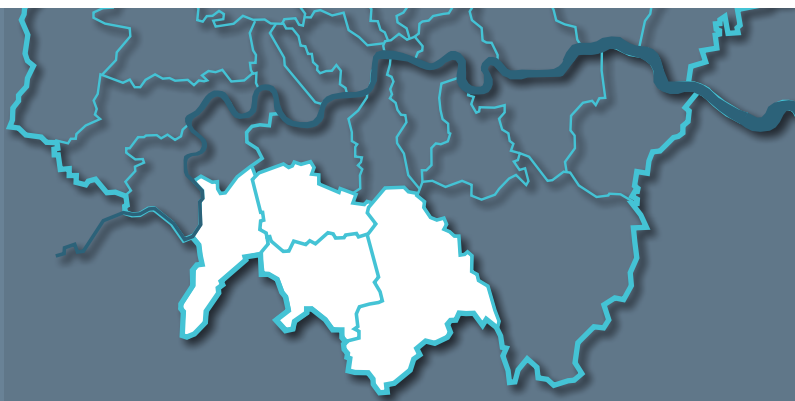


- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London Waste Plan



Sustainability Appraisal (SA) Appendices
incorporating Strategic Environmental Assessment (SEA)
on Issues and Preferred Options

October 2019

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Appendix 1

EQUALITIES IMPACT ASSESSMENT (EqIA) SCREENING REPORT ON SOUTH LONDON WASTE PLAN ISSUES AND PREFERRED OPTIONS DOCUMENT

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1 BACKGROUND

Introduction

1.1 This Equalities Impact Assessment (EqIA) screening report assesses the potential implications of the draft policies set out in the South London Waste Plan (SLWP) Issues and Preferred Options document on each of the equality target groups within the four partner boroughs. It has been published alongside the sustainability appraisal (SA) Report for public consultation for a period of 8 weeks between 31 October and 22 December 2019.

What is an EqIA?

1.2 An EqIA is defined by the Equality and Human Rights Commission⁷³ 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.

1.3 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 with this duty.

1.4 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.

Legislation

1.5 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

1.6 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

1.7 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.

⁷³ see <http://www.equalityhumanrights.com>

Equality Act 2006

1.8 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)

1.9 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 existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

Equality Act 2010

1.10 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.

1.11 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.

1.12 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.

1.13 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

1.14 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 and Community Cohesion Strategy 2016-2020

1.15 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 Strategy Policy 2017-2021

1.16 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 and Diversity Framework 2019-20 to 2023-24

1.17 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

1.18 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

3.2 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

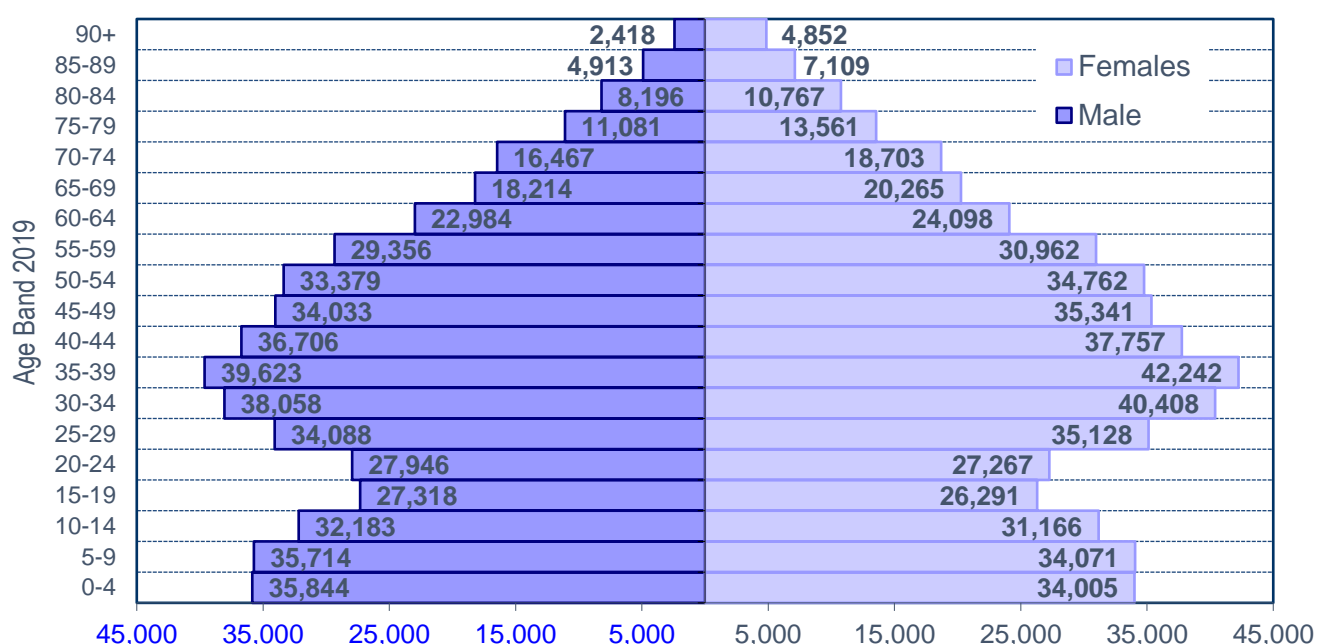
Women, older people, young people and children

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	45,403 (23.5%)	43,440 (21.3%)	88,842 (22.4%)
	Borough residents aged 16-64	123,444 (64.0%)	130,582 (64.2%)	254,025 (64.1%)
	Borough residents aged 64+	24,159 (12.5%)	29,520 (14.5%)	53,680 (13.5%)
	Total	193,006	203,542	396,548
	Age band	Males	Females	All persons
Kingston	Borough residents aged 0-15	18,342 (20.5%)	17,875 (19.6%)	36,218 (20.1%)
	Borough residents aged 16-64	59,829 (66.9%)	59,722 (65.5%)	119,552 (66.2%)
	Borough residents aged 64+	11,300 (12.6%)	13,529 (14.8%)	24,831 (13.7%)
	Total	89,470	91,128	180,598
	Age band	Males	Females	All persons
Merton	Borough residents aged 0-15	22,663 (21.9%)	21,786 (20.4%)	44,450 (21.1%)
	Borough residents aged 16-64	69,373 (66.9%)	70,358 (65.9%)	139,733 (66.4%)
	Borough residents aged 64+	11,663 (11.2%)	14,607 (13.7%)	26,271 (12.5%)
	Total	103,701	106,751	210,452
	Age band	Males	Females	All persons
Sutton	Borough residents aged 0-15	23,060 (22.5%)	21,771 (20.3%)	44,826 (21.4%)
	Borough residents aged 16-64	65,108 (63.6%)	67,964 (63.3%)	133,065 (63.5%)
	Borough residents aged 64+	14,167 (13.8%)	17,601 (16.4%)	31,770 (15.2%)
	Total	102,332	107,335	209,666
	Age band	Males	Females	All persons
SLWP area	Residents aged 0-15	109,468 (22.4%)	104,872 (20.6%)	214,336 (21.5%)
	Residents aged 16-64	317,754 (65.0%)	328,626 (64.6%)	646,375 (64.8%)
	Residents aged 64+	61,289 (12.5%)	75,257 (14.8%)	136,552 (13.7%)
	Total	488,509	508,756	997,264

Sources: GLA 2016-based Trend Projections; GLA 2016-based Housing Led Projections; and ONS 2016-based Population Projections

Figure 2.1: Population structure by gender and age band for the plan area 2019



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 2015) - national ranking

	Social deprivation ranking compared to the 326 areas in England ⁷⁴		
	IMD 2010	IMD 2015	Change 2010-15
Croydon	107 th	96th most deprived in England	
Kingston	255 th	278th most deprived in England	
Merton	208 th	213th most deprived in England	
Sutton	196 th	215th most deprived in England	

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2015

Table 2.7: Index of Multiple Deprivation (IMD 2015) - London ranking

	Social deprivation ranking compared to the 33 London Boroughs		
	IMD 2010	IMD 2015	Change 2010-15
Croydon	20 th	17th most deprived in London	
Kingston	28 th	28th most deprived in London	No change
Merton	29 th	29th most deprived in London	No change
Sutton	31 st	32th most deprived in London	

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2015

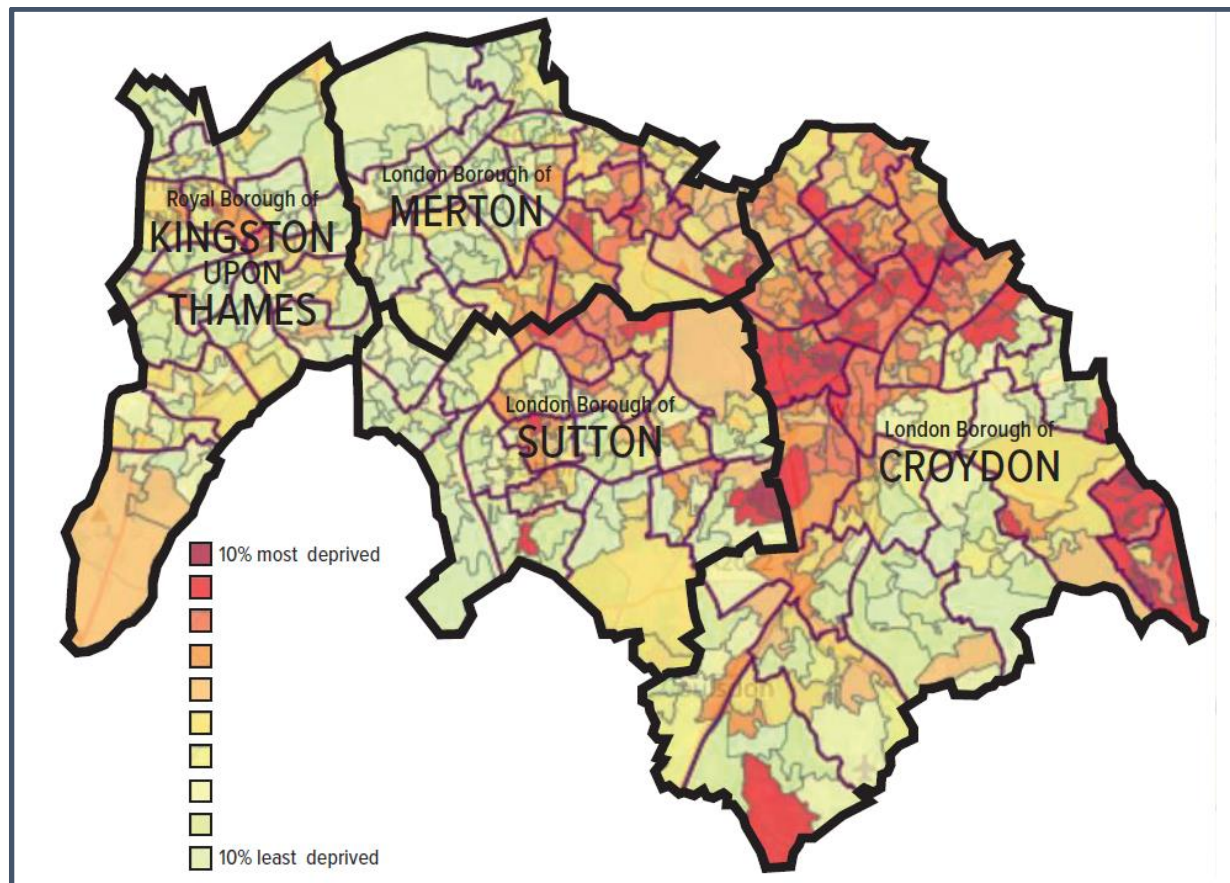
Table 2.8: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England

	IMD 2015 – 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	6	47	28	7
Kingston	0	1	38	16
Merton	0	4	40	16
Sutton	1	7	39	17

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2015

⁷⁴ based on IMD 2015 'rank of average score' (1st = most deprived and 326th = least deprived)

Figure 6.8: Index of Multiple Deprivation (IMD 2015) map for SLWP area⁷⁵



⁷⁵ showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)

3 METHODOLOGY

EqlA Stage One: Screening

3.3 The EqlA Screening process considers the potential impact of the eight draft policies (Policies WP1-WP8) set out in the SLWP Issues and Preferred Options document on each of the target equality groups identified in Table 2.1 of this report. Two possible impacts are considered as part of this process:

- **Positive or beneficial impact:** The issue/ option will have a positive effect on one or more of the equality target groups or, improve equal opportunities and/or relationships between groups; and
- **Negative or adverse impact:** The issue/option could have a negative/ adverse impact on one or more of the equality target groups.

3.4 The initial assessment of potential impacts on target equality groups presented in this report is based on GLA guidance⁷⁶ and the available EqlA guidance documents and policy statements of the four South London Boroughs.

EqlA Stage Two: Full EqlA

3.5 A full EqlA of the South London Waste Plan will be required if the screening stage identifies any potential negative impacts falling into one of the following categories::

- high significance;
- not intentional; and
- illegal or possibly illegal.

3.6 This stage of the process requires a more detailed assessment of the possible negative impacts and allows for consultations with key stakeholders. Public consultation on the full EqlA should be accessible to all members of the target groups likely to be affected by the Plan, particularly those who are under represented or 'hard to reach'. The consultation process should therefore aim to follow the principle of 'going out to them' rather than 'expecting them to come to you'.

3.7 In the case of the SLWP, those organisations representing minority groups in the locations potentially affected would need to be targeted and discussions about the EqlA should be brought to established minority group meetings and places where minority groups attend e.g. playgroups, cultural centres, advice bureaux etc. In addition, additional workshops/exhibitions may be set up and advertised to attract certain minority groups.

3.8 The outcome of the full EqlA would lead to the preparation of an action plan aimed at minimising any negative impacts and maximising any positive impacts arising from the South London Waste Plan. The action plan would need to incorporate a monitoring framework as the basis for reviewing the effects of plan implementation on each of the targeted equality groups.

3.9 While it should be recognised that many of the above equality target groups may overlap and have similar needs it is not always the case that all members of one particular target group will always share the same needs

⁷⁶ Equality Impact Assessments: How to do Them' (GLA, November 2003)

4 EQUALITIES SCREENING ASSESSMENT

EqlA criteria

4.1 Table 4.1 sets out the EqlA criteria as the basis for assessing the potential impacts of emerging South London Waste Plan (SLWP) policies upon each equality target group.

Table 4.1 EqlA criteria

EqlA Criteria
<i>Will the policy or proposal have beneficial or adverse impacts for women?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for black and minority ethnic (BAME) groups or faith groups?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for older people?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for young people and children?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for disabled people and people with a limiting long-term illness?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for lesbians, gays, bisexuals and/or transgendered people (LGTB groups)?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for people affected by social deprivation?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for gypsies and/or travellers?</i>

EqlA Screening Matrix and Scoring system

4.2 The outcome off EqlA Screening in relation to the draft policies set out in the SLWP Issues and Preferred Option document are presented in the Screening Matrix below. 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 4.1

Figure 4.1: Scoring system for use in EqlA 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 SCREENING MATRIX: IMPACTS OF DRAFT 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 MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE								
OPTION 1: PREFERRED POLICY (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 Draft 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 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: SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward existing policy	?	?	+ ?	+ ?	+ ?	?	+ ?	+ ?
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES	X	X	XX	XX	XX	X	XX	XX
OPTION 3: DO-NOTHING This option would involve not replacing the current SLWP 2012 and allowing it to expire in 2021	X	X	XX	XX	XX	X	XX	XX
Draft 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: <ul style="list-style-type: none"> • 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.								

	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 WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE								
OPTION 1: PREFERRED POLICY (a) Development that results in the intensification of existing sites to provide additional Construction and Demolition waste management capacity will be supported, subject to Policy WP3(b). (b) New sites (either transfer or management) for Construction and Demolition waste should be for compensatory provision only (see Policy WP3). (c) New sites (either transfer or management) will not be supported for radioactive waste, agricultural waste and hazardous waste. (d) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.	+	++	++	++	++	+	++	++
OPTION 2A: SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward Policy WP2 from existing SLWP 2012	+ ?	+ ?	+ ?	+	+	+?	+	+
OPTION 2B: SAFEGUARD EXISTING SITES & IDENTIFY NEW SITES Allow C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where identified need.	+ ?	+ ?	+ ?	+	+	+?	+	+
OPTION 3: DO-NOTHING This option would involve not replacing the current SLWP 2012 and allowing it to expire in 2021	X	XX	XX	XX	XX	X	XX	XX
Draft 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: <ul style="list-style-type: none"> 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 <p>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 the development of new C&D sites.</p> <p>Policy WP2 is expected to have less significant beneficial effects on Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers broadly in line with the wider community.</p>								

	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								
OPTION 1: PREFERRED POLICY (a) The sites set out on Pages 42-90 of this South London Waste Plan will be safeguarded for waste uses only. (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this SLWP and the relevant borough's Development Plan. Safeguarding Compensatory Provision (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis. (d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted. (e) Any development on an existing safeguarded waste 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.	++?	++?	+++?	+++?	+++?	++?	++?	+++?
OPTION 2: CARRY FORWARD POLICIES WP3 & WP4 FROM SLWP 2012 Retaining the broad industrial areas in Schedule 2 of the SLWP 2012 for potential waste development together with existing safeguarded waste sites	?	?	+ ?	+ ?	++?	?	?	+ ?
OPTION 3: 'DO-NOTHING' SCENARIO This would involve not replacing the current SLWP 2012 and thus allowing Policies WP3 and 4 to expire in 2021	x?	x?	x	x	x	x?	x?	x
Draft 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: <ul style="list-style-type: none"> • 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 <u>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.</u> • 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								
OPTION 1: PREFERRED POLICY New 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 (eg Green Belt or Metropolitan Open Land); (ii) are located more than 100 metres from open space; (iii) are located outside Groundwater Source Protection Zones (i.e. 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 to be considered in assessing site suitability; (f) Meet the other policies of the relevant borough's Development Plan.	+	+	++	++	++	+	+	++?
OPTION 2: CARRY FORWARD POLICY WP5 FROM SLWP 2012 Retaining the development management criteria' in current Policy WP5	+?	+ ?	++?	++?	++?	+ ?	+ ?	+?
OPTION 3: 'DO-NOTHING' SCENARIO Not replacing the current SLWP and thus allowing Policy WP5 to expire in 2021	X	X	XX	XX	XX	X	X	XX?
Draft 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: <ul style="list-style-type: none"> • 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 Draft Policy WP4 will have less significant beneficial effects on Women; BME/Faith groups; LGTB and 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								
OPTION 1: PREFERRED POLICY								
<p>(a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed & managed to achieve levels that will not significantly adversely affect people and the environment.</p> <p>(b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.</p> <p>(c) Particular regard will be paid to:</p> <p>(i) The Green Belt, Metropolitan Open Land, recreation land or similar;</p> <p>(ii) Biodiversity etc;</p> <p>(iii) Archaeological sites, the historic environment and sensitive receptors, etc;</p> <p>(iv) Groundwater, surface water etc;</p> <p>(v) Air emissions, including dust, arising from the on-site operations, plant and traffic ;</p> <p>(vi) Noise and vibration etc;</p> <p>(vii) Traffic generation, access and the suitability of the highway network etc;</p> <p>(viii) Odour, litter, vermin and birds; and,</p> <p>(ix) The design of the facility, etc.</p>	+	+	++	++	++	+	+	++?
OPTION 2: CARRY FORWARD POLICY WP7 FROM SLWP 2012	+?	+ ?	+ ?	+	+	+	+	+
Retaining the criteria set out in relation to 'windfall sites' in Policy WP5								
OPTION 3: 'DO-NOTHING' SCENARIO								
Allowing Policy WP5 to expire in 2021	X	X	XX	XX	XX	X	X	X
<p>Draft 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:</p> <ul style="list-style-type: none"> 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 								
Draft 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								
OPTION 1: PREFERRED POLICY (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme...etc. (b) Waste facilities will be required to: <ul style="list-style-type: none"> (i) minimise on-site carbon dioxide emissions in accordance with the Draft London Plan Policy SI2; (ii) be fully adapted and resilient to the future impacts of climate change etc (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate etc; (iv) make a more efficient use of resources and reduce the lifecycle impacts of materials; (v) minimise waste and promote sustainable management of construction wastes on site; and, (vi) protect, manage and enhance local habitats and biodiversity. 	++	+	++	++	++	+	+	++?
OPTION 2: CARRY FORWARD POLICY WP6 FROM SLWP 2012 This would involve retaining the sustainable design and construction requirements set out in existing Policy WP6	+	+	+	+	+	+	+	+
OPTION 3: 'DO-NOTHING' SCENARIO This would involve not replacing the current SLWP 2012 and allowing Policy WP6 to expire in 2021	XX	X	XX	XX	XX	X	XX	XX
Draft 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: <ul style="list-style-type: none"> 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. <p>Draft 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.</p>								

	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								
OPTION 1: PREFERRED POLICY								
(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, and apprenticeship opportunities.								
OPTION 2: CARRY FORWARD POLICY WP8 FROM SLWP 2012								
This would continue to permit energy recovery developments within the South London Waste Plan area subject to a number of criteria in relation to:								
(i) demonstrate that the waste cannot be practicably be reused or recycled	+	+	+	+	+	+	+	+
(ii) achieving a positive carbon outcome;								
(iii) the delivery of renewable heat and power for local users								
(iv) minimising potential adverse impacts on human health, local amenity and the environment								
OPTION 3: 'DO-NOTHING' SCENARIO								
This would involve not replacing the current SLWP 2012 and allowing Policy WP8 to expire in 2021	X		X	X	X			X
Draft 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: <ul style="list-style-type: none">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) facilitiesensure 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								

	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 WP8: 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: CARRY FORWARD POLICY WP9 FROM SLWP 2012								
This is unchanged	+	+	+	+	+	+	+	+
OPTION 3: 'DO-NOTHING' SCENARIO								
This would involve not replacing the current SLWP 2012 and allowing Policy WP8 to expire in 2021	?	?	?	?	?	?	?	?
Draft Policy WP8 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.								

5. CONCLUSIONS

5.1 The outcome of EqIA screening set out in this report show that the draft policies set out in the SLWP Issues and Preferred Options document are expected to have a number of potentially 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.

5.2 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 (NO₂) 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

5.3 In addition, where appropriate policy measures are not taken to address both the causes of climate change by reducing CO₂ emissions from waste management operations and associated transport 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.

5.4 Overall, the EqIA screening matrix shows that the 'preferred' strategic approach to the management of future waste arisings within south London, embodied by draft Policies WP1-WP8 (Option 1), is likely to 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 (thus providing local employment opportunities);

- 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 co-location of 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 generally more vulnerable to the adverse health and social impacts of road transport compared to the wider community.

5.5 Overall, 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.

Next Steps

5.6 This EqIA Screening Report, which accompanies the Sustainability Appraisal (SA) report (as Appendix 1) is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from **Thursday 31 October to Sunday 22 December 2019**. Copies are available at the following locations:

- <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sl-waste-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.

5.7 Hard copies of the documents are also available at council offices and public libraries across the four boroughs.

5.8 The preferred waste plan will take into account the feedback received to both the Interim SA Report and the EqIA Screening Report.

5.9 **A full EqIA Report will be prepared at the next stage in support of the Proposed Submission Draft Waste Plan, which is scheduled for public consultation from May 2020**

Appendix 2

HABITATS REGULATIONS SCREENING (APPROPRIATE ASSESSMENT) SOUTH LONDON WASTE PLAN ISSUES AND PREFERRED OPTIONS DOCUMENT

Background to Habitats Regulations Assessment

1. The requirement for public authorities to undertake Habitats Regulations Assessment (HRA) plans or projects (sometimes termed 'Appropriate Assessment') 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').
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 'appropriate assessment' (AA) 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.
3. Further to this, Article 6(4) states that where an appropriate assessment 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.
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.
5. The purpose of undertaking AA 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 AA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section⁷⁷ (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A -85E) which requires local planning authorities to undertake AA of land use plans in England and Wales in accordance with the Directive.

European sites potentially affected by the new SLWP

6. 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).
7. Map 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

Proposed approach to HRA screening

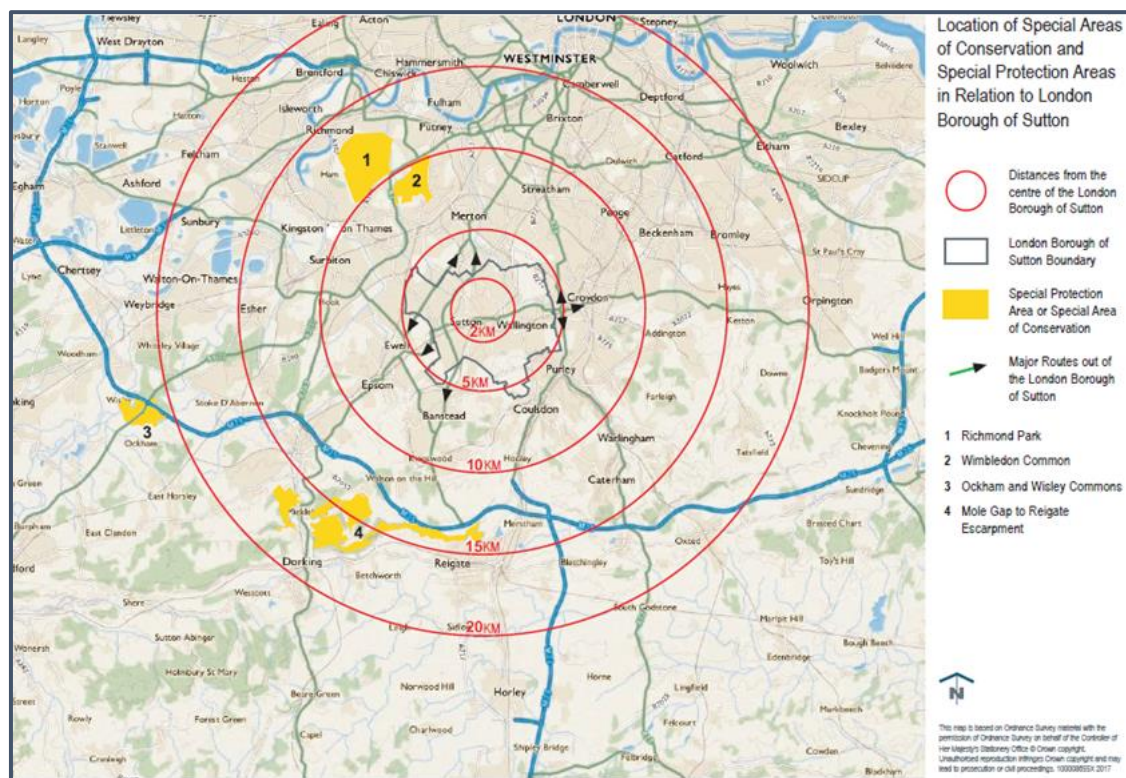
8. It is understood that Natural England are now in a position to offer formal HRA screening advice to local planning authorities (including joint authorities). It is therefore proposed that a formal HRA screening request be submitted to Natural England prior to the next stage of consultation on the new plan. Further consideration will be given to the specific conservation objectives of each of the four sites in finalising the HRA screening request
9. Should a full HRA be required, this will be prepared as part of the SA Report on the Proposed Submission in May 2020.

⁷⁷ Entitled 'Appropriate Assessments for Land Use Plans in England and Wales'.

Initial screening considerations

10. While a formal HRA screening assessment has yet to be completed, at this stage it is considered very unlikely that a full HRA will need to be prepared for the new waste plan for the following reasons:

- no new waste management sites are currently proposed to be safeguarded in the emerging SLWP preferred option 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 NO₂ 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 Issues and Preferred Options document 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)..



Appendix 3

RESPONSES TO SA SCOPING REPORT ON SOUTH LONDON WASTE PLAN

(1) Environment Agency: 28 October 2019

creating a better place
for people and wildlife



Patrick Whitter
Senior Planner
Strategic Planning Team
Environment, Housing and Regeneration
London Borough of Sutton
24 Denmark Road,
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SM5 2JG

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.

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gov.uk/environment-agency

-
- 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**

Environment Agency, Rivers House, Bazalgette Way, London, SE2 9AN
email: southlondonwaste@environment-agency.gov.uk

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>

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- 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.

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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

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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

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Our ref: PL00622325
Date: 21/10/2019

By email: patrick.whitter@sutton.gov.uk

Dear Patrick.

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.



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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.



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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.



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- 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 on 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



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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.



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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



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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

Historic Environment Planning

Advisor _____



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Date: 17 October 2019
Our ref: 295079
Your ref: London Waste Plan



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Dear Mr Whitter

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

Operations Delivery
Consultations Team

Appendix 4

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

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, Demolition & Excavation 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 policies in relation to waste management and related developments

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

Waste Regulation Authority

The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

Waste Transfer Station

A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal. Although, in practice, usually some recycling and management takes place as part of the sorting or baling.

