA Tasks C1 and D1-D2*	4 September - 22 October 2020
Submission of draft SLWP incorporating minor changes to the Secretary of State	• **SA Report on Submission Draft incorporating minor changes** • EqIA • HRA (if required) *SA Tasks C1 and D1-D2*	TBC
Examination-in-Public	*SA Tasks C1 and D1-D2*	TBC
Inspector's Report	*SA Tasks C1 and D1-D2*	TBC
Adoption of SLWP incorporating modifications	• **SA Report on modifications** arising from Inspector's Report *SA Task D3*	TBC
Post-adoption	• **ongoing monitoring of SLWP** (via AMRs) *SA Tasks E1 and E2*	TBC

Equalities Impact Assessment

4.14. An Equalities Impact Assessment (EqIA) is defined by the Equality and Human Rights Commission[23] as *"a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody"*. EqIAs help local planning authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should therefore inform policy preparation from the earliest stages of plan making.

4.15. EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to "give due regard" to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying with this duty.

[23] further details are available on at http://www.equalityhumanrights.com

4.16. When applied to policy documents such as the SLWP, the first stage of EqIA involves screening to identify the potentially beneficial and adverse impacts of emerging policies and proposals on each of the specific equality target groups and to identify any gaps in knowledge. Then - where any potentially significant adverse effects are identified and/or if the potential impact is not intended and/or illegal - a full stage 2 assessment should be carried out. This should focus on the significant negative impacts and identify possible mitigation measures. Consultation with stakeholders and members of equality target groups should be undertaken during this phase.

4.17. A full EqIA report has therefore been prepared and included in this document as Appendix 1.

Habitats Regulations Assessment (HRA)

4.18. The purpose of the Habitats Regulation Assessment (HRA) of land use plans (often referred to as 'Appropriate Assessment') is to ensure that the protection and integrity of European nature conservation sites (also known as the Natura 2000 network) is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that a HRA must be carried out on all land use planning documents. This requirement has subsequently been implemented in the UK through an amendment to the 1994 Conservation (Natural Habitats) Regulations (August 2007). The regulations are responsible for safeguarding conservation sites of EU importance such as Special Protection Areas (SPAs), Special Areas for Conservation (SACs) and international RAMSAR sites.

4.19. Government guidance identifies three steps to the HRA process (1) likely significant effects (2) appropriate assessment and ascertaining the effect on site integrity, and (3) mitigation and alternative solutions. Task 1 of the HDA process, which identifies whether a plan is 'likely to have a significant effect' on a European site, is referred to as 'screening' under the Regulations.

4.20. An HRA screening report has therefore been prepared and included in this document as Appendix 2.

5. Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

Policy review

5.1 A comprehensive review of all international, national, regional and local policies, plans and programmes relevant to the South London Waste Plan (SLWP) has been carried in order to identify key sustainability objectives for the purpose of appraisal and waste management issues to be addressed in the Plan.

5.2 This chapter outlines the policy context within which the plan is being prepared at the European, national, subregional and local level. Details of the review findings are set out in Chapter 2 of the South London Waste Technical Paper (Anthesis, June 2019) and Section 5 of the SA Scoping Report (September 2019).

International context

European Union (Withdrawal Agreement) Act 2020 ('Brexit')

5.3 The EU (Withdrawal Agreement) Act 2020, which was given Royal Assent on 23 January 2020, transposed the current framework of environmental regulation set out in EU Directives into UK law and therefore provides some degree of certainty in terms of policy direction for the immediate future.

EU[24] Waste Framework Directive 2008

5.4 The EU Landfill Directive 1999/31/EC aims to minimise the negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements and setting the following targets for the reduction of biodegradable municipal waste going to landfill:

- by 2010 to reduce the biodegradable municipal waste disposed to landfill to 75% of that produced in 1995;
- by 2013 to reduce the biodegradable municipal waste disposed to landfill to 50% of that produced in 1995; and
- by 2020 to reduce the biodegradable municipal waste disposed to landfill to 35% of that produced in 1995.

EU Waste Framework Directive 2008

5.5 Article 28 of the EU Waste Framework Directive 2008 requires all Member States to produce a Waste Management Plan. This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery installations. In the UK, these locational criteria are deferred to the Local Plans or waste plans prepared by local planning authorities. The new SLWP will therefore form part of the UK's Waste Management Plan. The Government's Resources and Waste Strategy (see below) commits to reviewing the Waste Management Plan for England in 2019.

Waste Electrical and Electronic Equipment Directive

5.6 The Waste Electrical and Electronic Equipment Directive 2002/96/EC (or 'WEEE' Directive) seeks to address the increasingly rapid growth of waste electrical and electronic equipment and sets out measures to promote the re-use, recycling and recovery of such wastes in order to reduce the need for disposal.

[24] while the UK left the EU on 31 January 2020, all relevant EU Directives have been transposed into UK law through the EU (Withdrawal Agreement) Act 2020

EU Review of Waste Policy and Legislation

5.7 The 'Review of Waste Policy and Legislation' published by the EU in December 2015, introduces higher targets for recycling and for the phasing out the landfilling of organic and recyclable materials. This means that any additional waste management facilities required to meet these new targets must be planned for in waste plans. The London Environment Strategy (GLA, 2017) includes similar targets, such as recycling 65% of municipal waste by 2030, and these have been incorporated into the draft new London Plan (GLA, 2017).

UNESCO World Heritage Convention

5.8 The 'Convention Concerning the Protection of the World Cultural and Natural Heritage' was adopted by UNESCO in 1972 and has been signed by 193 countries.

European Convention on the Protection of Archaeological Heritage

5.9 The Convention for the protection of the architectural heritage of Europe is a legally binding instrument setting a framework for an accurate conservation approach in Europe.

National context

Localism Act 2011 and the Duty to Co-operate

5.10 Section 110 of the Localism Act 2011 prescribes the 'Duty to Co-operate' between local authorities in order to ensure that they work together on strategic cross-boundary issues such as waste planning.

HM Government 25 Year Environment Plan

5.11 A Green Future: Our 25 Year Plan to Improve the Environment', sets out the following strategic goals for 'Maximising resource efficiency and minimising environmental impacts at end of life':

(i) Achieving zero avoidable plastic waste by the end of 2042;
(ii) Reducing food supply chain emissions and waste;
(iii) Reducing litter and littering;
(iv) Improving management of residual waste;
(v) Cracking down on fly-tippers and waste criminals; and
(vi) Reducing the impact of wastewater.

UK Resources and Waste Strategy (December 2018)

5.12 The Government's 'Resources and Waste Strategy for England'[25] was introduced in December 2018, building on the earlier publication of 'A Green Future: Our 25 Year Plan to Improve the Environment'[26] in January 2018. In seeking to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy, the strategy:

- commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in order to align national policies with the Resources and Waste Strategy;
- introduces proposals to ensure that producers will pay for the disposal of their own packaging; set a tax on plastic packaging which does not include 30% recycled content; establish deposit return schemes; deliver streamlined recycling and food waste collection services for households and businesses; and improve the efficiency of energy recovery facilities;
- commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets; and
- seeks to tackle the problem of waste crime, which cost the English economy around £600 million in 2016, harms local communities and which pays no heed to the value of scarce resources.

[25] available at https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england
[26] available at https://www.gov.uk/government/publications/25-year-environment-plan

Waste Management Plan for England

5.13 The Waste Management Plan for England (Defra, 2013) identifies how much waste is generated in England, how that waste is managed and future waste infrastructure needs in order to meet the obligations of the revised EU Waste Framework Directive. It confirms that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England.

National Planning Policy Framework

5.14 The revised National Planning Policy Framework (NPPF) (MHCLG, February 2019) states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence which should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. Local Plans should be:

(a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

(b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

5.15 The South London Waste Technical Paper (Anthesis, June 2019) focuses on meeting the above requirements, including identifying South London's objectively assessed waste management needs (positively prepared); enabling an appropriate strategy to be identified for managing South London's waste (justified); identifying strategic waste exports from South London (effective); and ensuring conformity with waste policies (consistent with national policy).

5.16 The revised NPPF sets out the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate (DtC). When assessing if the SLWP is sound, the Inspector will look to statements of common ground between the four boroughs and neighbouring authorities in London and the South East for evidence that cross-boundary strategic matters have been addressed and that they have complied with the DtC.

National Planning Policy for Waste (NPPW)

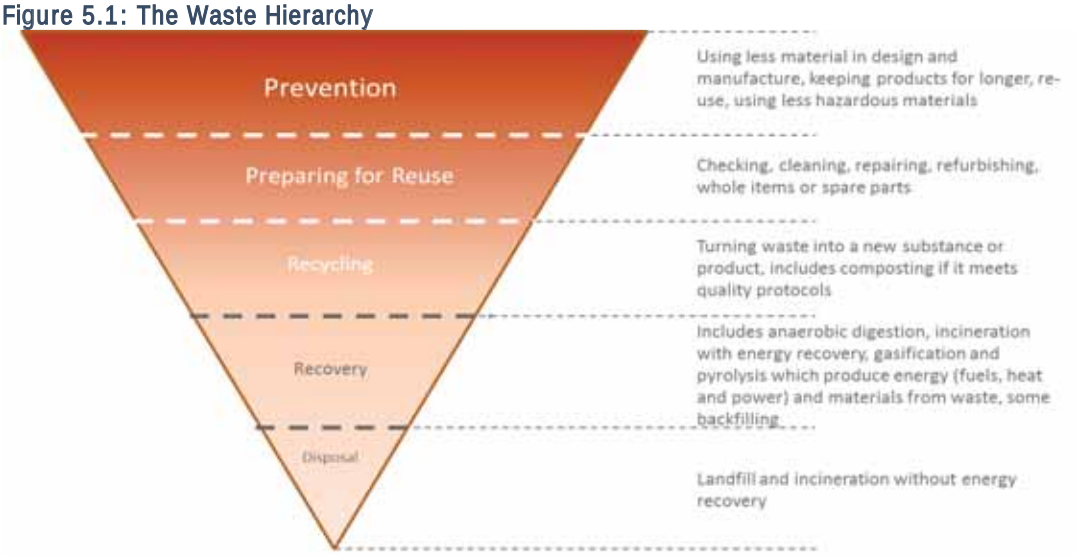
5.17 The National Planning Policy for Waste[27] (DCLG, 2015) sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW requires waste planning authorities to:

- prepare Local Plans or local waste plans which drive waste management up the waste hierarchy (see Figure 5.1);
- have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management;
- allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan (suitable areas can be identified as well as sites

[27] the National Planning Policy for Waste is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

for new or enhanced waste management facilities);
- provide additional capacity through facilitating the maximum use of existing facilities;
- direct new waste facilities towards industrial locations;
- identify broad types of waste management facility that would be appropriately located on allocated sites or in suitable areas in line with the waste hierarchy; and
- seek opportunities to co-locate waste management facilities together with complementary activities.

Figure 5.1: The Waste Hierarchy



5.18 Local waste plans must be underpinned by a proportionate evidence base which establishes the need for waste management facilities and identifies suitable sites and areas to meet this need. The evidence base should include details of:
- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings.

5.19 Information on existing waste management facilities should include:
- site location details – site name, operator, address, postcode, borough, grid reference etc;
- type of facility - what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details - reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;
- capacity information - licensed and permitted throughput by waste type;
- site lifetime or maximum capacity - it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources - origin of wastes managed, broken down by type and location;
- outputs from facility - recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information - potential of site for increasing throughput, adding further capacity, other waste management uses etc.

5.20 The Technical Paper provides up-to-date information relating to each of the above points and therefore provides a sound evidence base for preparing the new SLWP.

National Planning Practice Guidance (PPG)

5.21 National Planning Practice Guidance[28] (DCLG, 2015) states that a Local Plan relating to waste should identify sufficient opportunities to meet the identified needs of an area for the management of waste in order to drive waste management up the waste hierarchy. Suitable sites and areas for waste management should be identified in appropriate locations to deal with the following streams:

- municipal/household;
- commercial/industrial;
- construction/demolition;
- low level radioactive;
- agricultural;
- hazardous; and
- waste water.

5.22 Local plans should not generally prescribe the waste management techniques or technologies that will be used to deal with specific waste streams in the area (i.e. waste Local Plans should be 'technology blind'). Rather, the Plan should identify the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area. The government tries not to direct towards one waste technology above any others, when there may be a number of technologies, both existing and developing, that might deliver the same favourable outcome.

5.23 Waste planning authorities should engage and collaborate with local communities in an early and meaningful way when identifying options for managing waste. This is particularly the case when considering proposals for waste management facilities such as incinerators which can be locally controversial. To be effective, engagement should be proactive to ensure that local communities are able to understand the range of options that are available and their implications.

5.24 The PPG emphasises that waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place.

Planning (Listed Buildings and Conservation Areas) Act 1990

5.25 The Planning (Listed Buildings and Conservation Areas) Act changed laws relating to the granting of planning permission for building works, with a particular focus on listed buildings and conservation areas. It provides specific protection for buildings and areas of special architectural or historic interest and introduced special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as for Conservation Areas.

Ancient monuments and Archaeological Areas Act 1979

5.26 The Ancient monuments and Archaeological Areas Act 1979 provides specific protection for monuments of national interest

London context

London Environment Strategy

5.27 The Mayor's London Environment Strategy (GLA, May 2018) sets out the following overarching objectives for waste:

- Objective 7.1: Drive resource efficiency to significantly reduce waste, focusing on food waste and single use packaging waste;

[28] National Planning Practice Guidance (PPG) on waste is available at https://www.gov.uk/guidance/waste#preparing-local-plans

- Objective 7.2: Maximise recycling rates;
- Objective 7.3: Reduce the environmental impact of waste activities; and
- Objective 7.4: Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.

5.28 The Environment Strategy seeks to reduce reliance on landfill and incineration by working towards a 'circular economy'. This radical change in dealing with London's waste will include:

- significantly cutting waste that is produced, with a focus on single use plastics and food waste;
- encouraging greater reuse of materials to minimise the use of virgin resources, including accelerating the take up of business models that promote the circular economy;
- once waste reduction and reuse opportunities have been exhausted, maximising the recycling of materials (including anaerobic digestion) that are left from our homes and businesses;
- where all opportunities to reduce, reuse and recycle materials have been exhausted, maximising the value of truly non-recyclable waste by generating low carbon energy from it to limit the environmental impact, and leave very little waste going to landfill; and
- ensuring that there is sufficient infrastructure in London to support the shift to a circular approach, helping to create opportunities for businesses developing reuse, repair and remanufacturing services

5.29 Updated targets for recycling are set out which are due to be taken forwad in the new London Plan due for publication later in 2020:

- no biodegradable or recyclable waste to landfill by 2026; and
- 65% of 'municipal' (household and business) waste recycled by 2030, comprising 50% LACW recycled by 2025; and 75% business recycled by 2030.

5.30 Importantly, modelling undertaken on behalf of the Mayor suggests that if London achieves the reduction and recycling targets set out in the Environment Strategy, it will have sufficient energy from waste (EFW) capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational (see Objective 7.4). :

London Plan 2016

5.31 The London Plan (GLA, March 2016) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan. Land to manage borough apportionments should be brought forward through protecting and facilitating the maximum use of existing waste sites. Boroughs are encouraged to collaborate by pooling their apportionment requirements.

5.32 As shown below in Table 5.1, the current apportionment target for the four South London boroughs by 2021 is 669,000 tpa.

Table 5.1: London Plan 2016 apportionment targets for South London (tonnes per annum)

	Apportionment 2021	Apportionment 2036
Croydon	199,000	247,000
Kingston	119,000	148,000
Merton	192,000	239,000
Sutton	159,000	198,000
SLWP	**669,000**	**832,000**

5.33 Many of the waste targets in the current London Plan have been superseded by the London Environment Strategy (see above). For example, recycling targets for local authority collected waste (LACW) and commercial and industrial (C&I) waste have been pushed back from 2020 to 2025 and 2030 respectively.

Draft New London Plan 2020

5.34 The Intend to Publish London Plan (GLA, December 2019) sets out the following revised targets waste which reflect those set out in the London Environment Strategy:

- the equivalent of 100% of London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

5.35 New apportionment targets[29] for each borough are introduced in Table 9.2 under draft Policy SI8 on 'Waste Capacity and Net Self-Sufficiency' in order to meet the net self-sufficiency target for household and C&I waste. It can be seen from Table 5.2 that the combined apportionment targets for South London from 2021 to 2041 are higher than those set by the current London Plan 2016.

Table 5.2: Intend to Publish London Plan 2019 apportionment targets for South London (tpa)

	Apportionment 2021	Apportionment 2041
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
SLWP	**887,000**	**944,000**

5.36 Draft London Plan Policy SI8 has been updated to align with the NPPW approach to identifying sites and/or areas to meet identified waste management need. In addition, the definition of managed waste has been extended to include the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum. This increases the amount of existing capacity which counts towards managing apportioned waste.

5.37 The supporting text to draft Policy SI8 makes clear that boroughs are expected to identify suitable additional capacity for those waste streams not apportioned by the London Plan, where practicable.

London Infrastructure Plan (update 2015)[30]

5.38 The London Infrastructure Plan 2015 'Moving from waste to reuse' seeks to move away from the 'take-make-dispose' economy towards a more sustainable future where goods are designed to be reused and recycled as part of the so-called circular economy. The plan sets out a commitment to embedding circular economy principles across all areas of infrastructure delivery in London.

5.39 The GLA and the London Water and Recycling Board (LWARB) have developed a Route Map for London's transition to a circular economy[31]. This identifies the need for London's waste authorities,

[29] the evidence base underlying the revised apportionments are set out in 'Forecasts for Household and C&I Waste: Report 1' (SLR, March 2017) (NLP/SI/003) at https://www.london.gov.uk/sites/default/files/forecasts_for_household_and_commercial_industrial_waste_report_1_-_gla_waste_arisings_model.pdf

[30] the London Infrastructure Plan 2015 is available at file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20(1).pdf

[31] LWARB Circular Economy Route map at https://www.lwarb.gov.uk/what-we-do/circular-london/circular-economy-route-map/

with assistance from the LWARB, to introduce more consistent collection and recycling services that will help to increase the capture of materials from individuals and businesses. Improved waste collection is needed, both under the current system and to support the circular economy. Circular economy principles can also be promoted by designing waste out of manufactured products, so that they can be disassembled and reused with the minimum of effort and energy.

5.40 The estimated economic benefits of accelerating London's move to a circular economy include:

- reduced costs of up to £5 billion from 2016 to 2050;
- a new economic sector bringing employment opportunities and sparking innovation;
- the increased ability of industry to hedge its exposure to global commodity price volatility and supply disruption by reusing waste materials ;
- reduced toxic waste;
- reduced wider impacts, for example on transport. With a move to a circular economy, London is likely to require much less waste disposal infrastructure by 2050; and
- around 40 new facilities in addition to London's existing capacity. Most of them will be required to help reuse and recycle materials, predominantly repair workshops, disassembly lines and recycling and reprocessing facilities.

5.41 The move towards a circular economy is already underway across London, with many companies already prospering as a result of it. It is clear that for companies to reuse resource inputs to the maximum degree, they need to increase the rate at which their products and components are collected and reused with materials recovered.

The Mayor's Sustainable Design and Construction SPG

5.42 The Mayor's supplementary planning guidance (SPG) on 'Sustainable Design and Construction' (GLA, 2014)[32] sets out best practice guidance on circular economy principles aimed at reducing waste, increasing recovery from demolition materials, maximising pre-fabricated elements and providing sufficient space for storing recyclables and residual waste ready for collection. This will be superseded upon adoption of the New London Plan and the Mayor's Circular Economy Statement.

The Mayor's Municipal Waste Management Strategy 2011

5.43 The Mayor's Municipal Waste Management Strategy[33] (GLA, 2011) was produced by the previous Mayor and has been replaced by the London Environment Strategy 2017.

The Greater London Historic Environment Record

5.44 The Greater London Historic Environment Record (GLHER) provides some of the most up-to-date information on London's historic environment.

Local context

South London Waste Plan 2012

5.45 The South London Waste Plan (SLWP) (March 2012) sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within the four partner boroughs until 2022. It identifies 27 existing permitted facilities, 11 industrial areas suitable for new waste facilities and sets out policies for determining planning applications relating to waste facilities. The SLWP forms part of the local development plan for each of the partner boroughs.

[32] https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf
[33] the Mayor's Municipal Waste Management Strategy 2011 is available at https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-municipal-waste-management-strategy

5.46 The current SLWP plan period is now coming to an end and a new waste plan for south London is required in order to meet the updated apportionment and new waste management targets set out in both the draft new London Plan and the London Environment Strategy (see above).

South London Waste Partnership Joint Municipal Waste Strategy (2011)

5.47 The South London Waste Partnership is the disposal authority for household waste collected by the South London Boroughs. The Partnership's Joint Municipal Waste Strategy (2011) is a statement of intent to guide the authorities in undertaking their individual waste management activities. It covers the period from 2010 to 2020 and includes a strategic goal, objectives and a number of measurable targets.

London Borough of Croydon

5.48 Policy SP6 of Croydon's Local Plan (February 2018) identifies the current SLWP as the key delivery vehicle for waste planning and commits to working in partnership with Kingston, Merton and Sutton to plan for waste across the South London area. Strategic Objective 9 seeks to ensure the responsible use of land and natural resources and management of waste in order to mitigate and adapt to climate change. Policy DM13 requires developers to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design.

Royal Borough of Kingston-upon-Thames

5.49 Policy CS9 of Kingston's Core Strategy (April 2012) sets out strategic waste management priorities and targets for the borough and commits to working in partnership with Croydon, Merton and Sutton to plan for waste across the South London area. Core Strategy Objective 4 seeks to promote sustainable waste management within the four-borough waste partnership by preparing a Joint Waste Plan to identify suitable waste management sites to meet the London Plan apportionment, safeguard existing sites and set out appropriate planning policies to ensure high standards of development.

London Borough of Merton

5.50 Policy CS17 of Merton's Core Planning Strategy (July 2011) sets out strategic priorities and targets for the borough and commits to working in partnership with Croydon, Kingston and Sutton to plan for waste across the South London area. Strategic Policy 1 seeks to apply the waste hierarchy and exploit opportunities to utilise energy from waste.

5.51 Merton's emerging (Stage 2) Local Plan (October 2018) includes an updated strategic policy which identifies the SLWP as the key delivery vehicle for waste planning. Strategic Objective 4 aims to apply the waste hierarchy and exploit opportunities to utilise energy from waste. Policies CC8.10 and CC8.15 both include a commitment to support the principles of the circular economy.

London Borough of Sutton

5.52 Sutton's Local Plan (February 2018) does not include a specific policy for waste, but instead defers to the current SLWP in the supporting text for Policy 14 on 'Industrial Land'.

5.53 Policy 15 states that the council will support proposals from green business where they are suitable for the location proposed.

6. Baseline (Task A2)

What is baseline information?

6.1 The term 'baseline information' refers to the existing environmental, economic and social characteristics of the plan area, and their likely direction of change without any change to current planning policies. The information set out in this chapter has been used as part of the scoping process as the basis for identifying the key issues and problems to be addressed by the new South London Waste Plan (SLWP) (Section 7) and for developing the proposed SA Framework as the basis for assessing the likely impacts of alternative policy options on the social, economic and environmental objectives of sustainable development (Section 8).

6.2 The revised NPPF (MHCLG, 2019) emphasizes that an up-to-date evidence base is essential for producing a sound development plan document (DPD). The environmental, social and economic baseline set out below is therefore derived from the following sources:

- Authority Monitoring Reports (AMRs) for 2018-19 prepared by the respective boroughs;
- studies undertaken by the four boroughs or by consultants as part of the evidence base for the Local Plan including employment land reviews, open space studies, infrastructure studies and Strategic Flood Risk Assessment (SFRA);
- studies undertaken by the GLA or by consultants as part of the evidence base for the new London Plan, including the London Industrial Land Demand Study (CAG, 2017);
- the London Employment Sites database;
- development monitoring data via the London Development Database;
- socio-economic and environmental information from the GLA London Datastore, including borough population and household projections; and
- mid-year estimates and population data from the Office for National Statistics.

6.3 This chapter provides a summary of the current baseline situation in terms of the key environmental, social and economic trends likely to be affected by the new plan.

The Plan Area

6.4 The South London Waste Plan area, consisting of the four boroughs of Kingston-upon-Thames, Sutton, Merton and Croydon, is shown in Figure 6.1. While there are pockets of social deprivation, the area as a whole is relatively prosperous and noted for its high environmental quality.

6.5 According to the latest mid-year estimates published by the Office of National Statistics (ONS) in 2019, the combined population of the four SLWP boroughs reached a total of 971,527 in mid 2018, representing an increase of 58,250 (+6.4%) since the 2011 Census. According to the GLA's housing-led projections[34], updated in February 2020, this population is expected to increase by 100,167 or +10.1% from a total of 988,295 in 2021 to 1,088,462 by 2036.

6.6 In terms of the future spatial development of the four partner boroughs, the draft new London Plan identifies Opportunity Areas centred upon each of the three Metropolitan Centres of Croydon, Sutton and Kingston together with a further Opportunity Area at Wimbledon/ Colliers Wood/ South Wimbledon. Each of these areas of change is expected to be a focus for significant growth and economic regeneration over the lifetime of the plan to 2041. However the ability of these Opportunity

[34] the GLA's latest housing-led population (2018-based) population projections are available at https://data.london.gov.uk/dataset/housing-led-population-projections

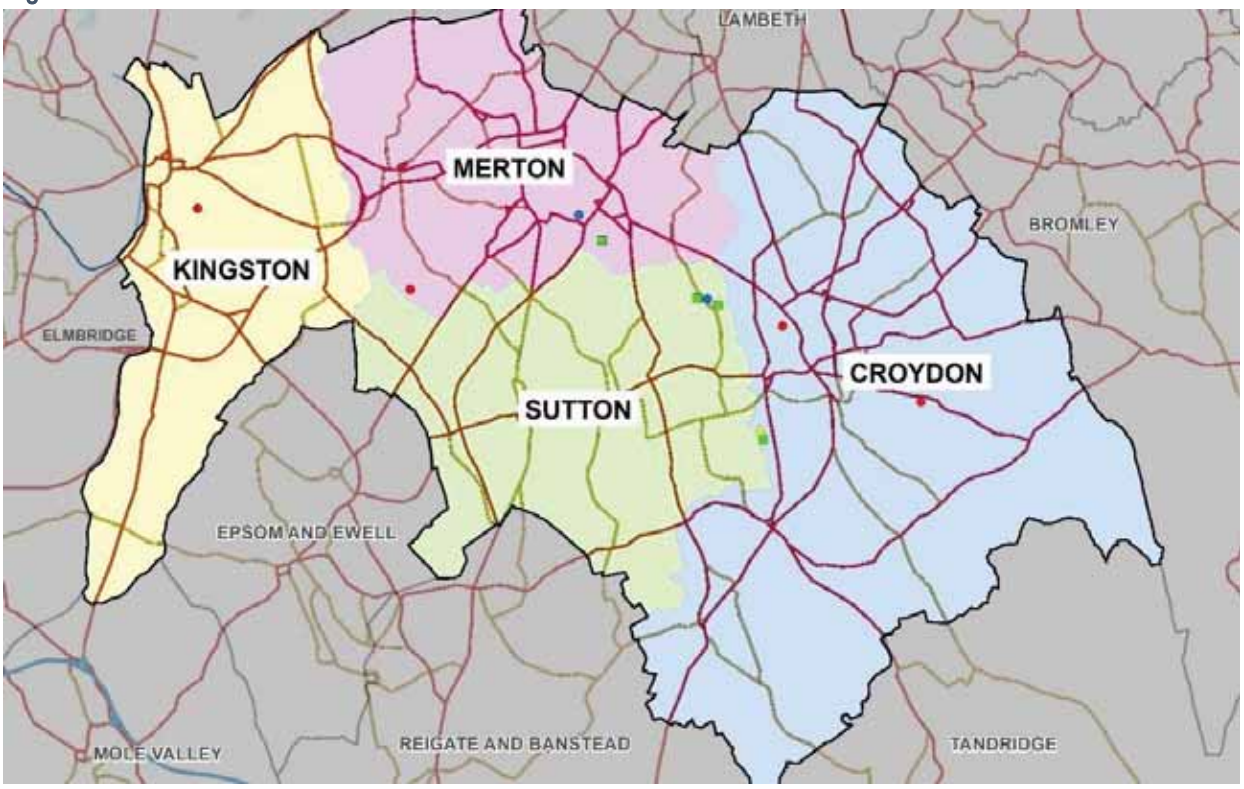
Area areas to accommodate the additional housing and jobs needed over the coming decades will require major investment in strategic transport infrastructure, namely Crossrail 2 and the Tramlink extension.

6.7 The importance of Tramlink as one of the Mayor's Strategic Infrastructure Priorities is reflected in the Key Diagram of the draft new London Plan which identifies Croydon, Sutton and Wimbledon town centres as key elements of the 'Trams Triangle'. Tramlink has already transformed travel opportunities within South London and the proposal to extend the tram to Sutton Town Centre and potentially beyond to the proposed London Cancer Hub (LCH) provides the potential for improving transport accessibility to the town centre and supporting the delivery of additional homes and jobs. The 'Trams Triangle' provides important links to central London and Gatwick via the Brighton mainline and, in the future, Crossrail 2. There are also important links to the east and west, where improved transport connections to Heathrow will be beneficial for places to the west of South West London

6.8 The plan area contains a total of 780 ha of designated industrial land, including 10 Strategic Industrial Locations (SILs), as well as numerous smaller sites. As of 2017, 35 ha of this land (4.5%) was vacant. Many businesses, particularly in the Wandle Valley, are in a supply-chain relationship with the central London economy. Although development opportunities in outer London tend to be concentrated in the town centres and are smaller by comparison with Inner London boroughs, the Wandle Valley corridor offers diverse regeneration potential, including the Wimbledon/ Colliers Wood/ South Wimbledon Opportunity Area. There is also a Strategic Office Location at Croydon Town Centre.

6.9 There is a total of 3,439 ha of green belt and 2,458 ha of Metropolitan Open Land (MOL) in the plan area. This accounts for 28.7% of the land area of the four boroughs.

Figure 6.1: The South London Waste Plan Area.



London Borough of Croydon

6.10 The London Borough of Croydon has an area of 8,650 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Croydon reached a total of 383,838 in mid 2018.

6.11 There is a total of 163.0 ha of designated industrial land within the borough, of which 9.6 ha (5.9%) is currently vacant. There are two Strategic Industrial Locations (SILs) at Marlpit Lane and Imperial Way/ Purley Way, accounting for 118.6 ha.

6.12 With over 380 retail outlets, Croydon Town Centre is one of four Metropolitan Centres in South London, and has been identified as both an Opportunity Area and a Strategic Office Location in the draft new London Plan. Croydon Town Centre is supported by nine district centres at Addiscombe, Coulsdon, New Addington, Norbury, Purley, Selsdon, South Norwood,Thornton Heath, Upper Norwood/ Crystal Palace.

6.13 Croydon is well located near to Gatwick Airport and within easy reach of central London and the south coast.

6.14 Croydon has 2,195 ha of Green Belt and 413 ha of MOL, together accounting for 30.2% of the land area of the borough.

Royal Borough of Kingston-upon-Thames

6.15 The Royal Borough of Kingston-upon-Thames has an area of 3,726 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Kingston reached a total of 174,978 in mid 2018. Kingston's predominant character is of leafy suburbs with relatively low density development of two or three-storey houses with gardens, though there are some higher density neighbourhoods, mainly around Kingston and Surbiton town centres and along major roads.

6.16 Kingston Town Centre is a Metropolitan Centre and identified as an Opportunity Area in the draft new London Plan. There are three district centres: New Malden in the east, Surbiton just south of Kingston, and Tolworth close to the A3. The council has identified four areas where there is scope for accommodating additional growth, at Kingston Town Centre; Norbiton, London Road and Cambridge Estate; New Malden and Tolworth.. However, with the introduction of Crossrail 2 is operational, the borough is expected to benefit from more Crossrail 2 stations than any other and the arrival of the new, higher frequency, higher capacity service will enable significant additional growth opportunities in these areas. It will improve Kingston's attractiveness as an office location and therefore support additional commercial growth in the town centre, building on links with Kingston University and Kingston College.

London Borough of Merton

6.17 Merton is the one of the smallest boroughs in London with an area of 3,762 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Merton reached a total of 210,327 in mid 2018.

6.18 Crossrail 2 and associated investment are expected to have a significant impact on the future regeneration and growth of Merton. This will help support the delivery of housing, mixed-use and commercial development across the borough and the opportunity areas located within it. The step change in transport capacity and connectivity offered by Crossrail 2 is expected to transform

Wimbledon into a major transport hub with opportunities for interchange with National Rail, trams and the Underground.

6.19 The redevelopment required to deliver the Crossrail 2 tunnel offers the opportunity to plan for significant growth and intensification, with residential and commercial development. Crossrail 2 will strengthen Wimbledon's role as a 'major town centre', and as a location with potential for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres.

6.20 Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 18% of the borough's area is open space, compared to the 10% London average. The quality and historical character of the borough reflects the number of high quality heritage areas designated as Conservation Areas.

London Borough of Sutton

6.21 The London Borough of Sutton (4,485 ha) forms an important part of the Wandle Valley, one of three growth corridors identified as having 'city region importance' in the current London Plan 2016. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Sutton reached a total of 204,775 in mid-2018.

6.22 Industrial activity is concentrated in the Borough's established industrial areas, three of which are identified as strategic industrial locations (SILs). These are Kimpton, Beddington and a small part of the Purley Way SIL. Each of these is served by key radial routes into London from the M25. Elsewhere, a number of smaller industrial sites are being transformed in housing developments, for example the Felnex Trading Estate and Wandle Valley Trading Estate in Hackbridge

6.23 Sutton Town Centre is one of four Metropolitan Centres in South London and an Opportunity Area in the draft new London Plan. The town centre has 188 retail units within an attractive pedestrianised environment. Sutton Town Centre is complemented by seven district centres, at Cheam, North Cheam, Wallington, Worcester Park, Hackbridge, Rosehill and Carshalton, along with many local centres and dispersed parades.

6.24 Sutton has a number of high quality heritage areas designated as Conservation Areas and Areas of Special Local Character (ASLCs). In contrast, there are pockets of relative social deprivation, characterised by limited access to employment, social infrastructure and transport services, including areas to the north of the Borough, such as Rosehill, St Helier and the Wrythe, and parts of South Beddington.

POPULATION

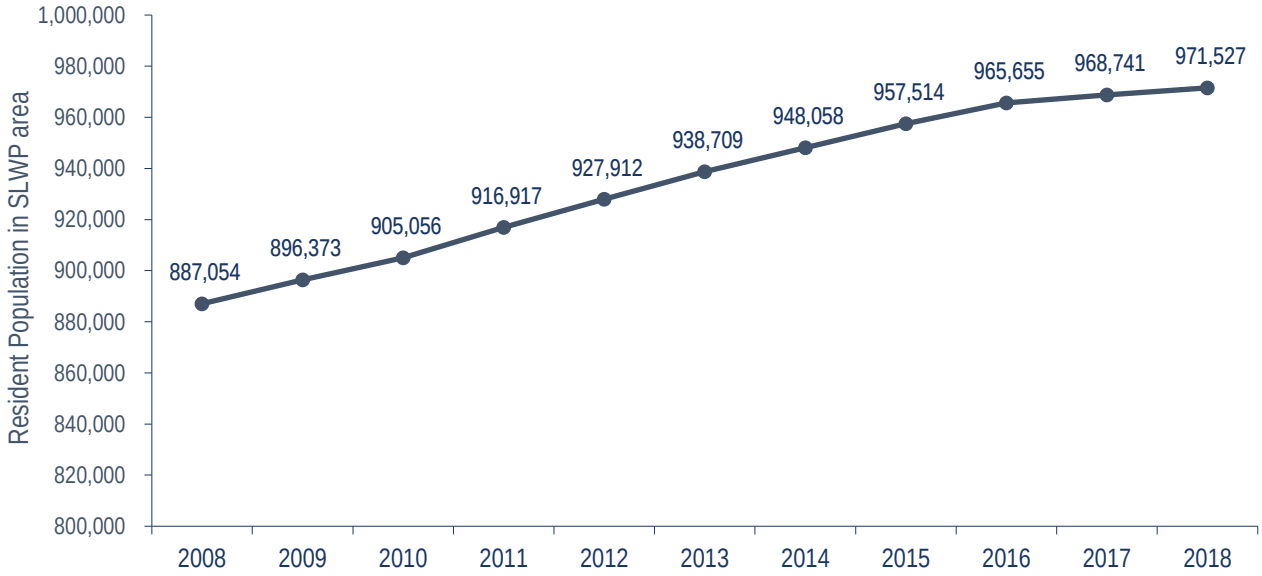
Resident population

Table 6.1: Resident Population for SLWP boroughs and plan area

	Population mid-2017	Population mid-2018	Births
Croydon	384,837	385,346	+5,582
Kingston	174,609	175,470	+2,089
Merton	206,052	206,186	+3,160
Sutton	203,243	204,525	+2,533
SLWP	**968,741**	**971,527**	+13,364

Source: ONS Mid-Year Estimates (26 June 2019)

Figure 6.2: Population growth in the SLWP area 2008-18



Components of population change 2017 to 2018

Table 6.2: Components of population change for SLWP boroughs and the plan area

	Population mid-2017	Population mid-2018	Births	Deaths	Net Migration	Overall Net change
Croydon	384,837	385,346	+5,582	-2,564	-2,509	**+509**
Kingston	174,609	175,470	+2,089	-1,108	-120	**+861**
Merton	206,052	206,186	+3,160	-1,287	-1,739	**+134**
Sutton	203,243	204,525	+2,533	-1,545	294	**+1,282**
SLWP	**968,741**	**971,527**	+13,364	-6,504	-4,074	**+2,786**

Source: ONS Mid-Year Estimates (26 June 2019)

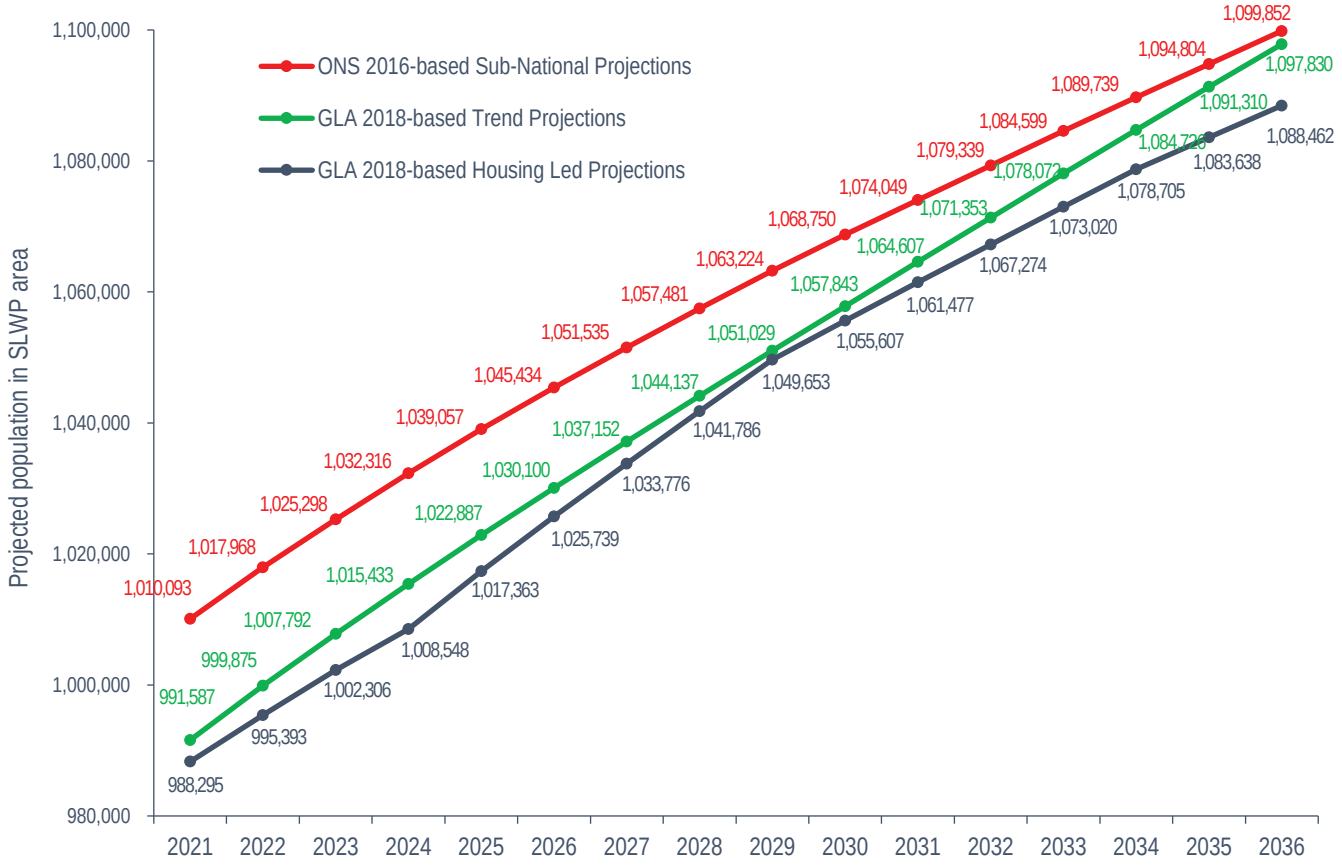
Population projections

Table 6.3: Population projections for SLWP boroughs and plan area 2021-36

	Population Projections								
	GLA 2018-based Housing Led[35]			GLA 2018-based Central Trend[36]			ONS 2016-based Subnational Projections		
	2021	2036	Change	2021	2036	Change	2021	2036	Change
Croydon	391,463	436,023	+44,560 (+11.4%)	389,681	427,936	+38,255 (+9.8%)	400,227	436,252	+36,024 (+9.0%)
Kingston	177,502	206,226	+28,724 (+16.2%)	178,748	200,221	+21,473 (+12%)	185,017	205,061	+20,045 (+10.8%)
Merton	212,413	229,298	+16,885 (+7.95%)	214,549	237,457	+22,908 (+10.7%)	212,915	225,972	+13,057 (+6.1%)
Sutton	206,917	216,915	+9,998 (+4.8%)	208,609	232,216	+23,607 (+13.0%)	211,933	232,566	+20,633 (+9.7%)
SLWP	**988,295**	**1,088,462**	**+100,167** (+10.1%)	**991,587**	**1,097,830**	**+106,243** (+11.3%)	1,010,093	1,099,852	**+89,759** (+8.9%)

Sources: GLA 2018-based Trend Projections; GLA 2018-based Housing Led Projections (both updated Feb 2020); and ONS 2016-based Population Projections

Figure 6.3: Population projections for SLWP boroughs and plan area 2021-36



Sources: GLA 2016-based Trend; GLA 2016-based Housing-Led; and ONS 2016-based population projections

[35] GLA 2018-based housing-led projections incorporating the 2016 Strategic Housing Land Availability Assessment (SHLAA) at https://data.london.gov.uk/dataset/housing-led-population-projections

[36] GLA 2018-based central trend population projections are available on the London Datastore at https://data.london.gov.uk/dataset/trend-based-population-projections

Population structure

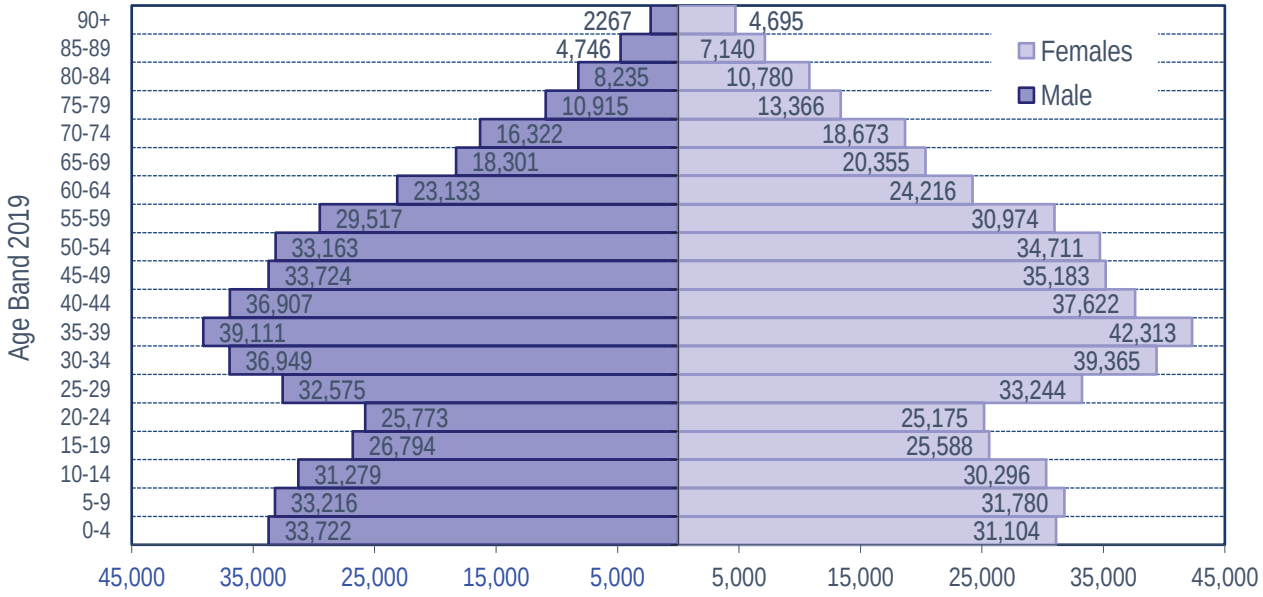
Table 6.4: Population structure for SLWP boroughs and plan area 2019

	Resident Population 2019			
	Age band	Males	Females	All persons
Croydon	Borough residents aged 0-15	42,104 (22.6%)	40,478 (20.5%)	**82,582 (21.5%)**
	Borough residents aged 16-64	120,450 (64.6%)	127,654 (64.7%)	**248,104 (64.6%)**
	Borough residents aged 65+	23,865 (12.8%)	29,287 (14.8%)	**53,152 (13.9%)**
	Total	**186,419**	**197,419**	**383,838**
	Age band	Males	Females	All persons
Kingston	Borough residents aged 0-15	16,801 (19.4%)	16,488 (18.6%)	**33,289 (19%)**
	Borough residents aged 16-64	58,605 (67.8%)	58,416 (66%)	**117,021 (66.9%)**
	Borough residents aged 65+	11,099 (12.8%)	13,571 (15.4%)	**24,670 (14.1%)**
	Total	**86,505**	**88,475**	**174,980**
	Age band	Males	Females	All persons
Merton	Borough residents aged 0-15	23,074 (23.8%)	21,844 (20.5%)	**44,918 (22.1%)**
	Borough residents aged 16-64	62,029 (64.1%)	70,046 (65.8%)	**132,075 (65%)**
	Borough residents aged 65+	11,739 (12.1%)	14,595 (13.7%)	**26,334 (12.9%)**
	Total	**96,842**	**106,485**	**203,327**
	Age band	Males	Females	All persons
Sutton	Borough residents aged 0-15	21,983 (22%)	20,688 (19.7%)	**42,671 (20.8%)**
	Borough residents aged 16-64	63,817 (63.9%)	66,668 (63.6%)	**130,485 (63.7%)**
	Borough residents aged 65+	14,084 (14.1%)	17,535 (16.7%)	**31,619 (15.5%)**
	Total	**99,884**	**104,891**	**204,775**

	Age band	Males	Females	All persons
SLWP area	Residents aged 0-15	103,962 (22.2%)	99,498 (20%)	**203,460 (21%)**
	Residents aged 16-64	304,901 (64.9%)	322,784 (65%)	**627,685 (65%)**
	Residents aged 65+	60,787 (12.9%)	74,988 (15%)	**135,775 (14%)**
	Total	469,650	497,270	**966,920**

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 6.4: Population structure by gender and age band for the plan area 2019



Projected Change in Population Structure

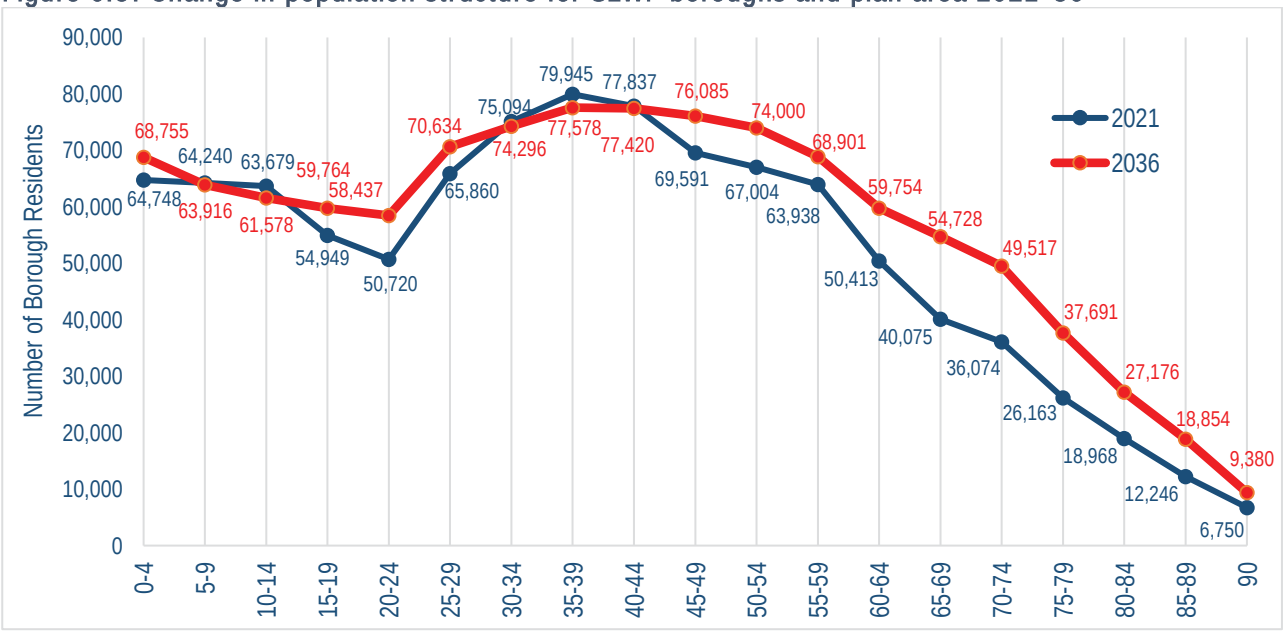
Table 6.5: Change in population structure for SLWP boroughs and plan area 2021-36

	Resident Population			
	Age band	All persons 2021	All persons 2036	Projected change
Croydon	Borough residents aged 0-15	82,921	84,572	**+1,651** (+2%)
	Borough residents aged 16-64	253,102	270,057	**+16,955** (+6.7%)
	Borough residents aged 65+	55,440	81,394	**+25,954** (+46.8%)
	Total	**391,463**	**436,023**	**+44,560** (+11.4%)
	Age band	All persons 2021	All persons 2036	Projected change
Kingston	Borough residents aged 0-15	33,463	35,196	**+1,733** (+5.2%)
	Borough residents aged 16-64	118,660	134,831	**+16,171** (+13.6%)
	Borough residents aged 65+	25,379	36,198	**+10,819** (+42.6%)
	Total	**177,502**	**206,225**	**+28,723** (+16.2%)
	Age band	All persons 2021	All persons 2036	Projected change
Merton	Borough residents aged 0-15	44,945	44,476	**-469** (-1%)
	Borough residents aged 16-64	140,434	148,264	**+7,830** (+5.6%)
	Borough residents aged 65+	27,034	36,558	**+9,524** (+35.2%)
	Total	**212,413**	**229,298**	**+16885** (+7.9%)
	Age band	All persons 2021	All persons 2036	Projected change
Sutton	Borough residents aged 0-15	43,230	42,325	**-905** (-2.1%)
	Borough residents aged 16-64	131,263	131,393	**+130** (+0.1%)
	Borough residents aged 65+	32,423	43,196	**+10,773** (+33.2%)
	Total	**206,916**	**216,914**	**+9,998** (+4.8%)

	Age band	All persons 2021	All persons 2036	Projected change
SLWP area	Residents aged 0-15	204,559	206,569	**+2,010** (+1%)
	Residents aged 16-64	643,459	684,545	**+41,086** (+6.4%)
	Residents aged 65+	140,276	197,346	**+57,070** (+40.7%)
	Total	**988,294**	**1,088,460**	**+100,166** (+10.1%)

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 6.5: Change in population structure for SLWP boroughs and plan area 2021-36



Population density

Table 6.6: Population density

	Population mid-2018	Area (ha)	Population density (residents/ha)
Croydon	385,346	8,650	44.5
Kingston	175,470	3,726	47.1
Merton	206,186	3,762	54.8
Sutton	204,525	4,385	46.6
SLWP	**971,527**	**20,523**	**47.3**
London	8,908,081	159,471	55.9

Source: ONS Mid-Year Estimates (26 June 2019)

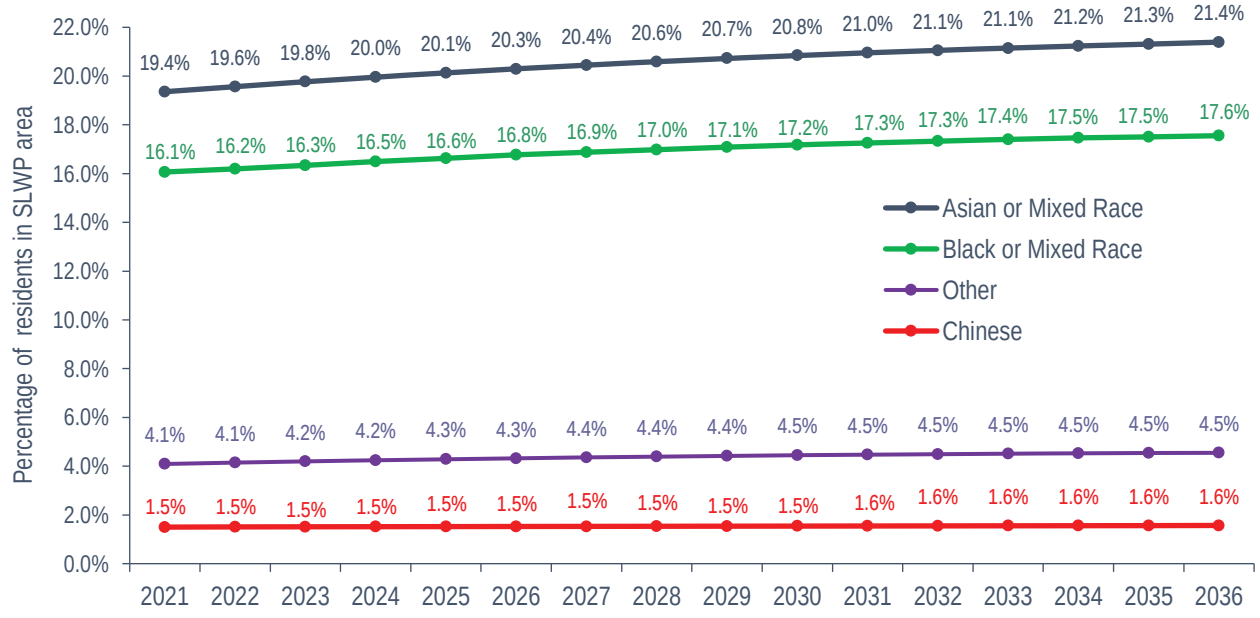
Ethnicity

Table 6.7: Ethnic breakdown for SLWP boroughs and plan area 2019

	White	Black and Minority Ethnic (BAME)	*Asian or Mixed Race*	*Black or Mixed Race*	*Other*	*Chinese*
Croydon	**188,737** (47.6%)	**207,812** (52.4%)	*76,805 (19.4%*	*109,216 (27.5%)*	*16,762 (4.2%)*	*5,029 (1.3%)*
Kingston	**121,925** (67.5%)	**58,673** (32.5%)	*36,758 (20.4%)*	*8,292 (4.6%)*	*9,520 (5.3%)*	*4,104 (2.3%)*
Merton	**133,098** (63.2%)	**77,354** (36.8%)	*42,749 (20.3%)*	*24,124 (11.5%)*	*7,561 (3.6%)*	*2,920 (1.4%)*
Sutton	**153,461** (73.2%)	**56,206** (26.8%)	*31,975 (15.3%)*	*15,833 (7.6%*	*5,686 (2.7%)*	*2,711 (1.3%)*
SLWP	**597,221** (59.9%)	**400,045** (40.1%)	*188,287 (18.9%)*	*157,465 (15.8%)*	*39,529 (4.0%)*	*14,764 (1.5%)*
London	**5,161,532** (56.7%)	**3,944,624** (43.3%)	*1,819,907 (20.0%)*	*1,442,062 (15.8%)*	*526,430 (5.8%)*	*156,224 (1.7%)*

Source: GLA Housing-led Ethnic Projections (November 2017)

Figure 6.6: Projected ethnic breakdown for plan area 2021-36



Religion

Table 6.8: Religion for SLWP boroughs and plan area 2019

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion
Croydon	49.3%	-	5.5%	-	8.8%	-	2.8%	33.6%
Kingston	41.9%	1.3%	6.1%	-	11.0%	-	2.2%	37.6%
Merton	51.7%	-	5.3%	-	6.1%	-	3.5%	33.3%
Sutton	48.8%	-	8.2%	-	7.3%	-	2.1%	33.6%
SLWP	**48.4%**	**0.2%**	**6.2%**	**0.0%**	**8.3%**	**0.0%**	**2.7%**	**34.3%**
London	44.5%	0.9%	5.2%	2.2%	14.2%	1.4%	2.3%	29.4%

Source: GLA Datastore – Annual Population Survey (June 2019)

Household growth

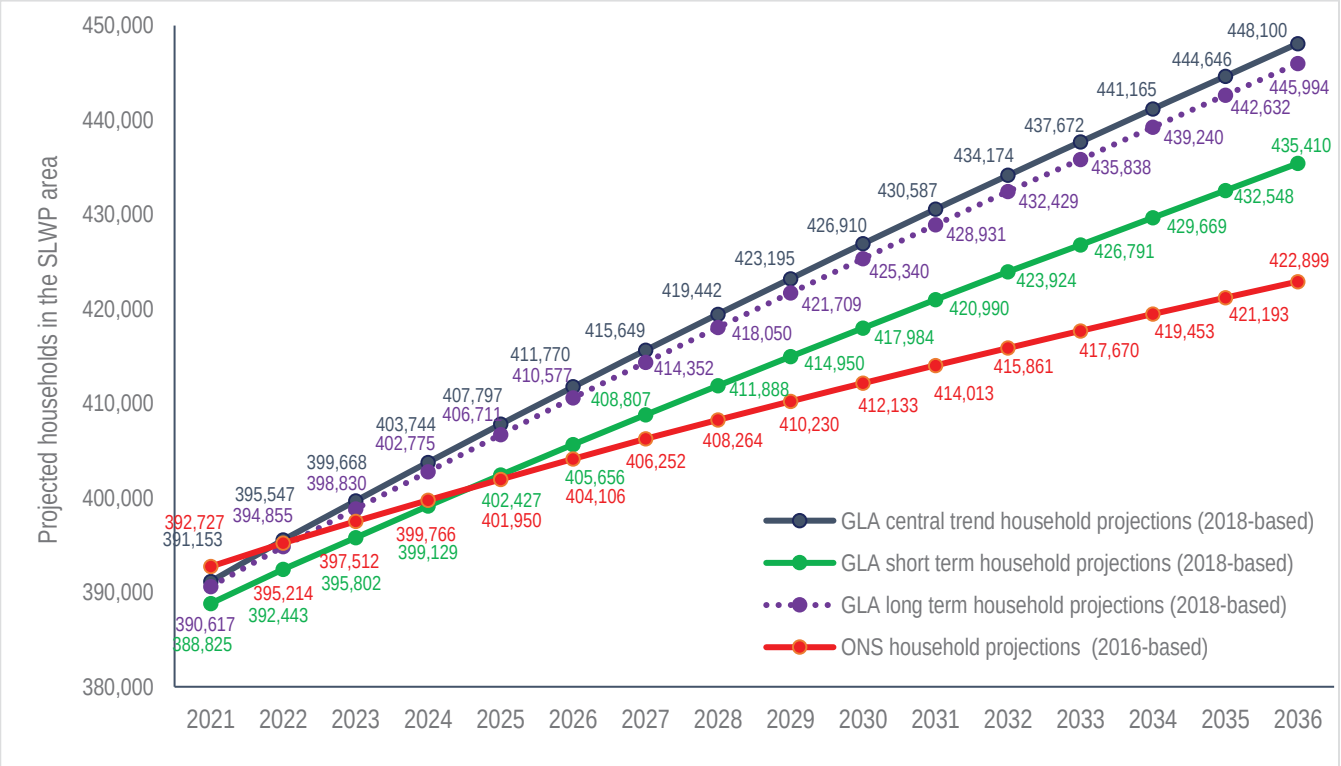
Table 6.9: Household growth within SLWP boroughs and plan area from 2011 to 2019

	Number of households		
	2011	2019	Change since 2011
Croydon	145,988	153,958	+7,970 (+5.5%)
Kingston	63,994	69,047	+5,053 (+7.9%)
Merton	79,157	80,188	+1,031 (+1.3%)
Sutton	78,661	82,820	+4,159 (+5.3%)
SLWP	**367,800**	**386,013**	**+18,213 (+5%)**

Sources: GLA Central Trend Projection 2018-based[37]

Household projections 2021-36

Figure 6.7: Household projections for plan area 2021-36



[37] the 'central' trend projection informs the London Plan and is considered by the GLA to be the most appropriate for medium to long-term strategic planning. This model is based on past trends in births, deaths and migration to project future populations in London using 10-year average domestic migration rates, international migration in-flows and international out-migration rates

Housing tenure by household

Table 6.10: Household tenure by household for SLWP boroughs and plan area

	Number of households				
	Own Outright	Mortgage	Rented from Council or Reg. Provider	Rented from private landlord	Total
Croydon	38,300 (26.2%)	54,100 (37%)	25,700 (17.6%)	28,200 (19.2%)	146,300
Kingston	21,800 (33.1%)	20,200 (30.6%)	6,200 (9.5%)	17,700 (26.9%)	65,900
Merton	23,400 (28.7%)	26,700 (32.8%)	10,200 (12.5%)	21,200 (26%)	81,500
Sutton	25,600 (32.8%)	28,400 (36.4%)	8,000 (10.3%)	16,000 (20.5%)	78,000
SLWP	**109,100** (29.3%)	**129,400** (34.8%)	**50,100** (13.5%)	**83,100** (22.4%)	**371,700**

Sources: ONS Annual Population Survey 2019

Car ownership

Table 6.11: Household tenure by household for SLWP boroughs and plan area

	Cars	Households	Cars per household	London ranking (out of 33 boroughs)
Croydon	141,122	153,958	0.92	13th (joint)
Kingston	66,239	69,047	0.96	8th (joint)
Merton	70,113	80,188	0.87	16th
Sutton	87,727	82,820	1.06	5th (joint)
SLWP	365,201	386,013	0.95	n/a
LONDON	2,661,026	3,553,413	0.75	n/a

Source: DVLA/DfT: Number of Licensed Vehicles (VEH0105) April 2020, and GLA Household Projections Central Trend 2018-based (2019)

Social deprivation

Table 6.12: Index of Multiple Deprivation (IMD 2019) - national ranking

	Social deprivation ranking compared to the 317 areas in England[38]		
	IMD 2015[39]	IMD 2019	Change 2015-19
Croydon	95th	**108th** most deprived in England	↓
Kingston	270th	**273rd** most deprived in England	↓
Merton	209th	**213th** most deprived in England	↓
Sutton	211th	**226th** most deprived in England	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 6.13: Index of Multiple Deprivation (IMD 2019) - London ranking

	Social deprivation ranking compared to the 33 London Boroughs		
	IMD 2015	IMD 2019	Change 2015-19
Croydon	17th	**15th** most deprived in London	↑
Kingston	32nd	**32nd** most deprived in London	No change
Merton	28th	**29th** most deprived in London	↓
Sutton	29th	**31st** most deprived in London	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

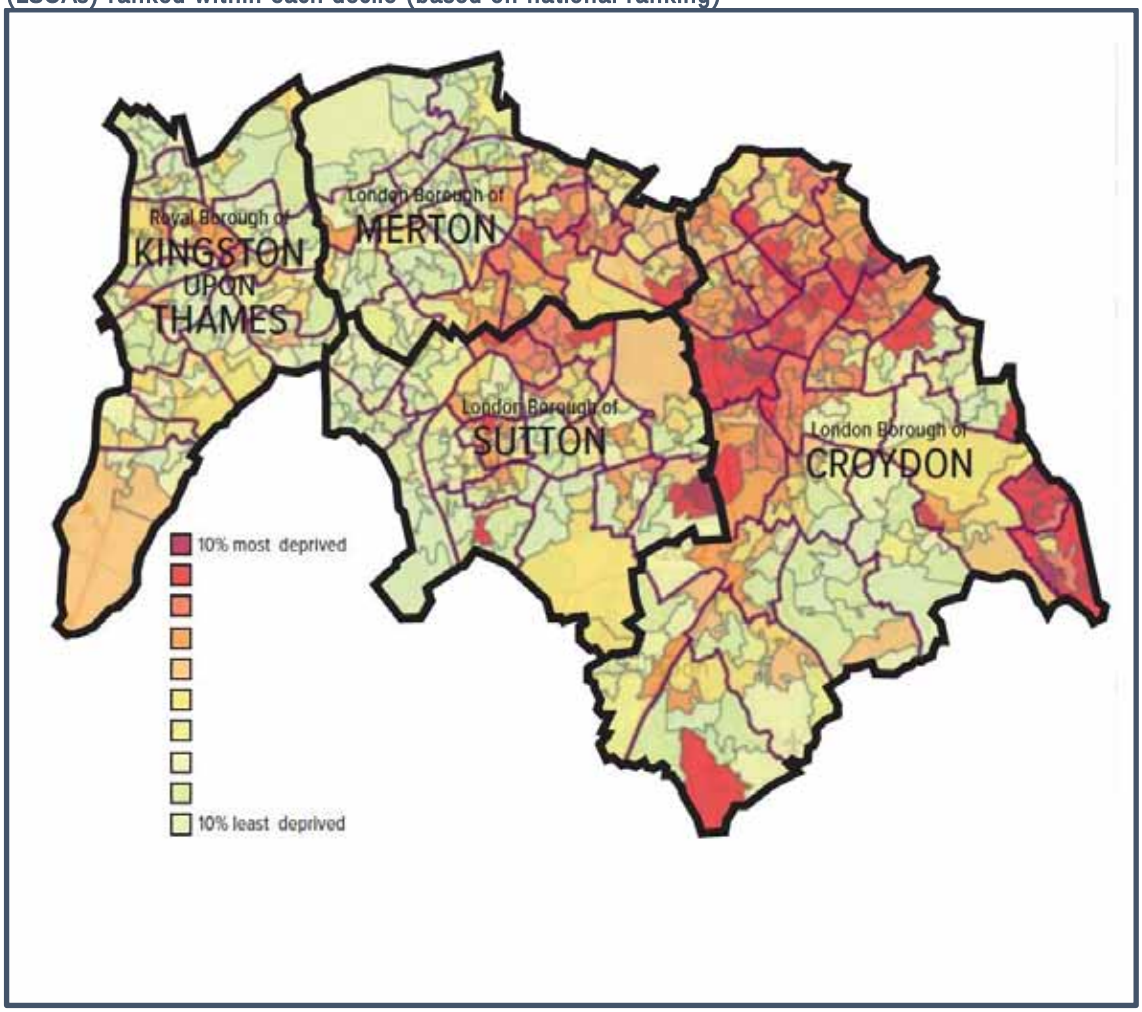
[38] based on IMD 2019 'rank of average score' (1st = most deprived and 317th = least deprived)
[39] 2015 data recast to 2019 lower tier (district) authorities following boundary changes

Table 6.14: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England

	IMD 2019 – Ranking of average score			
	LSOAs ranked in 10% most deprived	LSOAs ranked in 20% most deprived	LSOAs ranked in 10% least deprived	LSOAs ranked in 20% least deprived
Croydon	5	44	7	19
Kingston	0	1	13	38
Merton	0	3	22	41
Sutton	1	7	23	42

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Figure 6.8: Index of Multiple Deprivation (IMD 2015) map for SLWP area showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)



Fuel Poverty

Table 6.15: Percentage of fuel poor households for SLWP boroughs and plan area

	Households	Fuel Poor Households	Proportion of households who are fuel poor (%)
Croydon	152,205	17,108	11.2%
Kingston	66,817	6,955	10.4%
Merton	82,831	9,282	11.2%
Sutton	82,077	6,897	8.4%
SLWP	**383,930**	**40,242**	**10.5%**
LONDON	3,425,063	391,924	11.4%

Source: Sub-regional fuel poverty data, Department for Business, Energy & Industrial Strategy (BEIS) April 2020

ECONOMY

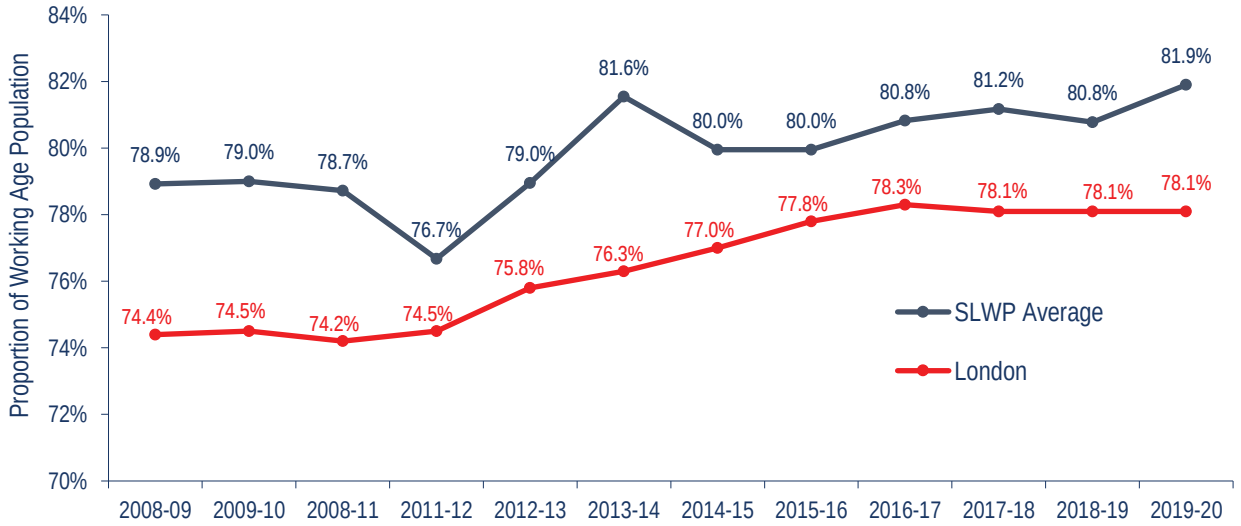
Economic activity

Table 6.16: Proportion of working age population aged 16-64 who are economically active

	Residents of working age (16-64)	Residents of working age (16-64) who are economically active	Proportion of working age (16-64) residents who are economically active
Croydon	247,800	205,800	83.1%
Kingston	115,800	99,000	85.5%
Merton	137,000	119,800	87.4%
Sutton	130,000	113,500	87.3%
SLWP	**630,600**	**538,100**	85.3%
LONDON	6,014,100	4,893,600	81.4%

Source: NOMIS website on behalf of ONS April 2020

Figure 6.9: Economically active residents aged 16-64 for plan area 2008-09 to 2018-19



Employment by occupation - economically active residents 16-64

Table 6.17: Employment by occupation for SLWP boroughs and plan area 2018-19

Occupation	Croydon	Kingston	Merton	Sutton	SLWP	LONDON
Managers and Senior Officials	11.7% (23,200)	18.1% (17,400)	14.5% (16,600)	10.5% (11,200)	**12.7% (68,400)**	13.5% (630,900)
Professional Occupations	22.4% (44,600)	28.1% (27,000)	24.5% (28,000)	24.1% (25,800)	**23.3% (125,400)**	26.5% (1,239,100)
Assc Professional & Technical	(31,900) 16.1%	19.7% (18,900)	18.8% (21,500)	(18,200) 17%	**16.8% 90,500)**	(854,400) 18.3%
Administrative and Secretarial	10% (19,800)	9.8% (9,400)	12.1% (13,800)	11.5% (12,300)	**10.3% (55,300)**	15.8% (408,200)
Skilled Trades	8.7% (17,200)	7% (6,700)	7.8% (8,900)	11.1% (11,800)	**8.3% (44,600)**	(325,400) 7.0%
Personal service (e.g. caring)	9.1% (18,000)	5.4% (5,200)	6.9% (7,900)	8.3% (8,900)	**7.4% (40,000)**	7.1% (332,100)
Sales/ Customer Services	7% (13,900)	4.1% (3,900)	5.1% (5,900)	5.2% (5,600)	**5.4% (29,300)**	5.7% (271,700)
Plant & Machines Operatives	3.4% (6,800)	3.1% (2,800)	4.4% (5,000)	5.4% (5,800)	**3.8% (20,400)**	4.5% (208,700)
Elementary Occupations	10% (19,800)	5.8% (5,600)	5.9% (6,700)	6.6% (7,100)	**7.3% (39,200)**	8% (375,900)

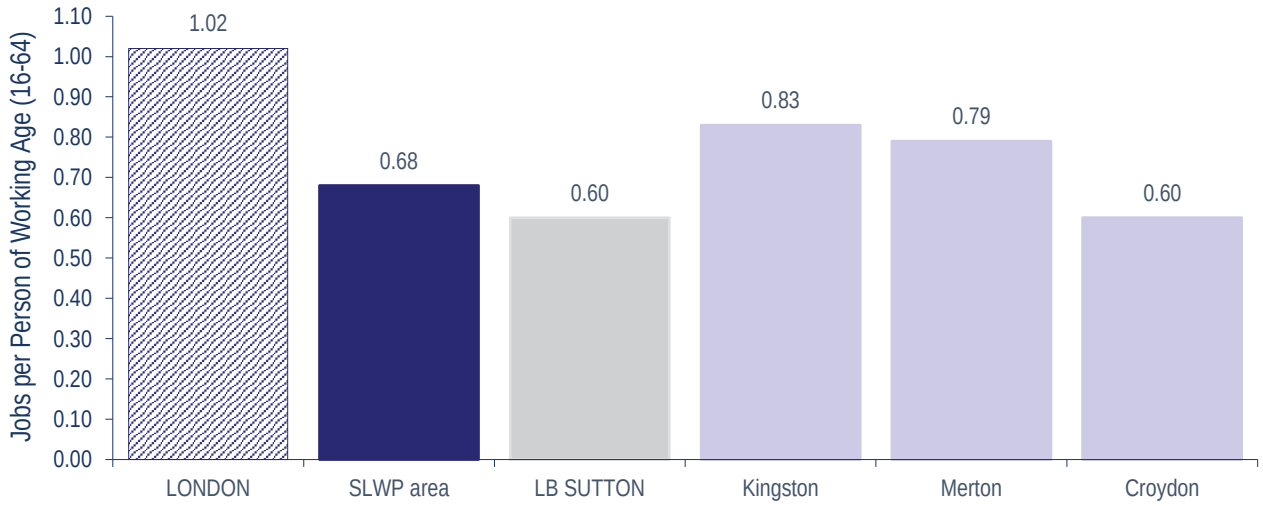
Job Density

Table 6.18: Employee jobs per resident of working age (16-64) for SLWP boroughs 2018

	Employee Jobs (full-time and part-time)	Residents aged 16-64	Job Density (Jobs/resident)
Croydon	149,000	247,800	0.6
Kingston	96,000	115,800	0.83
Merton	108,000	137,000	0.79
Sutton	78,000	130,000	0.6
SLWP	**431,000**	**630,600**	**0.68**
LONDON	6,149,000	4,893,600	1.02

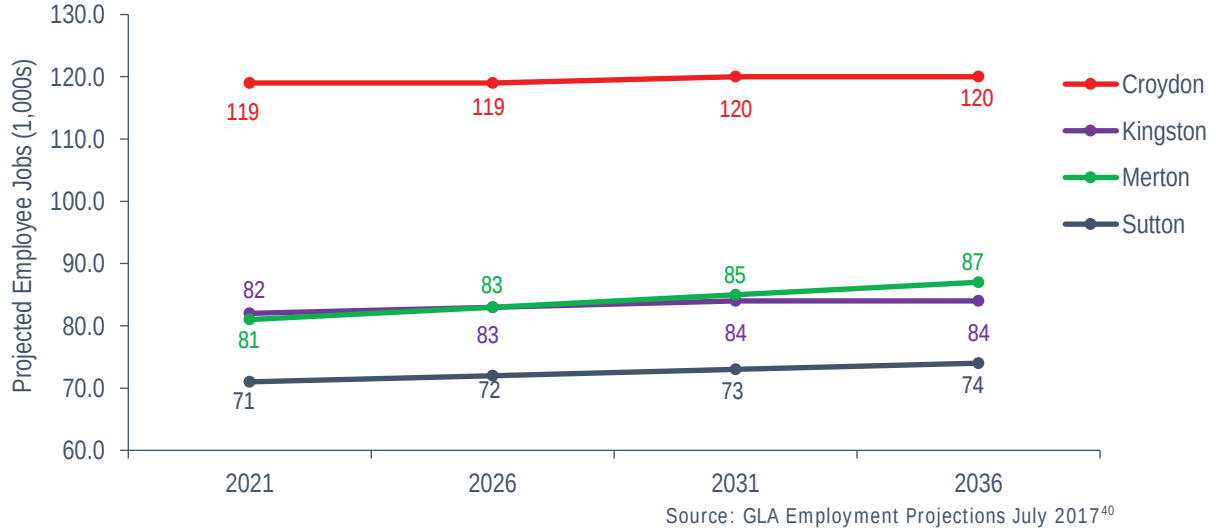
Source: NOMIS website on behalf of ONS September 2019

Figure 6.10: Job Density in LB Sutton and other South London Boroughs 2018



Employment projections

Figure 6.11: Projected growth in employee jobs for SLWP boroughs 2021 to 2036



Source: GLA Employment Projections July 2017[40]

[40] long term labour market projections are available on the GLA Datastore at https://data.london.gov.uk/dataset/long-term-labour-market-projections/resource/28282ee1-5555-4524-ab43-a5df725cac43

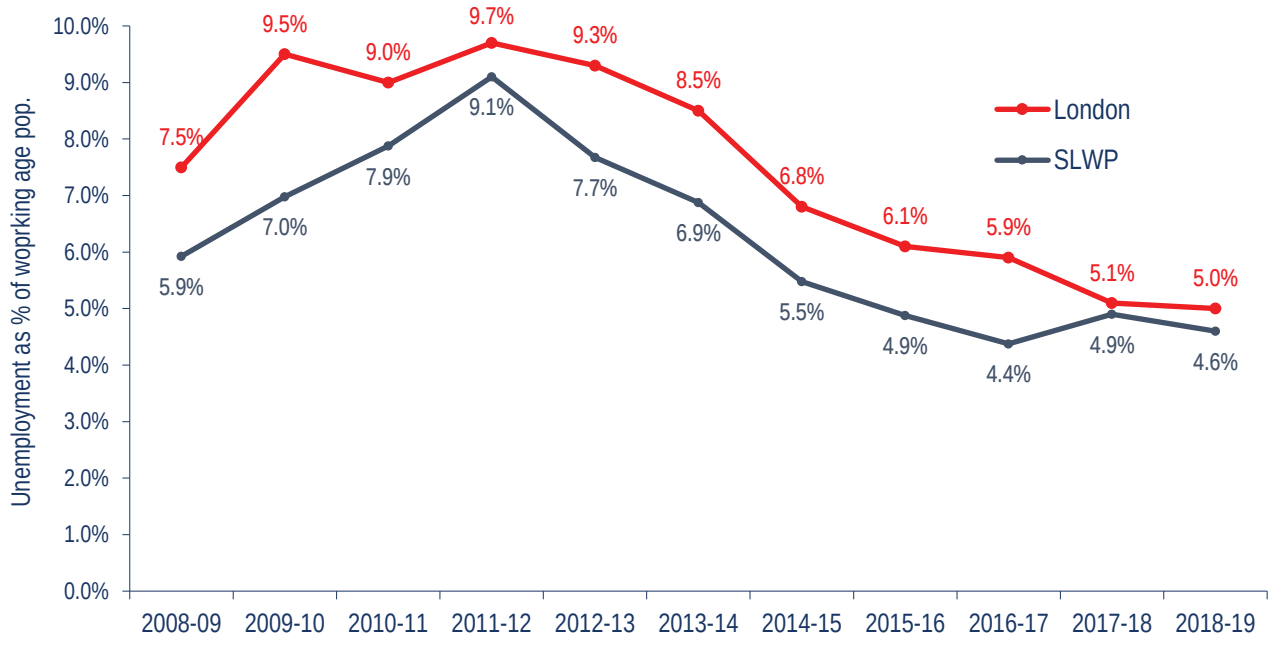
Unemployment

Table 6.19: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs, plan area and London 2018-19

	Unemployed	Residents of working age (Aged 16-64)	Unemployment rate (%)
Croydon	11,100	247,800	5.3%
Kingston	3,200	115,800	3.2%
Merton	5,100	137,000	4.3%
Sutton	4,700	130,000	4.2%
SLWP	**22,900**	**630,600**	**4.6%**
LONDON	224,300	4,893,600	5%

Source: NOMIS website on behalf of ONS, April 2020

Figure 6.12: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs 2008-09 to 2018-19



Source: ONS annual population survey/ NOMIS website September 2019

Employment sites

Table 6.20: Strategic Industrial Locations (SILs) within the SLWP boroughs

	Strategic Industrial Location (SIL)	Area (ha)
Croydon	Marlpit Lane	
	Imperial Way/Purley Way	24.69 ha
Kingston	Barwell Business Park (IBP)	
	Chessington Industrial Estate	34.9 ha
Merton	Beverley Way Industrial Area	
	Morden Road Factory Estate and Prince George's Road	
	North Wimbledon (part)	
	Willow Lane, Beddington & Hallowfield Way	41.45 ha
Sutton	Kimpton Industrial Area	18.8 ha
	Beddington Lane	105.8 ha
	Imperial Way	5.9 ha

Source: Local Plans

Occupancy of industrial land

Table 6.21: Industrial land in SLWP boroughs and in the plan area: by categorisation (ha)

	Croydon	Kingston	Merton	Sutton	SLWP
Total core & wider uses (ha)	**153.4**	**115.3**	**158.2**	**318.2**	**745.1**
Core industrial uses (ha) total	122.9	62.2	138.9	112.3	**436.3**
Industry (general & light industry)	*50.0*	*27.8*	*56.5*	*32.0*	**166.3**
Warehouses, self storage & open storage	*72.9*	*34.4*	*82.4*	*80.3*	**270**
Wider industrial uses (ha)	30.5	53.1	19.3	205.9	**308.8**
Vacant industrial land (ha)	**9.6**	**0.9**	**9.4**	**15.1**	**35.0**
Total industrial land (ha)	**163.0**	**116.2**	**167.5**	**333.3**	**780.0**
Vacancy rate (overall)	**5.9%**	**0.8%**	**5.6%**	**4.5%**	**4.5%**

London Industrial Land Demand Study (CAG Consultants, October 2017)

Table 6.22: Industrial land in SLWP boroughs and within the plan area: by designation (ha)

Designation	Use	Croydon	Kingston	Merton	Sutton	SLWP
Strategic Industrial Locations (SIL)	Industrial	82.2	38.7	105.9	120.6	347.4
	Vacant industrial land*	6.5	-	6.0	3.2	15.7
	Non-industrial	29.9	3.4	15.3	10.8	59.4
	Sub-Total	**118.6**	**42.1**	**127.2**	**134.7**	**422.6**
	Vacant Land % of SIL	5.2%	0.0%	4.5%	2.3%	3.7%
Locally Significant Industrial Sites (LSIS)	Industrial	20.3	16.1	27.6	4.2	68.2
	Vacant industrial land*	1.9	0.9	2.5	0.6	5.9
	Non-industrial	5.4	8.0	1.7	0.6	15.7
	Sub-Total	**27.7**	**25.0**	**31.8**	**5.4**	**89.9**
	Vacant Land % of LSIS	6.5%	3.4%	7.2%	10.4%	6.6%
SIL+LSIS	Industrial	102.5	54.7	133.5	124.9	415.6
	Vacant industrial land*	8.5	0.9	8.4	3.9	21.7
	Non-industrial	35.3	11.4	17.1	11.4	75.2
	Sub-Total	**146.3**	**67.0**	**159.0**	**140.2**	**512.5**
Non-designated Industrial land	Industrial	**75.2**	60.6	24.6	193.3	329.4
	Vacant industrial land*	1.1	-	0.9	11.2	13.2
Total Designated + Non-Designated (ha)	Industrial	153.4	115.3	158.2	318.2	745.1
	Vacant industrial land*	9.6	0.9	9.4	15.1	35.0
	Non-industrial	35.3	11.4	17.1	11.4	75.2
	GRAND TOTAL	**198.3**	**127.6**	**184.6**	**344.7**	**855.2**
	Vacant Land (%)	**4.8%**	**0.7%**	**5.1%**	**4.4%**	**4.1%**

London Industrial Land Demand Study (CAG Consultants, October 2017)

Table 6.23: Industrial land in SLWP area: core, wider and non-industrial activities for SLWP boroughs and within the plan area 2016-41

	Use	Croydon	Kingston	Merton	Sutton	SLWP
Core industrial uses (ha)	Light industry	-	15.9	7.4	7.8	**38.9**
	General industry	42.2	11.9	49.1	24.1	**127.3**
	Warehouses	63.9	33.6	72.2	76	**245.7**
	Self storage	4.4	0.8	3.5	4.3	**13**
	Open storage	4.6	0	6.7	0	**11.3**
	Core Sub-Total	**122.9**	**62.2**	**138.9**	**112.3**	**436.3**
Wider industrial uses (ha)	Whole-sale markets	1.2	0.5	0	0	**1.7**
	Waste management	5	34.2	9.4	6.6	**55.2**
	Utilities	18.6	16.4	7.5	193.9	**236.4**
	Land for rail	5.6	1.8	0	4	**11.4**
	Land for buses	0.1	0	2.4	1.3	**3.8**
	Docks	0	0.1	0	0	**0.1**
	Other industrial	0	0	0	0	**0**
	Wider Sub-Total	**30.5**	**53.1**	**19.3**	**205.9**	**308.8**
Vacant land	Vacant industrial land*	7.4	0.2	4.2	12.6	**24.4**
	Land with vacant buildings	2.2	0.7	5.2	2.5	**10.6**
Non-industrial uses	Office	7.4	6.5	2.8	1.3	**18**
	Retail	15.2	2.7	12	7.1	**37**
	Residential	8.1	0.6	0.6	0.4	**9.7**
	Recreation & leisure	0	0.3	0.5	0.6	**1.4**
	Community services	0.8	0.5	1.3	0	**2.6**
	Mixed-use	1.4	0	0	0	**1.4**
	Other non-industrial	2.4	0.7	0	2	**5.1**
	Non-industrial Sub-Total	**35.3**	**11.4**	**17.1**	**11.4**	**75.2**
Total: Core + Wider (ha)		153.4	115.3	158.2	318.2	**745.1**
Total: Core + Wider (ha) + Vacant		163	116.2	167.5	333.3	**780**
GRAND TOTAL		**198.3**	**127.6**	**184.6**	**344.7**	**855.2**

London Industrial Land Demand Study (CAG Consultants, October 2017)

Projected change in industrial floorspace

Table 6.24 Projected change in industrial floorspace for SLWP boroughs 2016-41

	Employment Projection Method	Trend Based
Croydon	-61,700	-123,600
Kingston	-41,300	27,200
Merton	-21,700	-116,300
Sutton	-31,100	98,700
SLWP	**-155,800**	**-114,000**
LONDON	-1,151,400	-1,048,100

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

Projected land demand for industrial and warehousing uses

Table 6.25: Forecast land demand for General & Light Industry for SLWP boroughs 2016-41 (ha)

	Employment-Based	Trend-Based	Average
Croydon	-9.5	-19.0	-14.3
Kingston	-6.4	4.2	-1.1
Merton	-3.3	-17.9	-10.6
Sutton	-4.8	15.2	5.2
SLWP	**-24**	**-17.5**	**-20.8**
LONDON	-173.3	-159.7	-166.5

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

Table 6.26: Projected change in demand for warehouse floorspace and land for SLWP boroughs 2016-41

	Floorspace	Land (ha)
Croydon	-27,300	-4.2
Kingston	-56,200	-8.6
Merton	41,000	6.3
Sutton	110,800	17.0
SLWP	**68,300**	**11.0**
LONDON	1,608,400	279.6

Source: Employment Projection Method Trend-Based (CAG Consultants 2017)

Projected land demand for apportioned waste as of 2016 (based upon the previous London Plan)[41]

Table 6.27: Indicative net land requirement for apportioned waste for SLWP boroughs to 2036

	Previous London Plan 2016 apportionment of HH and C&I waste to 2036 (tpa)	Land requirement (ha)	Indicative land take of planned capacity (ha)	Net Indicative Land Requirement (ha)
Croydon	247,000	4.2	0.2	4.0
Kingston	148,000	2.5	0.0	2.5
Merton	239,000	4.1	2.5	1.5
Sutton	198,000	3.4	4.8	-1.4
SLWP	**832,000**	**14.2**	**7.5**	**6.6**
LONDON	8,325,000	137.9	171.8	-33.9

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

Release of industrial land to other uses

Table 6.28: Industrial pipeline planned release to other uses for SLWP boroughs as of 2016 (ha)

	Development pipeline (LDD)	Local Plan/ Opportunity Areas/ Site Allocations	Total
Croydon	1.3	0	1.3
Kingston	0.6	0	0.6
Merton	0.7	0.1	0.8
Sutton	10.2	7.5[42]	17.7
SLWP	12.8	7.6	20.4

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

[41] as discussed in Section 3 of this report, the new London Plan 2019-41 has introduced revised borough apportionment targets for household and C&I waste streams, so the data in this table will be superseded

[42] as of September 2019, this land (at the former Felnex industrial estate and the former Wandle Valley Trading Estate in Hackbridge) is now under construction for residential uses

Table 6.29: Projected industrial land release by borough 2016-41

	Industrial	Warehousing	Waste	Other	Demand	Surplus from excess vacant land	Net release
Croydon	-14.3	-4.2	4.0	8.0	-6.5	-3.5	-9.9
Kingston	-1.1	-8.6	2.5	-	-7.2	0.0	-7.2
Merton	-10.6	6.3	1.5	-	-2.8	-2.2	-5.0
Sutton	5.2	17.0	-1.4	1.7	22.5	-8.0[43]	14.5
SLWP	**-20.8**	**10.5**	**6.6**	**9.7**	**6**	**-13.7**	**-7.6**

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

Table 6.30: Comparison of London Plan 2016 Benchmark Demand and Pipeline Release of industrial land to other uses

	Benchmark release (London Plan 2016)	Planned release	Planned – benchmark comparison
Croydon	-9.9	-1.3	8.6
Kingston	-7.2	-0.6	6.7
Merton	-5.0	-0.8	4.2
Sutton	14.5	-17.7	-32.2
SLWP	-7.6	-20.4	-12.7

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

Borough classifications for the management of industrial floorspace capacity

Table 6.31: Management of industrial floorspace capacity – borough classifications (see also Table 6.2 of new London Plan) 2016-41[44]

	Vacancy Rate (%)	Rents	Baseline net release (ha)	Categorisation in new London Plan	Notes
Croydon	5.9%	£10.25	-9.9	**Retain**	These boroughs should seek to intensify industrial floorspace capacity following the principle of no net loss across SILs and locally significant industrial areas
Kingston	0.8%	£12.00	-7.2	**Retain**	
Merton	5.6%	£10.50	-5.0	**Retain**	
Sutton	4.5%	£11.75	14.5	**Provide Capacity** (i.e. demand for industrial, logistics and related uses is anticipated to be the strongest)	LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations accessible to strategic road networks and in other sustainable locations. Sutton's new Local Plan (February 2018) has identified 10 additional hectares of land for industrial uses to 2031.

Source: Draft new London Plan 2017 and London Industrial Land Supply and Economy Study (CAG Consultants ,2016)

[43] Sutton's surplus excess vacant land is thought to be accounted for by the former Felnex industrial estate and the Wandle Valley Trading Estate, so there may be an element of double-counting between Tables 6.28 and 6.29

[44] in the Wandle Valley property market area there is an overall positive net demand, and this is strongest in Sutton and Wandsworth

Town Centre Network

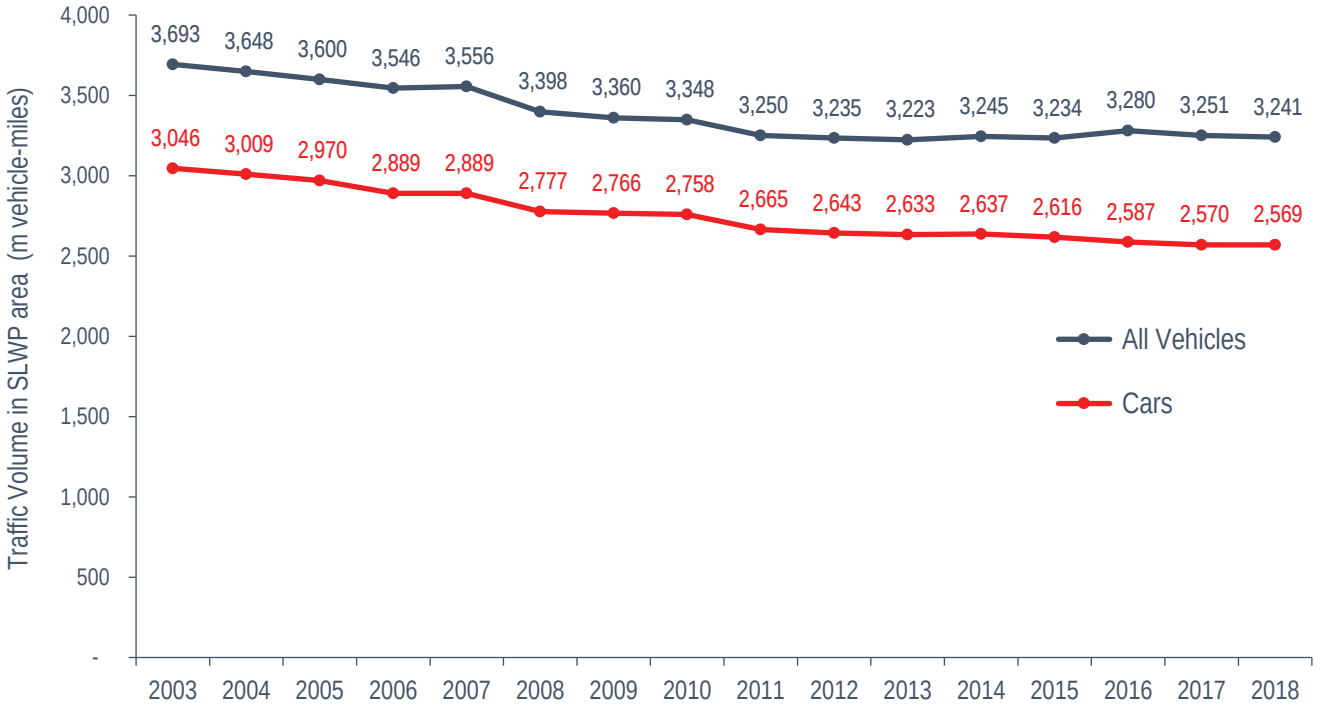
Table 6.32: Town centre network in SLWP area: retail floorspace and outlets

Borough	Centre	Classification (LP2016)	Retail Floorspace			Retail Outlets		
			Comparison (sq.m)	Convenience (sq.m)	Service (sq.m)	Comparison	Convenience	Service
Croydon	Croydon	Metropolitan	157,155	13,850	9,800	239	59	87
	Addiscombe	District	3,200	2,660	2,080	25	13	23
	Coulsdon	District	4,030	1,790	3,130	32	10	28
	New Addington	District	2,350	2,500	930	11	10	9
	Norbury	District	3,080	4,870	3,440	24	25	32
	Purley	District	4,150	8,680	4,500	25	7	39
	Selsdon	District	1,400	6,240	1,120	13	6	16
	South Norwood	District	2,620	3,230	3,150	21	21	35
	Thornton Heath	District	5,030	11,170	2,790	31	28	37
	Upper Norwood/ Crystal Palace	District	6,650	5,330	2,400	49	17	24
Kingston	Kingston	Metropolitan	134,080	9,890	5,180	244	32	52
	New Malden	District	9,851	6,230	3,270	36	17	29
	Surbiton	District	8,256	7,320	4,330	45	14	36
	Tolworth	District	4,170	4,180	1,980	33	13	22
Merton	Wimbledon	Major	37,508	11,380	4,370	101	25	35
	Mitcham	District	4,967	7,940	2,440	28	23	26
	Morden	District	3,340	7,520	2,660	23	26	24
	Colliers Wood	PotentialDistrict	22,900	10,710	540	17	1	2
Sutton	Sutton	Metropolitan	70,593	20,140	5,490	121	24	50
	Carshalton Village	District	2,720	1,560	1,410	15	6	13
	Cheam Village	District	4,410	1,530	2,510	34	7	21
	North Cheam	District	3,150	9,980	1,330	24	7	18
	Rosehill	District	**2,764**	**3,264**	**1,701**	**15**	**15**	**19**
	Wallington	District	6,000	7,060	2,290	38	12	25
	Worcester Park	District	6,800	4,690	4,260	39	11	31
	Hackbridge	PotentialDistrict	547	1,223	477	1	1	1

ENVIRONMENT

Traffic growth and congestion

Figure 6.13: Traffic Volumes (million vehicle-km) in SLWP area 2003 to 2018



Source: Department for Transport (DfT) 2019

Table 6.33: Overall volume of vehicular traffic for SLWP boroughs and plan area 2008-2018

	Volume of vehicular traffic (million vehicle-km)		Change in volume of vehicular traffic from 2008 to 2018	
	2008	2018	million vehicle-km	% change
Croydon	1,212	1,156	-56	-4.6%
Kingston	925	887	-38	-4.1%
Merton	621	585	-36	-5.8%
Sutton	640	613	-27	-4.2%
SLWP	3,398	3,241	-157	-4.6%
London	30,273	29,539	-734	-2.4%

Table 6.34: Overall volume of car traffic for SLWP boroughs and plan area 2008-2018

	Volume of car traffic (million vehicle-km)		Change in volume of car traffic 2008-18	
	2008	2018	million vehicle-km	% change
Croydon	989	917	-72	-7.3%
Kingston	766	713	-53	-6.9%
Merton	497	452	-45	-9.1%
Sutton	525	487	-38	-7.2%
SLWP	2,777	2,569	-208	-7.5%
London	23,878	22,573	-1305	-5.5%

Source: Department for Transport (DfT) 2019

Modal share

Table 6.35: Trips per day by borough of origin, and modal shares (average day) 2016/17 to 2018/19 for SLWP boroughs and plan area

	Croydon	Kingston	Merton	Sutton	SLWP	London
Total trips per day (000s)	832	387	435	452	**2,096**	18,047
Rail	10%	10%	9%	8%	**9%**	6%
Underground	1%	1%	8%	3%	**3.2%**	10%
Bus/tram	16%	12%	12%	10%	**12.4%**	14%
Taxi/other	1%	1%	1%	1%	**0.9%**	2%
Car/MC	48%	42%	42%	51%	**45.8%**	35%
Cycle	1%	3%	1%	1%	**1.4%**	3%
Walk	24%	32%	28%	26%	**27.3%**	32%

Source: Borough Local Implementation Plan (LIP) performance indicators, TfL

Road casualties

Table 6.36: Road casualties, people killed or seriously injured in road traffic collisions 2014-18*

	Croydon	Kingston	Merton	Sutton	SLWP	London
2005-09 average	252	103	117	124	596	6,402
2014	135	67	83	51	336	3,969
2015	121	49	68	40	278	3,775
2016	122	52	69	45	288	3,759
2017	126	50	60	61	297	3,883
2018	112	55	78	70	315	4,079
2017 to 2018	-13%	+10%	+30%	+15%	+6%	+5%
2018 compared to 2005-09 baseline	-56%	-47%	-33%	-44%	-47%	-36%

Source: DfT Reported KSI (adjusted) Road Casualties GB Annual Report 2018

**Note on changes to the reporting of road traffic casualties:*
The Metropolitan Police introduced a new collision reporting system in November 2016 which uses an 'injury-based assessment' in line with DfT guidance together with online self-reporting. While both of these changes are expected to provide a better assessment of injury occurrence and severity, this has made data collected from November 2016 onwards difficult to compare with earlier data.
TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017, and are used in this table

Road Network

Table 6.37: Road classifications in SLWP area

	'A' Roads including Strategic Red Routes (TfL road network) (km)	Minor Roads including other 'A' Roads, 'B' Roads, 'C' Roads and unclassified local access roads (km)	Total Road Length (km)
Croydon	78.1 km	698.3 km	776.4 km
Kingston	44.7 km	299.4 km	344.1 km
Merton	42.4 km	336.9 km	379.3 km
Sutton	29.6 km	402.3 km	431.9 km
SLWP	194.8 km	1736.9 km	1931.7 km

Highway asset condition

Table 6.38: Highway asset condition – percentage of the principal road network length in poor condition and requires requires maintenance[35] for SLWP boroughs and plan area 2012-16

	2014-15	2015-16	2016-17
Croydon	33.4%	36.3%	13.2%
Kingston	19.0%	17.8%	18.2%
Merton	15.4%	15.9%	8.8%
Sutton	14.7%	16.2%	11.9%
SLWP	20.6%	21.6%	13.0%
London	16.0%	15.3%	12.6%

Source: Borough Local Implementation Plan (LIP) performance indicators (TfL, Report 10)

Air Quality[36]

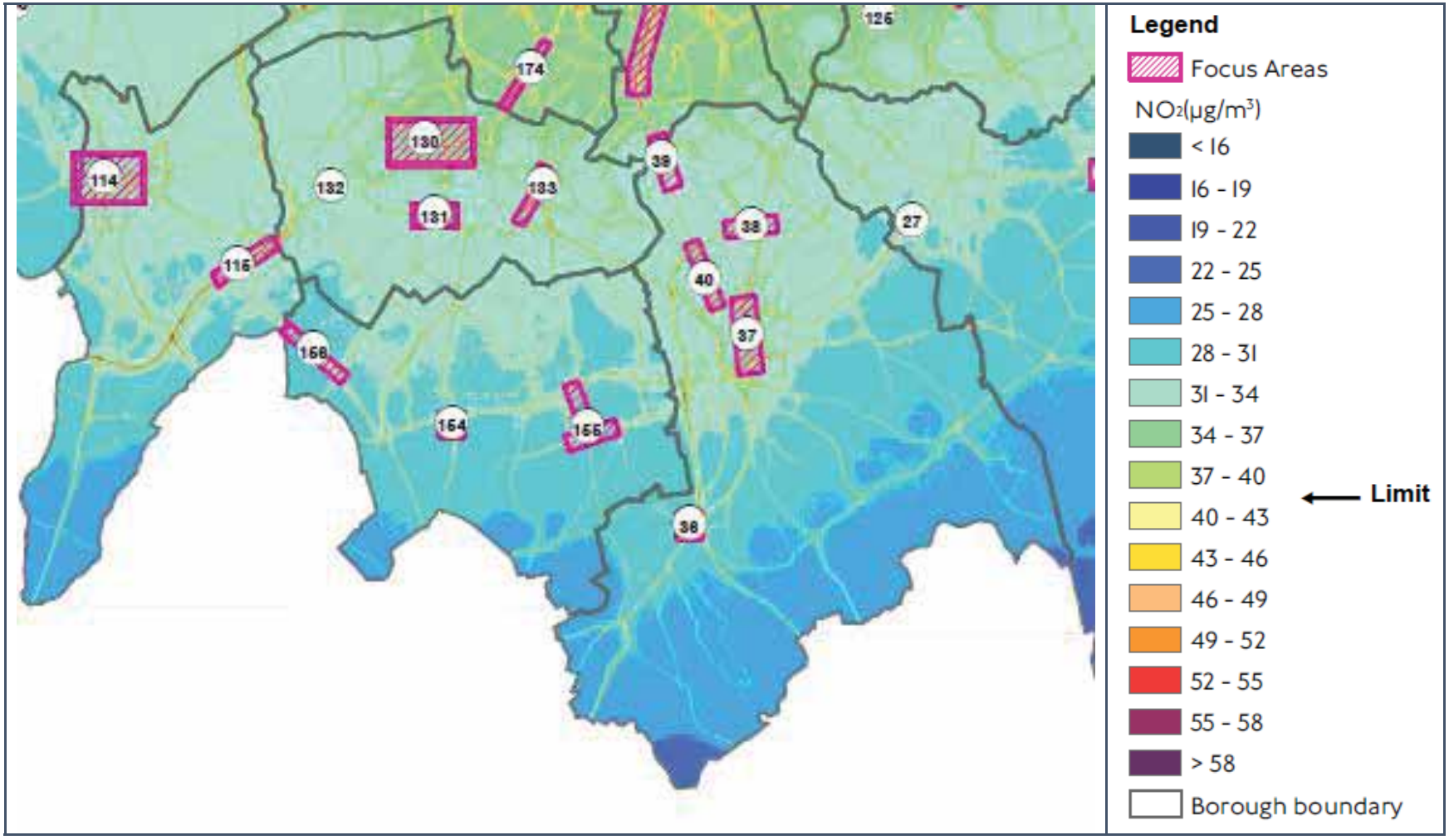
Table 6.39: Air Quality Focus Areas within the SLWP area

	Air Quality Focus Area
Croydon	Purley Cross and Russell Hill
	Wellesley Road
	Thornton Heath Brigstock Rd/High St/Whitehorse Lane
	Norbury London Road
	London Road between Thornton Heath Pond and St James Road
Kingston	Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road
	A3 Kingston Bypass at Malden Junction
Merton	Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road
	Morden Road/London Road/Morden Hall Road/Martin Way
	Raynes Park junctions Kingston Road/Bushey Road
	Mitcham London Road A216 from Cricket Green to Streatham Road Junction
Sutton	Sutton A232 Cheam/Carshalton Rd/High St/Brighton Rd
	Wallington Manor Rd/Stanley Park Rd/Stafford Rd
	Central Road/ Cheam Common Road

[35] based on Detailed Visual Inspection survey data

[36] Air Quality Focus Areas are locations that not only exceed the EU annual mean limit value for NO2 but are also locations with high human exposure. They were defined to address concerns raised by boroughs within the LAQM review process and forecasted air pollution trends

Figure: 6.14: Air Quality Focus Areas within the SLWP area



Source: London Atmospheric Emissions Inventory 2016

Table 6.40: Air quality monitoring results for Croydon in 2018[37]

National air quality objective	Norbury		Norbury Manor		Park Lane		Purley Way (A23)	
	2018	Met?	2018	Met?	2018	Met?	2018	Met?
NITROGEN DIOXIDE (NO_2)								
200 ug/m3 as a 1 hour mean, not to be exceeded more than 18 times a year	0	YES	-	-	0	YES	0	YES
40 ug/m3 as an annual mean	49	NO	-	-	41	NO	31	YES
PARTICULATE (PM10)								
40 ug/m3 as an annual mean	-	-	-	-	21	YES	-	-
50 ug/m3 as a 24 hour mean, not to be exceeded more than 35 times a year	-	-	-	-	1	YES	-	-
PARTICULATE (PM2.5)								
25 ug/m3 as an annual mean	-	-	12	YES	-	-	-	-

Source: London Air Quality Network (September 2019)

Table 6.41: Air quality monitoring results for Kingston in 2018

National air quality objective	Cromwell Road		Kingston Vale		Tolworth Broadway	
	2018	Met?	2018	Met?	2018	Met?
NITROGEN DIOXIDE (NO_2)						
200 ug/m3 as a 1 hour mean, not to be exceeded more than 18 times a year	1	YES	0	YES	0	YES
40 ug/m3 as an annual mean	55	NO	36	YES	44	NO
PARTICULATE (PM10)						
40 ug/m3 as an annual mean	30	YES	22	YES	23	YES
50 ug/m3 as a 24 hour mean, not to be exceeded more than 35 times a year	15	YES	2	YES	2	YES
PARTICULATE (PM2.5)						
25 ug/m3 as an annual mean	-	-	-	-	-	-

Source: London Air Quality Network (September 2019)

[37] calendar year from 1 January 2018 to 31 December 2018

Table 6.42: Air quality monitoring results for Merton in 2018

National air quality objective	Merton Road		Morden Civic Centre (2)	
	2018	Met?	2018	Met?
NITROGEN DIOXIDE (NO_2)				
200 ug/m3 as a 1 hour mean, not to be exceeded more than 18 times a year	-	-	0	YES
40 ug/m3 as an annual mean	-	-	48	NO
PARTICULATE (PM10)				
40 ug/m3 as an annual mean	32	YES	-	-
50 ug/m3 as a 24 hour mean, not to be exceeded more than 35 times a year	13	YES	-	-
PARTICULATE (PM2.5)				
25 ug/m3 as an annual mean				

Source: London Air Quality Network (September 2019)

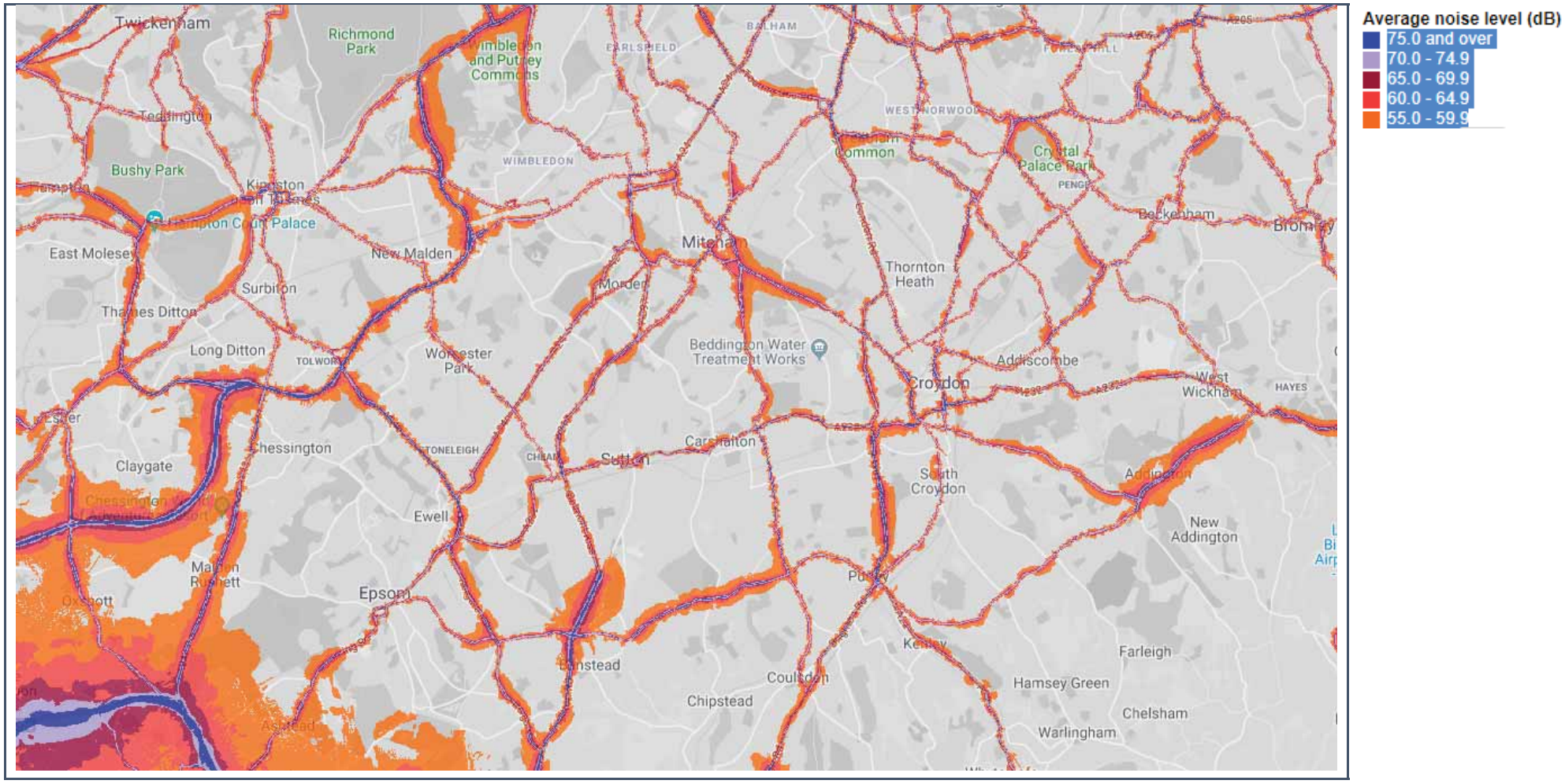
Table 6.43: Air quality monitoring results for Sutton in 2018

National air quality objective	Beddington Lane		Beddington Lane North		Wallington		Worcester Park	
	2018	Met?	2018	Met?	2018	Met?	2018	Met?
NITROGEN DIOXIDE (NO_2)								
200 ug/m3 as a 1 hour mean, not to be exceeded more than 18 times a year	0	YES	0	YES	0	YES	7	YES
40 ug/m3 as an annual mean	25	YES	29	YES	47	NO	52	NO
PARTICULATE (PM10)								
40 ug/m3 as an annual mean	22	YES	22	YES	23	YES	20	YES
50 ug/m3 as a 24 hour mean, not to be exceeded more than 35 times a year	7	YES	2	YES	4	YES	2	YES
PARTICULATE (PM2.5)								
25 ug/m3 as an annual mean	-	-	12	YES	-	-	-	-

Source: London Air Quality Network (September 2019)

Noise exposure

Figure 6.15: Road traffic noise exposure in the SLWP area (Lden)[38]



Source: DEFRA Strategic Noise Mapping 2017

[38] Lden (day-evening-night) = a 24 hour annual average noise level in decibels with weightings applied for evening and night periods

Carbon Dioxide (CO_2) Emissions

Figure 6.16: CO_2 emissions within the SLWP area - TOTAL

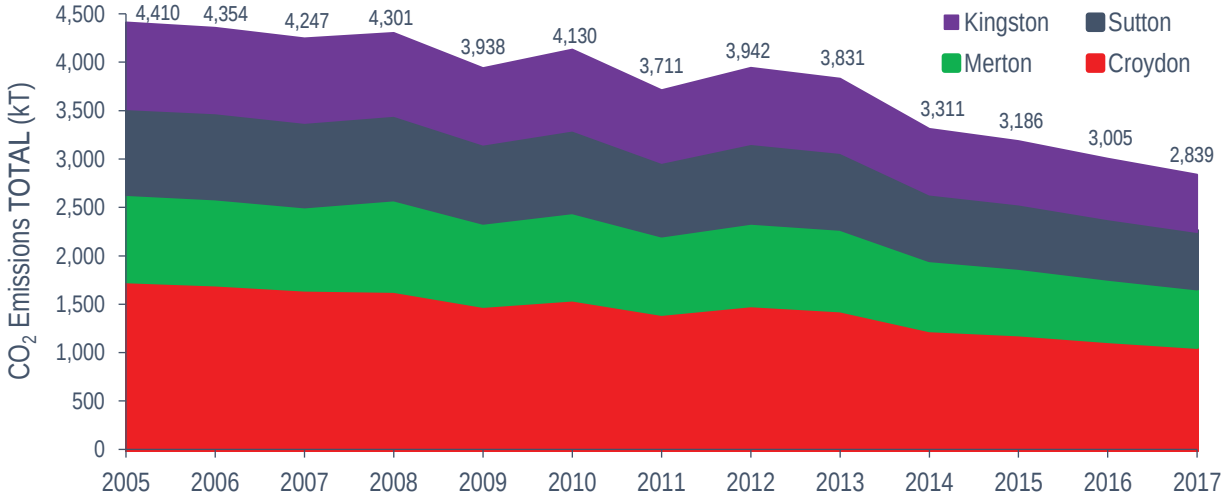


Figure 6.17: CO_2 emissions within the SLWP area - TRANSPORT

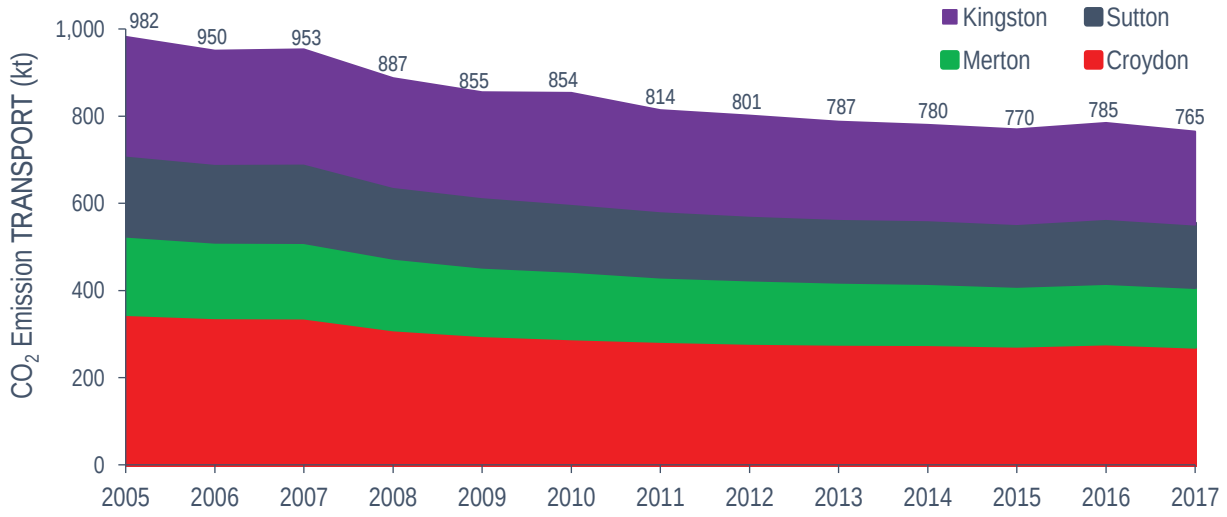
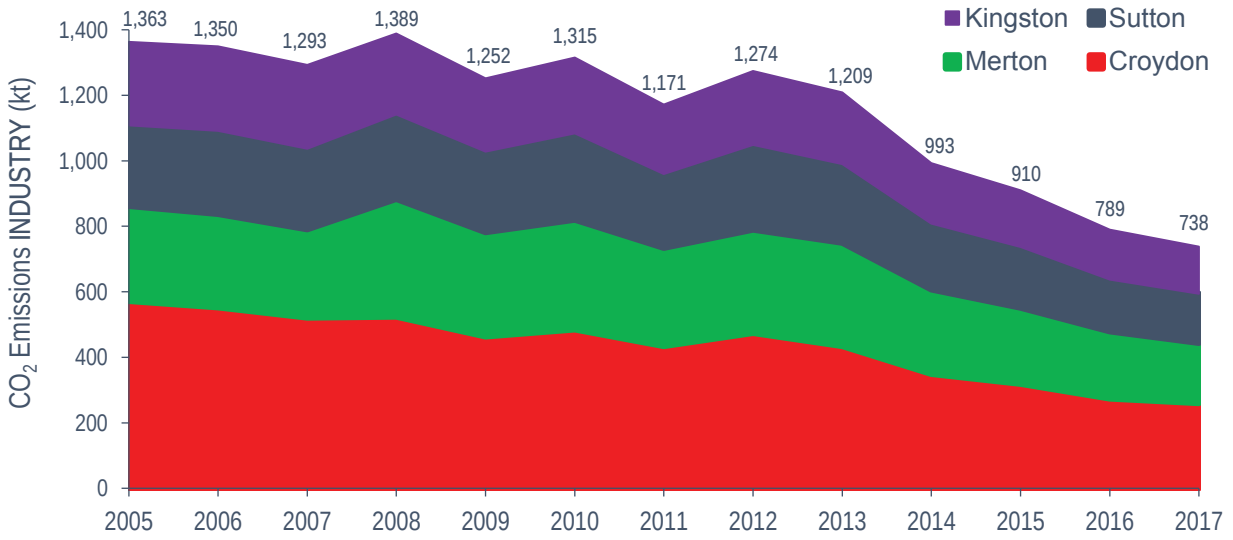
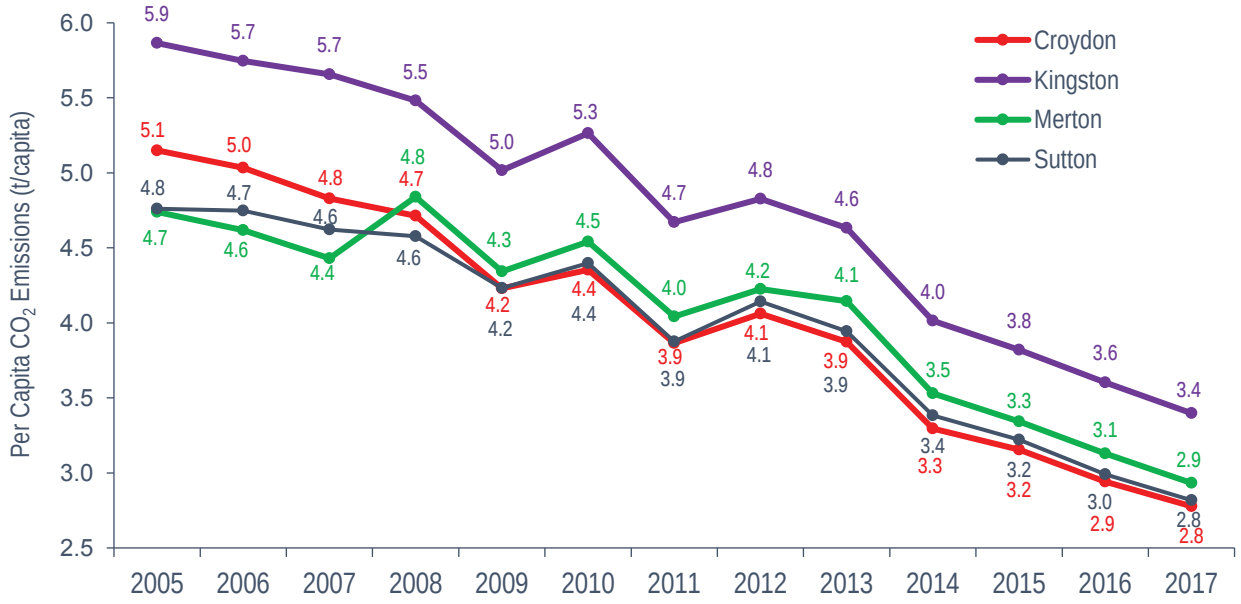


Figure 6.18: CO_2 emissions within the SLWP area - INDUSTRY AND COMMERCE



Source: UK local authority carbon dioxide emissions national statistics for 2005-16 (BEIS, June 2019)

Figure 6.19: Per capita CO_2 emissions within for SLWP boroughs 2005-2017 - total



Climate Change

Table 6.44: UK climate trends

4th Annual State of the UK Climate Report (July 2018) [39]
• 2017 was the 5th warmest year in records dating back to 1910. • Average UK temperatures over the last decade (2008-2017) were 0.8°C warmer than the 1961-1990 average. • In contrast to summer 2018, UK summers have been notably wetter over the last decade (2008-2017), with a 20% increase in rainfall compared to 1961-1990. • Nine of the ten warmest years in the UK have occurred since 2002, and all of the top ten since 1990. • The Central England Temperature series, which extends back to 1659, shows that the 21st century has so far been warmer than the previous three centuries.; • Although 2017 was not perceived to be a particularly warm year, it was still more than 1ºC warmer than the 1961-1990 baseline and ranks fifth warmest year overall for the UK. • Mean sea level around the UK has risen at a rate of approximately 1.4 mm per year since the start of the 20th Century. equivalent to a rise of about 16 cm.

Source: 4th Annual State of the UK Climate Report (Met Office, July 2018)

Table 6.45: Future Climate Projections

Change in Climate	UKCP09 Emissions[40] Scenarios in the 2050s		
	Low Emissions	Medium	High Emissions
TEMPERATURE			
Increase in **winter mean temperature**	+2ºC	+2.2ºC	+2.5ºC
Increase in **summer mean temperature**	+2.5ºC	+2.7ºC	+3.1ºC
Increase in **summer mean daily maximum temp.**	+3.5ºC	+3.7ºC	+4.3ºC
Increase in **summer mean daily min temp.**	+2.7ºC	2.9ºC	+3.3ºC
RAINFALL			
Change in **annual mean precipitation**	0%	0%	0%
Change in **winter mean precipitation**	+12%	+14%	+16%
Change in **summer mean precipitation**	- 14%	- 19%	-19%

Source: UK Climate Impacts Programme Projections (UKCP09)

[39] the Met Office's Annual State of the UK Climate Report provides an up-to-date assessment of UK climate trends, variations and extremes based on the latest available climate quality observational datasets – see https://www.metoffice.gov.uk/research/climate/maps-and-data/about/state-of-climate

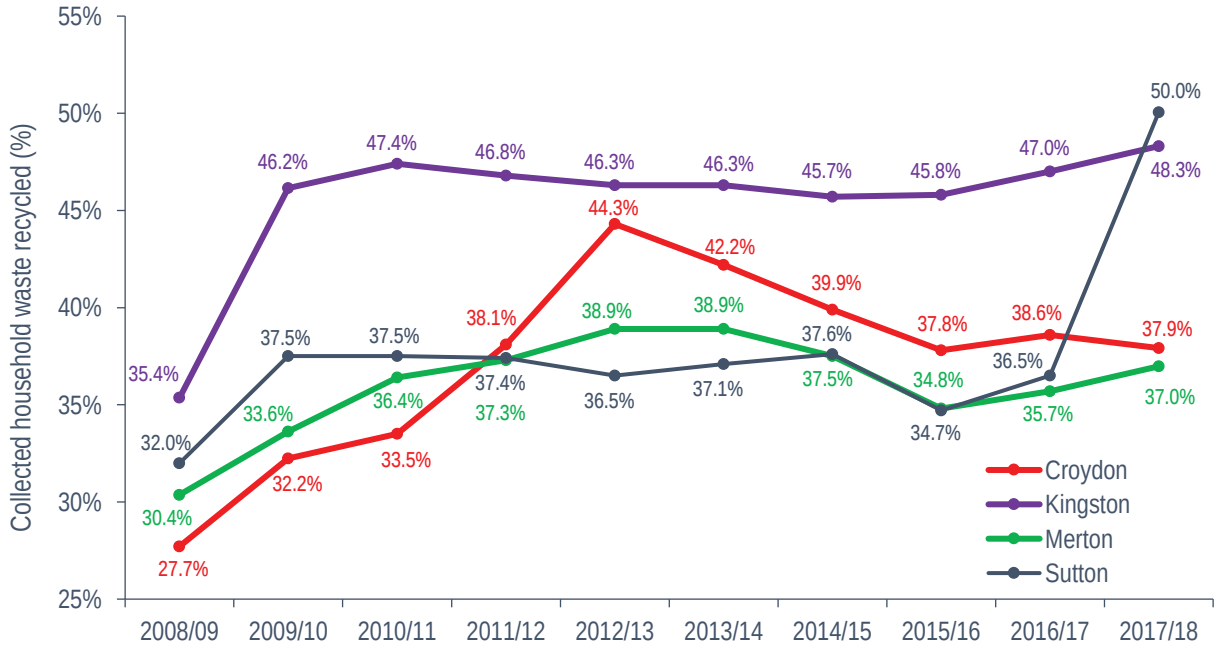
[40] the relevant UKCP18 projections are not yet available at the local level so the corresponding UKCP09 projections are quoted here

UK Climate Projections 2018 (UKCP18)
According to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPPC, 2014), atmospheric carbon dioxide (CO_2) levels in 2011 reached their highest point for almost 1 million years, rising to a new level of over 391 parts per million (ppm) compared to around 280 ppm prior to the industrial revolution. In the northern hemisphere, 1983 -2012 was the warmest 30-year period of the last 1400 years and 13 of the 15 hottest years on record globally have all occurred since 2000. By April 2018 average CO_2 levels had risen to a new high of 410 ppm. According to a Special Report[41] produced by the IPPC in November 2018, this has contributed to around a 1.0ºC increase in average global temperatures since pre-industrial times. The IPPC Special Report concluded that international efforts should be stepped up to limit warming to 1.5ºC rather than the aspirational 2 ºC target set by the Paris Agreement in order to avoid catastrophic impacts on human health, ecosystems, critical infrastructure, water supply and economic growth. However, this can only be achieved if global CO_2 emissions start to fall well before 2030 through rapid and far-reaching transitions in energy supply, land-use, industry and transport. The latest UK Climate Projections 2018 (UKCP18)[42], published by the Met Office in November 2018, show that: • by 2070, in the high emission scenario[43], average warming across the UK is projected to range from 0.9 °C to 5.4 °C in summer, and from 0.7 °C to 4.2 °C in winter. • hot summers are expected to become more common. In the recent past (1981-2000) the chance of seeing a summer as hot as 2018 was low (<10%). The chance has already increased due to climate change and is now between 10-20%.With future warming, hot summers by mid-century will be even more common (~50%). • human-induced climate change has made the 2018 record-breaking UK summer temperatures about 30 times more likely than it would be naturally. • by 2070, in the high emission scenario, average changes in rainfall patterns across the UK are projected to range from -47% to +2% in summer, and between -1% to +35% in winter. • by the end of the century, sea levels are projected to rise between 0.53m & 1.15m (high emission scenario).

UK Climate Projections 2018 (UKCP18)[44], published by the Met Office in November 2018

Household waste recycling rate

Figure 6.20: Household waste recycling rate for SLWP boroughs 2008-09 to 2017-18



[41] the IPPC Special Report is available at https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_High_Res.pdf
[42] UKCP18 headline findings at https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf
[43] UKCP18 projections provide local low, central and high changes across the UK, corresponding to 10%, 50% and 90% probability levels. Local values are averaged over the UK to give a range of average precipitation change between the 10%- 90% probability levels
[44] UKCP18 headline findings at https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf

Flood Risk

CROYDON

Figure 6.21: Fluvial flood risk in Croydon - Environment Agency Flood Zones

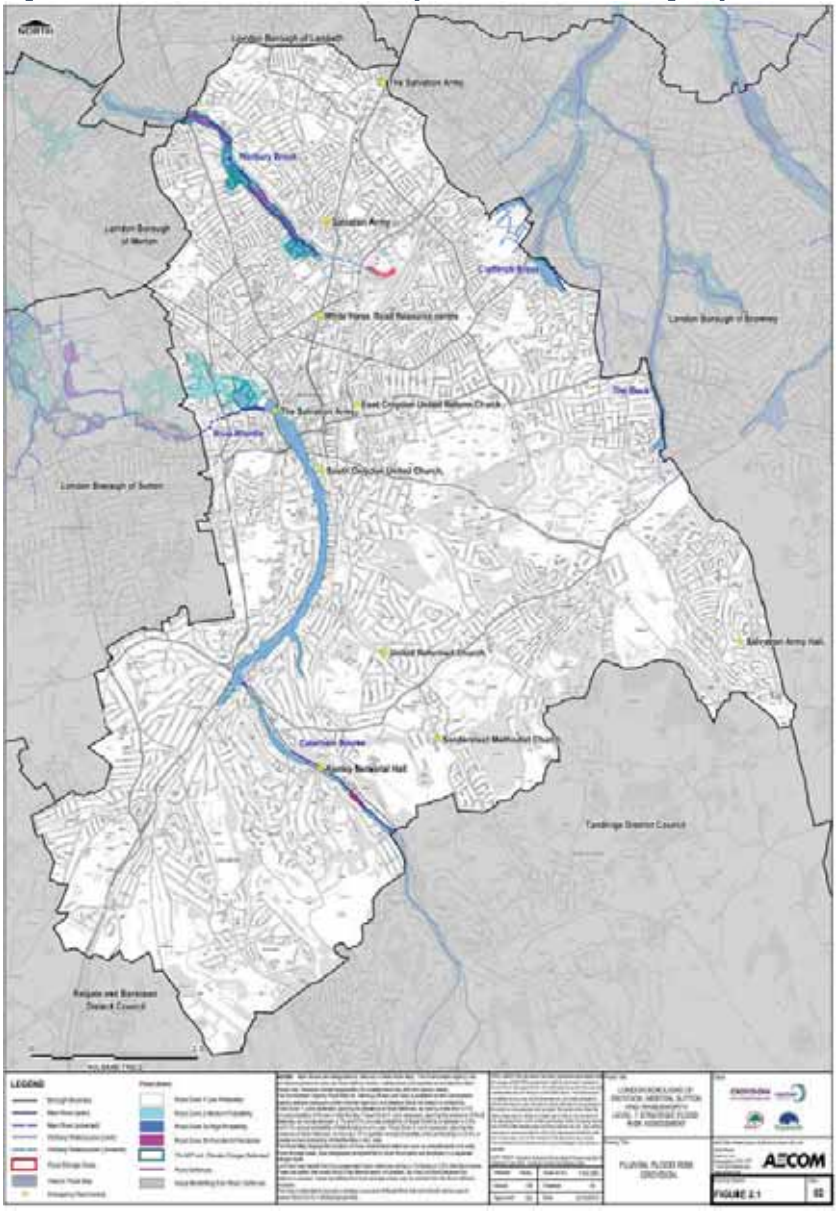
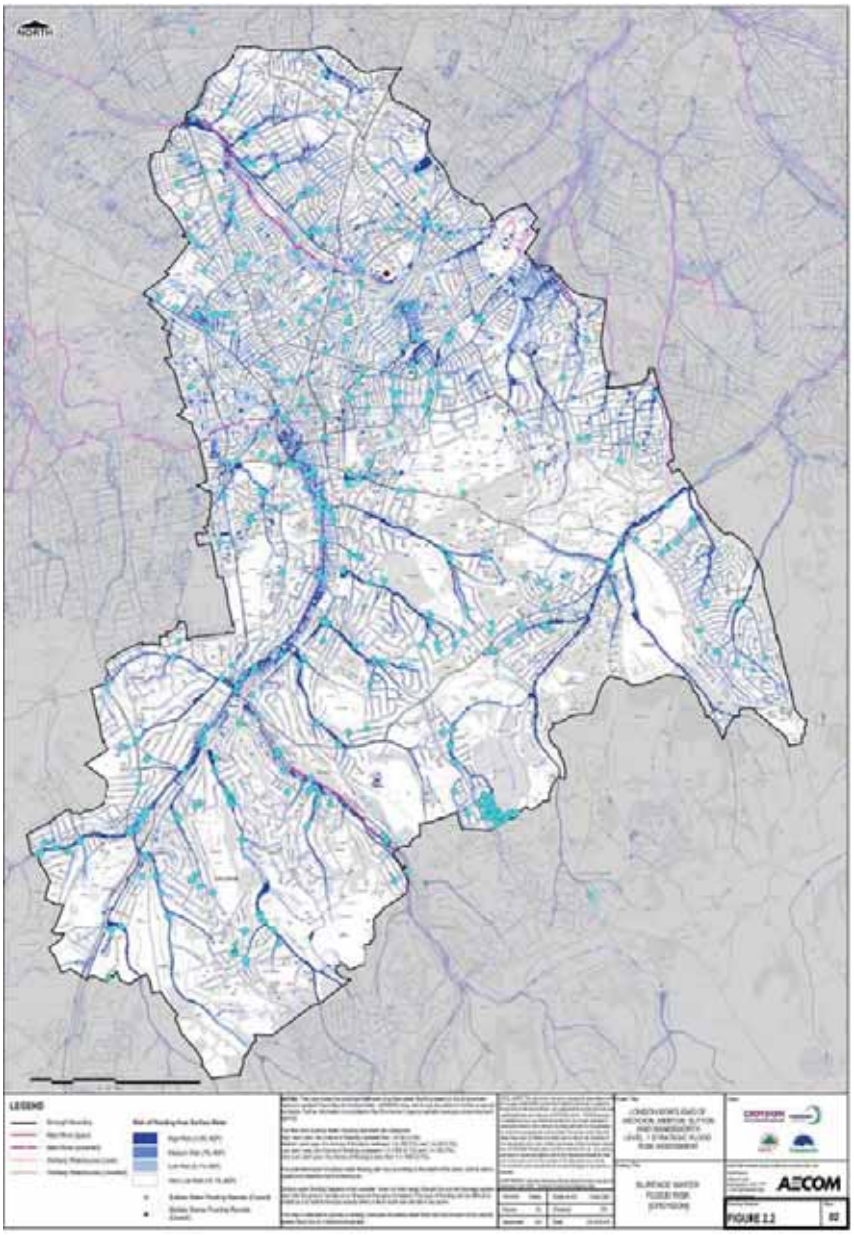


Table 6.46: Fluvial flood risk in Croydon – Properties located within EA Flood Zones

EA Flood Zone	Flood Risk	% of Borough	Dwellings	Non-Residential	Unclassified
Flood Zone 1 Lov Risk	Less than 1 in a 1000 annual probability (<0.1%)	97.8%	144,140	6,149	8,649
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%)	1.7%	1,030	113	107
Flood Zone 3a High Risk	More than 1 in a 100 annual probability (>1%)	<0.5%	3,913	380	326
Flood Zone 3b Functional Floodplain	More than 1 in 20 annual probability (>5% 'defended').	<0.5%	235	48	15

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.22: Surface water flood risk in Croydon based on the Government's Risk of Flooding from Surface Water (RoFSW) map



Source: SFRA Level 1 Report (AECOM, December 2015)

Table 6.47 Surface Water Flooding in Croydon: Dwellings at Risk in the 1 in 100 year event

RoFSW [45]Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability (<1%)	32,090	1,434	1,722
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	10,094	871	638
High	More than 1 in a 30 annual probability (>3.3%)	5,856	737	513

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

[45] based on the Government's Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMfSW)

KINGSTON

Figure 6.23: Fluvial flood risk in Kingston - Environment Agency Flood Zones

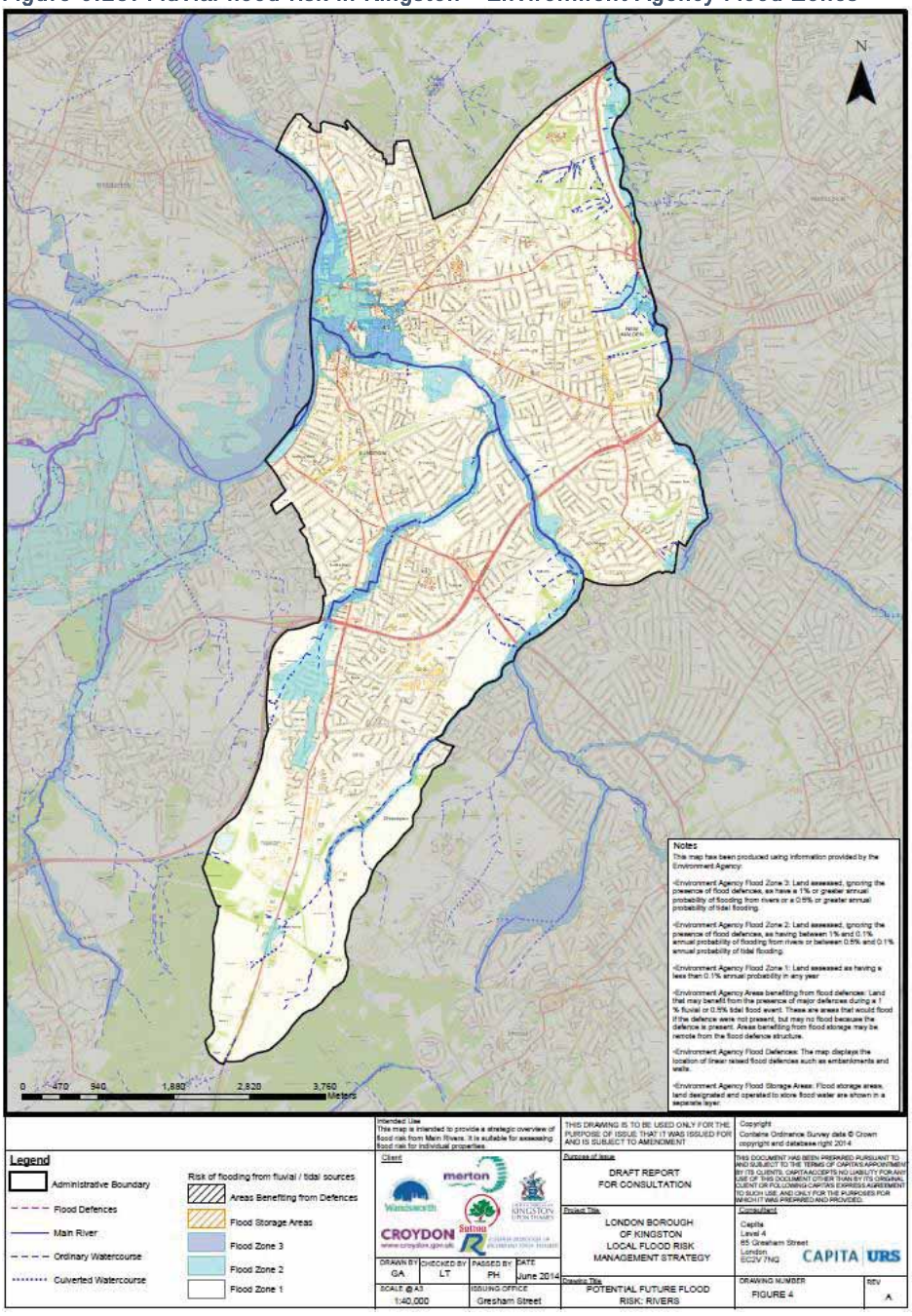


Table 6.49: Fluvial flood risk in Kingston - Properties located within EA Flood Zones

EA Flood Zone	Flood Risk	Dwellings	Non-Residential	Unclassified
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability (<0.1%)	*data not available*	*data not available*	*data not available*
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%)	*data not available*	*data not available*	*data not available*
Flood Zone 3a High Risk	More than 1 in a 100 annual probability (>1%)	*data not available*	*data not available*	*data not available*
Flood Zone 3b FuncFloodplain	More than 1 in 20 annual probability (>5% 'defended').	*data not available*	*data not available*	*data not available*

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.24: Surface water flood risk in Kingston based on the Government's Risk of Flooding from Surface Water (RoFSW) map

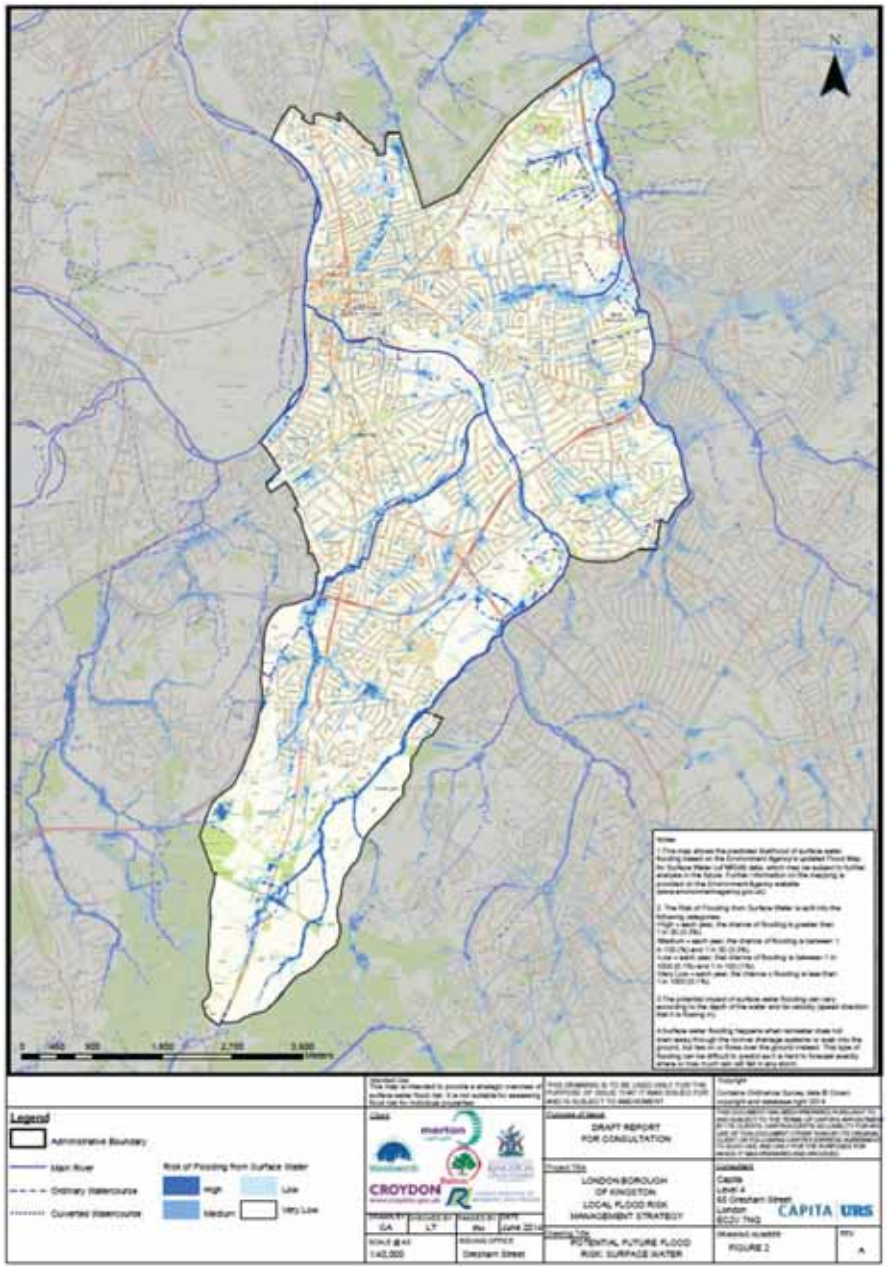


Table 6.50: Surface Water Flooding in Kingston: Dwellings at Risk in the 1 in 100 year event

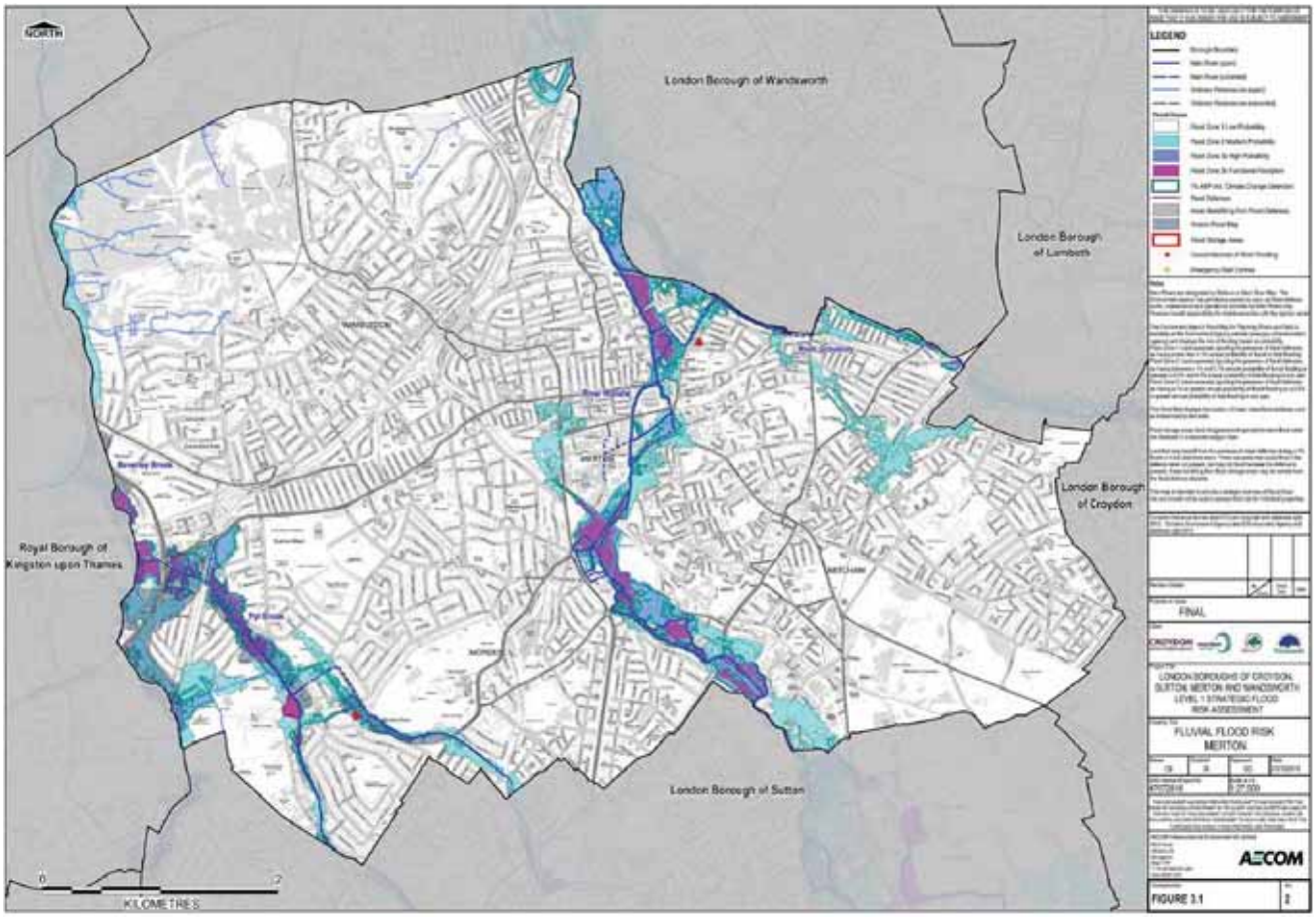
RoFSW [46]Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability (<1%)	*data not available*	*data not available*	*data not available*
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	*data not available*	*data not available*	*data not available*
High	More than 1 in a 30 annual probability (>3.3%)	*data not available*	*data not available*	*data not available*

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

[46] based on the Government's Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMfSW)

MERTON

Figure 6.25: Fluvial flood risk in Merton- Environment Agency Flood Zones



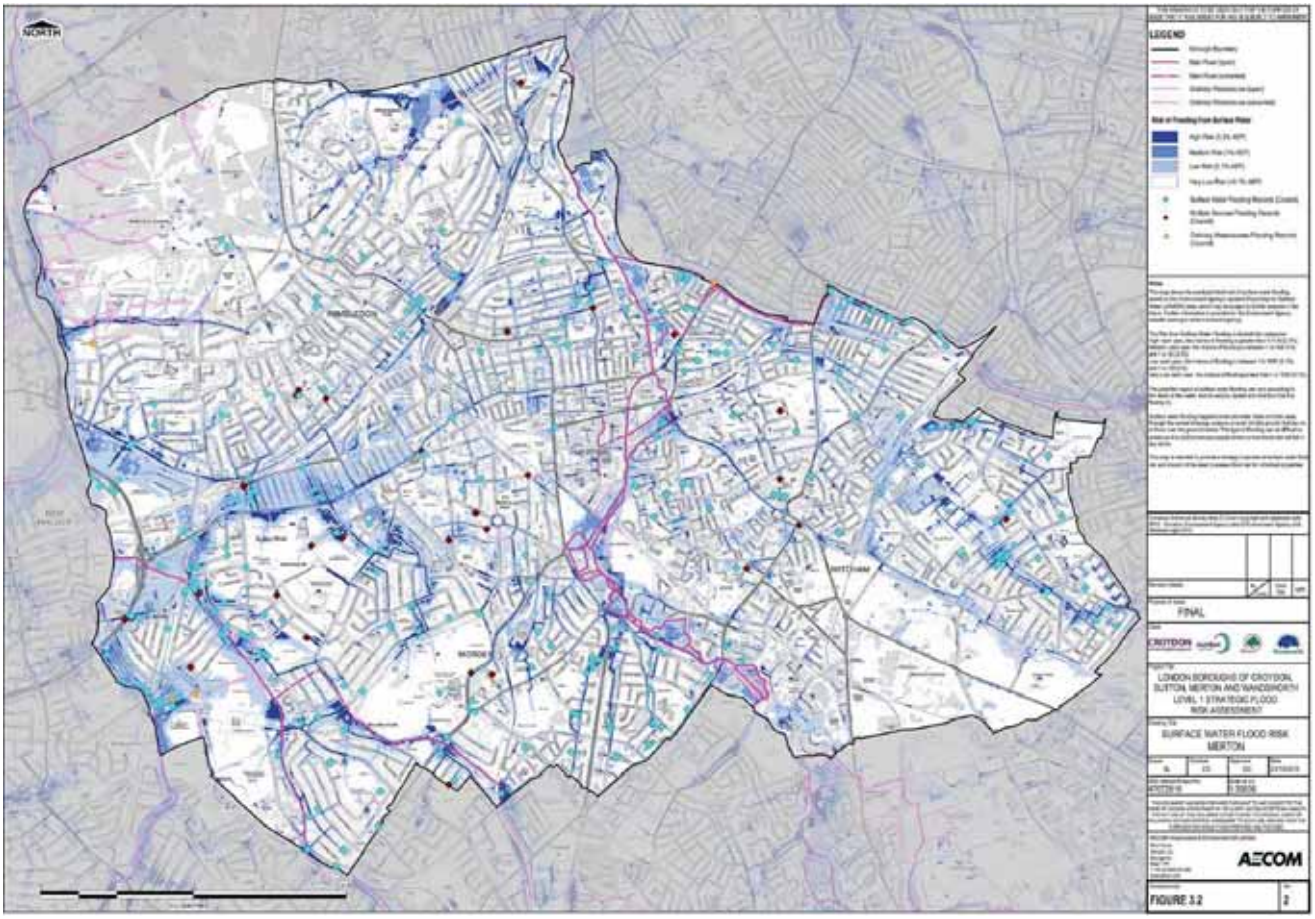
Source: SFRA Level 1 Report (AECOM, December 2015)

Table 6.51: Fluvial flood risk in Merton – Properties located within EA Flood Zones

EA Flood Zone	Flood Risk	Land Area of the Borough	Dwellings	Non-Residential	Unclassified
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability of flooding (<0.1%)	91.0%	78,864	3,698	6,496
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%)	5.2%	5,106	316	489
Flood Zone 3a High Risk	More than 1 in a 100 annual probability of flooding (>1%)	1.9%	1,272	101	136
Flood Zone 3b Functional Floodplain	More than 1 in 20 annual probability of flooding (>5% 'defended').	1.7%	254	20	61

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.26: Surface water flood risk in Merton based on the Government's Risk of Flooding from Surface Water (RoFSW) map



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

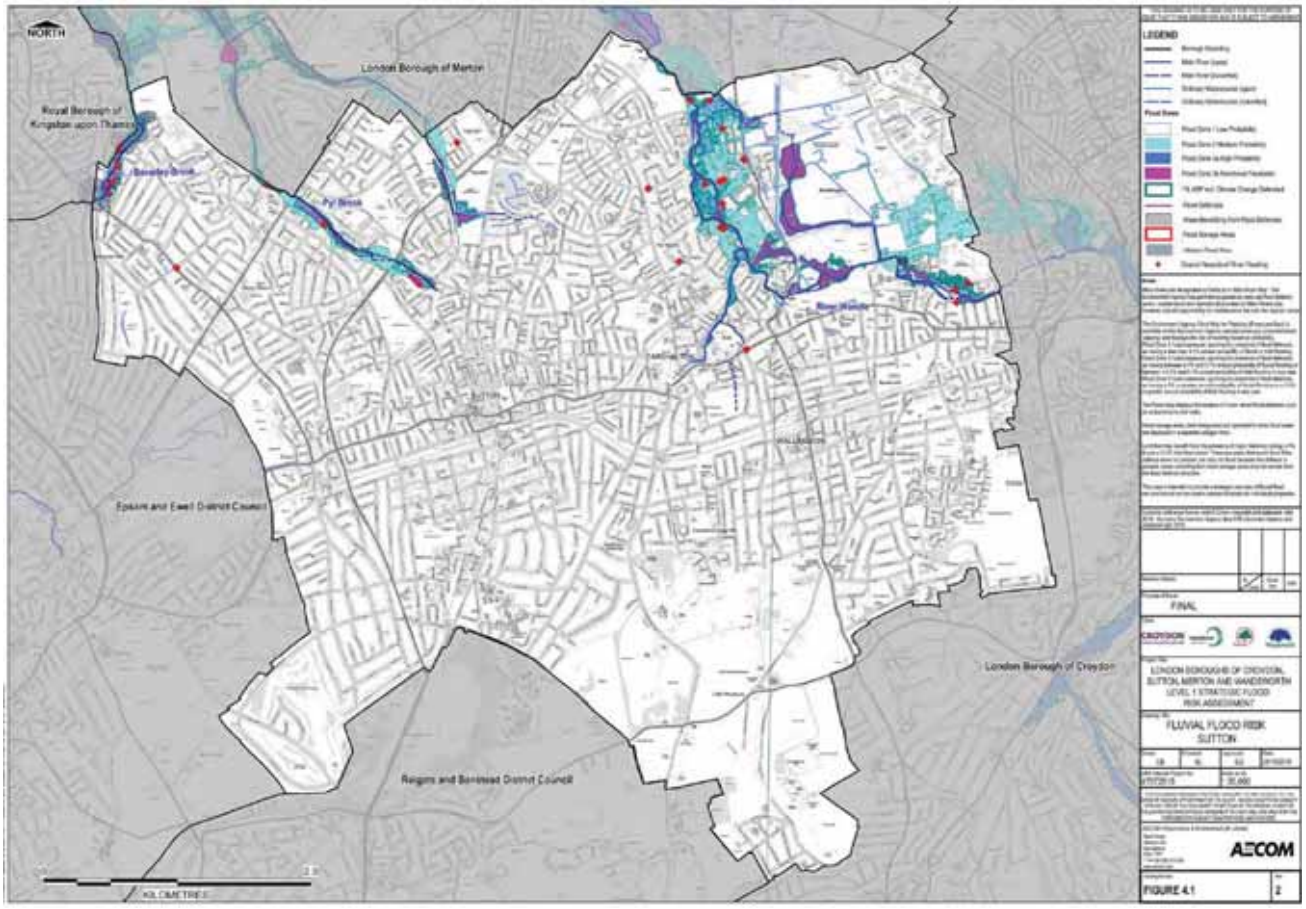
Table 6.47: Surface Water Flooding: Dwellings at Risk in Merton in the 1 in 100 year event

RoFSW Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability of flooding (<1%)	19,730	1,147	1,936
Medium	Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%)	4,361	439	190
High	More than 1 in a 30 annual probability of flooding (>3.3%)	1,668	176	247

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

SUTTON

Figure 6.27: Fluvial flood risk in Sutton - Environment Agency Flood Zones



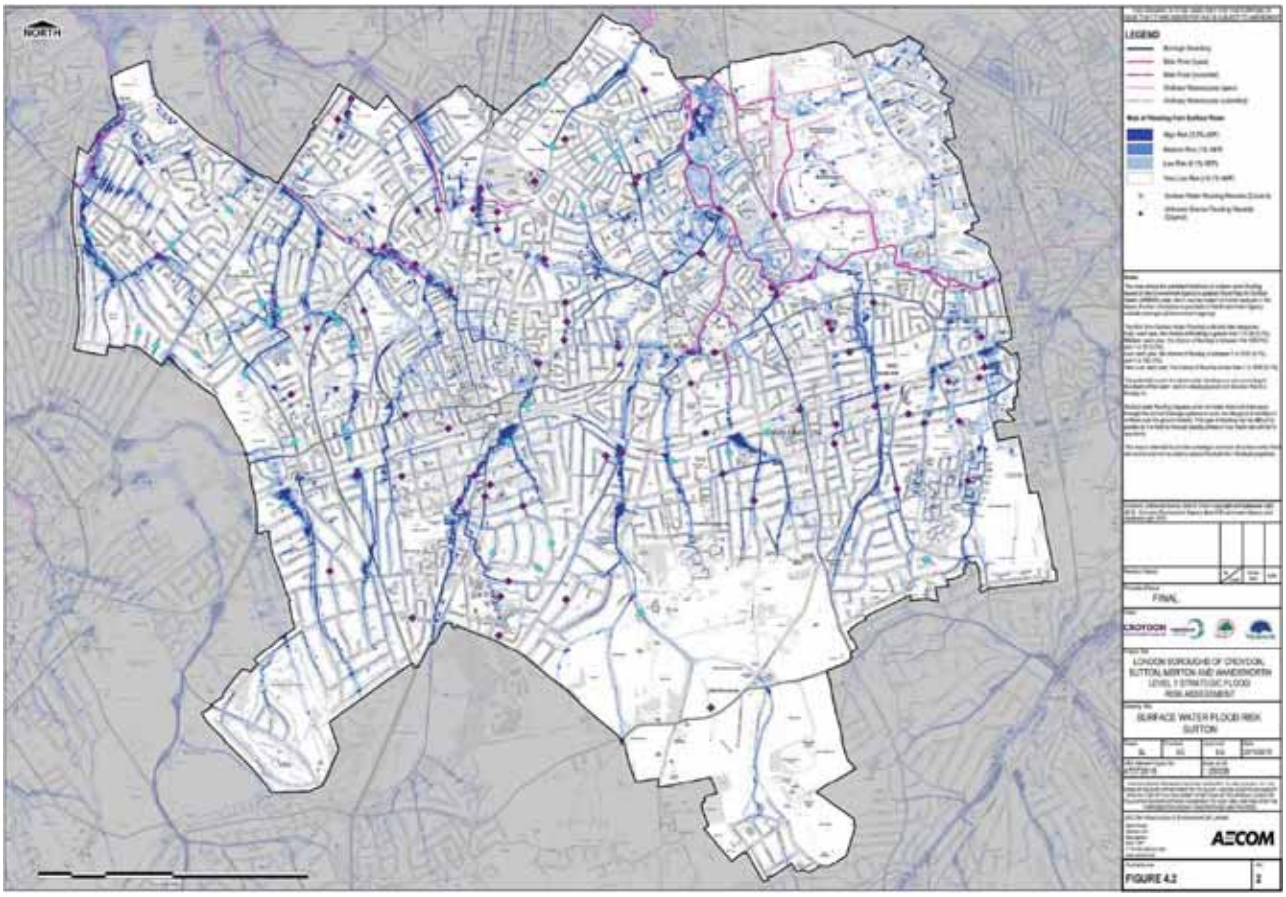
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.52: Fluvial flood risk in Sutton – Properties located within EA Flood Zones

EA Flood Zone	Flood Risk	Land Area of th Borough	Dwellings	Non-Residentia	Unclassified
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability of flooding (<0.1%)	96.3%	76,352	3,236	5,699
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%)	2.4%	1,889	167	181
Flood Zone 3a Hig Risk	More than 1 in a 100 annual probability of flooding (>1%)	1.0%	822	20	43
Flood Zone 3b Functional Floodplain	More than 1 in 20 annual probability of flooding (>5% 'defended').	0.2%	198	11	20

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.28: Surface water flood risk in Sutton based on the Government's Risk of Flooding from Surface Water (RoFSW) map



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.53: Surface Water Flooding in Sutton: Dwellings at Risk in the 1 in 100 year event

RoFSW Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability of flooding (<1%)	**15,429**	870	1,078
Medium	Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%)	**4,287**	325	303
High	More than 1 in a 30 annual probability of flooding (>3.3%)	2,860	267	219

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Sites of Importance for Nature Conservation (SINCs)

Table 6.54: Sites of importance for nature conservation (SINCs)

	Number of SINCs	SINC Area (ha)			SINC as percentage of borough
		Statutory Designations[47]	Non-Statutory	Total SINC	
Croydon	74	355 ha	1,245 ha	1,598 ha	18.5%
Kingston	38	46 ha	361 ha	405 ha	10.9%
Merton	57	322 ha	515 ha	836 ha	22.2%
Sutton	47	37 ha	634 ha	688 ha	15.7%

Source: Greenspace Information for Greater London (GiGL) (January 2019)

Species, habitats and ancient woodland

Table 6.55: Species and habitats

	Number of species	Priority Habitats	Ancient Woodland (ha)
Croydon	2,914	9/9	318.7 ha
Kingston	2,105	8/9	31.6 ha
Merton	3,761	8/9	0 ha
Sutton	2,442	7/9	0 ha

Source: Greenspace Information for Greater London (GiGL) (January 2019)

Green Belt and Metropolitan Open Land (MOL)

Table 6.56: Green Belt and MOL

	Green Belt		MOL		Green Belt + MOL as % of borough
	Area of Green Belt (ha)	Green Belt as % of borough	Area of MOL (ha)	MOL as % of borough	
Croydon	2,195	25.4%	413	4.8%	30.2%
Kingston	639	17.2%	545	14.6%	31.8%
Merton	0	0%	963	25.6%	25.6%
Sutton	605	13.8%	537	12.2%	26.0%
SLWP	**3,439**	**16.8%**	**2,458**	**12.0%**	**28.7%**
LONDON	35,109	22.0%	15,681	9.8%	31.9%

Source: Greenspace Information for Greater London (GiGL) (January 2019)

Public Open Space and Urban Green Space

Table 6.57: Public open space and urban green space

	Number of Open Spaces	Open Space Area (ha)	Percentage of Open Space
Croydon	362	2,787	32.2%
Kingston	264	1,378	37.0%
Merton	327	1,330 ha	35.4%
Sutton	97	618 ha	15.7%

Source: Greenspace Information for Greater London (GiGL) (January 2019)

[47] SSSI, SPA, SAC, NNR, Ramsar or LNR

Green Infrastructure

Table 6.58: Blue and green space coverage for SLWP boroughs and within the plan area

	Borough area (ha)	Green cover (ha)	Blue cover (ha)	Green &blue cover (ha)	Green cover (%)	Blue cover (%)	Green & blue cvr (%)
Croydon	8,649.4	4,802.8	11.6	4,814.4	55.5%	0.1%	55.7%
Kingston	3,726.1	1,953.4	39.3	1,992.7	52.4%	1.1%	53.5%
Merton	3,762.5	1,835.4	31.9	1,867.3	48.8%	0.8%	49.6%
Sutton	4,384.7	2,178.8	54.8	2,233.6	49.7%	1.2%	50.9%
SLWP	**20,522.7**	**10,770.4**	**137.6**	**10,908.0**	**52.5%**	**0.7%**	**53.2%**

Conservation Areas and Historic Environment

Table 6.59: Conservation Areas for SLWP boroughs and within the plan area

	Conservation Areas	Areas of Special Local Character (ASLCs)	Listed Buildings Grade I, II or II* (at risk)	Locally listed buildings	Scheduled Ancient Monuments	Historic Parks and Gardens
Croydon	12	24	167 (6)	1,000 (apprx)	7	not available
Kingston	26 (277 ha)	15	161 (3)[48]	148	6	not available
Merton	28 (657 ha)	n/a	243	1,042	3	3
Sutton	15 (208.2 ha)	23	205 (6)	106	6	5

Source: Historic England and Local Plans

Table 6.60: Archaeological Priority Areas: Croydon

APA	Size	APA	Size
TIER 1			
Croham Hurst Round Barrow	0.66	Park Lane Anglo-Saxon Cmtry	1.31
Riddlesdown Road	6.37	Russell Hill	24.66
Farthing Down	85.92	Elmers End	3.97
Lion Green Road	3.55	RAF Kenley	78.95
		Tier 1 Total	**205.39 ha**
TIER 2			
Addington and Addington Park	162.19	Pollards Hill	4.03
Central Croydon	90.25	Deepfield Way	1.95
Old Coulsdon	14.84	Hook Hill	14.99
Sanderstead	37.13	Cane Hill	79.27
Watendone	9.09	Ashburton Park	8.54
Ampere Way	126.69	Haling Grove	3.97
Waddon	65.93	Norwood Grove	9.99
Mere Bank	61.83	London to Brighton Roman Road	335.35
Addington Hills	104.36	London to Lewes Roman Road	37.54
Croham Hurst	82.36	Croydon 19th Century Cemeteries	14.35
Pampisford Road	31.49		
		Tier 2 Total	**1,296.1 ha**
TIER 3			
Croydon Downs	1,672.15		
		Tier 3 Total	**1,672.2**

LB Croydon total	**30 APAs**
Area	**3,173.7 ha**
Percentage of Borough	**36.7%**

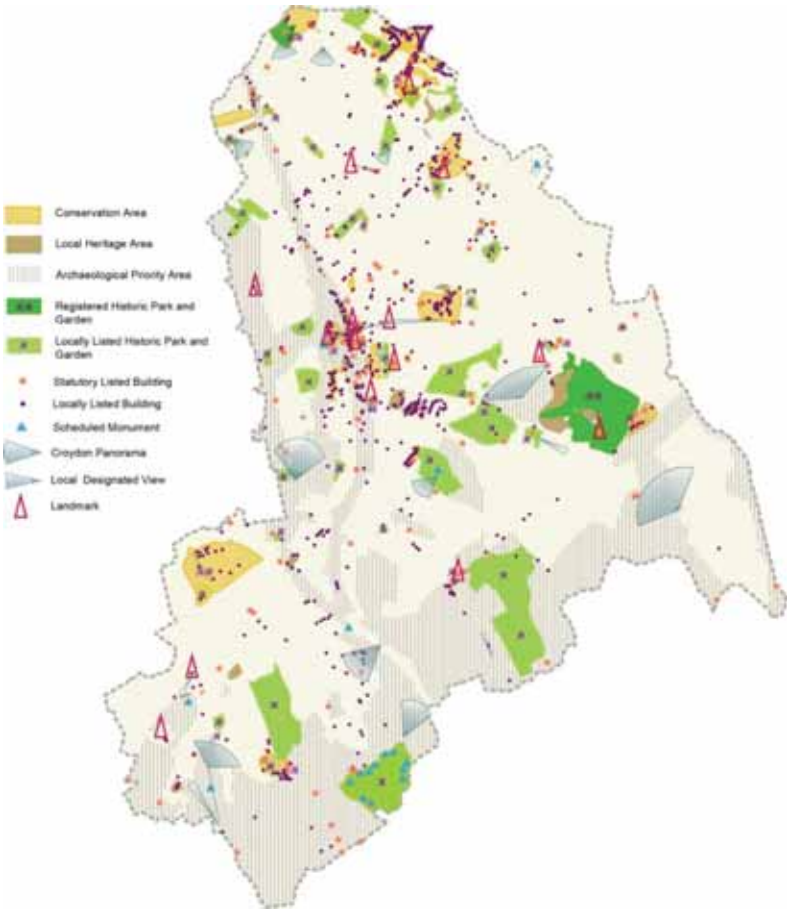
[48] despite the small number of statutory listed buildings in Kingston, there are over 200 designated 'Buildings of Townscape Merit' (BTM)

Table 6.61: Archaeological Priority Areas: Merton

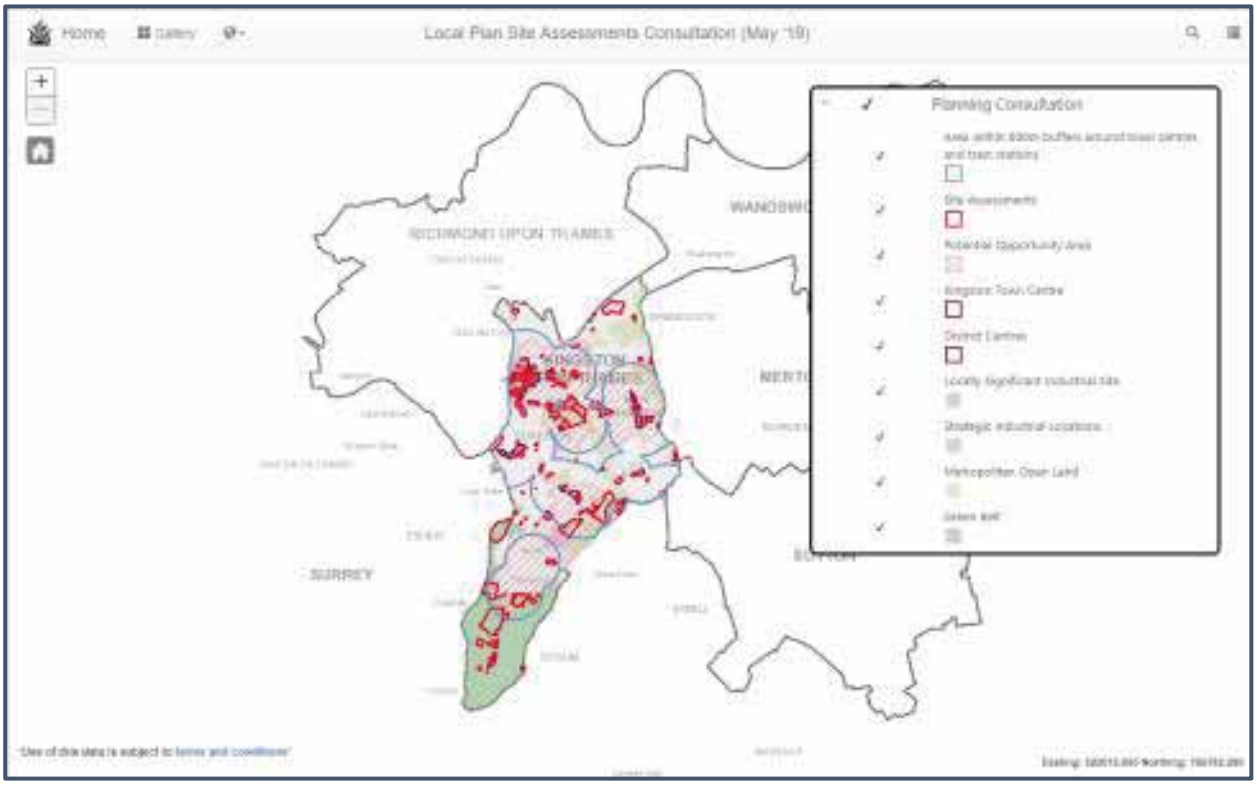
APA	Size	APA	Size
TIER 1			
Caesar's Camp	27.35	Morden Park Mound	0.42
Merton Priory	10.28	Ravensbury Saxon Cemetery	10.79
		Tier 1 Total	**48.84 ha**
TIER 2			
Wandle Valley / Colliers Wood	93.13	Cannizaro	67.64
Wandle Valley / Morden Hall Park	59.97	Cannon Hill	20.81
Wandle Valley / Mitcham	74.18	Merton Place	4.53
Wimbledon Common	237.41	Wimbledon Park House	90.07
Merton Village	47.48	Lavender Park	6.54
Mitcham	131.48	West Barnes Farm	5.22
Morden	48.41	Stane Street	47.84
Wimbledon Village	97.37	19th Century Cemeteries	32.67
		Tier 2 Total	**1.064.8 ha**
TIER 3			
Wandle Valley/Earlsfield	60.44	Mitcham Common	198.31
Beverley Brook	57.59		
		Tier 3 Total	**316.34 ha**

LB Merton total	**23 APAs**
Area	**1,429.9 ha**
Percentage of Borough	**38.0%**

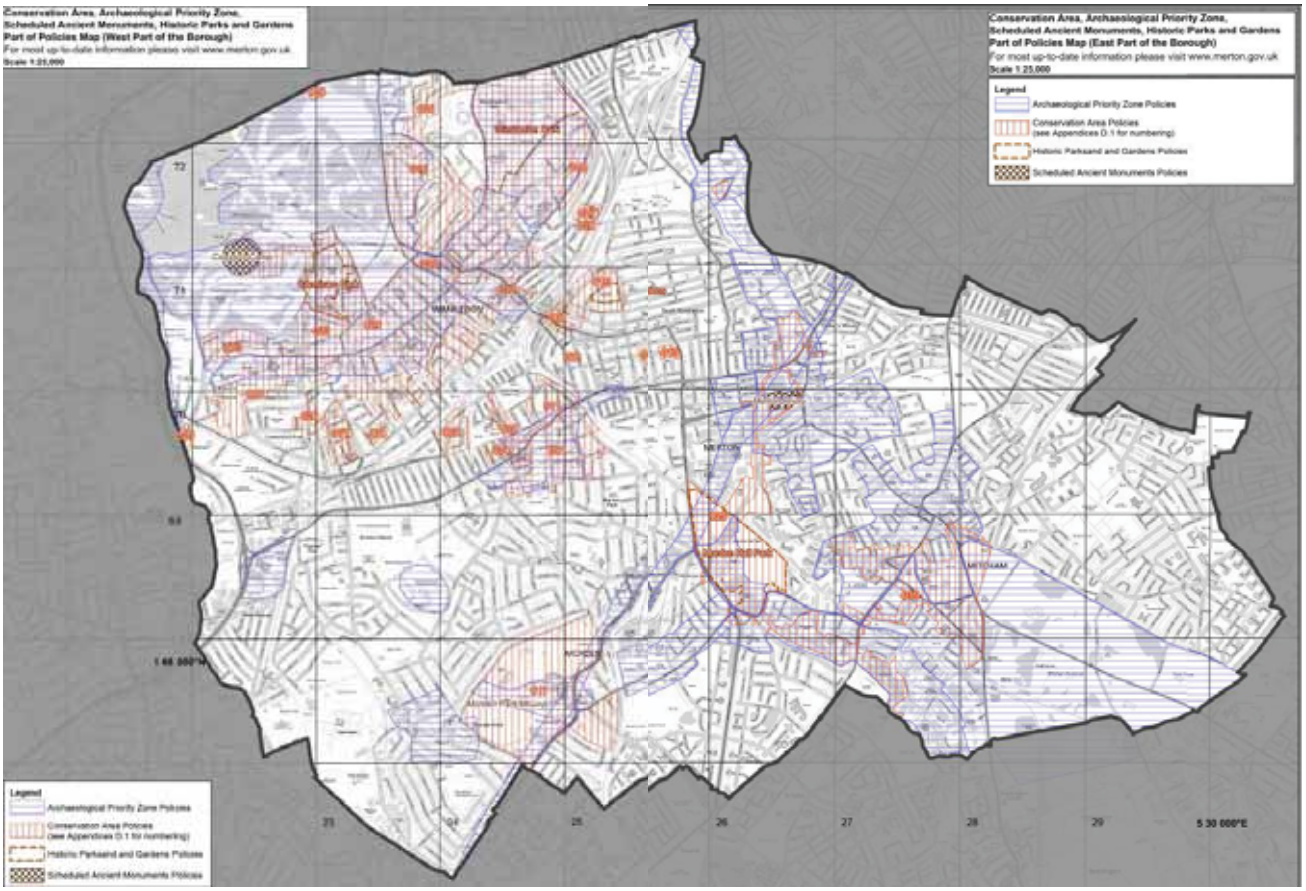
Heritage Map of Croydon



Heritage Map of Kingston[49]

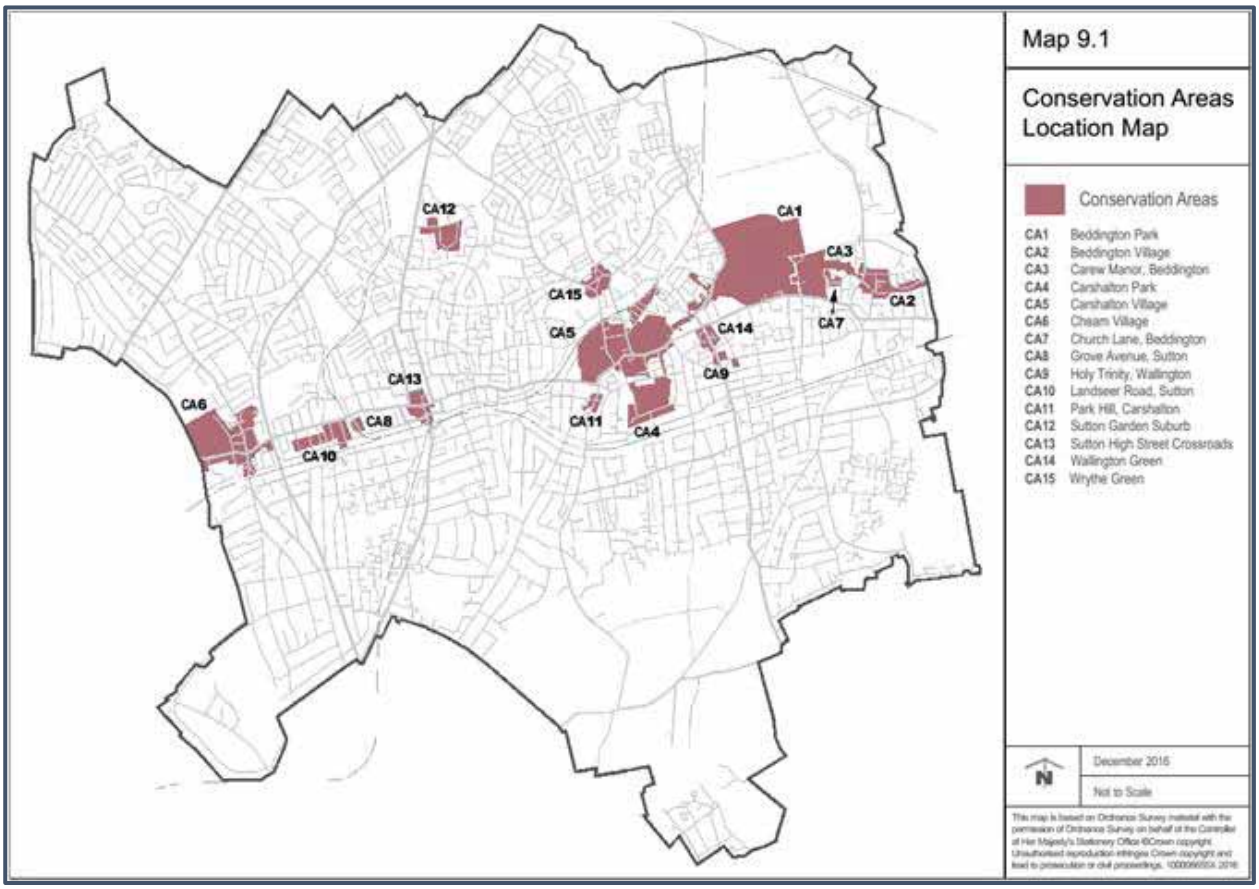


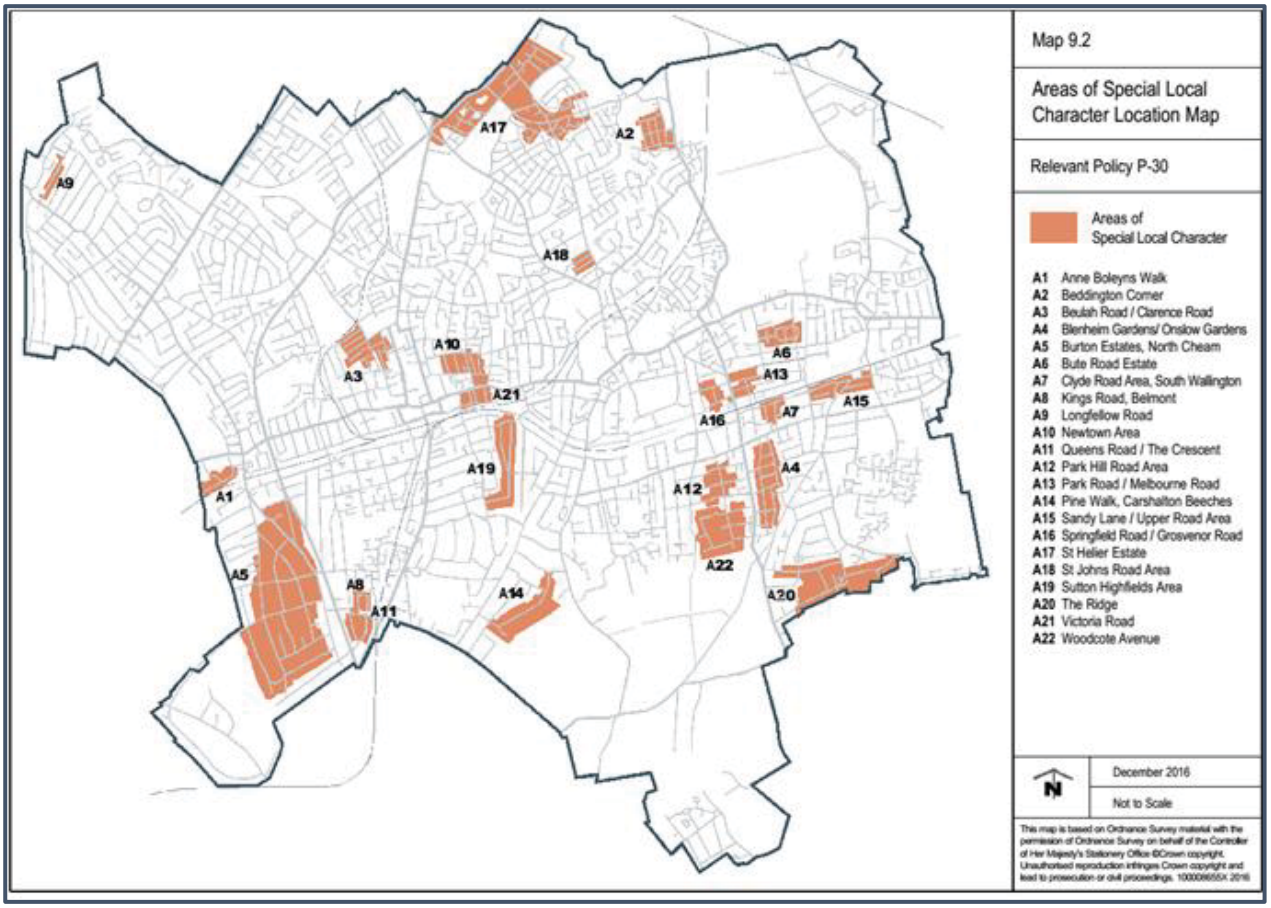
Heritage Map of Merton[50]



[49] https://maps.kingston.gov.uk/maps/MapPage.aspx?map=heritagef
[50] https://www2.merton.gov.uk/merton_sites_and_policies_part_ii_borough_wide_policies_maps.pdf

Heritage Maps of Sutton





7. Key Sustainability Issues (Task A3)

Identifying key sustainability issues and problems

7.1 This chapter sets out the key environmental, social and economic issues which need to be taken into account in preparing updated waste policies and proposals for inclusion in the new South London Waste Plan (SLWP). These have been identified on the basis of:

- key sustainability issues identified in government guidance on SA[51], current best practice and criteria developed previously for the purpose of appraising the existing SLWP, Sutton's Local Plan 2018 and the Intend to Publish London Plan.
- other policies, plans, programmes and sustainability objectives relevant to or likely to be affected by the new plan as set out in Section 5 of this document;
- the current environmental, social and economic baseline for the four boroughs and future trends, including projected household growth and industrial land supply, over the plan period to 2036 (Section 6);
- existing and planned waste management facilities within South London, annual throughputs of local authority collected waste (household), commercial and industrial (C&I), construction, demolition and excavation waste (CD&E) and other waste streams; waste imports and exports to and from the plan area; and current performance against the London Plan 2016 apportionment (Section 3); and
- existing planning constraints and emerging opportunities for promoting sustainable waste management practices in south London.

7.2 Further sustainability issues have been identified for inclusion in this chapter in the light of feedback from statutory consultees and the response to public consultation at the 'Issues and Preferred Options' stage.

Issue 1: Sustainable Waste Management: Self-Sufficiency

7.3 The key sustainability issues in relation to managing south London's waste arisings up over the plan period from 2021 to 2036 are as follows:

- how much additional land should the plan allocate for sustainable waste management to meet the combined apportionments for household and C&I waste[52] in the Intend to Publish London Plan (i.e. net self sufficiency) over the plan period?
- should the plan seek to either:
  - meet the new apportionment targets by safeguarding sufficient land and sites to manage 100% (and no more) of projected household and C&I waste arisings over the plan period to 2036? or
  - seek to further exceed the new apportionment targets by allocating additional land, promoting the intensification of existing sites or converting existing waste transfer facilities to waste management facilities?
- to what extent can the four boroughs seek to further reduce the level of waste exports to other waste planning authorities within the South East, particularly with regard to CD&E waste streams, given the available evidence on existing capacity and throughputs within the plan area and forecast arisings up to 2036;

[51] 'SA of Regional Spatial Strategies and Local Development Documents' (ODPM, November 2005)
[52] 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036

- how can the plan achieve an optimal balance between safeguarding sufficient land for waste management uses over the plan period and meeting the significant future demand for land for non-waste industrial uses, taking into account the borough classifications for the management of industrial floorspace capacity in the draft London Plan? (as detailed in Table 6.31 in Section 3, Sutton falls within the 'Provide Capacity' categorisation[53] and the remaining three boroughs fall within the 'Retain Capacity' categorisation);
- given that there is already sufficient capacity[54] within the four boroughs to manage forecasted construction and demolition waste arisings for the end of the plan period in 2036 (with a surplus of +5,895 tonnes per annum in 2036), to what extent – if at all - does the plan need to safeguard land for the management of future CD&E waste arisings?
- is there a need to allocate additional land, promote the intensification of existing sites within the plan area or make specific policy provisions for hazardous waste arisings in the new plan[55];
- how should progress against the combined apportionment and self-sufficiency targets be monitored over the plan period, and what level of contingency needs to be planned for in the light of existing management capacity and forecasts for future waste arisings up to 2036?
- what account should be taken of the following considerations, each of which may lead to a significant reduction in household and C&I and CD&E waste arisings over the plan period:
  - the Mayor's annual housing delivery targets for each of the four partner boroughs in the Intend to Publish London Plan (December 2019) are now significantly lower than those included in the draft London Plan (December 2017);
  - the GLA's recently updated 'housing-led' and 'trend-based' population projections (2018-based) (February 2020)[56] would suggest that there will be a significantly reduced rate of population increase - and hence less waste being generated - within each of the four Boroughs over the period of the new SLWP;
  - the Covid-19 pandemic, which has led to the introduction of a 'lockdown' throughout the UK from 23 March 2020, is expected to huge a hugely significant impoact on economic activity and industrial output for many years to come. It is a reasonable assumption that future levels of waste generation, at least for the early years of the new SLWP, are likely to be much lower than the current forecasts would indicate.

Issue 2: Sustainable Waste Management: Spatial Strategy and Strategic Approach

7.4 The key sustainability issues are as follows:

- is the spatial strategy and strategic approach of safeguarding and intensifying existing sites the most appropriate strategy compared to the other reasonable alternatives of:
  - safeguarding existing sites and identifying new sites;
  - safeguarding existing sites and designating preferred industrial areas; or
  - safeguarding existing sites and designating all industrial areas as potential waste sites?
- which existing waste management sites and areas, including those with waste management facilities already in place, other sites allocated in the existing SLWP and industrial areas already identified as potentially suitable for waste facilities, should continue to be safeguarded and therefore carried forward in the new plan?

[53] according to the 'Intend to Publish' London Plan 2019 and the London Industrial Land Supply and Economy Study (CAG Consultants 2016), LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations over the London Plan period
[54] the revised throughput figures in Section 3 (Table 3.6) indicate that there is already a surplus of capacity for construction and demolition waste
[55] CD&E waste arisings in South London are projected to increase from 523,526 tpa in 2021 to 550,975 tpa in 3036
[56] the GLA's updated 'housing-led' and 'trend-based' population projections (2018-based) (Feb 2020) are set out in Figure 6.3 (Section 3)

- which waste sites identified in the existing SLWP have since been developed, permitted and/or allocated for other uses and can no longer contribute towards managing south London's waste?
- how can the waste management capacity of existing waste sites, particularly waste transfer sites, be optimised through the intensification of uses?
- which existing waste management sites and industrial areas identified as potentially suitable for waste facilities have potential for intensification and/or for converting existing waste transfer facilities to waste management operations?
- to what extent can existing waste management facilities, existing site allocations and industrial areas already identified as potentially suitable for waste facilities contribute to meeting the capacity gap over the plan period both with and without the intensification of existing operations?.
- what criteria should be used to evaluate the suitability of any new waste sites, areas suitable for waste facilities or proposals to increase the capacity of existing sites?
  - the nature of the activity, its scale and location;
  - implementation of the waste hierarchy and contribution to the circular economy;
  - achieving a positive carbon outcome[57];
  - potential impacts on local amenity, including noise, odours, air quality and visual;
  - proximity to strategic routes and the impact of vehicle movements on local roads;
  - proximity to sustainable modes of transport;
  - physical and environmental constraints, including flood risk;
  - proximity to residential areas and other sensitive receptors;
  - job creation and social benefits, including skills, training and apprenticeships; and
  - potential for intensification or co-location with complementary industrial/waste uses.
- is the balance between the four boroughs in terms of waste management capacity appropriate given that Sutton (664,641 tpa) and Merton (213,179 tpa) currently manage a much larger share of household and C&I waste arisings than Kingston (35,642 tpa) andd Croydon (32,883 tpa)?

Issue 3: Sustainable Waste Management: Prevention, re-use, recycling and recovery

7.5 The key sustainability issues are as follows:

- how can the plan help to deliver a further shift towards practices towards the top of the government's waste hierarchy?
- can the plan further encourage minimisation and prevention through the reuse of materials and using fewer resources in the production and distribution of products?
- how can the plan contribute towards the following targets in the draft new London Plan and London Environment Strategy:
  - the equivalent of 100% of south London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
  - zero biodegradable or recyclable waste to landfill by 2026;
  - at least 65% recycling of municipal waste by 2030;
  - 95% reuse/recycling/recovery of construction and demolition waste; and
  - 95% beneficial use of excavation waste
- what scope exists for the plan to support even higher recycling targets for municipal waste than the 65% target set out in the London Environment Strategy ?

[57] the draft new London Plan requires that all energy from waste (EfW) facilities must demonstrate a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced

Issue 4: Sustainable Waste Management: Promoting the Circular Economy

7.6 The key sustainability issues are as follows:

- can the plan help to promote a transition to a circular economy within south London that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible?
- how can the potential economic benefits of the plan be maximised in terms of job creation and supporting the local manufacturing sector by achieving resource efficiency, waste reduction and a significant improvement in reuse and recycling performance[58] (reuse, repair, re-manufacturing and materials innovation)?
- should the plan support the co-location of complementary uses such as secondary material processing facilities in order to support manufacturing from waste?
- can the plan support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets?
- should the plan consider introducing a requirement for all major planning applications to achieve 'net zero-waste' and be supported by a Circular Economy Statement?
- should the plan seek to promote technologies that produce fuels that can be used to power waste management and industrial processes (e.g. biofuels and hydrogen)?

Issue 5: Climate Change Mitigation

7.7 The key sustainability issues are as follows:

- should the policies and proposals of the plan be 'technology neutral' or promote specific technologies?
- should the policies and proposals of the plan actively promote opportunities to use residual waste arisings in south London as a renewable source of energy to power complementary waste management or other industrial processes?
- in the context of the current 'climate emergency'[59], should the plan go beyond current London Plan policy requirements to further minimise CO_2 emissions on-site through application of the Mayor's updated energy hierarchy and achieve zero carbon standards through developer contributions to a council-managed carbon offset fund?
- should policy measures be included to minimise embodied energy and the 'carbon footprint' associated with construction materials used for new waste management facilities as measured by the BRE's[60] Building life cycle assessment' methodology.

Issue 6: Climate Change Adaptation

7.8 The key sustainability issues are as follows:

- how can the design and layout of new waste management facilities incorporate green infrastructure and maximise its benefits for a range of adaptation objectives, including flood risk management, urban cooling, mitigation the impact of drought conditions, maintaining biodiversity and habitats and environmental enhancement?
- to what extent can the design and layout of new or upgraded waste management facilities minimise overheating and contribution to the urban heat island (UHI) effect, for example by

[58] 'Towards a circular economy, LWARB 2015 and Employment and the circular economy – job creation through resource efficiency in London' (LWARB 2015) available at http://www.lwarb.gov.uk/what-we- do/accelerate-the-move-to-a-circular-economy-in-london/
[59] in July 2019, the London Borough of Sutton declared a climate emergency and a borough target to achieve net zero carbon by 2030
[60] Building Research Establishment

permeating the development with blue and green spaces and incorporating a range of natural cooling measures as part of the design and layout, including passive design measures (e.g. building orientation), shading, planting and soft landscaping, trees, ponds, SUDS measures and other surface water features?

- the need for the plan to supportr continued partnership working with the Environment Agency (EA) to ensure waste management infrastructure is fit for purpose and resilient to a changing climate and to support a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process;
- should the plan set minimum green infrastructure targets for all new or upgraded waste management facilities and require green roofs wherever feasible? and
- what contribution can the plan make towards the Mayor's long-term target for more than 50% of London to be green by 2050?

Issue 7: Flood risk, sustainable drainage (SuDS) and water resources

7.9 The key sustainability issues are as follows:

- what additional policy measures should be included to minimise all sources of flood risk to and from new and existing waste management sites in south London and to reduce flood risks overall, taking climate change into account?
- to what extent can the 'sequential' and 'exceptions tests' be applied to the identification of waste management sites for inclusion in the new plan, taking account of the latest available information on flood risk in south London[61]?
- should the plan include further policy measures to require all waste proposals to incorporate SuDS measures and achieve greenfield run-off rates and volumes?
- how can any residual flood risks arising from waste management sites be safely mitigated through the use of flood resistance or resilience measures where required?
- how can the plan help to ensure that waste facilities and related activities do not adversely affect the quality of watercourses or groundwater within south London?
- how can the plan promote water efficiency measures in existing and new waste facilities having regard to the proximity of vulnerable natural water stores

Issue 8: Sustainable design and construction

7.10 The key sustainable design and construction issues are as follows:

- should the plan set a minimum BREEAM rating[62] to be met by all new waste management facilities or should this policy requirement take account of the nature of the proposed facility (e.g. sorting and baling facility only, shell buildings or the full-scale redevelopment of a large site)?
- what alternative accreditation methods could be used in place of BREEAM to demonstrate the environmental performance of newly proposed waste management facilities e.g. the CEEQUAL scheme[63] developed by the Building Research Establishment (BRE) for infrastructure projects?

[61] based on the joint strategic flood risk assessment (SFRA) Level 1 and Level 2 reports for Croydon, Merton, Sutton and Wandsworth (AECOM, 2015), the EA's flood map for planning and 'Risk of Flooding from Surface Water (RoFSW)' map

[62] the appropriate scheme is currently the BREEAM New Construction 2018

[63] the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at https://www.ceequal.com/

- should the plan seek to further minimise environmental life cycle impacts by requiring developers to conducting Life Cycle Assessment and integrating its outcomes in the design decision-making process?
- should the plan include policy criteria to further minimise environmental impacts from construction products[64]?
- should the plan further encourage responsible sourcing of construction products?
- should the plan include policy measures to increasing the lifespan of the waste-related buildings through designing for durability and adaptability? and
- should the plan include policy criteria to encouraging the reduction of environmental impacts through optimising the use of materials during all stages of the project?

Issue 9: Transport

7.11 The key sustainable design and construction issues are as follows:

- what further policy measures are needed to minimise HGV movements, traffic congestion, greenhouse gas emissions, local air pollution, noise and vibration associated with waste-related transport within south London?
- to what extent can the plan support sustainable transport objectives by:
  - locating waste management facilities close to where waste is produced?
  - maximising opportunities for the intensification of existing waste sites and industrial areas identified as potentially suitable for waste facilities thus avoiding the need for new waste management sites to be developed and associated trips?
  - co-locating complementary waste management or secondary material processing facilities in line with circular economy principles?
- how can the plan minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors?
- is the capacity and condition of the existing local and strategic road network within south London sufficient to accommodate the expected growth in waste-related trips associated with dealing with south London's waste apportionment up to 2036?
- the need to take account of cumulative impacts on the local and strategic road network;
- contributions may be requested towards improvements that support travel for staff on foot, cycle or by public transport where appropriate. Furthermore, cycle parking and car parking, including the provision of electric charging facilities, should be in line with the draft London Plan policies T5 and T6?
- the need to ensure that safeguarded waste sites do not conflict with the planned Crossrail 2 southern hub at Wimbledon; and
- how can the plan increase the potential role of sustainable modes of transport e.g. rail in transporting south London's waste arisings?

Issue 10: Air Quality

7.12 The key sustainability issues in relation to air quality are:

- how can the policies and proposals of the plan further mitigate the potential impacts of local air pollution arising both from the operation of new and existing waste management facilities and associated transport movements?

[64] for example through requiring submission of Environmental Product Declarations (EPD)

- how can the plan contribute towards improving air quality within identified Air Quality Management Areas (AQMAs) and other areas where national standards for particulates (PM10) and nitrogen oxides (NO_x) are currently being breached?
- what further policy requirements should be incorporated as part of the plan to ensure that proposed waste developments within south London are at least 'air quality neutral' based on the emissions benchmarks set out in the Mayor's Sustainable Design and Construction SPG?
- how can the policies and proposals of the plan promote the use of design solutions, such as green infrastructure and screening, to prevent or minimise increased exposure to existing air pollution?
- to what extent can the plan require potentially polluting waste management operations such as the sorting of recyclables to be enclosed?
- in seeking to mitigate the potential impacts of local air pollution, can the plan maintain a 'technology neutral' approach to the development of waste management facilities? And;
- to what extent should the plan should allocate broad types of facility to each site e.g. enclosed or open?

Issue 11: Environmental protection

7.13 The key issues in relation to minimising the potentially adverse impacts of waste management facilities on environmental quality and local amenity are as follows:

- should the plan include policy criteria to mitigate the adverse effects of noise, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?
- what locational criteria should be used to assess the suitability of new waste management facilities in terms of the proximity of sensitive receptors to noise, vibration and odours generated during both the construction and operational phases;
- should the plan set out common requirements in relation to the content of Construction Environmental Management Plans submitted in support of proposals for new waste management facilities across the four partner boroughs?
- how can the plan limit potential pollution associated with the operation of waste management facilities and its potentially adverse impacts on neighbouring uses?
- what further policy measures should be included to reduce the number and total area of contaminated sites within south London requiring remediation? and
- what further policy measures or criteria should be included in the plan to further prioritises the re-use of previously-developed ('brownfield'), derelict or underused land/ premises within south London for waste management uses?
- how should the new plan incorporate the 'agent of change' principle, as set out in national and regional planning policy, in order to ensure that new sensitive developments located close to established waste uses are required to incorporate appropriate mitigation measures in order to minimise potential adverse environmental impacts on occupants;
- the need to take account of high voltage overhead lines and the hiugh pressure gas grid in identifying new or intensified waste sites.

Issue 12: Biodiversity and Habitats

7.14 The key sustainability issues in relation to biodiversity and habitats are as follows:

- is the plan likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?

- what approach should be followed in screening the plan at the issues and options stage to determine whether or not a Habitats Regulations Assessment (HRA)[65] needs to be carried out?
- which European sites are in sufficiently close proximity to the south London plan area to be considered for the purpose of HRA screening? Richmond Park SAC; Wimbledon Common SAC; Mole Gap to Reigate Escarpment SAC; and/or Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA)?
- how should the plan ensure that new and existing waste management facilities minimise any potential impacts upon regionally or locally designated wildlife sites?
- how will the plan potentially affect local Biodiversity Action Plan (BAP) targets in relation to priority habitats and species within each of the four partner boroughs; and
- how can the waste plan maximise the area of habitat created, improved or managed as a consequence of waste related developments and promote opportunities for enhancing river catchments and local green corridor networks.

Issue 13: Local Economy and Employment

7.15 The key sustainability issues are as follows:

- how can the plan's effectiveness be maximised in promoting investment, local employment opportunities and the competitiveness of the waste management sector within South London, particularly by promoting the circular economy and new waste management technologies nearer the top of the waste hierarchy?
- in order to ensure that employment land supply matches demand across the four boroughs, and given that most industrial uses[66] have a significantly higher jobs density than waste management uses, should the plan seek to retain employment land for industrial uses within strategic industrial locations (SIL) and established industrial areas, and therefore no longer identify these areas as potentially suitable for waste management uses (provided that sufficient sites can be allocated to meet the apportionment up to 2036)
- how much industrial land and floorspace within the four south London boroughs and across the wider Wandle Valley Property Market Area (including Wandsworth) should be retained or potentially released for waste related uses having regard to (a) the need to maintain a sufficient supply of land and premises to meet current and future demands for industrial (non-waste-related) and related functions; and (b) the borough-level categorisations in Table 6.2 of the London Plan which identifies that Sutton should 'provide capacity' and that the other three boroughs should 'retain capacity' for non-waste related industrial uses.
- to what extent should the plan promote co-ordination initiatives with London Remade and other partners to ensure that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?
- in promoting south London's transition towards a circular economy, how can the plan maximise economic benefits to local communities in the form of new products and employment, for example through managing waste more locally by optimising existing facilities and building new reuse and recovery facilities?
- what is the potential contribution of the plan in promoting south London's economy, facilitating innovation and competitiveness and supporting existing businesses to expand and new business to start-up (particularly SMEs).

[65] also known as 'Appropriate Assessment'

[66] these are generally uses falling within the Use Classes B1(b) research & development, B1(c) light industrial; B2 industrial and manufacturing; and B8 storage & distribution and therefore appropriate forms of development within SILs and established industrial areas

Issue 14: Historic Environment, Townscape and Visual Amenity

7.16 The key sustainability issues are as follows:

- how can the plan ensure that new and existing waste management facilities do not adversely impact upon the historic environment of the four boroughs – specifically the character, appearance and setting of Conservation Areas; Areas of Special Local Character (ASLCs); listed buildings, historic parks and gardens, scheduled ancient monuments (SAMs) and Archaeological Priority Areas?
- how can the plan ensure that the plan preserves and enhances the quality and distinctiveness of south London's historic environment and cultural assets?
- the need to conserve and enhance designated and non-designated heritage assets (including archaeology) and the contribution made by their settings;
- how can the plan avoid increasing the number of heritage assets at risk from neglect, decay or development pressures?
- How can the plan protect areas where there is likely to be a further significant loss or erosion or landscape/townscape character or quality, or where development has had or is likely to have a significant impacts (direct or indirect) upon the historic environment and/or people's enjoyment of it?
- how can the plan avoid adverse effects upon the historic environment arising from traffic congestion, air quality, noise pollution and other issues?
- how can the plan ensure that new and existing waste management facilities are constructed to high quality design principles that respect local character and do not adversely affect local townscape? and
- how can the plan minimise the number of new waste management facilities located within areas of designated landscape value?

Issue 15: Human Health and Quality of Life

7.17 The key sustainability issues are as follows:

- how should the plan protect and enhance local amenity and the quality of the townscape for residents living near new and existing waste management facilities?
- how should the plan minimise the potentially adverse impacts of waste developments, transport and associated activities on public health and promote 'Healthy Streets' principles in line with the Mayor's Transport Strategy?
- how can the plan minimise potential conflicts with vulnerable road users and the risk of accidents involving waste vehicles in line with the Mayor's Vision Zero approach and ensure the safe operation of waste management facilities for employees and visitors?
- should the plan include a requirement for proposed waste developments to be accompanied by a Delivery and Servicing (DSP) plan?
- how can the design and layout of waste management facilities integrate 'designing out crime' principles and contribute to public perceptions of safety?
- how can the policies and proposals of the plan help to ensure that new or upgraded waste management facilities within south London promote inclusive designs
- how can the amenity and quality of life of local residents be balanced against the operational requirements of new or upgraded waste management facilities within south London, particularly within areas affected by social deprivation
- is the current level of protection for the permanence, integrity and openness of Green Belt and Metropolitan Open Land (MOL) within the four boroughs sufficient?

- how should the plan minimise the loss of public open space and ensure that there is no increase in the area of public open space deficiency as a consequence of waste development?
- should the plan include policy criteria to further minimise potential visual intrusion of waste related developments on nationally or locally important landscapes?
- how can the plan tackle waste crime (in 2015, illegal waste activity was estimated to have cost over £600 million in England alone)? and
- how can the plan ensure that waste related developments do not adversely affect strategic views from within and from outside the plan area?

Issue 16: Equalities, Accessibility and Social Inclusion

7.18 The key sustainability issues are as follows:

- what criteria should be identified as the basis for carrying out an Equalities Impact Assessment (EqIA) on the emerging plan?
- how can the plan enhance public access for all groups of the population, including equalities groups, to reuse and recycling centres accepting household waste in South London?
- how can the plan further promote social inclusion by addressing potential inequalities arising as a result of current waste management arrangements in south London.
- In what ways can the plan address fuel poverty issues?
- should the plan maximise the potential for locating waste management facilities within easy access of areas of social deprivation (as measured by the employment and income domains of the Government's Index of Multiple Deprivation) and thus providing new employment opportunities in the waste management sector?
- how can the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?
- what is the potential contribution of the plan to achieving an increase in public awareness of sustainable waste management issues?
- what benefits can the plan deliver to local communities in the form of new products and employment, for example by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?
- how can the policies and proposals of the plan help to address inequalities, particularly within deprived areas, encourage social cohesion and promote inclusive neighbourhoods? and
- how can the plan help to promote job opportunities for all?

8. Sustainability Appraisal Framework for the South London Waste Plan (Task A4)

Developing Sustainability Objectives, Indicators and Targets

8.1 A comprehensive range of sustainability objectives, indicators and targets has previously been identified through the SA Scoping Report and subsequently at the issues and preferred options stage (with minor amendments) for the purpose of appraising emerging plan options. The finalised SA Framework, which has been carried forward in this report, has been developed on the basis of other policies, plans, programmes identified in Section 5 (Task A1); the environmental baseline in Section 6 (Task A2); and the key issues identified in Section 7 (Task A3). As shown in Table 8.2 overleaf, the SA Framework consists of 16 broad topic areas reflecting the aims of national planning policy, the Mayor's Environmental Strategy, the Intend to Publish London Plan and local planning objectives. These are arranged under the categories of (a) sustainable waste management (b) climate change (c) environmental quality, and (d) community well-being.

8.2 The full SA Framework, including sustainability objectives, appraisal questions, indicators and a cross reference to the key issues identified in Section 7, is set out in Table 8.3. It should be noted that the SA Framework overlaps to some extent with the SLWP Monitoring and Contingency Table included as Appendix 1 of the draft plan, particularly in relation to the waste hierarchy and self-sufficiency targets for South London.

Scoring system

8.3 The scoring system for use in the appraisal of preferred policy options and strategic alternatives, including significance ratings, is set out below in Table 8.1.

Table 8.1: Scoring system for use in the appraisal

Symbol	Scale of effect
+++	Large beneficial impacts
++	Medium beneficial impacts
+	Smaller beneficial impact
-	Neutral or no impact
x	Smaller negative impact
xx	Large negative effect.
?	Uncertain impact and/or the nature and magnitude of the impact is subject to the implementation of other planning policies.

Plan monitoring

8.4 In order to address the requirement for plan monitoring in the national planning policy framework (NPPF) and feedback received at the issues and preferred options stage, a 'Monitoring and Contingency Table' has been included in Appendix 1 of the draft Plan (Submission Version). Annual reporting of the indicators and targets in the Monitoring and Contingencies Table will take place through the preparation of Sutton's Authority Monitoring Report (AMR).

8.5 The SA Framework developed through the sustainability appraisal process has helped to ensure that the Monitoring and Contingencies Table covers an appropriate range of indicators.

Table 8.2: Summary of the SA Framework

(A) SUSTAINABLE WASTE MANAGEMENT
(1) Net Self-sufficiency To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period. **(2) Spatial Strategy and Strategic Approach** To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land. **(3) Waste re-use, recycling and recovery** To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery **(4) Circular economy** To promote a transition to a circular economy within south London.
(B) CLIMATE CHANGE
(5) Climate Change Mitigation To address the causes of climate change by minimising CO2 emissions from waste facilities. **(6) Climate Change Adaptation** To ensure that all waste management facilities are fully adapted to the impacts of climate change. **(7) Flood risk and sustainable drainage (SuDS)** To avoid, reduce and manage flood risk to or from waste management facilities. **(8) Sustainable Design and Construction** To promote the highest standards of sustainable design and construction in new waste facilities.
(C) ENVIRONMENTAL QUALITY
(9) Transport To reduce trips, traffic congestion and pollution arising from waste –related HGV movements. **(10) Air Quality** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities. **(11) Environmental protection** To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases. **(12) Biodiversity and Habitats** To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive.
(D) COMMUNITY WELL-BEING
(13) Local Economy and Employment To promote local employment opportunities, and the competitiveness of the waste management sector within South London. **(14) Historic Environment, Townscape and Visual Amenity** To avoid the potentially adverse impacts of waste management facilities on the historic environment, townscape quality and visual amenity by promoting high standards of design and layout. **(15) Human Health and Quality of Life** To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment. **(16) Equalities, Accessibility and Social Inclusion** To reduce exclusion, address inequalities & improve accessibility for all equalities target groups.

SA FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN

SA Objective	Appraisal Questions	Indicators	Issue Ref
(A) SUSTAINABLE WASTE MANAGEMENT			
Objective 1: Net self-sufficiency To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period	➢ *Will the policy or proposal help to provide sufficient sites and waste management facilities in south London to meet the combined apportionment targets[69] for household and commercial & industrial (C&I) waste over the plan period?* ➢ *Will the policy or proposal help to provide sufficient sites and waste facilities to manage other waste arisings, including construction, demolition & excavation (CD&E) waste and hazardous waste, over the plan period?* ➢ *Will the policy or proposal reduce waste arisings needing to be managed by promoting waste reduction, reuse and manufacturing from waste?* ➢ *Will the policy or proposal reduce the proportion of recyclable waste exported outside the plan area?*	➢ current and future household, C&I, CD&E and hazardous waste arisings in south London over the plan period (tpa) ➢ number, site area (ha) and capacity (tpa) of new and existing waste management facilities within south London by facility type and waste stream. ➢ combined tonnage of household and C&I waste managed within south London as a proportion of total arisings and the London Plan apportionment (tpa) (%) ➢ tonnage of other waste streams managed as a proportion of arisings, including CD&E and hazardous waste (%). ➢ number of allocated and windfall sites developed for new waste management facilities, intensification of uses or for manufacturing from waste respectively (ha) ➢ tonnage of recyclable waste exported outside area (tpa)	Section 7, Page 91
Objective 2: Spatial strategy and strategic approach To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land	➢ *Will the policy or proposal help to optimise and intensify the capacity of waste management sites and other industrial uses within south London compared to reasonable alternatives?* ➢ *Will the policy or proposal facilitate linked trips and optimise the location of new waste facilities with respect to proximity to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors?* ➢ *Will the policy or proposal optimise the distribution of waste management sites within south London?*	➢ number of sites and area of employment land intensified for waste management uses, complementary uses such as manufacturing from waste or other industrial uses (ha) ➢ increased tonnage of waste managed on intensified waste sites by waste stream (LACW, C&I and CD&E) & total (tpa) ➢ number and area of existing waste transfer sites converted to waste management operations (ha) ➢ proximity (m) of new or upgraded sites to strategic routes, sustainable modes of transport, physical/ environmental constraints, residential areas and other sensitive receptors	Section 7, Page 92

[69] the apportionment set out in draft London Plan 2019 (887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 & 929,750 by 2036)

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 3: Waste re-use, recycling and recovery To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery	➢ *Will the policy or proposal help to deliver a shift away from waste disposal towards practices towards the top of the government's waste hierarchy?* *(i) Prevention;* *(ii) Preparing for Re-Use;* *(iii) Recycling;* *(iv) Recovery;* *(v) Disposal.* 	➢ tonnage and proportion of south London's waste arisings respectively prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➢ number and proportion of waste developments achieving a shift away from waste disposal towards practices towards the top of the government's waste hierarchy ➢ tonnage and proportion of biodegradable or recyclable waste sent to landfill (tpa) (%) ➢ tonnage and proportion of household and C&I waste recycled (tpa) (%) ➢ tonnage and proportion of CD&E waste re-used, recycled or recovered (tpa) (%) ➢ proportion of excavation waste put to beneficial uses (%) ➢ performance against the following revised targets for re-use, recycling and recovery in the new London Plan - the equivalent of 100% of south London's waste is managed within the plan area by 2026 for all waste streams except excavation waste; - zero biodegradable or recyclable waste to landfill by 2026; - at least 65% recycling of municipal waste by 2030; - 95% reuse/recycling/recovery of construction and demolition waste; and - 95% beneficial use of excavation waste	Section 7, Page 93

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 4: Circular economy To promote a transition to a circular economy within south London	➢ *Will the policy or proposal promote the circular economy within south London?* ➢ *Will the policy or proposal improve efficiency and innovation to keep products and materials at their highest use for as long as possible?* ➢ *Will the policy or proposal support manufacturing from waste and the co-location of complementary uses in industrial areas e.g secondary material processing?* ➢ *Will the policy or proposal promote technologies that produce fuels that can be used to power waste management and industrial processes?*	➢ number and proportion of planning applications for waste management facilities supported by a Circular Economy Statement ➢ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➢ number and capacity of manufacturing from waste facilities developed within south London (tpa) ➢ number and capacity of waste facilities developed producing fuels that can be used to power waste management and industrial processes (tpa)	Section 7, Page 94
(B) CLIMATE CHANGE			
Objective 5: Climate Change Mitigation To address the causes of climate change by minimising CO_2 emissions from waste facilities	➢ *Will the policy or proposal minimise regulated and unregulated CO2 emissions from the operation of waste management facilities and ancillary buildings?* ➢ *Will the policy or proposal minimise embodied energy and the 'carbon footprint' associated with construction materials used for new or upgraded waste facilities?* ➢ *Will the policy or proposal promote technologies producing fuels that can be used to power waste management and industrial processes?*	➢ net carbon dioxide (CO_2) reductions delivered by waste management facilities and ancillary buildings (tpa) ➢ number and proportion of waste facilities (a) achieving BREEAM 'Excellent'; and (b) minimising embodied energy under the BRE's Building life cycle assessment' methodology ➢ number and proportion of waste facilities achieving an 'Excellent' rating under the BRE's 'CEQUAAL' accreditation scheme. ➢ number and capacity of waste management facilities producing fuels that can be used to power waste management and industrial processes?	Section 7, Page 94

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 6: Climate Change Adaptation To ensure that all waste management facilities are fully adapted to the impacts of climate change	➢ *Will the policy or proposal help to ensure that new or upgraded waste management facilities incorporate green infrastructure and maximise its benefits for flood risk management, urban cooling, resilience to drought, biodiversity and other climate adaptation objectives?*	➢ number and proportion of new or upgraded waste management facilities achieving the Mayor's minimum Urban Greening Factor (UGF)[70] score of 0.3 according to Policy G5 and Table 8.2 of the draft new London Plan. ➢ proportion of new or upgraded waste management facilities incorporating a green roof and achieving at least a 10% increase in green coverage compared to baseline conditions prior to development. ➢ number and proportion of new or upgraded waste management facilities complying with the Mayor's sustainable design and construction SPG as amended.	Section 7, Page 95
Objective 7: Flood risk and sustainable drainage (SuDS) To avoid, reduce and manage flood risk to or from waste management facilities	➢ *Will the policy or proposal help to avoid inappropriate development in flood risk areas?* ➢ *Will the policy or proposal ensure that the design and layout of the waste management sites preserves the ecological functioning of river corridors, enhance local amenity and avoid any net loss of floodplain storage?* ➢ *Will the policy or proposal minimise surface water run-off from new waste management facilities by incorporating sustainable urban drainage systems (SUDS), managing run-off as close to its source as possible and aiming to achieve greenfield run-off rates?*	➢ number and proportion of new or upgraded waste management facilities located within Environment Agency (EA) flood zones 2, 3a and 3b. ➢ number and proportion of new or upgraded waste management facilities located within areas at higher risk of surface water flooding according to the EA's 'Risk of Flooding from Surface Water (RoFSW)' map. ➢ number and proportion of new or upgraded waste management facilities incorporating SuDS measures. ➢ number and proportion of new or upgraded waste management facilities achieving greenfield run-off rates[71] ➢ number and proportion of new or upgraded waste management facilities incorporating flood resistance or resilience measures in line with Government guidance and EA Standing Advice.	Section 7, Page 95

[70] alternatively the London Borough of Sutton's green space factor (GSF) in Local Plan Policy 33 can be used i.e. 'the number and proportion of new or upgraded waste management facilities achieving an increased green space factor (GSF) score of 0.2

[71] for all flood events up to and including the 1 in 100 year event (including 35% for climate change)

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 8: Sustainable Design and Construction To promote the highest standards of sustainable design and construction in new waste management facilities	➢ *Will the policy or proposal help to promote the highest standards of sustainable design and construction in new waste management facilities*? ➢ *Will the policy or proposal help to minimise environmental life cycle impacts by requiring developers to conduct Life Cycle Assessments as part of the design process* ➢ *Will the policy or proposal promote the use of responsibly sourced construction materials*[72] *with lower environmental impact?*	➢ number and proportion of new or upgraded waste facilities achieving BREEAM 'Excellent'[73] ➢ number and proportion of waste facilities achieving an 'Excellent' rating under the BRE's 'CEQUAAL' scheme. ➢ number and proportion of new or upgraded waste management facilities subjected to Life Cycle Assessment as part of the design process? ➢ number and proportion of new or upgraded waste facilities promoting the use of responsibly sourced construction materials with lower environmental impact	Section 7, Page 96
(C) ENVIRONMENTAL QUALITY			
Objective 9: Transport To reduce trips, traffic congestion and pollution arising from waste-related transport movements	➢ *Will the policy or proposal help to minimise trips, traffic congestion and pollution arising from waste-related transport movements?* ➢ *Will the policy or proposal minimise the adverse impacts of waste-related transport movements on local roads by safeguarding and locating new waste management facilities close to the strategic road network?* ➢ *number of new or upgraded waste management facilities located in close proximity to sensitive receptors (i.e. within 400m).*	➢ *traffic flows on the strategic road network and local roads by vehicle type based on Department for Transport (DfT) and Transport for London (TfL) data (vehicle-km per annum)* ➢ *number of new or upgraded waste management facilities located in close proximity to the strategic road network (i.e. within 400m)* ➢ *number of new or upgraded waste management facilities located in close proximity to sensitive receptors (i.e. within 400m)* ➢ *number of waste sites intensified thus avoiding the need for new sites to developed and associated trips* ➢ *number and capacity of complementary uses introduced on waste sites, such as manufacturing from waste, with potential to enable 'linked trips'*	Section 7, Page 96

[72] for example through requiring submission of Environmental Product Declarations (EPD)
[73] the appropriate scheme is currently the BREEAM New Construction 2018

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 10: Air Quality To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	➢ *Will the policy or proposal contribute towards meeting national air quality objectives for nitrogen dioxide (NO2), particulates (PM10) and ozone and avoid any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'?* ➢ *Will the policy or proposal help to promote measures such as green infrastructure and screening, in order to prevent or minimise increased exposure to air pollution?*	➢ NO_2 (nitrogen dioxide) levels in µg/m^3 (Target: 200 µg/m^3 as a 1-hour mean no more than 18 days per year) ➢ PM10[74] levels in µg/m^3 (Target: 50 µg/m^3 as a 24-hr mean no more than 35 days/year; not to exceed 40 µg/m^3 as annual mean) ➢ ozone levels in µg/m^3 as an 8-hour mean (Target: No more than 100 µg/m^3 as an 8 hour mean > 10 x a year) ➢ number and proportion of new or upgraded waste management developments located within AQMAs or within Air Quality Focus Areas ➢ the number and proportion of new or upgraded waste management facilities achieving 'Air Quality Neutral' standards as defined by the Mayor[75]	Section 7, Page 97
Objective 11: Environmental protection To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases	➢ *Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities on noise pollution, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?* ➢ *Will the policy or proposal help to minimise water pollution from surface water runoff?* ➢ *Will the policy or proposal help to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment?*	➢ the number and proportion of new or upgraded waste management facilities located adjacent to residential uses and other sensitive land-uses ➢ the number and proportion of new or upgraded waste management facilities which are enclosed or screened ➢ new or upgraded waste facilities accompanied by Construction Environmental Management Plans ➢ the number of new or upgraded waste management facilities incorporating the principles of 'water sensitive urban design' as part of the site drainage/SuDS strategy ➢ the number and area of contaminated industrial sites remediated as a consequence of the development of new or upgraded waste management facilities (ha)	Section 7, Page 98

[74] PM10s = particulate matter less than 10 microns in size
[75] 'air quality neutral' standards are defined in the Mayor's supplementary planning guidance (SPG) on Sustainable design and Construction (GLA, 2014)

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 12: Biodiversity and Habitats To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive	➢ *Is the policy or proposal likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the EU Habitats Directive and the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?* ➢ *Will the policy or proposal help to minimise any potential impacts upon regionally or locally designated wildlife sites within the plan area?* ➢ *Will the policy or proposal ensure that there is no net loss in biodiversity value and incorporate opportunities to enhance biodiversity wherever possible as part of the development of new or upgraded waste management facilities?*	➢ modelled increase in air pollution arising from the operation of new and existing waste management facilities in south London, associated transport movements and potential adverse impacts on sensitive habitats or species on relevant European sites[76]: - Richmond Park SAC; - Wimbledon Common SAC; - Mole Gap to Reigate Escarpment SAC; and - Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA). ➢ the number of new or upgraded waste management facilities located within or adjacent to regionally or locally designated wildlife sites, including Sites of Interest for Nature Conservation (SINCs), local nature reserves (LNRs); and green corridors ➢ change in biodiversity value arising from the development of new or upgraded waste management facilities based on an appropriate metric such as the DEFRA biodiversity offsetting metric[77] ➢ change in priority habitats and population of Biodiversity Action Plan (BAP) species within each of the four boroughs	Section 7, Page 98

[76] the potential significance of any likely adverse effects on European sites arising from the new South London Waste Plan (SLWP) will be considered in the Habitats Regulations Assessment (HRA) Screening Report which will be produced for public consultation at the issues and options stage in October 2019

[77] further details of DEFRA's biodiversity offsetting metric is available on the GOV.UK website at https://www.gov.uk/government/collections/biodiversity-offsetting

SA Objective	Appraisal Questions	Indicators	Issue Ref
(D) ENVIRONMENTAL QUALITY			
Objective 13: Local Economy and Employment To promote local employment opportunities, and the competitiveness of the waste management sector within South London	➢ *Will the policy or proposal promote investment, local employment opportunities and the competitiveness of the waste management sector?* ➢ *Will the policy or proposal contribute to the growth of the circular economy within south London?* ➢ *Will the policy or proposal help to ensure that employment land supply matches projected demand over the plan period in each of the four partner boroughs and for the plan area as a whole?* ➢ *Will the policy or proposal help to maintain a sufficient supply of land and premises to meet current and future demands for industrial uses within the four south London boroughs and across the wider Wandle Valley Property Market Area* [78] ➢ *Will the policy or proposal help to that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?*	➢ number of people employed in the Circular Economy within south London and by borough ➢ number of green businesses by size and proportion surviving 1 year ➢ growth in the low carbon and environmental goods and services sector within south London ➢ projected supply and demand for employment land (for non waste-related uses) by borough over the plan period[79] ➢ vacancy rates within SILs and established industrial areas ➢ number of sites and total area of employment land within SILs and established industrial areas intensified for waste management and/or for other industrial uses ➢ area of employment land optimised for waste management and complementary manufacturing from waste uses ➢ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➢ number and capacity of manufacturing from waste facilities developed within south London (tpa)	Section 7, Page 99
Objective 14: Historic Environment, Townscape and Visual Amenity To avoid the adverse impacts of waste facilities on townscape quality and visual amenity by promoting high standards of design and layout	➢ *Will the policy or proposal avoid all potential adverse impacts on the quality and distinctiveness of south London's historic environment and cultural assets,* ➢ *Will the policy or proposal ensure that new or upgraded waste management facilities are built to high quality design principles that respect local character and do not adversely affect townscape?*	➢ the number and proportion of new or upgraded waste management facilities constructed to high quality design principles ➢ adverse impacts on the setting of scheduled monuments, historic parks and gardens and other heritage or cultural assets in south London	Section 7, Page 99

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 15: Human Health and Quality of Life To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment	➢ *Will the policy or proposal protect and enhance local amenity for residents living near new and existing waste management facilities, particularly within areas affected by social deprivation?* ➢ *Will the policy or proposal help to minimise the impacts of waste facilities and associated transport movements?* ➢ *Will the policy or proposal help to reduce the incidence of waste-related crime and contribute to public perceptions of safety?* ➢ *Will the policy or proposal maintain the current level of protection for Green Belt and Metropolitan Open Land (MOL) and public open space*	➢ levels of social deprivation in residential areas adjacent to waste management sites and the strategic road network within south London as measures by the Government's Index of Multiple Deprivation (IMD) and the relevant domains relating to employment, health, crime and living environment ➢ monitored levels of nitrogen dioxide (NO_2), particulates (PM10) and ozone against national air quality objectives ➢ levels of 'health and disability' deprivation in residential areas adjacent to waste management sites (see above) ➢ environmental crime rate per 1,000 population ➢ area of Green Belt, MOL and public open space and area lost to waste management development	Section 7, Page 100
Objective 16: Equalities, Accessibility and Social Inclusion To reduce exclusion, address inequalities & accessibility for all equalities target groups	➢ *Will the policy or proposal ensure that new waste management facilities are accessible and inclusive for all equalities target groups?* ➢ *Will the policy or proposal further promote social inclusion by addressing potential inequalities arising from current waste management arrangements in south London?* ➢ *Will the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?* ➢ *Will the policy or proposal maximize potential benefits to local communities in the form of new products and employment by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?*	➢ new or upgraded waste management facilities within south London are accessible and inclusive for all equalities target groups ➢ number and location of reuse and recycling centres within south London accepting household waste ➢ proportion of the urban area within south London within 2 km of reuse and recycling centres ➢ location and concentration of existing and new waste facilities relative to areas of relative social deprivation ➢ number of individuals, residents' groups, special interest groups, business organisations, public bodies and neighbouring waste planning authorities consulted as part of the preparation of the new plan	Section 7, Page 101

[78] the Wandle Valley Property Market Area includes Wandsworth as well as Croydon, Kingston,, Merton and Sutton
[79] based on the London Industrial Land Demand Study, prepared by CAG Consultants on behalf of the Mayor in 2017'

9. Identifying and Appraising Waste Sites

Review of existing waste management capacity[80]

9.1 As part of the evidence base for the new South London Waste Plan (SLWP), Anthesis consultants undertook an assessment of existing waste sites across the four boroughs in order to review what available waste management capacity may be considered to contribute towards the updated London Plan apportionment targets. Using the relevant apportionment criteria set out in the London Plan, the capacity review included the following types of waste management facility:

- **Used in London for energy recovery:** Energy recovery facility, energy from waste facility, anaerobic digestion;
- **Materials sorted or bulked in London facilities for reuse, reprocessing or recycling:** Materials Recycling Facility (MRF) or other materials sorting facility, transfer stations;
- **Material reused, recycled or reprocessed in London**: Material reprocessor, reuse facility, composting facility (permitted and exempt), anaerobic digestion facility; and
- **Produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition[81] as a minimum:** RDF or SRF production facilities (if Renewable Obligation Order requirements are met).

9.2 Existing waste transfer stations where collected wastes are bulked before transporting to other facilities, such as landfilling, energy recovery or separation for recycling were not counted towards the apportionment unless prior separation takes place.

9.3 Details of the review are set out in the South London Waste Technical Paper (Anthesis, 2019) in terms of:

- existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment;
- potential capacity gaps to 2036;
- waste management facilities in the planning pipeline;
- vacant sites which could be redeveloped for waste management uses; and
- opportunities for intensification.

9.4 The main conclusion reached by the consultants was that the waste sites identified as suitable for intensification and development represent sufficient opportunity to meet the capacity gaps for household, C&I and C&D waste streams. If all potential new capacity identified were to be brought forward, there would be surplus capacity for the management of household, C&I and C&D waste streams throughout the plan period to 2036. Although this surplus is forecast to decrease over the plan period, there is considered to be some flexibility in bringing the identified capacity forward. As sufficient opportunities can be identified to meet the capacity gap for household, C&I (apportioned waste) and C&D waste streams, it was therefore not considered necessary for the updated SLWP to identify any new areas for new waste facilities within the four boroughs.

[80] see also Section 3 of this SA Report

[81] refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns. The written contract must include the end-user's technical specifications.

Identifying sites for appraisal

9.5 Paragraph 4 of the NPPW states that:

> *"Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages."*

9.6 In addition, 2020 London Plan Policy SI 8 states that:

> *"Development Plan should identify the following as suitable locations to manage borough waste apportionments:*
> *(a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity;*
> *(b) Strategic Industrial Locations and Locally Significant Industrial Sites;*
> *(c) safeguarded wharves with an existing or future potential for waste and secondary material management."*

9.7 The sites included in the appraisal therefore consist of all of the existing waste treatment sites within the four Boroughs together with all of the Strategic Industrial Locations (SILs) and locally significant industrial locations (LSILs) across the plan area. It also includes Site C4: Days Aggregates site, which utilises the Purley railhead. The Chessington railhead has not been included as the operators have informed officers that the site will not be used for waste management purposes and so would fail the availability strand of the developability test (see below).

Initial site profiling (undertaken by Anthesis consultants)

9.8 As part of the evidence base, the consultants prepared initial site profiles for all existing waste management sites including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility, planning constraints and opportunities for intensification or upgrading existing operations. The results of initial site profiling undertaken by the consultants in early 2019 are set out Appendix 4 of the Technical Paper.

9.9 The following site assessment criteria and planning constraints can be directly related to one or more of the sustainability objectives making up the finalised SA Framework in Section 8: type of facility, throughput and licensed capacity:

- management type;
- access, congestion and road capacity;
- opportunity to use rail;
- cumulative impact of existing and proposed waste disposal facilities on community well-being;
- opportunity to intensify or upgrade;
- other designations;
- air quality focus area;
- green belt / MOL;
- flood risk;
- heritage assets; and
- proximity to environment designations

Site appraisal methodology

9.10 Following the preparation of the Technical Paper by Anthesis consultants, the four partner Boroughs carried out further detailed site appraisal work for all potential sites within the plan area in order to identify a range of suitable, developable waste sites for inclusion in the new SLWP. The methodology used was closely based on policy and guidance set out in the National Planning Policy Framework (NPPF), the National Planning Policy for Waste (NPPW) and the 2020 London Plan.

9.11 The NPPF's approach to site appraisal is based on the following three elements which determine whether a site is considered to be 'developable':

(i) suitability – the site is appropriate in terms of planning policy and associated designations;
(ii) availability – the site has no land ownership constraints;
(iii) viability – the site could be considered financial viable to develop.

Suitability

9.12 The suitability criteria used for the purpose of appraising potential waste sites are set out below in Table 9.1 together with the scoring system. These are derived from the criteria set out in Appendix B of the NPPW but incorporating amendments to reflect the context of the plan area.

9.13 Some of the potential waste sites are quite large and so are surrounded by a lot of different use and this creates a bias against large sites where proximity criteria are involved. Consequently, large sites are only marked down for proximity or being adjacent to sensitive receptors where the land use has a significant boundary with the site

9.14 The maximum suitability score for any particular site is 50.

Table 9.1 Site Suitability Criteria and Scoring

Suitability Criterion Used	Scoring Systrem	Relevant NPPF Definition
Water quality (SPZ)	5 - Not in SPZ[82] or in SPZ3 3 - In SPZ2 1 - In SPZ1	(1) water quality
Flood risk management (Flood)	5 - Flood Zone 1 3 - Flood Zone 2 1- Flood Zone 3	(aii) flood risk management
Metropolitan Open Land and Green Belt (MOL/GB)	5 - Not adjacent to MOL/Green Belt 3 - Adjacent to MOL/Green Belt 1 - In MOL/Green Belt	(c) visual impacts
Site of Interest for Nature Conservation (SINC)	5 - Not adjacent to a SINC 3 - Adjacent to a SINC 1 - Within a SINC	(d) nature conservation
Conservation Area or Scheduled Ancient Monument (CA/SAM)	5 - Not adjacent to a CA or SAM 3 - Adjacent to a CA or SAM 1 - Within a CA	(e) historic environment
Strategic Road Network (SRN)	5 - Direct access to Strategic Road Network 3 - Access to Strategic Road Network without going through residential areas 1 - Access to Strategic Road Network going through residential areas	(f) traffic and access
Sustainable Transport (Sus Trans)	5 - Access to a sustainable transport network 1 - No access to sustainable transport network	(fii) traffic and access
Sensitive Receptors (Sens Rec)	15 - Not adjacent to sensitive receptors (residential, schools, hospitals) 7 - Adjacent to sensitive receptors (residential, schools, hospitals)	(g) air emissions (h) odours (i) vermin and birds; (j) noise, light & vibration; (k) litter (l) land use conflict
SUITABILITY SCORE MAXIMUM	**50**	

[82] Source Protection Zone

Availability and Viability

9.15 The scoring system used for appraising site availability and viability is set out below in Table 9.2. The maximum respectives scores for each of these criteria is 25, making 50 in total.

9.16 An existing operational waste site scores highly because its very existence is considered to provide availability and viability. Large industrial areas which already include existing waste facilities score more highly than those which do not include existing waste facilities. The rationale for this is to reflect the fact that industrial land values vary across the plan area and those estates which are lower in value tend to have waste facilities which are more marginal in terms of profitability. This is considered to be a more reliable indicator of viability and availability than a notional viability assessments.

Table 9.2 Site Availability and Viability Criteria

Suitability Criterion Used	Scoring System
Availability	25 - Existing site 15 - Existing sites within or nearby 5 - No existing sites within or nearby
AVAILABILITY SCORE MAXIMUM	25
Viability	25 - Existing site 15 - Existing sites within or nearby 5 - No existing site within or nearby
VIABILITY SCORE MAXIMUM	25
Total combined score	**50**

Overall site appraisal score

9.17 For each site appraised, a total score out of 100 was obtained by adding the sub-totals for site suitability (50), availability (25) and viability (25).

Results of site appraisal

9.18 The results of appraisal for all potential waste sites considered throughout the plan review process are set out in Table 9.3 below. Existing waste management sites within south London which are proposed to be carried forward and safeguarded in the draft SLWP (Submission Version) are shaded in green.

9.19 The results indicate that these sites are the most developable sites across the plan area since they score highly not only in terms of not only availability and viability, but also in terms of suitability. Furthermore, they score highly even though the site appraisal gives less weight to availability and viability and that the site appraisal does not take into account any mitigation measures for suitability that may have imposed by way of conditions when the existing sites were granted planning permission.

Table 9.3 Results of Site Appraisal

SITE	Type	Area (ha)	SPZ	Flood	MOL/ GB	SINC	CA/ SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Availa-bility	Viab-ility	TOTAL SCORE	Notes
CROYDON SITES															
C1:Able Waste Services	Existing	0.45	1	5	3	3	5	3	1	15	36	25	25	86	Proposed
C4:Days Aggregates	Existing	2.0	1	5	5	5	5	3	5	7	36	25	25	86	Proposed
C5A:Factory Lane Trans Station	Existing	1.4	5	3	5	5	5	3	1	15	42	25	25	92	Proposed
C5B:Factory Lane R&R Centre	Existing	0.3	5	3	5	5	5	3	1	15	42	25	25	92	Proposed
C6:Fishers Farm R&R Centre	Existing	0.2	3	5	3	3	5	1	1	7	28	25	25	78	Proposed
C7:Henry Woods Waste Mgmt	Existing	0.7	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
C8:New Era Metals	Existing	0.4	1	5	5	5	5	5	1	15	42	25	25	92	Proposed
C9:Pear Tree Farm	Existing	1.8	1	5	1	3	5	1	1	15	32	25	25	82	Proposed
C10:Purley Oaks R&R Centre	Existing	0.2	1	1	5	5	5	5	1	7	30	25	25	80	Proposed
C11:SafetyKleen	Existing	0.3	1	5	5	3	5	5	1	15	40	25	25	90	Proposed
C12:Stubbs Mead Depot	Existing	2.7	5	3	5	3	5	5	1	15	42	25	25	92	Proposed
C13: Solo Wood Recycling	Existing	0.1	5	3	5	5	5	3	1	15	42	25	25	92	Proposed[83]
C2:Croydon Car Spares	Existing	0.05	5	5	3	3	5	1	1	7	30	5	5	40	Site deleted following I&POs
C3:Curley Skip Hire	Existing	0.05	5	5	5	5	5	1	1	7	34	5	5	44	Site deleted following I&POs
Marlpit Lane	SIL	20	1	5	5	1	5	5	5	15	42	15	15	72	Site excluded
Purley Way North (3 parts)	SIL	71.4	5	3	5	5	5	5	1	15	44	5	5	54	Site excluded
Purley Way South (2 parts)	SIL	33.3.	1	5	3	3	5	5	1	15	38	15	15	68	Site excluded
Gloucester Road East	LSIL	2.6	5	5	5	3	5	1	5	15	44	5	5	54	Site excluded
Gloucester Road West	LSIL	1.5	5	5	5	5	5	1	5	7	38	5	5	48	Site excluded
Selsdon Road (two parts)	LSIL	6.7	5	5	5	3	5	1	5	7	36	5	5	46	Site excluded
Thornton Road	LSIL	4.7	5	5	5	5	5	5	1	7	38	5	5	48	Site excluded
Union Road	LSIL	3.3	5	5	5	5	5	5	1	7	38	5	5	48	Site excluded
Vulcan Way	LSIL	9.1	3	5	3	3	5	1	1	7	28	5	5	38	Site excluded

[83] site introduced following the issues and preferred options stage

SITE	Type	Area (ha)	SPZ	Flood	MOL/ GB	SINC	CA/ SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Availa-bility	Viab-ility	TOTAL SCORE	Notes
KINGSTON SITES															
K2: Genuine Solutions	Existing	0.3	5	5	5	5	5	5	1	15	46	25	25	96	Proposed
K3: Kingston R&R Centre	Existing	0.4	5	5	3	3	5	1	1	15	38	25	25	88	Proposed
K4: Kingston Waste Transfer Station	Existing	1.6	5	5	3	3	5	1	1	15	38	25	25	88	Proposed
K1: Chessington Equestrian Centre	Existing	9.9	5	5	1	5	5	5	1	15	42	5	5	52	Site deleted[84] following I&POs
Barwell Business Park	SIL	-	5	5	3	5	5	5	5	15	48	5	5	58	Site excluded
Chessington Industrial Estate	SIL	-	5	5	3	3	5	3	5	7	36	15	15	66	Site excluded
Cambridge Road/Hampden Road	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
Canbury Park	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
Fairfield Trade Pk/ Kingsmill Bus Pk	LSIL	-	5	3	5	3	5	1	1	7	30	15	15	60	Site excluded
London Road	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
Red Lion Industrial Estate	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
St George's Industrial Estate	LSIL	-	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
St John's Industrial Estate	LSIL	-	5	5	5	5	5	1	5	7	38	5	5	48	Site excluded
Silverglade Business Park	LSIL	-	5	5	1	5	5	5	1	7	34	5	5	44	Site excluded
MERTON SITES															
M1: B&T@Work	Existing	0.06	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
M2: European Metal Recycling	Existing	1.0	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
M3: Deadman Confidential	Existing	0.4	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
M4: Garth Road R&R Centre	Existing	0.7	3	5	5	5	5	1	5	7	36	25	25	86	Proposed
M5: Garth Road Transfer Stat	Existing	0.45	3	5	5	5	5	1	5	7	36	25	25	86	Proposed
M6: George Killoughery Ltd	Existing	0.8	1	3	3	3	3	3	1	15	32	25	25	82	Proposed
M7: LMD (Abbey Ind Est)	Existing	0.06	5	5	5	5	5	3	1	15	44	25	25	94	Proposed

[84] this site has has been deleted following the issues and preferred options stage since it is in temporary use

SITE	Type	Area (ha)	SPZ	Flood	MOL/ GB	SINC	CA/ SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Availa-bility	Viab-ility	TOTAL SCORE	Notes
M8: LMD Waste (Willow Lane)	Existing	0.07	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
M9: Maguire Skips	Existing	0.2	5	5	5	3	5	3	1	7	34	25	25	84	Proposed
M10: Powerday	Existing	0.3	5	3	3	3	5	3	5	15	42	25	25	92	Proposed
M11: Morden Transfer Station	Existing	0.8	3	5	3	5	5	1	5	7	34	25	25	84	Proposed
M12: NJB Recycling	Existing	0.3	5	5	3	3	5	3	5	7	36	25	25	86	Proposed
M13: One Waste Clearance	Existing	0.1	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
M14: Reston Waste	Existing	0.43	5	5	3	3	5	3	5	7	36	25	25	86	Proposed
M15: Riverside AD Facility	Existing	0.5	1	3	3	3	3	3	1	15	32	25	25	82	Proposed
M16: Riverside Bio-Treatment	Existing	0.4	1	3	3	3	3	3	1	15	32	25	25	82	Proposed
M17: UK & European (Ranns)	Existing	0.5	1	3	5	5	5	3	1	15	38	25	25	88	Proposed
M18: Wandle Waste Man	Existing	0.07	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
Durnsford Road B	SIL	18.5	5	5	3	3	5	5	5	7	38	15	15	68	Site excluded
Hallowfield Way	SIL	7.9	5	5	5	3	3	5	5	7	38	5	5	48	Site excluded
Plough Road	SIL	13.8	5	1	3	3	1	3	5	7	28	15	15	58	Site excluded
Prince George's Road	SIL	6.2	1	3	5	3	5	5	5	7	34	5	5	44	Site excluded
Sth Wimbledon Bus Pk (Morden Rd)	SIL	31.7	3	5	3	3	3	5	5	7	34	5	5	44	Site excluded
Willow Lane	SIL	41.3	1	3	3	3	3	1	5	7	28	15	15	58	Site excluded
Bushey Road	LSIL	3.7	5	5	5	5	5	5	5	7	42	5	5	52	Site excluded
Burlington Way (Beverley Way)	LSIL	7.3	5	3	3	3	5	5	5	7	36	5	5	46	Site excluded
Malden Way (Beverley Way)	LSIL	0.7	5	3	5	3	5	1	5	7	34	5	5	44	Site excluded
Dundonald Road	LSIL	3.7	5	5	5	3	5	1	5	7	36	5	5	46	Site excluded
Durnsford Road A	LSIL	2.4	5	5	5	3	5	5	5	7	40	5	5	50	Site excluded
Gap Road	LSIL	3.8	5	5	5	3	5	3	5	7	38	5	5	48	Site excluded
Garth Road	LSIL	9.4	5	5	5	3	5	1	1	7	32	15	15	62	Site excluded
Nelson Trading Estate	LSIL	2.3	5	3	5	3	5	5	5	7	38	5	5	48	Site excluded
Rainbow Ind Estate (Raynes P)	LSIL	3.2	5	5	5	1	5	1	5	7	34	5	5	44	Site excluded
Streatham Road	LSIL	5.3	5	3	5	5	5	5	5	7	40	5	5	50	Site excluded

SITE	Type	Area (ha)	SPZ	Flood	MOL/ GB	SINC	CA/ SAM	SRN	Sus Trans	Sens Rec	Suitability Total	Availa-bility	Viab-ility	TOTAL SCORE	Notes
SUTTON SITES															
S1: 777 Recycling Centre	Existing	1.0	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S2:Beddington Farmlands ERF	Existing	5.8	5	5	1	1	5	1	1	15	34	25	25	84	Proposed
S3: Cannon Hygiene	Existing	0.2	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S4: Croydon Transfer Station	Existing	0.7	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S5: Hinton Skips	Existing	0.6	5	3	5	5	5	1	1	15	40	25	25	90	Proposed
S6: Hydro Cleaning	Existing	0.2	5	5	5	5	5	3	1	15	44	25	25	94	Proposed
S7: Kimpton R&R Centre	Existing	0.4	5	5	3	5	5	5	1	15	44	25	25	94	Proposed
S8: King Concrete	Existing	0.5	5	5	3	3	5	1	1	7	30	25	25	80	Proposed
S9: Premier Skip Hire	Existing	0.1	5	5	5	5	5	5	1	15	46	25	25	96	Proposed
S10: Raven Recycling	Existing	0.3	5	5	5	5	5	1	1	15	42	25	25	92	Proposed
S11: TGM Environmental	Existing	0.2	5	3	5	5	5	1	1	15	40	25	25	90	Proposed
S12: Beddington Lane Recovery	Existing	2.8	5	5	3	1	5	1	1	15	36	25	25	86	Proposed[85]
Beddington Industrial Estate	SIL	105.8	5	3	3	3	3	1	1	7	26	15	15	56	Site excluded
Imperial Way Industrial Estate	SIL	18.8	1	5	3	5	5	5	1	15	40	5	5	50	Site excluded
Kimpton Way Industrial Estate	SIL	5.9	5	5	3	3	5	5	1	7	34	15	15	64	Site excluded
Croydon Industrial Area	LSIL	0.9	5	5	5	5	5	5	1	7	38	5	5	48	Site excluded
Gander Green Lane/Abbotts Rd	LSIL	0.7	3	5	5	5	5	5	1	7	36	5	5	46	Site excluded
Hackbridge Industrial Area	LSIL	1.3	1	3	5	5	5	1	5	7	32	5	5	42	Site excluded
Oldfields Way Industrial Area	LSIL	0.6	5	3	5	3	5	1	1	7	30	5	5	40	Site excluded
Plumpton Way Industrial Area	LSIL	1.1	5	5	5	5	5	1	1	7	34	5	5	44	Site excluded
Restmor Way Industrial Area	LSIL	3.4	1	3	5	3	5	1	5	7	30	5	5	40	Site excluded
Wandle Valley Trading Estate	LSIL	0.3	1	1	5	3	5	3	1	7	26	5	5	36	Site excluded

[85] site introduced following the issues and preferred options stage

Industrial areas previously identified as suitable for waste facilities but not proposed to be carried forward

9.20 Industrial areas previously identified as 'broad areas' suitable for waste management uses in Schedule 2 of the current SLWP (2012) are listed below in Table 9.4.

Table 9.4: Industrial areas previously identified as suitable but not carried forward

SLWP Ref	Industrial Area	Significant changes since 2012
CROYDON/SUTTON		
102	Purley Way, Lysander Road and Imperial Way Ind. Area	n/a
CROYDON		
99	Purley Oaks Highways Depot	This area has been allocated as a Gypsy and Traveller site. Therefore, it is no longer suitable for new waste facilities
105	Factory Lane Industrial Estate	3.33ha of land within this area has been designated for redevelopment (Proposal Sites 430 and 946). Therefore the area suitable for waste facilities will reduce in size
125	Factory Lane (South Side)	n/a
KINGSTON		
	Chessington Industrial Area	n/a
MERTON		
	Durnsford Road Industrial Area	This area has had office buildings converted to residential accommodation under Prior Approval (Vantage House, Weir Road). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of the south of the area for new waste uses. Durnsford Road was identified in the Crossrail 2 consultation in 2015 as the 'proposed site for stabling, depot, shaft and tunnelling works', however Crossrail 2 works are likely to begin beyond the plan period for the new SLWP
	Garth Road Industrial Area	This area has had office buildings converted to residential uses under Prior Approval (Enterprise House). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of parts of the Area for waste uses
	Willow Lane Industrial Area	This area has had office buildings converted to residential accommodation under Prior Approval (Connect House). The Area is now subject to an Article 4 direction which has removed the permitted development rights, however the residential accommodation already in the middle of the Area will affect the suitability of parts of the Area for waste uses. Willow Lane is a Business Improvement District and is currently subject to a BID vote
SUTTON		
	Beddington Ind Area (part)	n/a
	Kimpton Industrial Estate (part)	Land north of Minden Road has been redeveloped for other uses. Therefore, it is no longer suitable for new waste facilities
	Wandle Valley Trading Estate (part)	This area has been redeveloped for other uses and it is an is an integral part of the Wandle Valley Trail. Therefore, it is no longer suitable for new waste facilities

Sustainability appraisal of potential waste sites

9.21 In addition to the above site appraisal work, the potential impacts of each of the existing or potential waste management sites considered throughout the plan review process has been appraised, where relevant, against each of the sustainability objectives making up the finalised SA Framework out in Section 8 of this document. It should be noted that there is a significant overlap between (i) the consultants' initial site assessment criteria and the criteria developed by the four Boroughs for the purpose of assessing site suitability, availability and deliverability; and (ii) the sustainability objectives making up the SA Framework.

9.22 The appraisal results for each of the sites are set out in Section 12.

9.23 In interpreting the outcome of site appraisal it should be noted that:

- for existing waste management sites which are already in operation, it can be assumed that any potential adverse impacts upon the local environment and neighbouring land-uses (arising from both construction and operation) should have been mitigated already at least some extent as part of the planning permission;
- those existing waste management sites which have potential for intensification or redevelopment intrinsically offer additional opportunities for avoiding or minimising adverse effects on upon the local environment and neighbouring land-uses;
- a number of the sustainability criteria within the SA Framework (e.g. 'sustainable design and construction') cannot meaningfully be assessed in relation to specific sites, since the nature and extent of the potential impact will be determined by the effective implementation of the relevant development management policies rather than the location or any other intrinsic characteristic of the site. This is indicated in the matrix through a through a 'neutral' rating.

10. Developing Proposed South London Waste Plan Policies (Task A5)

Developing draft policies for inclusion in the Issues and Preferred Options document (Regulation 18 consultation)

10.1 Based on initial evidence gathering on existing and future waste management capacity in South London against the new London Plan apportionment, specific policy recommendations contained in the Technical Paper (Anthesis, June 2019) and the outcome of the sustainability appraisal (SA) scoping stage, the following draft polices (WP1-WP8) were developed by the partner boroughs as part of the preferred SLWP option to guide proposed waste developments over the plan period from 2021 to 2036:

- Draft Policy WP1: Strategic Approach to Municipal Solid Waste and C&I Waste;
- Draft Policy WP2: Strategic Approach to Other Forms of Waste;
- Draft Policy WP3: Existing Waste Sites;
- Draft Policy WP4: Sites for Compensatory Provision;
- Draft Policy WP5: Protecting and Enhancing Amenity;
- Draft Policy WP6: Sustainable Design and Construction of Waste Facilities;
- Draft Policy WP7: The Benefits of Waste;
- Draft Policy WP8: Planning Obligations.

10.2 The above policies were subsequently put forward in the SLWP Issues and Preferred Options document which was published for public consultation between 31 October and 22 December 2019. The accompanying SA Report concluded that draft Policies WP1-WP8 -which represented the partner boroughs' 'preferred' strategy for the new SLWP (Option 1) – would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

Developing proposed policies for inclusion in the draft SLWP for submission (Regulation 19 consultation)

10.3 At the close of consultation period, a total of 1,155 representations[86] had been received from 78 individual consultees. Some of the key waste planning and sustainability issues arising from public consultation are discussed in Section 7 of this SA Report on 'Key Sustainability Issues'.

10.4 A draft version of the SLWP 2021-36 (the draft plan) has now been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public. While the overall strategic approach to managing South London's future waste arisings to 2036 is essentially unchanged, the draft plan incorporates a number of changes to the waste policies put forward at the issues and preferred options stage in the light of representations received and changing circumstances.

[86] a complete list of representations to the SLWP Issues and Preferred document and to accompanying SA Report together with officer comments are available in the South London Waste Plan Examination Library

10.5 The draft plan, which has been published for further public consultation between 4 September and 22 October (Regulation 19 consultation), now identifies the following 10 strategic and development management policies to guide waste treatment within the four boroughs over the next 15 years.

Strategic Policies

- **WP1 Strategic Approach to Household and Commercial and Industrial Waste:** The policy title has been changed to refer to 'household' waste in place of 'Municipal Solid Waste'; and
- **WP2 Strategic Approach to Other Forms of Waste**: This policy has been amended to reflect the move from a shortfall in C&D waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of Surrey County Council (see Representation C18/144) amongst other South East councils.

Development Management Policies

- **WP3 Existing Waste Sites** (unchanged);
- **WP4 Sites for Compensatory Provision** (unchanged);
- **WP5 Protecting and Enhancing Amenity** (unchanged);
- **WP6 Sustainable Design and Construction of Waste Facilities**: This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that, where appropriate, the sustainability credentials of a waste development can been measured against the BRE's 'CEQUAAL'[87] scheme in place of the BREAAM New Construction scheme;
- **WP7 The Benefits of Waste** (unchanged);
- **WP8 New Development Affecting Waste Sites**: This is a new policy to reflect the requests from SUEZ (see Representation C20/10) and Veolia (see Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy:
- **WP9 Planning Obligations** (unchanged);
- **WP10 Monitoring and Contingencies:** This is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies

10.6 The basis for introducing the above changes can be seen in the consultee comments and the relevant officer responses set out in the Schedule of Representations on the Issues and Preferred Options document.

Strategic alternatives for the purpose of appraisal

10.7 The strategic alternatives previously identified at the issues and options stage have been largely carried forward for the purpose of appaising the proposed policies included in the draft Plan.

- **Option 1: Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP submission version (see above);
- **Option 2: Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged; and
- **Option 3¨Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

[87] the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at https://www.ceequal.com/

10.8 Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and SWP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036:

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged.
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the current SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

10.9 In considering the impacts of Option 1 (Proposed Plan), the potential sustainability benefits of the newly introduced policies (WP8 and WP10) and the significant changes made to Policies WP2 and WP6 have also been assessed in relation to the draft policies put forward at the issues and preferred options stage.

10.10 While in many respects proposed Policies WP1-WP10 (Option 1) carry forward and build upon the policies in the existing plan, there are number of important differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation. As can be seen from the results of the appraisal, these are likely to have significant beneficial impacts by comparison with the existing plan.

10.11 Further details of the proposed policies and strategic alternatives (Options 1-3) are set out below.

Policy WP1: Strategic approach to Household and C&I waste

OPTION 1: PROPOSED PLAN - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT) (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036. (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3). (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).
OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT) Carry forward Policy WP1 from existing SLWP 2012
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP1 to expire in 2021

Policy WP2: Strategic approach to other forms of waste

OPTION 1: PROPOSED PLAN - SAFEGUARD EXISTING SITES ONLY

(a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effectivemanagement eliminating the need for additional waste capacity.

(b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for Construction and Demolition waste of managing 420,275 tonnes per annum within their boundariesacross the plan period to 2036. The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouragingthe intensification of these sites as appropriate (see Policy WP3).

(c) Temporary sites for the deposit of Excavation Waste will be supportedwhere they are for beneficial use and subject to Policy WP5.

(d) New sites (either transfer or management) will not be supported forRadioactive Waste, Agricultural Waste and Hazardous Waste.

(e) Development for improvements to the operation of and the enhancement ofthe environment of the Hogsmill STW and the Beddington STW will be supported, subject to the other policies inthis South London Waste Plan and the relevant borough's Development Plan.

OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS

Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.

OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES

Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.

OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP2 to expire in 2021

Policy WP3: Existing waste sites

OPTION 1: PROPOSED PLAN- POLICY WP3

Safeguarding

(a) The sites set out on Pages 44-91 of this South London Waste Planwill be safeguarded for waste uses or waste/mineral uses only.

Intensification

(b) The intensification of use of a safeguarded waste site, measured by theincrease of tonnes of waste managed per annum, will be supported, subject tothe other policies in this South London Waste Plan and the relevant borough'sDevelopment Plan.

Safeguarding Compensatory Provision

(c) Compensatory provision for the loss of an existing safeguarded waste site willbe required with the level of compensatory provision necessary to beconsidered on a case-by-case basis. The list of safeguarded sites will beupdated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.

(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.

Safeguarding Waste Hierarchy

(e) Any development on an existing safeguarded waste site will be required toresult in waste being managed at least to the same level in the waste hierarchyas prior to the development.

OPTION 2: EXISTING PLAN Carry forward Policies WP3 & WP4 from existing SLWP 2012.
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policies WP3 and WP4 to expire in 2021.

Policy WP4: Sites for compensatory provision

OPTION 1: PROPOSED PLAN - POLICY WP4 Proposals for new waste sites to provide compensatory provision should: (a) Demonstrate that the site is capable of providing sufficient compensatory capacity. (b) Be located on sites: (i) within Strategic Industrial Locations or Locally Significant Industrial Locations; (ii) not having an adverse effect on nature conservation areas protected by international or national regulations; (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,(iv)not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b. (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area; (d) Have particular regard to sites which: (i) do not result in visually detrimental development conspicuous from strategic open land (e.g. Green Belt or Metropolitan Open Land); (ii) are located more than 100 metres from open space; (iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources); (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk; (v) have direct access to the strategic road network; (vi) have no Public Rights of Way crossing the site; (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views; (viii) offer opportunities to accommodate various related facilities on a single site; (e) Include appropriate mitigation measures which will be considered in assessing site suitability. (f) Meet the other policies of the relevant borough's Development Plan.
OPTION 2: EXISTING PLAN Carry forward Policy WP5 from existing SLWP 2012
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP5 to expire in 2021

Policy WP5: Protecting and enhancing amenity

OPTION 1: PROPOSED PLAN - POLICY WP5

(a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.

(b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.

(c) Particular regard will be paid to the impact of the development in terms of:

(i) The Green Belt, Metropolitan Open Land, recreation land or similar;
(ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
(iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
(iv) Groundwater, surface water and watercourses;
(v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;
(vi) Noise and vibration from the plant and traffic generated;
(vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;
(viii) The safety and security of the site
(ix) Odour, litter, vermin and birds; and,
(x) The design of the waste facility, particularly:

- complementing or improving the character of an area;
- limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
- being of a scale, massing or height appropriate to the townscape or landscape;
- using good quality materials;
- minimising the requirement for exterior lighting; and,
- utilising high-quality boundary treatments.

The information in the schedule below will provide the basis for the assessment of the impact of a development.

OPTION 2: EXISTING PLAN

Carry forward Policy WP7 from SLWP 2012

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP7 to expire in 2021

Policy WP6: Sustainable design and construction of waste facilities

OPTION 1: PROPOSED PLAN - POLICY WP6

(a) Waste development must achieve asustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptablewhere the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies ofthe relevant borough"s Development Plan.

(b) Waste facilities will be required to:

(i) minimise on-site carbon dioxide emissions in line with 2020 London Plan PolicySI2;

(ii) be fully adapted and resilient to thefuture impacts of climate change in accordancewith 2020 London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;

(iii) incorporate green roofs, sustainabledrainage systems (SuDS) including rainwater harvesting and other blue and greeninfrastructure measures as appropriate in accordance with 2020 London Plan Policy G5;

(iv) make a more efficient use of resourcesand reduce the lifecycle impacts of construction materials;

(v) minimise waste and promote sustainable management of construction waste on site; and,

(vi) protect, manage and enhance local habitats and biodiversity.

OPTION 2: EXISTING PLAN

Carry forward Policy WP6 from SLWP 2012

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP6 to expire in 2021

Policy WP7: The benefits of waste

OPTION 1: PROPOSED PLAN - POLICY WP7

(a) Waste development for the intensification of sites,which involve the reuse, refurbishment,remanufacture of products or the production of by-products, will be encouraged.

(b) Waste development for additional Energy fromWaste facilities will not be supported

(c) Waste development for the intensification of sitesshould seek to result in sub-regional job creation and resulting social benefits, including skills, training, andapprenticeship opportunities.

OPTION 2: EXISTING PLAN

Carry forward Policy WP8 from SLWP 2012.

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP8 to expire in 2021.

Policy WP8: New Development affecting waste sites (NEW POLICY)

OPTION 1: PROPOSED PLAN - POLICY WP8

(a) New development should be designed to ensurethat existing waste sites and sites developed for compensatory provision remain viable and canintensify without unreasonable restrictions being placed on them.

(b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, theapplicant should:

(i) Ensure that good design mitigates andminimizes existing and potential nuisancesgenerated by the waste use, either existing,extant, a permission for additional capacity or developed for compensatory provision.

(ii) Explore mitigation measures early in thedesign stage, with the necessary and appropriate provisions, including the ongoingand future management of mitigation measures, secured through planningconditions and obligations..

OPTION 2: EXISTING PLAN

Not applicable.

OPTION 3: 'DO-NOTHING' SCENARIO

Do not include NEW POLICY W8 in the draft SLWP for submission.

Policy WP9: Planning obligations

OPTION 1: PREFERRED POLICY

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.

OPTION 2: EXISTING PLAN

Carry forward Policy WP9 from SLWP 2012.

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP9 to expire in 2021.

Policy WP10: Monitoring and contingencies (NEW POLICY)

OPTION 1: PROPOSED PLAN - POLICY WP8

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton"s Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.

OPTION 2: EXISTING PLAN

Not applicable.

OPTION 3: 'DO-NOTHING' SCENARIO

Do not include NEW POLICY W10 in the draft SLWP for submission.

11. Compatibility of the Vision and Objectives against the SA Framework Objectives (Task B1)

Background

11.1 Government guidance emphasises the importance of compatibility analysis as part of the appraisal process as a way of ensuring that emerging plan objectives are fully compatible and actively contribute towards each of the sustainability objectives in the SA Framework (Section 8). Compatibility analysis can also be used to highlight those areas of planning policy that might be in conflict with overarching sustainability objectives in the absence of appropriate mitigation measures.

Proposed Vision

11.2 The draft South London Waste Plan (SLWP) for submission sets out the following proposed Vision.

PROPOSED VISION

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met.

The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates..

Proposed objectives

11.3 The above Vision is supported by the following proposed objectives.

PROPOSED OBJECTIVES

(1) **Meet the 2020 London Plan target for Household and Commercial and Industrial Waste.**

(2) **Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary.**

(3) **Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan.**

(4) **Ensure there is sufficient land for other industrial uses within the South London Waste Plan aea's industrial estates.**

(5) **Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.**

(6) **Ensure the effects of new development are mitigated and, where possible, enhance amenity.**

Compatibility analysis

11.4 The Compatibility Matrix in Table 11.1 presents the outcome of testing the proposed Vision and the six objectives against the 16 SA Framework objectives.

Table 11.1: Compatibility Matrix

KEY	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
√√ Compatible & Synergistic √ Compatible objectives X Incompatible ? Potential Conflict ☐ No interaction	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste–related HGV movement	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse effects on human health and protect the open environmnt	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
PROPOSED VISION																
By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met. **The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates**	√√	√√	√	√	√	√	√	√√	√√	√√	√	√	√√	√	√√	√√
PROPOSED OBJECTIVES																
Meet the 2020 London Plan target for Household and Commercial and Industrial Waste.	√√	√√	√√	√					√	√	√		√		√	√
Meet the identified needs for C&D Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary	√√	√√	√√	√√	√√	√√	√√	√	√	√	√√	√	√	√	√	√
Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan	√√	√√	√	√	√				√√	√√	√	√	√√	√	√√	√√
Ensure there is sufficient land for other industrial uses within the South London Waste Plan aea's industrial estates.		√√									√		√√	√	√	√√
Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.		√	√	√	√√	√√	√√	√√	√	√√	√√	√√	√	√√	√√	√√
Ensure the effects of new development are mitigated and, where possible, enhance amenity		√	√	√	√√	√√	√√	√√	√	√√	√√	√√	√	√√	√√	√√

12. Appraisal of Proposed Policies and Sites (Tasks B3, B4 and B5)

Appraisal Methodology

12.1 The SA Matrix in Table 12.1 sets out the results of appraisal for each of the proposed waste policies (WP1-WP10) set out in the draft SLWP for submisission (Part A) and for all of the sites proposed to be safeguarded for waste uses (C1-C12, K2-K4, M1-M18 and S1-S12) (Part B).

12.2 As discussed in Section 10, three strategic alternatives have been identified for the management of South London's waste over the next 15 years from 2021 to 2036. **Option 1 Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP for submission. **Option 2 Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged. **Option 3 'Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

12.3 New policies and significant changes to the proposed policies which have been introduced since the issues and preferred options stage in response to consultation comments or updated evidence are indicated through underlined text. However, Option 1 (Proposed Plan) essentially carries forward the preferred strategy which was subject to appraisal in the previous SA Report[87].

12.4 Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and WP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036. **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged. **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

12.5 Part B of the SA matrix draws substantially upon the initial site profiling work undertaken by Anthesis consultants together with the subsequent detailed site appraisal work undertaken by the four boroughs to evaluate the suitability, availability and deliverability of each site (see Section 9).

12.6 It should be noted that for existing waste sites which are already in operation and complying with both their planning permissions and waste management licenses, it has been assumed that any potential adverse impacts upon the local environment and neighbouring land-uses (from construction and operation) should have been mitigated already at least some extent as part of the permission.

[87] the preferred SLWP policies put forward at the issues and preferred options stage and draft Policies WP1-WP10 have been treated as a single strategic option (i.e. Option 1) for the purpose of the appraisal. However any further sustainability benefits arising from the two new policies and additional wording have been reflected in the matrix scoring and associated commentary

12.7 The scoring system used to indicate the nature and magnitude of impacts is set out in Figure 12.1 below.

Figure 12.1: Scoring system for use in the appraisal

Symbol	Scale of effect
+++	Large beneficial impacts
++	Medium beneficial impacts
+	Smaller beneficial impact
-	Neutral or no impact
x	Smaller negative impact
xx	Large negative effect.
?	Uncertain impact or the nature and magnitude of the impact is subject to the implementation of other policies in the plan.

SUSTAINABILITY APPRAISAL MATRIX

Part A: Proposed Policies

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standar of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP1: STRATEGIC APPROACH TO HOUSEHOLD WASTE AND COMMERCIAL AND INDUSTRIAL WASTE (unchanged)																
OPTION 1: PROPOSED POLICY WP1 - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT) (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036. (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3). (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).	+++	+++	++	++	++	++	++	++	+++	+++	++	++	+++	++	++	++
OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT) Carry forward Policy WP1 from existing SLWP 2012	+++	+	+	+	+	x	X	x	x	x	x	x	+	x	x	x
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)	+++?	+?	+?	+?	+?	x?	x?	x?	x?	x?	x?	x?	+?	x?	x?	x?
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP1 to expire in 2021	xx?	xx?	x	x	x	x?	X	x	xx?	xx?	xx?	xx?	x	xx?	xx?	xx?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	Proposed **Policy WP1 'Strategic Approach to Household and Commercial and Industrial Waste'** is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (1) Promoting **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to meet (but not exceed) the new London Plan apportionment over the plan period; eliminating the need to identify additional waste management sites by working with the waste management industry to develop more efficient, effective and cleaner management practices; and encouraging the intensification of suitable sites. (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of new and existing waste management sites; avoiding the uptake of additional employment land in South London for waste management operations; and minimising transport movements and other potentially adverse environmental impacts associated with waste management activities by seeking to promote complementary uses such as manufacturing from waste in line with 'circular economy principles. (9) Promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by seeking to minimise traffic congestion and air pollution arising from HGV movements to and from existing or upgraded waste management facilities for example by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas such as secondary material processing facilities. (10) Minimising **air pollution** and potential impacts on sensitive land-uses arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'. (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and by working with the waste management industry to develop more efficient and effective management practices. MEDIUM BENEFICIAL IMPACTS (++) FOR: (3) Promoting **waste re-use, recycling and recovery** within South London towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026 by working with the waste management industry to develop more efficient, effective and cleaner management practices; and by encouraging the intensification of suitable sites. Not safeguarding the Beddington Farmlands landfill site in LB Sutton following its scheduled closure in 2023 is also expected to boost waste recovery rates rather than disposal, thereby moving waste management practices further up the waste management hierarchy (4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste e.g. production of that can be used to power waste management and industrial processes. (5) M**inimising CO_2 emissions** from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices. It should be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP. (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** including summer heatwaves, contribution to the urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and appropriate sustainable drainage measures (SuDS) in all new or upgraded waste management facilities. (7) Promoting **sustainable drainage (SuDS) measures** in all new or upgraded waste management facilities in south London. (8) Promoting the highest standards of **sustainable design and construction** in all new, upgraded or iINTENSIFIED waste management facilities by increasing the number and proportion of waste management facilities achieving an 'Excellent' rating under the BREEAM New Construction 2018 scheme; increasing the number and proportion of waste management facilities promoting the use of responsibly sourced construction materials with lower environmental impact; and implementing sustainable management practices in connection with design, construction, commissioning, handover and aftercare of new, upgraded or intensified waste management facilities. (11) Protecting the quality of **South London's environment**, particularly for vulnerable receptors by minimising the adverse impacts of noise, vibration, dust, light, soil contamination, odour and water pollution during both the construction and operational phases; ensuring that all new or upgraded waste management facilities are enclosed/ screened; and helping to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment. (12) Protecting **biodiversity and habitats** by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of new or upgraded sites (e.g. green or 'living' roof); and by ensuring that major waste-related developments achieve no net loss in biodiversity value. (14) Minimising the potentially adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London, primarily by eliminating the need for additional sites and also by promoting the more efficient use of industrial land. (15) Minimising the potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by eliminating the need for additional waste management sites in south London sites and ensuring that all new or upgraded waste management facilities are enclosed. (16) Promoting. **equalities, accessibility and social inclusion** by minimising the potentially adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues. CONCLUSIONS The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Proposed Policy WP1 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (exceeding the apportionment and therefore carrying forward existing Policy WP1 by safeguarding existing sites and all industrial areas) and Option 2B (aiming to exceed the apportionment by safeguarding existing sites and identifying new waste sites). The potential impacts of *not* proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative.															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE (amended)																
OPTION 1: PROPOSED POLICY WP2 - SAFEGUARD EXISTING SITES ONLY (a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 420,275 tpa [to] 2036. The boroughs of the SLWP will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (Policy WP3). (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5. (d) New sites (either transfer or management) will not be supported forRadioactive Waste, Agricultural Waste and Hazardous Waste. (e) Development for improvements to the operation of and the enhancement ofthe environment of the Hogsmill and the Beddington STW will be supported,	++±	+++	+±	+±	++	+	+	+	+++	+++	+++	+	+±	+	+	+
OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industria areas where an identified need.	+++	+	+	+	+	x	X	x	x	x	x	x	+	x	x	x
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.	+++?	+?	+?	+?	+?	x?	x?	x?	x?	x?	x?	x?	+?	x?	x?	x?
OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP2 expires in 2021	xx?	xx?	x	x	x	x?	X	x	xx?	xx?	xx?	xx?	x	xx?	xx?	xx?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP2 'Strategic Approach to Other Forms of Waste'** has been amended since the issues and preferred options stage to reflect the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036. By comparison with the preferred policy put forward at the issues and options stage, Proposed Policy WP2 is now predicted to have greater beneficial impacts on (1) net self sufficiency (3) recycling and recovery (4) circular economy; and (13) economy & employment LARGE BENEFICIAL IMPACTS (+++) FOR: (1) Promoting **net self-sufficiency** within South London by safeguarding sufficient sites and encouraging the intensification of these sites as appropriate to meet the forecast arisings for C&D waste of 420,275 tpa [to] 2036. There is also an additional commitment as part of this policy to work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by ensuring that any proposals providing for additional construction and demolition waste capacity (either transfer or management) within South London are delivered only through the intensification of existing sites unless this is for compensatory provision. This will promote the efficient use of employment land and avoid the need to identify additional sites for the management of other forms of waste. (9) Promoting **sustainable transport** objectives within South London by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&D), radioactive, agricultural or hazardous waste streams. (10) Minimising **air pollution** and potential impacts on sensitive land-uses, again by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&D), radioactive, agricultural or hazardous waste streams'. This will be achieved by optimising the capacity of existing C&D waste management facilities, for example through the intensification of existing sites and by providing incentives to operators to manage greater volumes of C&D closer to their licensed capacities (11) Protecting **the quality of South London's environment** by opposing the development of new facilities for the management of radioactive, agricultural or hazardous waste streams; avoiding additional HGV movements and associated environmental impacts (see above); ensuring that additional C&D waste capacity (either transfer or management) can only be delivered through the intensification and therefore improvement of existing sites; ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed; and implementing environmental enhancements at the Hogsmill and Beddington Sewage Treatment Works respectively. MEDIUM BENEFICIAL IMPACTS (++) FOR: (3) Promoting **waste re-use, recycling and recovery** within South London by encouraging the intensification of existing sites for the management of C&D and other waste streams. This policy is now considered to have a medium beneficial impact based on the newly identified surplus in capacity for the management of C&D waste inn 2016 and the inclusion of a new commitment to work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (4) Helping to secure the transition to a **circular economy** within south London by promoting the efficient use of employment land for the management of C&D and other waste stream (formerly appraised as a 'small beneficial impoact). (5) **Minimising CO_2 emissions** from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices. The proposed replacement of the combined heat and power (CHP) plant at the Hogsmill Sewage Treatment Works is expected to deliver a net reduction in CO_2 emissions. It should also be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP. (13) Promoting **local employment and South London's economy** by eliminating the need for additional waste sites and/or 'broad locations' within SILs and other established industrial areas, thus safeguarding available industrial land and floorspace for other employment uses. SMALLER BENEFICIAL IMPACTS (+) FOR: (6) Ensuring that all upgraded/ intensified waste management facilities for the management of C&D and other waste streams are **fully adapted to the future impacts of climate change** including summer heatwaves, contribution to the UHI effect, flooding and drought by promoting green infrastructure and appropriate SuDS in all upgraded/ intensified facilities for the management of C&D and other waste streams. (7) Ensuring that all upgraded/ intensified waste management facilities for the management of C&D and other waste streams incorporate appropriate **sustainable drainage (SuDS) measures**. (8) Promoting the highest standards of **sustainable design and construction** in all upgraded/ intensified waste management facilities for the management of C&D and other waste streams. (12) Protecting **biodiversity and habitats** by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of upgraded/ intensified waste management facilities for the management of C&D and other waste streams; and through specific biodiversity enhancements planned for the Hogsmill STW (Kingston) and the ongoing restoration of the Beddington Farmlands landfill site (due for closure in 2023). (14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London, primarily by eliminating the need for additional sites for the management of C&D and other waste streams (15) Minimising the potentially adverse effects on human health and the open environment. (16) Promoting equalities objectives by avoiding the potentially adverse impacts which would otherwise be expected to arise from the designation of additional sites for the management of C&D and other streams and associated HGV movements, including air pollution, dust and noise. This is of particular benefit for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues. CONCLUSIONS The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Proposed Policy WP2 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (allowing proposals for C&D waste together with all 'other' waste streams including radioactive, agricultural or hazardous waste on both existing sites and all industrial areas and therefore carrying forward Policy WP2 of the existing SLWP) and Option 2B (allowing proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites). The potential impacts of *not* proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative. This policy has been strengthened in terms of its potential to meet a number of key sustainability objecvtives by comparison with Preferred Policy WP1 put forward at the issues and preferred options stage.															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standar of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP3: EXISTING WASTE SITES (unchanged)																
OPTION 1: PROPOSED POLICY WP3 Safeguarding (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only. Intensification (b) The intensification of use of a safeguarded waste site, measured by theincrease of tonnes of waste managed per annum, will be supported, subject tothe other policies in this South London Waste Plan and the relevant borough'sDevelopment Plan. Safeguarding Compensatory Provision (c) Compensatory provision for the loss of an existing safeguarded waste site willbe required with the level of compensatory provision necessary to beconsidered on a case-by-case basis. The list of safeguarded sites will beupdated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only. (d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted. Safeguarding Waste Hierarchy (e) Any development on an existing safeguarded waste site will be required toresult in waste being managed at least to the same level in the waste hierarchyas prior to the development.	+++	+++	+++?	++	++				+++	+++	++?	++	+++	++?	++?	++?
OPTION 2: EXISTING PLAN Carry forward Policies WP3 & WP4 from existing SLWP 2012.	++	++	++	++	+				++	++	+	+	++	+	+	+
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policies WP3 and WP4 to expire in 2021.	XX	XX	X	X	X				XX	XX	X	X	X	X	X	X

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP3 'Existing Waste Sites** is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (1) Promoting **net self-sufficiency** within South London by ensuring that all existing safeguarded waste management sites (listed in Pages 42-90 of the Issues and Preferred Options document are carried forward in the new Plan and safeguarded for waste uses only; and by ensuring that compensatory provision is made to make up for the loss of any safeguarded site within the South London Waste Plan area (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by promoting the intensification of uses on suitable sites in order to allow greater throughput (where there are not likely to be unacceptable impacts on the local road network); supporting waste operators who are seeking to increase the waste management element of waste transfer stations; and eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the local road network and the environment arising from new waste facilities and associated HGV movements). (3) Promoting **waste re-use, recycling and recovery** as far as practicable within South London towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026 by ensuring that any proposed development on an existing safeguarded waste site is required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development. However, as highlighted in Paragraph 5.26 of the Issues and Preferred Options document, there will inevitably be some occasions where the nature of waste facility will mean that waste operations cannot easily rise up the waste hierarchy by intensification. Not safeguarding the Beddington Farmlands landfill site in LB Sutton following its scheduled closure in 2023 is also expected to boost waste recovery rates rather than disposal, thereby moving waste management practices further up the waste management hierarchy (9) Promoting **sustainable transport** objectives by avoiding the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the local road network arising from HGV movements); seeking to minimise traffic congestion and air pollution arising from existing or upgraded waste management facilities for example by intensifying existing waste management uses on suitable sites or by co-locating complementary uses in industrial areas such as secondary material processing facilities; and by *not* providing compensatory provision within the partner south London boroughs to make up for any loss of waste management capacity outside of the plan area. (10) Minimising **air pollution** and potential impacts on sensitive land-uses by avoiding the need to identify additional waste management sites or 'broad locations' in South London thereby reducing air pollution from additional waste-related HGV movements; promoting intensification on suitable safeguarded sites; co-locating complementary uses in industrial areas; working with waste operators to encourage a shift from waste transfer operations to waste management practices. (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and by working with waste operators to develop more efficient and effective management practices. MEDIUM BENEFICIAL IMPACTS (++) FOR: (4) Helping to secure the transition to a **circular economy** within south London by seeking to drive waste management practices on intensified sites up the Government's waste hierarchy. (5) **Minimising CO_2 emissions** from waste management activities in South London by eliminating the need for additional waste management sites and associated HGV movements; and working with waste operators to develop more efficient, effective and cleaner management practices through the intensification of existing safeguarded sites. It should be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP. (11) Protecting the quality of **South London's environment**, particularly for vulnerable receptors, by avoiding the adverse impacts of noise, vibration, dust, light, soil contamination, odour and water pollution during both the construction and operational phases that would otherwise arise from the development of new waste management sites (either to exceed the apportionment for South London and/or to compensate for a loss of capacity outside the plan area). However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity' and Policy WP6 'Sustainable Design and Construction of Waste Facilities'. (12) Protecting **biodiversity and habitats** by eliminating the need for additional waste management sites within south London and associated NO_2 emissions from HGV movements (14) Minimising the potentially adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London, primarily by eliminating the need for additional sites and also by promoting the more efficient use of industrial land to increase throughputs e.g. for C&D waste streams. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity'. (15) Minimising the potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by eliminating the need for additional waste management sites in south London. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity'. (16) Promoting. **equalities, accessibility and social inclusion** by minimising the adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues, that would otherwise arise from the development of new waste management sites within south London, either to exceed the apportionment for South London and/or to compensate for any loss of capacity outside the plan area. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity' and Policy WP6 'Sustainable Design and Construction of Waste Facilities'. NEUTRAL/ NO IMPACT (++) FOR: (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change**. (7) Promoting **sustainable drainage (SuDS) measures** in all new or upgraded waste management facilities. (8) Promoting the highest standards of **sustainable design and construction** in all new, upgraded or intensified waste management facilities CONCLUSIONS The outcome of the appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four partner boroughs, Proposed Policy WP3 will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to carrying forward the existing strategic approach set out in Policies WP3 and WP4 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan including Proposed Policy WP3 are overwhelmingly negative.															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standar of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP4: SITES FOR COMPENSATORY PROVISION (unchanged)																
OPTION 1:PROPOSED POLICY WP4 Proposals for new waste sites to provide compensatory provision should: (a) Demonstrate that the site is capable of providing suff. compensatory capacity. (b) Be located on sites: (i) within SILs or Locally Significant Industrial Location; (ii) not having an adverse effect on nature conservation areas protected by international or national regulations; (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted in FZss 3a or 3b. (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area (d) Have particular regard to sites which: (i) do not result in visually detrimental development conspicuous from strategic open land (e.g. Green Belt or MOL); (ii) are located more than 100 metres from open space; (iii) are located outside Groundwater Source Protection Zones (i.e. farthest from protected groundwater sources) (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk (v) have direct access to the SRN; (vi) have no Public Rights of Way crossing the site; (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views; or (viii) offer opportunities to accommodate various related facilities on a single site.	++	++	+?	+?	+	++	+++	++?	++	+	++	++	+	++	++	++
OPTION 2: EXISTING PLAN Carry forward Policy WP5 in existing SLWP	++	+	+?	+?	+?	+	++	+?	+	+?	+	+	+?	+?	+?	+?
OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP5 expires in 2021	XX	XX	X	X	X	XX	XX	XX	XX	X	XX	XX	X	XX	XX	XX

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP4 'Sites for Compensatory Provision** is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (7) Avoiding, reducing and managing flood risk from new waste management sites introduced for the purpose of providing compensatory capacity within the south London Plan area by ensuring that they have no adverse effects of on-site or off-site flood risks in accordance with the relevant Local Plan policies of the four partner boroughs; the sequential and exceptions tests in government planning practice guidance and detailed technical advice in the respective strategic flood risk assessment (SFRA) reports produced for each borough. However these beneficial impacts are dependent on the implementation of these other policies as appropriate e.g. requiring SuDS measures and meeting the requirement for greenfield run-off rates and volumes in the 1 in 100 year storm event plus climate change – see part (b)(iv). MEDIUM BENEFICIAL IMPACTS (++) FOR: (1) Promoting **net self-sufficiency** within South London by requiring planning applications for new waste sites to demonstrate that the proposed waste management facility is capable of providing sufficient compensatory capacity to make up for the loss of any safeguarded site within the South London Waste Plan area - see part (a). (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by ensuring that any new waste facilities give full consideration to range of locational constraints and opportunities with respect to the strategic road network, flood risk, strategic open land, public open space, protected groundwater sources, accessibility to sustainable modes of transport, public rights of way, nature conservation areas, Conservation Areas, Areas of Special Local Character (ASLC) and strategic views. The advantages of co-location will be balanced against the potential negative impacts arising from an over-concentration of waste operations in one locality – see part (c). (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** ,primarily - in the case of Policy WP4 - by ensuring that such sites have no adverse effects in relation to on or off-site flood risks in accordance with the relevant Local Plan policies of the four partner boroughs; the sequential and exceptions tests in government planning practice guidance and detailed technical advice in the respective strategic flood risk assessment (SFRA) reports produced for each borough (see above). However, this positive assessment is subject to the relevant Local Plan policies being applied and enforced by the respective local planning authorities. (8) Promoting the highest standards of **sustainable design and construction** by ensuring that all new waste management facilities within the plan area comply with the relevant environmental criteria set out in parts (a) to (e); (9) Promoting **sustainable transport** objectives by having particular regard to sites which have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk – see part (d)(iv). (11) Minimising potential risks to human health, adjacent land uses and the local environment by only permitting new waste management sites where it can be demonstrated that the proposed facility is needed to provide compensatory capacity in South London and ensuring that all new waste management facilities within the plan area comply with the relevant environmental criteria set out in parts (a) to (e); (12) Protecting **biodiversity and habitats** by 'having particular regard to' potential waste management sites which do not have an adverse effect on nature conservation areas protected either by international or national regulations or which are designated in the respective Local Plans of the four partner boroughs. In "meeting the policies of the relevant development plan" under part (f), the requirement upon developers to apply a biodiversity accounting methodology to demonstrate that there is no net loss in biodiversity value may come into play in some circumstances e.g. LB Sutton. Potential adverse impacts on biodiversity and habitats will also be minimised by ensuring that any new waste management facilities are steered towards SILs or locally significant industrial locations (14) Minimising the potentially adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London by 'having particular regard to' sites which do not result in visually detrimental development conspicuous from strategic open land; are located more than 100 metres from open space; and do not adversely affect Conservation Areas, Areas of Special Character or strategic views. (15) Minimising the potentially adverse effects on **human health and the open environment**. by ensuring that any new waste management facilities are steered towards Strategic Industrial Locations (SILs) or locally significant industrial locations; and by 'having particular regard to' sites which do not result in visually detrimental development conspicuous from strategic open land; are located more than 100 metres from open space; and by including appropriate environmental mitigation measures under part (e). Potentially adverse impacts on human health and the open environment will also be minimised by ensuring that any new waste facilities are only located within SILs or locally significant industrial locations (16) Promoting. **equalities, accessibility and social inclusion** by only permitting new waste sites where it can be demonstrated that the proposed waste management facility is genuinely needed to compensate for the loss of any safeguarded site within the South London Waste Plan area, thus avoiding additional adverse environmental impacts on vulnerable receptors (including equalities target groups) and the strategic road network which would otherwise arise from allowing a greater number of 'windfall' sites to be developed on unsuitable locations. Potential adverse impacts on equalities target groups will also be minimised by ensuring that any new waste management facilities are steered towards SILs or locally significant industrial locations and do not conflict with Public Rights of Way - see parts (b)(i) and (d)(vi). SMALLER BENEFICIAL IMPACTS (+) FOR: (3) Promoting **waste re-use, recycling and recovery** within South London by giving consideration to the potential advantages of co-location of waste facilities in driving waste management up the Government's waste hierarchy. However, this assessment is subject to the other relevant policies of the SLWP and the respective Local Plans being fully implemented - see part (f). (4) Helping to secure the transition to a **circular economy** within south London, again by giving consideration to the potential advantages of co-location of waste facilities in driving waste management up the Government's waste hierarchy. However, this assessment is subject to the other relevant policies of the SLWP and the respective Local Plans being fully implemented - see part (f). (5) **Minimising CO_2 emissions** from waste management activities in South London by only permitting new waste sites where it can be demonstrated that the proposed waste management facility is genuinely needed to compensate for the loss of any safeguarded site within the SLWP area, thus minimising additional CO_2 emissions that would otherwise arise from new waste management facilities and associated HGV movements. (10) Minimising **air pollution** and potential impacts on sensitive land-uses arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'. (13) Promoting **local employment** by only permitting new waste sites where it can be demonstrated that the proposed facility is genuinely needed to compensate for the loss of any safeguarded site within the SLWP area, thus avoiding the unnecessary loss of employment land across the south London area. This is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest. CONCLUSIONS The outcome of the appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four partner boroughs, Proposed Policy WP4 will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to carrying forward the existing approach to the consideration of additional non-safeguarded 'windfall' sites set out in Policy WP5 of the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan incorporating Proposed Policy WP4 are overwhelmingly negative.															

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	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standar of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP5: PROTECTING AND ENHANCING AMENITY (unchanged)																
OPTION 1: PROPOSED POLICY WP5 (a)Developments for compensatory/intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment. (b) The parts of a [site] where unloading, loading, storage and processing takes place should be in a fully enclosed covered building. (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected; (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas (iv) Groundwater, surface water and watercourses (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated (vi) Noise and vibration from the plant and traffic generated (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials (viii) The safety and security of the site (ix) Odour, litter, vermin and birds; and, (x) The design of the facility, particularly • complementing or improving the character of an area; • limiting the visual impact of the development by employing hard and soft landscaping and minimising glare; • being of a scale, massing or height appropriate to the townscape or landscape; • using good quality materials; • minimising the requirement for exterior lighting; and, • utilising high-quality boundary treatments.	+	++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+++	+++	+++
OPTION 2: EXISTING PLAN Carry forward Policy WP7 in SLWP 2012	+?	+	++	++	++	++	++	++	++	++	++	++	+	++	++	++
OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP7 expires in 2021	X	X	XX	XX	XX	XX	XX	XX	XX	XX	XX	XX	X	XX	XX	XX

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP5 'Protecting and Enhancing Amenity** is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (3) Promoting **waste re-use, recycling and recovery** within South London by requiring a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development; (4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible, again by requiring a Circular Economy Statement to be submitted; (5) M**inimising CO_2 emissions** from waste and associated HGV movements by requiring an Energy Assessment, BREEAM assessment ('Excellent' rating), Transport Assessment and Travel Plan to be submitted in support of any application; (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** including flooding, overheating, contribution to the urban heat island (UHI) effect and drought by requiring a Flood Risk Assessment (FRA), SuDS strategy, BREEAM assessment and sustainability statement; (7) Promoting **sustainable drainage (SuDS) measures** and greenfield run-off rates by 'having particular regard' to the potentially adverse impacts of compensatory or intensified waste developments on groundwater, surface water and watercourses and by requiring a Flood Risk Assessment (FRA), SuDS strategy/site drainage details and hydrological assessment to be submitted. As shown in the Sequential Test (Appendix 3), proposed waste facility located within higher flood risk areas will be required to demonstrate the Government's 'Exceptions test' in order to demonstrate that the development will provide (i) wider sustainability benefits to the community that outweigh flood risk, and (ii) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall; (8) Promoting the highest standards of **sustainable design and construction** in all such facilities by requiring a BREEAM assessment ('Excellent' rating) and sustainability statement to be submitted in support of any planning application. For larger waste management proposals with potentially 'significant' effects, an Environmental Assessment may be required under the EIA Regulations 2017 where this has been 'screened in' by the relevant local planning authority; (9) Promoting **sustainable transport** objectives by requiring an Air Quality Impact Assessment, Transport Assessment, Travel Plan, Route Management Strategy and Delivery Servicing Plan/Freight Plan to be submitted as appropriate in support of any planning application for a proposed compensatory or intensified waste development, in order to demonstrate any transport impacts do not significantly adversely affect people and the environment; (10) Minimising **air pollution** and potential impacts on sensitive land-uses arising, particularly within 'Air Quality Focus Areas' by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building and requiring the submission of Air Quality Impact Assessments, Transport Assessments, Travel Plans, Route Management Strategies and Delivery Servicing Plans/Freight Plans as appropriate; (11) Protecting the quality of **South London's environment**, particularly for vulnerable receptors, by ensuring that any potential adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment. More specifically, under Part (c) of this policy, any planning application for such development must be accompanied by an Air Quality Impact Assessment, Transport Assessment and Travel Plan, and 'have particular regard' to the potentially adverse impacts on open space; biodiversity and nature conservation sites; archaeological sites; the historic environment; sensitive receptors, such as schools, hospitals and residential areas; groundwater, surface water and watercourses; air emissions, including dust noise and vibration and traffic generation. arising from waste management operations and associated HGV movements (12) Protecting **biodiversity and habitats** by 'having particular regard' to the potentially adverse impacts on biodiversity and nature conservation sites protected by international/ national regulations or local planning designations and by requiring a Biodiversity Assessment to be submitted in support of any planning application which is likely to affect nature conservation areas such as Local Nature Reserves, Sites of Metropolitan, Borough or Local Importance for Nature Conservation (SINCs), o green corridors. In certain cases (e.g. LB Sutton) biodiversity accounting evidence will need to be submitted to demonstrate that there will be no net loss of biodiversity value arising from the development. (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by requiring job creation details, including skills, training and apprentice opportunities, together with a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development (14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London by ensuring that all compensatory or intensified waste developments are of a scale, massing or height appropriate to the local townscape or landscape; minimising the requirement for exterior lighting; utilising high-quality boundary treatments; and having 'particular regard' to the potentially adverse impacts on the historic environment. Under this policy, any potentially adverse impacts on townscape and visual amenity will be addressed or mitigated by requiring the submission of an assessment of the impact on the built and historic environment, a landscape assessment and details of landscaping proposals, including screening, landscaping works and boundary treatments to be submitted in support of any planning application; (15) Minimising any potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building. Planning applications for a proposed compensatory or intensified waste development must be accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. Details of appropriate measures for protecting Public Rights of Way are also required to be submitted where relevant (16) Promoting **equalities, accessibility and social inclusion** by requiring an Access Strategy to be submitted in support of any planning application. Since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way is also beneficial. MEDIUM BENEFICIAL IMPACTS (++) FOR: (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed to achieve levels that will not significantly adversely affect people and the environment; and by requiring applications to be supported by the relevant information listed in the schedule attached to Policy WP5, including a Circular Economy Statement. SMALLER BENEFICIAL IMPACTS (+) FOR: (1) Promoting **net self-sufficiency** within South London by allowing for developments for compensatory or intensified waste facilities to proceed *subject to* meeting the requirements of Policy WP4 'Sites for Compensatory Provision' and provided that it can be demonstrated that 'any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment' as required in Part (a) CONCLUSIONS The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP5 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP5 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative														

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	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES (amended)																
OPTION 1: PROPOSED POLICY WP6 (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptablewhere the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies ofthe relevant borough"s Development Plan. (b) Waste facilities will be required to: (i) minimise on-site carbon dioxide emissions in line with 2020 London Plan Policy SI2; (ii) be fully adapted and resilient to thefuture impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/ heatwaves, air pollution, drought conditions and impacts on biodiversity; (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and greeninfrastructure measures as appropriate in accordance with 2020 London Plan Policy G5; (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials; (v) minimise waste and promote sustainable management of construction waste on site; and, (vi) protect, manage and enhance local habitats and biodiversity.	+?	++	+++	+++	+++	+++	+++	+++	++	+++	+++	++	++	+	+++	+++
OPTION 2: EXISTING PLAN Carry forward Policy WP6 from SLWP 2012	+?	+	++	++	++	++	++	++	+	++	++	+	+	+?	++	++
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP6 to expire in 2021	X	X	XX	XX	XX	XX	XX	XX	X	XX	XX	X	X	XX	XX	XX

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	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standar of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP6 'Sustainable Design and Construction of Waste Facilities** This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that, where appropriate, the sustainability credentials of a waste development can been measured against the BRE's 'CEQUAAL' scheme in place of the BREAAM New Construction scheme. It is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by requiring all waste developments to achieve an 'Excellent' rating under the appropriate BREEAM scheme or under the BRE's CEQUAAL scheme; to make more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement; to demonstrate that they minimise waste and promote sustainable management of construction wastes on site; to minimise on-site CO_2 emissions in line with the 35% target in Policy SI2 of the draft new London Plan and deliver net zero carbon standards through carbon offsetting; and to require all waste developments to give consideration to the recycling of CD&E waste on-site. (3) Promoting **waste re-use, recycling and recovery** within South London by requiring all proposed waste developments to achieve BREEAM 'Excellent' where viable; demonstrate how it will make more efficient use of resources and reduce the lifecycle impacts of construction materials; demonstrate how it will support circular economy principles through the submission of a Circular Economy Statement (as required under Policy WP5); and demonstrate that the facility will minimise waste and promote sustainable management of construction wastes on site. (4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by requiring submission of a Circular Economy Statement (as required under Policy WP5) and by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&E) waste on-site (5) M**inimising CO_2 emissions** from waste and associated HGV movements by requiring all major waste developments to minimise on-site CO_2 emissions in line with the 35% target in Policy SI2 of the draft new London Plan; deliver net zero carbon standards through developer contributions to the respective carbon offset funds operated by each of the four boroughs; and requiring all waste developments to achieve BREEAM 'Excellent' where viable. (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** in accordance with Draft London Plan Policy GG6 , particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; and by requiring all waste developments to have regard to best practice in 'Designing Waste Facilities - A Guide to Modern Design in Waste' (DEFRA, 2008) in considering climate change adaptation measures in schemes e.g. by ensuring that building layout takes advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter; by ensuring that external cladding materials are high mass (e.g. brick or concrete) as they release heat slowly; and by steering storage and unoccupied areas towards the warmest areas of the facility. (7) Avoiding reducing and managing **flood risk to and from waste developments by** incorporating appropriate SuDS measures in line with Draft London Plan Policy G5, the partner boroughs' Strategic Flood Risk Assessments (SFRAs) and the relevant local planning policies. This require developers to provide details of the design storm period and intensity, proposed SuDS measures to delay and control the rate of surface water discharged from the site and proposed measures to prevent pollution of the receiving groundwater and/or surface waters. In most cases, proposed waste developments will need to demonstrate that (i) the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be as close as reasonably practicable to the greenfield run-off rate for the same event (in line with the Government's non-statutory standards) (ii) where greenfield run-off rates cannot be achieved, to demonstrate that the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be no more than 3 times the calculated greenfield run-off rate for the same event (iii) demonstrate that the 1 in 30 year rainfall event (plus 30% for climate change) can be contained without flooding; any flooding occurring between the 1 in 30 and 1 in 100 year event (plus 30% for climate change) will be safely contained on site; and that rainfall in excess of the 1 in 100 year event is managed to minimise risks. For locations within the River Wandle catchment, all waste developments must support of the objectives of the River Wandle Catchment Flood Management Plan (CFMP). (8) Promoting the highest standards of **sustainable design and construction** in all such facilities by requiring all waste developments to achieve BREEAM 'Excellent' where viable and, as part of the construction phase, by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&E) waste on-site. (10) Minimising **air pollution** and potential impacts on sensitive land-uses arising by making more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement and by requiring all waste developments to incorporate appropriate measures to address odour issues, for example by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5. (11) **Minimising the adverse impacts arising from the construction and operation of waste facilities** by requiring all waste developments to achieve BREEAM 'Excellent' where viable; to have regard to DEFRA best practice; to protect, manage and enhance local habitats and biodiversity; to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures which manage risk both to and from the development over its planned lifetime (15) Minimising any potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5 (16) Promoting **equalities, accessibility and social inclusion** by ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** in accordance with Draft London Plan Policy GG6. Climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as , such as the young, the elderly and people suffering from respiratory issues MEDIUM BENEFICIAL IMPACTS (++) FOR: (9) Promoting **sustainable transport** objectives by requiring all waste developments to demonstrate that they minimise waste and promote sustainable management of construction wastes on site. (12) Protecting **biodiversity and habitats** by requiring all waste developments to demonstrate that they 'protect, manage and enhance local habitats and biodiversity' for example by incorporating green roofs and other blue and green infrastructure measures as appropriate. However this is also subject to the implementation of part (c) of Policy WP5 which seeks to ensure that that development does not harm nature conservation areas (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by making more efficient use of resources and promoting circular economy principles. SMALLER BENEFICIAL IMPACTS (+) FOR: (1) Promoting **net self-sufficiency** within South London and (14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London. CONCLUSIONS The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP6 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative.															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP7: THE BENEFITS OF WASTE (unchanged)																
OPTION 1: PROPOSED PLAN - POLICY WP7 (a) Waste development for the intensification of sites,which involve the reuse, refurbishment,remanufacture of products or the production of by-products, will be encouraged. (b) Waste development for additional Energy from Waste facilities will not be supported (c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, andapprenticeship opportunities.	+++	+++	+++	+++	+++			++?		+++	++?	+?	+++		+++	+++
OPTION 2: EXISTING PLAN Carry forward Policy WP8 from SLWP 2012.	++	++	++	++	++			++		++	++	+	+		++	++
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP8 to expire in 2021.	XX	XX	XX	XX	XX			X		XX	X	X	X		XX	XX

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP7 'The Benefits of Waste** is predicted to have::															

LARGE BENEFICIAL IMPACTS (+++) FOR:

(1) Promoting **net self-sufficiency** within South London by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products.

(2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products; and by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy.

(3) Promoting **waste re-use, recycling and recovery** within South London by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products, such as biogas from composting and refuse-derived fuel.

(4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible while by recognising that achieving London-wide waste reduction and recycling targets will mean that no new EfW in London will be needed.

(5) M**inimising CO_2 emissions** from waste and associated HGV movements by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products?

(10) Minimising **air pollution** and potential impacts on sensitive land-uses by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)

(13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas

(15) Minimising any potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)

(16) Promoting **equalities, accessibility and social inclusion** by ensuring that by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas

MEDIUM BENEFICIAL IMPACTS (++) FOR:

(8) Promoting the highest standards of **sustainable design and construction** by encouraging waste treatment applications which achieve a prolonged product life (i.e. through reuse and refurbishment), provide secondary materials through remanufacture, lead to the production of by-products, such as biogas from composting and refuse derived fuel

(11) **Minimising the adverse impacts arising from the construction and operation of waste facilities** by encouraging proposals for the intensification of existing waste management sites

SMALLER BENEFICIAL IMPACTS (+) FOR:

(12) Protecting **biodiversity and habitats** by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy.

NEUTRAL IMPACTS FOR:

(6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change**.

(7) Avoiding reducing and managing **flood risk to and from waste developments**.

(9) Promoting **sustainable transport** objectives.

(14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London. n/a

CONCLUSIONS

The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP7 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan are generally negative.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES (new policy)																
OPTION 1: PROPOSED POLICY WP8 (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them. (b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, the applicant should: (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing,extant, a permission for additional capacity or developed for compensatory provision. (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations.	+	+	+				+	+		++	++		+		++	+
OPTION 2: EXISTING PLAN Not applicable.	N/A															
OPTION 3: 'DO-NOTHING' SCENARIO Do not include NEW POLICY W8 in draft SLWP for submission.	x?	x?	x?				x?	x?		x	x		x?		x	x?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP8 'New Development Affecting Waste Sites'** is a new policy to reflect the requests from SUEZ (Representation C20/10) and Veolia (Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy. Proposed Policy WP8 is considered to have: MEDIUM BENEFICIAL IMPACTS (++) FOR: (10) Helping to minimise the potential impacts of **air pollution** on sensitive land-uses by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures such as planting and screening ('agent of change' principle). (11) Helping to minimise **adverse impacts arising from the operation of waste facilities** on sensitive land-uses by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures ('agent of change' principle). (15) Helping to minimise potentially adverse effects on **human health** arising from air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures such as planting, sustainable drainage measures (SuDS) and screening ('agent of change' principle). SMALLER BENEFICIAL IMPACTS (+) FOR: (1) Helping to promote **net self-sufficiency** within South London over the plan period to 2036 by avoiding unreasonable restrictions being placed on existing operational or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision. (2) Helping to promote an environmentally **sustainable strategic approach** to managing South London's waste arisings by enabling existing, extant, permitted or intensified sites to continue in operation and therefore avoid the need for new waste sites to be developed in less suitable locations. (3) Promoting **waste re-use, recycling and recovery** within South London, again by avoiding unreasonable restrictions being placed on existing operational or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision. (7) Helping to avoid, reduce and manage **flood risk to and from waste developments** by ensuring that that newly proposed developments located within the vicinity of operational waste sites and within flood risk areas incorporate appropriate flood risk alleviation works and sustainable drainage (SuDS) measures. (8) Helping to promote the highest standards of **sustainable design and construction** by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate appropriate measures to mitigate the impacts of air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by avoiding unreasonable restrictions being placed on existing or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision. (16) Helping to promote **equalities, accessibility and social inclusion** within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities; NEUTRAL IMPACTS FOR: (6) Helping to ensure that all new or upgraded waste management facilities are **adapted to the future impacts of climate change**. (4) Helping to secure the transition to a circular economy within south London. (5) Helping to **minimising CO_2 emissions**. (9) Helping to deliver **sustainable transport** objectives. (12) Helping to promote **biodiversity and habitats** (14) Helping to minimise adverse impacts on the quality of **townscape and visual amenity and the historic environment**. CONCLUSIONS Through the introduction of the 'agent of change' principle, the appraisal shows that Proposed Policy WP8 is likely to have certain benefits in terms of minimising the potential impacts of existing or intensified waste sites, extant schemes, permitted schemes or sites developed for compensatory provision on human health and quality of life arising from air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance by ensuring that nearby sensitive developments incorporate good design and appropriate mitigation measures such as planting, sustainable drainage measures (SuDS) and screening.															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP9: PLANNING OBLIGATIONS (unchanged)																
PTION 1: PREFERRED POLICY Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.	+?	++?		+?	+?	++?	++?	++?	++?	++?	++?	++?	++?	+?	++?	++?
OPTION 2: EXISTING PLAN Carry forward Policy WP9 from SLWP 2012.	+?	++?		+?	+?	++?	++?	++?	++?	++?	++?	++?	++?	+?	++?	++?
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP9 to expire in 2021.	?	?		?	?	?	?	?	?	?	?	?	?	?	?	?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP9 'Planning Obligations** is predicted to have::															

MEDIUM BENEFICIAL IMPACTS (++) FOR:

(2) Helping to promote an environmentally **sustainable strategic approach** to managing South London's waste arisings by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation sites of international, national, regional or local importance; environmental enhancement measures; flood risk compensation works; archaeological investigation, recording and keeping of artefacts and safeguarding of remains; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; job brokerage, training and skills to encourage local employment opportunities; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.

(6) Helping to ensure that all new or upgraded waste management facilities are **adapted to the future impacts of climate change** by potentially providing for flood risk alleviation works, off-site monitoring of the water environment, off-site planting, environmental enhancement measures and other climate change adaptation measures. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.

(7) Helping to avoid, reduce and manage **flood risk to and from waste developments** by potentially contributing towards for off-site flood risk alleviation works.

(8) Helping to promote the highest standards of **sustainable design and construction** by potentially providing for low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation; or flood risk alleviation works

(9) Helping to deliver **sustainable transport** objectives by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; off-site monitoring of emissions; and any other strategic transport infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.

(10) Helping to minimise **air pollution** and potential impacts on sensitive land-uses by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; environmental enhancement measures; off-site monitoring of emissions and the water environment; and the provision and management of off-site or advance planting and screening measures.

(11) Helping to minimise the **adverse impacts arising from the construction and operation of waste facilities** by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.

(12) Helping to promote **biodiversity and habitats** through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures

(13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by potentially providing for job brokerage, training and skills to encourage local employment opportunities; and the delivery of key strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs

(15) Helping to minimise potentially adverse effects on **human health and the open environment** by potentially providing for additional traffic management measures (including the routing of vehicles; access and highway improvements); protection of nature conservation sites of international, national, regional or local importance; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; low or zero carbon infrastructure;;; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures; and other environmental enhancement measures

(16) Helping to promote **equalities, accessibility and social inclusion** within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities;

It should be noted however that, under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.

SMALLER BENEFICIAL IMPACTS (+) FOR:

(1) Helping to promote net self-sufficiency within South London by enabling proposals for the intensification of existing waste management sites or compensatory provision to proceed which may otherwise be unacceptable in planning terms.

(4) In certain circumstances, helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by potentially providing for low or zero carbon infrastructure and carbon offsetting contributions. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.

(5) Helping to m**inimising CO_2 emissions** in certain circumstances by providing for access and highway improvements; low or zero carbon infrastructure or carbon offsetting contributions.

(14) Helping to minimise the adverse impacts of waste management facilities on the quality of **townscape and visual amenity and the historic environment** in south London by potentially providing for environmental enhancement measures; the provision and management of off-site or advance planting and screening measures; and archaeological investigation, recording and keeping of artefacts and safeguarding of remains.

NEUTRAL IMPACTS FOR:

(3) Promoting **waste re-use, recycling and recovery** within South London.

CONCLUSIONS

The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP8 is likely to have beneficial impacts on the majority of sustainability objectives making up the SA Framework and these beneficial impacts are broadly unchanged from Policy WP8 of the existing SLWP 2012 (since the policy wording has been carried forward unchanged).. While the effects of *not* proceeding with a new waste plan and therefore deleting Policy WP8 of the existing SLWP 2012 are appraised as uncertain, rather than necessarily negative, since under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP10: MONITORING AND CONTINGENCIES (new policy)																
OPTION 1: PROPOSED POLICY WP10 The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton"s Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.	+ +	+ +	+ +	+ +	+	+	+	+ +	+ +	+ +	+ +	+	+		+ +	+
OPTION 2: EXISTING PLAN Not applicable.	N/A															
OPTION 3: 'DO-NOTHING' SCENARIO Do not include NEW POLICY W8 in draft SLWP for submission.	x	x	x	x	x?	x?	x?	x	x	x	x	x?	x?		x	x?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standar of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Proposed Policy WP10 'Monitoring and Contingencies'** is a new policy intruced to ensure that the SLWP meets statutory requirements for monitoring and the Mayor of London's request for contingencies. It is considered to have: MEDIUM BENEFICIAL IMPACTS (++) FOR: (1) Helping to meet the apportionment and **promote net self-sufficiency** for household and C&I, CD&E and other waste streams within South London by monitoring and reviewing waste imports and exports to and from surrounding regions and the performance of each site in terms of the nature of waste treatment operations, operational throughputs, intensification of uses and introduction of circular economy principles. (2) Helping to optimise and intensify new and existing waste sites within South London and make the most **efficient use of industrial land** by monitoring and reviewing the performance of each safeguarded site in terms of the nature of waste treatment operations, operational throughputs and the extent to which each site's potential for intensification has been realised. (3) Driving waste management up the waste hierarchy by monitoring rates of **waste re-use, recycling and recovery** within South London against the relevant targets established in the Mayor's Environmental Strategy 2018, the New London plan and the four Boroughs. (4) Promoting a transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by monitoring and reviewing the performance of each site in terms of the nature of waste treatment operations, operational throughputs, intensification and the co-location of complementary industrial uses (8) Helping to promote the highest standards of **sustainable design and construction** in new or upgraded waste facilities by monitoring achievement of the minimum standards required to achieve an 'Excellent' rating under either the BREEAM New Construction 2018 scheme (applicable to buildings) or the Building Research Establishment's (BRE) CEEQUAL scheme (applicable to associated waste infrastructure) – see Proposed Policy WP6 above (9) Helping to deliver **sustainable transport** objectives with the plan area by monitoring or requiring developers to monitor (i.e. through planning obligations) additional HGV movements arising from new, upgraded or intensified waste sites and associated impacts upon the local road network. Subject to resources, the ongoing monitoring of traffic management measures, vehicle routing schemes; access and highway improvements; transport emissions; and the effectiveness any other strategic transport infrastructure will also help to promote sustainable transport objectives in the context of waste management. (10) Helping to minimise **air pollution** and potential impacts on sensitive land-uses by monitoring or requiring developers to monitor additional HGV movements arising from new, upgraded or intensified waste sites and associated impacts on air quality pollution particularly on sensitive land-uses. (11) Helping to minimise the **adverse impacts arising from the construction and operation of waste facilities** by monitoring the effectiveness of new traffic management measures, including the routing of HGVs; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure (15) Helping to minimise potentially adverse effects on **human health and the open environment** by monitoring or requiring developers to monitor (i.e. through planning obligations) air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance potentially arising from the construction and operation of new or upgraded waste facilities in order to ensure compliance with the relevant planning policies and conditions, including the minimum standards required to achieve an 'Excellent' rating under either the BREEAM New Construction 2018 scheme (applicable to buildings) or the Building Research Establishment's (BRE) CEEQUAL scheme (applicable to associated waste infrastructure) – see Proposed Policy WP6 above SMALLER BENEFICIAL IMPACTS (+) FOR: (5) Helping to m**inimise CO_2 emissions and address the causes of climate change** by requiring developers to undertake post-construction monitoring in accordance with the New London Plan 2020 (in line with the Mayoral principle of 'be seen'). (6) Helping to ensure that all new or upgraded waste management facilities are **adapted to the future impacts of climate change** in line with the minimum sustainability requirements of the New London Plan 2020 and environmental best practice by monitoring the implementation and effectiveness of climate change adaptation measures, such as flood risk alleviation works, SuDS measures, planting and other green infrastructure measures aimed at counteracting the urban heat island (UHI) effect (7) Helping to avoid, reduce and manage **flood risk to and from waste developments** by monitoring the implementation and effectiveness of flood resistance/resilience measures, flood alleviation works and SuDS measures both on-site and off-site. (12) Helping to promote **biodiversity and habitats** through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** (16) Helping to promote **equalities, accessibility and social inclusion** within South London by monitoring or requiring developers to monitor (i.e. through the use of planning obligations) the implementation and effectiveness of access and highway improvements; environmental enhancement measures; air quality, water pollution, noise, light pollution and other sources of environmental nuisance potentially arising from the construction and operation of new or upgraded waste facilities. Monitoring of local employment provision and training opportunities will also help to contribute towards equalities objectives; NEUTRAL IMPACTS FOR: (14) Helping to minimise the adverse impacts of waste management facilities on the quality of **townscape and visual amenity and the historic environment** in South London CONCLUSIONS The results of the appraisal shows that, by ensuring that the implementation and effectiveness of the New SLWP 2021-2036 is monitored on an annual basis throughout the plan period against the relevant targets, Proposed Policy WP10 is predicted to have to have beneficial impacts on the majority of sustainability objectives making up the SA Framework. The tracking of progress against sustainability targets and allowing for contingencies is particularly important with respect to meeting the apportionment, achieving self-sufficiency, promoting the efficient use of industrial land, promoting the circular economy and minimising the impact of traffic movements, air pollution, water pollution, noise and light pollution arising from the construction and operation of waste facilities.															

Part B: Proposed Sites

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: CROYDON																
C1 Able Waste Services 42 Imperial Way, Croydon CR0 4RR	+++	++	++	+	+	+?	+	+?	+?	+?	+?	?	++	+?	+?	?

Type	Transfer + treatment
Waste Accepted	C&D
Max throughput	46,463 tpa
Licensed capacity	74,999 tpa

NOTES:
- the site is comprised of mix of new and 1970s warehouses, mostly two-storey, located lies within the Imperial Way Industrial Estate which;
- good access to strategic road network;
- potential cumulative impact with New Era Metals ;
- located within Archaeological Priority Area;
- located in close proximity to MOL (250m south and east); Historic Park and Garden (250m south); SINC (250m south) and Croydon Panorama (250m east);
- not located within Air Quality Focus Area, Green Belt or MOL;
- low flood risk (Flood Zone 1); and
- low potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank; and
- providing appropriate soft landscaping and regard to the adjacent Roundshaw Park.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
36	25	25	**86**

C4 Days Aggregates Purley Depot, Station Yard, Approach Road, Purley, Surrey, CR8 2AL (2.0 ha)	+++	+++	++	++	++		+		+	x?	x?		++	?	x	x?

Type	Transfer + treatment
Waste Accepted	C&D
Max throughput	179,300 tpa
Licensed capacity	249,999 tpa

NOTES:
- open aggregates sorting, treatment, recycling and storage facility with associated two-storey mid-century office block and enclosed sheds;
- reasonably isolated from nearby residential uses and no other waste uses nearby;
- access via Approach Road - a no through road serving Purley Station, Day Aggregates and London Concrete
- located adjacent to Purley rail aggregate terminal.
- located within Purley Cross and Russell Hill AQFA
- located within Archaeological Priority Area
- not located within Green Belt or MOL or any other designation
- Low flood risk (Flood Zone 1); and
- low potential for intensification (this is a dual-use site, with a minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level).

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts
- Evaluating and preserving any archaeological remains as the site lies within an
- archaeological priority area (Place Specific Policy - Purley District Centre and environs (DM42.1)
- Not harming biodiversity in the vicinity
- Providing appropriate soft landscaping

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
36	25	25	**86**

C5A Factory Lane Transfer Station, Factory Lane, Croydon CR0 3RL (1.2 ha)	+++	++ (potentially)	+ (potentially)	+ (potentially)	+ (potentially)	++ (potentially)	x	+ (potentially)	+ (potentially)	+	+	?	++ (potentially)	+	+ (potentially)	+ (potentially)

Type	Transfer
Waste Accepted	HCI
Max throughput	19,736 tpa
Licensed capacity	200,000 tpa

NOTES:
- large triple-storey building surrounded by hardstanding with power lines overhead;
- located within larger industrial area close to other waste facilities but away from residential neighbourhoods;
- good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236.
- located within Archaeological Priority Area;
- located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site.
- Located in close proximity to Wandle Park to the south east of the site.
- not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and
- some potential for intensification and for co-locating other waste uses on the site.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any remains in the Ampere Way archaeology priority area
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
42	25	25	**92**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
C5B Factory Lane Reuse & Recycling Centre, Factory Lane, Croydon CR0 3RL (0.4 ha)	++	+	+	+?	+?	++	X	+	+	+	+	?	++ (potentially)	+	+ (potentially)	+ (potentially)

Type	Transfer
Waste Accepted	HCI
Max throughput	19,736 tpa
Licensed capacity	200,000 tpa

NOTES:
- large triple-storey building surrounded by hardstanding with power lines overhead;
- located within larger industrial area close to other waste facilities but away from residential neighbourhoods;
- good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236.
- located within Archaeological Priority Area;
- located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site.
- Located in close proximity to Wandle Park to the south east of the site.
- not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and
- low potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any remains in the Ampere Way archaeology priority area
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
42	25	25	**92**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
C6 Fishers Farm Reuse & Recycling Centre North Downs Road, New Addington, Croydon, Surrey, CR0 0LF (0.2 ha)	++	+	++	+	++		+		?	?	?		+	?	?	

Type	Transfer (Household Waste Amenity Site)
Waste Accepted	HCI
Max throughput	6,895 tpa
Licensed capacity	15,125 tpa

NOTES:
- open local authority household reuse and recycling center;
- located on the edge of the residential area adjacent to farmland;
- no other waste uses nearby;
- good access from North Downs Road;
- located within Archaeological Priority Area;
- located in close proximity to MOL and SINC to west of site and 100m north of site;
- Not located within an Air Quality Focus Area (AQFA).
- not located within any other environmental designation;
- Flood Zone 1 (low risk); and
- Low potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area;
- Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Riddlesdown;
- Ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected;
- Designing a facility that does not impact on the openness of Metropolitan Green Belt and
- Providing appropriate soft landscaping

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
28	25	25	**78**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
C7 Henry Woods Waste Management Land Adj To Unit 9, Mill Lane Trading Est, Croydon CR0 4AA (0.7 ha)	++	+	++	+	+		+		+?	+?	+?		+	?	?	

Type	Transfer + treatment
Waste Accepted	HCI and C&D
Max throughput	12,885 tpa
Licensed capacity	74,999 tpa

NOTES:
- open skip storage and waste sorting located within an existing strategic industrial area (SIL);
- existing residential uses located to the south and a site allocation for mixed uses lies to the east;
- access from road network from Mill Lane;
- no other safeguarded waste sites in Purley Way North;
- very constrained site;
- located within Archaeological Priority Area;
- located in close proximity to SINC and undesignated open space to the south of the site;
- not located within an Air Quality Focus Area (AQFA);
- not located within any other environmental designation;
- Flood Zone 1 (low risk); and
- no potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
42	25	25	**92**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR (0.37 ha)	++	++	++	+	+		+		+	+?	+?	+?	+	?	?	?

Type	Recycling and Reuse
Waste Accepted	HCI/ Hazardous
Max throughput	4,213 tpa
Licensed capacity	4,999 tpa

NOTES:
- modern double-storey warehouse with adjacent hardstanding area for metal sorting;
- within the Imperial Way SIL which comprises a mix of new and mid-century warehouses, mostly two-storey;
- good access to the strategic road network from Imperial Way;
- two waste operators in this area: Able Waste Services and New Era Metals;
- located within Archaeological Priority Area
- located in close proximity to Croydon Panorama and MOL 300m to south east of site;
- not located within an Air Quality Focus Area (AQFA);
- not located within any other environmental designation;
- Flood Zone 1 (low risk); and
- no potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank;
- Not harming biodiversity in the vicinity;
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; and
- Providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
42	25	25	**92**

C9 Peartree Farm Featherbed Lane, Croydon CR0 9AA (1.8 ha)	++	+	++	+	+		+		X	X	X		+	X	X	

Type	Transfer
Waste Accepted	HCI and C&D
Max throughput	59,282
Licensed capacity	37,500 tpa

NOTES:
- uncovered sorting facility, skip storage area along with vehicle storage and repair;
- located within the green belt surrounded by farmland;
- access from Featherbed Lane;
- no other waste uses nearby
- located within Archaeological Priority Area and Green Belt;
- not located within an Air Quality Focus Area (AQFA);
- Flood Zone 1 (low risk); and
- no potential for intensification

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
32	25	25	**82**

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- protecting the amenity of those using the nearby open spaces;
- evaluating and preserving any archaeological remains as the site is in the archaeological priority area - croydon downs;
- minimising flood risk on- and off-site;
- not harming biodiversity in the vicinity;
- ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected;
- designing a facility that does not impact on the openness of Metropolitan Green Belt; and
- providing appropriate soft landscaping

C10 Purley Oaks Reuse and Recycling Centre Brighton Road, Purley, Surrey, CR8 2BG (0.22 ha)	++	+	X	X			XX		X	X	X		+	X?	XX	

Type	Transfer
Waste Accepted	HCI
Max throughput	9,099
Licensed capacity	12,535

NOTES:
- open local authority reuse and recycling centre located within a local centre and surrounding residential neighbourhood.
- adjacent to Purley Oaks Depot;
- adjacent to a site designation for Gypsy and Traveller pitches in the Croydon Local Plan 2018;
- good access to the strategic road network from Brighton Road;
- located within Archaeological Priority Area;
- not located within an Air Quality Focus Area (AQFA);
- not located within any other environmental designation;
- Flood Zone 3 (high risk) with Flood Zone 2 (medium risk) on the periphery; and
- no potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- evaluating and preserving any archaeological remains in the archaeology priority area London to Brighton Roman Road
- not harming biodiversity in the vicinity;
- ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected
- providing appropriate soft landscaping

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
30	25	25	**80**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
C11 Safety Kleen Unit 6b, Redlands, Coulsdon, Surrey, CR5 2HT (0.28 ha)	++	++ (potentially)	++ (potentially	++ (potentially	++	+	+	+ (potentially	++	+	+	x?	+ (potentially	x?	x?	+
	NOTES: • large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear; • to the east of the site is residential housing with a buffer of green space and trees; • good access from the road network via Redlands; • no other waste uses nearby; • railway lines to the west, therefore an opportunity to use rail to transport waste; • located in close proximity to SINC 50m to east • not located within an Air Quality Focus Area (AQFA); Archaeological Priority Area or any other environmental designation; • Flood Zone 1 (low risk);				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts. SUITABILITY SCORE 40 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **90**											
C12 Stubbs Mead Depot Factory Lane, Croydon CR0 3RL (2.71 ha)						x?	xx		++				+++	x?	x?	
	NOTES: • large double-storey shed with hardstanding for vehicles; • located within the Factory Lane industrial area and away from residential uses; • there are a number of other waste facilities in this area; • access via Factory Lane; • located in close proximity to a locally listed historic park and garden to the south; • not located within any other environmental designation; • Flood Zone 2 (medium risk) and Flood Zone 3 (high risk). The north west corner of the site falls within FZ3 and the rest of the site is FZ2; and • no potential for intensification (site proposed for mixed residential and employment)				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Protecting the amenity of those using the nearby Wandle Park; • Minimising flood risk on- and off-site; • Evaluating and preserving any archaeological remains; • Not harming biodiversity in the vicinity; • Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected. SUITABILITY SCORE 42 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **92**											
C13 Solo Wood Recycling Factory Lane, Croydon CR0 3RL (2.71 ha)	+	+	+	+?	+	++	x?	+	+	+	+	?	++	+	+	+
	NOTES: • single-storey building and open storage; • located within larger industrial area adjacent to a waste transfer site and a household reuse and recycling centre but away from residential neighbourhoods; • active gas holders lie to the north-west of the site with power lines overhead; • good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236. • located within Flood Zone 2 (medium risk) and at high/medium risk of surface water flooding. • not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and • little or no potential for intensification as the site is small				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • minimising flood risk on- and off-site; • evaluating and preserving any remains in the Ampere Way archaeology priority area; • not harming biodiversity in the vicinity; and • ensuring that nearby watercourses are not harmed by the development and EA buffer zones are respected. SUITABILITY SCORE 42 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **92**											

Type	Transfer
Waste Accepted	Hazardous
Max throughput	Not operational
Licensed capacity	12,782 tpa

Type	Vehicle depot related to HH waste collection
Waste Accepted	n/a
Max throughput	n/a
Licensed capacity	n/a

Type	Wood recycling
Waste Accepted	HCI
Max throughput	5,000 tpa
Licensed capacity	n/a

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: KINGSTON

K2 Genuine Solutions Group Solutions House, Unit 1A, 223 Hook Rise South KT6 7LD (0.26 ha	++	++	++	++			+		x?	x?	x?		+	x?	x?	

Type	Recycling & Reuse
Waste Accepted	HCI
Max throughput	1,630 tpa (planning application 5,000 tpa)
Licensed capacity	74,999 tpa

NOTES:
- WEEE treatment facility located within an industrial area surrounded by similar large industrial sheds;
- two-storey office block fronting on Hook Rise South beyond which is the Kingston Bypass fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear
- residential properties lie to the east and west of the industrial area; to the north of Kingston bypass is residential properties, Swallow Park Gypsy and Traveller site and to the west of this is school playing fields
- no other waste uses nearby
- access from Hook Rise South
- located within Tolworth Key Area of Change (Kingston Neighbourhood Policy SB1)
- located in close proximity to MOL to the east of Chessington SIL and green corridor to the south of the site;
- not located within any other environmental designation; and
- Flood Zone 1 (low risk)/low potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts;
- protecting the amenity of those using the nearby Tolworth Recreation Ground, King George's Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club;
- evaluating and preserving any archaeological remains;
- not harming biodiversity in the vicinity; and
- providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
46	25	25	**96**

K3 Kingston Civic Amenity Site Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (0.7 ha including Kingston WTS)	++	++	+	+	+?	+?	+?	+?	+?	+?	+	+	+	x?	?	?

Type	Transfer
Waste Accepted	HCI
Max throughput	14,363 tpa
Licensed capacity	25,000 tpa

NOTES:
- enclosed local authority reuse and recycling centre (Household Waste Amenity Site) within an industrial area;
- surrounded by open space but away from residential uses;
- on same site as Kingston Waste Transfer Centre and close to Hogsmill Sewage Treatment Works;
- adjacent to Hogsmill River but little opportunity to transport waste by water;
- access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of the Hogsmill;
- located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) & Area of Archaeological Significance;
- located in close proximity to MOL, Green chain and SINC to the north and south of the site
- not located within Air Quality Focus Area (AQFA) or any other environmental designation;
- Flood Zone 1 (low risk); and

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
38	25	25	**88**

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve;
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains;
- Not harming biodiversity in the vicinity;
- Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected;
- Providing appropriate soft landscaping.

K4 Kingston Waste Transfer Station Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (1.3 ha including Kingston RRC)	+++	+ (potentially)	+ (potentially)	+ (potentially)	+?	+?	+?	+?	++?	+?	+?	+	++	+?	+?	+?

Type	Transfer
Waste Accepted	HCI
Max throughput	68,883 tpa
Licensed capacity	200,500 tpa

NOTES:
- Household, Commercial & Industrial Waste Transfer Station located within an industrial area;
- Double-storey enclosed shed with hardstanding for vehicles;
- surrounded by open space but away from residential uses;
- on same site as Kingston RRC (Site K3) and close to Hogsmill Sewage Treatment Works;
- adjacent to Hogsmill River little opportunity to transport waste by water;
- access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of Hogsmill;
- located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) & Area of Archaeological Significance;
- located in close proximity to MOL, Green chain and SINC to the north and south of the site;
- not located within Air Quality Focus Area (AQFA) or any other environmental designation;
- Flood Zone 1 (low risk).

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
38	25	25	**88**

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve;
- minimising flood risk on- and off-site;
- evaluating and preserving any archaeological remains;
- not harming biodiversity in the vicinity;
- ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected
- designing a facility that does not impact on the openness of Metropolitan Open Land; and
- providing appropriate soft landscaping.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: MERTON

M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA (0.06 ha)	+	+	++	+	+	+?	+	+?	++?	+?	+?	x?	+	+?	+?	+?

Type	Transfer +recycling
Waste Accepted	HCI
Max throughput	3,729 tpa
Licensed capacity	5,000 tpa

NOTES:
- Household, Commercial & Industrial Waste Transfer Station located within Willow Lane Industrial Estate;
- open area with skips.
- residential uses to the south of the site (Connect House was converted to residential use via Prior Approval);
- concentration of waste uses in Willow Lane Industrial Estate;
- road access via Wandle Way
- located within Archaeological Priority Area
- located in close proximity to areas of MOL and SINC to the east and west of Willow SIL
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 1 (low risk); and
- no potential for intensification

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- evaluating and preserving any archaeological remains; and
- providing appropriate soft landscaping.
- ensuring the safety clearances for the overhead power lines crossing the site are respected.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
44	25	25	**94**

M2 European Metal Recycling 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX (1.03 ha)	+++	+++	+++	+++	+?	+?	+	+?	++?	+?	+?	x?	+	?	+?	+?

Type	Recycling + Reuse
Waste Accepted	HCI
Max throughput	70,100 tpa
Licensed capacity	109,500 tpa

NOTES:
- collection of large double-storey warehouses and office space with hardstanding for metal sorting, vehicles and skips located in Willow Lane Industrial Estate;
- residential uses to the south of the site (Connect House converted to residential use via Prior Approval);
- already a concentration of waste uses in Willow Lane Industrial Estate;
- road access via Ellis Road, suitable for large vehicles;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC to the east and west of Willow SIL
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The majority of the site is within Flood Zone 2; and
- low potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- minimising flood risk on- and off-site;
- evaluating and preserving any archaeological remains; and
- providing appropriate soft landscaping.
- ensuring the safety clearances for the overhead power lines crossing the site are respected.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
38	25	25	**88**

M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA (0.38 ha)	+	+	++	++	?	?	x?	+?	+?	?	?	?	++	?	x?	x?

Type	Recycling
Waste Accepted	HCI
Max throughput	5,000
Licensed capacity	n/a (exempt site)

NOTES:
- facility for sorting and baling paper for recycling located in Willow Lane Industrial Estate;
- hardstanding for material sorting, vehicles and skips together with two storey portakabin office;
- residential uses to the south of the site (Connect House converted to residential use via Prior Approval);
- already a concentration of other waste uses in Willow Lane Industrial Estate;
- access via Willow Lane;
- located within Archaeological Priority Area
- located in close proximity to areas of MOL and SINC to the east and west of Willow SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk); and
- low potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains;
- Providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
38	25	25	**88**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
M4 Garth Road Re-use and Recycling Centres, 66-69 Amenity Way, Garth Road, Merton SM4 4AX (0.7 ha including M5)	++	++	++	+?	+?	+?	x?	+?	+?	+?	+?	?	++	?	?	?
	NOTES: • local authority reuse and recycling centre located within the Garth Road Industrial Estate; • the site incorporate a household reuse and recycling centre and Merton Council's LACW Transfer Station; • a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west; • there is housing adjacent to the site at Beaver Close; • access is gained via Garth Road, which also has houses along it; • not located within Air Quality Focus Area (AQFA), Archaeological Priority Area or any other environmental designation; • Flood Zone 1 (low risk); and • no potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; and • providing appropriate soft landscaping.							
									SUITABILITY SCORE 36	AVAILABILITY SCORE 25	VIABILITY 25	TOTAL SITE SCORE **86**				
Type: Re-use, recycling and transfer Waste Accepted: LACW Max throughput: 14,594 tpa Licensed capacity: 25,000 tpa																
M5 Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merto SM4 4AX (0.45 ha)	++	++	+?	+?	+?	+?	x?	+?	+?	+?	+?	?	++	?	?	?
	NOTES: • local authority reuse and recycling centre located within the Garth Road Industrial Estate; • the site incorporate a household reuse and recycling centre and Merton Council's LACW Transfer Station; • a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west; • there is housing adjacent to the site at Beaver Close; • access is gained via Garth Road, which also has houses along it; • not located within Air Quality Focus Area (AQFA), Archaeological Priority Area or any other environmental designation; • Flood Zone 1 (low risk); and • no potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; and • providing appropriate soft landscaping.							
									SUITABILITY SCORE 36	AVAILABILITY SCORE 25	VIABILITY 25	TOTAL SITE SCORE **86**				
Type: Re-use, recycling and transfer Waste Accepted: LACW Max throughput: 14,594 tpa Licensed capacity: 25,000 tpa																

SA FRAMEWORK OBJECTIVES

Site	(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M6 George Killoughery 41 Willow Lane, Merton CR4 4NA	++	++	?	?	+?	+?	x?	+?	+?	+?	+?	?	++	?	?	?
M7 LMD Waste Management (Abbey Industrial Estate) Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA(0.06 ha)	++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	?	?	?
M8 LMD Waste Management Wandle Way 32 Willow Lane, Merton CR4 4NA (0.07 ha)	+++	++	?	?	+?	+?	x?	+?	+?	+?	+?	?	++	+?	?	?

M6 George Killoughery

Type	Transfer
Waste Accepted	C&D
Max throughput	71,253 tpa
Licensed capacity	74,999 tpa

NOTES:
- a large site located within Willow Lane industrial estate comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste;
- concentration of waste uses within this industrial estate;
- River Wandle lies to the west of the sit but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow Lane SIL;
- not located within or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2;
- low potential for intensification

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- sesigning the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting residential amenity for nearby properties, especially with regard to air emissions and noise impacts;
- minimising flood risk on- and off-site;
- evaluating and preserving any archaeological remains;
- Not harming biodiversity in the vicinity;
- designing a facility that does not impact on the openness of Metropolitan Open Land;
- providing appropriate soft landscaping; and
- ensuring nearby watercourses are not harmed and there is an 8-metre buffer zone from the top of the riverbank.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
32	25	25	**82**

M7 LMD Waste Management (Abbey Industrial Estate)

Type	Transfer
Waste Accepted	C&D
Max throughput	24,444 tpa
Licensed capacity	74,999 tpa

NOTES:
- mainly open hardstanding site located within Willow Lane industrial estate surrounded by similar industrial properties;
- Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south
- there is a concentration of waste uses in Willow Lane Industrial Estate.
- access from Wandle Way;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 1 (low risk);
- no potential for intensification (given the small scale and lack of permission for waste use for this site).

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- evaluating and preserving any archaeological remains; and
- providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
44	25	25	**94**

M8 LMD Waste Management Wandle Way

Type	Transfer
Waste Accepted	C&D
Max throughput	38,738 tpa
Licensed capacity	50,000 tpa

NOTES:
- double-storey shed with attached single-storey offices located within Willow Lane industrial estate;
- Connect House, which was converted to residential use via Prior Approval, lies opposite the site;
- there is a concentration of waste uses in the Willow Lane Industrial Estate;
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk); and
- unsuitable for intensification due to proximity of Connect House and the throughput ratio is above average for this type of facility.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains; and
- Providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
38	25	25	**88**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
M9 Maguire Skips (Wandle Way) (0.19 ha) Storage Yard Wandle Way, Merton CR4 4NB	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • mainly open hardstanding for skips and sorting together with a double-storey covered area located within Willow Lane industrial estate; • Connect House, converted to residential use via Prior Approval, lies opposite the site; • there is a concentration of waste uses in the Willow Lane Industrial Estate. This facility lies near residential properties and has been the subject of noise and planning enforcement investigations; • access via Wandle Way; • located within Archaeological Priority Area; • located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow SIL; • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (medium risk); and • unsuitable for intensification since the throughput ratio is above average for this type of facility				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • evaluating and preserving any archaeological remains; and • providing appropriate soft landscaping.													
Type: Transfer Waste Accepted: C&D Max throughput: 58,150 tpa Licensed capacity: 74,999 tpa					SUITABILITY SCORE: 34				AVAILABILITY SCORE: 25				VIABILITY: 25			TOTAL SITE SCORE: **84**
M10 Powerday (Weir Court) (0.3 ha) 36 Weir Court, Merton SW19 8UG	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • enclosed double-storey shed with outside hardstanding space located within Durnsford Road SIL; • Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site; • three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and Reston Waste Transfer and Recovery. • Access via Weir Road to strategic road network; • although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; • located within Archaeological Priority Area • located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and • low potential for intensification (throughput per hectare is good for this type of facility).				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • evaluating and preserving any archaeological remains; • not harming biodiversity in the vicinity; • ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected; • designing a facility that does not impact on the openness of metropolitan open land; • providing appropriate soft landscaping; and • ensuring the safety clearances for the overhead power lines crossing the site are respected.													
Type: Transfer Waste Accepted: C&D Max throughput: 53,313 tpa Licensed capacity: 74,999 tpa					SUITABILITY SCORE: 42				AVAILABILITY SCORE: 25				VIABILITY: 25			TOTAL SITE SCORE: **92**
M11 Morden Transfer Station (0.8 ha) Amenity Way, Merton SM4 4AX	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • double-storey industrial shed with hardstanding; • there is a number of waste uses in this area, including Merton Reuse and Recycling Centre. • site is adjacent to residential properties in Beaver Close; • access from Amenity Way • located in close proximity to Green Corridor and a SINC on the north-western boundary. Cemetery designated MOL; • not located within an Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk); and • low potential for intensification				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • protecting the amenity of those using the adjacent cemetery; • not harming biodiversity in the vicinity; • designing a facility that does not impact on the openness of Metropolitan Open Land; and • providing appropriate soft landscaping.													
Type: Transfer Waste accepted: HCI + C&D Max throughput: 39,950 tpa Licensed capacity: 74,999 tpa					SUITABILITY SCORE: 34				AVAILABILITY SCORE: 25				VIABILITY: 25			TOTAL SITE SCORE: **84**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
M12 NJB Recycling (0.35 ha) 77 Weir Road, Merton SW19 8UG	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • enclosed two and three-storey sheds and warehouses for vehicles located within Durnsford Road SIL; • Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site. The site is also adjacent to a Gypsy and Travellers site in LB Wandsworth; • there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery; • access via Weir Road to strategic road network; • although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; • located within Archaeological Priority Area • located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); • low potential for intensification (throughput per hectare is good for this type of facility).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • minimising flood risk on- and off-site; • protecting the residential amenity for nearby properties e.g. air emissions and noise impacts; • protecting the amenity of those using the future Wandle Valley Regional Park; • evaluating and preserving any archaeological remains; • not harming biodiversity in the vicinity; • ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development; • designing a facility that does not impact on the openness of metropolitan open land; • providing appropriate soft landscaping. SUITABILITY SCORE 36 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **86**							
Type: Transfer Waste Accepted: C&D Max throughput: 48,687 tpa Licensed capacity: 75,000 tpa																
M13 One Waste Clearance Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA (0.1 ha)	+++	++	++	+	+?	+?	+?	+?	+?	+	+	?	++	+?	?	?
	NOTES: • waste transfer station (fully enclosed unit) within Abbey Industrial Estate which forms part of Willow Lane SIL; • surrounded by other businesses on the industrial estate including waste management facilities, vehicle repairers and manufacturing industries; • Connect House, converted to residential use via Prior Approval, lies to the south of the site; • access from Wandle Way via a purpose-built access and driveway onto the industrial estate; • located within Archaeological Priority Area; • located in close proximity to areas of MOL and SINC which lie to the east and west; • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk); and • low potential for intensification since throughput per hectare is good (based on the few weeks facility in operation).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • evaluating and preserving any archaeological remains; and • providing appropriate soft landscaping. SUITABILITY SCORE 44 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **94**							
Type: Transfer+ recycling Waste Accepted: HCI and CD&E Max throughput: 20,000 tpa Licensed capacity: 75,000 tpa																
M14 Reston Waste Transfer and Recovery Unit 6, Weir Road, Merton SW19 8UG (0.28 ha)	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • enclosed three-storey shed and warehouses with outside hardstanding space for vehicles located within Durnsford Road SIL; • Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site; • there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery; • access via Weir Road to strategic road network; • although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; • located within Archaeological Priority Area; • located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and • low potential for intensification (throughput per hectare is good for this type of facility).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts • evaluating and preserving any archaeological remains • not harming biodiversity in the vicinity • ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development • designing a facility that does not impact on the openness of Metropolitan Open Land; and • providing appropriate softy landscaping. SUITABILITY SCORE 36 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **86**							
Type: Transfer Waste Accepted: C&D Max throughput: 71,595 tpa Licensed capacity: 74,999 tpa																

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
M15 Riverside AD Facility 43 Willow Lane, Merton CR4 4NA (0.87 ha)	+++	+++	+++	+++	++	+?	+?	++	+?	+	+	?	++	+?	+?	+?
	NOTES • Anaerobic Digestion (AD) facility which takes mixed garden and kitchen waste,; • the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane); • comprised of double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste; • concentration of waste uses within this industrial estate; • the River Wandle is located adjacent but no real potential for transportation of waste by water; • Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site • vehicle access to the site is provided via an existing route running along the northwest boundary; • located within Archaeological Priority Area; • located in close proximity to land designated as MOL, Open Space, a Green Corridor and a SINC which lie to the east and west of Willow Lane SIL. A Conservation Area is located to the north east of the site; • not located within an Air Quality Focus Area or any other environmental designation; • Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2. • low potential for intensification (since the throughput per hectare is good for this type of facility).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • evaluating and preserving any archaeological remains; • not harming biodiversity in the vicinity; • ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development; • designing a facility that does not impact on the openness of Metropolitan Open Land; and • providing appropriate soft landscaping. SUITABILITY SCORE 32 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **82**						
Type: Management (AD) Waste Accepted: Mixed garden & kitchen waste Max throughput: 36,341 tpa Licensed capacity: 99,999 tpa																
M16 Riverside Bio Waste Treatment Centre 43 Willow Lane, Merton CR4 4NA (0.87 ha)	+++	+++	+++	+++	++	+?	+?	++	+?	+	+	?	++	+?	+?	+?
	NOTES • enclosed in-vessel composting facility which takes mixed garden and kitchen waste • the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane); • there is already concentration of waste uses within this industrial estate; • the River Wandle is located adjacent but no real potential for transportation of waste by water; • Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site; • vehicle access to the site is provided via an existing route running along the northwest boundary; • located within Archaeological Priority Area; • close to MOL, Open Space, a Green Corridor and SINC which lie to the east and west of Willow Lane SIL. • not located within an Air Quality Focus Area or any other environmental designation; • Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2; and • low potential for intensification (since the throughput per hectare is good for this type of facility);								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • minimising flood risk on- and off-site; • evaluating and preserving any archaeological remains; • not harming biodiversity in the vicinity; • ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development; • designing a facility that does not impact on the openness of Metropolitan Open Land; and • providing appropriate soft landscaping. SUITABILITY SCORE 32 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **82**						
Type: Composting Waste Accepted: HCI Max throughput: 51,715 tpa Licensed capacity: 100,000 tpa																
M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA (0.5 ha)	+++	+++	+++	+++	++	+?	+?	++	+?	+	+	?	++	+?	+?	+?
	NOTES: • a large site comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste located within the Willow Lane industrial estate; • concentration of waste uses within this industrial estate; • River Wandle lies to the west of the sit but no real potential for transportation of waste by water; • Connect House, converted to residential use via Prior Approval, lies to the north east of the site • access via Willow Lane; • located within Archaeological Priority Area; • located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL; • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 2 (medium risk); • low potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts • minimising flood risk on- and off-site • evaluating and preserving any archaeological remains • providing appropriate soft landscaping. SUITABILITY SCORE 38 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **88**						
Type: Treatment to produce soil Waste Accepted: C&D Max throughput: 804 tpa Licensed capacity: 75,000 tpa																

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M18 Wandle Waste Management, Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA (0.07 ha)	+?	+?	x	x	?	?	+?	?	?	?	?	?	+	?	x?	?

Type	Transfer
Waste Accepted	Hazardous
Max throughput	141 tpa
Licensed capacity	24,999 tpa

NOTES:
- double-storey shed located within the Willow Lane industrial estate;
- there is a concentration of waste uses within this industrial estate;
- Connect House, converted to residential use via Prior Approval, lies to the north east of the site
- River Wandle lies to the west of the sit but no real potential for transportation of waste by water;
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 1 (low risk);
- unlikely to be potential for intensification. The throughput on this site is very small and it is not clear what operation takes place on the site as no permission seems to exist for a hazardous waste transfer facility for this site.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building.
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site.
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank; and
- providing appropriate soft landscaping and regard to the adjacent Roundshaw Park.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
44	25	25	**94**

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: SUTTON

S1 777 Recycling Centre, 154a Beddington Lane CR0 4TE (0.97 ha)	+++	+++	+++	+++ (potentially)	++	+?	+?	++	x?	x?	+?	?	+++	+?	+?	+?

Type	Recycling & Reuse
Waste Accepted	HCI and C&D
Max throughput	56,912 tpa
Licensed capacity	372,600 tpa

NOTES:
- large double-height and triple-height modern industrial sheds and hardstanding for skip storage in Beddington SIL;
- there is a concentration of waste uses in Beddington SIL. Also located nearby are the Beddington Farmlands EfW facility, the Croydon Transfer Station and a concrete batching operation at 154 Beddington Lane;
- the site backs onto tram lines to the rear;
- HGV access from Coomber Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within Archaeological Priority Area;
- located close to Wandle Valley Regional Park and MOL to the west of Beddington Lane;
- not located within Air Quality Focus Area or within any other environmental designations;
- Flood Zone 1 (low flood risk); and
- no potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- evaluating and preserving any archaeological remains;
- providing appropriate soft landscaping;
- ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and
- the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
42	25	25	**92**

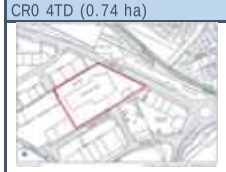
S2 Beddington Farmlands ERF Energy Recovery Facility (ERF) Beddington Waste Management Facility, 105 Beddington Lane CR0 4TD (5.4 ha)	+++	+++	+++	+++	+++	+	+	++	+?	?	+	?	+++	+?	+?	+?

Type	Energy from Waste
Waste Accepted	HCI
Max throughput	275,000 tpa
Licensed capacity	302,500 tpa

NOTES:
- large energy recovery facility (ERF) located within the boundaries of the Wandle Valley Regional Park, adjacent to Viridor Recycling Facility and Beddington Farm landfill site;
- concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL;
- access from Beddington Lane and the vehicle routing to the site is through Beddington SIL. There is traffic congestion in nearby Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within MOL, Metropolitan Green Chain, SINC, Wandle Valley Regional Park and in Archaeological Priority Area;
- not located within Air Quality Focus Area;
- Low flood risk (Flood Zone 1);
- no potential for intensification. This is a new facility and therefore no opportunities to upgrade or intensify.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
34	25	25	**84**

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts
- protecting the amenity of those using the future Wandle Valley Regional Park
- evaluating and preserving any archaeological remains
- not harming biodiversity in the vicinity
- ensuring nearby watercourses are not harmed by the development;
- designing a facility that does not impact on the openness of MOL;
- providing appropriate soft landscaping; and
- ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and
- the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TG (0.2 ha)	+	+	+	+?	+?	+?	+	++	x?	x?	+	+?	+	+?	+?	+?
	NOTES: • modern double-height industrial units incorporating office space located on the Bedddington Lane industrial estate at the northern end of the Beddington SIL; • there is concentration of waste uses in the Beddington SIL and at the Beddington Waste Management Facility (105 Beddington Lane); • access is from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • located close to MOL, Metropolitan Green Chain, SINC and Wandle Valley Regional Park on the west side of Beddington Lane; • not located within Air Quality Focus Area; • Low flood risk (Flood Zone 1); • low potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of nearby properties, especiallywith regard to air emissions and noise impacts; • protecting the amenity of those using the future Wandle Valley Regional Park; • evaluating and preserving any archaeological remains; • not harming biodiversity in the vicinity; and • the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.							
Type: Transfer Waste Accepted: Hazardous Max throughput: 9,601 Licensed capacity: 75,000									SUITABILITY SCORE 42	AVAILABILITY SCORE 25	VIABILITY 25	TOTAL SITE SCORE **92**				
S4 Croydon Transfer Station Endeavour Way, Beddington Farm Road, Sutton CR0 4TD (0.74 ha)	++	++ (potentially)	++ (potentially)	+++ (potentially)	+ (potentially)	+?	+	++	x?	x?	+	+?	+	+?	+?	+?
	NOTES: • the site lies in Beddington SIL and consists of double- and triple-height enclosed sheds with hardstanding for vehicles; • There is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods; • Access from Endeavour Way There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area; • low flood risk (Flood Zone 1); and • some potential for intensification since the site is operating below the average throughput for this type of facility.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Evaluating and preserving any archaeological remains; • Providing appropriate soft landscaping; and • the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.							
Type: Transfer Waste Accepted: HCI Max throughput: 27,799 tpa Licensed capacity: 75,000 tpa									SUITABILITY SCORE 42	AVAILABILITY SCORE 25	VIABILITY 25	TOTAL SITE SCORE **92**				
S5 Hinton Skips Land to the rear of 112 Beddington Lane, Sutton CR0 4YZ	++	++ (potentially)	++ (potentially)	+++ (potentially)	+ (potentially)	+?	+	++	x?	x?	+	+?	+	+?	+?	+?
	NOTES: • the site lies within Beddington SIL and consists of an enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles; • there is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods; • the site does not have direct frontage onto the Beddington Lane being set back some 400m from the highway at the end of a made up access way that also provides access to a number of other businesses. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • located in close proximity to Archaeological Priority Area Scheduled monument 80m to the west • not located within Air Quality Focus Area or any other environmental designation; • medium flood risk (Flood Zone 2); and • some potential for intensification since the estimated throughput is lower than the average throughput for this type of facility and the planning permission states that up to 50,000 tonnes will be managed on the site.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • developers planning to intensify the safeguarded site should pay particular attention to: • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • minimising flood risk on- and off-site; • evaluating and preserving any archaeological remains; and • providing appropriate soft landscaping; • ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and • the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.							
Type: Transfer + treatment of skip waste Waste Accepted: C&D Max throughput: 8,000 tpa Licensed capacity: 75,000 tpa									SUITABILITY SCORE 40	AVAILABILITY SCORE 25	VIABILITY 25	TOTAL SITE SCORE **90**				

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
S6 Hydro Cleansing, Hill House, Beddington Farm Road CR0 4XB	++	++	++	+?	+	+?	+?	++	x?	x?	+?	+?	++	+?	+?	+?
	NOTES: • the site lies within Beddington SIL adjacent to the Surrey Jaguar Centre and the Royal Mail Centre and consists of a two-storey 1960s office block with facility to rear • there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; • access from Beddington Farm Road. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designation; • low flood risk (Flood Zone 1); and • low potential for intensification since the throughput is typical for this type of facility.				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • evaluating and preserving any archaeological remains; and • providing appropriate soft landscaping. SUITABILITY SCORE 44 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **94**								
Type: Transfer +treatment Waste Accepted: Wastewater/CD&E Max throughput: 13,912 tpa Licensed capacity: 100,000 tpa																
S7 Kimpton Park Way Civic Amenity Site Kimpton Park Way SM3 9QH (0.44ha)	++	++	++	++	+	+?	+	+	+?	+?	+?	+?	++	+	+?	+?
	NOTES: • open local authority reuse and recycling centre located in the north-west of the Kimpton SIL; • access from the road network via Kimpton Park Way and Minden Road; • located close to Kimpton Linear Park, which is designated as green chain, MOL and SINC; • not located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designations; • good access to strategic road network; • low flood risk (Flood Zone 1); and • some potential for intensification.				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of nearby properties, especially with regard to air emissions and noise impacts • protecting the amenity of those using the nearby Kimpton Linear Park • designing a facility that does not impact on the openness of Metropolitan Open Land; and • providing appropriate soft landscaping; and • ensuring the nearby underground electricity cable is neither damaged nor made inaccessible. SUITABILITY SCORE 44 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **94**								
Type: CA Site Waste Accepted: HCI Max throughput: 14,799 tpa Licensed capacity: 24,999 tpa																
S8 King Concrete 124 Beddington Lane CR0 4YZ (0.6 ha)	+++ (potentially)	+++ (potentially)	++ (potentially)	++ (potentially)	+?	+?	+	+	x?	x?	+?	+?	++	+?	+?	+?
	NOTES: • the site lies within Beddington SIL and consists of an open site for concrete production and aggregates recovery; • there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; • access from Beddington Lane and also nearby in Beddington Waste Management Facility, 105 Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designation; • potential for intensification since this site is managing well under the average throughput for this type of facility. The permission states that the facility will recycle 20,000 tpa of CD&E waste on site.				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • developers planning to intensify the safeguarded site should pay particular attention to: • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • evaluating and preserving any archaeological remains • providing appropriate soft landscaping; • ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and • the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic SUITABILITY SCORE 30 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE **80**								
Type: Transfer Waste Accepted: C&D Max throughput: 1,060 tpa Licensed capacity: 74,999 tpa																

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
S9 Premier Skip Hire Unit 12, Sandiford Road,SM3 9RD (0.1 ha)	++	++	+	+ (potentially)	+ (potentially)	+?	+	+	+?	+?	+	+?	+	+?	+?	+?

Type	Recycling + transfer
Waste	HCI and C&D
Max throughput	12,000 tpa
Licensed cap.	75,000 tpa

NOTES:
- a two-storey office and warehouse building with hardstanding for skip storage located within the Kimpton SIL;
- the site is near to Kimpton household recycling and reuse centre (Site S7 above);
- the closest residential properties are 75-100m to the south and west of the site on Hamilton Avenue
- good road access to Sandiford Road via Kimpton Road;
- located close to SINC (Pyl Brook) to south and west;
- not located within Archaeological Priority Area; Air Quality Focus Area or any other environmental designations;
- low flood risk (Flood Zone 1); and
- low potential for intensification

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and
- providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
46	25	25	**96**

S10 Raven Recycling Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR (0.25 ha)	+++	+	+?	?	+?	+?	+?	+?	+?	+?	+?	?	+	+?	?	?

Type	Transfer
Waste Accepted	HCI and C&D
Max throughput	15,224 tpa
Licensed cap.	74,999 tpa

NOTES:
- the site lies within Beddington SIL and consists of double-height enclosed sheds with hardstanding for skips;
- there is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane which are mostly located away from residential areas;
- access from Endeavour Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within Archaeological Priority Area;
- not located within Air Quality Focus Area or any other environmental designation;
- low flood risk (Flood Zone 1); and
- low potential for intensification the throughput per hectare is average for this type of facility.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building.
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and
- providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
42	25	25	**92**

S11 TGM Environmental 112 Beddington Lane, Sutton CR0 4TD	+	+	+?	?	?	+?	x?	+?	?	?	+?	?	+	?	?	?

Type	Transfer
Waste Accepted	HCI
Max throughput	15,000 tpa
Licensed cap.	15,000 tpa

NOTES:
- the site occupies the land at the front of 112 Beddington Lane within Beddington SIL and consists of waste paper and waste cardboard recovery and transfer facility comprising a weigh bridge, portacabin offices, parking and areas for sorting and baling (bulking for onward reprocessing of paper and plastic);
- Viridor EfW and Beddington Sewage Treatment Works lie to the west. A Wickes DIY & Trade supplies store is located immediately to the north of the application site, and CPI Group a printing and publishing company are located in an industrial unit immediately to the south;
- there is a concentration of waste uses in Beddington SIL mostly located away from residential areas. However the closest residential uses are around 40m to the west on the opposite side of Beddington Lane in Harrington Close;
- access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within Archaeological Priority Area and in close proximity to a Scheduled monument 80m to the west;
- not located within Air Quality Focus Area or any other environmental designation;
- medium flood risk (Flood Zone 2); and
- low potential for intensification. The operation has been relocated from 156 Beddington Lane and the additional space enables baling on site which did not take place on the previous site. The throughput is average

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- minimising flood risk on- and off-site;
- evaluating and preserving any archaeological remains; and
- providing appropriate soft landscaping.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
40	25	25	**90**

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOYMENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
S12 Country Waste Skip Hire 79-85 Beddington Lane, Sutton CR0 4TH (2.8 ha)	++	++	+	+?	+?	+?	+	+	+?	+?	+	+?	+	+?	+?	+?

Type	Treatment with transfer
Waste Accepted	HCI + C&D
Max throughput	Not published yet
Licensed cap.	350,000 tpa

NOTES:

- the site is currently vacant but the newly permitted development is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring;
- there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas;
- access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within Archaeological Priority Area;
- located adjacent to MOL, Metropolitan Green Chain SINC and Wandle Valley Regional Park
- not located within Air Quality Focus Area or any other environmental designation;
- low flood risk (Flood Zone 1); and
- no potential for intensification. The site has only recently been granted planning permission so no increase in the volumes of waste managed is likely to take place

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting the residential amenity of nearby properties especially with regard to air emissions and noise impacts
- protecting the amenity of those using the future Wandle Valley Regional Park;
- evaluating and preserving any archaeological remains
- not harming biodiversity in the vicinity
- ensuring nearby watercourses are not harmed by the development
- designing a facility that does not impact on the openness of Metropolitan Open Land; and
- ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and
- the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic.

SUITABILITY SCORE	AVAILABILITY SCORE	VIABILITY	TOTAL SITE SCORE
36	25	25	**86**

13. Conclusions

13.1 This SA Report assesses the extent to which the draft South London Waste Plan (SLWP) Submission Version, when compared to reasonable alternatives, will help to deliver the environmental, economic and social objectives of sustainable development while achieving self-sufficiency in the management of South London's future waste arisings over the plan period from 2021-36. It has been published to inform public consultation on the draft SLWP prior to submission to the Government between 4 September and 22 October in accordance with Regulation 19 of the Town and Country Planning Act (Local Planning) Regulations 2012 (Regulation 19 consultation).

13.2 The report has been prepared in line with best practice and meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in government planning practice guidance and the SEA regulations respectively. Accordingly, it provides a comprehensive review of current and future projected waste arisings within the plan area over the next 15 years; existing waste management sites, throughput and capacity; the new London Plan apportionment targets for the management of household and commercial & industrial (C&I) waste; the national, sub-regional and local policy context; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the proposed policies and waste sites on the sustainability objectives making up the SA Framework.

13.3 It is soundly based upon the best available local evidence for each of the four boroughs and draws upon the initial analysis of site throughput, capacity and environmental constraints set out in the South London Technical Paper prepared by Anthesis consultants in June 2019, subsequent detailed site appraisal work undertaken by the four boroughs in oder to assess site suitability, availability and viability, updated information from site operators and consultation responses.

13.4 The report builds upon the SA Scoping Report published in September 2019 and the previous SA Report on the SLWP Issues and Preferred Options document published in October 2019. As part of the appraisal process, the SA Framework has been refined to take account of comments from the Environment Agency, Natural England and Historic England

13.5 The draft SLWP Submission Version now sets out an amended Vision and revised plan objectives for the management of South London's waste over the next 15 years which better reflect the following 10 strategic and development management policies.

Strategic Policies

- **WP1 Strategic Approach to Household and Commercial and Industrial Waste:**
- **WP2 Strategic Approach to Other Forms of Waste**: This policy has been amended to reflect the move from a shortfall in C&D waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of Surrey County Council (see Representation C18/144) amongst other South East councils.

Development Management Policies

- **WP3 Existing Waste Sites** (unchanged);
- **WP4 Sites for Compensatory Provision** (unchanged);
- **WP5 Protecting and Enhancing Amenity** (unchanged);
- **WP6 Sustainable Design and Construction of Waste Facilities**: This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that,

where appropriate, the sustainability credentials of a waste development can been measured against the BRE's 'CEQUAAL'[1] scheme in place of the BREAAM New Construction scheme;

- **WP7 The Benefits of Waste** (unchanged);
- **WP8 New Development Affecting Waste Sites**: This is a new policy to reflect the requests from SUEZ (see Representation C20/10) and Veolia (see Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy:
- **WP9 Planning Obligations** (unchanged);
- **WP10 Monitoring and Contingencies:** This is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies

13.6 The SA Matrix in Section 12 demonstrates that proposed Policies WP1-WP10 for inclusion in the new SLWP 2021-36 (Option 1), are likely to have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

13.7 While Option 1 essentially carries forward the same overall strategic approach which was identified and assessed as the 'preferred option' in the previous SA Report on Issues and Preferred Options, the SA Matrix demonstrates that the two newly introduced policies (WP8 'Strategic Approach to Other Forms of Waste' and WP10 'Monitoring and Contingencies') and the changes made to Policies WP2 'Strategic Approach to Other Forms of Waste' and WP6 'Sustainable Design and Construction of Waste Facilities' will significantly improve the plan by making a greater contribution to sustainability objectives. Amongst other things, this outcome reflects the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036.

13.8 Overall, the most important sustainability benefits of the draft SLWP Submission Version include:

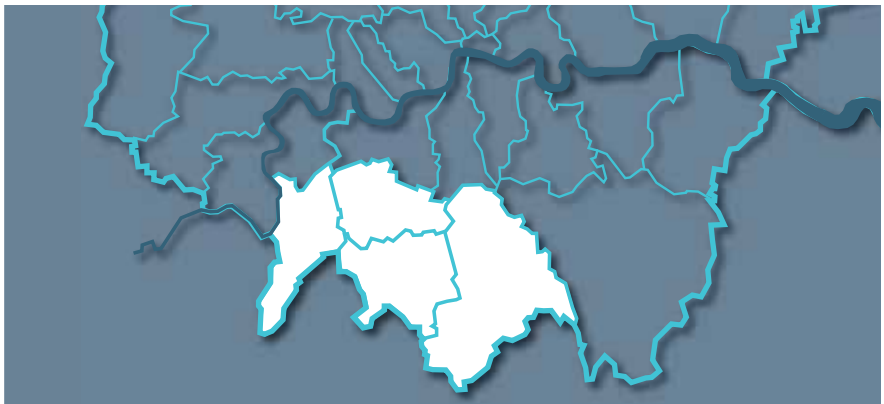
- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;

[1] the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at https://www.ceequal.com/

- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
- minimising **air pollution** and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery** towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

13.9 Stakeholder feedback on both the draft plan and this SA Report arising from the Regulation 19 consultation stage will inform the preparation of the final SLWP for submission to the government. The final version of the SA Report, together with the outcome of Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) screening will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.

- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London **Waste Plan**

Sustainability Appraisal (SA) Appendices

incorporating Strategic Environmental Assessment (SEA)

on Draft for Submission to Government

September 2020

CROYDON
www.croydon.gov.uk

THE ROYAL BOROUGH OF KINGSTON UPON THAMES

merton

Sutton

Appendix 1

EQUALITIES IMPACT ASSESSMENT (EqIA)

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

Contents

1. Background

Introduction

1.1 This Equalities Impact Assessment (EqIA) report assesses the impacts of each of the proposed waste policies included in the draft South London Waste Plan (SLWP) Submission Version on the key equality target groups within the four partner boroughs. It has been published alongside the Sustainability Appraisal (SA) Report to inform public consultation on the draft SLWP between 4 September and 22 October prior to the formal submission of the plan to the Secretary of State for Housing, Communities and Local Government (DHCLG) for Examination-in-Public.

1.2 As with the SA Report, the impacts of the proposed SLWP Submission Version (Option 1) have been assessed alongside the following strategic alternatives:

- **Option 1: Proposed Plan (Meet Apportionment[73])** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP Submission Version;
- **Option 2: Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged; and
- **Option 3¨Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

1.3 Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and SWP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036:

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged.
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the current SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

1.4 In considering the impacts of Option 1 (Proposed Plan), the potential benefits of the newly introduced policies (WP8 and WP10) and the changes made to Policies WP2 and WP6 on equalities target groups have also been assessed in relation to the draft policies put forward at the issues and preferred options stage.

1.5 While in many respects, the proposed SLWP Policies WP1-WP10 (Option 1) carry forward and build upon the preferred policies in the Issues and Preferred Options document, there are number of differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation.

1.6 This report updates the previous EqIA Report on SLWP Issues and Preferred Options published for public consultation between 31 October and 22 December 2019.

[73] Policy SI 8 of the 'Intend to Publish' London Plan (December 2019) sets out new borough apportionment targets for the management of household and commercial & industrial (C&I) waste over the period of the London Plan to 2041. Bassed on this trajectory, the amount of household and C&I waste which needs to be managed within the four South London boroughs in 2036 is 929,750 tonmnes per annum

What is an EqIA?

1.7 An EqIA is defined by the Equality and Human Rights Commission[74] as "a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody". EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making.

1.8 EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including joint development plan documents) from April 2011, local authorities still have a legal duty to "give due regard" to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying.

1.9 When applied to planning policy documents such as the SLWP, the first stage of EqIA involves screening to identify the potentially beneficial and adverse impacts of emerging policies and proposals on each of the specific equality target groups and to identify any gaps in knowledge. Then - where any potentially significant adverse effects are identified and/or if the potential impact is not intended and/or illegal - a full stage 2 assessment should be carried out. This should focus on the significant negative impacts and identify possible mitigation measures. Consultation with stakeholders and members of equality target groups should be undertaken during this phase.

1.10 This document constitutes the full stage 2 assessment.

Legislation

1.11 The requirement to consider the impacts of policies and strategies upon certain equality target groups through EqIA process arises from the following legislation.

Race Relations (Amendment) Act 2000

1.12 This amendment required local authorities to be pro-active in promoting racial equality by undertaking a Race Equality Impact Assessment of their strategies and plans.

Disability Discrimination (Amendment) Act 2005

1.13 The Act required local authorities to promote equality of opportunity for disabled people by ensuring that their policies, practices, procedures and services do not discriminate against them.

Equality Act 2006

1.14 The Act established the Commission for Equality and Human Rights (CEHR) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC).

Gender Equality Duty 2007 (as required by the Equality Act 2006)

1.15 This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their

[74] see http://www.equalityhumanrights.com

existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

Equality Act 2010

1.16 The Equality Act 2010 brought together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act simplifies, strengthens and harmonises the previously existing legislation in order to protect individuals from unfair treatment and promotes a fair and more equal society. The main pieces of legislation that have merged are:

- Sex Discrimination Act 1975;
- Race Relations Act 1976;
- Disability Discrimination Act 1995;
- Employment Equality (Religion or Belief) Regulations 2003;
- Employment Equality (Age) Regulations 2006;
- Equality Act 2006, Part 2; and
- Equality Act (Sexual Orientation) Regulations 2007.

1.17 Section 149 of the Act introduces a 'general duty' on all public sector bodies to have regard to the following considerations in the exercise of their functions:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.18 In seeking to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic', public bodies should have regard to:

- removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1.19 The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

LB Croydon Equality Policy 2016-2020

1.20 Croydon's Equality Policy 2016-20 and the supporting Opportunity and Fairness Plan sets out the following aims and objectives.

Aims

The council acknowledges its statutory equality duty as a Public Sector employer under s149 of the Equality Act 2010. In particular, whilst we exercise our functions we aim to

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Objectives

Employment
- to increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.

Child poverty
- to reduce the rate of child poverty especially in the six most deprived wards.

Attainment
- to improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards.

Community safety
- to increase the percentage of domestic violence sanctions;
- to increase the reporting and detection of the child sexual offences monitored; and
- to reduce the number of young people who enter the youth justice system.

Social isolation
- to reduce social isolation amongst disabled people and older people.

Community cohesion
- to improve the proportion of people from different backgrounds who get on well together.

Health
- to reduce differences in life expectancy between communities.

RB Kingston Equality & Community Cohesion Strategy 2016-2020

1.21 Kingston's Equality and Community Cohesion Strategy 2016-20 sets out the following aims. .

Aim

As one of the largest employers and service providers in the area, the Royal Borough of Kingston is committed to eliminating discrimination in all its forms and working to a cohesive community that respects differences and values human rights. We will work to challenge discrimination against age, ethnicity, gender, transgender people, disabled people, individuals who practise a religion and those who do not have any religious beliefs or practice other beliefs, people with specific sexual preference and people across all levels of economic status. We recognise that some individuals suffer from multiple discrimination and we will work together with our partners to alleviate this.

Objectives

Knowing our community

- to appreciate the changing nature of the population of the borough;
- to better understand who lives in the borough and be aware of their needs;
- to improve on how to gather, use and share the information appropriately.

Place Shaping, leadership, partnership and organisational commitment

- to provide strong leadership and ensure equality, diversity and community cohesion are embedded throughout the council by politicians and senior management;
- to engage and influence our partners to work together to achieve the equality objectives by setting clear equality priorities that support each other;
- to ensure that the procured services meet our equality obligations;
- to take responsibility for the delivery of equality and community cohesion work and to manage and monitor its performance more effectively; and
- to continue to improve on the equality impact assessment process and setting of targets

Community engagement and satisfaction:

- to improve the involvement and engagement of the diverse communities within the borough;
- to ensure the communities feel their views are taken into account and to provide feedback;
- to challenge negative views and promote more cohesive communities;
- to make communities feel secure and safe in our diverse society.

Responsive services and customer care:

- to ensure that everyone entitled to services is able to access them;
- to make our service provision fair, equitable, transparent and consistent;
- to understand the impact changes can have on the lives of service users, their family and carers;
- to improve our communication and accessibility for all services users;
- to encourage feedback, compliments as well as complaints, and respond to them;
- to regularly monitor equality and cohesion objectives at departmental management meetings
- to carry out equality monitoring of our service users and analyse the data; and
- to act on any adverse trends that are identified

A modern and diverse workforce:

- to have employment policies and practices that are fair, flexible and address equality issues;
- to ensure that employees feel supported at work and that their experiences are positive;
- to strive for a workforce that represents the community it serves;
- to provide all employees with opportunities to engage in training and learning;
- to make sure that every employee understands and engages in the council's equality duties ;
- to carry out equality monitoring and encourage more self-declaration on all equality strands.

LB Merton Equality and Community Cohesion Policy 2017-2021

1.22 Croydon's Equality Policy 2016-20 and the supporting Opportunity and Fairness Plan sets out the following aims and objectives.

Aims

The aims of the Equality and Community Cohesion Strategy 2017-21 are to:

- bridge the gap between the levels of deprivation and prosperity in the borough;
- improve understanding of the borough's diversity and foster better understanding between communities;
- improve understanding of 'hidden' disabilities and the challenges that disabled residents face in all aspects of their lives. We aim to work in a cross-cutting way and take a holistic approach to more effectively address the needs of disabled residents;
- support those who do not usually get involved in decision-making to better understand how they can get involved and get their voices heard;
- support residents to access on-line access services;
- provide services that meet the needs of a changing population
- employ staff that reflect the borough's diversity.

Equality objectives

1. To ensure key plans and strategies narrow the gap between different communities in the borough;
2. To Improve equality of access to services for disadvantaged groups;
3. Ensure regeneration plans increase the opportunity for all Merton's residents to fulfil their educational, health and economic potential, participate in the renewal of the borough and create a health promoting environment;
4. Encourage recruitment from all sections of the community , actively promote staff development and career progression opportunities and embed equalities across the organisation;
5. Promoting a safe, healthy and cohesive borough where communities get on well together
6. Fulfil our statutory duties and ensure protected groups are effectively engaged when we change our services.

LB Sutton's Equality & Diversity Framework 2019-20 to 2023-24

1.23 Sutton's Equality and Diversity Framework sets out the Council's commitment and approach to eliminating unlawful discrimination, harassment and victimization, advancing equality of opportunity, and fostering good relations within the borough Sutton from 2019-20 to 2023-24.

1.24 It sets out the following Core Objectives:

Objective 1
Encourage tolerance, mutual understanding and respect between all community members and interest groups, including people with a disability, newly-arrived migrants, asylum seekers and refugees, gypsies and travellers, people of different ethnicities and race, people of different faiths, gender identity and sexual orientation.

Objective 2
Target and challenge social isolation, particularly that experienced by people with a disability, Black Asian and Minority Ethnic (BAME) individuals, and older people at risk of isolation or with long-term conditions.

Objective 3
Strengthen the Council's approach to engaging with residents and community groups so that they feel they have a say in the services the Council delivers, particularly people with a disability and faith and BAME groups. This includes maximising the use of existing Council mechanisms, such as borough consultations, Local Committees and external ones such as the Fairness Commission.

Objective 4
Empower equality and diversity organisations, the voluntary sector, local businesses and residents by monitoring and publishing equality and diversity information and outcomes so that they can understand the reasons for Council decisions and challenge any decisions that they believe are unjustified.

2. Equalities Target Groups in South London

Equalities target groups

2.1 Table 2.1 identifies the range of equality target groups considered as part of this EqIA report.

Table 2.1: Equalities Target Groups

Equality Target Group	Equality Target Strand
Women	Gender
Black and minority ethnic (BME) people	Race
Older people	Age
Young people and children	Age
Disabled people	Disability
Lesbians, gays, bisexuals and transgendered	Sexuality
Different faith groups	Faith
People affected by social deprivation	Social Deprivation

Women, older people, young people and children

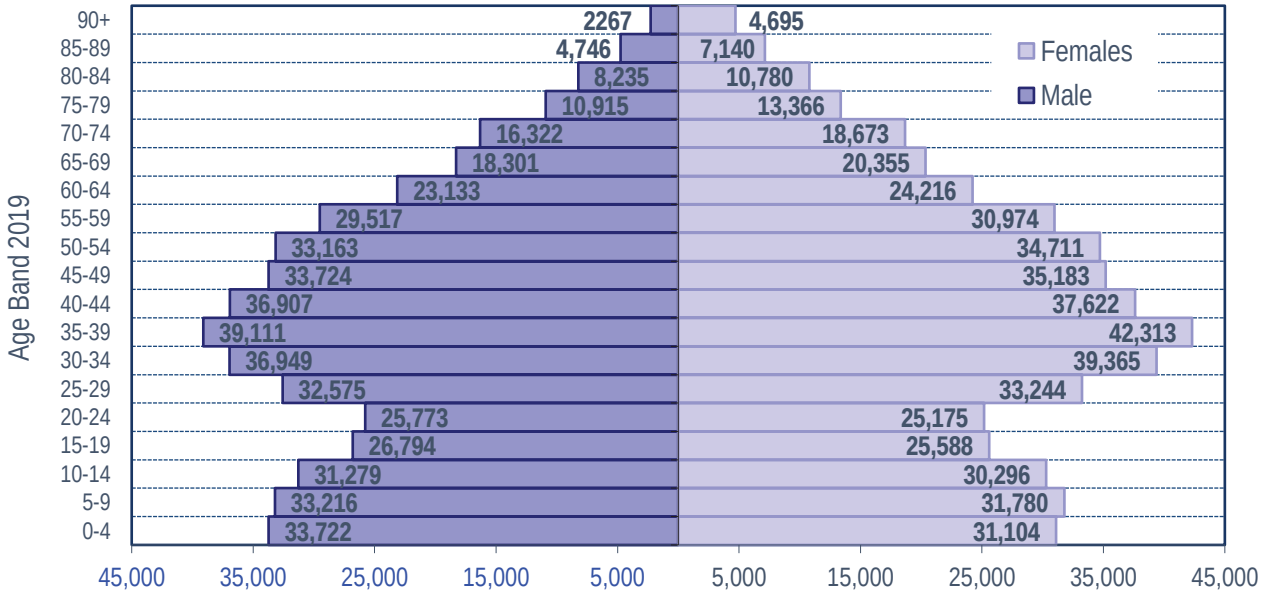
Table 2.2: Population structure for SLWP boroughs and plan area 2019

	Resident Population 2019			
	Age band	Males	Females	All persons
Croydon	Borough residents aged 0-15	42,104 (22.6%)	40,478 (20.5%)	**82,582 (21.5%)**
	Borough residents aged 16-64	120,450 (64.6%)	127,654 (64.7%)	**248,104 (64.6%)**
	Borough residents aged 65+	23,865 (12.8%)	29,287 (14.8%)	**53,152 (13.9%)**
	Total	**186,419**	**197,419**	**383,838**
	Age band	Males	Females	All persons
Kingston	Borough residents aged 0-15	16,801 (19.4%)	16,488 (18.6%)	**33,289 (19%)**
	Borough residents aged 16-64	58,605 (67.8%)	58,416 (66%)	**117,021 (66.9%)**
	Borough residents aged 65+	11,099 (12.8%)	13,571 (15.4%)	**24,670 (14.1%)**
	Total	**86,505**	**88,475**	**174,980**
	Age band	Males	Females	All persons
Merton	Borough residents aged 0-15	23,074 (23.8%)	21,844 (20.5%)	**44,918 (22.1%)**
	Borough residents aged 16-64	62,029 (64.1%)	70,046 (65.8%)	**132,075 (65%)**
	Borough residents aged 65+	11,739 (12.1%)	14,595 (13.7%)	**26,334 (12.9%)**
	Total	**96,842**	**106,485**	**203,327**
	Age band	Males	Females	All persons
Sutton	Borough residents aged 0-15	21,983 (22%)	20,688 (19.7%)	**42,671 (20.8%)**
	Borough residents aged 16-64	63,817 (63.9%)	66,668 (63.6%)	**130,485 (63.7%)**
	Borough residents aged 65+	14,084 (14.1%)	17,535 (16.7%)	**31,619 (15.5%)**
	Total	**99,884**	**104,891**	**204,775**

	Age band	Males	Females	All persons
SLWP area	Residents aged 0-15	103,962 (22.2%)	99,498 (20%)	**203,460 (21%)**
	Residents aged 16-64	304,901 (64.9%)	322,784 (65%)	**627,685 (65%)**
	Residents aged 65+	60,787 (12.9%)	74,988 (15%)	**135,775 (14%)**
	Total	469,650	497,270	**966,920**

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 2.1: Population structure by gender and age band for the plan area 2019



Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Disabled people

Table 2.3: Incapacity benefit claimants for SLWP boroughs and plan area 2019

	Numbers	Percentage aged 16-64
Croydon	280	0.11%
Kingston	80	0.07%
Merton	110	0.08%
Sutton	120	0.09%
SLWP	590	0.09%
London	6,980	0.12%

Source: Incapacity Benefit or Severe Disablement allowance claimants (DWP, 2019)

Black and minority ethnic (BME) people

Table 2.4: Ethnic breakdown for SLWP boroughs and plan area 2019

	White	Black and Minority Ethnic (BAME)	*Asian or Mixed Race*	*Black or Mixed Race*	*Other*	*Chinese*
Croydon	**188,737** (47.6%)	**207,812** (52.4%)	*76,805 (19.4%*	*109,216 (27.5%)*	*16,762 (4.2%)*	*5,029 (1.3%)*
Kingston	**121,925** (67.5%)	**58,673** (32.5%)	*36,758 (20.4%)*	*8,292 (4.6%)*	*9,520 (5.3%)*	*4,104 (2.3%)*
Merton	**133,098** (63.2%)	**77,354** (36.8%)	*42,749 (20.3%)*	*24,124 (11.5%)*	*7,561 (3.6%)*	*2,920 (1.4%)*
Sutton	**153,461** (73.2%)	**56,206** (26.8%)	*31,975 (15.3%)*	*15,833 (7.6%*	*5,686 (2.7%)*	*2,711 (1.3%)*
SLWP	**597,221** (59.9%)	**400,045** (40.1%)	*188,287 (18.9%)*	*157,465 (15.8%)*	*39,529 (4.0%)*	*14,764 (1.5%)*
London	**5,161,532** (56.7%)	**3,944,624** (43.3%)	*1,819,907 (20.0%)*	*1,442,062 (15.8%)*	*526,430 (5.8%)*	*156,224 (1.7%)*

Source: GLA Housing-led Ethnic Projections (November 2017)

Faith groups

Table 2.5: Religion for SLWP boroughs and plan area 2019

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion
Croydon	49.3%	-	5.5%	-	8.8%	-	2.8%	33.6%
Kingston	41.9%	1.3%	6.1%	-	11.0%	-	2.2%	37.6%
Merton	51.7%	-	5.3%	-	6.1%	-	3.5%	33.3%
Sutton	48.8%	-	8.2%	-	7.3%	-	2.1%	33.6%
SLWP	**48.4%**	**0.2%**	**6.2%**	**0.0%**	**8.3%**	**0.0%**	**2.7%**	**34.3%**
London	44.5%	0.9%	5.2%	2.2%	14.2%	1.4%	2.3%	29.4%

Source: GLA Data store – Annual Population Survey (June 2019

Social deprivation

Table 2.6: Index of Multiple Deprivation (IMD 2019) - national ranking and change since 2015

	Social deprivation ranking compared to the 317 areas in England[75]		
	IMD 2015[76]	IMD 2019	Change 2015-19
Croydon	95th	**108th** most deprived in England	↓
Kingston	270th	**273rd** most deprived in England	↓
Merton	209th	**213th** most deprived in England	↓
Sutton	211th	**226th** most deprived in England	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 2.7: Index of Multiple Deprivation (IMD 2019) - London ranking and change since 2015

	Social deprivation ranking compared to the 33 London Boroughs		
	IMD 2015	IMD 2019	Change 2015-19
Croydon	17th	**15th** most deprived in London	↑
Kingston	32nd	**32nd** most deprived in London	No change
Merton	28th	**29th** most deprived in London	↓
Sutton	29th	**31st** most deprived in London	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

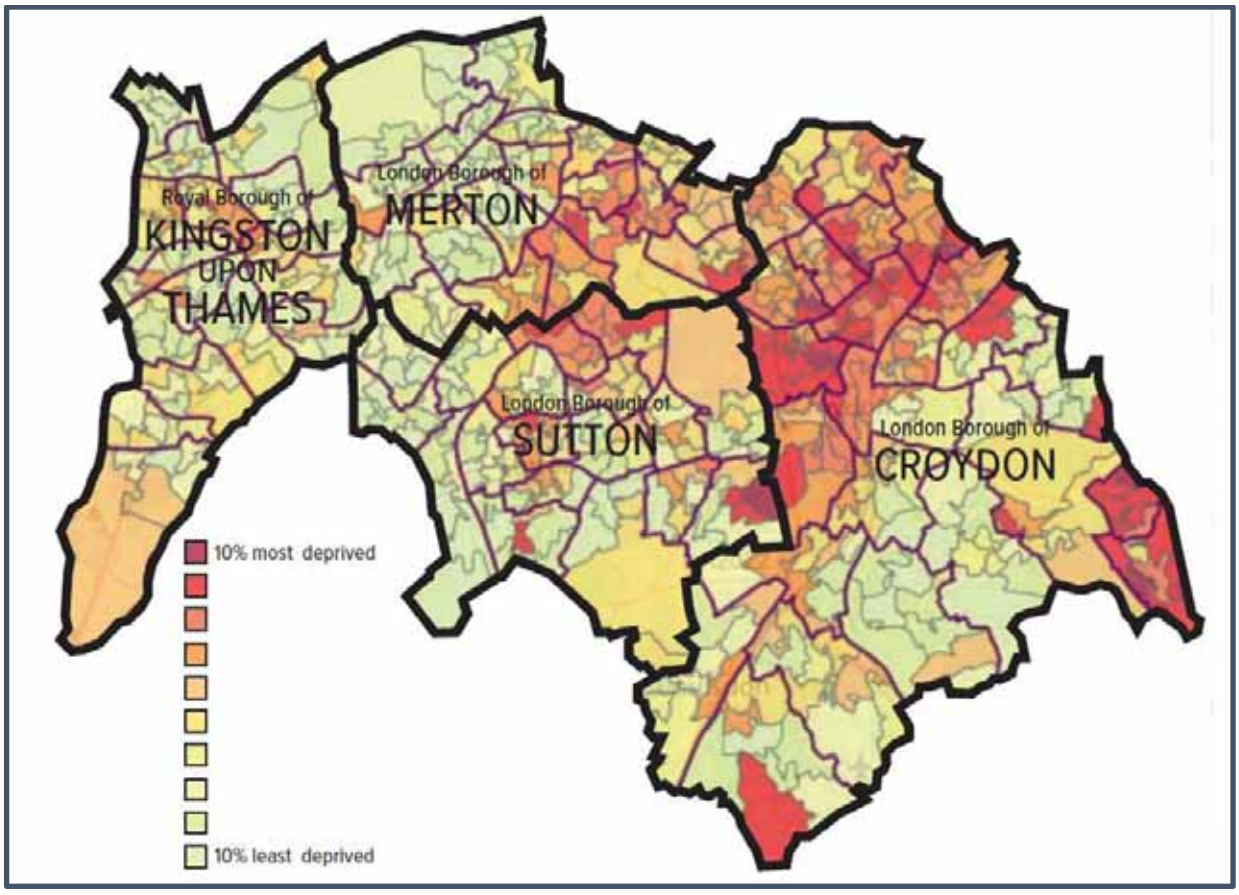
Table 2.8: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England

	IMD 2019 – Ranking of average score			
	LSOAs ranked in 10% most deprived	LSOAs ranked in 20% most deprived	LSOAs ranked in 10% least deprived	LSOAs ranked in 20% least deprived
Croydon	5	44	7	19
Kingston	0	1	13	38
Merton	0	3	22	41
Sutton	1	7	23	42

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

[75] based on IMD 2019 'rank of average score' (1st = most deprived and 317th = least deprived)
[76] 2015 data recast to 2019 lower tier (district) authorities following boundary changes

Figure 2.2: Index of Multiple Deprivation (IMD 2015) map for SLWP area[77]



[77] showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)

3. Equalities Impact Assessment

EqIA criteria

3.1 Table 3.1 sets out the EqIA criteria as the basis for assessing the potential impacts of emerging South London Waste Plan (SLWP) policies upon each equality target group.

Table 3.1 EqIA criteria

EqIA Criteria
Will the policy or proposal have beneficial or adverse impacts for women?
Will the policy or proposal have beneficial or adverse impacts for black and minority ethnic (BAME) groups or faith groups?
Will the policy or proposal have beneficial or adverse impacts for older people?
Will the policy or proposal have beneficial or adverse impacts for young people and children?
Will the policy or proposal have beneficial or adverse impacts for disabled people and people with a limiting long-term illness?
Will the policy or proposal have beneficial or adverse impacts for lesbians, gays, bisexuals and/or transgendered people (LGTB groups)?
Will the policy or proposal have beneficial or adverse impacts for people affected by social deprivation?
Will the policy or proposal have beneficial or adverse impacts for gypsies and/or travellers?

EqIA Matrix and Scoring system

3.2 The outcome off EqIA Screening in relation to each of the proposed waste policies WP1-WP10 set out in the draft SLWP Submission Version are presented in the Screening Matrix below. As before, the extent of the likely beneficial or adverse impacts on each target equality group is recorded in the matrix using the symbols shown in Table 4.2.

Table 4.2: Scoring system for use in EqIA screening

Symbol	Scale of effect
+ +	Larger beneficial impact
+	Smaller beneficial impact
-	Neutral or no impact
X	Smaller negative impact
XX	Large negative effect.
?	Uncertain impact and/or the nature and magnitude of the impact is subject to the implementation of other planning policies.

EqIA MATRIX: IMPACTS OF PROPOSED SOUTH LONDON WASTE PLAN POLICIES ON EQUALITY GROUPS

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP1: STRATEGIC APPROACH TO HOUSING AND COMMERCIAL AND INDUSTRIAL WASTE (unchanged)								
OPTION 1: PROPOSED POLICY WP1 - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT) (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036. (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3). (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).	+	+	++	++	++	+	+	++
OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT) Carry forward Policy WP1 from existing SLWP 2012	?	?	+ ?	+ ?	+ ?	?	+ ?	+ ?
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)	X	X	XX	XX	XX	X	XX	XX
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP1 to expire in 2021	X	X	XX	XX	XX	X	XX	XX

Proposed Policy WP1 will have beneficial impacts on **older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation** by:

- minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or 'broad locations' in South London over the plan period;
- minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality;
- safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses;
- ensuring that waste facilities are fully adapted to climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS

Older people, young people, disabled people and people with a limiting long term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts.

There will be less significant benefits for **Women; BME/Faith groups; LGTB people and Gypsies & Travellers** and these will be broadly in line with those experienced by the wider community.

POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE (amended)								
OPTION 1: PROPOSED POLICY WP2 - SAFEGUARD EXISTING SITES ONLY (a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 420,275 tpa [to] 2036. The boroughs of the SLWP will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (Policy WP3). (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5. (d) New sites (either transfer or management) will not be supported forRadioactive Waste, Agricultural Waste and Hazardous Waste. (e) ... improvements to the operation of and the enhancement ofthe environment of the Hogsmill and the Beddington STW will be supported,	+	++	++	++	++	+	++	++
OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.	+ ?	+ ?	+ ?	+	+	+?	+	+
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.	+ ?	+ ?	+ ?	+	+	+?	+	+
OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP2 expires in 2021	X	XX	XX	XX	XX	X	XX	XX

Proposed Policy WP2 will have significant beneficial impacts (++) for **older people; young people and children; disabled people; and people with a limiting long-term illness** by:

- ensuring that any new sites for C&D waste are for compensatory provision only, thus helping to minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues that would otherwise arise from additional HGV movements;
- not supporting the development of new sites (either transfer or management) for radioactive waste, agricultural waste and hazardous waste;
- ensuring that additional C&D waste capacity can only be delivered through the intensification of existing sites and ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed. Enhancing the environment of the Hogsmill Sewage Treatment Works and the Beddington STWs

Older people, young people and children, disabled people and people with a limiting long term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements to and from waste sites. The most significant effects include air pollution and associated health impacts (e.g. asthma and respiratory disease) resulting from elevated levels of nitrogen dioxide (NO2) and particulates (PM10 and PM2.5) particularly in the vicinity of major roads, residential areas, schools and Air Quality Focus Areas. These groups are also disproportionately affected by a number of impacts potentially arising from the construction and operation of waste sites, particularly within smaller, more constrained employment locations where there are residential areas and other vulnerable land-uses nearby. For these reasons, avoiding new C&D sites is appraised to have significant beneficial effects

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP3: EXISTING WASTE SITES (unchanged)								
OPTION 1: PROPOSED POLICY WP3 Safeguarding (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only. Intensification (b) The intensification of use of a safeguarded waste site, measured by theincrease of tonnes of waste managed per annum, will be supported, subject tothe other policies in this South London Waste Plan and the relevant borough'sDevelopment Plan. Safeguarding Compensatory Provision (c) Compensatory provision for the loss of an existing safeguarded waste site willbe required with the level of compensatory provision necessary to beconsidered on a case-by-case basis. The list of safeguarded sites will beupdated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only. (d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted. Safeguarding Waste Hierarchy (e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to same level in hierarchy as prior to development.	+?	+?	+ +?	+ +?	+ +?	+?	+?	++?
OPTION 2: EXISTING PLAN Carry forward Policies WP3 & WP4 from SLWP 2012.	?	?	+ ?	+ ?	+?	?	?	+ ?
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policies WP3 and WP4 to expire	?	?	x	x	x	?	?	x

Proposed Policy WP3 on **Existing Waste Sites** would have beneficial impacts for **older people; young people and children; disabled people; and people with a limiting long-term illness** by:

- safeguarding existing waste sites within South London for waste uses only, thus avoiding the need for new sites to be developed unless this is for compensatory provision. As discussed above under Policies WP1 and WP2, this will help to minimise local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues that would otherwise arise from additional HGV movements and the construction and operation of new sites in less suitable locations;
- protecting the quality of the environment, particularly for vulnerable receptors, by avoiding the adverse impacts of noise, vibration, dust, soil contamination, odour and water pollution during both the construction and operational phases that would otherwise arise from the development of new waste management sites. It should be noted that any adverse effects arising from an existing operational waste site should have already been mitigated to acceptable levels through a construction management plan, planning conditions and via the waste permitting regime.
- ensuring that any development on an existing safeguarded site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.;
- minimising the potentially adverse effects on human health and quality of life, particularly within areas affected by social deprivation, by minimising the adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues, that would otherwise arise from the development of new waste management sites within south London, either to exceed the apportionment for South London and/or to compensate for any loss of capacity outside the plan area. The current or future effects of each existing safeguarded waste site on equalities target groups will naturally vary depending on the particular circumstances of each site and are therefore subject to a degree of uncertainty (?). Key issues include access to and from the strategic road network, the future potential for intensification or upgrading the site, the presence of vulnerable neighbouring land uses, site constraints and the extent to which the site is compliant with planning conditions or environmental permitting..

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP4: SITES FOR COMPENSATORY PROVISION (unchanged)								
OPTION 1:PROPOSED POLICY WP4 Proposals for new waste sites to provide compensatory provision should: (a) Demonstrate that the site is capable of providing suff. compensatory capacity. (b) Be located on sites: (i) within SILs or Locally Significant Industrial Location; (ii) not having an adverse effect on nature conservation areas protected by international or national regulations; (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted in FZss 3a or 3b. (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area (d) Have particular regard to sites which: (i) do not result in visually detrimental development conspicuous from strategic open land (e.g. Green Belt or MOL); (ii) are located more than 100 metres from open space; (iii) are located outside Groundwater Source Protection Zones (i.e. farthest from protected groundwater sources) (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk (v) have direct access to the SRN; (vi) have no Public Rights of Way crossing the site; (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character archaeological sites and strategic views; or (viii) offer opportunities to accommodate various related facilities on a single site.	+	+	+ +	+ +	+ +	+	+	+ +?
OPTION 2: EXISTING PLAN Carry forward Policy WP5 in existing SLWP	+?	+ ?	+ +?	+ +?	+ +?	+ ?	+ ?	+?
OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP5 expires in 2021	x?	x?	xx	xx	xx	x?	x?	xx?

Proposed Policy WP4 on **Sites for compensatory provision** would have beneficial impacts for **women, older people; young people; disabled; and people with a limiting long-term illness** by:

- updating criteria to mitigate the potentially adverse impacts of waste sites which have been proposed for compensatory provision, thereby minimising disproportionate impacts upon certain equalities target groups. These include not permitting hazardous waste facilities within Flood Zones 3a or 3b; avoiding adverse effects on on-site or off-site flood risk and favouring sites which are located more than 100 metres from open space; located outside Groundwater Source Protection Zones; have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water: provide easy access for staff to cycle or walk; have direct access to the strategic road network; and have no Public Rights of Way crossing the site; and
- giving consideration to the potentially negative cumulative effects of a concentration of waste uses in one area and balancing these against the advantages of co-location

Proposed Policy WP4 will have less significant beneficial effects on **Women; BME/Faith groups; LGTBand Gypsies and Travellers** broadly in line with those experienced by the wider community.

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP5: PROTECTING AND ENHANCING AMENITY (unchanged)								
OPTION 1: PROPOSED POLICY WP5 (a) Developments for compensatory/intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment. (b) The parts of a [site] where unloading, loading, storage and processing takes place should be in a fully enclosed covered building. (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected; (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas (iv) Groundwater, surface water and watercourses (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated (vi) Noise and vibration from the plant and traffic generated (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials (viii) The safety and security of the site (ix) Odour, litter, vermin and birds; and, (x) The design of the facility, particularly • complementing or improving the character of an area; • limiting the visual impact of the development by employing hard and soft landscaping and minimising glare; • being of a scale, massing or height appropriate to the townscape or landscape; • using good quality materials; • minimising the requirement for exterior lighting; and, • utilising high-quality boundary treatments	+	+	+ +	+ +	+ +	+	+	+ +?
OPTION 2: EXISTING PLAN Carry forward Policy WP7 in existing SLWP 2012	+?	+ ?	+ ?	+?	+ ?	+ ?	+ ?	+?
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP7 to expires in 2021	x?	x?	xx	xx	xx	x?	x?	x

Proposed Policy WP5 on **Protecting & Enhancing Amenity** would have beneficial impacts for older people; young people; disabled people; people illness; and people affected by social deprivation by:

- ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building.
- requiring that planning applications are accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. All of these measures will help to mitigate potential impacts that would otherwise have disproportionate impacts upon the above equalities target groups.
- since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way will also be beneficial

Proposed Policy WP4 will have less significant benefits for **Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers** in line with those experienced by the wider community

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES (amended)								
OPTION 1: PROPOSED POLICY WP6 (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptablewhere the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies ofthe relevant borough"s Development Plan. (b) Waste facilities will be required to: (i) minimise on-site carbon dioxide emissions in line with 2020 London Plan Policy SI2; (ii) be fully adapted and resilient to thefuture impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/ heatwaves, air pollution, drought conditions and impacts on biodiversity; (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with 2020 London Plan Policy G5; (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials; (v) minimise waste and promote sustainable management of construction waste on site; and, (vi) protect, manage and enhance local habitats and biodiversity	++	+	+ +	+ +	+ +	+	+	+ +?
OPTION 2: EXISTING PLAN Carry forward Policy WP6 from existing SLWP 2012	+	+?	+	+	+	+ ?	+ ?	+
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP6 to expire in 2021	XX	X?	XX	XX	XX	X?	X?	XX

Proposed Policy WP6 on **Sustainable design and construction** would have beneficial impacts for older people; women, young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by:

- requiring all waste developments to achieve BREEAM 'Excellent', to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures in order to manage risk both to and from the development over its planned lifetime;
- incorporating best practice sustainable design and construction measures in line with BREEAM 'Excellent' aimed at promoting inclusive environments and reducing crime, fear of crime and anti-social behaviour, thus having particular benefits in terms of women, young people and children and older people
- further reducing disproportionate impacts on certain equalities target groups by helping to minimise air pollution, making more efficient use of resources and reducing the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement
- ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5;
- requiring all new or upgraded waste facilities to be fully adapted and resilient to the future impacts of climate change including flooding, summer heatwaves, contribution to the urban heat island (UHI) effect and drought It is well established that climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as the young, the elderly and people suffering from respiratory diseases
- avoiding negative environmental impacts (e.g noise, air pollution, health impacts, community severance, amenity and quality of life) associated with waste management practices towards the bottom of the waste hierarchy (e.g. landfill and incineration) and associated transport movements which might disproportionately affect areas of social deprivation, thus having particular benefits for BME people, certain faith groups, disabled people, older people and young people and children.

Proposed Policy WP6 will have less significant beneficial effects on **BME/Faith groups; Lesbians, gays, bisexuals and transgender (LGTB) and Gypsies and Travellers** and these are expected to be broadly in line with those experienced by the wider community.

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP7: THE BENEFITS OF WASTE (unchanged)								
OPTION 1: PROPOSED PLAN - POLICY WP7 (a) Waste development for the intensification of sites,which involve the reuse, refurbishment,remanufacture of products or the production of by-products, will be encouraged. (b) Waste development for additional Energy from Waste facilities will not be supported (c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, andapprenticeship opportunities.	+ +	+	+ +	+ +	+ +	+	+	+ +?
OPTION 2: EXISTING PLAN Carry forward Policy WP8 from existing SLWP 2012.	+	+?	+	+	+	+ ?	+ ?	+
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP8 to expire in 2021.	X	?	X	X	X	?	?	X
Proposed Policy WP7 would have beneficial impacts for **older people; women, young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation** by: • requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas; • minimising air pollution and associated impacts on human health, particularly amongst the young, the elderly, people with respiratory problems and within areas affected by social deprivation, by (i) ensuring that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); and (ii) not supporting the development of additional Energy from Waste (EfW) facilities • ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place) • supporting waste minimization and thus avoiding the potential negative environmental impacts (e.g noise, air pollution, health impacts, community severance, amenity and quality of life) associated with waste management facilities and HGV movements which might disproportionately affect equalities target groups Draft Policy WP6 will have less significant beneficial effects on **BME/Faith groups; LGT) and Gypsies & Travellers** broadly in line with those experienced by the wider community								
POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES (new policy)								
OPTION 1: PROPOSED POLICY WP8 (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them. (b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, the applicant should: (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing,extant, a permission for additional capacity or developed for compensatory provision. (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations.	+?	+ ?	+	+	+	+?	+?	+
OPTION 2: EXISTING PLAN Not applicable.	n/a							
OPTION 3: 'DO-NOTHING' SCENARIO Do not include NEW POLICY W8 in draft SLWP for submission.	?	?	X	X	X	?	?	X
Newly proposed **Policy WP8 on 'New development affecting waste sites'** is considered have some potentially beneficial impacts for older people; young people; disabled people; people with a long-term illness; and people affected by social deprivation by: • ensuring that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and on vulnerable groups. Since the potential adverse impacts of waste operations and associated HGV movements, including air pollution, dust, noise, water pollution, surface water run-odd, light pollution and impacts on the local road network are likely to have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within socially deprived areas areas, this new policy is expected to have a positive impact on the corresponding equalities appraisal criteria. • ensuriung that appropriate mitigation measures are implemented as part of the design and layout of newly proposed 'sensitive' developments in the vicinity of operational waste sites from the earliest stages of project planning and design and as part of the ongoing and future management of the site (secured through planning conditions and obligations) However, proposed Policy WP8 is considered to have less significant benefits specifically for **Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers** (i.e. in line with those experienced by the wider community)								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long-term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP9: PLANNING OBLIGATIONS (unchanged – formerly Preferred Policy WP8)								
OPTION 1: PREFERRED POLICY Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.	+	+	+	+	+	+	+	+
OPTION 2: EXISTING PLAN Carry forward Policy WP8 from SLWP 2012.	+	+	+	+	+	+	+	+
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP8 of existing SLWP 2012 to expire in 2021.	?	?	?	?	?	?	?	?
Proposed Policy WP9 on **Planning Obligations** would have beneficial impacts for promoting **equalities, accessibility and social inclusion** within south London by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities. By minimising the adverse impacts of vehicles routing on the local road network, traffic management measures delivered through planning obligations will have potential benefits for most equalities target groups, in particular young people and children, disabled people and the elderly by steering HGV movements away from local and residential roads.								
POLICY WP10: MONITORING AND CONTINGENCIES (new policy)								
OPTION 1: PROPOSED POLICY WP10 The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton"s Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.	+	+	++	++	++	+	+	++
OPTION 2: EXISTING PLAN Not applicable.					n/a			
OPTION 3: 'DO-NOTHING' SCENARIO Do not include NEW POLICY W10 in draft SLWP for submission.	X	X	XX	XX	XX	X	X	XX
Newly proposed Policy WP10 is considered to have potentially beneficial impacts for most equalities target groups within South London by ensuring that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on a annual basis and by ensuring that consultation will take place between the partner boroughs to determine whether any of the contingency actions listed in Appendix 1 of the draft SLWP need to be taken. The onging monitoring and review of the following indicators and the partner Boroughs' stated commitment to take contingency action where necessary will therefore help ensure that the various beneficial impacts identified above in this EqIA matrix for waste Policies WP1 to WP9 can be delivered: • Indicator 1: Household and Commercial waste managed; • Indicator 2: Construction and Demolition Waste Managed (for Policy WP2); • Indicator 3: Radioactive, Agricultural and Hazardous Waste Treated (for Policy WP2); • Indicator 4: Existing Waste Sites Safeguarded (for Policy WP3 & WP4); • Indicator 5: Compensatory or Intensified Sites with Fully Enclosed Covered Building (possible introduction of design guidance) (for Policy WP5b); • Indicator 6 Development on Green Belt, Metropolitan Open Land and Open Space (for Policy WP5c); • Indicator 7: Development on Nationally, Regionally or Locally Designated Nature Conservation Areas (for Policy WP5(c) • Indicator 8: Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas (for Policy WP5c); • Indicator 9: Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions(for Policy WP5c); and • Indicator 10: Development Achieving BREEAM and/or CEEQUAL 'Excellent' Rating(for Policy WP6); and • Indicator 11: Development involving Energy from Waste (for Policy WP7).								

4. Conclusions

EqIA Findings

4.1 The outcome of EqIA set out in this report show that the proposed policies included in the draft SLWP Proposed Submission document are expected to have a number of beneficial impacts on all target equality groups identified for the purposes of this assessment and are not generally expected to lead to adverse discriminatory impacts upon any particular equalities target group.

4.2 In the absence of appropriate planning policies and environmental controls aimed at (a) avoiding the need for additional waste facilities to be constructed in unsuitable locations, for example by maximising the efficient operation and throughput of existing waste sites and driving waste management practices further up the waste hierarchy; and (b) mitigating the potentially adverse environmental impacts arising from the construction and operation of compensatory or upgraded waste facilities and associated HGV movements for example by enclosing potentially polluting operations such as skip transfer, it is well established that older people, young people and children, disabled people (including people with a limiting long term illness) and people affected by social deprivation are likely to be disproportionately affected. For waste sites in close proximity to residential areas and other vulnerable land-uses, the most significant adverse effects include increased levels of air pollution in the form of nitrogen dioxide (NO_2) and particulates (PM10/PM2.5),associated health impacts (e.g. respiratory disease), dust, noise/disturbance, community severance and road safety issues. Certain equalities target groups are more strongly represented within those parts of the plan area affected by higher levels of social deprivation, which in turn tend to be in closer proximity to existing waste management facilities and industrial locations

4.3 In addition, where appropriate policy measures are not taken to address both the causes of climate change by reducing CO_2 emissions from waste operations and associated HGV movements) and to ensure that all proposed waste facilities are fully adapted to the impacts of climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS, these groups are also likely to be disproportionately affected.

4.4 Overall, the EqIA matrix shows that the proposed approach to the management of future waste arisings in South London set out in the draft SLWP (**Option 1**), is considered to have positive impacts on most equalities target groups by comparison with both **Option 2: Existing Plan (Exceed Apportionment)** and Option 3¨**Do-Nothing' scenario.** More specifically, the appraisal indicates that proposed Policies WP1-WP10 are likely to have particular benefits for **older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation** by:

- minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or 'broad locations' in South London over the plan period;
- minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality;
- safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses
- ensuring that waste facilities are fully adapted to climate change including summer heatwaves,

urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS.

- providing a greater degree of certainty about the nature and extent of planned waste related developments would serve to reassure local communities and equalities target groups in particular over what to expect. There are therefore be particular benefits for BME people, certain faith groups, older people and young people, who are more likely to live within socially deprived areas already affected by a poor quality environment and in close proximity to potential waste sites;
- promoting the circular economy and the co-location of complementary waste facilities to support manufacturing-from-waste with waste management facilities has potentially significant benefits for certain equalities target groups, in particular certain faith groups, older people and young people, who are more likely to be affected by social and economic deprivation, who would thus benefit from enhanced and more widespread local employment and educational opportunities; and
- co-location, along with other measures likely to promote 'linked trips', would have particular benefits for disabled people, along with children and older people, who are more vulnerable to the adverse health and social impacts of road transport compared to the wider community.
- introducing a new commitment through proposed Policy WP8 'New Development Affecting Waste Sites' to ensue that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and quality of life. In certain circumstances, this will help to avoid or mitigate the adverse impacts of waste operations and associated HGV movements on vulnerable groups such as the elderly, the young, people suffering from health problems and people living within socially deprived areas arising from air pollution, dust, noise, water pollution, surface water run-odd, light pollution and impacts on the local road network; and
- introducing a new commitment through Policy WP10 'Monitoring and Contingencies' to ensure that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on a annual basis and that consultation will take place between the partner boroughs to determine whether any of the contingency actions listed in Appendix 1 of the draft SLWP need to be taken. Onging monitoring and review is therefore provides a further guarantee that the various beneficial impacts for equakities groups identified in the EqIA matrix can be delivered.

4.5 Overall, there will be less significant benefits specifically in relation to **Women; BME/Faith groups; LGTB people and Gypsies & Travellers** since any beneficial impacts on these groups are likely to be broadly in line with those experienced by the wider community.

Next Steps

4.6 This EqIA Report, which accompanies the SA Report (as Appendix 1) is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from 4 September to 22 October 2020. Copies are available at the following locations:

- https://www.croydon.gov.uk/planningandregeneration/framework/localplan/slwaste-plan;
- www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan;
- www.merton.gov.uk/local-plan; and
- www.sutton.gov.uk/currentconsultations.

4.7 Following the Regulation 19 consultation stage, a finalised version of the EqIA Report will be prepared alongside the proposed SLWP 2021-36 and accompanying SA Report for formal submission to the government. In due course, the EqIA Report will be considered by the Planning Inspector at the Examination-in-Public.

Appendix 2

HABITATS REGULATIONS ASSESSMENT (HRA)

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

1. Background to Habitats Regulations Assessment (HRA) Screening

1.1 The requirement for public authorities to undertake Habitats Regulations Assessment (HRA) plans or projects (sometimes termed 'Appropriate Assessment') of is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive').

1.2 The aim of the Habitats Directive is to conserve natural habitats and wild species across Europe by establishing a network of sites known as Natura 2000 sites. Under Article 6(3) of the Habitats Directive, an HRA is required where a plan or project is likely to have a significant effect upon a European site, either individually or in combination with other projects.

1.3 Further to this, Article 6(4) states that where an HRA has been carried out and results in a negative assessment (in other words, the development will adversely affect the site(s) despite any proposed avoidance or mitigation measures or if uncertainty remains), consent will only be granted if there are no alternative solutions, there are Imperative Reasons of Overriding Public Interest (IROPI) for the development, and compensatory measures have been secured.

1.4 The protection given by the Habitats Directive have been incorporated into UK legislation through the Habitats Regulations 2010 (as amended). The Regulations are responsible for safeguarding designated European sites within the UK and therefore for protecting the habitats and species listed in the Annexes of the Directive. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on any of the above sites.

1.5 The purpose of undertaking HRA in the preparation of land use plans is to ensure that the protection and integrity of European sites is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that HRA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section[24] (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A -85E) which requires local planning authorities to undertake HRA of land use plans in England and Wales in line with the Directive.

1.6 These HRA requirements were carried forward in the Conservation of Habitats and Species Regulations 2017 and therefore have legal force despite the UK's formal departure from the European Union on 31 January 2020.

2. The role of Natural England

2.1 As a public body, Natural England has important statutory duties and responsibilities as defined in the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'), which transpose the European Habitats Directive 1992 and the Wild Birds Directive 2009 into English law. The Habitats Regulations require Natural England to 'secure compliance' with the requirements of the Directives when specifically discharging its nature conservation functions and to have regard to the requirements of the Directives when exercising all of its other functions (Regulation 9). Natural England becomes a 'competent authority' under the Regulations when the exercise of its functions will or may affect European Sites (for example classified SPAs and designated SACs).

[24] entitled 'Appropriate Assessments for Land Use Plans in England and Wales'.

2.2 Natural England is a statutory consultee on strategic plans including Development Plans Documents (DPD) such as the SLWP, as well as on related HRA assessments. The Natural England 'Operational Standard Responding to Consultations on Development' (NE, 2017)[25] states that

> *"We will advise Competent Authorities on HRAs where we consider the plan or project is likely to have a significant effect on a European site, either individually or in combination with other plans or projects. We will advise on any Appropriate Assessments (AA), including the measures proposed to avoid, mitigate or compensate for significant adverse effects. We will work closely with decision makers and developers to find solutions to adverse environmental impacts and to maximise common ground. We may, in the last resort, be obliged to object to plans or projects where:*
> - *an AA does not incorporate sufficient information or necessary mitigation measures*
> - *adverse effects on site integrity cannot be ruled out or*
> - *where there are imperative reasons of overriding public interest to justify the development and the proposed compensatory measures are not sufficient to ensure the overall coherence of the Natura 2000 network".*

2.3 Accordingly, the Government's National Planning Practice Framework (NPPF) (2019) confirms that competent authorities must consult Natural England for the purposes of the HRA assessments and must have regard to any representations that Natural England may wish to make. This includes the provision of formal HRA screening advice to local planning authorities (including joint authorities).

3. European sites potentially affected by the new SLWP

3.1 The following four European sites are located within or in relatively close proximity to the plan area and are therefore potentially affected by the new SLWP 2021-36:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA.

3.2 Map 3.1 shows the location of these sites in relation to the boundaries of the London Borough of Sutton, one of the four partner boroughs. It can be seen that only Wimbledon Common SAC lies within the boundaries of the SLWP area.

3.3 Natural England's formal advice on conservation objectives is publicly available for all European sites. The advice is not repeated here in full, but Table 3.1 below provides links to the respective conservation objectives, supplementary advice on conserving and restoring site features.

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[25] see file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/NESTND037%20Operational%20Standard%20V1.0%20EXTERNAL%20(2).pdf

Map 3.1: Location of Special Areas of Conservation (SACs) and Special Protection Areas in relation to the South London Waste Plan Area

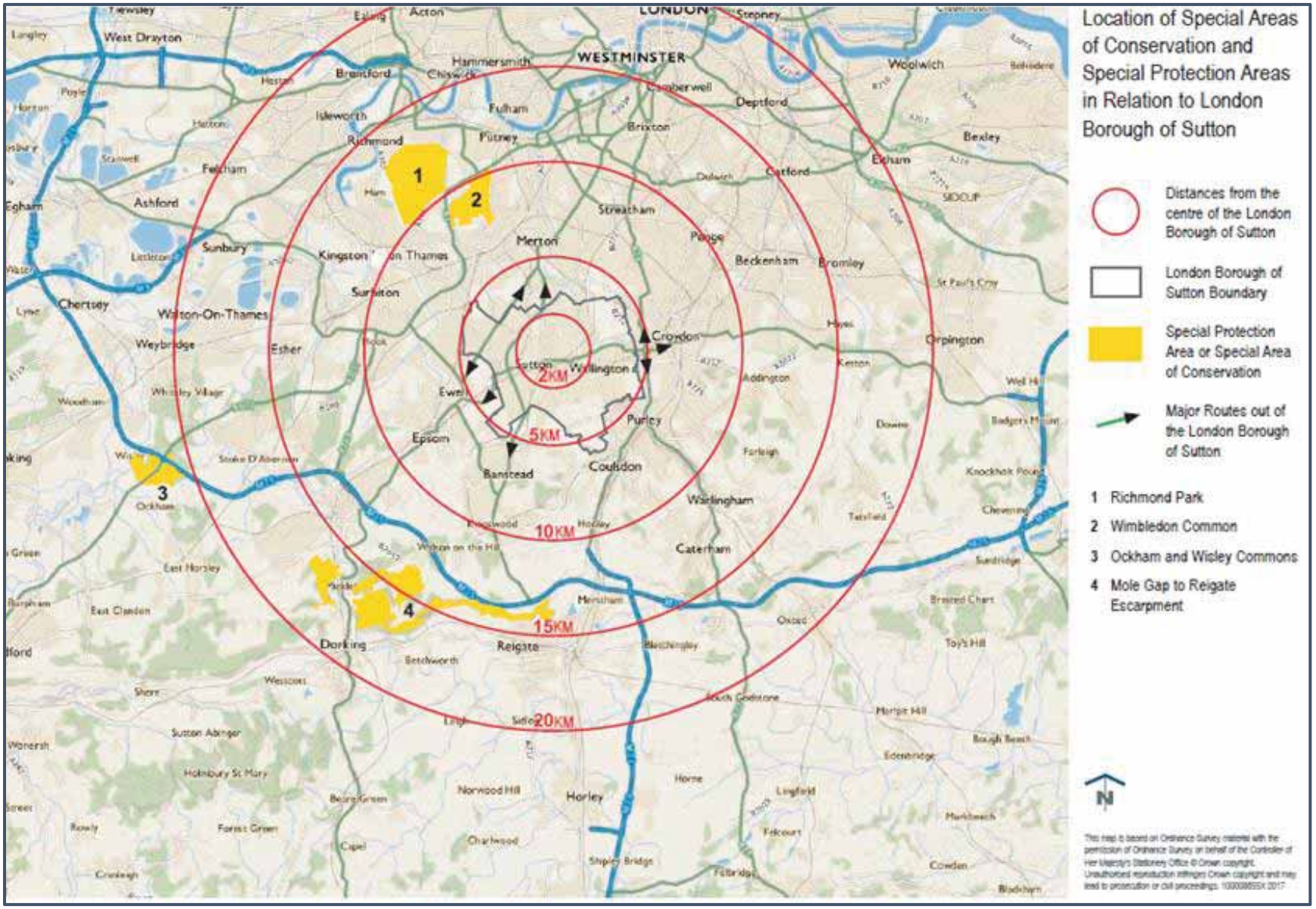

Table 3.1 Links to Conservation Objectives, Supplementary Advice and SAC Citations for European Sites

European Site	Conservation Objectives	Supplementary Advice	SAC Citation
Richmond Park SAC;	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK0030246%20RichmondPark%20SACV2018%20(1).pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK0030082_RichmondParkSAC_COSA_final%20advice%2031%20May%202016.pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/Richmond%20Park%20citation.pdf
Wimbledon Common SAC;	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK0030301%20WimbledonCommon%20SACV2018%20(1).pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK0030301_WimbledonCommonSAC_supplementary%20advice_final%20advice%2031%20May%202016.pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/Wimbledon%20Common%20citation.pdf
Mole Gap to Reigate Escarpment SAC	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK0012804%20MoleGaptoReigateEscarpment%20SACv2018.pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK0012804_MoleGapToReigateEscarpmentSAC_COSA_Formal%20Published%2025%20Jan%2019%20(3).pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/Mole%20Gap%20to%20Reeigate%20Escarpment%20citation.pdf
Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA.	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK9012141-Thames-Basin-Heaths-SPA-V2019.pdf	file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/UK9012141%20-%20Thames%20Basin%20Heaths%20SPA%20-%20COSA%20Final%20-%209%20May%202016%20v2.pdf	https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001052.pdf file://civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/TB_Heaths_spa%202.pdf

Source: Natural Englamd website May 2020

4. Consultation with Natural England on draft HRA screening assessment

4.1 A draft HRA screening assessment of the emerging SLWP was previously undertaken at the SLWP Issues and Preferred Options stage and included as Appendix 2 to the accompanying SA Report. The draft screening assessment concluded that a full HRA was not required and identified the main reasons underlying this view.

4.2 The HRA screening assessment was published for public consultation between 31 October and 22 December 2019. In addition, an earlier formal HRA screening request on the SLWP was submitted to Natural England via email and letter dated 16 September 2019 (attached).

4.3 In response to the HRA screening request, a letter was received from Sharon Jenkins of Natural England on 17 October 2019 which stated that Natural England *"have no comments to make on this plan"* (see attached). While this initial reponse was interpreted by the four boroughs as endorsing the conclusion that no HRA was required, a follow-up email was sent to Natural England on 22 January 2020 to provide more clarity.

4.4 Natural England's subsequent reponse, received by email from Marc Turner (Senior Planning Advisor) on 31 January 2020, provided further support for screening out a full HRA:

> *"I can confirm nothing has changed in the 4 Boroughs covered by your plan, to currently change the conclusion of that advice from Natural England. There is nothing I know about on the horizon either that is likely to change that advice. So to confirm, we do not feel anything other than a brief HRA Screening is required".*

4.5 The initial HRA screening conclusions have therefore been carried forward in this document unaltered for purposes of consutation on the draft SLWP Submission Version (Regulation 19 consutation

5. HRA Screening conclusions

5.1 It is considered that a full HRA is not required for the new SLWP for 2021-36 for the following reasons:

- no new waste management sites are currently proposed to be safeguarded in the draft SLWP Submission Version and the wider industrial areas formerly identified in Schedule 2 of the existing SLWP as being suitable for waste management uses are proposed to be removed from waste uses;
- to total volume of waste arisings to be managed in South London over the plan period from 2021-36 and the size of the combined London Plan apportionment for the four boroughs in the new London Plan is significantly reduced by comparison with the situation which existed when the current SLWP was being prepared (between 2008 and 2011). Since the existing SLWP was screened out of the need for a full HRA, it seems reasonable to assume that the new plan may also be screened out on the basis that there will be fewer safeguarded sites, smaller throughputs and therefore an overall reduction in waste-related HGV movements;
- the two sites to the south of the plan area, Mole Gap to Reigate Escarpment SAC and Ockham and Wisley Commons SSSI are over 10 km away from the plan boundaries and, according to expert air quality advice provided to LB Sutton at the Examination-in-Public on the Sutton local

Plan in 2017, emissions from transport movements are extremely unlikely to have a significant effect on the rate of NO_2 disposition plant species over this sort of distance. It is understood that the Richmond Park SAC is not sensitive to elevated levels of air pollution designated for biodiversity features that are not air quality-sensitive (this area is important for stag beetle populations);

- the draft SLWP Submission Version seeks to promote the highest standards of sustainable design and construction in new or upgraded waste facilities; a shift away from waste transfer to waste management practices higher up the waste hierarchy; cleaner, more efficient waste management technologies in enclosed buildings; and the principles of the circular economy. All of these trends will serve to reduce any adverse effects upon the identified European sites; and
- the proposed strategy for the management of waste arisings in South London is geared towards achieving self-sufficiency and therefore limit imports and export of waste streams to a from the boundaries of the plan area (longer distance HGV movements would be more likely to impact directly upon more distant nature conservation sites).

ANNEX: CONSULTATION WITH NATURAL ENGLAND ON HRA SCREENING

Gmail by Google

Patrick Whitter <patrick.whitter@sutton.

Habitats Regulations Assessment (HRA) Screening for joint South London W Plan

1 message

[redacted] 25 September 2019 >

Dear Sir or Madam,

The London boroughs of Croydon, Kingston, Merton and Sutton are now preparing a joint South London Waste (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current S 2011-21 introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste management facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets s in the draft London Plan up to 2036, including the aim of net self-sufficiency by 2026; and
- setting out appropriate planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy

As part of the initial stages of plan-making, we have already prepared an **SA/SEA Scoping Report (attached)** has recently been sent to the relevant contacts at Natural England, Historic England and the EA for their input (1 September-21 October 2019). Public consultation on the SLWP Issues and Preferred Options document togethe a further SA/SA Report is scheduled to take place from 31 October to 22 December 2019 subject to Committee approval on 8 October.

As the officer responsible within the SLWP team for overseeing the SA/SEA, Equalities Impact Assessment (Eq and HRA processes, I would be very grateful if you could clarify the following key issues:

(1) At what stage of the plan-making process should an HRA Screening Assessment be prepared?
We were thinking that an HRA Screening Assessment could be published for public consultation alongsid SLWP Issues and Preferred Options document from 31 October to 22 December 2019. This would be accompanied by a request to Natural England for screening advice. If the outcome of screening determin that a full HRA was required in relation to the joint SLWP, there would still be ample opportunity to prepar consult on this at the Submission draft stage. However it would be useful to have your advice on whether HRA Screening Assessment needs to be published in advance of consultation on Issues and Preferred Options i.e. in the next 5 weeks.

(2) Does Natural England once again provide formal HRA screening advice to local planning authorities?
When the Sutton Local Plan was being produced between 2014 and 2018, Natural England were not in a position to provide formal HRA screening advice. However colleagues have advised me that this service now been resumed so I would be very grateful if you could clarify how the procedures for consulting on H Screening reports are now meant to operate.

Any advice you could offer on the above HRA issues would be very gratefully received.

Regards

[redacted]

Date: 17 October 2019
Our ref: 295079
Your ref: London Waste Plan

NATURAL ENGLAND

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

[redacted]

[redacted]

[redacted]

Planning Consultation: SA/SEA Scoping Report on new South London Waste (SLWP) Plan 2021-36

Thank you for your consultation on the above Strategic Planning Consultation, dated 16th September, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

[redacted]

Gmail

Patrick Whitter <patrick.whitter@sutton.gov.uk>

Re: Habitats Regulations Assessment (HRA) Screening for the joint South London Waste Plan - Urgent Request for Advice

1 message

[redacted] 22 January 2020 at 15:28

[redacted]

Dear Sir or Madam,

I'm not sure whether my previous email regarding the South London Waste Plan and HRA screening (dated 25 September 2019) was picked up by anyone at Natural England, but I now need some advice on this issue as a matter of urgency.

As I outlined before, thee London boroughs of Croydon, Kingston, Merton and Sutton are now preparing a joint South London Waste Plan (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21 introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste management facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the draft London Plan up to 2036, including the aim of net self-sufficiency by 2026; and
- setting out appropriate planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy

As part of the initial stages of plan-making, we have already prepared an **SA/SEA Scoping Report (attached)** which was sent to the relevant contacts at Natural England, Historic England and the EA for their input (16 September-21 October 2019). Public consultation on the SLWP Issues and Preferred Options document together with a further SA/SA Report took place subsequently from 31 October to 22 December 2019.

As the officer responsible within the SLWP team for overseeing the SA/SEA, Equalities Impact Assessment (EqIA) and HRA processes, I would be very grateful if you could clarify the following key issues:

(1) At what stage of the plan-making process should an HRA Screening Assessment be prepared?
A brief HRA Screening Assessment was included as part of the SA/SEA Report on the SLWP Issues and Preferred Options document published for public consultation from 31 October to 22 December 2019, and this concluded that a full HRA was not required. However, if Natural England were to advise the four partner boroughs that an HRA was required after all, there would still be an opportunity to prepare and consult on a full HRA at the Submission draft stage. It is therefore essential that we can have some indication of whether Natural England believes that full HRA is merited in this case.

(2) Does Natural England once again provide formal HRA screening advice to local planning authorities?
When the Sutton Local Plan was being produced between 2014 and 2018, Natural England were not in a position to provide formal HRA screening advice. However colleagues have advised me that this service has now been resumed so I would be very grateful if you could clarify how the procedures for consulting on HRA Screening reports are now meant to operate.

Any advice you could offer on the above HRA issues would be very gratefully received.

Regards

[redacted]

Gmail by Google

Patrick Whitter <patrick.whitter@sutton.gov.uk>

RE: 295937 Habitats Regulations Assessment (HRA) Screening for the joint South London Waste Plan - Urgent Request for Advice

1 message

[redacted] 31 January 2020 at 14:17

[redacted]

Thank you for your email. Please find the answers to your questions below;

1. Natural England can technically give advice at any and all stages of the plan making process when it comes to HRA. It depends on the situation, the plan, designated sites, legal decisions etc. I see you consulted us on an SA / SEA consultation. We thought we sent you a No Comment, no HRA required, but I infer from your email that you may never have received that. I can confirm nothing has changed in the 4 Boroughs covered by your plan, to currently change the conclusion of that advice from Natural England. There is nothing I know about on the horizon either that is likely to change that advice. So to confirm, we do not feel anything other than a brief HRA Screening is required.

2. Natural England have always tried to provide advice when consulted. Working in the South East of England we have high turnover of staff that can affect our ability to respond on time to all consultations. If you were to consult us, then you should receive a response from us. As above though, to me, it doesn't seem worthwhile consulting us again as nothing has changed and our advice stands.

I hope this helps,

Kind Regards

[redacted]

[redacted]

Appendix 3

CONSULTEE RESPONSES TO SA SCOPING REPORT

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

(1) Environment Agency: 28 October 2019

creating a better place
for people and wildlife

Environment Agency

[redacted]

Date 28 October 2019
Ref: SL/2006/100128/SE-03/SP1

Statutory consultation with Environment Agency on Sustainability Appraisal (SA) Scoping Report (incorporating SEA) for the South London Waste Plan

Thank you for consulting the Environment Agency on the review of the South London Waste Plan and Sustainability Assessment Scoping Report. We welcome the review of the South London Waste Plan and see the key issues and opportunities relate to

- Maximising opportunities to plan strategically for ongoing changes in the Waste management sector, tackling waste crime and delivering government objectives to move towards a circular economy in line with the Resources and waste strategy for England (December 2018) and Independent review into serious and organised crime in the waste sector (November 2018) and the emerging new London Plan. We have provided comments in Section 1 on the key strategies and guidance on Waste Management which should be assessed and used to inform the policies and proposed sites within the new South London Waste plan.

- Continued partnership working to ensure waste management infrastructure is "fit for purpose" and resilient to a changing climate and supports the rising numbers of new households across, Croydon, Kingston, Merton and Sutton and a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process.

- Promoting partnership working with other agencies such as Health and Safety Executive (HSE) Public Health England and Planning Enforcement and Environmental Health teams, Metropolitan Police, London Fire Brigade, Driver & Vehicle Standards Agency (DVSA) Her Majesty's Revenue and Customs (HMRC) and Border Force to prevent illegal or poor compliant waste management sites.

[redacted]

- Using the latest evidence on flood risk and climate change to ensure exiting and new waste management facilities are located and designed to be resilient to extreme weather events. The latest environmental data sets are available to download from the Defra Data Services Platform

- Developing checklists and guidance as part of the new plan to ensure new and existing waste management sites follow the latest good practice to ensure full enclosure of waste activities in high quality buildings to reduce environmental impacts and are designed to the highest standards to reduce air pollution, noise, surface water pollution and high standards of fire prevention measures

- Sharing information and evidence on the environmental performance and permit compliance across the Plan area.

We hope our comments are helpful and look forward to working with you as the plan progresses to the next stage. If you have any questions or require more information please let me know.

Yours sincerely

Waste Team Leader
South London

[redacted]

Section 1 - Feedback on the Scoping Report (September 2019)

We recommend the Scoping Report is updated to include the latest key waste management strategies listed below.

- **HM Government 25 Year Environment Plan (December 2018)**
- **Resources and waste strategy for England (December 2018)**
- **Independent review into serious and organised crime in the waste sector (November 2018)**

These strategies are promoting an integrated approach to resource and waste management, promoting circular economy, reducing pollution and tackling waste crime.

The planning system has an essential role to play in the successful delivery of these strategies and needs to be included within the Scoping Report and requires partnership working.

HM Government 25 Year Environment Plan
Resources and waste strategy for England (December 2018)
Independent review into serious and organised crime in the waste sector (November 2018)

HM Government 25 Year Environment Plan
https://www.gov.uk/government/publications/25-year-environment-plan

'A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation. Please refer to Chapter 4 which set strategic goals for increasing resource efficiency and reducing waste pollution and waste.

Chapter 4: Increasing resource efficiency and reducing pollution and waste

1. Maximising resource efficiency and minimising environmental impacts at end of life.
i. Achieving zero avoidable plastic waste by the end of 2042
ii. Reducing food supply chain emissions and waste
iii. Reducing litter and littering
iv. Improving management of residual waste
v. Cracking down on fly-tippers and waste criminals
vi. Reducing the impact of wastewater

The South London Waste Plan review should consider how it can help deliver these strategic objectives locally.

Resources and waste strategy for England (December 2018)
https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england

- preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy
- minimise the damage caused to our natural environment by reducing and managing waste safely and carefully
- Deal with waste crime

"Our Strategy focuses on known problems with effective solutions that, among other benefits, will reduce our reliance on single-use plastics, cut confusion over household recycling, tackle the problems of packaging and end the economic, environmental and moral scandal that is food waste.

We also tackle the problem of waste crime, which cost the English economy around £600 million in 2016, harms local communities and which pays no heed to the value of scarce resources.

Our goal is to maximise the value of the resources we use, minimise the waste we create, cut emissions and help create a cleaner, greener, healthier planet."
Our plan is to become a world leader in using resources efficiently and reducing the amount of waste we create as a society. We want to prolong the lives of the materials and goods that we use, and move society away from the inefficient 'linear' economic model of 'take, make, use, throw'.

We recommend the South London Waste Plan review considers how it can help deliver this national strategy locally and increase the focus on reducing waste crime, use of plastic and reduce food waste across the plan area.

Independent review into serious and organised crime in the waste sector (November 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756526/waste-crime-review-2018-final-report.pdf

'Waste crime' takes many forms, including fly-tipping, illegal dumping or burning of waste, deliberate mis-description of waste, operation of illegal waste management sites, and illegal waste export. It has significant economic impacts: in 2015 illegal waste activity was estimated to have cost over £600 million in England alone. Some estimates put this at an even higher figure of £1 billion. (page 3)

The intentional mis-description of waste is widespread in the construction and demolition industry, with hazardous waste frequently labelled as 'inert' to avoid the highest band of landfill tax. In one case, involving a major, mixed-use development on a brownfield site in South London, the mis-description of over 1000 tonnes of hazardous waste led to it being transferred to sites lacking the controls to ensure its safe disposal. Not only did this present a serious environmental and public health risk; it also represented a tax avoidance of several million pounds. (page 16)

Given the ongoing high levels of regeneration and development across the plan area we recommend the South London Waste Plan review should consider how it can help tackle waste crime and deliver policies / guidance to address this serious environmental issue.

Given the scale of this environmental issue across London could the plan look at the need for Site Waste Management Plans being a policy requirement across the plan area to track and audit waste movements to prevent environmental damage.

Identify steps to ensure vacant sites (e.g. prior to demolition/planning permission) have high standards of security to protect them from illegal waste activities such as empty buildings being broken into and large amounts of wastes deposited and then abandoned. This could be a condition on new planning permissions to ensure the site is secured / protected and ensure the landowner is made aware they are responsible for any clean-up costs if waste is deposited on their site so understand the importance of good security measures to reduce waste crime.

Emerging new London Plan

The emerging new London Plan waste management policies promote a circular economy and managing waste within London's boundaries. This requires high quality and well maintained waste management infrastructure e.g. to manage waste from rising numbers of new residents being introduced into regeneration areas. https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan

We recommend a detailed assessment of the existing Local Authority Waste Management sites across Croydon, Kingston, Merton and Sutton and if they have sufficient capacity / are resilient to cope with a population across the boroughs and if not if new or extra waste management facilities are required in addition to the current sites.

For new or modernising waste management sites it's essential they are designed with high quality infrastructure following the latest environmental good practice on minimising dust, noise, pollution, drainage, fire risk, etc. and all waste activities are carried out in fully enclosed modern buildings.

If waste management sites are being lost to residential land uses an assessment should be made on what impact this will have across the borough and the cumulative impact of loss of waste management sites and how that will be managed

Detailed waste management sites feedback

We are reviewing the sites listed in Table 3.4 on Page 15 – 17 and are keen to discuss the latest information and evidence on existing waste management sites.

Some of the listed sites may require major infrastructure upgrade and in their current state may not be suitable unless infrastructure upgrade works are carried out urgently and permit compliance improved. We are keen to discuss process for annual reporting on compliance with Waste Permits and how this can be an indicator in the new South London Waste plan.

We are assessing the sites listed against the following criteria

Current environmental permit compliance rating – all sites with an Environment Agency permit are assessed from A to F with A being most compliant with the permit

conditions and F least compliant (see diagram below for compliance rating process). These compliance ratings are only based on the last detailed site visit and the current performance of the site could have improved / decreased.

Date site last visited by the Environment Agency – we aim to inspect all permitted waste sites at least once a year. Some sites will be visited more depending on compliance issues or environmental incidents. Poor performing sites will be prioritised to either comply with permit conditions or enforcement action taken to revoke the environmental permit.

Drainage issues on site?
Some sites have insufficient or poorly maintained drainage systems causing dust and mud to accumulate on site and mud to leave the site following lorry movements from sites. All waste management sites should be designed and operate to high environmental standards and we are keen to work with you to develop a checklist / guidance to cover this issue as part of the new South London Waste Plan.

Is the site within a "waste cluster"? Across the South London Waste Plan area there are a number of "clusters" of waste management sites which are

- Beddington Lane
- Weir Road
- Willow Lane

We are keen to organise some site visits to these cluster areas and will be in touch to organise some visits to learn more about the ongoing waste management issues and opportunities across the plan area.

We are also assessing, flood zone designation, Source Protection Zone, Air Quality Management Area, if the sites are currently enclosed or not, is there a main river on or adjacent to the site.

(2) Historic England: 21 October 2019

Historic England

[redacted]

Our ref: PL00622325
Date: 21/10/2019

[redacted]

RE: SA/SEA Scoping Report on new South London Waste (SLWP) 2021-36 dated September 2019

Thank you for consulting Historic England on the Sustainability Appraisal (SA) Scoping Report for the new South London Waste Plan (SLWP) 2021-36. We note that the SLWP covers the London boroughs of Croydon, Kingston, Merton and Sutton. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.

Historic England Advice

At this stage we do not consider that the SA Report adequately addresses the historic environment. The report provides a brief framework and much will depend on how it is taken forward. It is important that the SA/SEA process brings some additional understanding and rigour to Waste Development Plan Documents and, with this in mind you should consider expanding the historic environment baseline. While data on numbers of listed buildings and conservation areas are appropriate, it would be helpful to include commentary on other relevant, matters that relate to waste developments e.g. the nature of the archaeological resource, the character of the district's historic settlements and their potential vulnerability. It is important also that cultural heritage and townscape are not artificially separated – the strong link between conservation areas and townscape should be clear.

[redacted]

Historic England

Section 3: Current Waste Arisings and Capacity in South London

Is the proposed appraisal methodology set out in Section 3 sound and consistent with meeting the requirements of both SA and the SEA Directive?

Page 11 states that a Technical Paper has been prepared and that this paper sets out potential sites/areas which could help meet any capacity gap, either through the intensification of existing operations, or through the delivery of new sites. At this stage this site information has not been shared with us for comment. Any new proposals or site allocations need to carefully consider the impact on the surrounding historic environment, demonstrating that the impact can be adequately mitigated.

Section 5: Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

Have any relevant plans, programmes and sustainability objectives been omitted from Section 4 and the scoping table presented in Appendix 2?

We consider that Tasks A1-A5 set out in Section 4 of the SA Report are appropriate steps to take for this stage of the SA process.

There are a number of other relevant plans and programmes that should be included in section 5, as follows:

- UNESCO World Heritage Convention
- The European Convention on the Protection of Archaeological Heritage
- Convention for the Protection of the Architectural Heritage of Europe
- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979

The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on existing Conservation Area Appraisals and Management Plans from each of the participating London Boroughs. .

The Greater London Historic Environment Record (GLHER) should also be listed here given that it provides some of the most up-to-date information on the historic environment. The GLHER should also form part of the Plan's Baseline Evidence in section 6.

Historic England

Section 6: Baseline (Task A2)

Does the baseline information in Section 6 provide a complete picture of the environmental, economic, and social and equalities factors that need to be considered?

All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas.

The Scoping Report does set out data relating to the numbers of Conservation Areas, Scheduled Monuments and Registered Parks and Gardens located within the Plan area (table 6.59 pg. 76). Only the numbers of Listed Buildings at Risk are listed, we recommend that the overall numbers are also referenced. Helpfully, this table also makes reference to some non-designated heritage assets such as Areas of Special Local Character and Locally Listed Buildings. However, in order to ensure that the potential exhibited by non-statutory preceded archaeological sites is clearly represented at this high level, it would be helpful if this table included number of Archaeological Priority Areas (APAs) there are within each borough and the total area per borough they represent. Reference could therefore be made the draft London Plan and the APA review to the Tier model which will mean that all areas of a borough are assigned to one of four levels of archaeological significance. APAs indicate areas that have archaeological potential, and may contain as of yet undiscovered remains of potentially national interest. Given this the need for preservation in situ of archaeological evidence is not the preserve of Scheduled sites and so early engagement will be key to inform future design options or site selection.

Identification and mapping of APAs and heritage assets at risk can provide an indication of clusters and themes that will help identify sites and key issues surrounding their development.

The National Heritage at Risk Register should form part of the Baseline evidence. Other sources of evidence include:

- National Heritage List for England. www.historicengland.org.uk/the-list/
- Heritage Gateway. www.heritagegateway.org.uk
- GLHER Historic Environment Record.
- Heritage Impact Assessments looking into significance and setting.

[redacted]

Historic England

- Visual impact assessments.
- Archaeological assessments.
- Topic papers

Section 7: Key Sustainability Issues (Task A3)

Do the key sustainability issues outlined in Section 7 reflect all the significant social, economic and environmental factors relevant to the South London area?

It is regrettable that the historic environment is not recognised as a key sustainability issue in section 7. We note that heritage issues are amalgamated into Issue 14 *Townscape and Visual Amenity*, but this does not sufficiently cover all aspects of the historic environment. The conservation and enhancement of the historic environment is a key objective of sustainable development as set out in the NPPF, and as such we expect to see it recognised in the SA.

Section 8: Sustainability Appraisal Framework for the South London Waste Plan (task A4)

Does the proposed SA Framework set out in Section 8 identify an appropriate range of sustainability objectives, indicators and targets for the purpose of appraising and monitoring the significant effects of the plan and alternative options?

We raise considerable concern to the lack of a stand-alone objective on the historic environment in the Sustainability Appraisal Framework.

Objective 14: Townscape and Visual Amenity does try and incorporate historic environment issues but does not do this successfully. Notwithstanding our advice above, which is that standalone objective ion the historic environment is required, the Appraisal Questions to objective 14 are inappropriate. Potential adverse impacts should be avoided in the first instance whereas the appraisal question asks only for harm to be minimised suggesting that harm is built in as acceptable from the outset. No reference is made to the setting of heritage assets in the question or to Heritage at Risk.

The SA is the principle tool for monitoring the effects of the SLWP in operation. Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan's implementation. The Indicators set in the table on page 96 are not helpful as they cannot be easily measured. Indicators that monitor the numbers of entries either added or removed to HAR registers as a result of waste developments, or monitoring

Historic England

the effects of waste sites on the setting of designated heritage assets etc. would be more appropriate. Guidance on indicators and monitoring in respect of the historic environment can be found in advice note listed in the conclusion section of this letter.

Issues such as light pollution, noise, vibration and other disturbance from waste sites can have an adverse effect on residential amenity and biodiversity but this applies equally to the historic environment. Such disturbance can cause direct physical damage to historic buildings and sites both above and below ground, and greatly compromise their settings. It is advised that the SA recognises the impact that these less tangible influences can have upon the historic environment.

We advise that an additional Objective for the historic environment is added. We would suggest that the starting point for formulating Key Sustainability Issues for the Historic Environment should include:

- Conserving and enhancing designated and non-designated heritage assets (including archaeology) and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape /townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

It would be helpful if the SA included an objective to monitor how land could be restored once waste operations have been concluded on sites.

Appendix 1 – Glossary

Finally, there should be an entry for 'Historic Environment' with an interpretation that references both above and below ground designated and non-designated heritage assets.

The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.

[redacted]

Stonewall

Historic England

Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled.

Conclusion

Historic England has published guidance on Sustainability Appraisals that you may find helpful. This document contains details on baseline information, sustainability issues and objectives, indicators and monitoring:

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/

Other documents you may find helpful are:

The Setting of Heritage Assets - Good Practice Advice in Planning 3
https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/

The Historic Environment and Site Allocations in Local Plans - Advice Note 3
https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/

All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here: https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/

In preparation of the forthcoming SLWP, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a waste site, identification of heritage issues for a particular allocation does not automatically correspond

[redacted]

Historic England

to the support for inclusion of the alternative sites, given we have not yet been asked to assess the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Should you have any queries on the above, please do not hesitate to contact us.

Regards

[redacted]

(1) Natural England 17 October 2019

Date: 17 October 2019
Our ref: 295079
Your ref: London Waste Plan

NATURAL ENGLAND

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T 0300 060 3900

[redacted]

[redacted]

[redacted]

Planning Consultation: SA/SEA Scoping Report on new South London Waste (SLWP) Plan 2021-36

Thank you for your consultation on the above Strategic Planning Consultation, dated 16th September, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

[redacted]

Appendix 4

GLOSSARY

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

Glossary

Agricultural Waste
Waste from a farm or market garden, consisting of matter such as manure, slurry and crop residues

Anaerobic Digestion
Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be useful, for example biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used on farms as a fertiliser

Beneficial Use
The placement of excavation waste in a way that:
(1) provides environmental benefits, particularly in the restoration of priority habitats, flood alleviation or climate change adaptation/mitigation; or
(2) contributes towards the restoration of landfill sites or mineral workings

Circular Economy
Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: Design out waste and pollution; Keep products and materials in use; Regenerate natural systems (Ellen MacArthur Foundation)

Commercial Waste
Controlled waste arising from trade premises

Construction and Demolition Waste
Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

DEFRA - Department for Environment, Food and Rural Affairs
Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment

Energy from Waste
The conversion of waste into a useable form of energy, often heat or electricity

Environment Agency
A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice

Exemption
A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within

Hazardous Landfill
Sites where hazardous waste is landfilled. A dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste

Hazardous Treatment
Sites where hazardous waste is treated so that it can be landfilled

Hazardous Waste
Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste

HIC
Household, Commercial waste and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams

Historic Environment
Both above ground and below ground designated and non-designated historic assets.

Household Waste
Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and "bring sites"

Industrial Waste
Waste from a factory or industrial process

Inert waste
Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater

Inert Landfill
A landfill site that is licensed to accept inert waste for disposal

In-Vessel Composting
A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are many different systems, but they can be broadly categorised into six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls

ILW - Intermediate level radioactive waste
Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities

Local Authority Collected Waste (LACW)
Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials

Landfill
The permanent disposal of waste into the ground, by the filling of man-made voids or similar features

Landfill Directive
European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation

LLW – low level radioactive waste
Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

Materials Recycling Facility (MRF)
A facility for sorting and packing recyclable waste

Mechanical Biological Treatment (MBT)
Treatment of residual waste using a combination of mechanical separation and biological treatment

Non- Hazardous Landfill
A landfill which is licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet the relevant waste acceptance criteria

Non- Inert
Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change once landfilled

Organic Waste
Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

Open Windrow Composting
A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

Proximity Principle
Waste should be managed as near as possible to its place of production, reducing travel impacts

Recovery
Value can be recovered from waste by recovering materials through recycling, composting or recovery of energy

Recycled Aggregates
Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads

Recyclate
Raw material sent to, and processed in, a waste recycling plant or materials recovery facility (e.g. plastics, metals, glass, paper/card)

Recycling
The reprocessing of waste either into the same product or a different one

Residual Waste
Waste remaining after materials for re-use, recycling and composting have been removed

Waste Electrical and Electronic Equipment (WEEE)
End-of-life electrical or electronic equipment for the depollution, disassembly, shredding, recovery or preparation for disposal of this waste must meet the EU's WEEE Directive.

Waste Hierarchy
A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal

Waste Local Plan
A statutory development plan prepared (or saved by the waste planning authority, under transitional arrangements), setting out polices in relation to waste management and related developments

Waste Management
Processes by which waste is reused, recycled or recovered. It does not include waste transfer (where waste is sorted and baled) or landfill

Waste Minimisation / Reduction
The most desirable way of managing waste, by avoiding the production of waste in the first place

Waste Planning Authority (WPA)
The local authority responsible for waste development planning and control. They are unitary authorities, including London Boroughs and the City of London, National Park Authorities, and county councils in two-tier areas
The WPAs for the South London Waste Plan are
- London Borough of Croydon;
- Royal Borough of Kingston;
- London Borough of Merton; and
- London Borough of Sutton

Waste Regulation Authority
The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

Waste Transfer
Processes by which waste is sorted or baled prior to transfer to another place for reuse, recycling, recovery or disposal. Although in practice, usually some reuse, recycling and recovery occurs in the sorting and baling.

Waste Treatment
All processes for waste management (see above) and waste transfer (see above)

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