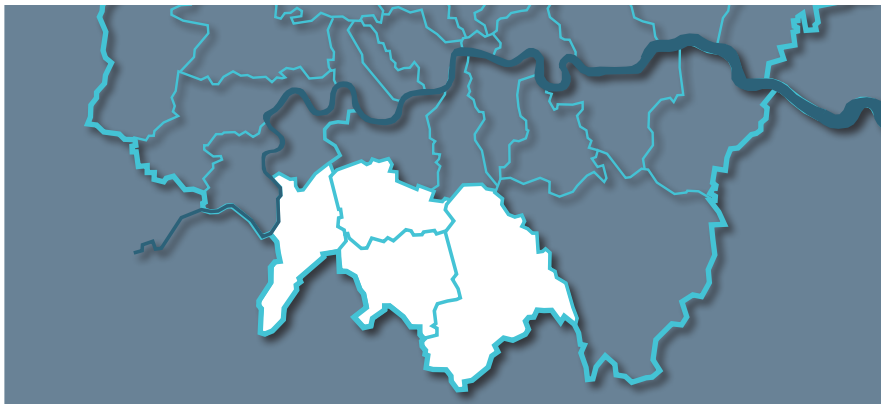
- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London **Waste Plan**

Sustainability Appraisal (SA)

incorporating Strategic Environmental Assessment (SEA)

on Issues and Preferred Options

October 2019

CROYDON
www.croydon.gov.uk

THE ROYAL BOROUGH OF KINGSTON UPON THAMES

merton

Sutton

South London Waste Plan 2021-36

SUSTAINABILITY APPRAISAL REPORT

incorporating Strategic Environmental Assessment (SEA) and
Equalities Impact Assessment (EqIA)
on

Issues and Preferred Options

October 2019

Executive Summary

This SA Report on the South London Waste Plan (SLWP) Issues and Preferred Options document provides a comprehensive review of current and future waste arisings within the plan area; existing waste management sites, throughput and capacity; national, sub-regional and local policies; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the draft policies and proposed waste sites on each of the sustainability objectives making up the SA Framework.

The report meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in national planning practice guidance and the SEA regulations respectively, and has been published to inform consultation on the Issues and Preferred Options document from 31 October to 22 December 2019. It also builds upon the previous SA Scoping Report published in July 2019 by taking account of comments from the Environment Agency, Natural England and Historic England and refining the SA Framework accordingly.

The SA Matrix in Section 12 demonstrates that draft Policies WP1-WP8, which have been developed by the four partner boroughs as the 'preferred' strategy for the new SLWP for 2021-36 (Option 1), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

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

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

In due course, stakeholder feedback arising from the issues and preferred options consultation stage will inform the preparation of the SLWP Proposed Submission document which is scheduled for publication in May 2020. This will be accompanied by a further SA Report incorporating a full Equalities Impact Assessment (EqIA).

Contents

1 INTRODUCTION

Purpose of the new South London Waste Plan

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

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

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

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

Figure 1.1: The South London Waste Plan area

1.4 An Issues and Preferred Options consultation document for the preparation the new SLWP 2021-2036 has now been published for public consultation between Thursday 31 October and Sunday 22 December 2019 in order to meet the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.5 This sustainability appraisal (SA) report, incorporating strategic environmental assessment (SEA), Equalities Impact Assessment (EqIA) and Habitats Regulations Screening, has been published for consultation alongside the Issues and Preferred Options document.

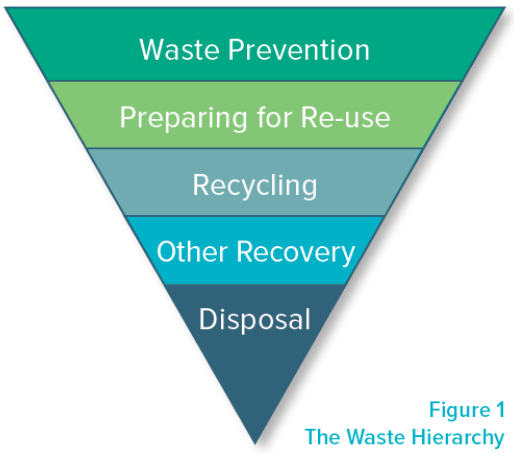
[1] the current South London Waste Plan 2012 is available at https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view

National planning policy requirements

1.6 The National Planning Policy for Waste[2] (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:

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

Figure 1.2: The Waste Hierarchy



[2] the NPPW is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

Apportionment targets

1.7 The draft London Plan (GLA, December 2017)[3] with minor suggested changes (July 2018) and further suggested changes (March 2019) includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):

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

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

Table 1.1: Apportionment targets for South London in the Draft London Plan 2017

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

Requirement for Sustainability Appraisal

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

What is sustainable development?

1.10 The UK Sustainable Development Strategy (ODPM[4], 2005) defines sustainable development as *"enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations".* The Strategy is based on the following guiding principles:

(1) Living within Environmental Limits

Respecting the limits of the planet's environment, resources and bio-diversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.

[3] the draft London Plan 2017 is available at https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan
[4] [4] the former Office for the Deputy Prime Minister

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

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

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

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

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

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

Purpose of sustainability appraisal

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

1.13 SA reports on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development. By identifying key issues, developing policies and proposals and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable plans which are evidence-based. In the context of waste planning, the

appraisal process can help planners and the public gain a better understanding of how well-designed waste facilities in the right locations can deliver long-term benefits for local environmental quality, promoting the circular economy and community well-being.

1.14 To be effective, SA must be

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

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

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

Consultation on SA Scoping Report

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

1.18 Its purpose was to define the scope of the appraisal and provide the basis for appraising the potential effects of alternative waste management policies against a range of environmental, social and economic objectives.

1.19 Responses to consultation on the SA Scoping Report have been received from the Environment Agency (28 October 2019); .Historic England (21 October 2019); and Natural England (17 October 2019) and as far as possible the comments received have been incorporated within this SA Report. Consultation responses on the SA Scoping Report are

Coverage of SA Report on Issues and Preferred Options

1.20 This document is the SA Report on SLWP Issues and Preferred Options (incorporating SEA, EqIA and Habitats Regulations Screening) for the new SLWP 2021-36. Its purpose is to assess the likely effects of preferred planning policies and strategic alternatives against each of the environmental, social and economic objectives making up the agreed SA Framework.

1.21 The following chapters address each of the key requirements for SA/SEA set out in government guidance and best practice within the context of current and future waste

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

- **Section 2** describes the background to the new **South London Waste Plan (SLWP)** in terms of current and future waste arisings within the plan area, and existing and potential waste management sites across the four borough drawing upon updated evidence set out in the 'South London Waste Technical Paper' prepared by Anthesis consultants on behalf of the four boroughs in June 2019;
- **Section 3** reviews **Current Waste Arisings and Capacity in South London**;
- **Section 4** outlines the main stages of **Sustainability Appraisal and Strategic Environmental Assessment** drawing upon government guidance and best practice;
- **Section 5** reviews other **Relevant Plans, Programmes and Sustainability Objectives** at the national, regional and local levels **(Task A1**)[5];
- **Section 6** sets out **Baseline** information for South London, in terms of the key social economic and environmental trends likely to be influenced by the plan **(Task A2)**;
- **Section 7** identifies the key **Sustainability Issues** to be addressed by the SLWP **(Task A3)**;
- **Section 8** sets out the proposed **Sustainability Appraisal Framework** consisting of the key sustainability objectives, indicators and targets against which the likely effects of the Plan and alternative options will be appraised **(Task A4)**; and
- **Section 9** describes the process by which **Potential Waste Sites** have been identified and assessed as part of the evidence gathering stage. This chapter should be read in conjunction with the more detailed assessment set out in the 'South London Waste Technical Paper[6] and accompanying Appendices prepared by Anthesis consultants on behalf of the four boroughs in June 2019 **(Task A5)**; and
- **Section 10** describes the development of **Preferred SLWP Policies** and defines the strategic alternatives for the purpose of appraisal **(Task A5)**; and
- **Section 11** analyses the **Compatibility of the Proposed Vision and Objectives against each of the Sustainability Appraisal Framework Objectives (Tasks B1)**
- **Section 12** sets out the **Results of Appraisal** for each of the draft policies (Policies WP1-WP8) and waste management sites set out in the SLWP Issues and Preferred Options document **(Tasks B3, B4 and B5)**
- **Section 13** sets out the **Conclusions (Task A5).**

Equalities Impact Assessment (EqIA)

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

[5] in line with best practice, a comprehensive scoping table will be provided as part of the next SA/SEA Report on SLWP Issues and Preferred Options which will be published for public consultation from 31 October to 22 December 2019
[6] the South London Waste Technical Paper and accompanying Appendices are available at www.sutton.gov.uk/currentconsultations

Equality Act 2010 removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to "give due regard" to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

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

1.24 Accordingly, an EqIA Screening report on SLWP Issues and Preferred Options is included in this document as Appendix 1.

Habitats Regulations Assessment (Appropriate Assessment)

1.25 The need for habitats regulations assessment[7] (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive') as set out in the Conservation of Habitats and Species Regulations 2010 (as amended). The Regulations seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

1.26 Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects. The outcome of habitats regulations screening is set out in Appendix 2.

Sequential test (flood risk)

1.27 The updated national planning policy framework (NPPF) requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Development plan documents should therefore apply a sequential, risk-based approach to designating sites in order to avoid flood risk to people and property and manage any residual risk, taking account of climate change, by applying the 'sequential test' and if necessary, applying the 'exception test' to all potential development sites in line with technical guidelines[8] set out in the NPPG.

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

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

[7] HRA is also referred to as 'Appropriate Assessment'
[8] formerly set out in the Government's Planning Policy Statement on Development and Flood Risk (PPS25) (now cancelled)

1.29 According to the Government's flood risk vulnerability classifications[9], waste treatment facilities fall within the 'less vulnerable' category, with the exception of landfills and hazardous waste facilities, which are classified as 'more vulnerable'. Therefore, based on the government's flood risk vulnerability and flood zone compatibility table, the vast majority of waste sites (which do not involve hazardous waste or landfilling operations) are compatible with all EA flood zones up to and including Flood Zone 3a (high risk). However a newly proposed site allocation or planning application for a hazardous waste facility located within Flood Zone 3a (high risk). Environment Agency (EA) must pass the exceptions test and should not permitted at all within Flood Zone 3b.

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

1.31 Since no new waste sites are being put forward at this stage of the preparation of the new SLWP and in view of the fact that all of the existing safeguarded sites within the plan area have previously been subject to the sequential and exceptions test as part of the preparation of the current SLWP 2011-21, it is considered that it is unnecessary to include a sequential test report as part of this document. However, a full sequential test and exceptions test report will be prepared in liaison with the EA for inclusion as part of the next SA report on the proposed Submission SLWP.

Consultation arrangements

1.32 This SA report 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.**

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

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

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

[9] see Table 3 at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone__compatibility_.pdf

2 BACKGROUND TO THE SOUTH LONDON WASTE PLAN

Current arrangements for waste collection and disposal

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

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

2.3 Each borough's function as a waste planning authority is outlined in National Planning Policy for Waste[10] (NPPW) (DCLG, 2015) which requires that waste planning authorities identify sufficient sites to accommodate both municipal solid waste (MSW) arisings, which is related to the collection and disposal function, and commercial and industrial waste arisings identified in the regional spatial strategy (i.e. the London Plan 2016). This is the purpose of the South London Waste Plan.

South London Waste Partnership

2.4 There are many advantages to joint working on a sub-regional level. Waste arisings rarely remain within individual borough boundaries and joint working can also achieve financial savings for individual boroughs. Accordingly, the four South London boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames formed the South London Waste Partnership (SLWP) in order to jointly procure waste treatment and disposal contracts for municipal waste. As the disposal authority for household waste collected by the four South London Boroughs, the SLWP adopted a joint Municipal Waste Management Strategy[11] (JMWMS) for South London in 2011 covering the period 2010-20 with the aims of:

- minimising the climate change impact of managing municipal solid waste (MSW) through effective and efficient diversion from landfill;
- working at a sub-regional level to deliver cost effective and environmentally sound waste management services; and
- working towards conformity with the Waste Strategy for England 2007[12] and the London Municipal Waste Management Strategy.

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

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

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

The current South London Waste Plan 2012

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

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

Year	Combined municipal (MSW) and Commercial & Industrial (C&I) waste apportionment
2010	854,000 tonnes
2015	1,130,000 tonnes
2020	1,332,000 tonnes
2021[13]	1,326,000 tonnes

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

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

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

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

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

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

prepared by Anthesis consultants on behalf of the four boroughs in June 2019.

2.13 The SLWP plan period is now coming to an end and a new waste plan is required in order to meet the Mayor's updated apportionment targets from 2021 to 2041 in the draft London Plan (GLA, December 2017) and a range of other sustainable waste management targets set out in the Mayor's Environment Strategy (GLA, 2018).

The new South London Waste Plan 2021-36

2.14 The current timescale for the preparation of the new SLWP 2021-36 is set out below in Table 2.2:

Table 2.2: Timetable for preparing and consulting on the new South London Waste Plan

Plan-making stage	Timescale
Evidence gathering	October 2018 onwards
Consultation with relevant bodies on SA Scoping Report	16 September-21 October 2019
Public consultation on SLWP Issues and Preferred Options, SA/SEA Report and EqIA	31 October-22 December 2019
Public consultation on the proposed Submission Draft, SA/SEA Report and EqIA	May 2020
Submission of the new SLWP to Secretary of State	August 2020
Examination in Public	January 2021
Inspector's Report	March 2021
Adoption	July 2021

2.15 The Issues and Preferred Options document, which has been published for public consultation throughout the plan area, will explore the following key aspects that the Plan will need to address:

- **Issue 1:** The Vision and Objectives of the new South London Waste Plan
- **Issue 2:** Self sufficiency - how much of our waste should we deal with?
- **Issue 3:** Distribution of waste management sites
- **Issue 4:** The need for new and/or intensified waste management facilities
- **Issue 5:** Where should the new facilities be located?
- **Issue 6:** How can the new plan promote the circular economy in south London?
- **Issue 7:** How can the new plan address climate change and minimise impacts?
- **Issue 8:** Implementing the Plan.

2.16 The key sustainability issues identified in this document will help to shape the strategic choices, potential waste management sites/ broad locations and revised site criteria to be set out in the issues and options document.

2.17 To inform consultation, a further SA/SEA report incorporating EqIA will be prepared alongside the Proposed Submission draft in May, to evaluate the possible implications of each potential site and policy option on the sustainability objectives, indicators targets making up the proposed SA Framework (see Section 8).

3 CURRENT WASTE ARISINGS AND CAPACITY IN SOUTH LONDON

Evidence gathering

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

3.2 The Technical Paper includes the following outputs:

Policy context

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

Waste arisings and forecasts for apportioned waste

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

Arisings and forecasts for other waste types

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

Waste capacity assessment for apportioned waste

- an assessment of current and future waste management capacity of waste sites/facilities in each of the partner boroughs as well as in the SLWP area as a whole, including apportionment criteria[14]; existing capacity for permitted and exempt waste sites; the 'capacity gap' between apportionment targets and arisings of other waste types compared to the management capacity; and the likely land requirement to meet any shortfall (for each borough and collectively).

Sites and areas

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

Imports and exports

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

Conclusions and recommendations

- key conclusions and recommendations arising from the study.

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

Waste arisings and forecasts for apportioned waste

3.3 Table 3.1 shows the forecast apportioned waste to be managed over the plan period, consisting of Household and Commercial & Industrial (C&I) waste. While the existing London Plan breaks down the apportionment targets into Household and Commercial & Industrial (C&I) waste, the draft London Plan does not provide this breakdown.

3.4 In order to assess whether there is sufficient waste management infrastructure within the SLWP area, the new apportionment figures in the draft London Plan have been used, rather than estimating actual arisings. The apportionment targets for each borough have then been used to calculate the targets for the intervening years between 2021 and 2041 and the figures for 2016 are taken from the existing London Plan.

3.5 Three out of the four boroughs have been set apportionment targets higher than their anticipated waste arisings, with the exception of Croydon, which has actually been set a lower target. Collectively the apportionment is higher than the anticipated arisings.

Table 3.1: Combined Apportionments for the SLWP area (tonnes per annum)

	2016	2021	2026	2031	2036
Croydon	273,000	252,000	256,000	260,000	264,000
Kingston	143,000	187,000	190,000	193,000	196,000
Merton	161,000	238,000	241,750	245,500	249,250
Sutton	155,000	210,000	213,500	217,000	220,500
SLWP	**732,000**	**887,000**	**901,250**	**915,500**	**929,750**

Arisings and forecasts of other waste types

Construction, Demolition & Excavation Waste Arisings

3.6 Table 3.2 shows both the current and forecasted CD&E waste arisings within the plan area. Figures for 2017 are actuals taken from the Environment Agency's (EA) Waste Data Interrogator (WDI), and future arisings have been forecast using GLA's employment figures in the construction sector until 2036. These figures show an increase in CD&E waste arisings from 508kt in 2017 to 551kt by 2036.

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

Area	Waste Source	Waste Type	2017	2021	2026	2031	2036
Croydon	C&D	Inert/C+D	282,613	292,593	294,629	300,542	304,303
		Hazardous	364	377	380	388	392
	Excavation	Inert/C+D	53,198	55,077	55,460	56,573	57,281
		Hazardous	5,458	5,651	5,690	5,804	5,877
	Total		**341,634**	**353,698**	**356,158**	**363,307**	**367,853**
Kingston	C&D	Inert/C+D	37,530	37,850	38,242	39,002	39,002
		Hazardous	36	37	37	38	38
	Excavation	Inert/C+D	28,037	28,276	28,569	29,137	29,137
		Hazardous	-	-	-	-	-
	Total		**65,604**	**66,162**	**66,848**	**68,176**	**68,176**

Area	Waste Source	Waste Type	2017	2021	2026	2031	2036
Merton	C&D	Inert/C+D	46,243	47,956	50,051	52,081	54,016
		Hazardous	19	19	20	21	22
	Excavation	Inert/C+D	27,047	28,048	29,274	30,461	31,593
		Hazardous	201	208	218	226	235
	Total		**73,510**	**76,232**	**79,563**	**82,789**	**85,865**
Sutton	C&D	Inert/C+D	15,478	15,638	15,834	16,214	16,576
		Hazardous	29	29	30	30	31
	Excavation	Inert/C+D	11,071	11,185	11,326	11,597	11,856
		Hazardous	576	582	589	603	617
	Total		**27,154**	**27,434**	**27,778**	**28,445**	**29,080**
SLWP	C&D	Inert/C+D	381,865	394,036	398,756	407,838	413,897
		Hazardous	448	463	467	477	483
	Excavation	Inert/C+D	119,353	122,586	124,628	127,768	129,867
		Hazardous	6,235	6,441	6,497	6,634	6,729
	Total		**507,901**	**523,526**	**530,348**	**542,717**	**550,975**

Low Level Radioactive Waste

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

Agricultural Waste

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

Hazardous Waste

3.9 Table 3.3 shows that hazardous waste arisings within the plan area are predicted to increase from 20.2 ktpa in 2017 to around 21.6 ktpa by 2036 based on the EA's Hazardous Waste Data Interrogator (WD). Future hazardous waste arisings have been forecast using anticipated growth rates in the GLA's draft London Plan and forecast C&I waste arisings. However, these tonnages are already included in the household and C&I waste apportionment and in forecasted CD&E waste arisings.

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

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

Wastewater

3.10 Thames Water is responsible for wastewater and sewage sludge treatment in London and manages sewerage infrastructure as well as sewage treatment works. Wastewater quantities are expected to increase from 52.9 million m^3/yr to 55.7 million m^3/yr.

3.11 The four boroughs are served across Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works (STW). Thames Water have confirmed that these facilities all have adequate capacity to manage the incoming sewage and have all had major capacity increases since 2010[15].

Waste exports and imports

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

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

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

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

Existing waste management sites and areas

3.15 As part of the evidence base for the new plan, a comprehensive analysis has been undertaken for all operational waste management sites in south London. Detailed site profiles are set out in Appendix 4 of the Technical Paper, including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility and planning constraints.

3.16 Table 3.4 provides a breakdown of existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment for household and C&I waste. Where relevant, opportunities to increase capacity have also been identified in order to meet the capacity gaps identified above in Tables 3.4 to 3.6. These opportunities include intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses.

3.17 In addition, waste facilities in the planning pipeline were identified which, if given planning permission, would also contribute towards the shortfall in waste management capacity.

Table 3.4 Sites Counting Towards the Apportionment and C&D Target

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
Croydon				
C1	Able Waste Services	0	43,268	
C2	Croydon Car Spares	241	0	
C3	Curley Skip Hire	0	0	
C4	Days Aggregates Purley Depot	0	0	
C5	Factory Lane Waste Transfer Station	9,623	5,206	Yes
C6	Fishers Farm Reuse & Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Materials	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Civic Amenity Site	6,684	0	
C11	Safety Kleen	0	0	Yes
C12	Stubbs Mead Depot	0	0	Yes
CEX	Exempt Sites	7,580	0	
	Croydon Total	**32,883**	**48,474**	
Kingston				
K1	Chessington Equestrian Centre	0	0	
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Civic Amenity Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
	Kingston Total	**35,642**	**0**	

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
Merton Capacity				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M4	Garth Road Civic Amenity Site	9,866	0	
M5	Garth Road Transfer Station	15,704	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management (Willow Lane)	0	33,845	
M9	Maguire Skips (Wandle Way)	0	0	
M10	Maguire Skips (Weir Court)	0	42,856	
M11	Morden Transfer Station	0	0	
M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	Yes
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites[16]	6,000	0	Yes
	Merton Total	**213,179**	**150,183**	
Sutton Capacity				
S1	777 Recycling Centre	20,625	32,972	Yes
S2	Beddington Farmlands ERF	275,000	0	
S3	Cannon Hygiene	0	0	Yes
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Civic Amenity Site	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Country Waste Skip Hire	305,000	0	
SEX	Exempt Sites	500	0	
	Sutton Total	**664,641**	**43,025**	

[16] including M3: Deadman Confidential

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
South London Capacity				
	Croydon	32,883	48,474	
	Kingston	35,642	0	
	Merton	213,179	150,183	
	Sutton	664,641	43,025	
	South London Total	946,345	241,682	
South London Capacity Gap				
	South London Capacity	946,345	241,682	
	South London Target/Forecast	929,750	414,380	
	Capacity Gap	+16,595	-172,698	

Source: Anthesis Consultants 2019

Waste capacity assessment

Apportionment criteria

3.18 Current and future waste management capacity in the SLWP area has been established using a number of data sources, including EA 'active sites', WDI and environmental permitting data. In line with the draft London Plan, waste is deemed to be 'managed' where:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra definition as a minimum[17].

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

3.20 Exempt sites, which do not require an environmental permit, have been included where capacity meets the requirements of the London Plan. Details of exempt sites and assumed capacities for each site are set out in Section 5.2.3 of the Technical Paper.

Waste capacity gaps for apportionment waste

3.21 Table 3.5 sets out the aggregated capacity for all four boroughs for the baseline year of 2017 and over the plan period from 2021 to 2036 which counts towards meeting the draft London Plan apportionment. It shows that total capacity is due to decrease, as the Viridor Recycling & Composting Centre within LB Sutton only has temporary planning permission until 2023. Overall the capacity gap is projected to increase from 117 ktpa in

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

2021 to 182 ktpa by 2036, due to the loss of this site and the increasing apportionment target. Table 3.5 differs from Table 3.4 as it does not include planning permissions.

Table 3.5 Management capacity for household and C&I (apportionment) waste, apportionment targets and capacity gap for the SLWP area from 2021-36 (tonnes per annum)

	2021	2026	2031	2036
Transfer	281,299	259,225	259,225	259,225
Recycling & Reuse	96,809	96,809	96,809	96,809
Composting, AD and Land spread	98,056	98,056	98,056	98,056
Energy from waste	275,000	275,000	275,000	275,000
Exemptions	19,080	19,080	19,080	19,080
Total capacity	770,244	748,170	748,170	748,170
Apportionment	887,000	901,250	915,500	929,750
Capacity gap	**116,756**	**153,080**	**167,330**	**181,580**
Land requirement[18]	**1.95 ha**	**2.55 ha**	**2.79 ha**	**3.03 ha**

Waste capacity gaps for construction & demolition (C&D) waste for the SLWP area

3.22 Table 3.6 shows that the aggregated capacity gap for C&D waste is predicted to increases from 148 ktpa in 2021 to 168 ktpa into 2036, due to anticipated increased C&D waste generation. Table 3.6 differs from Table 3.4 as it does not include planning permissions.

Table 3.6: Management capacity for construction and demolition (C&D) waste, arisings and capacity gap for the SLWP area from 2021 to 2036 (tonnes per annum)

	2021	2026	2031	2036
Transfer	213,146	213,146	213,146	213,146
Recycling and Reuse	32,972	32,972	32,972	32,972
Total capacity	246,118	246,118	246,118	246,118
C&D waste arisings	394,499	399,223	408,315	414,380
Capacity gap	**148,381**	**153,105**	**162,197**	**168,262**
Land requirement	**2.47 ha**	**2.55 ha**	**2.70 ha**	**2.80 ha**

Overall waste capacity gaps for the SLWP area

3.23 Table 3.7 shows that overall waste management capacity within the SLWP areas is forecast to increase from 265 ktpa to 350 ktpa by 2036, meaning that the estimated land requirement for additional sites across the four boroughs will increase from 4.4 to 5.8 ha.

[18] The land requirement to meet the capacity gap uses a conversion figure of 60,000 tonnes per hectare. This figure is based upon a number of data sources and conversion factors used for other adopted waste plans. The rationale behind this figure is explained in this Appendix 3 of the Technical Paper

Table 3.7: Overall capacity gap for the SLWP area from 2021 to 2036 (tonnes per annum)

	2021	2026	2031	2036
Target	1,281,499	1,300,473	1,323,815	1,344,130
Capacity	1,016,362	994,288	994,288	994,288
Capacity gap	**265,137**	**306,185**	**329,527**	**349,842**
Land requirement	**4.42 ha**	**5.10 ha**	**5.49 ha**	**5.83 ha**

Comparison of the capacity gaps and potential new capacity

3.24 Table 3.8 compares the capacity gaps with the potential new capacity identified, and calculates the 'balance of capacity' over the plan period from 2021 to 2036.

Table 3.8: Summary of waste capacity gaps in the SLWP area from 2021 to 2036 (tonnes and hectares)

		2021	2026	2031	2036
Household and C&I (apportionment) waste	Capacity gap	116,756	153,080	167,330	181,580
	Potential new capacity	270,000	270,000	270,000	270,000
	Balance	+153,244	+116,920	+102,670	+88,420
C&D waste	Capacity gap	148,381	153,105	162,197	168,262
	Potential new capacity	218,000*	218,000*	218,000*	218,000*
	Balance	+69,619	+64,895	+55,803	+49,738

3.25 Based on the above calculations, the Technical Paper concludes that the waste sites identified by the consultants as suitable for intensification and development represent sufficient opportunity to meet the capacity gaps for household, C&I and C&D waste streams. Table 3.7 shows that if all potential new capacity identified were to be brought forward, there would be surplus capacity for the management of household, C&I and C&D waste streams throughout the plan period from 2021 to 2036. Although this surplus is forecast to decrease over the plan period, there is considered to be some flexibility in bringing this capacity forward. Furthermore, the boroughs dispute that all of this new capacity is deliverable and therefore Table 3.4 is a more reliable guide to future capacity.

3.26 As sufficient opportunities can be identified to meet South London's capacity gap for household, C&I (apportioned waste) and C&D waste streams, the Technical Paper concluded that it will not be necessary for the updated SLWP to identify any new areas for new waste facilities within the four boroughs.

4 SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT

Government Guidance and best practice

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

Main Stages of Appraisal

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

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

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

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

4.4 The SA Scoping Report (i.e. this document) presents the outcome of Stage A in relation to the appraisal of the emerging SLWP.

Stage B: Developing and Refining Options and Assessing Effects

4.5 Stage B, which is to be undertaken as part of the preparation of 'issues and options' and subsequently in the preparation of 'preferred options', involves:

- **Task B1:** Testing plan objectives against the SA Framework to ensure compatibility;
- **Task B2:** Developing plan options, working with the community and stakeholders, in order to achieve the objectives and contribute to sustainable development;

- **Task B3:** Predicting the social, economic and environmental effects of the plan options against the SA Framework and comparing with the 'no plan' and 'business as usual' scenarios;
- **Task B4:** Evaluating the effects of the plan in terms of their significance and the overall sustainability of each option, including the 'preferred option';
- **Task B5:** Considering ways of mitigating adverse effects and maximising beneficial effects; and
- **Task B6:** Proposing measures to monitor the significant effects of plan implementation.

Stage C: Preparing the Sustainability Appraisal Report

4.6 The SA Report, which must be prepared alongside the 'preferred options' document for statutory public consultation, is the key output of the appraisal process.

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

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

4.8 In line with Task C1, it is therefore intended to prepare a series of SA reports for public consultation (i) at the SLWP 'issues and options' stage (ii) at the 'proposed submission' stage; and (iii) on the submission draft incorporating minor changes.

Stage D: Consulting on Preferred Options

4.9 Stage D involves the following Tasks:

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

Stage E: Monitoring the significant effects of implementing the plan

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

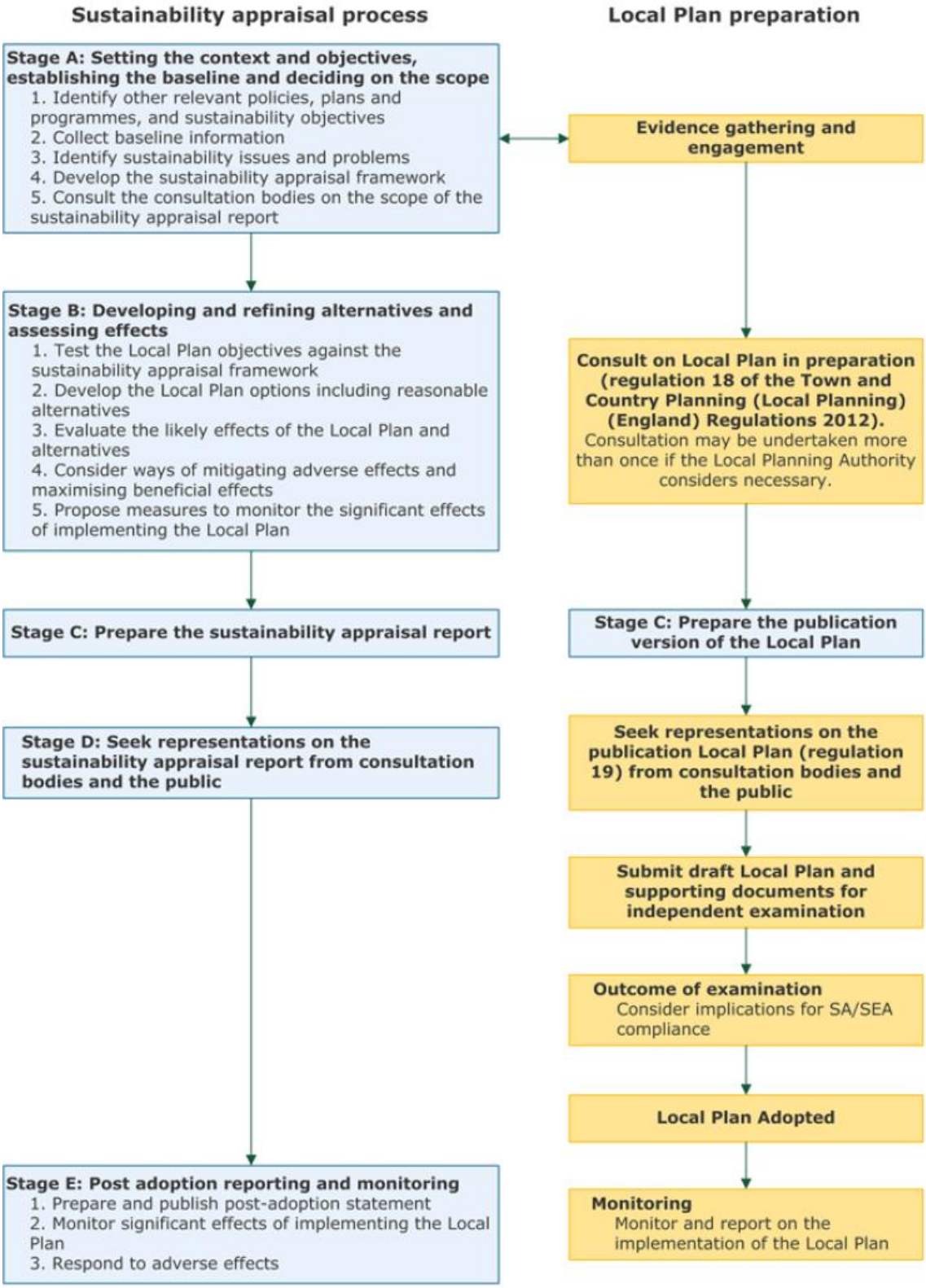
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

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

Key Outputs of Appraisal

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

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



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

Table 4.1: Key Outputs of the SA process

Stage of Plan Preparation	Key Appraisal Outputs (publication of SA Reports)	Timescale
Evidence Gathering	• **SA Scoping Report** *SA Stages A1-A5*	Consultation with relevant bodies 16 Sept – 22 Oct 2019
Consultation on Issues and Options	• **SA Report on Issues & Options** • Equalities Impact Assessment (EqIA) report • Habitats Regulations Assessment (HRA) screening *SA Stages A1-A5*	31 October - 22 December 2019
Consultation on draft SLWP Proposed Submission	• **SA Report on Proposed Submission** • EqIA • HRA (if required) *SA Stages C1 and D1*	May 2020
Submission of draft SLWP incorporating minor changes to the Secretary of State	• **SA Report on Submission Draft incorporating minor changes** • EqIA • HRA (if required) *SA Stage D2(i)*	August 2020
Examination-in-Public	n/a	January 2021
Inspector's Report	n/a	March 2021
Adoption of SLWP incorporating modifications	• **SA Report on modifications** arising from Inspector's Report *SA Stage D2(ii)*	July 2021
Post-adoption	• **ongoing monitoring of SLWP** (via AMRs) *SA Stages E1 and E2*	From July 2021

Equalities Impact Assessment

4.14 An Equalities Impact Assessment (EqIA) is defined by the Equality and Human Rights Commission[17] as *"a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody"*. EqIAs help local planning authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should therefore inform policy preparation from the earliest stages of plan making.

4.15 EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although

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

the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to "give due regard" to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying with this duty.

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

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

Habitats Regulations Assessment (HRA)

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

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

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

5 OTHER RELEVANT PLANS, PROGRAMMES AND SUSTAINABILITY OBJECTIVES (TASK A1)

Policy review

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

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

International context

EU Waste Framework Directive 2008

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

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

EU Waste Framework Directive 2008

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

Waste Electrical and Electronic Equipment Directive

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

EU Review of Waste Policy and Legislation

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

'Brexit'

5.7 The Government's Brexit White Paper (2017) confirms that the current framework of environmental regulation set out in EU Directives will be transposed into UK law. This provides some degree of certainty in terms of policy direction for the immediate future.

UNESCO World Heritage Convention

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

European Convention on the Protection of Archaeological Heritage

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

National context

Localism Act 2011 and the Duty to Co-operate

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

HM Government 25 Year Environment Plan

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

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

UK Resources and Waste Strategy (December 2018

5.12 The Government's 'Resources and Waste Strategy for England'[21] was introduced in December 2018, building on the earlier publication of 'A Green Future: Our 25 Year Plan to Improve the Environment'[22] in January 2018. In seeking to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy, the strategy:

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

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

Waste Management Plan for England

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

National Planning Policy Framework

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

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

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

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

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

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

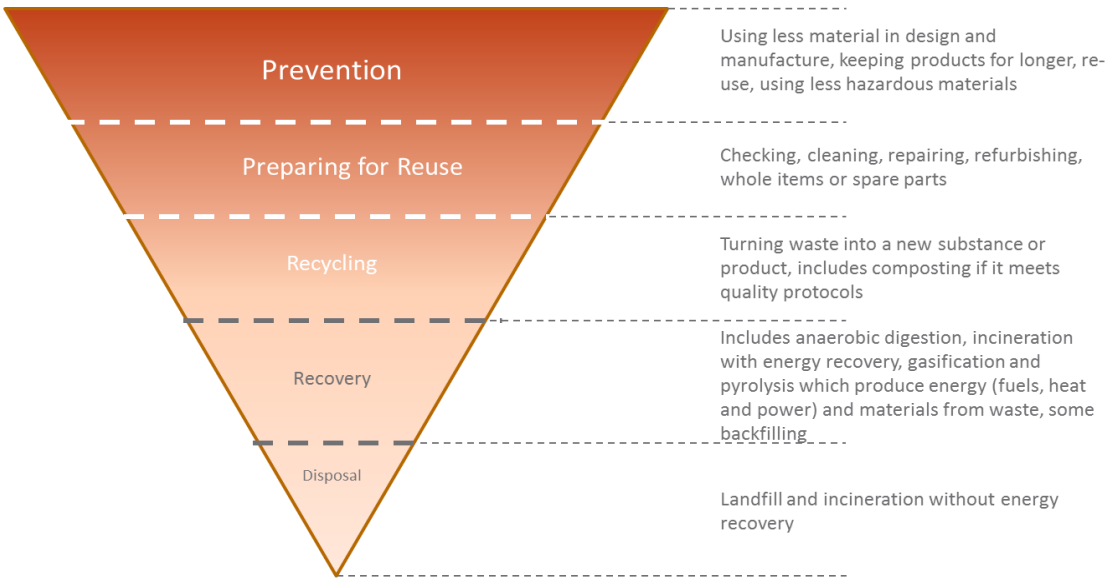
5.16 The revised NPPF sets out the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate (DtC). When assessing if the SLWP is sound, the Inspector will look to statements of common ground between the four boroughs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

National Planning Policy for Waste (NPPW)

5.17 The National Planning Policy for Waste[23] (DCLG, 2015) sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW requires waste planning authorities to:

- prepare Local Plans or local waste plans which drive waste management up the waste hierarchy (see Figure 5.1);
- have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management;
- allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan (suitable areas can be identified as well as sites for new or enhanced waste management facilities);
- provide additional capacity through facilitating the maximum use of existing facilities;
- direct new waste facilities towards industrial locations;
- identify broad types of waste management facility that would be appropriately located on allocated sites or in suitable areas in line with the waste hierarchy; and
- seek opportunities to co-locate waste management facilities together with complementary activities.

Figure 5.1: The Waste Hierarchy



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

5.18 Local waste plans must be underpinned by a proportionate evidence base which establishes the need for waste management facilities and identifies suitable sites and areas to meet this need. The evidence base should include details of:

- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings.

5.19 Information on existing waste management facilities should include:

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

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

Planning (Listed Buildings and Conservation Areas) Act 1990

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

Ancient monuments and Archaeological Areas Act 1979

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

London context

London Environment Strategy

5.23 The Mayor's London Environment Strategy (May 2018) updates targets for waste and recycling. These updated targets will be taken forward in a new London Plan, due for publication in 2020. The Mayor's strategy for waste includes the following targets:

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

London Plan 2016

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

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

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

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

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

Draft New London Plan 2017

5.27 The draft new London Plan (GLA, December 2017) incorporating minor suggested changes and further suggested changes, sets out the following revised targets which reflect those set out in the London Environment Strategy:

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

5.28 New apportionment targets are introduced for each borough in order to meet the net self-sufficiency target for LACW and C&I waste. Table 5.2 shows that the combined apportionment targets for South London from 2021 to 2036 are higher than those set by the current London Plan.

Table 5.2: Draft new London Plan 2017 apportionment targets for South London (tpa)

	Apportionment 2021	Apportionment 2036
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
SLWP	**887,000**	**944,000**

5.29 The draft new London Plan waste policies have been updated to align with the NPPW approach to identifying sites and/or areas to meet identified waste management need.

5.30 The definition of managed waste has been extended to include the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum. This increases the amount of existing capacity which counts towards managing apportioned waste.

5.31 The further suggested changes to the London Plan make clear that boroughs are expected to identify suitable additional capacity for those waste streams not apportioned by the London Plan, where practicable.

London Infrastructure Plan (update 2015)[24]

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

5.33 The GLA and the London Water and Recycling Board (LWARB) have now developed a Route Map for London's transition to a circular economy[25]. This identifies the need for London's waste authorities, with assistance from the LWARB, to introduce more consistent collection and recycling services that will help to increase the capture of materials from individuals and businesses. Improved waste collection is needed, both under the current system and to support the circular economy. Circular economy principles can also be promoted by designing waste out of manufactured products, so that they can be disassembled and reused with the minimum of effort and energy.

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

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

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

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

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

The Mayor's Sustainable Design and Construction SPG

5.36 The Mayor's supplementary planning guidance (SPG) on 'Sustainable Design and Construction'(GLA, 2014)[26] sets out best practice guidance on circular economy principles aimed at reducing waste, increasing recovery from demolition materials, maximising pre-fabricated elements and providing sufficient space for storing recyclables and residual waste ready for collection.

5.37 This document is likely to be superseded upon adoption of the new London Plan and the Mayor's Circular Economy Statement guidance.

The Mayor's Municipal Waste Management Strategy 2011

5.38 The Mayor's Municipal Waste Management Strategy[27] (GLA, 2011) was produced by the previous Mayor and has been replaced by the London Environment Strategy 2017.

The Greater London Historic Environment Record

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

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

Local context

South London Waste Plan 2012

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

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

South London Waste Partnership Joint Municipal Waste Strategy (2011)

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

London Borough of Croydon

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

Royal Borough of Kingston-upon-Thames

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

London Borough of Merton

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

5.46 Merton's emerging (Stage 2) Local Plan (October 2018) includes an updated strategic policy which identifies the SLWP as the key delivery vehicle for waste planning.

Strategic Objective 4 aim to apply the waste hierarchy and exploit opportunities to utilise energy from waste. Policies CC8.10 and CC8.15 both include a commitment to support the principles of the circular economy.

London Borough of Sutton

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

5.48 Sutton Industrial Land Phase 1 Baseline Study (Boyer, May 2016) assesses the three strategic industrial areas (SILs) of Beddington, Kimpton and Imperial as suitable for waste uses. While Beddington SIL and Kimpton SIL are identified in Schedule 2 of the SLWP, Imperial Way (6ha) is not included.

5.49 Although the Wandle Valley Trading Estate is identified as suitable for waste uses in Schedule 2 of the SLWP, this site now forms part of a site allocation in Sutton's Local Plan and has planning permission for residential development which is currently under construction. The permission also includes a re-provision of 1,152 m^2 of industrial floor space on the remainder of the site

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

6 BASELINE (TASK A2)

What is baseline information?

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

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

- Authority Monitoring Reports (AMRs) for 2017-18 prepared by the respective boroughs;
- numerous studies undertaken by the four boroughs or by consultants as part of the evidence base for the Local Plan including employment land reviews, open space studies, infrastructure studies and Strategic Flood Risk Assessment (SFRA);
- studies undertaken by the GLA or by consultants as part of the evidence base for the new London Plan, including the London Industrial Land Demand Study (CAG, 2017);
- the London Employment Sites database;
- development monitoring data via the London Development Database;
- socio-economic and environmental information from the GLA London Datastore, including borough population and household projections; and
- mid-year estimates and population data from the Office for National Statistics.

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

The Plan Area

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

6.5 According to the latest mid-year estimates published by the Office of National Statistics (ONS) in 2019, the combined population of the four SLWP boroughs reached a total of 971,527 in mid 2018, representing an increase of 58,250 (+6.4%) since the 2011 Census. According to the GLA's housing-led projections, this population is expected to increase by 115,814 or +11.4% from a total of 1,016,201 in 2021 to 1,132,015.

6.6 In terms of the future spatial development of the four partner boroughs, the draft new London Plan identifies Opportunity Areas centred upon each of the three Metropolitan Centres of Croydon, Sutton and Kingston together with a further Opportunity Area at

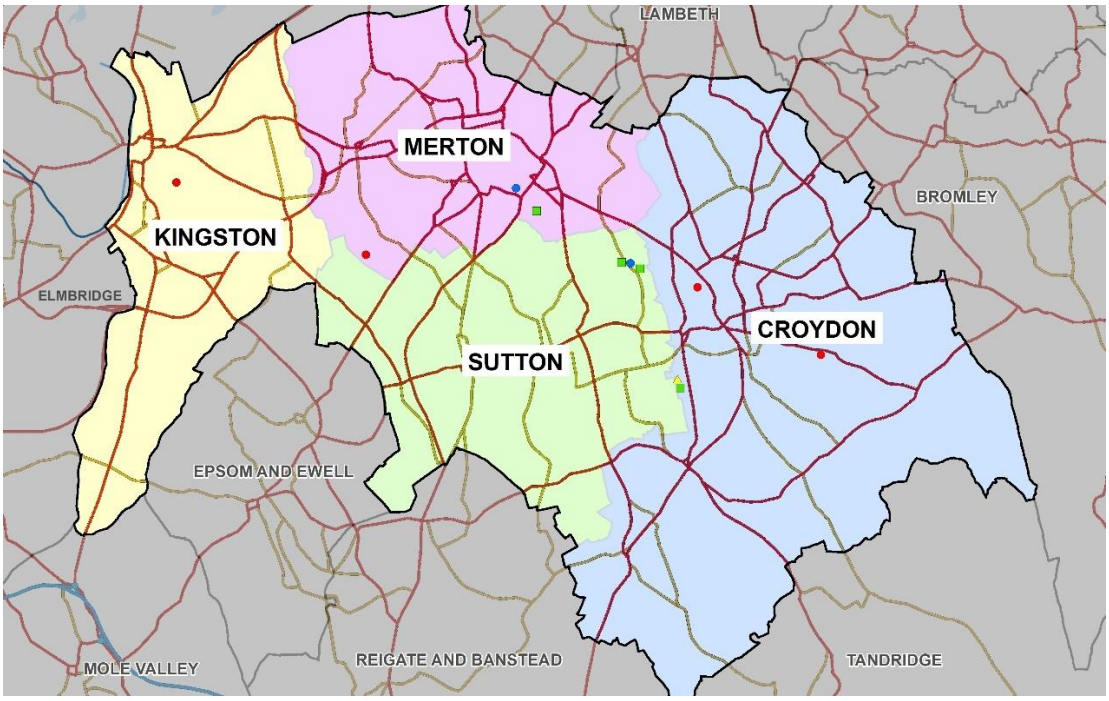
Wimbledon/ Colliers Wood/ South Wimbledon. Each of these areas of change is expected to be a focus for significant growth and economic regeneration over the lifetime of the plan to 2041. However the ability of these Opportunity Area areas to accommodate the additional housing and jobs needed over the coming decades will require major investment in strategic transport infrastructure, namely Crossrail 2 and the Tramlink extension.

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

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

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

Figure 6.1: The South London Waste Plan Area.



London Borough of Croydon

6.10 The London Borough of Croydon has an area of 8,650 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Croydon reached a total of 385,346 in mid 2018.

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

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

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

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

Royal Borough of Kingston-upon-Thames

6.15 The Royal Borough of Kingston-upon-Thames has an area of 3,726 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Kingston reached a total of 175,470 in mid 2018. Kingston's predominant character is of leafy suburbs with relatively low density development of two or three-storey houses with gardens, though there are some higher density neighbourhoods, mainly around Kingston and Surbiton town centres and along major roads.

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

London Borough of Merton

6.17 Merton is the one of the smallest boroughs in London with an area of 3,762 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Merton reached a total of 206,186 in mid 2018.

6.18 Crossrail 2 and associated investment are expected to have a significant impact on the future regeneration and growth of Merton. This will help support the delivery of housing, mixed-use and commercial development across the borough and the opportunity areas located within it. The step change in transport capacity and connectivity offered by Crossrail 2 is expected to transform Wimbledon into a major transport hub with opportunities for interchange with National Rail, trams and the Underground. The redevelopment required to deliver the Crossrail 2 tunnel offers the opportunity to plan for significant growth and intensification, with residential and commercial development. Crossrail 2 will strengthen Wimbledon's role as a 'major town centre', and as a location with potential for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres.

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

London Borough of Sutton

6.20 The London Borough of Sutton (4,485 ha) forms an important part of the Wandle Valley, one of three growth corridors identified as having 'city region importance' in the current London Plan 2016. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Sutton reached a total of 204,525 in mid 2018.

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

6.22 Sutton Town Centre is one of four Metropolitan Centres in South London and an Opportunity Area in the draft new London Plan. The town centre has over 190 retail units within an attractive pedestrianised environment. Sutton Town Centre is complemented by seven district centres, at Cheam, North Cheam, Wallington, Worcester Park, Hackbridge, Rosehill and Carshalton, along with many local centres and dispersed parades.

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

POPULATION

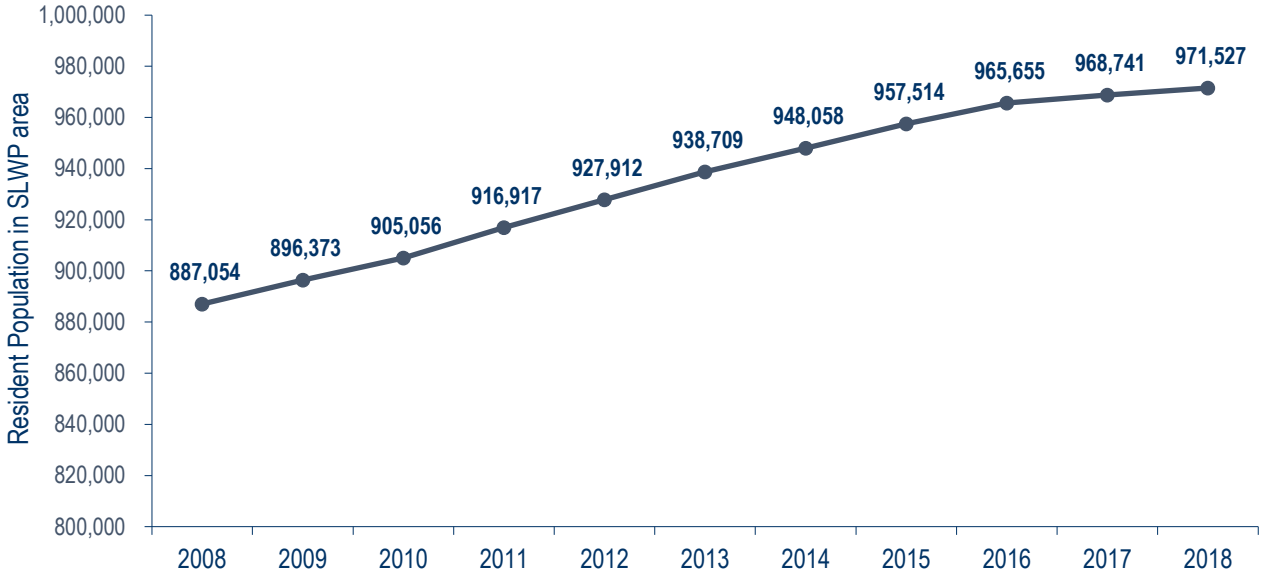
Resident population

Table 6.1: Resident Population for SLWP boroughs and plan area

	Population 2011 Census	Population mid-2018	Change since 2011
Croydon	363,378	385,346	**+ 21,968 (6.0%)**
Kingston	160,060	175,470	**+ 15,410 (9.6%)**
Merton	199,693	206,186	**+ 6,493 (3.3%)**
Sutton	190,146	204,525	**+ 14,379 (+ 7.6%)**
SLWP	**913,277**	**971,527**	**+ 58,250 (+6.4%)**

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

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



Components of population change 2017 to 2018

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

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

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

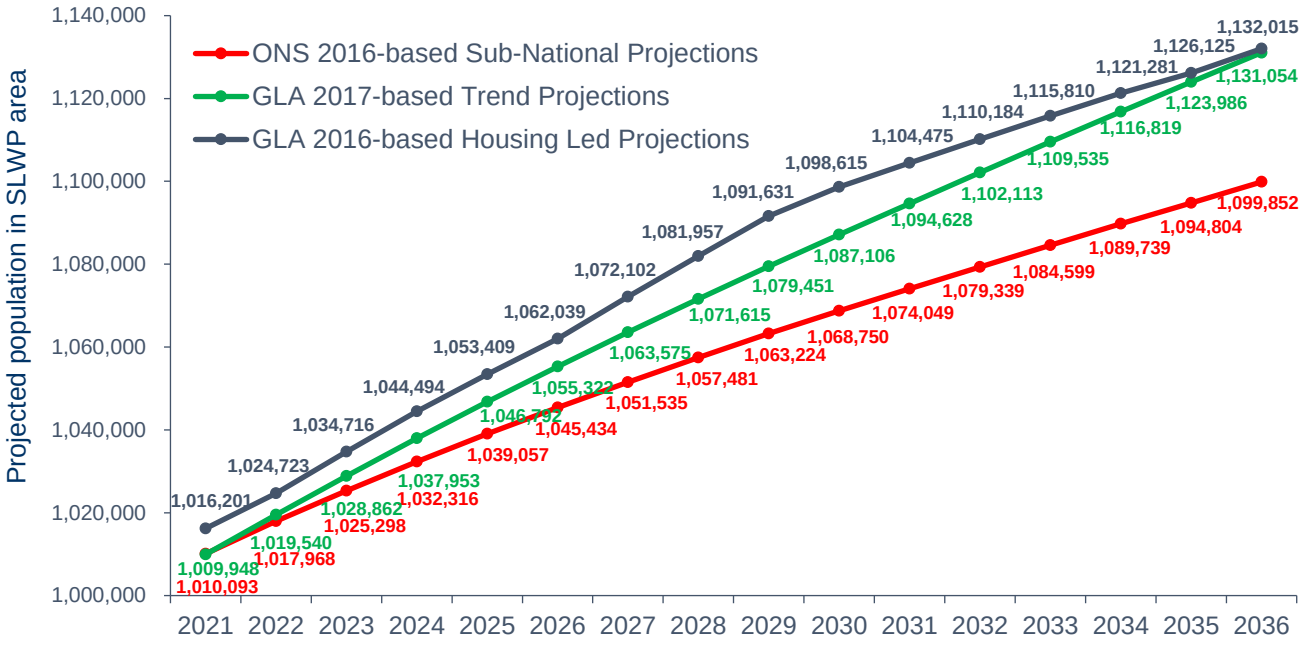
Population projections

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

	Population Projections								
	GLA 2016-based Housing Led[28]			GLA 2017-based Central Trend[29]			ONS 2016-based Subnational Projections		
	2021	2036	Change	2021	2036	Change	2021	2036	Change
Croydon	403,461	454,085	+50,624 (+12.5%)	399,528	446,831	+47,303 (+11.8%)	400,227	436,252	+36,024 (+9.0%)
Kingston	184,660	209,179	+24,519 (+13.3%)	182,794	205,858	+23,064 (+12.6%)	185,017	205,061	+20,045 (+10.8%)
Merton	214,740	238,242	+23,502 (+10.9%)	215,020	238,151	+23,131 (+10.8%)	212,915	225,972	+13,057 (+6.1%)
Sutton	213,340	230,509	+17,169 (+8.0%)	212,607	240,215	+27,608 (+13.0%)	211,933	232,566	+20,633 (+9.7%)
SLWP	**1,016,201**	**1,132,015**	**+115,814** (+11.4%)	**1,009,948**	**1,131,054**	**+121,106** (+12.0%)	1,010,093	1,099,852	**+89,759** (+8.9%)

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

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



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

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

[29] GLA 2016-based central trend population projections are available on the London Datastore at https://data.london.gov.uk/dataset/projections

Population structure

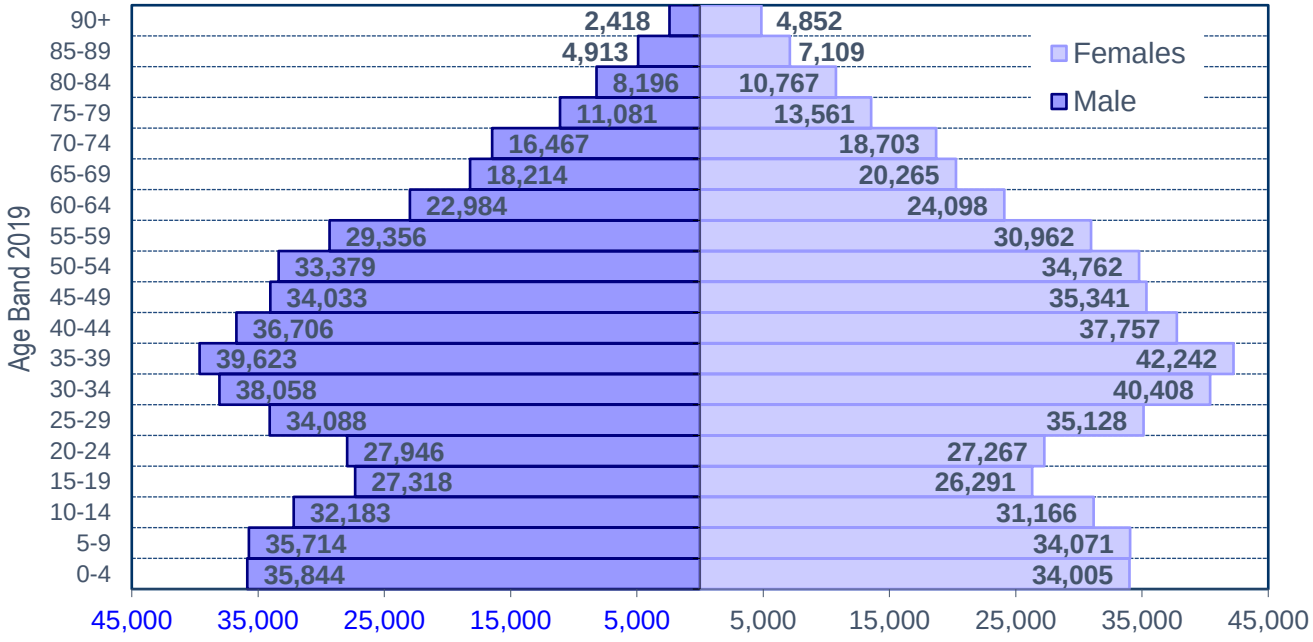
Table 6.4: Population structure for SLWP boroughs and plan area 2019

	Resident Population 2019			
	Age band	Males	Females	All persons
Croydon	Borough residents aged 0-15	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 6.4: Population structure by gender and age band for the plan area 2019



Projected Change in Population Structure

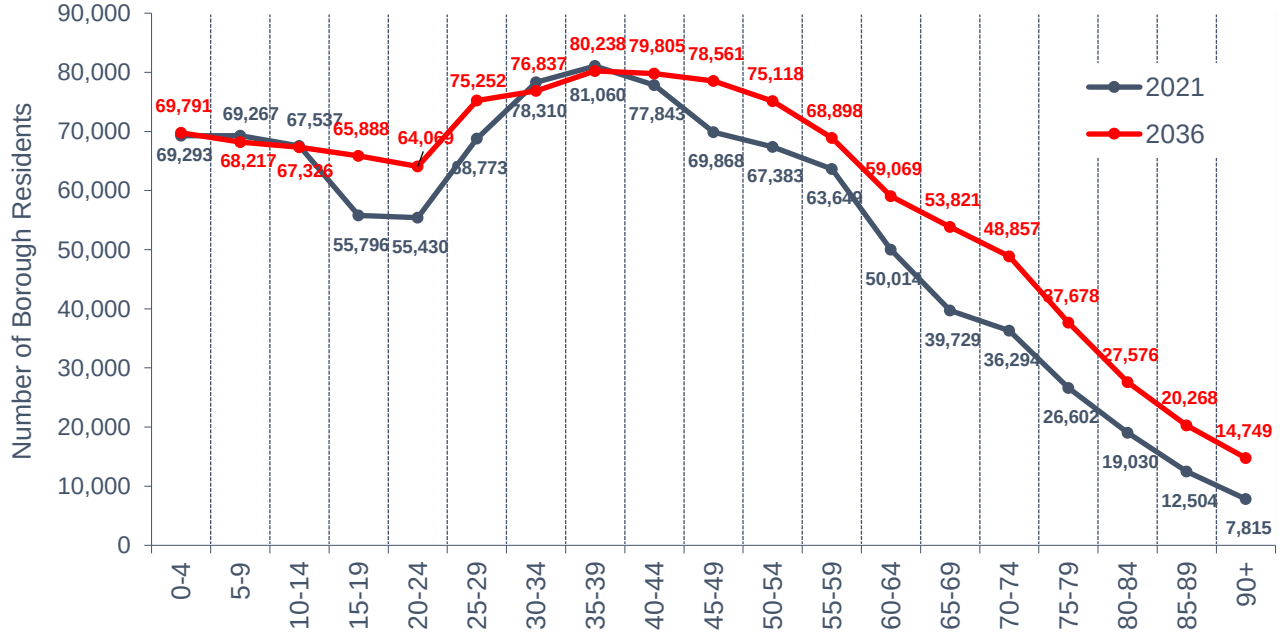
Table 6.5: Change in population structure for SLWP boroughs and plan area 2021-36

	Resident Population			
	Age band	All persons 2021	All persons 2036	Projected change
Croydon	Borough residents aged 0-15	90,435	92,332	**+1,897** (+2.1%)
	Borough residents aged 16-64	256,627	277,727	**+21,100** (+8.2%)
	Borough residents aged 64+	56,399	84,027	**+27,628** (+49%)
	Total	**403,461**	**454,086**	**+50,625** (+12.5%)
	Age band	All persons 2021	All persons 2036	Projected change
Kingston	Borough residents aged 0-15	36,920	37,348	**+428** (+1.2%)
	Borough residents aged 16-64	122,032	135,373	**+13,341** (+10.9%)
	Borough residents aged 64+	25,709	36,458	**+10,749** (+41.8%)
	Total	**184,661**	**209,179**	**+24,518** (+13.3%)
	Age band	All persons 2021	All persons 2036	Projected change
Merton	Borough residents aged 0-15	45,079	45,587	**+508** (+1.1%)
	Borough residents aged 16-64	142,531	155,163	**+12,632** (+8.9%)
	Borough residents aged 64+	27,129	37,495	**+10,366** (+38.2%)
	Total	**214,739**	**238,245**	**+23,506** (+10.9%)
	Age band	All persons 2021	All persons 2036	Projected change
Sutton	Borough residents aged 0-15	45,760	43,588	**-2,172** (-4.7%)
	Borough residents aged 16-64	134,839	141,951	**+7,112** (+5.3%)
	Borough residents aged 64+	32,737	44,969	**+12,232** (+37.4%)
	Total	**213,336**	**230,508**	**+17,172** (+8.0%)

	Age band	All persons 2021	All persons 2036	Projected change
SLWP area	Residents aged 0-15	218,194	218,855	**+661** (+0.3%)
	Residents aged 16-64	656,029	710,214	**+54,185** (+8.3%)
	Residents aged 64+	141,974	202,949	**+60,975** (+42.9%)
	Total	1,016,197	1,132,018	**+115,821** (+11.4%)

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

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



Population density

Table 6.6: Population density

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

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

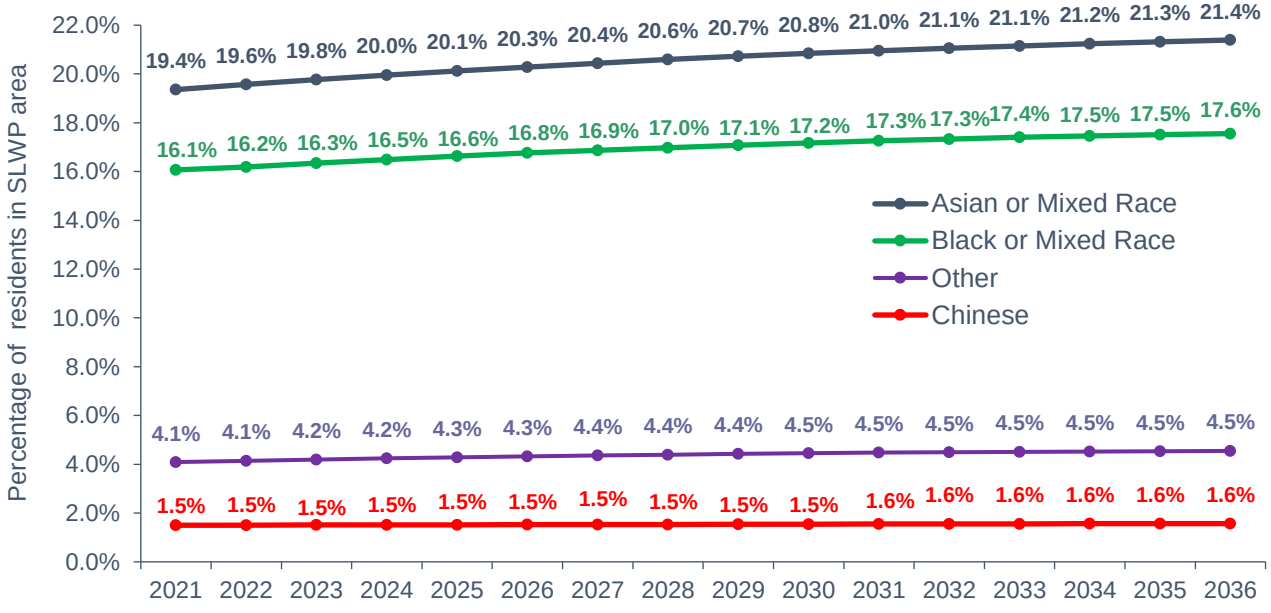
Ethnicity

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

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

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

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



Religion

Table 6.8: Religion for SLWP boroughs and plan area 2019

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

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

Household growth

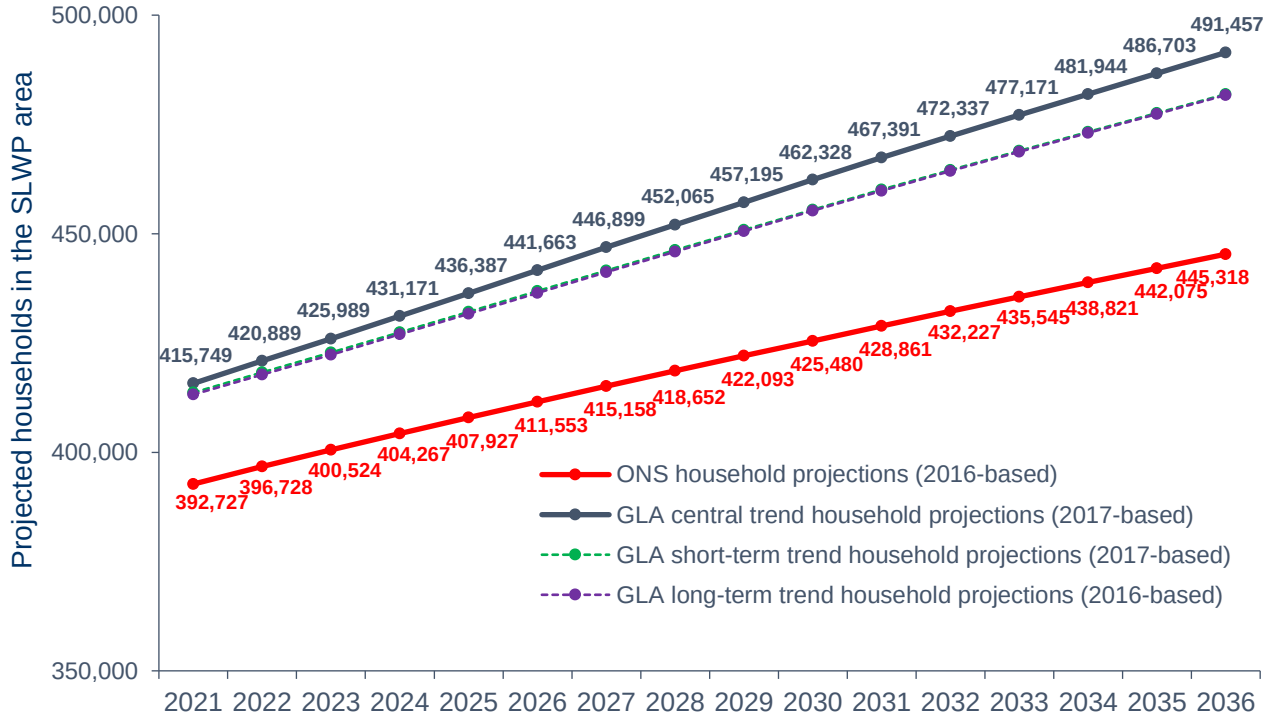
Table 6.9: Household growth within SLWP boroughs and plan area from 2011 to 2019

	Number of households		
	2011	2019	Change since 2011
Croydon	145,640	162,205	+16,565 (+11.4%)
Kingston	63,755	71,250	+7,495 (+11.8%)
Merton	79,056	85,249	+6,193 (+7.8%)
Sutton	78,576	86,595	+8,019 (+10.2%)
SLWP	**367,027**	**405,299**	**+38,272 (+10.4%)**

Sources: GLA Central Trend Projection 2017-based[30]

Household projections 2021-36

Figure 6.7: Household projections for plan area 2021-36



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

Housing tenure by household

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

	Number of households				
	Own Outright	Mortgage	Rented from Council or Reg. Provider	Rented from private landlord	Total
Croydon	39,300 (26.5%)	58,200 (39.2%)	22,400 (15.1%)	28,300 (19.1%)	148,300
Kingston	20,300 (31.1%)	19,700 (30.2%)	8,200 (12.6%)	17,100 (26.2%)	65,300
Merton	25,300 (31.5%)	24,900 (31.0%)	10,700 (13.3%)	19,400 (24.2%)	80,300
Sutton	23,900 (30.6%)	30,500 (39.1%)	8,900 (11.4%)	14,800 (19.0%)	78,100
SLWP	**108,800** (29.2%)	**133,300** (35.8%)	**50,200** (13.5%)	**79,600** (21.4%)	**372,000**

Sources: ONS Annual Population Survey 2017

Car ownership

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

	Cars	Households	Cars per household	London ranking (out of 33 boroughs)
Croydon	141,252	162,205	0.87	13th
Kingston	65,848	71,250	0.92	7th
Merton	71,904	85,249	0.84	15th
Sutton	87,428	86,595	1.01	6th
SLWP	366,432	405,299	0.90	n/a
LONDON	2,661,162	3,717,084	0.72	n/a

Source: DVLA/DfT: Number of Licensed Vehicles June 2019

Social deprivation

Table 6.12: Index of Multiple Deprivation (IMD 2015) - national ranking

	Social deprivation ranking compared to the 326 areas in England[31]		
	IMD 2010	IMD 2015	Change 2010-15
Croydon	107th	**96th** most deprived in England	↑
Kingston	255th	**278th** most deprived in England	↓
Merton	208th	**213th** most deprived in England	↓
Sutton	196th	**215th** most deprived in England	↓

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

Table 6.13: 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	20th	**17th** most deprived in London	↑
Kingston	28th	**28th** most deprived in London	No change
Merton	29th	**29th** most deprived in London	No change
Sutton	31st	**32th** most deprived in London	↓

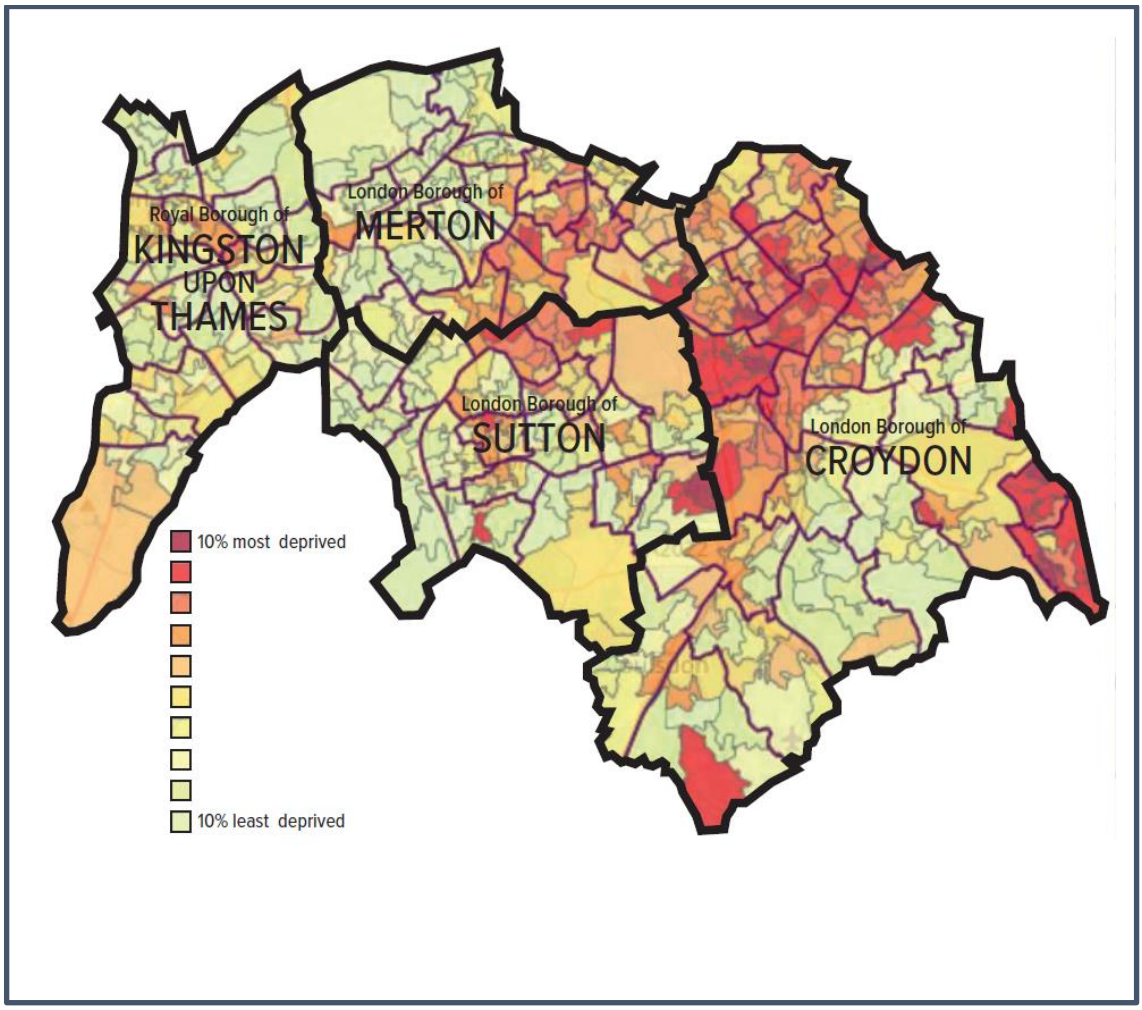
[31] based on IMD 2015 'rank of average score' (1st = most deprived and 326th = least deprived)

Table 6.14: 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

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



Fuel Poverty

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

	Households	Fuel Poor Households	Proportion of households who are fuel poor (%)
Croydon	149,787	17,197	11.5%
Kingston	65,753	7,192	10.9%
Merton	81,471	9,012	11.1%
Sutton	80,770	7,319	9.1%
SLWP	**377,781**	**40,720**	**10.8%**
LONDON	3,371,821	397,924	11.8%

Source: Sub-regional fuel poverty data, Department for Business, Energy & Industrial Strategy (BEIS) 2019

ECONOMY

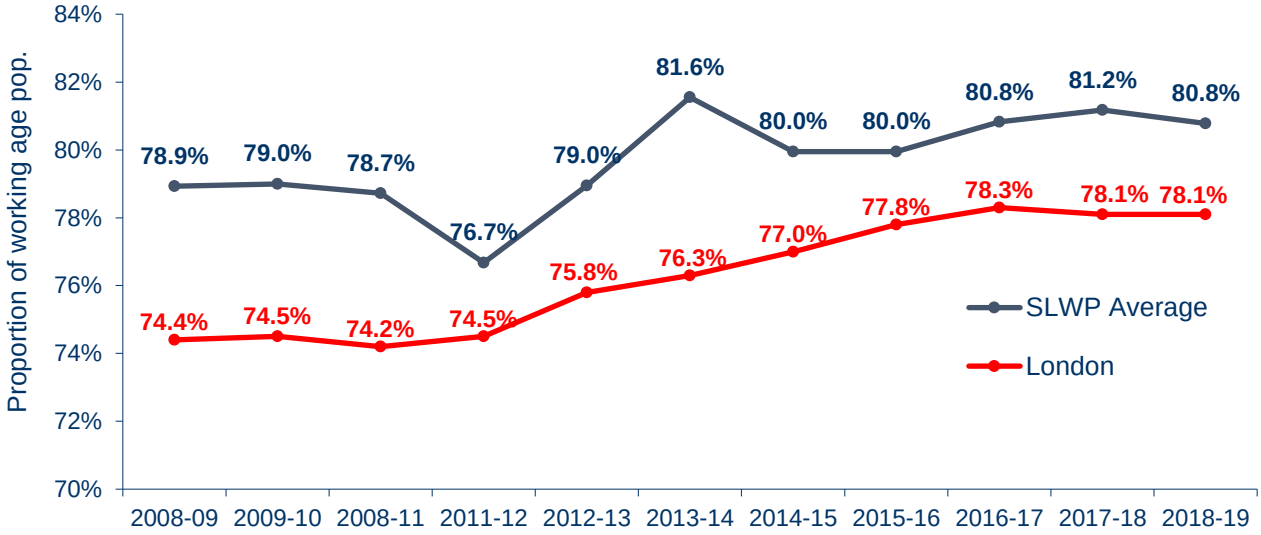
Economic activity

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

	Residents of working age (16-64)	Residents of working age (16-64) who are economically active	Proportion of working age (16-64) residents who are economically active
Croydon	195,200	251,700	77.6%
Kingston	92,900	119,400	77.8%
Merton	118,000	138,900	84.9%
Sutton	107,200	129,400	82.8%
SLWP	**513,300**	**639,400**	**80.8%**
LONDON	4,715,700	6,035,900	78.1%

Source: NOMIS website on behalf of ONS September 2019

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



Employment by occupation - economically active residents aged 16-64

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

Occupation	Croydon	Kingston	Merton	Sutton	**SLWP**	LONDON
Managers and Senior Officials	10.8% (21,200)	17.3% (15,600)	11.5% (13,400)	12.8% (13,600)	**12.5% (63,800)**	12.4% (573,800)
Professional Occupations	27.3% (53,700)	29.0% (26,100)	24.5% (28,400)	24.5% (25,900)	**26.4% (134,100)**	26.5% (1,224,600)
Assc Professional & Technical	(29,100) 14.8%	18% (16,200)	19% (22,100)	(15,100) 14.3%	**16.2% 82,500)**	(860,700) 18.6%
Administrative and Secretarial	11% (21,700)	7.2% (6,500)	10.2% (11,800)	12.1% (12,800)	**10.4% (52,800)**	9.1% (420,100)
Skilled Trades	6.3% (12,400)	6.3% (5,700)	7.1% (8,200)	10.0% (10,600)	**7.3% (36,900)**	(322,000) 7.0%
Personal service (e.g. caring)	9.7% (19,100)	7.7% (6,900)	7.9% (9,200)	7.8% (8,200)	**8.5% (43,400)**	7.2% (332,100)
Sales/ Customer Services	8.4% (16,400)	3.1% (2,800)	4.6% (5,400)	4% (4,200)	**5.7% (28,800)**	5.7% (261,900)
Plant & Machines Operatives	2.8% (5,500)	3.1% (2,800)	6.2% (7,200)	6.9% (7,300)	**4.5% (22,800)**	4.6% (211,700)
Elementary Occupations	8.4% (16,500)	8.4% (7,500)	8.4% (9,800)	7.5% (7,900)	**8.2% (41,700)**	8.4% (390,200)

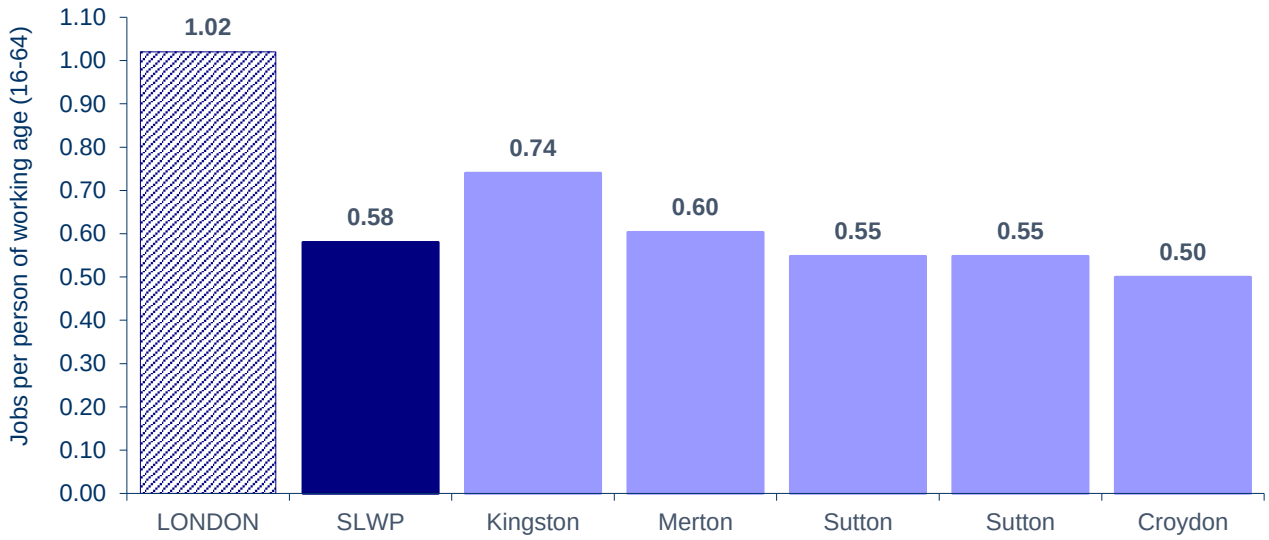
Job Density

Table 6.18: Employee jobs per resident of working age (16-64) for SLWP boroughs 2017

	Employee Jobs (full-time and part-time)	Residents aged 16-64	Job Density (Jobs/resident)
Croydon	155,000	248,175	0.62
Kingston	100,000	115,883	0.86
Merton	105,000	137,594	0.76
Sutton	84,000	129,609	0.65
SLWP	**444,000**	**631,261**	**0.70**
LONDON	6,122,000	5,973,028	1.02

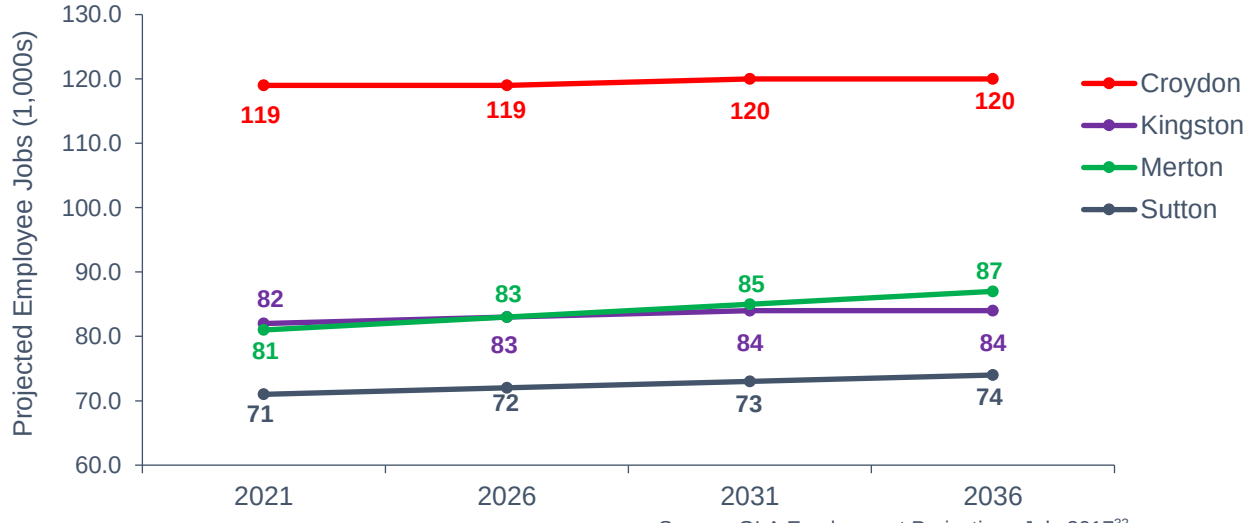
Source: NOMIS website on behalf of ONS September 2019

Figure 6.10: Job Density in LB Sutton and other South London Boroughs 2017



Employment projections

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



Source: GLA Employment Projections July 2017[32]

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

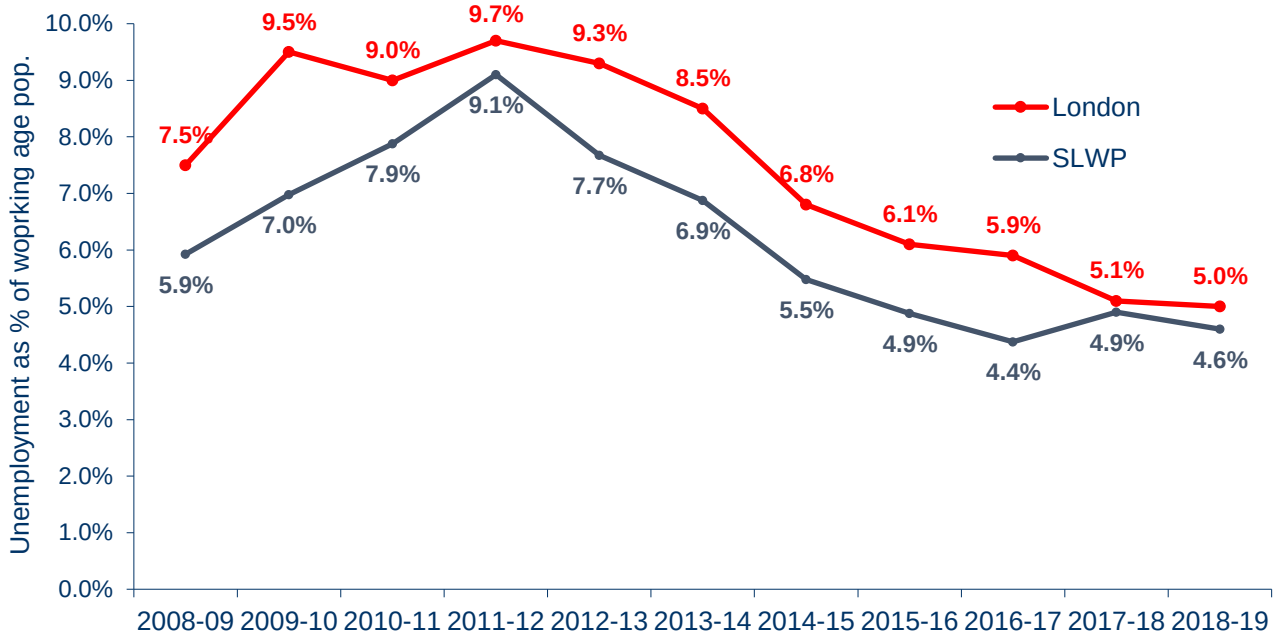
Unemployment

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

	Unemployed	Residents of working age (Aged 16-64)	Unemployment rate (%)
Croydon	8,000	195,200	4.1%
Kingston	5,400	92,900	5.8%
Merton	4,600	118,000	3.9%
Sutton	4,900	107,200	4.6%
SLWP	**22,900**	**513,300**	**4.6%**
LONDON	235,300	4,715,700	5.0%

Source: NOMIS website on behalf of ONS September 2019

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



Source: ONS annual population survey/ NOMIS website September 2019

Employment sites

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

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

Source: Local Plans

Occupancy of industrial land

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

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

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

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

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

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

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

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

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

Projected change in industrial floorspace

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

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

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

Projected land demand for industrial and warehousing uses

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

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

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

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

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

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

Projected land demand for apportioned waste as of 2016 (based upon the previous London Plan)[33]

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

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

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

Release of industrial land to other uses

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

	Development pipeline (LDD)	Local Plan/ Opportunity Areas/ Site Allocations	Total
Croydon	1.3	0	1.3
Kingston	0.6	0	0.6
Merton	0.7	0.1	0.8
Sutton	10.2	7.5[34]	17.7
SLWP	12.8	7.6	20.4

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

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

[34] as of September 2019, this land (at the former Felnex industrial estate in Hackbridge) is now under construction for residential uses

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

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

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

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

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

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

Borough classifications for the management of industrial floorspace capacity

Table 6.31: Management of industrial floorspace capacity – borough classifications (see also Table 6.2 of new London Plan) 2016-41[35]

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

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

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

Town Centre Network

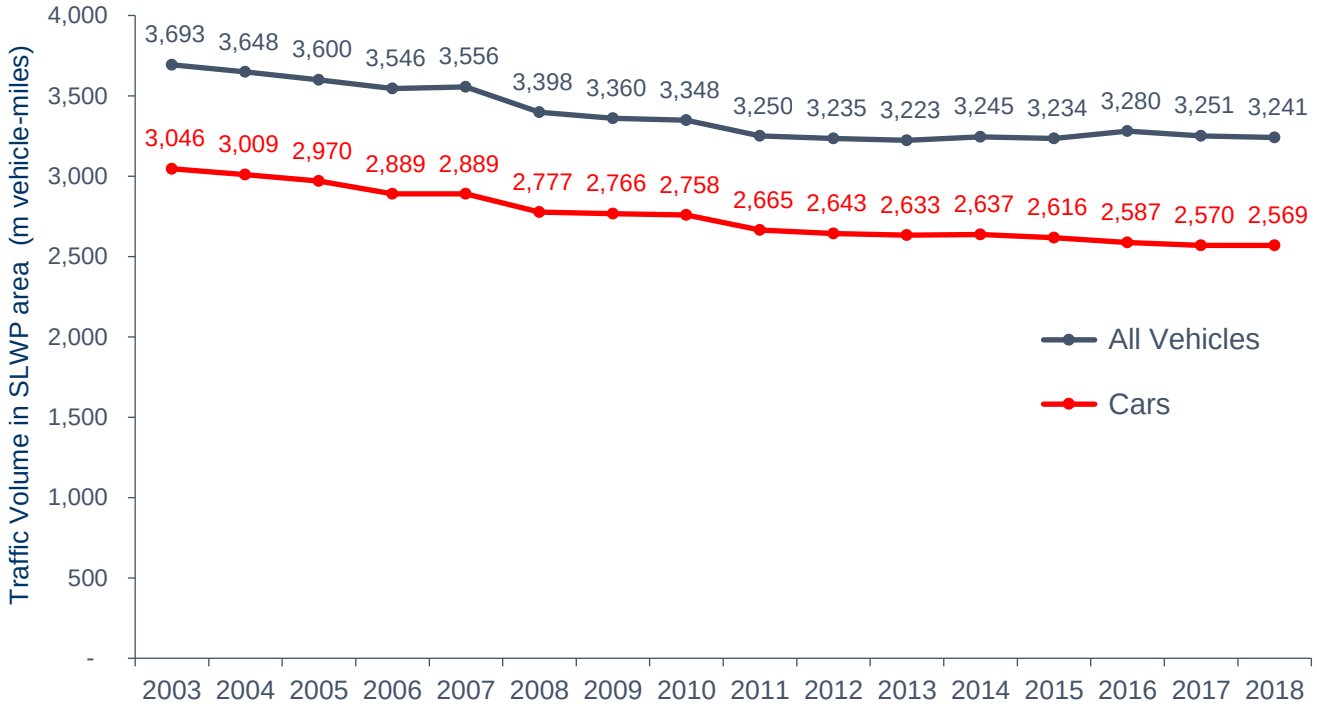
Table 6.32: Town centre network in SLWP area: retail floorspace and outlets

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

ENVIRONMENT

Traffic growth and congestion

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



Source: Department for Transport (DfT) 2019

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

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

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

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

Source: Department for Transport (DfT) 2019

Modal share

Table 6.35: Trips per day by borough of origin, and modal shares (average day) 2014/15 to 2016/17 for SLWP boroughs and plan area

	Croydon	Kingston	Merton	Sutton	**SLWP**	London
Total trips per day (000s)	755	379	429	392	**1,955**	18,165
Rail	7%	8%	6%	6%	**6.8%**	5%
Underground	0%	1%	6%	1%	**1.7%**	9%
Bus/tram	16%	12%	12%	10%	**13.1%**	14%
Taxi/other	1%	1%	1%	1%	**1.0%**	2%
Car/MC	51%	42%	43%	54%	**48.1%**	34%
Cycle	1%	4%	3%	2%	**2.2%**	3%
Walk	25%	33%	30%	26%	**27.8%**	33%

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

Road casualties

Table 6.36: Road casualties, people killed or seriously injured in road traffic collisions 2012-16

	Croydon	Kingston	Merton	Sutton	**SLWP**	London
2005-09 average	141	61	65	70	337	3,627
2012	107	34	65	42	248	3,018
2013	71	37	32	31	171	2,324
2014	71	39	50	29	189	2,167
2015	65	29	36	22	152	2,092
2016	76	38	44	30	188	2,501
2015 to 2016	17%	31%	22%	36%	24%	20%
2016 compared to 2005-09 baseline	-46%	-38%	-32%	-57%	-44%	-31%

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

Road Network

Table 6.37: Road classifications in SLWP area

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

Source: Department for Transport (DfT) 2019

Highway asset condition

Table 6.38: Highway asset condition – percentage of the principal road network length in poor condition and requires maintenance[32] for SLWP boroughs and plan area 2012-16

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

Source: Borough Local Implementation Plan (LIP) performance indicators (Transport for London, Report 10)

Air Quality[33]

Table 6.39: Air Quality Focus Areas within the SLWP area

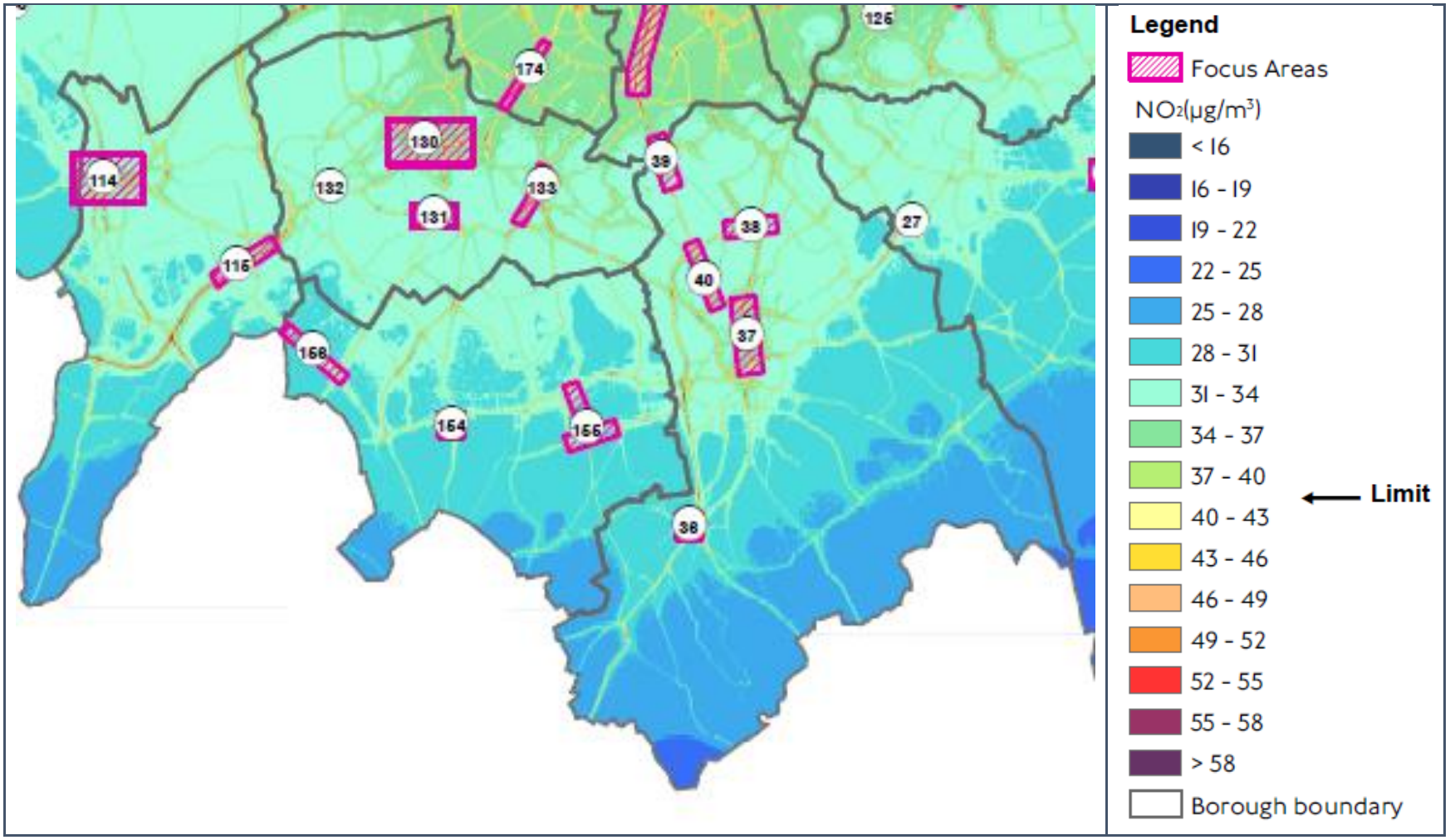
	Air Quality Focus Area
Croydon	Purley Cross and Russell Hill
	Wellesley Road
	Thornton Heath Brigstock Rd/High St/Whitehorse Lane
	Norbury London Road
	London Road between Thornton Heath Pond and St James Road
Kingston	Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road
	A3 Kingston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

Source: GLA Datastore 2019

[32] based on Detailed Visual Inspection survey data

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

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



Source: London Atmospheric Emissions Inventory 2016

Table 6.40: Air quality monitoring results for Croydon in 2018[34]

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

Source: London Air Quality Network (September 2019)

Table 6.41: Air quality monitoring results for Kingston in 2018

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

Source: London Air Quality Network (September 2019)

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

Table 6.42: Air quality monitoring results for Merton in 2018

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

Source: London Air Quality Network (September 2019)

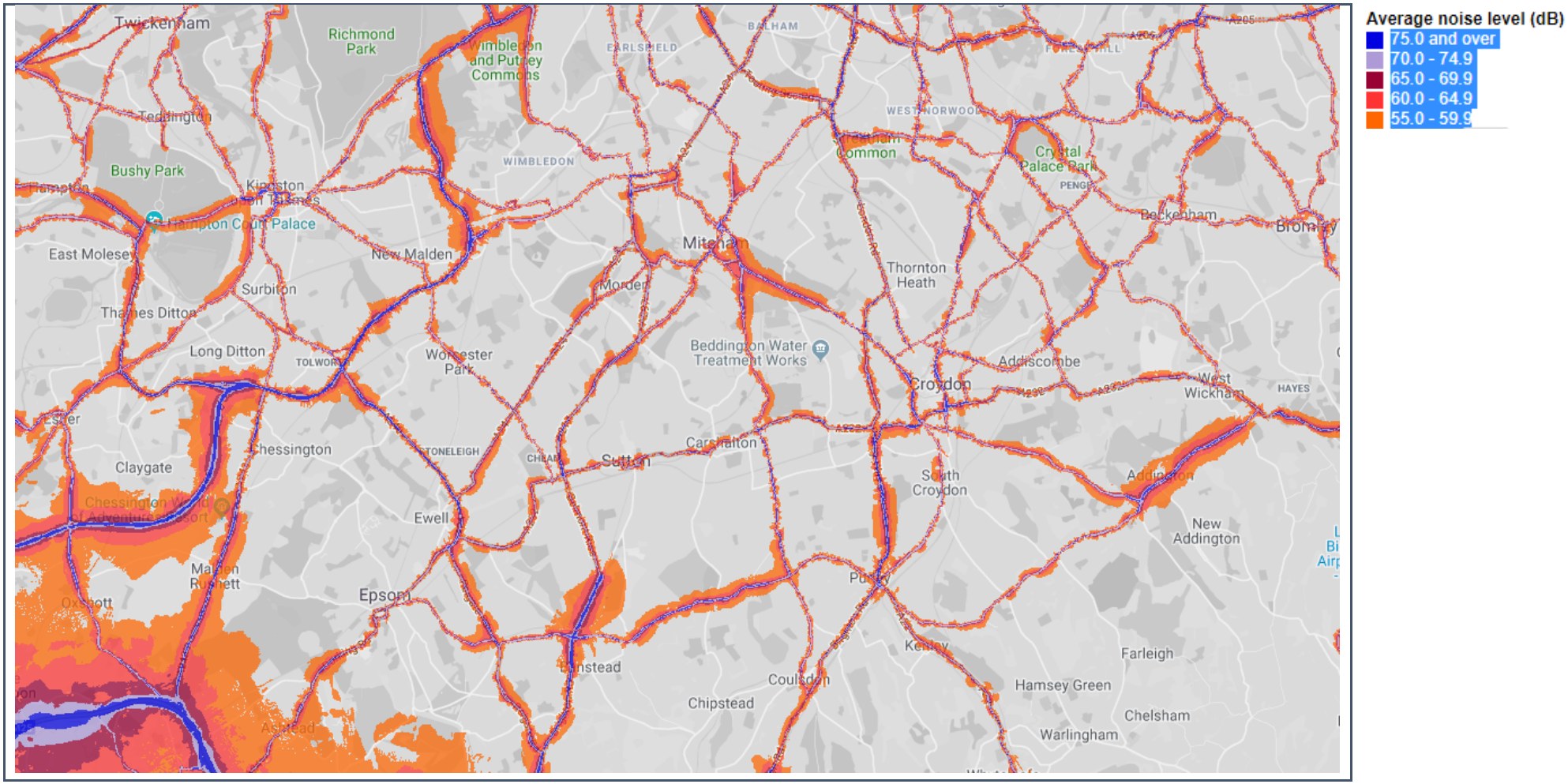
Table 6.43: Air quality monitoring results for Sutton in 2018

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

Source: London Air Quality Network (September 2019)

Noise exposure

Figure 6.15: Road traffic noise exposure in the SLWP area (Lden)[35]



Source: DEFRA Strategic Noise Mapping 2017

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

Carbon Dioxide (CO_2) Emissions

Figure 6.16: CO_2 emissions within the SLWP area - TOTAL

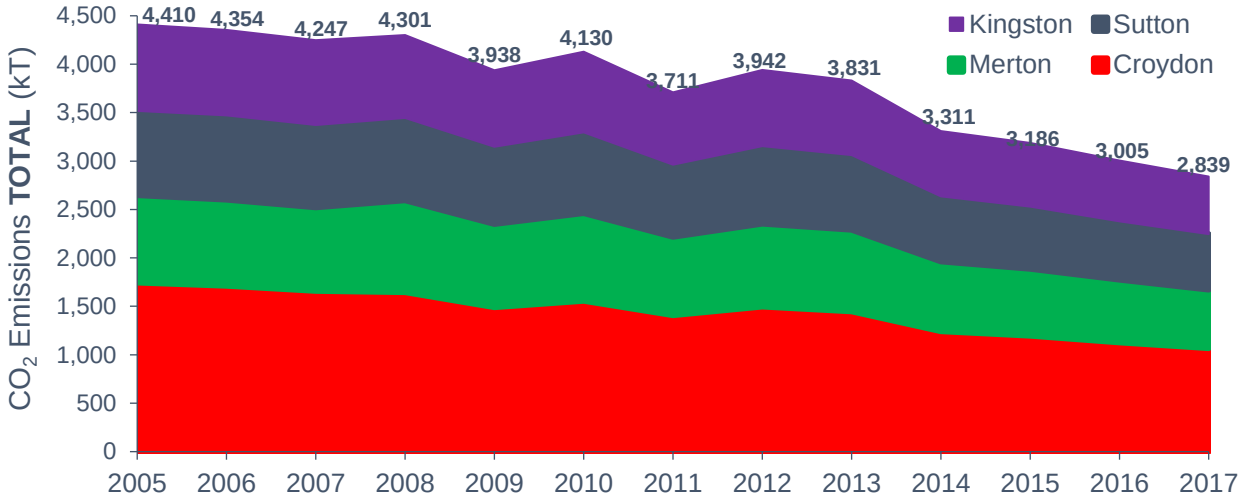


Figure 6.17: CO_2 emissions within the SLWP area - TRANSPORT

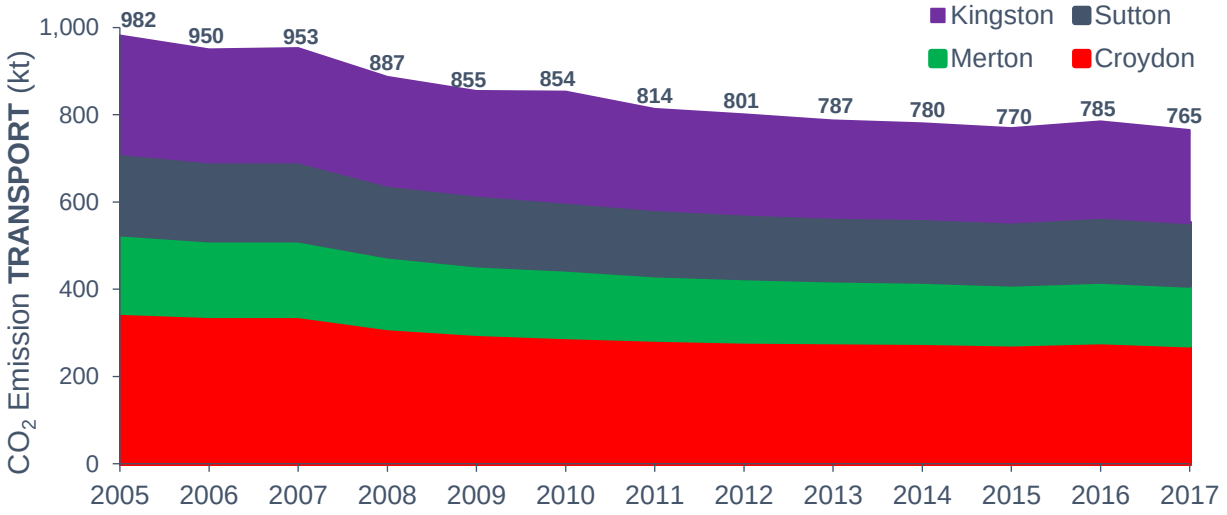
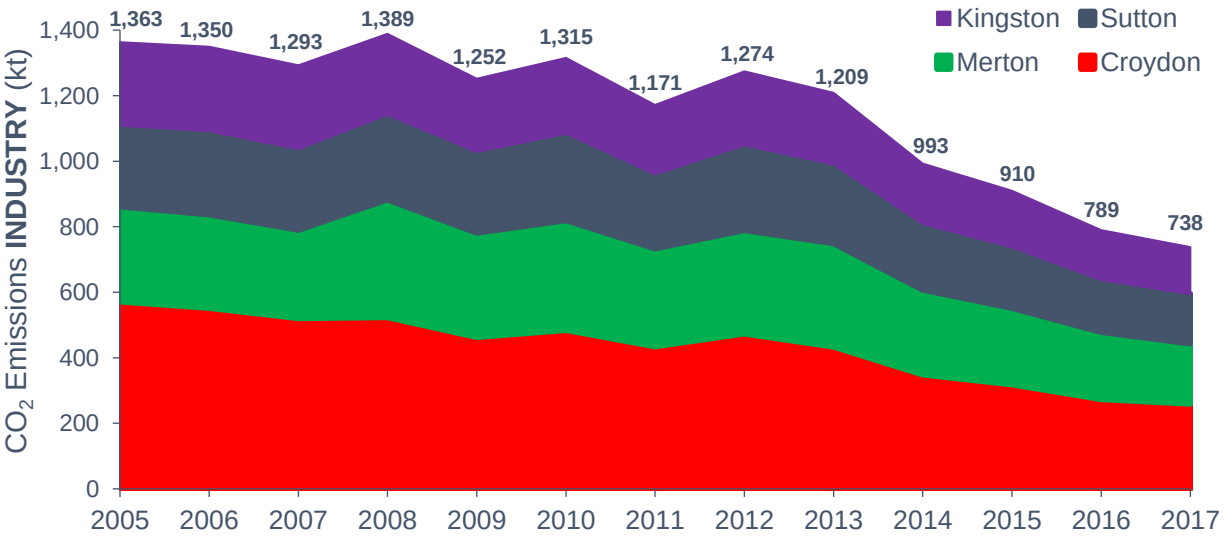
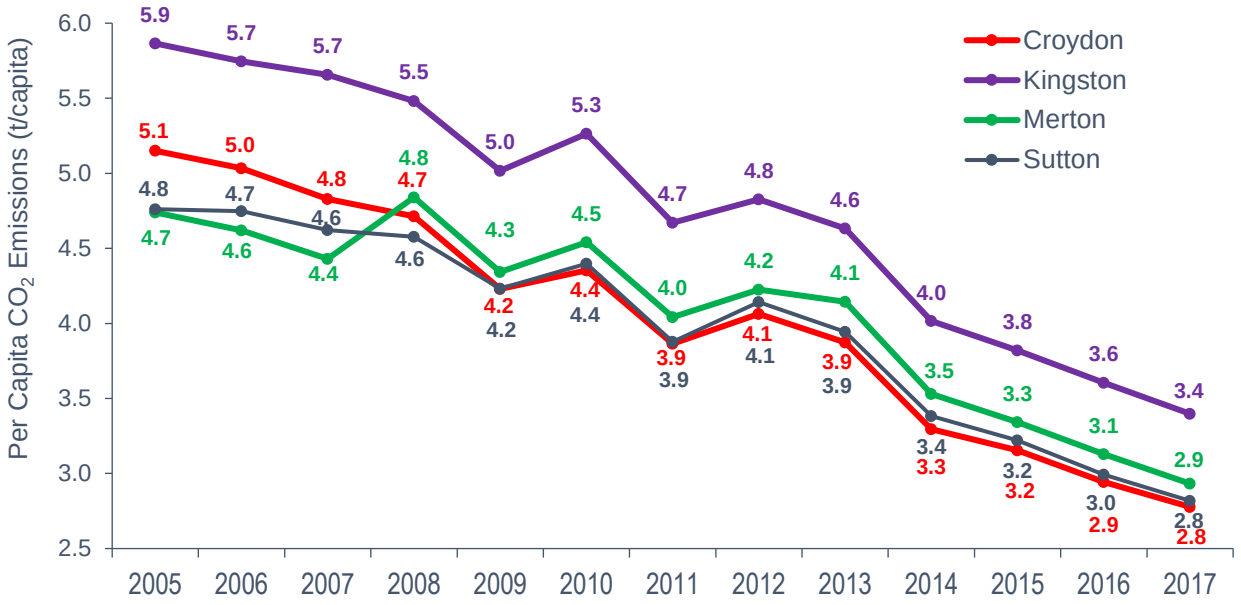


Figure 6.18: CO_2 emissions within the SLWP area - INDUSTRY AND COMMERCE



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

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



Climate Change

Table 6.44: UK climate trends

4th Annual State of the UK Climate Report (July 2018) [40]
• 2017 was the 5th warmest year in records dating back to 1910. • Average UK temperatures over the last decade (2008-2017) were 0.8°C warmer than the 1961-1990 average. • In contrast to summer 2018, UK summers have been notably wetter over the last decade (2008-2017), with a 20% increase in rainfall compared to 1961-1990. • Nine of the ten warmest years in the UK have occurred since 2002, and all of the top ten since 1990. • The Central England Temperature series, which extends back to 1659, shows that the 21st century has so far been warmer than the previous three centuries.; • Although 2017 was not perceived to be a particularly warm year, it was still more than 1°C warmer than the 1961-1990 baseline and ranks fifth warmest year overall for the UK. • Mean sea level around the UK has risen at a rate of approximately 1.4 mm per year since the start of the 20th Century. equivalent to a rise of about 16 cm.

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

Table 6.45: Future Climate Projections

Change in Climate	UKCP09 Emissions[41] Scenarios in the 2050s		
	Low Emissions	Medium	High Emissions
TEMPERATURE			
Increase in **winter mean temperature**	+2ºC	+2.2ºC	+2.5ºC
Increase in **summer mean temperature**	+2.5ºC	+2.7ºC	+3.1ºC
Increase in **summer mean daily maximum temp.**	+3.5ºC	+3.7ºC	+4.3ºC
Increase in **summer mean daily min temp.**	+2.7ºC	2.9ºC	+3.3ºC
RAINFALL			
Change in **annual mean precipitation**	0%	0%	0%
Change in **winter mean precipitation**	+12%	+14%	+16%
Change in **summer mean precipitation**	- 14%	- 19%	-19%

Source: UK Climate Impacts Programme Projections (UKCP09,

[40] the Met Office's Annual State of the UK Climate Report provides an up-to-date assessment of UK climate trends, variations and extremes based on the latest available climate quality observational datasets – see https://www.metoffice.gov.uk/news/releases/2018/state-of-the-climate-2017

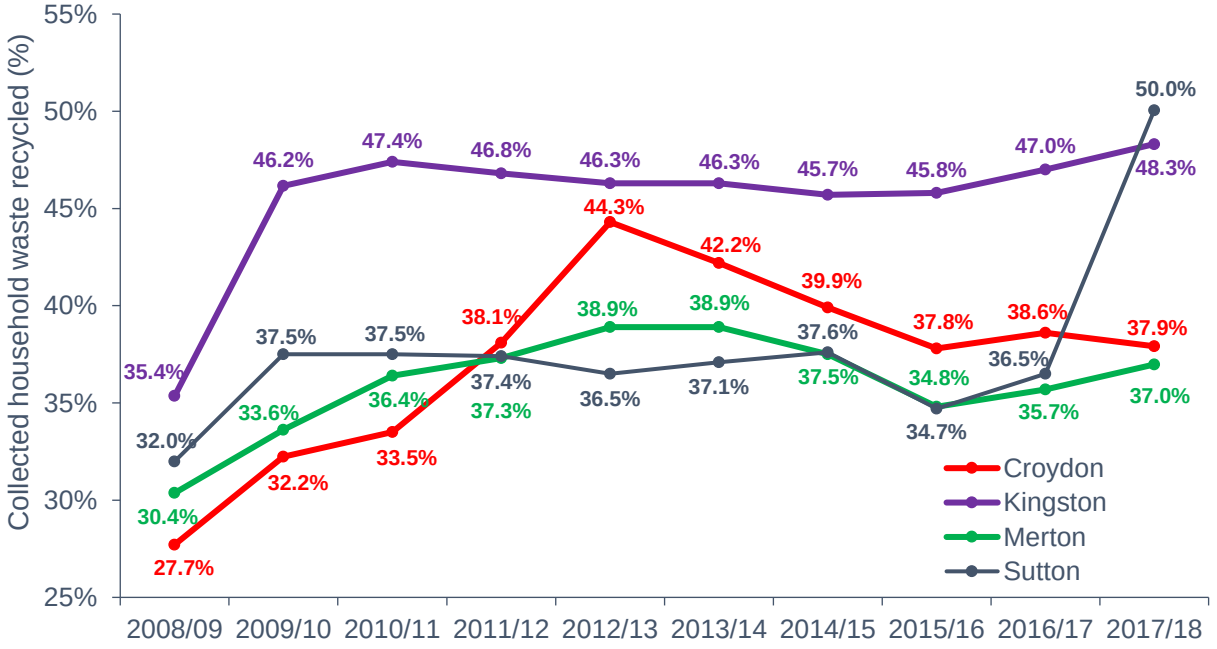
[41] the relevant UKCP18 projections are not yet available at the local level so the corresponding UKCP09 projections are quoted here

UK Climate Projections 2018 (UKCP18)
According to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPPC, 2014), atmospheric carbon dioxide (CO_2) levels in 2011 reached their highest point for almost 1 million years, rising to a new level of over 391 parts per million (ppm) compared to around 280 ppm prior to the industrial revolution. In the northern hemisphere, 1983 -2012 was the warmest 30-year period of the last 1400 years and 13 of the 15 hottest years on record globally have all occurred since 2000. By April 2018 average CO_2 levels had risen to a new high of 410 ppm. According to a Special Report[42] produced by the IPPC in November 2018, this has contributed to around a 1.0ºC increase in average global temperatures since pre-industrial times. The IPPC Special Report concluded that international efforts should stepped up to limit warming to 1.5ºC rather than the aspirational 2 ºC target set by the Paris Agreement in order to avoid catastrophic impacts on human health, ecosystems, critical infrastructure, water supply and economic growth. However, this can only be achieved if global CO_2 emissions start to fall well before 2030 through rapid and far-reaching transitions in energy supply, land-use, industry and transport. The latest UK Climate Projections 2018 (UKCP18)[43], published by the Met Office in November 2018, show that: • by 2070, in the high emission scenario[44], average warming across the UK is projected to range from 0.9 °C to 5.4 °C in summer, and from 0.7 °C to 4.2 °C in winter. • hot summers are expected to become more common. In the recent past (1981-2000) the chance of seeing a summer as hot as 2018 was low (<10%). The chance has already increased due to climate change and is now between 10-20%.With future warming, hot summers by mid-century will be even more common (~50%). • human-induced climate change has made the 2018 record-breaking UK summer temperatures about 30 times more likely than it would be naturally. • by 2070, in the high emission scenario, average changes in rainfall patterns across the UK are projected to range from -47% to +2% in summer, and between -1% to +35% in winter. • by the end of the century, sea levels are projected to rise between 0.53m & 1.15m (high emission scenario).

UK Climate Projections 2018 (UKCP18)[45], published by the Met Office in November 2018

Household waste recycling rate

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



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

Source: DEFRA statistics January 2019

Flood Risk

CROYDON

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

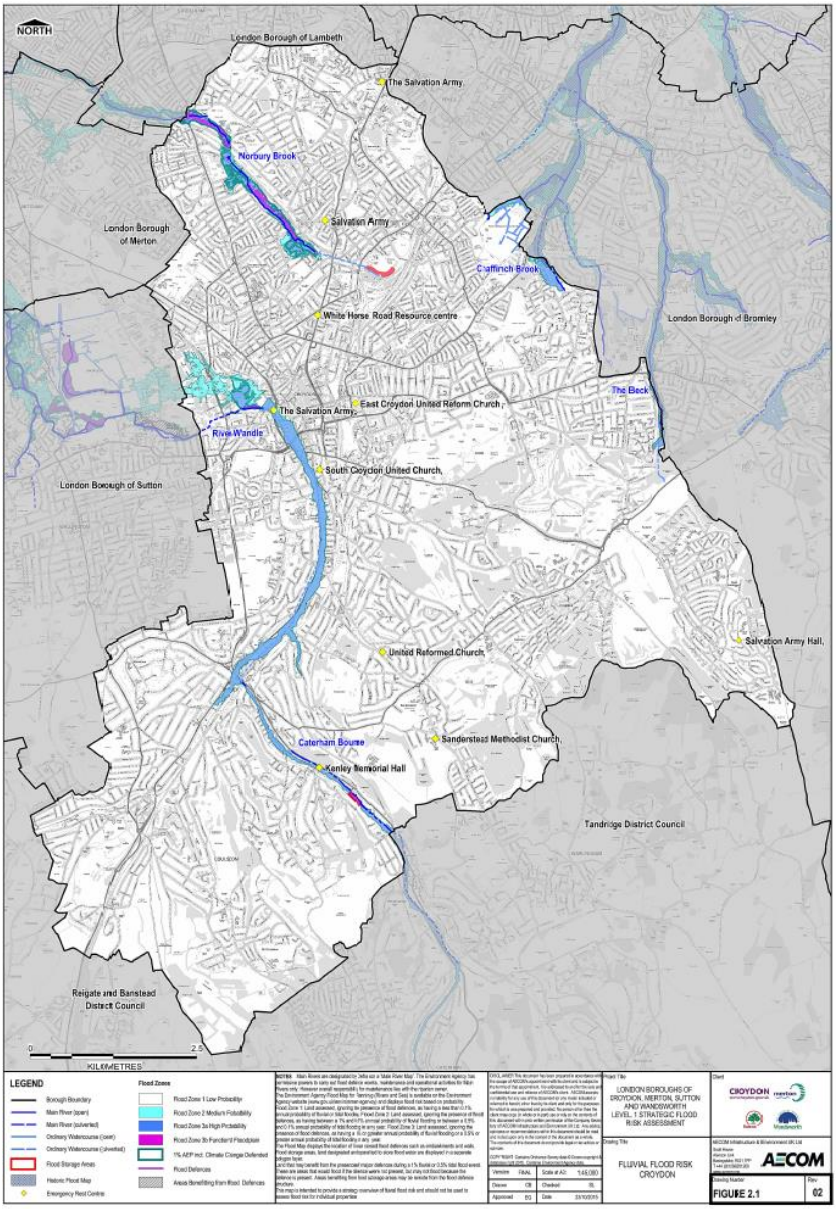
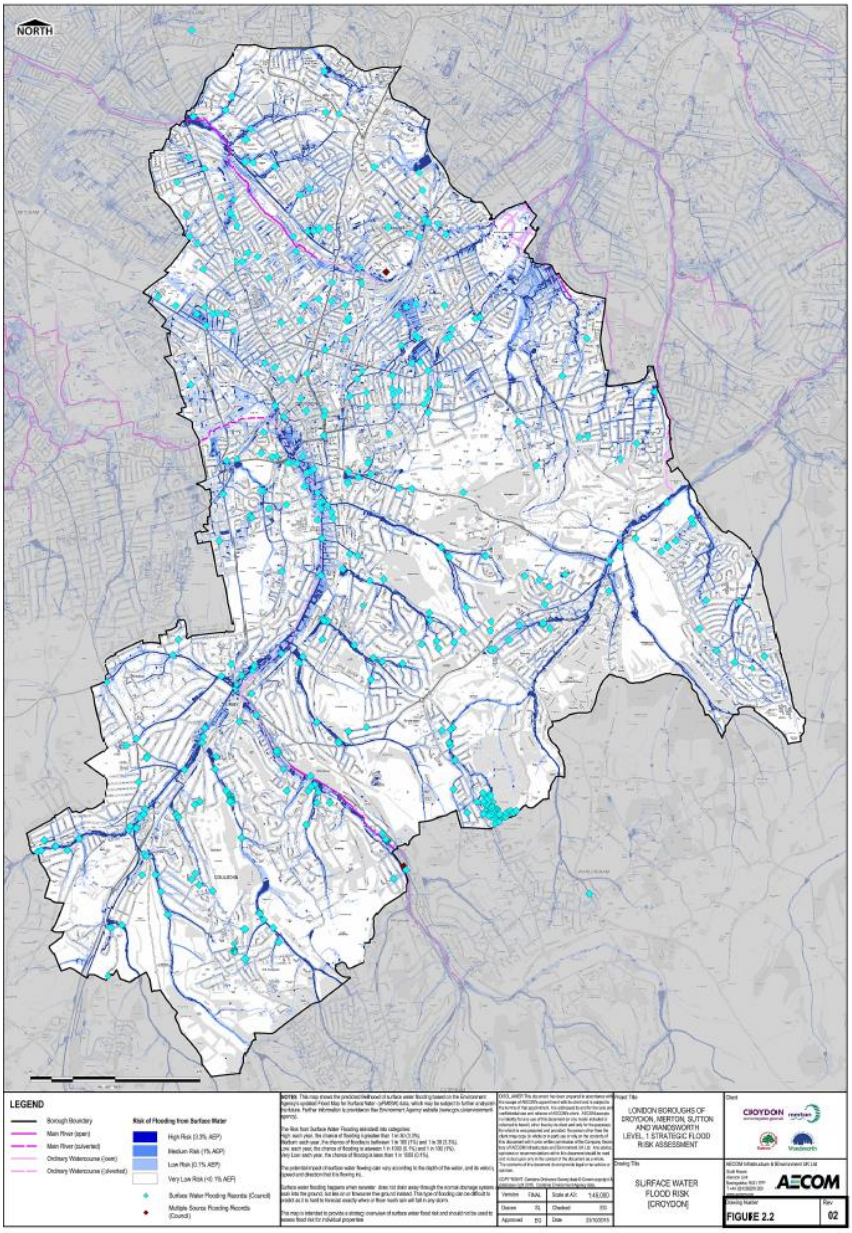


Table 6.46: Fluvial flood risk in Croydon – Properties located within EA Flood Zones

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

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

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



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

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

RoFSW [46]Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability (<1%)	32,090	1,434	1,722
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	10,094	871	638
High	More than 1 in a 30 annual probability (>3.3%)	5,856	737	513

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

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

KINGSTON

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

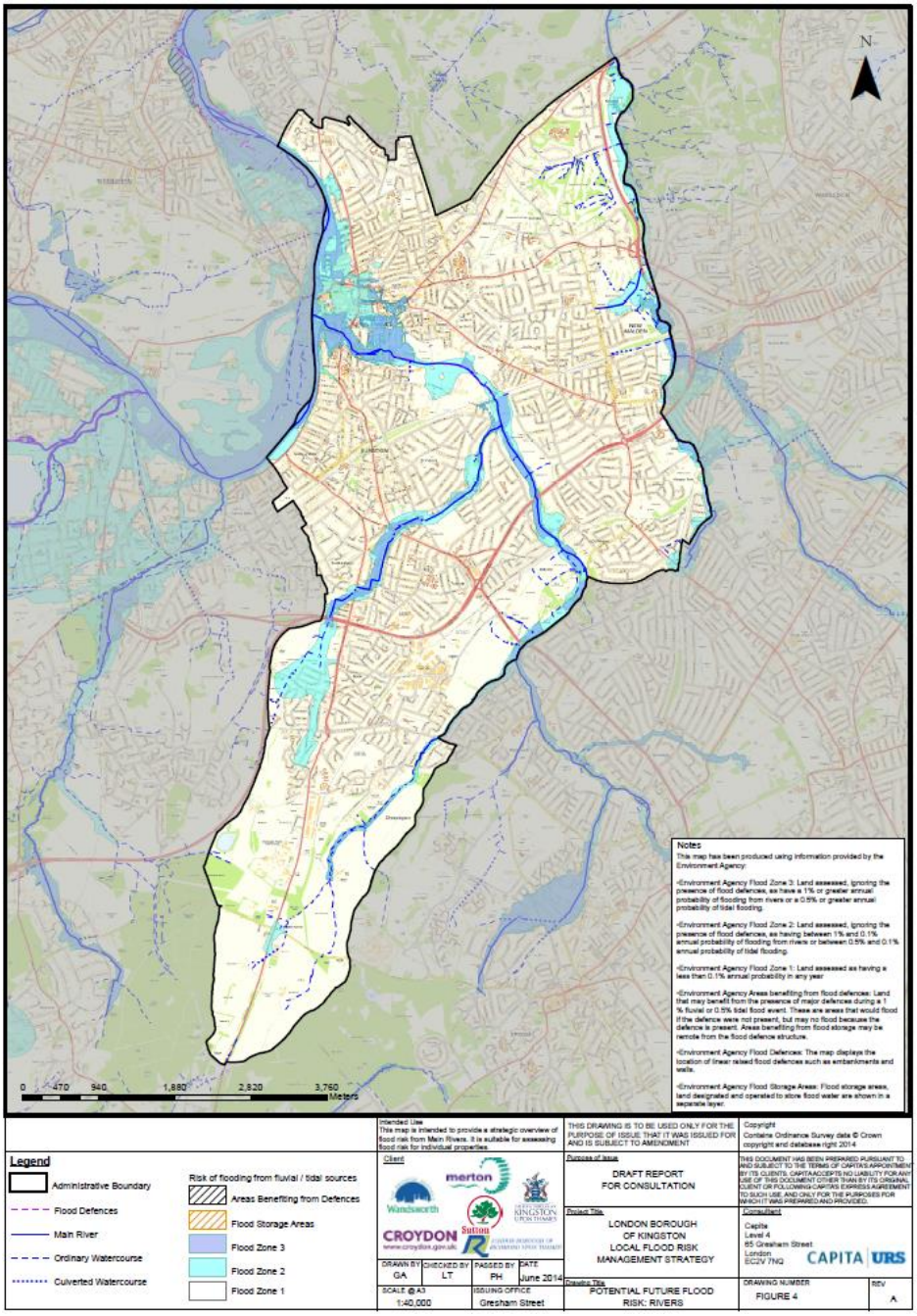


Table 6.49: Fluvial flood risk in Kingston - Properties located within EA Flood Zones

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

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

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

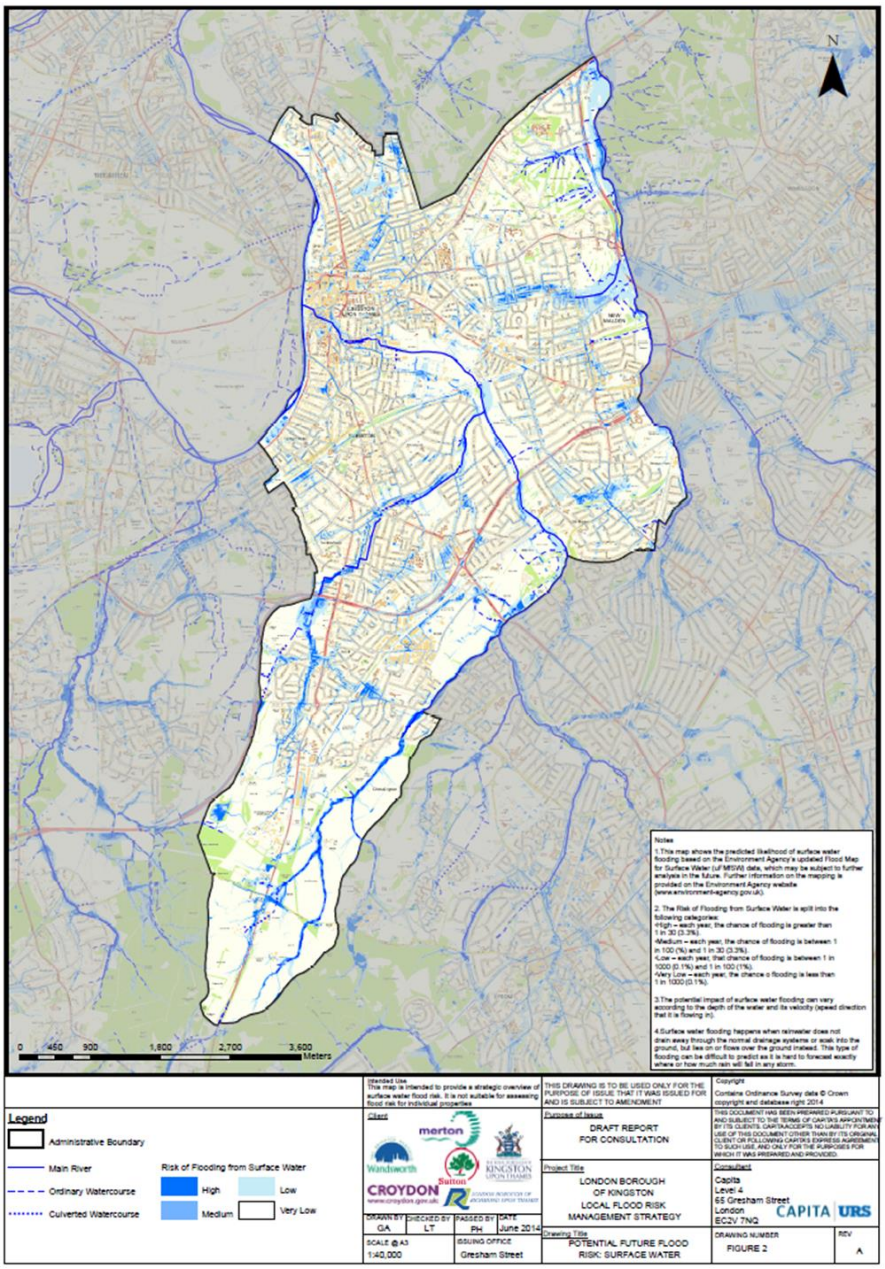


Table 6.50: Surface Water Flooding in Kingston: Dwellings at Risk in the 1 in 100 year event

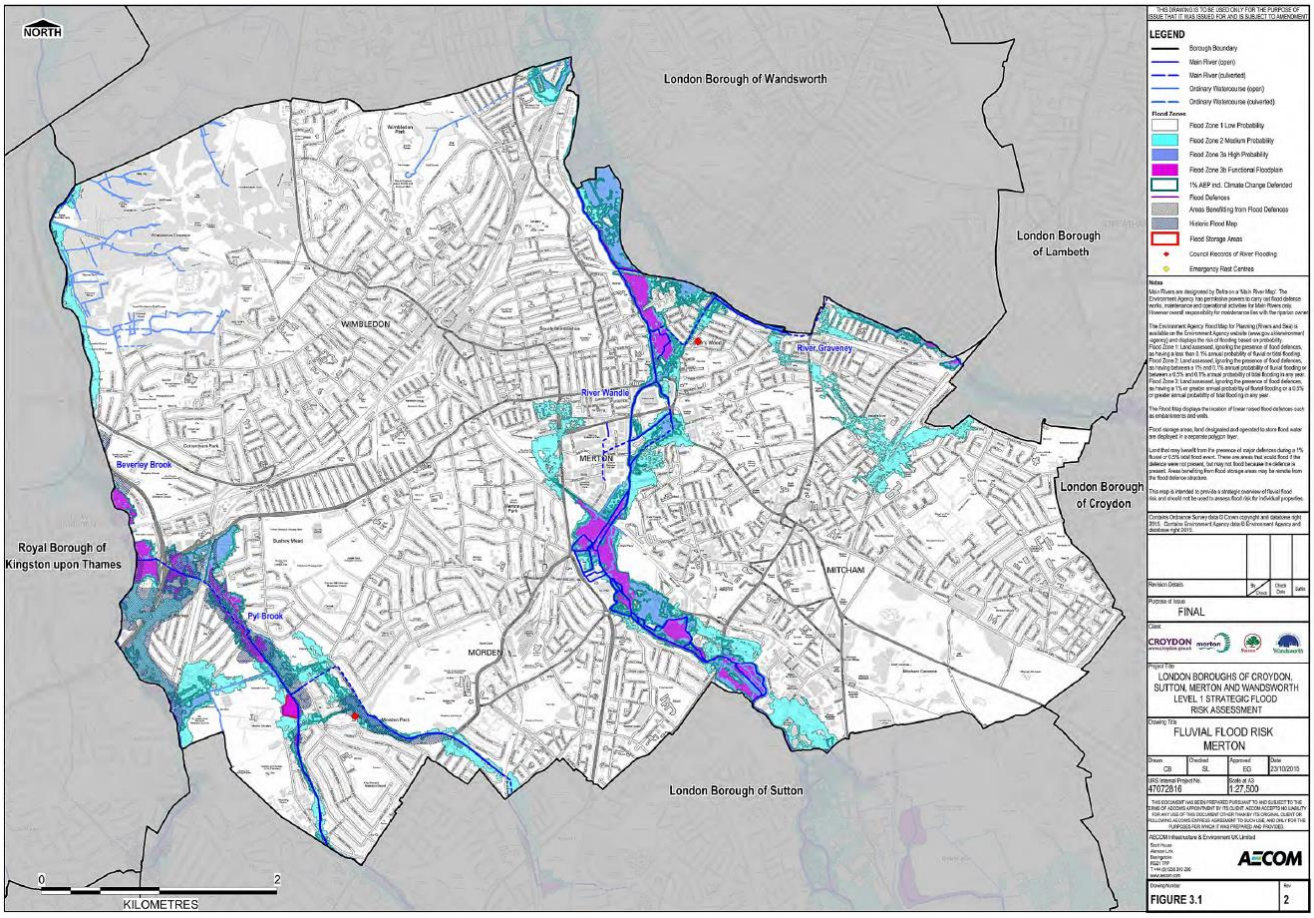
RoFSW [47]Category	Surface Water Flood Risk	Dwellings	Non-Residential	Unclassified
Low	Less than 1 in 100 annual probability (<1%)	*data not available*	*data not available*	*data not available*
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	*data not available*	*data not available*	*data not available*
High	More than 1 in a 30 annual probability (>3.3%)	*data not available*	*data not available*	*data not available*

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

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

MERTON

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



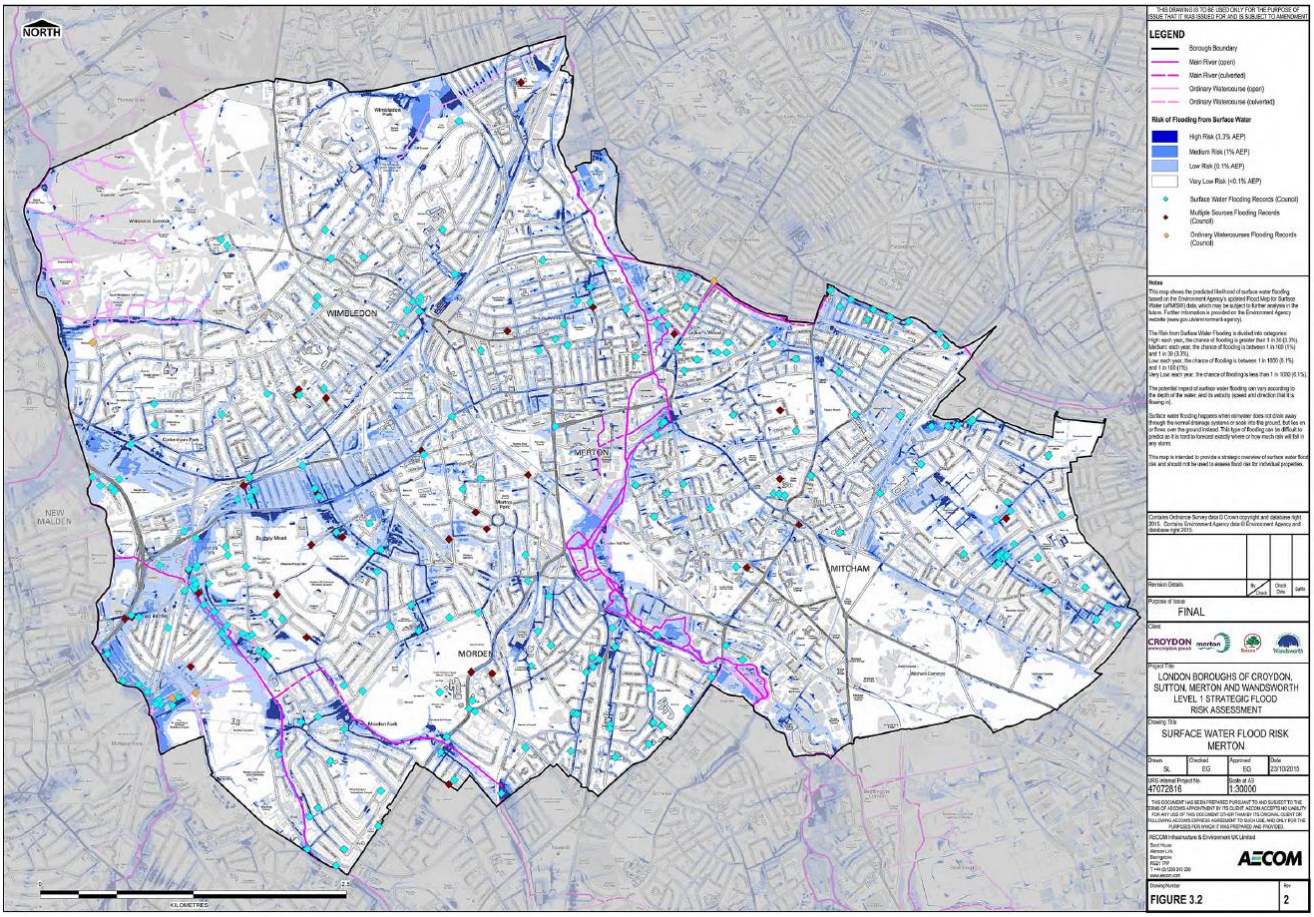
Source: SFRA Level 1 Report (AECOM, December 2015)

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

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

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

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



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

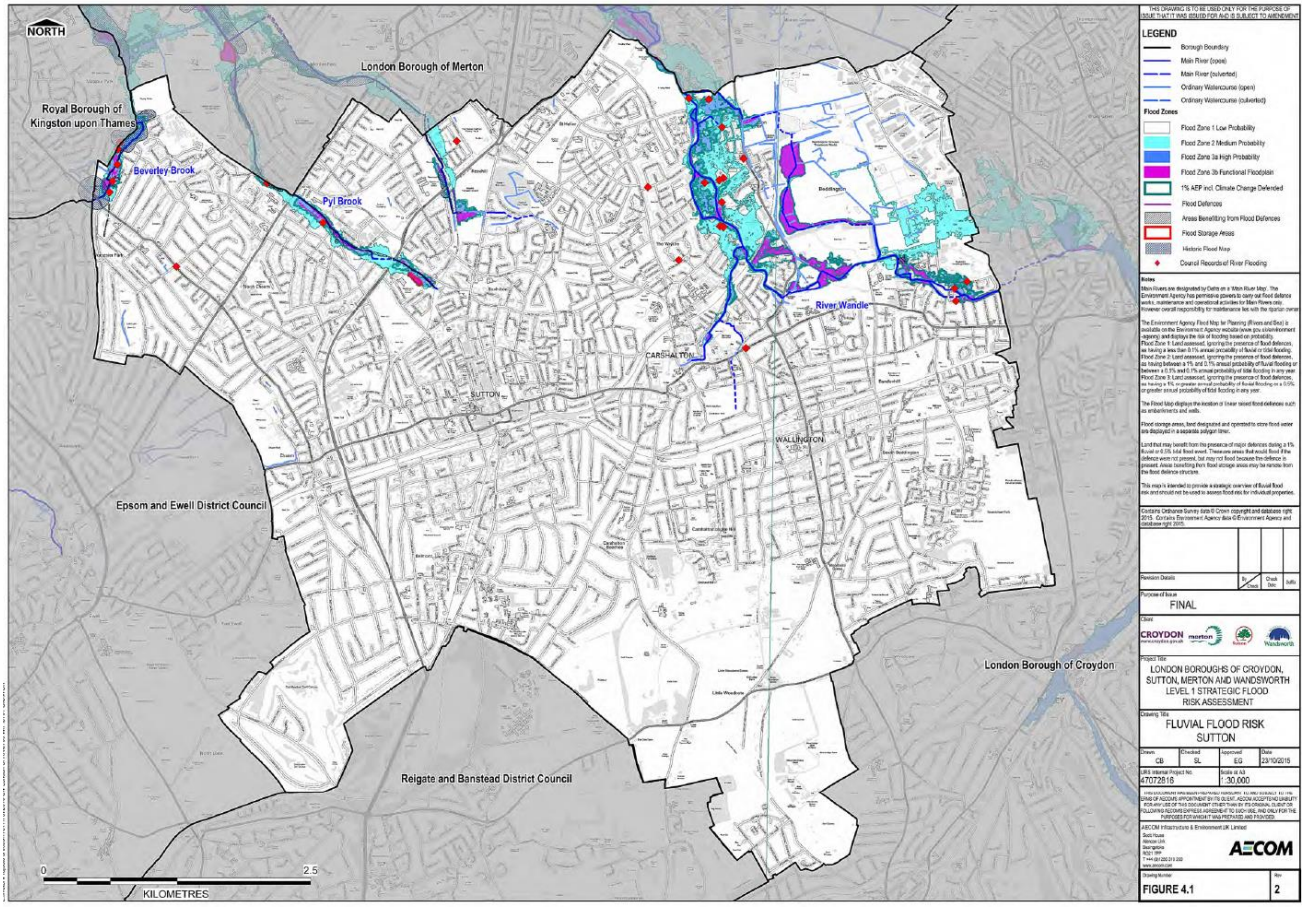
Table 6.47: Surface Water Flooding: Dwellings at Risk in Merton in the 1 in 100 year event

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

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

SUTTON

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



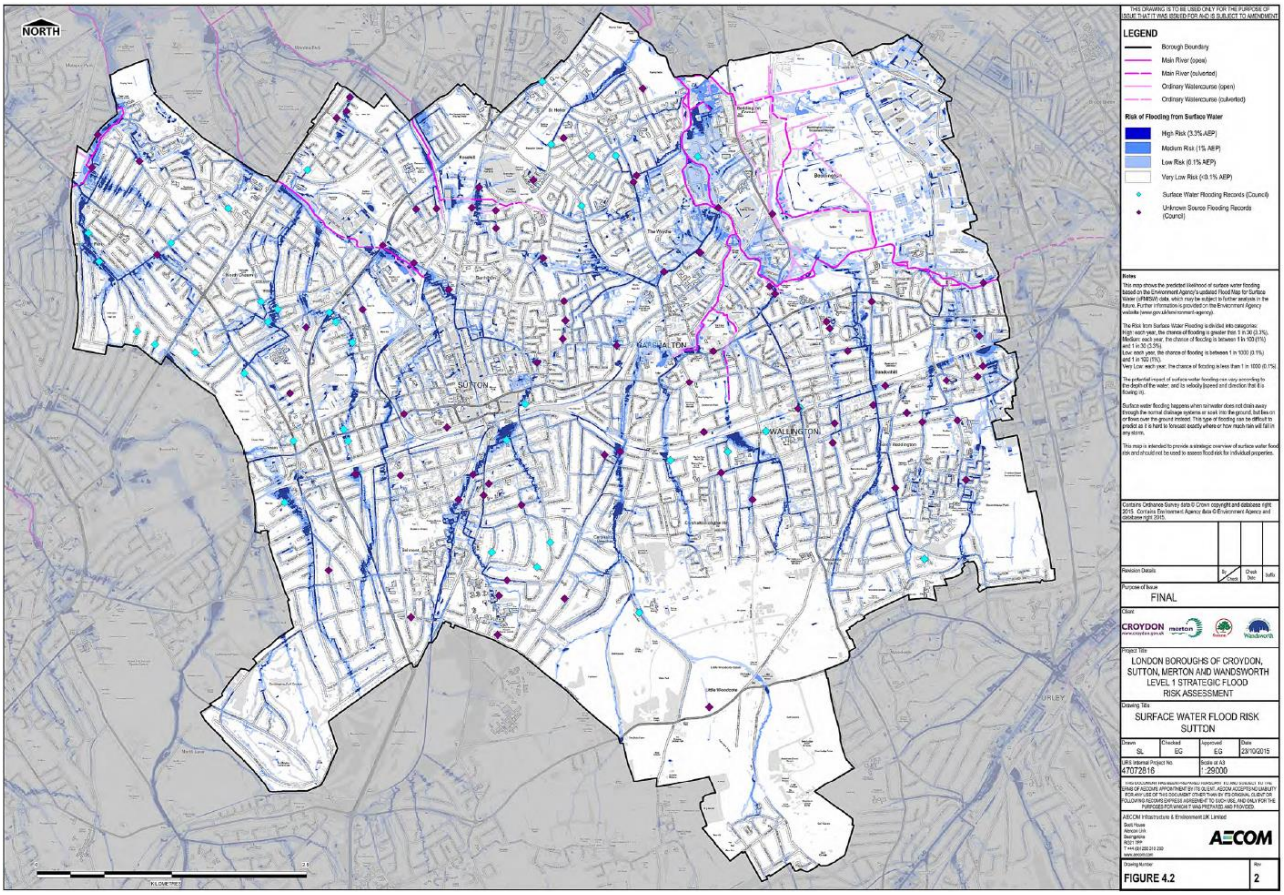
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

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

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

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

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



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

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

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

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

Sites of Importance for Nature Conservation (SINCs)

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

	Number of SINCs	SINC Area (ha)			SINC as percentage of borough
		Statutory Designations[48]	Non-Statutory	Total SINC	
Croydon	74	355 ha	1,245 ha	1,598 ha	18.5%
Kingston	38	46 ha	361 ha	405 ha	10.9%
Merton	57	322 ha	515 ha	836 ha	22.2%
Sutton	47	37 ha	634 ha	688 ha	15.7%

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

Species, habitats and ancient woodland

Table 6.55: Species and habitats

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

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

Green Belt and Metropolitan Open Land (MOL)

Table 6.56: Green Belt and MOL

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

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

Open Space

Table 6.57: Open space

	Number of Open Spaces	Open Space Area (ha)	Percentage of Open Space
Croydon	362	2,787	32.2%
Kingston	264	1,378	37.0%
Merton	327	1,330 ha	35.4%
Sutton	47	688 ha	15.7%

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

Green Infrastructure

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

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

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

Conservation Areas and Historic Environment

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

	Conservation Areas	Areas of Special Local Character (ASLCs)	Listed Buildings Grade I, II or II* (at risk)	Locally listed buildings	Scheduled Ancient Monuments	Historic Parks and Gardens
Croydon	12	24	150 (6)	1,000 (apprx)	7	not available
Kingston	26 (277 ha)	15	12 (3)[49]	148	6	not available
Merton	28 (657 ha)	n/a	250	1,042	3	3
Sutton	15 (208.2 ha)	22	188 (4)	106	6	5

Source: Historic England and Local Plans

Table 6.60: Archaeological Priority Areas: Croydon

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

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

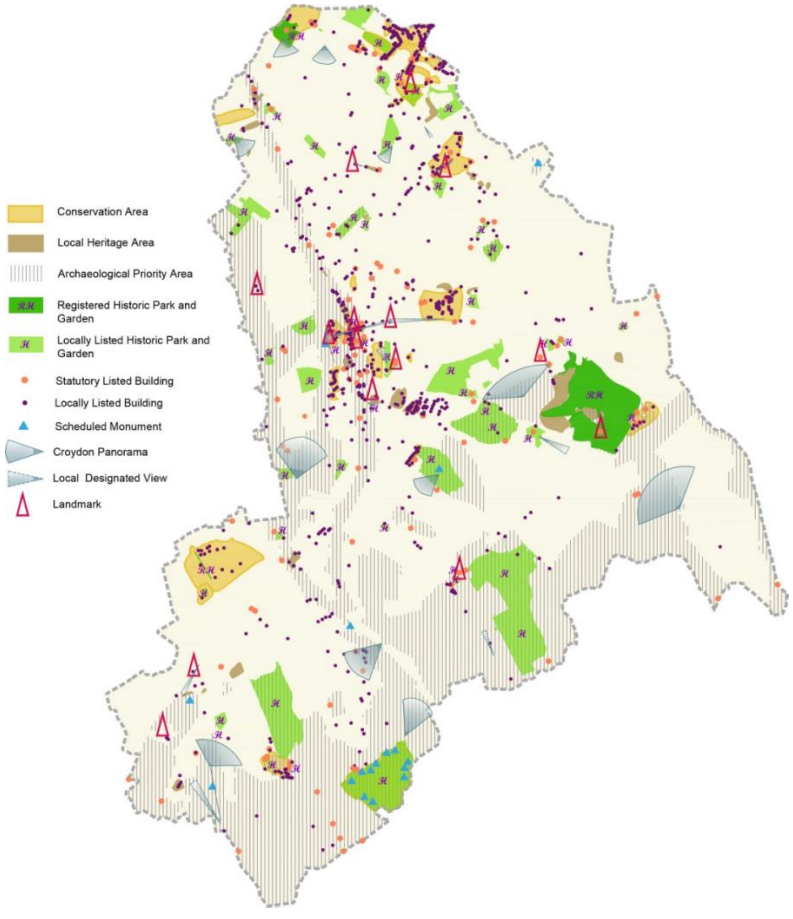
[49] despite the small number of statutory listed buildings in Kingston, there are over 200 designated 'Buildings of Townscape Merit' (BTM)

Table 6.61: Archaeological Priority Areas: Merton

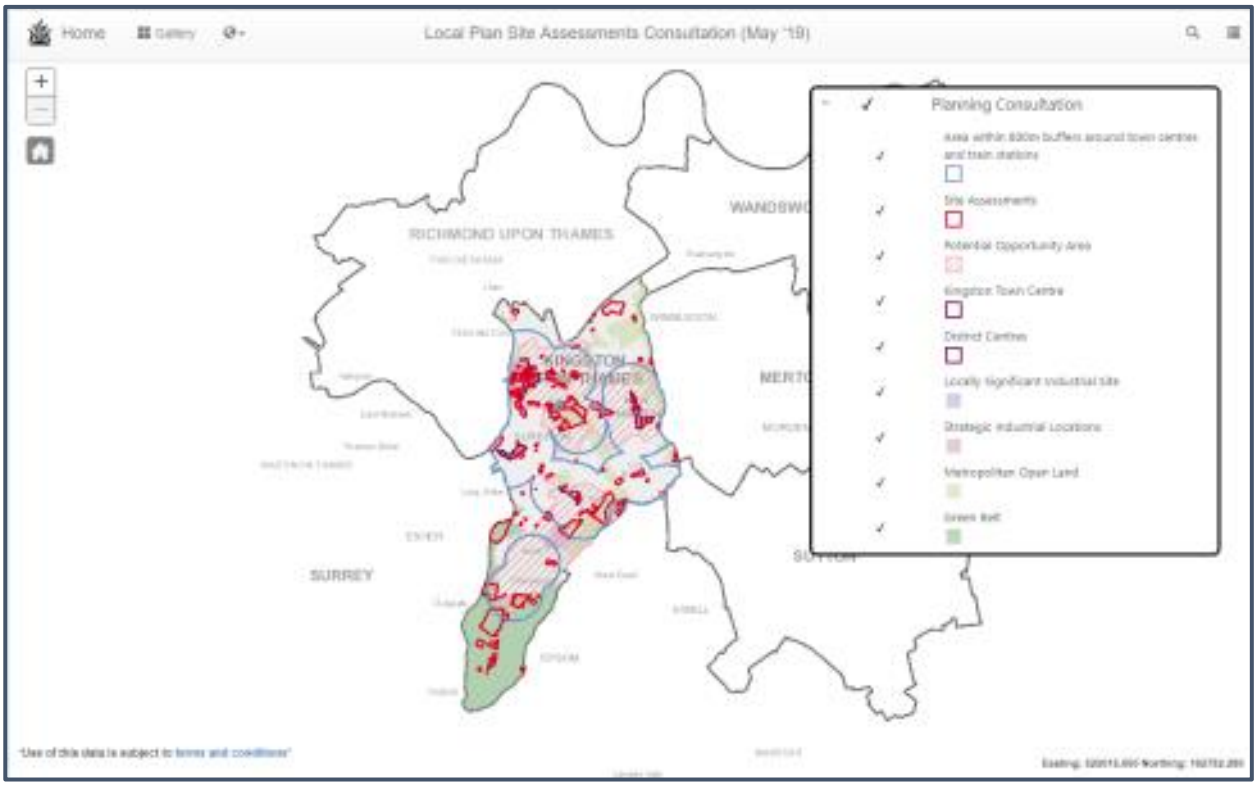
APA	Size	APA	Size
TIER 1			
Caesar's Camp	27.35	Morden Park Mound	0.42
Merton Priory	10.28	Ravensbury Saxon Cemetery	10.79
		Tier 1 Total	**48.84 ha**
TIER 2			
Wandle Valley / Colliers Wood	93.13	Cannizaro	67.64
Wandle Valley / Morden Hall Park	59.97	Cannon Hill	20.81
Wandle Valley / Mitcham	74.18	Merton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

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

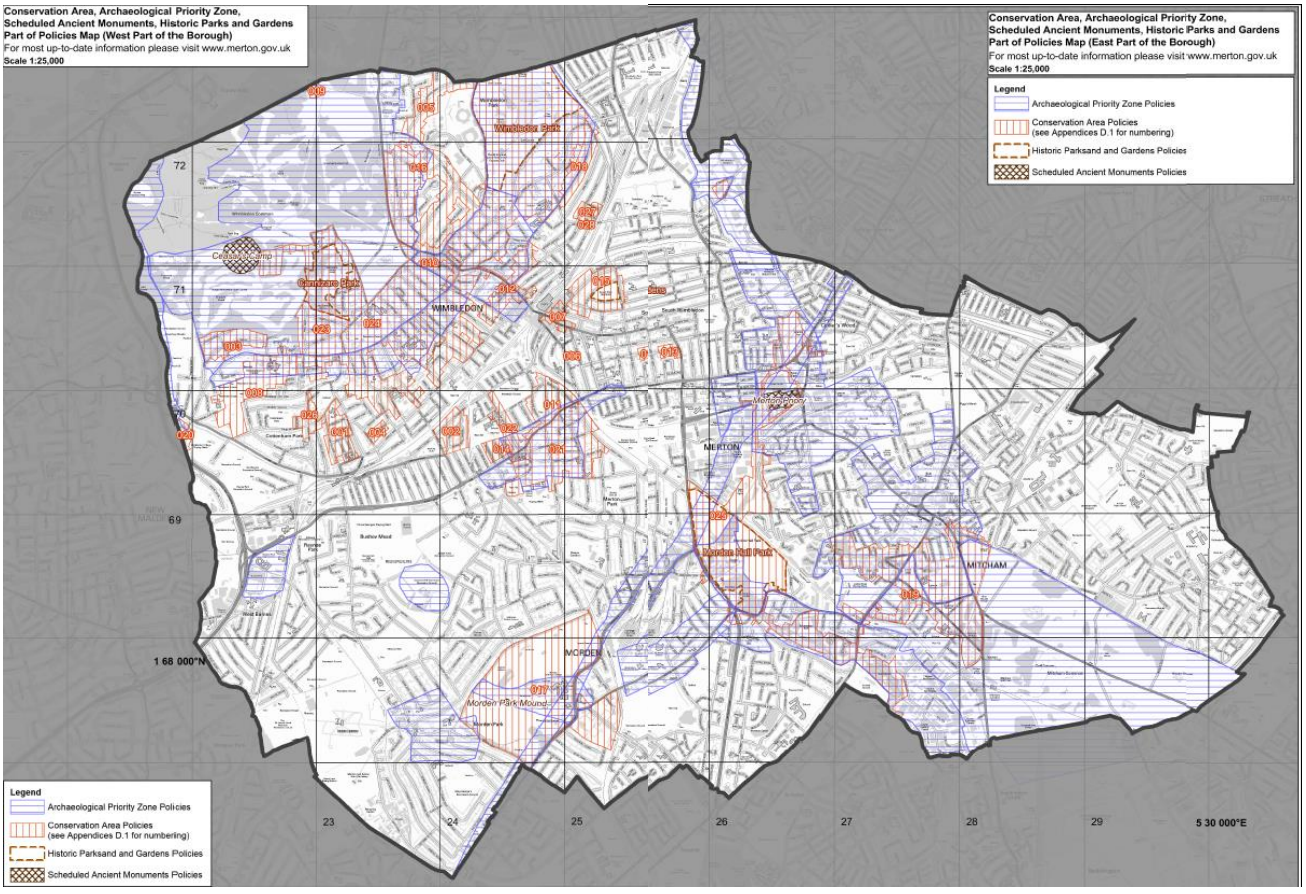
Heritage Map of Croydon



Heritage Map of Kingston[50]

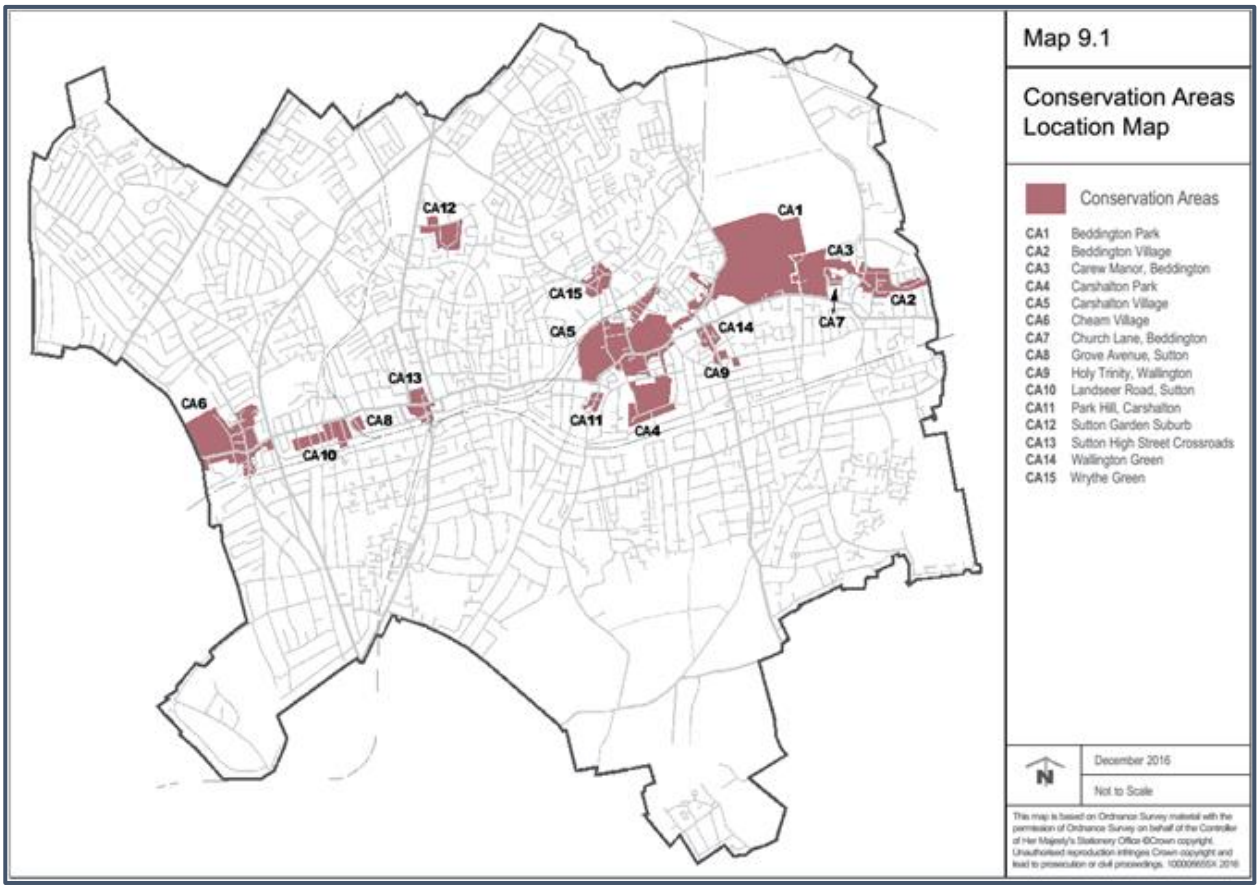


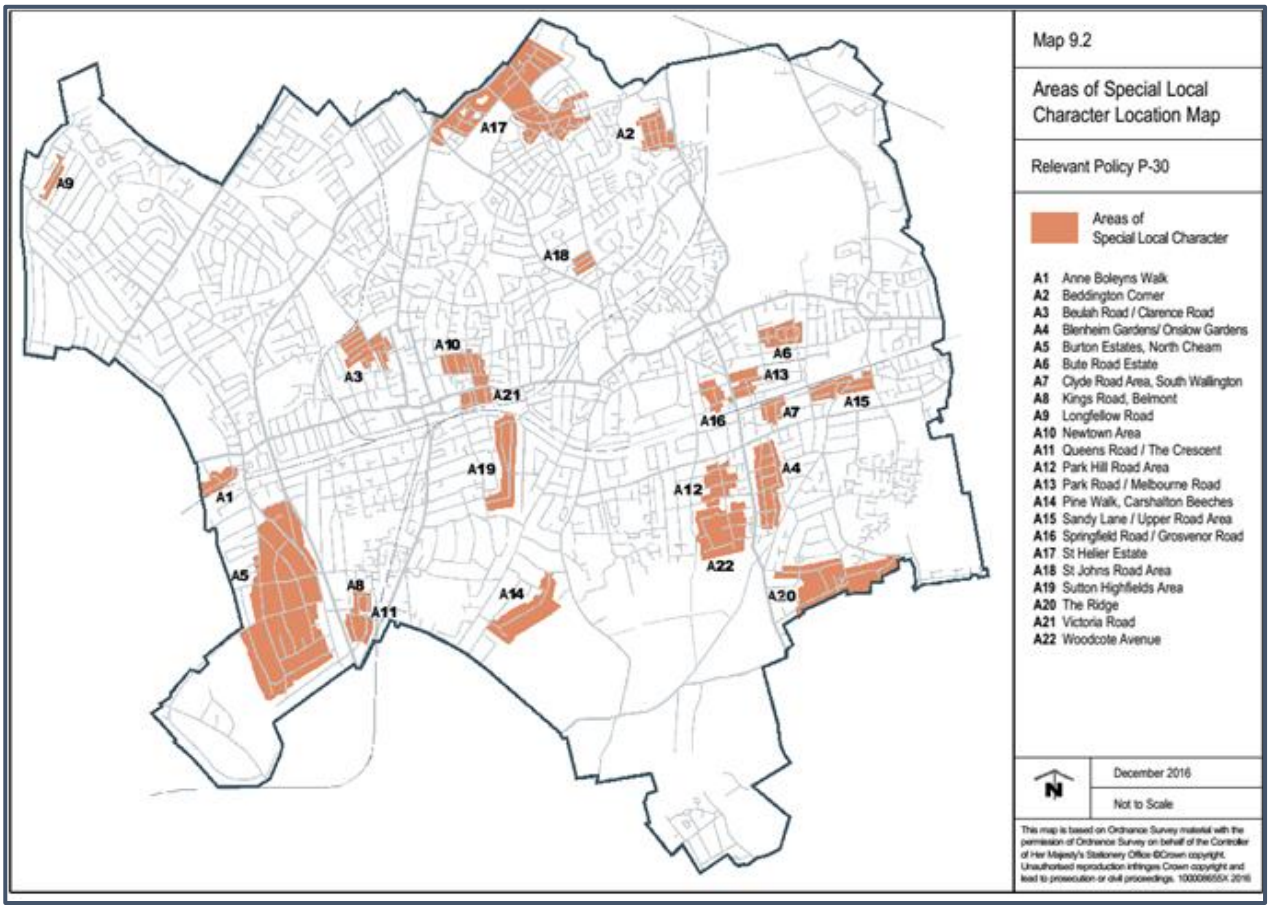
Heritage Map of Merton[51]



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

Heritage Maps of Sutton





7 KEY SUSTAINABILITY ISSUES (TASK A3)

Identifying key sustainability issues and problems

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

- other policies, plans, programmes and sustainability objectives relevant to or likely to be affected by the new plan as set out in Section 5 of this document;
- the current environmental, social and economic baseline for the four boroughs and future trends, including projected household growth and industrial land supply, over the plan period to 2036 (Section 6);
- existing and planned waste management facilities within South London, annual throughputs of local authority collected waste (household), commercial and industrial (C&I), construction, demolition and excavation waste (CD&E) and other waste streams; waste imports and exports to and from the plan area; and current performance against the London Plan 2016 apportionment (Section 6);
- existing planning constraints and opportunities for promoting sustainable waste management in south London; and
- key sustainability issues identified in government guidance on SA[52], current best practice and criteria developed previously for the purpose of appraising the existing SLWP, Sutton's Local Plan 2018 and the draft new London Plan.

7.2 Further sustainability issues may subsequently be identified in the light of feedback from statutory consultees in relation to the SA Scoping Report (this document) and the response to public consultation at the 'Issues and Options' stages.

Issue 1: Sustainable Waste Management: Self-Sufficiency

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

- how much additional land should the plan allocate for sustainable waste management to meet the combined apportionments for household and C&I waste[53] in the draft new London Plan (i.e. net self sufficiency) over the plan period?
- should the plan seek to either:
  - meet the new apportionment targets by safeguarding sufficient land and sites to manage 100% (and no more) of projected household and C&I waste arisings over the plan period to 2036? or
  - seek to exceed the new apportionment targets by allocating additional land, promoting the intensification of existing sites or converting existing waste transfer facilities to waste management facilities?
- to what extent should the plan seek to manage future CD&E or hazardous waste arisings[54] within South London by allocating additional land, promoting the intensification of existing sites or through specific policy provisions?

[52] 'SA of Regional Spatial Strategies and Local Development Documents' (ODPM, November 2005)
[53] 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036
[54] CD&E waste arisings in South London are projected to increase from 523,526 tpa in 2021 to 550,975 tpa in 3036

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

7.4 The key sustainability issues are as follows:

- is the spatial strategy and strategic approach of safeguarding and intensifying existing sites the most appropriate strategy compared to the other reasonable alternatives of:
  - safeguarding existing sites and identifying new sites;
  - safeguarding existing sites and designating preferred industrial areas; or
  - safeguarding existing sites and designating all industrial areas as potential waste sites?
- which existing waste management sites and areas, including those with waste management facilities already in place, other sites allocated in the existing SLWP and industrial areas already identified as potentially suitable for waste facilities, should continue to be safeguarded and therefore carried forward in the new plan?
- which waste sites identified in the existing SLWP have since been developed, permitted and/or allocated for other uses and can no longer contribute towards managing south London's waste?
- how can the waste management capacity of existing waste sites, particularly waste transfer sites, be optimised through the intensification of uses?
- which existing waste management sites and industrial areas identified as potentially suitable for waste facilities have potential for intensification and/or for converting existing waste transfer facilities to waste management operations?
- to what extent can existing waste management facilities, existing site allocations and industrial areas already identified as potentially suitable for waste facilities contribute to meeting the capacity gap over the plan period both with and without the intensification of existing operations?.
- what criteria should be used to evaluate the suitability of any new waste sites, areas suitable for waste facilities or proposals to increase the capacity of existing sites?
  - the nature of the activity, its scale and location;
  - implementation of the waste hierarchy and contribution to the circular economy.
  - achieving a positive carbon outcome[55].
  - potential impacts on local amenity, including noise, odours, air quality and visual.
  - proximity to strategic routes and the impact of vehicle movements on local roads.
  - proximity to sustainable modes of transport.
  - physical and environmental constraints, including flood risk.
  - proximity to residential areas and other sensitive receptors e.g. schools
  - job creation and social benefits, including skills, training and apprenticeships.
  - potential for intensification or co-location with complementary industrial/waste uses.
- is the balance between the four boroughs in terms of waste management capacity appropriate given that Sutton (664,641 tpa) and Merton (213,179 tpa) currently manage a much larger share of household and C&I waste arisings within the plan area than Kingston (35,642 tpa) and Croydon (32,883 tpa)?

[55] the draft new London Plan requires that all energy from waste (EfW) facilities must demonstrate a minimum performance of 400g of CO_2 equivalent per kilowatt hour of electricity produced

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

7.5 The key sustainability issues are as follows:

- can the plan deliver a further shift away from waste disposal (landfill and incineration without energy recovery) towards practices towards the top of the government's waste hierarchy?
- can the plan further encourage minimisation and prevention through the reuse of materials and using fewer resources in the production and distribution of products?
- how can the plan contribute towards the following targets in the draft new London Plan and London Environment Strategy:
  - the equivalent of 100% of south London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
  - zero biodegradable or recyclable waste to landfill by 2026;
  - at least 65% recycling of municipal waste by 2030;
  - 95% reuse/recycling/recovery of construction and demolition waste; and
  - 95% beneficial use of excavation waste

Issue 4: Sustainable Waste Management: Promoting the Circular Economy

7.6 The key sustainability issues are as follows:

- can the plan help to promote a transition to a circular economy within south London that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible?
- how can the potential economic benefits of the plan be maximised in terms of job creation and supporting the local manufacturing sector by achieving resource efficiency, waste reduction and a significant improvement in reuse and recycling performance[56] (reuse, repair, re-manufacturing and materials innovation)?
- how can the plan support the co-location of complementary uses such as secondary material processing facilities in order to support manufacturing from waste?
- can the plan support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets?
- should the plan consider introducing a requirement for all major planning applications to achieve 'net zero-waste' and be supported by a Circular Economy Statement?
- should the plan seek to promote technologies that produce fuels that can be used to power waste management and industrial processes (e.g. biofuels and hydrogen)?

Issue 5: Climate Change Mitigation

7.7 The key sustainability issues are as follows:

- should the policies and proposals of the plan be 'technology neutral' or actively promote the development of energy from waste (EfW) or similar thermal facilities such as anaerobic digestion (AD) in appropriate locations in order to recover low or zero carbon of heat and power from residual[57] waste?

[56] Towards a circular economy, LWARB 2015 and Employment and the circular economy – job creation through resource efficiency in London, LWARB 2015. http://www.lwarb.gov.uk/what-we- do/accelerate-the-move-to-a-circular-economy-in-london/

[57] residual waste is that that which cannot be re-used, recycled or composted

- should the policies and proposals of the plan actively promote opportunities to use residual waste arisings in south London as a renewable source of energy to power complementary waste management or other industrial processes?
- should the policies and proposals of the plan promote the co-location of waste facilities within identified Heat Network Priority Areas or close to existing or planned district heat networks within south London?
- in the context of the current 'climate emergency'[58], should the plan go beyond current London Plan policy requirements to further minimise CO_2 emissions on-site through application of the Mayor's updated energy hierarchy and achieve zero carbon standards through developer contributions to a council-managed carbon offset fund?
- should policy measures be included to minimise embodied energy and the 'carbon footprint' associated with construction materials used for new waste management facilities as measured by the BRE's[59] Building life cycle assessment' methodology.
- to what extent should the plan support the co-location of waste management facilities close to existing energy infrastructure to support EfW technologies?

Issue 6: Climate Change Adaptation

7.8 The key sustainability issues are as follows:

- how can the design and layout of new waste management facilities incorporate green infrastructure and maximise its benefits for a range of adaptation objectives, including flood risk management, urban cooling, mitigation the impact of drought conditions, maintaining biodiversity and habitats and environmental enhancement?
- to what extent can the design and layout of new or upgraded waste management facilities minimise overheating and contribution to the urban heat island (UHI) effect, for example by permeating the development with blue and green spaces and incorporating a range of natural cooling measures as part of the design and layout, including passive design measures (e.g. building orientation), shading, planting and soft landscaping, trees, ponds, SUDS measures and other surface water features?
- should the plan set minimum green infrastructure targets for all new or upgraded waste management facilities and require green roofs wherever feasible? and
- what contribution can the plan make towards the Mayor's long-term target for more than 50% of London to be green by 2050?

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

7.9 The key sustainability issues are as follows:

- what additional policy measures should be included to minimise all sources of flood risk to and from new and existing waste management sites in south London and to reduce flood risks overall, taking climate change into account?
- to what extent can the 'sequential' and 'exceptions tests' be applied to the identification of waste management sites for inclusion in the new plan, taking

[58] in July 2019, the London Borough of Sutton declared a climate emergency and a borough target to achieve net zero carbon by 2030
[59] Building Research Establishment

account of the latest available information on flood risk in south London[60]?

- should the plan include further policy measures to require all waste proposals to incorporate SuDS measures and achieve greenfield run-off rates and volumes?
- how can any residual flood risks arising from waste management sites be safely mitigated through the use of flood resistance or resilience measures where required?
- how can the plan help to ensure that waste facilities and related activities do not adversely affect the quality of watercourses or groundwater within south London?
- how can the plan promote water efficiency measures in existing and new waste facilities having regard to the proximity of vulnerable natural water stores

Issue 8: Sustainable design and construction

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

- should the plan set a minimum BREEAM rating[61] to be met by all new waste management facilities or should this policy requirement take account of the nature of the proposed facility (e.g. sorting and baling facility only, shell buildings or the full-scale redevelopment of a large site)?
- should the plan seek to further minimise environmental life cycle impacts by requiring developers to conducting Life Cycle Assessment and integrating its outcomes in the design decision-making process?
- should the plan include policy criteria to further minimise environmental impacts from construction products[62] ?
- should the plan further encourage responsible sourcing of construction products?
- should the plan include policy measures to increasing the lifespan of the waste-related buildings through designing for durability and adaptability? and
- should the plan include policy criteria to encouraging the reduction of environmental impacts through optimising the use of materials during all stages of the project?

Issue 9: Transport

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

- what further policy measures are needed to minimise HGV movements, traffic congestion, greenhouse gas emissions, local air pollution, noise and vibration associated with waste-related transport within south London?
- to what extent can the plan support sustainable transport objectives by:
  - locating waste management facilities close to where waste is produced?
  - maximising opportunities for the intensification of existing waste sites and industrial areas identified as potentially suitable for waste facilities thus avoiding the need for new waste management sites to be developed and associated trips?
  - co-locating complementary waste management or secondary material processing facilities in line with circular economy principles?
  - promoting the generation of low carbon and renewable energy from waste?

[60] based on the joint strategic flood risk assessment (SFRA) Level 1 and Level 2 reports for Croydon, Merton, Sutton and Wandsworth (AECOM, 2015), the EA's flood map for planning and 'Risk of Flooding from Surface Water (RoFSW)' map
[61] the appropriate scheme is currently the BREEAM New Construction 2018
[62] for example through requiring submission of Environmental Product Declarations (EPD)

- how can the plan minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors such as residential areas, schools and recreation areas?
- is the capacity and condition of the existing local and strategic road network within south London sufficient to accommodate the expected growth in waste-related trips associated with dealing with south London's waste apportionment up to 2036?
- what potential exists for the use of sustainable modes of transport e.g. rail in transporting south London's waste arisings?

Issue 10: Air Quality

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

- how can the policies and proposals of the plan further mitigate the potential impacts of local air pollution arising both from the operation of new and existing waste management facilities and associated transport movements?
- how can the plan contribute towards improving air quality within identified Air Quality Management Areas (AQMAs) and other areas where national standards for particulates (PM10) and nitrogen oxides (NO_x) are currently being breached?
- what further policy requirements should be incorporated as part of the plan to ensure that proposed waste developments within south London are at least 'air quality neutral' based on the emissions benchmarks set out in the Mayor's Sustainable Design and Construction SPG?
- how can the policies and proposals of the plan:
  - avoid creating any new areas that exceed air quality limits, or avoid delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits?
  - avoid creating unacceptable risks of high levels of exposure to poor air quality, particularly for sensitive receptors?
  - promote the use of design solutions, such as green infrastructure and screening, to prevent or minimise increased exposure to existing air pollution?
  - promote an 'air quality positive approach' to waste related developments which maximises benefits to local air quality.
- to what extent can the plan require potentially polluting waste management operations such as the sorting of recyclables to be enclosed?
- what locational criteria should be used for assessing the suitability of sites in terms to the proximity of sensitive receptors (e.g. residential properties, schools and recreation areas) to potential sources of air pollution associated with waste facilities?
- in seeking to mitigate the potential impacts of local air pollution on sensitive receptors, can the plan maintain a 'technology neutral' approach to the development of waste management facilities? and
- to what extent should the plan should allocate broad types of facility to each site e.g. enclosed, open and enclosed with a chimney etc?

Issue 11: Environmental protection

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

- should the plan include policy criteria to mitigate the adverse effects of noise, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?
- what locational criteria should be used to assess the suitability of new waste management facilities in terms of the proximity of sensitive receptors[63] to noise, vibration and odours generated during both the construction and operational phases;
- should the plan set out common requirements in relation to the content of Construction Environmental Management Plans submitted in support of proposals for new waste management facilities across the four partner boroughs?
- how can the plan limit potential pollution associated with the operation of waste management facilities and its potentially adverse impacts on neighbouring uses?
- what further policy measures should be included to reduce the number and total area of contaminated sites within south London requiring remediation? and
- what further policy measures or criteria should be included in the plan to further prioritises the re-use of previously-developed ('brownfield'), derelict or underused land/ premises within south London for waste management uses?

Issue 12: Biodiversity and Habitats

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

- is the plan likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?
- what approach should be followed in screening the plan at the issues and options stage to determine whether or not a Habitats Regulations Assessment (HRA)[64] needs to be carried out?
- which European sites are in sufficiently close proximity to the south London plan area to be considered for the purpose of HRA screening
  - Richmond Park SAC;
  - Wimbledon Common SAC;
  - Mole Gap to Reigate Escarpment SAC; and
  - Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA)?
- how should the plan ensure that new and existing waste management facilities minimise any potential impacts upon regionally or locally designated wildlife sites?
- how will the plan potentially affect local Biodiversity Action Plan (BAP) targets in relation to priority habitats and species within each of the four partner boroughs; and
- how can the waste plan maximise the area of habitat created, improved or managed as a consequence of waste related developments and promote opportunities for enhancing river catchments and local green corridor networks.

[63] 'sensitive receptors' include residential properties, schools, workplaces and recreation areas
[64] also known as 'Appropriate Assessment'

Issue 13: Local Economy and Employment

7.15 The key sustainability issues are as follows:

- how can the plan's effectiveness be maximised in promoting investment, local employment opportunities and the competitiveness of the waste management sector within South London, particularly by promoting the circular economy and new waste management technologies nearer the top of the waste hierarchy?
- in order to ensure that employment land supply matches demand across the four boroughs, and given that most industrial uses[65] have a significantly higher jobs density than waste management uses, should the plan seek to retain employment land for industrial uses within strategic industrial locations (SIL) and established industrial areas, and therefore no longer identify these areas as potentially suitable for waste management uses (provided that sufficient sites can be allocated to meet the apportionment up to 2036)
- how much industrial land and floorspace within the four south London boroughs and across the wider Wandle Valley Property Market Area (including Wandsworth) should be retained or potentially released for waste related uses having regard to (a) the need to maintain a sufficient supply of land and premises to meet current and future demands for industrial (non-waste-related) and related functions; and (b) the borough-level categorisations in Table 6.2 of the London Plan which identifies that Sutton should 'provide capacity' and that the other three boroughs should 'retain capacity' for non-waste related industrial uses.
- to what extent should the plan promote co-ordination initiatives with London Remade and other partners to ensure that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?
- in promoting south London's transition towards a circular economy, how can the plan maximise economic benefits to local communities in the form of new products, employment and low carbon energy for example through managing waste more locally by optimising existing facilities and building new reuse and recovery facilities?
- what is the potential contribution of the plan in promoting south London's economy, facilitating innovation and competitiveness and supporting existing businesses to expand and new business to start-up (particularly SMEs)

Issue 14: Historic Environment, Townscape and Visual Amenity

7.16 The key sustainability issues are as follows**:**

- how can the plan ensure that new and existing waste management facilities do not adversely impact upon the historic environment of the four boroughs – specifically the character, appearance and setting of Conservation Areas; Areas of Special Local Character (ASLCs); listed buildings, historic parks and gardens, scheduled ancient monuments (SAMs) and Archaeological Priority Areas?
- how can the plan ensure that the plan preserves and enhances the quality and distinctiveness of south London's historic environment and cultural assets?

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

- the need to conserve and enhance designated and non-designated heritage assets (including archaeology) and the contribution made by their settings;
- how can the plan avoid increasing the number of heritage assets at risk from neglect, decay or development pressures?
- How can the plan protect areas where there is likely to be a further significant loss or erosion or landscape/townscape character or quality, or where development has had or is likely to have a significant impacts (direct or indirect) upon the historic environment and/or people's enjoyment of it?
- how can the plan avoid adverse effects upon the historic environment arising from traffic congestion, air quality, noise pollution and other issues?
- how can the plan ensure that new and existing waste management facilities are constructed to high quality design principles that respect local character and do not adversely affect local townscape? and
- how can the plan minimise the number of new waste management facilities located within areas of designated landscape value?

Issue 15: Human health and quality of life

7.17 The key sustainability issues are as follows**:**

- how should the plan protect and enhance local amenity and the quality of the townscape for residents living near new and existing waste management facilities?
- how should the plan minimise the potentially adverse impacts of waste related developments, transport and associated activities on public health?
- how can the plan minimise the risk of accidents involving waste vehicles and ensure the safe operation of waste management facilities for employees and visitors
- how can the design and layout of waste management facilities integrate 'designing out crime' principles and contribute to public perceptions of safety
- how can the policies and proposals of the plan help to ensure that new or upgraded waste management facilities within south London promote inclusive designs
- how can the amenity and quality of life of local residents be balanced against the operational requirements of new or upgraded waste management facilities within south London, particularly within areas affected by social deprivation
- is the current level of protection for the permanence, integrity and openness of Green Belt and Metropolitan Open Land (MOL) within the four boroughs sufficient?
- how should the plan minimise the loss of public open space and ensure that there is no increase in the area of public open space deficiency as a consequence of waste related development?
- should the plan include policy criteria to further minimise potential visual intrusion of waste related developments on nationally or locally important landscapes?
- how can the plan tackle waste crime (in 2015, illegal waste activity was estimated to have cost over £600 million in England alone)? and
- how can the plan ensure that waste related developments do not adversely affect strategic views from within and from outside the plan area?

Issue 16: Equalities, Accessibility and Social Inclusion

7.18 The key sustainability issues are as follows**:**

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

8 SUSTAINABILITY APPRAISAL FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN (TASK A4)

Developing Sustainability Objectives, Indicators and Targets

8.1 A comprehensive range of sustainability objectives, indicators and targets has been identified for the purpose of appraising emerging South London Waste Plan (SLWP) options, taking into account other policies, plans, programmes identified in Section 5 (Task A1); the environmental baseline in Section 6 (Task A2); and the key issues identified in Section 7 (Task A3). The proposed SA Framework reflects the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning objectives.

8.2 As shown in Table 8.1, the SA Framework covers 16 broad topic areas arranged under the four categories of (a) sustainable waste management (b) climate change (c) environmental quality, and (d) community well-being.

8.3 The full SA Framework, including sustainability objectives, appraisal questions, indicators and a cross reference to the key issues identified in Section 7, is set out in Table 8.2. It should be noted that the SA Framework will inevitably overlap to some extent with the emerging aims and objectives of the plan itself - particularly in relation to the waste hierarchy and self-sufficiency targets for South London.

Scoring system

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

Figure 8.1: Scoring system for use in the appraisal

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

Plan monitoring

8.5 At the conclusion of the plan-making process, the SA Framework will provide the basis for monitoring the effectiveness of the new SLWP in meeting its objectives over the plan period. As with the current SLWP, the primary mechanism of reporting on plan implementation will be through the annual preparation of Authority Monitoring Reports prepared by the four boroughs.

Table 8.1: Summary of the proposed SA Framework

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

SUSTAINABILITY APPRAISAL FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN

SA Objective	Appraisal Questions	Indicators	Issue Ref
(A) SUSTAINABLE WASTE MANAGEMENT			
Objective 1: Net self-sufficiency To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period	➢ ***Will the policy or proposal help to provide sufficient sites and waste management facilities in south London to meet the combined apportionment targets[66] for household and commercial & industrial (C&I) waste over the plan period?*** ➢ ***Will the policy or proposal help to provide sufficient sites and waste facilities to manage other waste arisings, including construction, demolition & excavation (CD&E) waste and hazardous waste, over the plan period?*** ➢ ***Will the policy or proposal reduce waste arisings needing to be managed by promoting waste reduction, reuse and manufacturing from waste?*** ➢ ***Will the policy or proposal reduce the proportion of recyclable waste exported outside the plan area?***	➢ current and future household, C&I, CD&E and hazardous waste arisings in south London over the plan period (tpa) ➢ number, site area (ha) and capacity (tpa) of new and existing waste management facilities within south London by facility type and waste stream. ➢ combined tonnage of household and C&I waste managed within south London as a proportion of total arisings and the London Plan apportionment (tpa) (%) ➢ tonnage of other waste streams managed as a proportion of arisings, including CD&E and hazardous waste (%). ➢ number of allocated and windfall sites developed for new waste management facilities, intensification of uses or for manufacturing from waste respectively (ha) ➢ tonnage of waste recyclable waste exported outside the plan area (tpa)	Section 7, Page 75
Objective 2: Spatial strategy and strategic approach To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land	➢ ***Will the policy or proposal help to optimise and intensify the capacity of waste management sites and other industrial uses within south London compared to reasonable alternatives?*** ➢ ***Will the policy or proposal facilitate linked trips and optimise the location of new waste management facilities with respect to proximity to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors?*** ➢ ***Will the policy or proposal optimise the distribution of waste management sites within south London?***	➢ number of sites and area of employment land intensified for waste management uses, complementary uses such as manufacturing from waste or other industrial uses (ha) ➢ increased tonnage of waste managed on intensified waste management sites by waste stream (LACW, C&I and CD&E) and in total (tpa) ➢ number and area of existing waste transfer sites converted to waste management operations (ha) ➢ proximity of new or upgraded waste management to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors (m)	Section 7, Page 76

[66] the draft new London Plan 2017 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 3: Waste re-use, recycling and recovery To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery	➢ ***Will the policy or proposal help to deliver a shift away from waste disposal towards practices towards the top of the government's waste hierarchy?*** ***(i) Prevention;*** ***(ii) Preparing for Re-Use;*** ***(iii) Recycling;*** ***(iv) Recovery;*** ***(v) Disposal***. 	➢ tonnage and proportion of south London's waste arisings respectively prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➢ number and proportion of waste developments achieving a shift away from waste disposal towards practices towards the top of the government's waste hierarchy ➢ tonnage and proportion of biodegradable or recyclable waste sent to landfill (tpa) (%) ➢ tonnage and proportion of household and C&I waste recycled (tpa) (%) ➢ tonnage and proportion of CD&E waste re-used, recycled or recovered (tpa) (%) ➢ proportion of excavation waste put to beneficial uses (%) ➢ performance against the following revised targets for re-use, recycling and recovery in the new London Plan - the equivalent of 100% of south London's waste is managed within the plan area by 2026 for all waste streams except excavation waste; - zero biodegradable or recyclable waste to landfill by 2026; - at least 65% recycling of municipal waste by 2030; - 95% reuse/recycling/recovery of construction and demolition waste; and - 95% beneficial use of excavation waste	Section 7, Page 77

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 4: Circular economy To promote a transition to a circular economy within south London	➢ ***Will the policy or proposal promote the circular economy within south London?*** ➢ ***Will the policy or proposal improve efficiency and innovation to keep products and materials at their highest use for as long as possible?*** ➢ ***Will the policy or proposal support manufacturing from waste and the co-location of complementary uses in industrial areas such as secondary material processing facilities?*** ➢ ***Will the policy or proposal promote technologies that produce fuels that can be used to power waste management and industrial processes?*** ➢ ***Will the policy or proposal ensure that any energy from waste (EfW) facilities meet and exceed the Mayor's carbon intensity floor target?***	➢ number and proportion of planning applications for waste management facilities supported by a Circular Economy Statement ➢ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➢ number and capacity of manufacturing from waste facilities developed within south London (tpa) ➢ number and capacity of waste facilities developed producing fuels that can be used to power waste management and industrial processes (tpa)	Section 7, Page 77
(B) CLIMATE CHANGE			
Objective 5: Climate Change Mitigation To address the causes of climate change by minimising CO_2 emissions from waste facilities	➢ ***Will the policy or proposal promote the co-location of energy from waste (EfW) facilities within Heat Network Priority Areas or close to existing or planned district heat networks in south London?*** ➢ ***Will the policy or proposal further promote the use of residual waste arisings with south London as a renewable energy source to power complementary waste management or other industrial processes?*** ➢ ***Will the policy or proposal promote technologies producing fuels that can be used to power waste management and industrial processes?*** ➢ ***Will the policy or proposal minimise embodied energy and the 'carbon footprint' associated with construction materials used for new or upgraded waste management facilities?***	➢ net carbon dioxide (CO_2) reductions delivered by waste management facilities (tpa) ➢ number and capacity of waste management facilities promoting the use of residual waste arisings as a renewable source of energy to power complementary waste management or other industrial processes ➢ number and proportion of waste facilities (a) achieving BREEAM 'Excellent'; and (b) minimising embodied energy under the BRE's Building life cycle assessment' methodology	Section 7, Page 77

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 6: Climate Change Adaptation To ensure that all waste management facilities are fully adapted to the impacts of climate change	➢ ***Will the policy or proposal help to ensure that new or upgraded waste management facilities incorporate green infrastructure and maximise its benefits for flood risk management, urban cooling, resilience to drought, biodiversity and other climate adaptation objectives?***	➢ number and proportion of new or upgraded waste management facilities achieving the Mayor's minimum Urban Greening Factor (UGF)[67] score of 0.3 according to Policy G5 and Table 8.2 of the draft new London Plan. ➢ proportion of new or upgraded waste management facilities incorporating a green roof and achieving at least a 10% increase in green coverage compared to baseline conditions prior to development. ➢ number and proportion of new or upgraded waste management facilities complying with the Mayor's sustainable design and construction SPG as amended.	Section 7, Page 78
Objective 7: Flood risk and sustainable drainage (SuDS) To avoid, reduce and manage flood risk to or from waste management facilities	➢ ***Will the policy or proposal help to avoid inappropriate development in flood risk areas?*** ➢ ***Will the policy or proposal ensure that the design and layout of the waste management sites preserves the ecological functioning of river corridors, enhance local amenity and avoid any net loss of floodplain storage?*** ➢ ***Will the policy or proposal minimise surface water run-off from new waste management facilities by incorporating sustainable urban drainage systems (SUDS), managing run-off as close to its source as possible and aiming to achieve greenfield run-off rates?***	➢ number and proportion of new or upgraded waste management facilities located within Environment Agency (EA) flood zones 2, 3a and 3b. ➢ number and proportion of new or upgraded waste management facilities located within areas at higher risk of surface water flooding according to the EA's 'Risk of Flooding from Surface Water (RoFSW)' map. ➢ number and proportion of new or upgraded waste management facilities incorporating SuDS measures. ➢ number and proportion of new or upgraded waste management facilities achieving greenfield run-off rates[68] ➢ number and proportion of new or upgraded waste management facilities incorporating flood resistance or resilience measures in line with Government guidance and EA Standing Advice.	Section 7, Page 78

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

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

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 8: Sustainable Design and Construction To promote the highest standards of sustainable design and construction in new waste management facilities	➢ ***Will the policy or proposal help to promote the highest standards of sustainable design and construction in new waste management facilities***? ➢ ***Will the policy or proposal help to minimise environmental life cycle impacts by requiring developers to conduct Life Cycle Assessments as part of the design process*** ➢ ***Will the policy or proposal promote the use of responsibly sourced construction materials[69] with lower environmental impact?***	➢ number and proportion of new or upgraded waste management facilities achieving an 'Excellent' or 'Very Good' rating under the appropriate BREEAM scheme[70] ➢ number and proportion of new or upgraded waste management facilities subjected to Life Cycle Assessment as part of the design process? ➢ number and proportion of new or upgraded waste management facilities promoting the use of responsibly sourced construction materials with lower environmental impact	Section 7, Page 79
(C) ENVIRONMENTAL QUALITY			
Objective 9: Transport To reduce trips, traffic congestion and pollution arising from waste-related transport movements	➢ ***Will the policy or proposal help to minimise trips, traffic congestion and pollution arising from waste-related transport movements?*** ➢ ***Will the policy or proposal minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors such as residential areas, schools and recreation areas by safeguarding and locating new waste management facilities close to the strategic road network?***	➢ ***traffic flows on the strategic road network and local roads by vehicle type based on Department for Transport (DfT) and Transport for London (TfL) data (vehicle-km per annum)*** ➢ ***number of new or upgraded waste management facilities located in close proximity to the strategic road network (i.e. within 400m)*** ➢ ***number of new or upgraded waste management facilities located in close proximity to sensitive receptors such as residential areas, schools and recreation areas (i.e. within 400m)*** ➢ ***number of waste sites intensified thus avoiding the need for new sites to developed and associated trips*** ➢ ***number and capacity of complementary uses introduced on waste sites, such as manufacturing from waste, with potential to enable 'linked trips'***	Section 7, Page 79

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

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 10: Air Quality To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	➢ ***Will the policy or proposal help to minimise or reduce local air pollution from new or upgraded waste management sites and associated transport movements?*** ➢ ***Will the policy or proposal contribute towards meeting national air quality objectives for nitrogen dioxide (NO2), particulates (PM10) and ozone and avoid any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'?*** ➢ ***Will the policy or proposal help to promote design solutions such as green infrastructure and screening, in order to prevent or minimise increased exposure to air pollution?***	➢ NO_2 (nitrogen dioxide) levels in µg/m^3 (Target: 200 µg/m^3 as a 1-hour mean no more than 18 days per year) ➢ PM10[71] levels in µg/m^3 (Target: 50 µg/m^3 as a 24-hr mean no more than 35 days/year; not to exceed 40 µg/m^3 as annual mean) ➢ ozone levels in µg/m^3 as an 8-hour mean (Target: No more than 100 µg/m^3 as an 8 hour mean more than 10 times a year) ➢ number and proportion of new or upgraded waste management developments located within AQMAs or within Air Quality Focus Areas ➢ the number and proportion of new or upgraded waste management facilities achieving 'Air Quality Neutral' standards as defined by the Mayor[72]	Section 7, Page 80
Objective 11: Environmental protection To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases	➢ ***Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities on noise pollution, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?*** ➢ ***Will the policy or proposal help to minimise water pollution from surface water runoff?*** ➢ ***Will the policy or proposal help to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment?***	➢ the number and proportion of new or upgraded waste management facilities located adjacent to residential uses and other sensitive land-uses ➢ the number and proportion of new or upgraded waste management facilities which are enclosed or screened ➢ the number of new or upgraded waste management facilities accompanied by Construction Environmental Management Plans ➢ the number of new or upgraded waste management facilities incorporating the principles of 'water sensitive urban design' as part of the site drainage/SuDS strategy ➢ the number and area of contaminated industrial sites remediated as a consequence of the development of new or upgraded waste management facilities (ha)	Section 7, Page 80

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

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 12: Biodiversity and Habitats To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive	➢ ***Is the policy or proposal likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the EU Habitats Directive and the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?*** ➢ ***Will the policy or proposal help to minimise any potential impacts upon regionally or locally designated wildlife sites within the plan area?*** ➢ ***Will the policy or proposal ensure that there is no net loss in biodiversity value and incorporate opportunities to enhance biodiversity wherever possible as part of the development of new or upgraded waste management facilities?***	➢ modelled increase in air pollution arising from the operation of new and existing waste management facilities in south London, associated transport movements and potential adverse impacts on sensitive habitats or species on relevant European sites[73]: - Richmond Park SAC; - Wimbledon Common SAC; - Mole Gap to Reigate Escarpment SAC; and - Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA). ➢ the number of new or upgraded waste management facilities located within or adjacent to regionally or locally designated wildlife sites, including Sites of Interest for Nature Conservation (SINCs), local nature reserves (LNRs); and green corridors ➢ change in biodiversity value arising from the development of new or upgraded waste management facilities based on an appropriate metric such as the DEFRA biodiversity offsetting metric[74] ➢ change in priority habitats and population of Biodiversity Action Plan (BAP) species within each of the four boroughs	Section 7, Page 81

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

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

SA Objective	Appraisal Questions	Indicators	Issue Ref
(D) ENVIRONMENTAL QUALITY			
Objective 13: Local Economy and Employment To promote local employment opportunities, and the competitiveness of the waste management sector within South London	➢ ***Will the policy or proposal promote investment, local employment opportunities and the competitiveness of the waste management sector?*** ➢ ***Will the policy or proposal contribute to the growth of the circular economy within south London?*** ➢ ***Will the policy or proposal help to ensure that employment land supply matches projected demand over the plan period in each of the four partner boroughs and for the plan area as a whole?*** ➢ ***Will the policy or proposal help to maintain a sufficient supply of land and premises to meet current and future demands for industrial uses within the four south London boroughs and across the wider Wandle Valley Property Market Area*** [75] ➢ ***Will the policy or proposal help to that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?***	➢ number of people employed in the Circular Economy within south London and by borough ➢ number of green businesses by size and proportion surviving 1 year ➢ growth in the low carbon and environmental goods and services sector within south London ➢ projected supply and demand for employment land (for non waste-related uses) by borough over the plan period[76] ➢ vacancy rates within SILs and established industrial areas ➢ number of sites and total area of employment land within SILs and established industrial areas intensified for waste management and/or for other industrial uses ➢ area of employment land optimised for waste management and complementary manufacturing from waste uses ➢ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➢ number and capacity of manufacturing from waste facilities developed within south London (tpa)	Section 7, Page 81
Objective 14: Historic Environment, Townscape and Visual Amenity To avoid the adverse impacts of waste facilities on townscape quality and visual amenity by promoting high standards of design and layout	➢ ***Will the policy or proposal avoid all potential adverse impacts on the quality and distinctiveness of south London's historic environment and cultural assets,*** ➢ ***Will the policy or proposal ensure that new or upgraded waste management facilities are built to high quality design principles that respect local character and do not adversely affect townscape?***	➢ the number and proportion of new or upgraded waste management facilities constructed to high quality design principles ➢ adverse impacts on the setting of scheduled monuments, historic parks and gardens and other heritage or cultural assets in south London	Section 7, Page 82

[75] the Wandle Valley Property Market Area defined in the draft new London Plan includes Wandsworth as well as Croydon, Kingston,, Merton and Sutton

[76] based on the London Industrial Land Demand Study, prepared by CAG Consultants on behalf of the Mayor in 2017), Table 6.2 of the draft New London Plan categorises Croydon, Kingston and Merton as needing to 'retain capacity' for employment land, whereas Sutton is categorised as needing to 'provide capacity'

SA Objective	Appraisal Questions	Indicators	Issue Ref
Objective 15: Human Health and Quality of Life To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment	➢ ***Will the policy or proposal protect and enhance local amenity and quality of life for residents living near new and existing waste management facilities, particularly within areas affected by social deprivation?*** ➢ ***Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities and associated transport movements, on public health?*** ➢ ***Will the policy or proposal help to reduce the incidence of waste-related crime and contribute to public perceptions of safety?*** ➢ ***Will the policy or proposal maintain the current level of protection for Green Belt and Metropolitan Open Land (MOL) and public open space***	➢ levels of social deprivation in residential areas adjacent to waste management sites and the strategic road network within south London as measures by the Government's Index of Multiple Deprivation (IMD) and the relevant domains relating to employment, health, crime and living environment ➢ monitored levels of nitrogen dioxide (NO_2), particulates (PM10) and ozone against national air quality objectives (see above) ➢ levels of 'health and disability' deprivation in residential areas adjacent to waste management sites (see above) ➢ environmental crime rate per 1,000 population ➢ area of Green Belt, MOL and public open space and area lost to waste management development	Section 7, Page 83
Objective 16: Equalities, Accessibility and Social Inclusion To reduce exclusion, address inequalities & accessibility for all equalities target groups	➢ ***Will the policy or proposal ensure that new waste management facilities are accessible and inclusive for all equalities target groups?*** ➢ ***Will the policy or proposal further promote social inclusion by addressing potential inequalities arising from current waste management arrangements in south London?*** ➢ ***Will the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?*** ➢ ***Will the policy or proposal maximize potential benefits to local communities*** in the form of new products, employment and low carbon energy by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?	➢ new or upgraded waste management facilities within south London are accessible and inclusive for all equalities target groups ➢ number and location of reuse and recycling centres within south London accepting household waste ➢ proportion of the urban area within south London within 2 km of reuse and recycling centres ➢ location and concentration of existing and new waste facilities within South London relative to areas of relative social deprivation ➢ number of individuals, residents' groups, special interest groups, business organisations, public bodies and neighbouring waste planning authorities consulted as part of the preparation of the new plan	Section 7, Page 83

9 IDENTIFYING AND ASSESSING WASTE MANAGEMENT SITES

Review of existing waste management capacity (see also Section 3)

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

9.2 Using the relevant apportionment criteria set out in the London Plan, the capacity review included the following types of waste management facility:

- **Used in London for energy recovery:** Energy recovery facility, energy from waste facility, anaerobic digestion;
- **Materials sorted or bulked in London facilities for reuse, reprocessing or recycling:** Materials Recycling Facility (MRF) or other materials sorting facility, transfer stations;
- **Material reused, recycled or reprocessed in London**: Material reprocessor, reuse facility, composting facility (permitted and exempt), anaerobic digestion facility; and
- **Produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition[77] as a minimum:** RDF or SRF production facilities (if Renewable Obligation Order requirements are met).

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

9.4 Full details of the review are set out in the South London Waste Technical Paper (Anthesis, 2019) in terms of:

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

9.5 A summary of the main findings is provided in Section 3 of this SA report[78]. The main conclusion reached by the consultants was that the waste sites identified as suitable for intensification and development represent sufficient opportunity to meet the capacity gaps for household, C&I and C&D waste streams. If all potential new capacity identified were to be brought forward, there would be surplus capacity for the management of household,

[77] refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns. The written contract must include the end-user's technical specifications relating as a minimum to the calorific value, the moisture content, the form and quantity of the RDF.
[78] see comparison of capacity gaps and potential new capacity in Table 3.8, page 21 of Section 3

C&I and C&D waste streams throughout the plan period from 2021 to 2036. Although this surplus is forecast to decrease over the plan period, there is considered to be some flexibility in bringing the identified capacity forward. As sufficient opportunities can be identified to meet South London's capacity gap for household, C&I (apportioned waste) and C&D waste streams, it will therefore not be necessary for the updated SLWP to identify any new areas for new waste facilities within the four boroughs.

Existing waste management sites proposed to be safeguarded

9.6 Existing waste management sites within south London which are proposed to be carried forward and safeguarded in the new plan are listed below in Table 9.1 (see draft Policy WP1 of the Issues and Preferred Options document). The future impacts arising from the construction, intensification and operation of each of these sites on the full range of environmental, social and economic objectives making up the SA Framework have therefore been subject to appraisal using the matrix in Section 12 of this document.

Table 9.1: Existing waste management sites proposed to be safeguarded

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
Croydon				
C1	Able Waste Services	0	43,268	
C2	Croydon Car Spares	241	0	
C3	Curley Skip Hire	0	0	
C4	Days Aggregates Purley Depot	0	0	
C5	Factory Lane Waste Transfer Station	9,623	5,206	Yes
C6	Fishers Farm Reuse & Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Materials	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Civic Amenity Site	6,684	0	
C11	Safety Kleen	0	0	Yes
C12	Stubbs Mead Depot	0	0	Yes
CEX	Exempt Sites	7,580	0	
Kingston				
K1	Chessington Equestrian Centre	0	0	
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Civic Amenity Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
Merton Capacity				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M4	Garth Road Civic Amenity Site	9,866	0	
M5	Garth Road Transfer Station	15,704	0	

Ref	Name	Household/C&I (tpa)	C&D (tpa)	Potential for Intensification
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management (Willow Lane)	0	33,845	
M9	Maguire Skips (Wandle Way)	0	0	
M10	Maguire Skips (Weir Court)	0	42,856	
M11	Morden Transfer Station	0	0	
M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	Yes
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites[79]	6,000	0	Yes
Sutton Capacity				
S1	777 Recycling Centre	20,625	32,972	Yes
S2	Beddington Farmlands ERF	275,000	0	
S3	Cannon Hygiene	0	0	Yes
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Civic Amenity Site	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Country Waste Skip Hire	305,000	0	
SEX	Exempt Sites	500	0	

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

9.7 Based on the consultants' review of available waste management capacity against updated London Plan apportionment targets, the Issues and Preferred Options document proposes that the broad industrial areas previously identified as suitable for waste facilities in Schedule 2 of the current SLWP 2012 should no longer be safeguarded in the new plan and that no new waste sites within these areas (or elsewhere) should be permitted unless this is for compensatory provision

9.8 These areas are listed below in Table 9.2.

[79] including M3: Deadman Confidential

Table 9.2: Industrial areas previously identified as suitable but not carried forward

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

Site profiles and planning constraints

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

9.10 The following site assessment criteria and planning constraints can be directly related to one or more of the sustainability objectives making up the SA Framework:

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

9.11 Table 9.3 shows how each of the above site assessment criteria impact upon the various SA Framework objectives.

Sustainability appraisal of waste management sites proposed to be safeguarded

9.12 The impacts of each of the existing or potential waste management sites identified in the Issues and Preferred Options document has been appraised, where relevant, against each of the sustainability objectives making up the SA Framework, drawing upon the detailed site profiling work undertaken by the consultants. The outcome of the appraisal for each of the proposed sites are set out in Section 12.

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

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

Table 9.3 Relationship of waste site profiling criteria with SA Framework objectives

Waste Site Profiling Criteria	Related SA Framework Objective
Type of facility	(1) Net self-sufficiency (2) Spatial strategy and strategic approach (3) Waste re-use, recycling and recovery (4) Circular economy
Max throughput	(1) Net self-sufficiency (4) Circular economy. (13) Local economy and employment
Licensed capacity	(1) Net self-sufficiency. (3) Waste re-use, recycling and recovery (4) Circular economy. (13) Local economy and employment
Management type	(1) Net self-sufficiency. (3) Waste re-use, recycling and recovery (4) Circular economy.
Access, congestion and road capacity	(5) Climate change mitigation (9) Transport (10) Air Quality (11) Environmental protection (12) Biodiversity and habitats (15) Human health and quality of life (16) Equalities, accessibility and social inclusion
Opportunity to use rail or waste to transport waste	(9) Transport (10) Air Quality (11) Environmental protection (15) Human health and quality of life
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	(9) Transport (10) Air Quality (11) Environmental protection (13) Local economy and employment (14) Historic environment, townscape and visual amenity. (15) Human health and quality of life (16) Equalities, accessibility and social inclusion

Waste Site Profiling Criteria	Related SA Framework Objective
Opportunity to intensify or upgrade operation	(1) Net self-sufficiency. (2) Spatial strategy and strategic approach. (3) Waste re-use, recycling and recovery (4) Circular economy (5) Climate change mitigation (6) Climate change adaptation 7) Flood risk and sustainable drainage (SuDS) (8) Sustainable design and construction (9) Transport (10) Air Quality (11) Environmental protection (12) Biodiversity and habitats (13) Local economy and employment (14) Historic environment, townscape and visual amenity. (15) Human health and quality of life (16) Equalities, accessibility and social inclusion
Other designations	(11) Environmental protection (12) Biodiversity and habitats (14) Historic environment, townscape and visual amenity
Air Quality Focus Area	(9) Transport (10) Air Quality (11) Environmental protection (15) Human health and quality of life (16) Equalities, accessibility and social inclusion
Greenbelt / MOL	(12) Biodiversity and habitats (13) Local economy and employment (15) Human health and quality of life (16) Equalities, accessibility and social inclusion
Flood Affected	(6) Climate change adaptation: (7) Flood risk and sustainable drainage (SuDS)
Heritage assets	(14) Historic environment, townscape and visual amenity (15) Human health and quality of life
Proximity to environment designations	As appropriate

10 DEVELOPING PREFERRED SOUTH LONDON WASTE PLAN POLICIES (TASK A5)

Developing draft policies (preferred option)

10.1 Based on initial evidence gathering on existing and future waste management capacity in south London against the new apportionment, specific policy recommendations contained in the Technical Paper (Anthesis, June 2019) and the outcome of the scoping stage, the following draft polices (WP1-WP8) have been developed by the partner boroughs to guide proposed waste developments over the plan period from 2021 to 2036.

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

Strategic alternatives for the purpose of appraisal

10.2 Four strategic alternatives have been identified for the purpose of the appraisal. Draft Policies WP1-WP8 together constitute the '**Preferred Option' (Option 1)**. **Option 2a** would carry forward the existing policies and designations in the current plan unchanged and **Option 2b** would seek to identify new waste sites in addition ton existing safeguarded sires. **Option 3** ('do-nothing') considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

10.3 While in many respects draft Policies WP1-WP8 (Option 1) carry forward and build upon the policies in the existing plan, there are number of important differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation. As can be seen from the results of the appraisal, these are likely to have significant beneficial impacts by comparison with the existing plan.

10.4 Each of the draft policies and strategic alternatives (Options 1-3) are set out below.

Policy WP1: Strategic approach to municipal solid waste and C&I waste

OPTION 1: SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT)
(a) The boroughs of the slwp will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
(b) During the lifetime of the plan, the boroughs of the 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 & ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT) Carry forward Policy WP1 from existing SLWP 2012
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing SLWP policies to expire in 2021

Policy WP2: Strategic approach to other forms of waste

OPTION 1: SAFEGUARD EXISTING SITES ONLY (ONLY ALLOW PROPOSALS FOR ADDITIONAL C&D CAPACITY WHERE FOR COMPENSATORY PROVISION) (a) Development that results in the intensification of existing sites to provide additional C&D 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 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.
OPTION 3: 'DO-NOTHING' SCENARIO Allow existing SLWP policies to expire in 2021

Policy WP3: Existing waste sites

OPTION 1: PREFERRED POLICY (a) The sites set out on Pages 42-90 of this SLWP 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. Safeguarding Waste Hierarchy (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
OPTION 3: 'DO-NOTHING' SCENARIO

Policy WP4: Sites for compensatory provision

OPTION 1: PREFERRED POLICY new waste sites to provide compensatory provision should: **(a)** Demonstrate that the site is capable of providing sufficient compensatory capacity. **(b)** Be located on sites: (i) within Strategic Industrial Locations or Locally Significant Industrial Locations; (ii) not having an adverse effect on nature conservation areas protected by international

or national regulations; (ii) 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 which will 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

OPTION 3: 'DO-NOTHING' SCENARIO

Policy WP5: Protecting and enhancing amenity

OPTION 1: PREFERRED POLICY

(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.
(b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.
(c) Particular regard will be paid to:
(i) The Green Belt, Metropolitan Open Land, recreation land or similar;
(ii) Biodiversity, including nature conservation areas protected by international and national regulations as well as regional and local nature conservation;
(iii) Archaeological sites, the historic environment and sensitive receptors, e.g.schools, hospitals and residential areas;
(iv) Groundwater, surface water etc;
(v) Air emissions, including dust, arising from the on-site operations, plant and traffic ;
(vi) Noise and vibration etc;
(vii) Traffic generation, access and the suitability of the highway network, including access to and from strategic road network;
(vii) Odour, litter, vermin and birds; and,
(ix) The design of the facility, particularly:

- Complementing/ improving local character;
- limiting visual impact by employing hard and soft landscaping and minimising glare;
- being of a scale, massing or height appropriate to townscape or landscape;
- using good quality materials;
- minimising exterior lighting; and,
- utilising high-quality boundary treatments.

OPTION 2: CARRY FORWARD POLICY WP7 FROM SLWP 2012

OPTION 3: 'DO-NOTHING' SCENARIO

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. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with the South London Waste Plan and any other relevant policies of the relevant borough's Development Plan. **(b)** Waste facilities will be required to: (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 in accordance with the Draft London Plan Policy GG6 , particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with Draft London Plan Policy G5; (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials; (v) minimise waste and promote sustainable management of construction wastes on site; and, (vi) protect, manage and enhance local habitats and biodiversity.
OPTION 2: CARRY FORWARD POLICY WP6 FROM SLWP 2012
OPTION 3: 'DO-NOTHING' SCENARIO

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
OPTION 3: 'DO-NOTHING' SCENARIO

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

11 COMPATABILITY OF THE VISION AND OBJECTIVES AGAINST THE SA FRAMEWORK OBJECTIVES

Background

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

Draft Vision

11.2 The Issues and Preferred Options document sets out the following draft Vision.

DRAFT VISION

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient in terms of waste generation and waste management for all types of waste. In addition, the South London Waste Plan area will be playing its part in managing London's Household and Commercial and Industrial Waste within the capital's boundaries.

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

Draft objectives

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

DRAFT OBJECTIVES

- **Meet the Draft London Plan target for Household and Commercial & Industrial Waste.**
- **Meet the identified needs for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.**
- **Safeguard existing waste sites to meet these targets and needs on existing sites.**
- **Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates.**
- **Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.**
- **Ensure the effects of new development are mitigated and, where possible, enhance amenity.**

Compatibility analysis

11.4 The Compatibility Matrix in Table 11.1 presents the outcome of testing the draft Vision and each of the six proposed objectives against the 16 key Sustainability Appraisal objectives making up the SA Framework

Table 11.1: Compatibility Matrix

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
KEY √√ Compatible & Synergistic √ Compatible objectives X Incompatible ? Potential Conflict No interaction	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the most efficient use of industrial land.	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
DRAFT VISION																
By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient in terms of waste generation and waste management for all types of waste. In addition, the South London Waste Plan area will be playing its part in managing London's Household and Commercial and Industrial Waste within the capital's boundaries. **The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated as far as it is possible to do so. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates.**	√√	√√	√	√	√	√	√	√√	√√	√√	√	√	√√	√	√√	√√
DRAFT OBJECTIVES																
Meet the Draft London Plan target for Household and C&I Waste.	√√	√√	√√	√					√	√	√		√		√	√
Meet the identified needs for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.	√√	√√	√√	√√	√√	√√	√√	√	√	√	√√	√	√	√	√	√
Safeguard existing waste sites to meet these targets and needs on existing sites.	√√	√√	√	√	√				√√	√√	√	√	√√	√	√√	√√
Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates.		√√									√		√√	√	√	√√
Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.		√	√	√	√√	√√	√√	√√	√	√√	√√	√√	√	√√	√√	√√
Ensure the effects of new development are mitigated and, where possible, enhance amenity		√	√	√	√√	√√	√√	√√	√	√√	√√	√√	√	√√	√√	√√

12 APPRAISAL OF DRAFT POLICIES AND PROPOSED WASTE MANAGEMENT SITES

Appraisal Methodology

12.1 The SA Matrix in Table 12.1 sets out the results of appraisal for each of the draft policies (WP1-WP8) set out in SLWP Issues and Options document (Part A) and for all of the sites proposed to be safeguarded for waste management uses (C1-C12, K1-K4, M1-M18 and S1-S12) (Part B).

12.2 As discussed earlier in Section 10, four strategic alternatives have been identified for the purpose of the appraisal. Draft Policies WP1-WP8 together constitute the '**Preferred Option' (Option 1)** and would safeguard existing waste sites only for the purpose iof meeting but not exceeding the London Plan apportionment. **Option 2a** would seek to exceed the apportionment by safeguarding existing waste sites together with all industrial areas previously identified in the current SLWP 2012 (i.e. business as usual). **Option 2b** would seek to identify new waste sites in addition to existing safeguarded sites. **Option 3** ('do-nothing') considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced. The matrix enables the likely social, economic and environmental impacts of these three strategic alternatives to be compared.

12.3 The appraisal of sites draws substantially upon the detailed site profiling work undertaken by Anthesis consultants on behalf of the four boroughs and reported in the South London Waste Technical Paper and accompanying Appendices (Anthesis, June 2019). The approach to the appraisal of potential waste management sites is set out in Section 9, which includes an analysis of how the consultants' site profile criteria relate to each of the SA Framework objectives (Table 9.3).

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

12.5 The finalised scoring system is repeated in Figure 12.1 below.

Figure 12.1: Scoring system for use in the appraisal

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

SUSTAINABILITY APPRAISAL MATRIX

Part A: Draft Policies

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
POLICY WP1: STRATEGIC APPROACH TO MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE																
OPTION 1: SAFEGUARD EXISTING SITES ONLY (PREFERRED POLICY) (a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the Draft London Plan apportionment target of managing 929,750 tonnes of HIC 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 not permitted, unless they are for compensatory provision (see Policy WP3).	+++	+++	++	++	++	++	++	++	+++	+++	++	++	+++	++	++	++
OPTION 2A: SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward existing policy to *exceed* rather than meet apportionment by safeguarding existing sites and all industrial areas	+++	+	+	+	+	x	X	x	x	x	x	x	+	x	x	x
OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES Aim to *exceed* rather than meet the apportionment by safeguarding existing sites and identifying new waste sites	+++?	+?	+?	+?	+?	x?	x?	x?	x?	x?	x?	x?	+?	x?	x?	x?
OPTION 3: DO-NOTHING This option would involve not replacing the current SLWP 2012 and allowing it to expire in 2021	xx?	xx?	x	x	x	x?	X	x	xx?	xx?	xx?	xx?	x	xx?	xx?	xx?

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

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE																
OPTION 1: PREFERRED POLICY (a) Development that results in the intensification of existing sites to provide additional C&D 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 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.	+++	+	+	+	+	x	X	x	x	x	x	x	+	x	x	x
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.	+++?	+?	+?	+?	+?	x?	x?	x?	x?	x?	x?	x?	+?	x?	x?	x?
OPTION 3: DO-NOTHING This option would involve not replacing the current SLWP 2012 and allowing it to expire in 2021	xx?	xx?	x	x	x	x?	X	x	xx?	xx?	xx?	xx?	x	xx?	xx?	xx?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the most efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Preferred Policy WP2 'Strategic Approach to Other Forms of Waste'** is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by ensuring that any proposals providing for additional construction and demolition waste capacity (either transfer or management) within South London are delivered only through the intensification of existing sites unless this is for compensatory provision. This will promote the efficient use of employment land and avoid the need to identify additional sites for the management of other forms of waste. (9) Promoting **sustainable transport** objectives within South London by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&D), radioactive, agricultural or hazardous waste streams. (10) Minimising **air pollution** and potential impacts on sensitive land-uses, again by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&D), radioactive, agricultural or hazardous waste streams'. This will be achieved by optimising the capacity of existing C&D waste management facilities, for example through the intensification of existing sites and by providing incentives to operators to manage greater volumes of C&D closer to their licensed capacities (11) Protecting **the quality of South London's environment** by opposing the development of new facilities for the management of radioactive, agricultural or hazardous waste streams; avoiding additional HGV movements and associated environmental impacts (see above); ensuring that additional C&D waste capacity (either transfer or management) can only be delivered through the intensification and therefore improvement of existing sites; ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed; and implementing environmental enhancements at the Hogsmill and Beddington Sewage Treatment Works respectively. MEDIUM BENEFICIAL IMPACTS (++) FOR: (1) Promoting **net self-sufficiency** within South London by ensuring that sufficient sites and waste management facilities are retained to manage all forecast C&D waste arisings within the four boroughs up to 2036. While the South London Waste Technical Paper (Antithesis, 2019) identifies that there is currently a shortfall in capacity of 172,698 tonnes per annum compared to forecast arisings of 414,380 tpa in 2036, evidence is provided to show that this can easily be provided on existing safeguarded sites without the need to designate additional sites or 'broad areas' for the management of C&D waste (i.e. existing sites are currently operating well below the licensed capacity for this waste stream). Sufficient capacity already exists to deal with current and future radioactive, agricultural and hazardous waste arisings within south London to 2036. (5) **Minimising CO_2 emissions** from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices; and promoting the use of residual waste arisings as a renewable source of energy to power complementary waste management or other industrial processes. The proposed replacement of the combined heat and power (CHP) plant at the Hogsmill Sewage Treatment Works is expected to deliver a net reduction in CO_2 emissions. It should also be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP. SMALLER BENEFICIAL IMPACTS (+) FOR: (3) Promoting **waste re-use, recycling and recovery** within South London by encouraging the intensification of existing sites for the management of C&D and other waste streams. (4) Helping to secure the transition to a **circular economy** within south London by promoting the efficient use of employment land for the management of C&D and other waste streams. (6) Ensuring that all upgraded/ intensified waste management facilities for the management of C&D and other waste streams are **fully adapted to the future impacts of climate change** including summer heatwaves, contribution to the UHI effect, flooding and drought by promoting green infrastructure and appropriate SuDS in all upgraded/ intensified facilities for the management of C&D and other waste streams. (7) Ensuring that all upgraded/ intensified waste management facilities for the management of C&D and other waste streams incorporate appropriate **sustainable drainage (SuDS) measures**. (8) Promoting the highest standards of **sustainable design and construction** in all upgraded/ intensified waste management facilities for the management of C&D and other waste streams. (12) Protecting **biodiversity and habitats** by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of upgraded/ intensified waste management facilities for the management of C&D and other waste streams; and through specific biodiversity enhancements planned for the Hogsmill STW (RB Kingston) and the ongoing restoration of the Beddington Farmlands landfill site (due for closure in 2023). (13) Promoting **local employment and South London's economy** by eliminating the need for additional waste sites and/or 'broad locations' within SILs and other established industrial areas, thus safeguarding available industrial land and floorspace for other employment uses. (14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London, primarily by eliminating the need for additional sites for the management of C&D and other waste streams (15) Minimising the potentially adverse effects on human health and the open environment. (16) Promoting equalities objectives by avoiding the potentially adverse impacts which would otherwise be expected to arise from the designation of additional sites for the management of C&D and other streams and associated HGV movements, including air pollution, dust and noise. This is of particular benefit for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues. CONCLUSIONS The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Preferred Policy WP2 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (allowing proposals for C&D waste together with all 'other' waste streams including radioactive, agricultural or hazardous waste on both existing sites and all industrial areas and therefore carrying forward Policy WP2 of the existing SLWP) and Option 2B (allowing proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites). The potential impacts of *not* proceeding with a new waste plan including Preferred Policy WP1 are overwhelmingly negative.															

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	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP3: EXISTING WASTE SITES																
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. Intensification (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. Safeguarding Waste Hierarchy (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 This would involve retaining the broad industrial areas identified in Schedule 2 of the SLWP 2012 for potential waste development together with the existing safeguarded waste sites carried forward from Schedule 1	++	++	++	++	+				++	++	+	+	++	+	+	+
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	XX	XX	X	X	X				XX	XX	X	X	X	X	X	X

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

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	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP4: SITES FOR COMPENSATORY PROVISION																
OPTION 1: PREFERRED POLICY Proposals for new waste sites to provide compensatory provision should: **(a)** Demonstrate that the site is capable of providing sufficient compensatory capacity. **(b)** Be located on sites: (i) within Strategic Industrial Locations or Locally Significant Industrial Locations; (ii) not having an adverse effect on nature conservation areas protected by international or national regulations; (ii) 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 which will 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 This would involve retaining the development management criteria set out in relation to 'windfall sites' in Policy WP5	++	+	+?	+?	+?	+	++	+?	+	+?	+	+	+?	+?	+?	+?
OPTION 3: 'DO-NOTHING' SCENARIO This would involve not replacing the current SLWP 2012 and thus allowing Policy WP5 to expire in 2021	XX	XX	X	X	X	XX	XX	XX	XX	X	XX	XX	X	XX	XX	XX

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

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP5: PROTECTING AND ENHANCING AMENITY																
OPTION 1: PREFERRED POLICY **(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. **(b)** The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building. **(c)** Particular regard will be paid to: (i) The Green Belt, Metropolitan Open Land, recreation land or similar; (ii) Biodiversity, including nature conservation areas protected by international and national regulations as well as regional and local nature conservation; (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas; (iv) Groundwater, surface water etc; (v) Air emissions, including dust, arising from the on-site operations, plant and traffic ; (vi) Noise and vibration etc; (vii) Traffic generation, access and the suitability of the highway network, including access to and from strategic road network; (vii) Odour, litter, vermin and birds; and, (ix) The design of the facility, particularly: • Complementing/ improving local character; • limiting visual impact by employing hard and soft landscaping and minimising glare; • being of a scale, massing or height appropriate to townscape or landscape; • using good quality materials; • minimising exterior lighting; and, • utilising high-quality boundary treatments. The schedule below will provide the basis for the assessment of the impact.	+	++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+++	+++	+++
OPTION 2: CARRY FORWARD POLICY WP7 FROM SLWP 2012 This would involve retaining the development management criteria set out in relation to 'windfall sites' in Policy WP5	+?	+	++	++	++	++	++	++	++	++	++	++	+	++	++	++
OPTION 3: 'DO-NOTHING' SCENARIO This would involve not replacing the current SLWP 2012 and allowing Policy WP5 to expire in 2021	x	x	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx	x	xx	xx	xx

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Preferred Policy WP6 'Protecting and Enhancing Amenity** is predicted to have: LARGE BENEFICIAL IMPACTS (+++) FOR: (3) Promoting **waste re-use, recycling and recovery** within South London by requiring a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development; (4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible, again by requiring a Circular Economy Statement to be submitted; (5) M**inimising CO_2 emissions** from waste and associated HGV movements by requiring an Energy Assessment, BREEAM assessment ('Excellent' rating), Transport Assessment and Travel Plan to be submitted in support of any application; (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** including flooding, overheating, contribution to the urban heat island (UHI) effect and drought by requiring a Flood Risk Assessment (FRA), SuDS strategy, BREEAM assessment and sustainability statement; (7) Promoting **sustainable drainage (SuDS) measures** and greenfield run-off rates by 'having particular regard' to the potentially adverse impacts of compensatory or intensified waste developments on groundwater, surface water and watercourses and by requiring a Flood Risk Assessment (FRA), SuDS strategy/site drainage details and hydrological assessment to be submitted. As shown in the Sequential Test (Appendix 3), proposed waste facility located within higher flood risk areas will be required to demonstrate the Government's 'Exceptions test' in order to demonstrate that the development will provide (i) wider sustainability benefits to the community that outweigh flood risk, and (ii) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall; (8) Promoting the highest standards of **sustainable design and construction** in all such facilities by requiring a BREEAM assessment ('Excellent' rating) and sustainability statement to be submitted in support of any planning application. For larger waste management proposals with potentially 'significant' effects, an Environmental Assessment may be required under the EIA Regulations 2017 where this has been 'screened in' by the relevant local planning authority; (9) Promoting **sustainable transport** objectives by requiring an Air Quality Impact Assessment, Transport Assessment, Travel Plan, Route Management Strategy and Delivery Servicing Plan/Freight Plan to be submitted as appropriate in support of any planning application for a proposed compensatory or intensified waste development, in order to demonstrate any transport impacts do not significantly adversely affect people and the environment; (10) Minimising **air pollution** and potential impacts on sensitive land-uses arising, particularly within 'Air Quality Focus Areas' by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building and requiring the submission of Air Quality Impact Assessments, Transport Assessments, Travel Plans, Route Management Strategies and Delivery Servicing Plans/Freight Plans as appropriate; (11) Protecting the quality of **South London's environment**, particularly for vulnerable receptors, by ensuring that any potential adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment. More specifically, under Part (c) of this policy, any planning application for such development must be accompanied by an Air Quality Impact Assessment, Transport Assessment and Travel Plan, and 'have particular regard' to the potentially adverse impacts on open space; biodiversity and nature conservation sites; archaeological sites; the historic environment; sensitive receptors, such as schools, hospitals and residential areas; groundwater, surface water and watercourses; air emissions, including dust noise and vibration and traffic generation. arising from waste management operations and associated HGV movements (12) Protecting **biodiversity and habitats** by 'having particular regard' to the potentially adverse impacts on biodiversity and nature conservation sites protected by international/ national regulations or local planning designations and by requiring a Biodiversity Assessment to be submitted in support of any planning application which is likely to affect nature conservation areas such as Local Nature Reserves, Sites of Metropolitan, Borough or Local Importance for Nature Conservation (SINCs), or green corridors. In certain cases (e.g. LB Sutton) biodiversity accounting evidence will need to be submitted to demonstrate that there will be no net loss of biodiversity value arising from the development. (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by requiring job creation details, including skills, training and apprentice opportunities, together with a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development (14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London by ensuring that all compensatory or intensified waste developments are of a scale, massing or height appropriate to the local townscape or landscape; minimising the requirement for exterior lighting; utilising high-quality boundary treatments; and having 'particular regard' to the potentially adverse impacts on the historic environment. Under this policy, any potentially adverse impacts on townscape and visual amenity will be addressed or mitigated by requiring the submission of an assessment of the impact on the built and historic environment, a landscape assessment and details of landscaping proposals, including screening, landscaping works and boundary treatments to be submitted in support of any planning application; (15) Minimising any potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building. Planning applications for a proposed compensatory or intensified waste development must be accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. Details of appropriate measures for protecting Public Rights of Way are also required to be submitted where relevant (16) Promoting **equalities, accessibility and social inclusion** by requiring an Access Strategy to be submitted in support of any planning application. Since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way is also beneficial. MEDIUM BENEFICIAL IMPACTS (++) FOR: (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed to achieve levels that will not significantly adversely affect people and the environment; and by requiring applications to be supported by the relevant information listed in the schedule attached to Policy WP5, including a Circular Economy Statement. SMALLER BENEFICIAL IMPACTS (+) FOR: (1) Promoting **net self-sufficiency** within South London by allowing for developments for compensatory or intensified waste facilities to proceed *subject to* meeting the requirements of Policy WP4 'Sites for Compensatory Provision' and provided that it can be demonstrated that 'any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment' as required in Part (a) CONCLUSIONS The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Preferred Policy WP5 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP5 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan including Preferred Policy WP1 are overwhelmingly negative															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES																
OPTION 1: PREFERRED POLICY **(a)** Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with the South London Waste Plan and any other relevant policies of the relevant borough's Development Plan. **(b)** Waste facilities will be required to: (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 in accordance with the Draft London Plan Policy GG6 , particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with Draft London Plan Policy G5; (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials; (v) minimise waste and promote sustainable management of construction 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	X	X	XX	XX	XX	XX	XX	XX	X	XX	XX	X	X	XX	XX	XX

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

COMMENTARY

Preferred Policy WP6 'Sustainable Design and Construction of Waste Facilities is predicted to have::

LARGE BENEFICIAL IMPACTS (+++) FOR:

(2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by requiring all waste developments to achieve BREEAM 'Excellent'; to make more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement; to demonstrate that they minimise waste and promote sustainable management of construction wastes on site; to minimise on-site CO_2 emissions in line with the 35% target in Policy SI2 of the draft new London Plan and deliver net zero carbon standards through carbon offsetting; and to require all waste developments to give consideration to the recycling of Construction, Demolition and Excavation (CD&E) waste on-site.

(3) Promoting **waste re-use, recycling and recovery** within South London by requiring all proposed waste developments to achieve BREEAM 'Excellent' where viable; demonstrate how it will make more efficient use of resources and reduce the lifecycle impacts of construction materials; demonstrate how it will support circular economy principles through the submission of a Circular Economy Statement (as required under Policy WP5); and demonstrate that the facility will minimise waste and promote sustainable management of construction wastes on site.

(4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by requiring submission of a Circular Economy Statement (as required under Policy WP5) and by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&E) waste on-site

(5) M**inimising CO_2 emissions** from waste and associated HGV movements by requiring all major waste developments to minimise on-site CO_2 emissions in line with the 35% target in Policy SI2 of the draft new London Plan; deliver net zero carbon standards through developer contributions to the respective carbon offset funds operated by each of the four boroughs; and requiring all waste developments to achieve BREEAM 'Excellent' where viable.

(6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** in accordance with Draft London Plan Policy GG6 , particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; and by requiring all waste developments to have regard to best practice in 'Designing Waste Facilities - A Guide to Modern Design in Waste' (DEFRA, 2008) in considering climate change adaptation measures in schemes e.g. by ensuring that building layout takes advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter; by ensuring that external cladding materials are high mass (e.g. brick or concrete) as they release heat slowly; and by steering storage and unoccupied areas towards the warmest areas of the facility.

(7) Avoiding reducing and managing **flood risk to and from waste developments by** incorporating appropriate SuDS measures in line with Draft London Plan Policy G5, the partner boroughs' Strategic Flood Risk Assessments (SFRAs) and the relevant local planning policies. This require developers to provide details of the design storm period and intensity, proposed SuDS measures to delay and control the rate of surface water discharged from the site and proposed measures to prevent pollution of the receiving groundwater and/or surface waters. In most cases, proposed waste developments will need to demonstrate that (i) the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be as close as reasonably practicable to the greenfield run-off rate for the same event (in line with the Government's non-statutory standards) (ii) where greenfield run-off rates cannot be achieved, to demonstrate that the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be no more than 3 times the calculated greenfield run-off rate for the same event (iii) demonstrate that the 1 in 30 year rainfall event (plus 30% for climate change) can be contained without flooding; any flooding occurring between the 1 in 30 and 1 in 100 year event (plus 30% for climate change) will be safely contained on site; and that rainfall in excess of the 1 in 100 year event is managed to minimise risks. For locations within the River Wandle catchment, all waste developments must support of the objectives of the River Wandle Catchment Flood Management Plan (CFMP).

(8) Promoting the highest standards of **sustainable design and construction** in all such facilities by requiring all waste developments to achieve BREEAM 'Excellent' where viable and, as part of the construction phase, by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&E) waste on-site.

(10) Minimising **air pollution** and potential impacts on sensitive land-uses arising by making more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement and by requiring all waste developments to incorporate appropriate measures to address odour issues, for example by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5.

(11) **Minimising the adverse impacts arising from the construction and operation of waste facilities** by requiring all waste developments to achieve BREEAM 'Excellent' where viable; to have regard to best practice in 'Designing Waste Facilities - A Guide to Modern Design in Waste' (DEFRA, 2008); to protect, manage and enhance local habitats and biodiversity; to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures which manage risk both to and from the development over its planned lifetime

(15) Minimising any potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5

(16) Promoting **equalities, accessibility and social inclusion** by ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change** in accordance with Draft London Plan Policy GG6. Climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as , such as the young, the elderly and people suffering from respiratory issues

MEDIUM BENEFICIAL IMPACTS (++) FOR:

(9) Promoting **sustainable transport** objectives by requiring all waste developments to demonstrate that they minimise waste and promote sustainable management of construction wastes on site.

(12) Protecting **biodiversity and habitats** by requiring all waste developments to demonstrate that they 'protect, manage and enhance local habitats and biodiversity' for example by incorporating green roofs and other blue and green infrastructure measures as appropriate. However this is also subject to the implementation of part (c) of Policy WP5 which seeks to ensure that that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected

(13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by making more efficient use of resources and promoting circular economy principles.

SMALLER BENEFICIAL IMPACTS (+) FOR:

(1) Promoting **net self-sufficiency** within South London

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

CONCLUSIONS

The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Preferred Policy WP6 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan including Preferred Policy WP1 are overwhelmingly negative.

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

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Preferred Policy WP8 'The Benefits of Waste** is predicted to have:: LARGE BENEFICIAL IMPACTS (+++) FOR: (1) Promoting **net self-sufficiency** within South London by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products. (2) Promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products; and by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy. (3) Promoting **waste re-use, recycling and recovery** within South London by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products, such as biogas from composting and refuse-derived fuel. (4) Helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible while by recognising that achieving London-wide waste reduction and recycling targets will mean that no new EfW in London will be needed. (5) M**inimising CO_2 emissions** from waste and associated HGV movements by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products? (10) Minimising **air pollution** and potential impacts on sensitive land-uses by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place) (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas (15) Minimising any potentially adverse effects on **human health and the open environment**, particularly within areas affected by social deprivation, by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place) (16) Promoting **equalities, accessibility and social inclusion** by ensuring that by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas MEDIUM BENEFICIAL IMPACTS (++) FOR: (8) Promoting the highest standards of **sustainable design and construction** by encouraging waste treatment applications which achieve a prolonged product life (i.e. through reuse and refurbishment), provide secondary materials through remanufacture, lead to the production of by-products, such as biogas from composting and refuse derived fuel (11) **Minimising the adverse impacts arising from the construction and operation of waste facilities** by encouraging proposals for the intensification of existing waste management sites SMALLER BENEFICIAL IMPACTS (+) FOR: (12) Protecting **biodiversity and habitats** by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy. NEUTRAL IMPACTS FOR: (6) Ensuring that all new or upgraded waste management facilities are **fully adapted to the future impacts of climate change**. (7) Avoiding reducing and managing **flood risk to and from waste developments**. (9) Promoting **sustainable transport** objectives. (14) Minimising the adverse impacts of waste management facilities on the quality of **townscape and visual amenity** in south London. n/a CONCLUSIONS The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Preferred Policy WP7 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of *not* proceeding with a new waste plan are generally negative.															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
POLICY WP8: 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	?	?		?	?	?	?	?	?	?	?	?	?	?	?	?

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy withi south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **TOWNSCAPE AND VISUAL AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve
COMMENTARY	**Preferred Policy WP8 'The Benefits of Waste** is predicted to have:: MEDIUM BENEFICIAL IMPACTS (++) FOR: (2) Helping to promote an environmentally **sustainable strategic approach** to managing South London's waste arisings by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation sites of international, national, regional or local importance; environmental enhancement measures; flood risk compensation works; archaeological investigation, recording and keeping of artefacts and safeguarding of remains; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; job brokerage, training and skills to encourage local employment opportunities; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs. (6) Helping to ensure that all new or upgraded waste management facilities are **adapted to the future impacts of climate change** by potentially providing for flood risk alleviation works, off-site monitoring of the water environment, off-site planting, environmental enhancement measures and other climate change adaptation measures. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy. (7) Helping to avoid, reduce and manage **flood risk to and from waste developments** by potentially contributing towards for off-site flood risk alleviation works. (8) Helping to promote the highest standards of **sustainable design and construction** by potentially providing for low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation; or flood risk alleviation works (9) Helping to deliver **sustainable transport** objectives by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; off-site monitoring of emissions; and any other strategic transport infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs. (10) Helping to minimise **air pollution** and potential impacts on sensitive land-uses by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; environmental enhancement measures; off-site monitoring of emissions and the water environment; and the provision and management of off-site or advance planting and screening measures. (11) Helping to minimise the **adverse impacts arising from the construction and operation of waste facilities** by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs. (12) Helping to promote **biodiversity and habitats** through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures (13) Promoting **local employment, South London's economy and the competitiveness of the waste sector** by potentially providing for job brokerage, training and skills to encourage local employment opportunities; and the delivery of key strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs (15) Helping to minimise potentially adverse effects on **human health and the open environment** by potentially providing for additional traffic management measures (including the routing of vehicles; access and highway improvements); protection of nature conservation sites of international, national, regional or local importance; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; low or zero carbon infrastructure;;; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures; and other environmental enhancement measures (16) Helping to promote **equalities, accessibility and social inclusion** within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities; It should be noted however that, under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy. SMALLER BENEFICIAL IMPACTS (+) FOR: (1) Helping to promote net self-sufficiency within South London by enabling proposals for the intensification of existing waste management sites or compensatory provision to proceed which may otherwise be unacceptable in planning terms. (4) In certain circumstances, helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by potentially providing for low or zero carbon infrastructure and carbon offsetting contributions. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy. (5) Helping to m**inimising CO_2 emissions** in certain circumstances by providing for access and highway improvements; low or zero carbon infrastructure or carbon offsetting contributions. (14) Helping to minimise the adverse impacts of waste management facilities on the quality of **townscape and visual amenity and the historic environment** in south London by potentially providing for environmental enhancement measures; the provision and management of off-site or advance planting and screening measures; and archaeological investigation, recording and keeping of artefacts and safeguarding of remains. NEUTRAL IMPACTS FOR: (3) Promoting **waste re-use, recycling and recovery** within South London. CONCLUSIONS The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Preferred Policy WP8 is likely to have beneficial impacts on the majority of sustainability objectives making up the SA Framework and these beneficial impacts are broadly unchanged from Policy WP8 of the existing SLWP 2012 (since the policy wording has been carried forward unchanged).. While the effects of *not* proceeding with a new waste plan and therefore deleting Policy WP8 of the existing SLWP 2012 are appraised as uncertain, rather than necessarily negative, since under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy															

SUSTAINABILITY APPRAISAL MATRIX

Part B: Proposed Sites

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: CROYDON																
C1 Able Waste Services 42 Imperial Way, Croydon CR0 4RR	+++	++	++	+	+	+?)	+	+?	+?	+?	+?	?	++	+?	+?	?
C2 Croydon Car Spares 111 Aurelia Road, Croydon CR0 3BF	+	+					+		?	?	+?	?		x	?	x?
C3 Curley Skip Hire Rear of 64 Northwood Road, Croydon CR7 8HQ (0.07 ha)	+	+					+		?	?	?			x	?	x?

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

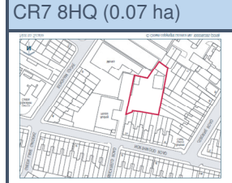
NOTES:
- the site is comprised of mix of new and 1970s warehouses, mostly two-storey, located lies within the Imperial Way Industrial Estate which;
- good access to strategic road network;
- potential cumulative impact with New Era Metals ;
- located within Archaeological Priority Area;
- located in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

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

Type	Transfer
Waste Accepted	HIC + hazardous
Max throughput	241
Licensed capacity	572

NOTES:
- site consists of a small double-storey interwar workshop located within a mixed use area with residential properties either side and an industrial area / retail park opposite;
- narrow residential street;
- no other waste sites nearby;
- located within Archaeological Priority Area;
- located in close proximity to MOL, SINC and listed Historic Parks & Gardens to rear of property;
- not located within Air Quality Focus Area or any other environmental designation;;
- low flood risk (Flood Zone 1)
- not considered suitable for intensification or expansion since this is a very constrained site.

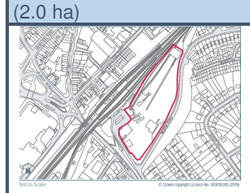
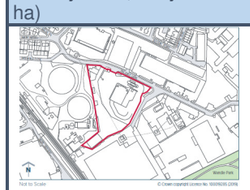
RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts and having regard to the future occupiers of the allocated housing site and community use.

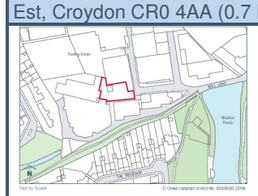
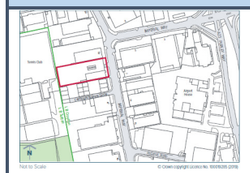


Type	Transfer
Waste Accepted	HIC + C&D
Max throughput	9.294
Licensed capacity	10,920

NOTES:
- mainly open skip storage and hardstanding with some single-storey covered areas for sorting of waste;
- site lies within a small industrial site located in a predominantly residential area. The units are mainly 2-3 storey inter-war sheds
- no other waste sites nearby;
- the site is adjacent to a site allocations for a replacement community facility and for residential use which is currently being redeveloped.
- access from Northwood Road which is predominantly residential
- not located within Archaeological Priority Area;
- not located within Air Quality Focus Area or any other environmental designation;
- low flood risk (Flood Zone 1)
- no potential for intensification;

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building;
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts and having regard to the future occupiers of the allocated housing site and community use.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
C4 Days Aggregates Purley Depot, Station Yard, Approach Road, Purley, Surrey, CR8 2AL (2.0 ha)	+++	+++	++	++	++		+		+	x?	x?		++	?	x	x?
 Not to Scale © Crown copyright and database rights 2019 OS 100035409 Type: Transfer + treatment Waste Accepted: C&D Max throughput: 179,300 Licensed capacity: 249,999	NOTES: • open aggregates sorting, treatment, recycling and storage facility with associated two-storey mid-century office block and enclosed sheds; • reasonably isolated from nearby residential uses and no other waste uses nearby; • access via Approach Road - a no through road serving Purley Station, Day Aggregates and London Concrete • located adjacent to Purley rail aggregate terminal. • located within Purley Cross and Russell Hill AQFA • located within Archaeological Priority Area • not located within Green Belt or MOL or any other designation • Low flood risk (Flood Zone 1); and • low potential for intensification .								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts • Evaluating and preserving any archaeological remains as the site lies within an • archaeological priority area – London to Brighton Road • Not harming biodiversity in the vicinity • Providing appropriate soft landscaping						
C5 Factory Lane Special Waste Transfer Station, Factory Lane, Croydon CR0 3RL (1.8 ha)	+++	++ (potentially)	+ (potentially)	+ (potentially)	+ (potentially)	++ (potentially)	x	+ (potentially)	+ (potentially)	+	+	?	++ (potentially)	+	+ (potentially)	+ (potentially)
 Not to Scale © Crown copyright and database rights 2019 OS 100035409 Type: Transfer Waste Accepted: HIC Max throughput: 19,736 Licensed capacity: 200,000	NOTES: • large triple-storey building surrounded by hardstanding with power lines overhead; • located within larger industrial area close to other waste facilities but away from residential neighbourhoods; • good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236. • located within Archaeological Priority Area; • located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site. • Located in close proximity to Wandle Park to the south east of the site. • not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and • Some potential for intensification and for co-locating other waste uses on the site.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts • Minimising flood risk on- and off-site • Evaluating and preserving any remains in the Ampere Way archaeology priority area • Not harming biodiversity in the vicinity • Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected						
C6 Fishers Farm Reuse & Recycling Centre North Downs Road, New Addington, Croydon, Surrey, CR0 0LF (0.2 ha)	++	+	++	+	++		+		?	?	?		+	?	?	
 Not to Scale © Crown copyright and database rights 2019 OS 100035409 Type: Transfer (Household Waste Amenity Site) Waste Accepted: HIC Max throughput: 6,895 Licensed capacity: 15,125	NOTES: • open local authority household reuse and recycling center; • located on the edge of the residential area adjacent to farmland; • no other waste uses nearby; • good access from North Downs Road; • located within Archaeological Priority Area; • located in close proximity to MOL and SINC to west of site and 100m north of site; • Not located within an Air Quality Focus Area (AQFA). • not located within any other environmental designation; • Flood Zone 1 (low risk); and • Low potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area; • Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Riddlesdown; • Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; • Designing a facility that does not impact on the openness of Metropolitan Green Belt and • Providing appropriate soft landscaping						

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
C7 Henry Woods Waste Management Land Adj To Unit 9, Mill Lane Trading Est, Croydon CR0 4AA (0.7 ha)	++	+	++	+	+		+		+?	+?	+?		+	?	?	
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer + treatment Waste Accepted: HIC and C&D Max throughput: 12,885 Licensed capacity: 74,999	NOTES: • open skip storage and waste sorting located within an existing strategic industrial area (SIL); • existing residential uses located to the south and a site allocation for mixed uses lies to the east; • access from road network from Mill Lane; • no other safeguarded waste sites in Purley Way North; • very constrained site; • located within Archaeological Priority Area; • located in close proximity to SINC and undesignated open space to the south of the site; • not located within an Air Quality Focus Area (AQFA); • not located within any other environmental designation; • Flood Zone 1 (low risk); and • no potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads.							
C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR (0.37 ha)	++	++	++	+	+		+		+	+?	+?	+?	+	?	?	?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Recycling and Reuse Waste Accepted: HIC / Hazardous Max throughput: 4,213 Licensed capacity: 4,999	NOTES: • modern double-storey warehouse with adjacent hardstanding area for metal sorting; • within the Imperial Way SIL which comprises a mix of new and mid-century warehouses, mostly two-storey; • good access to the strategic road network from Imperial Way; • two waste operators in this area: Able Waste Services and New Era Metals; • located within Archaeological Priority Area • located in close proximity to Croydon Panorama and MOL 300m to south east of site; • not located within an Air Quality Focus Area (AQFA); • not located within any other environmental designation; • Flood Zone 1 (low risk); and • low potential for intensification.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank; • Not harming biodiversity in the vicinity; • Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; and • Providing appropriate soft landscaping.							
C9 Peartree Farm Featherbed Lane, Croydon CR0 9AA (1.8 ha)	++	+	++	+	+		+		X	X	X		+	X	X	
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer Waste Accepted: HIC and C&D Max throughput: 59,282 Licensed capacity: 37,500	NOTES: • uncovered sorting facility, skip storage area along with vehicle storage and repair; • located within the green belt surrounded by farmland; • access from Featherbed Lane; • no other waste uses nearby • located within Archaeological Priority Area and Green Belt; • not located within an Air Quality Focus Area (AQFA); • Flood Zone 1 (low risk); and • no potential for intensification								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Protecting the amenity of those using the nearby open spaces; • Evaluating and preserving any archaeological remains as the site is in the archaeological priority area - Croydon Downs; • Minimising flood risk on- and off-site; • Not harming biodiversity in the vicinity; • Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; • Designing a facility that does not impact on the openness of Metropolitan Green Belt; and • Providing appropriate soft landscaping							

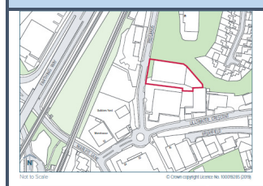
	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
C10 Purley Oaks Civic Amenity Site Brighton Road, Purley, Surrey, CR8 2BG (0.22 ha)	++	+	x	x			xx		x	x	x		+	x?	xx	

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

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

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

C11 Safety Kleen Unit 6b, Redlands, Coulsdon, Surrey, CR5 2HT (0.28 ha)	++	++ (potentially)	++ (potentially	++ (potentially	++	+	+	+ (potentially	++	+	+	x?	+ (potentially	x?	x?	+



Type	Transfer
Waste Accepted	Hazardous
Max throughput	Not operational
Licensed capacity	12,782

NOTES:
- large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear;
- to the east of the site is residential housing with a buffer of green space and trees;
- good access from the road network via Redlands;
- no other waste uses nearby;
- railway lines to the west, therefore an opportunity to use rail to transport waste;
- located in close proximity to SINC 50m to east
- not located within an Air Quality Focus Area (AQFA); Archaeological Priority Area or any other environmental designation;
- Flood Zone 1 (low risk);
- large potential for intensification (site currently vacant).

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts

C12 Stubbs Mead Depot Factory Lane, Croydon CR0 3RL (2.71 ha)						X?	xx		++				+++	X?	X?	

Type	Vehicle depot related to HH waste collection
Waste Accepted	n/a
Max throughput	n/a
Licensed capacity	n/a

NOTES:
- large double-storey shed with hardstanding for vehicles;
- located within the Factory Lane industrial area and away from residential uses;
- there are a number of other waste facilities in this area;
- access via Factory Lane;
- located in close proximity to a locally listed historic park and garden to the south;
- not located within any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 3 (high risk). The north west corner of the site falls within FZ3 and the rest of the site is FZ2; and
- No potential for intensification (site proposed for mixed residential and employment)

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

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

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: KINGSTON

K1 Chessington Equestrian Centre Clayton Road, Kingston KT9 1NN (9.9 ha)	+++	+?	+?	x			+		x	x	x		+	x?	x?	

Type	Reclamation
Waste Accepted	Excavation
Max throughput	44,285
Licensed capacity	99,999

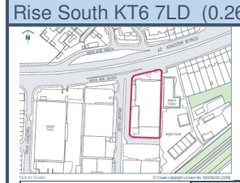
NOTES:

- open facility involving deposit of waste to land as a recovery operation;
- adjacent to Chessington Equestrian Centre
- mobile homes and an industrial area to the south of the site;
- no other waste uses nearby;
- access along un-named road from Clayton Road;
- located within Green Belt;
- not located within an Air Quality Focus Area (AQFA) or any other environmental designation;
- flood Zone 1 (low risk); and
- no potential for intensification (not a permanent waste site).

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the nearby Hook and Southborough Cricket Club and King Edward's Recreation Ground
- Not harming biodiversity in the vicinity
- Designing a facility that does not impact on the openness of Green Belt
- Providing appropriate soft landscaping.

K2 Genuine Solutions Group Solutions House, Unit 1A, 223 Hook Rise South KT6 7LD (0.26 ha	++	++	++	++			+		x?	x?	x?		+	x?	x?	



Type	Recycling & Reuse
Waste Accepted	HIC
Max throughput	1,630 (planning application 5,000)
Licensed capacity	74,999

NOTES:

- WEEE treatment facility located within an industrial area surrounded by similar large industrial sheds;
- two-storey office block fronting on Hook Rise South beyond which is the Kingston Bypass fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear
- residential properties lie to the east and west of the industrial area; to the north of Kingston bypass is residential properties, Swallow Park Gypsy and Traveller site and to the west of this is school playing fields
- no other waste uses nearby
- access from Hook Rise South
- located within Tolworth Key Area of Change (Kingston Neighbourhood Policy SB1)
- located in close proximity to MOL to the east of Chessington SIL and green corridor to the south of the site;
- not located within any other environmental designation;
- Flood Zone 1 (low risk);
- low potential for intensification;

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the nearby Tolworth Recreation Ground, King George's Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Providing appropriate soft landscaping

K3 Kingston Civic Amenity Site Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (2.03 ha including Kingston WTS)	++	++	+	+	+?	+?	+?	+?	+?	+?	+	+	+	x?	?	?

Type	Transfer
Waste Accepted	HIC
Max throughput	14,363
Licensed capacity	25,000

NOTES:

- enclosed local authority reuse and recycling centre (Household Waste Amenity Site) within an industrial area;
- surrounded by open space but away from residential uses;
- on same site as Kingston Waste Transfer Centre and close to Hogsmill Sewage Treatment Works;
- adjacent to Hogsmill River but little opportunity to transport waste by water;
- access via Chapel Mill Road. Additions to the Strategic Cycle Network are proposed along the north bank of Hogsmill River;
- located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) and Area of Archaeological Significance;
- located in close proximity to MOL, Green chain and SINC to the north and south of the site
- not located within Air Quality Focus Area (AQFA) or any other environmental designation;
- Flood Zone 1 (low risk); and
- uncertain potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve;
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains;
- Not harming biodiversity in the vicinity;
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected;
- Providing appropriate soft landscaping.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
K4 Kingston Waste Transfer Station Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (2.03 ha including Kingston RRC)	+++	+ (potentially)	+ (potentially)	+ (potentially)	+?	+?	+?	+?	++?	+?	+?	+	++	+?	+?	+?

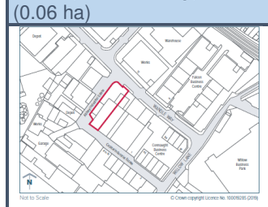
Type	Transfer
Waste Accepted	HIC
Max throughput	68,883 tpa
Licensed capacity	200,500 tpa

NOTES:
- Household, Commercial & Industrial Waste Transfer Station located within an industrial area;
- Double-storey enclosed shed with hardstanding for vehicles;
- surrounded by open space but away from residential uses;
- on same site as Kingston RRC (Site K3) and close to Hogsmill Sewage Treatment Works;
- adjacent to Hogsmill River little opportunity to transport waste by water;
- access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of Hogsmill;
- located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) and Area of Archaeological Significance;
- located in close proximity to MOL, Green chain and SINC to the north and south of the site;
- not located within Air Quality Focus Area (AQFA) or any other environmental designation;
- Flood Zone 1 (low risk).

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve;
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains;
- Not harming biodiversity in the vicinity;
- Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected
- Designing a facility that does not impact on the openness of Metropolitan Open Land; and
- Providing appropriate soft landscaping.

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: MERTON

M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA (0.06 ha)	+	+	++	+	+	+?	+	+?	++?	+?	+?	x?	+	+?	+?	+?

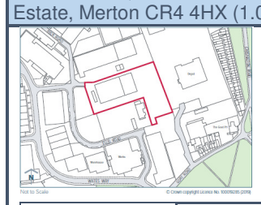


Type	Transfer +recycling
Waste Accepted	HIC
Max throughput	3,729
Licensed capacity	5,000

NOTES:
- Household, Commercial & Industrial Waste Transfer Station located within Willow Lane Industrial Estate;
- open area with skips.
- residential uses to the south of the site (Connect House was converted to residential use via Prior Approval);
- concentration of waste uses in Willow Lane Industrial Estate;
- road access via Wandle Way
- located within Archaeological Priority Area
- located in close proximity to areas of MOL and SINC to the east and west of Willow SIL
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 1 (low risk); and
- low potential for intensification since throughput per hectare is average for this type of facility.

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

M2 European Metal Recycling 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX (1.03 ha)	+++	+++	+++	+++	+?	+?	+	+?	++?	+?	+?	x?	+	?	+?	+?



Type	Recycling + Reuse
Waste Accepted	HIC
Max throughput	70,100
Licensed capacity	109,500

NOTES:
- collection of large double-storey warehouses and office space with hardstanding for metal sorting, vehicles and skips located in Willow Lane Industrial Estate;
- residential uses to the south of the site (Connect House converted to residential use via Prior Approval);
- already a concentration of waste uses in Willow Lane Industrial Estate;
- road access via Ellis Road, suitable for large vehicles;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC to the east and west of Willow SIL
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The majority of the site is within Flood Zone 2; and
- low potential for intensification since throughput per hectare is good for this type of facility.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains; and
- Providing appropriate soft landscaping.

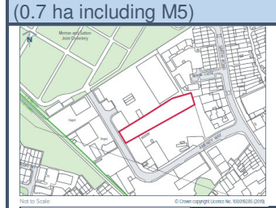
	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA (0.38 ha)	+	+	++	++	?	?	x?	+?	+?	?	?	?	++	?	x?	x?

Type	Recycling
Waste Accepted	HIC
Max throughput	5,000
Licensed capacity	n/a (exempt site)

NOTES:
- facility for sorting and baling paper for recycling located in Willow Lane Industrial Estate;
- hardstanding for material sorting, vehicles and skips together with two storey portakabin office;
- residential uses to the south of the site (Connect House converted to residential use via Prior Approval);
- already a concentration of other waste uses in Willow Lane Industrial Estate;
- access via Willow Lane;
- located within Archaeological Priority Area
- located in close proximity to areas of MOL and SINC to the east and west of Willow SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk); and
- possibly some potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains;
- Providing appropriate soft landscaping.

M4 Garth Road Civic Amenity Site, 66-69 Amenity Way, Garth Road, Merton SM4 4AX (0.7 ha including M5)	+++	+++	+++	+++	+?	+?	x?	+?	+?	+?	+?	?	++	?	?	?

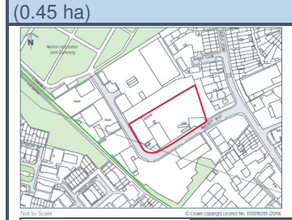


Type	Re-use, recycling and transfer
Waste Accepted	LACW
Max throughput	14,594
Licensed capacity	25,000

NOTES:
- local authority reuse and recycling centre located within the Garth Road Industrial Estate;
- the site incorporate a household reuse and recycling centre and Merton Council's LACW Transfer Station;
- a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west;
- there is housing adjacent to the site at Beaver Close;
- access is gained via Garth Road, which also has houses along it;
- not located within Air Quality Focus Area (AQFA), Archaeological Priority Area or any other environmental designation;
- Flood Zone 1 (low risk); and
- uncertain potential for intensification.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and
- effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially
- with regard to air emissions and noise impacts;
- Providing appropriate soft landscaping

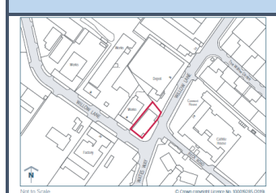
M5 Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merto SM4 4AX (0.45 ha)	++	++	+?	+?	+?	+?	x?	+?	+?	+?	+?	?	++	?	?	?

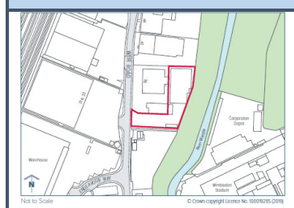
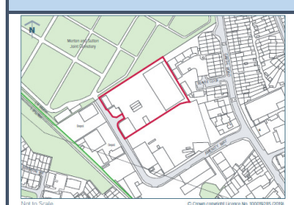


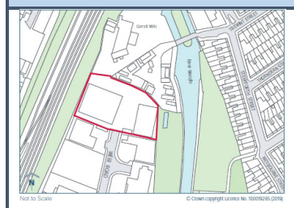
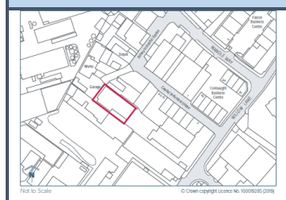
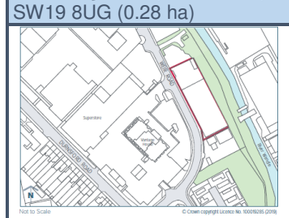
Type	Transfer
Waste Accepted	C&D
Max throughput	18,839
Licensed capacity	22,281

NOTES:
- transfer station located within the Garth Road Industrial Estate;
- site shared between the household reuse and recycling centre and Merton council's LACW transfer station;
- a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west;
- housing adjacent to the site to the east and also housing adjacent to the site at Beaver Close
- access is gained from the 24 via Garth Road, which also has houses along it;
- not located within Air Quality Focus Area, Archaeological Priority Area or any other environmental designation;
- Flood Zone 1 (low risk); and
- uncertain potential for intensification.

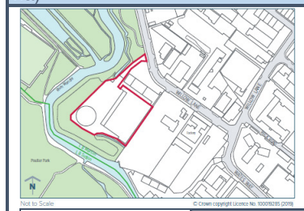
RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; and
- Providing appropriate soft landscaping.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M6 George Killoughery 41 Willow Lane, Merton CR4 4NA	++	++	?	?	+?	+?	x?	+?	+?	+?	+?	?	++	?	?	?
 Type: Transfer Waste Accepted: C&D Max throughput: 71,253 Licensed capacity: 74,999	NOTES: • a large site located within Willow Lane industrial estate comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste; • concentration of waste uses within this industrial estate; • River Wandle lies to the west of the sit but no real potential for transportation of waste by water; • Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site • access via Willow Lane; • located within Archaeological Priority Area; • located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow Lane SIL; • not located within or any other environmental designation; • Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2; • low potential for intensification (since the throughput per hectare is average for this type of facility). ;								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Minimising flood risk on- and off-site; • Evaluating and preserving any archaeological remains; • Not harming biodiversity in the vicinity; • Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; • Designing a facility that does not impact on the openness of Metropolitan Open Land; • Providing appropriate soft landscaping.						
M7 LMD Waste Management Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA (0.06 ha)	++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	?	?	?
 Type: Transfer Waste Accepted: C&D Max throughput: 24,444 Licensed capacity: 74,999	NOTES: • mainly open hardstanding site located within Willow Lane industrial estate surrounded by similar industrial properties; • Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south • there is a concentration of waste uses in Willow Lane Industrial Estate. • access from Wandle Way; • located within Archaeological Priority Area; • located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk); • no potential for intensification (given the small scale and lack of permission for waste use for this site).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Evaluating and preserving any archaeological remains; and • Providing appropriate soft landscaping.						
M8 LMD Waste Management 32 Willow Lane, Merton CR4 4NA (0.07 ha)	+++	++	?	?	+?	+?	x?	+?	+?	+?	+?	?	++	+?	?	?
 Type: Transfer Waste Accepted: C&D Max throughput: 38,738 Licensed capacity: 50,000	NOTES: • double-storey shed with attached single-storey offices located within Willow Lane industrial estate; • Connect House, which was converted to residential use via Prior Approval, lies opposite the site; • there is a concentration of waste uses in the Willow Lane Industrial Estate; • access via Willow Lane; • located within Archaeological Priority Area; • located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow SIL; • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 2 (medium risk); and • unsuitable for intensification due to proximity of Connect House and the throughput ratio is above average for this type of facility.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Minimising flood risk on- and off-site; • Evaluating and preserving any archaeological remains; and • Providing appropriate soft landscaping.						

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M9 Maguire Skips (0.19 ha) Storage Yard Wandle Way, Merton CR4 4NB	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer Waste Accepted: C&D Max throughput: 58,150 Licensed capacity: 74,999	NOTES: • mainly open hardstanding for skips and sorting together with a double-storey covered area located within Willow Lane industrial estate; • Connect House, converted to residential use via Prior Approval, lies opposite the site; • there is a concentration of waste uses in the Willow Lane Industrial Estate. This facility lies near residential properties and has been the subject of noise and planning enforcement investigations; • access via Wandle Way; • located within Archaeological Priority Area; • located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow SIL; • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (medium risk); and • unsuitable for intensification since the throughput ratio is above average for this type of facility									RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and • effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially • with regard to air emissions and noise impacts; • Evaluating and preserving any archaeological remains; • Providing appropriate soft landscaping.						
M10 Maguire Skips (0.3 ha) 36 Weir Court, Merton SW19 8UG	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer Waste Accepted: C&D Max throughput: 53,313 Licensed capacity: 74,999	NOTES: • enclosed double-storey shed with outside hardstanding space located within Durnsford Road SIL; • Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site; • three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and Reston Waste Transfer and Recovery. • Access via Weir Road to strategic road network; • although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; • located within Archaeological Priority Area • located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and • low potential for intensification (throughput per hectare is good for this type of facility).									RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Evaluating and preserving any archaeological remains; • Not harming biodiversity in the vicinity; • Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected; • Designing a facility that does not impact on the openness of Metropolitan Open Land; • Providing appropriate soft landscaping;						
M11 Morden Transfer Station (0.8 ha) Amenity Way, Merton SM4 4AX	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer Waste accepted: HIC + C&D Max throughput: 39,950 Licensed capacity: 74,999	NOTES: • double-storey industrial shed with hardstanding; • there is a number of waste uses in this area, including Merton Reuse and Recycling Centre. • site is adjacent to residential properties in Beaver Close; • access from Amenity Way • located in close proximity to Green Corridor and a SINC on the north-western boundary. Cemetery designated MOL; • not located within an Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk); and • uncertain potential for intensification									RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Protecting the amenity of those using the adjacent cemetery; • Not harming biodiversity in the vicinity; • Designing a facility that does not impact on the openness of Metropolitan Open Land; • Providing appropriate soft landscaping						

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M12 NJB Recycling (0.35 ha) 77 Weir Road, Merton SW19 8UG	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • enclosed two and three-storey sheds and warehouses with outside hardstanding space for vehicles located within Durnsford Road SIL; • Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site. The site is also adjacent to a Gypsy and Travellers site in LB Wandsworth; • there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery; • access via Weir Road to strategic road network; • although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; • located within Archaeological Priority Area • located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); • low potential for intensification (throughput per hectare is good for this type of facility).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Minimising flood risk on- and off-site; • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Protecting the amenity of those using the future Wandle Valley Regional Park • Evaluating and preserving any archaeological remains; • Not harming biodiversity in the vicinity; • Ensuring nearby watercourses are not harmed by the development and EA buffer zones are respected • Designing a facility that does not impact on the openness of Metropolitan Open Land; • Providing appropriate soft landscaping.							
	Type: Transfer Waste Accepted: C&D Max throughput: 48,687 Licensed capacity: 75,000															
M13 One Waste Clearance Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA (0.1 ha)	+++	++	++	+	+?	+?	+?	+?	+?	+	+	?	++	+?	?	?
	NOTES: • waste transfer station (fully enclosed unit) within Abbey Industrial Estate which forms part of Willow Lane SIL; • surrounded by other businesses on the industrial estate including waste management facilities, vehicle repairers and manufacturing industries; • Connect House, converted to residential use via Prior Approval, lies to the south of the site; • access from Wandle Way via a purpose-built access and driveway onto the industrial estate; • located within Archaeological Priority Area; • located in close proximity to areas of MOL and SINC which lie to the east and west; • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk); and • low potential for intensification since throughput per hectare is good (based on the few weeks facility in operation).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and • effective wheel-washing on site • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Evaluating and preserving any archaeological remains • Providing appropriate soft landscaping							
	Type: Transfer+ recycling Waste Accepted: HIC and CD&E Max throughput: 20,000 Licensed capacity: 75,000															
M14 Reston Waste Transfer and Recovery Unit 6, Weir Road, Merton SW19 8UG (0.28 ha)	+++	++	?	?	+?	+?	+?	+?	+?	+?	+?	?	++	+?	?	?
	NOTES: • enclosed three-storey shed and warehouses with outside hardstanding space for vehicles located within Durnsford Road SIL; • Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site; • there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery; • access via Weir Road to strategic road network; • although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; • located within Archaeological Priority Area; • located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) • not located within Air Quality Focus Area or any other environmental designation; • Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and • low potential for intensification (throughput per hectare is good for this type of facility).								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and • effective wheel-washing on site • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Protecting the residential amenity of those properties in the vicinity of the site, especially • with regard to air emissions and noise impacts • Evaluating and preserving any archaeological remains • Not harming biodiversity in the vicinity • Ensuring nearby watercourses are not harmed by the development and Environment • Agency buffer zones are respected • Designing a facility that does not impact on the openness of Metropolitan Open Land; • Providing appropriate softy landscaping							
	Type: Transfer Waste Accepted: C&D Max throughput: 71,595 Licensed capacity: 74,999															

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M15 Riverside AD Facility 43 Willow Lane, Merton CR4 4NA (0.87 ha)	+++	+++	+++	+++	++	+?	+?	++	+?	+	+	?	++	+?	+?	+?

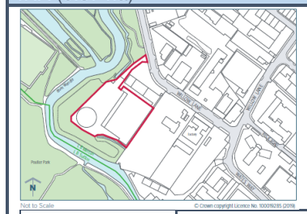


Type	Management (AD)
Waste Accepted	Mixed garden & kitchen waste
Max throughput	36,341
Licensed capacity	99,999

NOTES
- Anaerobic Digestion (AD) facility which takes mixed garden and kitchen waste,;
- the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane);
- comprised of double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste;
- concentration of waste uses within this industrial estate;
- the River Wandle is located adjacent but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site
- vehicle access to the site is provided via an existing route running along the northwest boundary;
- located within Archaeological Priority Area;
- located in close proximity to land designated as MOL, Open Space, a Green Corridor and a SINC which lie to the east and west of Willow Lane SIL. A Conservation Area is located to the north east of the site;
- not located within an Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2.
- low potential for intensification (since the throughput per hectare is good for this type of facility).

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

M16 Riverside Bio Waste Treatment Centre 43 Willow Lane, Merton CR4 4NA (0.87 ha)	+++	+++	+++	+++	++	+?	+?	++	+?	+	+	?	++	+?	+?	+?

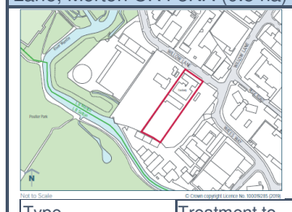


Type	Composting
Waste Accepted	HIC
Max throughput	51,715
Licensed capacity	100,000

NOTES
- enclosed in-vessel composting facility which takes mixed garden and kitchen waste
- the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane);
- there is already concentration of waste uses within this industrial estate;
- the River Wandle is located adjacent but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site;
- vehicle access to the site is provided via an existing route running along the northwest boundary;
- located within Archaeological Priority Area;
- close to MOL, Open Space, a Green Corridor and SINC which lie to the east and west of Willow Lane SIL.
- not located within an Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2; and
- low potential for intensification (since the throughput per hectare is good for this type of facility);

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

M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA (0.5 ha)	+++	+++	+++	+++	++	+?	+?	++	+?	+	+	?	++	+?	+?	+?

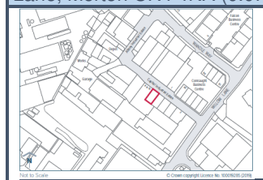


Type	Treatment to produce soil
Waste Accepted	C&D
Max throughput	804
Licensed capacity	75,000

NOTES:
- a large site comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste located within the Willow Lane industrial estate;
- concentration of waste uses within this industrial estate;
- River Wandle lies to the west of the sit but no real potential for transportation of waste by water;
- Connect House, converted to residential use via Prior Approval, lies to the north east of the site
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk);
- high potential for intensification and increasing throughput on the site since it is operating well below its potential as a waste management site.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing;
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
M18 Wandle Waste Management, Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA (0.07 ha)	+?	+?	x	x	?	?	+?	?	?	?	?	?	+	?	x?	?



Type	Transfer
Waste Accepted	Hazardous
Max throughput	141
Licensed capacity	24,999

NOTES:
- double-storey shed located within the Willow Lane industrial estate;
- there is a concentration of waste uses within this industrial estate;
- Connect House, converted to residential use via Prior Approval, lies to the north east of the site
- River Wandle lies to the west of the sit but no real potential for transportation of waste by water;
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 1 (low risk);
- unlikely to be potential for intensification. The throughput on this site is very small and it is not clear what operation takes place on the site as no permission seems to exist for a hazardous waste transfer facility for this site.

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

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: SUTTON

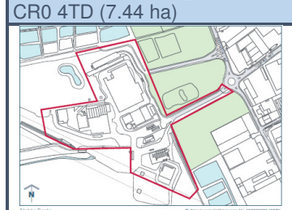
S1 777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TQ (0.97 ha)	+++	+++	+++	+++ (potentially)	++	+?	+?	++	x?	x?	+?	?	+++	+?	+?	+?

Type	Recycling & Reuse
Waste Accepted	HIC and C&D
Max throughput	56,912
Licensed capacity	372,600

NOTES:
- large double-height and triple-height modern industrial sheds and hardstanding for skip storage and parking located within Beddington SIL;
- there is a concentration of waste uses in Beddington SIL. Also located nearby are the Beddington Farmlands EfW facility, the Croydon Transfer Station and a concrete batching operation at 154 Beddington Lane;
- the site backs onto tram lines to the rear;
- HGV access from Coomber Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within Archaeological Priority Area;
- located close to Wandle Valley Regional Park and MOL to the west of Beddington Lane;
- not located within Air Quality Focus Area or within any other environmental designations;
- Flood Zone 1 (low flood risk)
- Potential for intensification

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

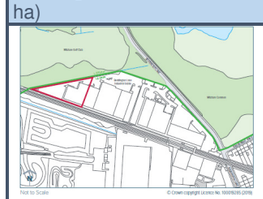
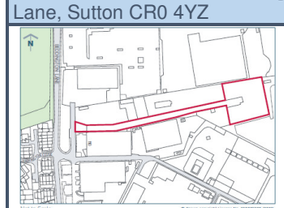
S2 Beddington Farmlands Energy Recovery Facility, Beddington Waste Management Facility, 105 Beddington Lane, Sutton CR0 4TD (7.44 ha)	+++	+++	+++	+++	+++	+	+	++	+?	?	+	?	+++	+?	+?	+?



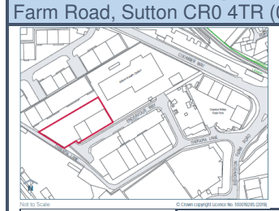
Type	Energy from Waste
Waste Accepted	HIC
Max throughput	275,000
Licensed capacity	302,500

NOTES:
- large energy recovery facility (ERF) located within the boundaries of the Wandle Valley Regional Park, adjacent to Viridor Recycling Facility and Beddington Farm landfill site;
- concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL;
- access from Beddington Lane and the vehicle routing to the site is through Beddington SIL. There is traffic congestion in nearby Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking;
- located within MOL, Metropolitan Green Chain, SINC, Wandle Valley Regional Park and within Archaeological Priority Area;
- not located within Air Quality Focus Area;
- Low flood risk (Flood Zone 1);
- no potential for intensification. This is a new facility and therefore no opportunities to upgrade or intensify.

RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED
- designing the site so that operations are carried out within a fully enclosed building
- ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing
- limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- protecting the amenity of those using the future Wandle Valley Regional Park
- evaluating and preserving any archaeological remains
- not harming biodiversity in the vicinity
- ensuring nearby watercourses are not harmed by the development;
- designing a facility that does not impact on the openness of MOL;
- providing appropriate soft landscaping.

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TD (0.2 ha)	++	++ (potentially)	++ (potentially)	+++ (potentially)	+ (potentially)	+?	+	++	x?	x?	+	+?	+	+?	+?	+?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer Waste Accepted: Hazardous Max throughput: 9,601 Licensed capacity: 75,000	NOTES: • modern double-height industrial units incorporating office space located on the Bedddington Lane industrial estate at the northern end of the Beddington SIL; • there is concentration of waste uses in the Beddington SIL and at the Beddington Waste Management Facility (105 Beddington Lane); • access is from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • located close to MOL, Metropolitan Green Chain, SINC and Wandle Valley Regional Park on the west side of Beddington Lane; • not located within Air Quality Focus Area; • Low flood risk (Flood Zone 1); • some potential for intensification. Throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase this but further investigation on the deliverability will be required.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • Protecting the amenity of those using the future Wandle Valley Regional Park; • Evaluating and preserving any archaeological remains; • Not harming biodiversity in the vicinity.						
S4 Croydon Transfer Station Endeavour Way, Beddington Farm Road, Sutton CR0 4TR (0.74 ha)	++	++ (potentially)	++ (potentially)	+++ (potentially)	+ (potentially)	+?	+	++	x?	x?	+	+?	+	+?	+?	+?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer Waste Accepted: HIC Max throughput: 27,799 Licensed capacity: 75,000	NOTES: • the site lies in Beddington SIL and consists of double- and triple-height enclosed sheds with hardstanding for vehicles; • There is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods; • Access from Endeavour Way There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area; • low flood risk (Flood Zone 1); and • some potential for intensification since the site is operating below the average throughput for this type of facility.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Evaluating and preserving any archaeological remains; and • Providing appropriate soft landscaping.						
S5 Hinton Skips Land to the rear of 112 Beddington Lane, Sutton CR0 4YZ	++	++ (potentially)	++ (potentially)	+++ (potentially)	+ (potentially)	+?	+	++	x?	x?	+	+?	+	+?	+?	+?
 Not to Scale © Crown copyright Licence No. 100019285 (2019) Type: Transfer + treatment of skip waste Waste Accepted: C&D Max throughput: 8,000 Licensed capacity: 75,000	NOTES: • the site lies within Beddington SIL and consists of an enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles; • there is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods; • the site does not have direct frontage onto the Beddington Lane being set back some 400m from the highway at the end of a made up access way that also provides access to a number of other businesses. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • located in close proximity to Archaeological Priority Area Scheduled monument 80m to the west • not located within Air Quality Focus Area or any other environmental designation; • medium flood risk (Flood Zone 2); and • some potential for intensification since the estimated throughput is lower than the average throughput for this type of facility and the planning permission states that up to 50,000 tonnes will be managed on the site.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Developers planning to intensify the safeguarded site should pay particular attention to: • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Minimising flood risk on- and off-site; • Evaluating and preserving any archaeological remains; and • Providing appropriate soft landscaping.						

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the mos efficient use o industrial land	(3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy.	(4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London.	(5) CLIMATE MITIGATION To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities	(8) SUST. DESIGN To promote the highest standards of sustainable design and construction.	(9) SUSTAINBLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) ENVIRON-MENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVER-SITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOY-MENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) HISTORIC TOWNSCAPE & AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve access
S6 Hydro Cleansing, Hill House, Beddington Farm Road CR0 4XB	++	++	++	+?	+	+?	+?	++	x?	x?	+?	+?	++	+?	+?	+?
 Type: Transfer +treatment Waste Accepted: Wastewater/CD&E Max throughput: 13,912 Licensed capacity: 100,000	NOTES: • the site lies within Beddington SIL adjacent to the Surrey Jaguar Centre and the Royal Mail Centre and consists of a two-storey 1960s office block with facility to rear • there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; • access from Beddington Farm Road. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designation; • low flood risk (Flood Zone 1); and • low potential for intensification since the throughput is typical for this type of facility.				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • Designing the site so that operations are carried out within a fully enclosed building; • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • Evaluating and preserving any archaeological remains; and • Providing appropriate soft landscaping.											
S7 Kimpton Park Way Household Reuse and Recycling Centre Kimpton Park Way SM3 9QH (0.44ha)	++	++	++	++	+	+?	+	+	+?	+?	+?	+?	++	+	+?	+?
 Type: CA Site Waste Accepted: HIC Max throughput: 14,799 Licensed capacity: 24,999	NOTES: • open local authority reuse and recycling centre located in the north-west of the Kimpton SIL; • access from the road network via Kimpton Park Way and Minden Road; • located close to Kimpton Linear Park, which is designated as green chain, MOL and SINC; • not located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designations; • good access to strategic road network; • low flood risk (Flood Zone 1); and • low potential for intensification and there are no plans by the South London Waste Partnership to upgrade this site.				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts • protecting the amenity of those using the nearby Kimpton Linear Park • designing a facility that does not impact on the openness of Metropolitan Open Land; and • providing appropriate soft landscaping.											
S8 King Concrete, 124 Beddington Lane, Sutton CR0 4YZ	+++ (potentially)	+++ (potentially)	++ (potentially)	++ (potentially)	+?	+?	+	+	x?	x?	+?	+?	++	+?	+?	+?
 Type: Transfer Waste Accepted: C&D Max throughput: 1,060 Licensed capacity: 74,999	NOTES: • the site lies within Beddington SIL and consists of an open site for concrete production and aggregates recovery; • there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; • access from Beddington Lane and also nearby in Beddington Waste Management Facility, 105 Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designation; • potential for intensification since this site is managing well under the average throughput for this type of facility. The permission states that the facility will recycle 20,000 tpa of CD&E waste on site.				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • developers planning to intensify the safeguarded site should pay particular attention to: • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • evaluating and preserving any archaeological remains • providing appropriate soft landscaping											
S9 Premier Skip Hire Unit 12, Sandiford Road,SM3 9RD (0.1 ha)	++	++	+	+ (potentially)	+ (potentially)	+?	+	+	+?	+?	+	+?	+	+?	+?	+?
 Type: Recycling + transfer Waste: HIC and C&D Max throughput: 12,000 Licensed cap.: 75,000	NOTES: • a two-storey office and warehouse building with hardstanding for skip storage located within the Kimpton SIL; • the site is near to Kimpton household recycling and reuse centre (Site S7 above); • the closest residential properties are 75-100m to the south and west of the site on Hamilton Avenue • good road access to Sandiford Road via Kimpton Road; • located close to SINC (Pyl Brook) to south and west; • not located within Archaeological Priority Area; Air Quality Focus Area or any other environmental designations; • low flood risk (Flood Zone 1); and • low potential for intensification				RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and • providing appropriate soft landscaping.											

	SA FRAMEWORK OBJECTIVES															
	(A)SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
	(1) **NET SELF-SUFFICIENCY** To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) **SPATIAL STRATEGY** To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	(3) **RECYCLING & RECOVERY** To drive waste management up the waste hierarchy.	(4) **CIRCULAR ECONOMY** To promote a transition to a circular economy within south London.	(5) **CLIMATE MITIGATION** To address the causes of climate change by minimising CO_2 emissions from waste facilities	(6) **CLIMATE ADAPTATION** To ensure that all waste management facilities are fully adapted to the impacts of climate change	(7) **FLOOD RISK & SuDS** To avoid, reduce and manage flood risk to or from waste management facilities	(8) **SUST. DESIGN** To promote the highest standards of sustainable design and construction.	(9) **SUSTAINBLE TRANSPORT** To reduce trips, traffic congestion and pollution from waste – related HGV movements	(10) **AIR QUALITY** To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	(11) **ENVIRON-MENTAL PROTECTION** To minimise the adverse impacts during construction & operation of waste facilities	(12) **BIODIVER-SITY AND HABITATS** To protect and enhance biodiversity & habitats	(13) **ECONOMY & EMPLOY-MENT** To promote employment , & competitive-ness of the waste sector in Sth London	(14) **HISTORIC TOWNSCAPE & AMENITY** To minimise adverse impacts on townscape quality and visual amenity	(15) **HEALTH & QUALITY OF LIFE** To minimise adverse on human health and protect the open environment	(16) **EQUALITIES, & SOCIAL INCLUSION** To reduce exclusion, address inequalities & improve access
S10 Raven Recycling Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR (0.25 ha)	+++	+	+?	?	+?	+?	+?	+?	+?	+?	+?	?	+	+?	?	?
	NOTES: • the site lies within Beddington SIL and consists of double-height enclosed sheds with hardstanding for skips; • there is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane which are mostly located away from residential areas; • access from Endeavour Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • not located within Air Quality Focus Area or any other environmental designation; • low flood risk (Flood Zone 1); and • low potential for intensification the throughput per hectare is average for this type of facility.								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building. • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and • providing appropriate soft landscaping.							
Type: Transfer Waste Accepted: HIC and C&D Max throughput: 15,224 Licensed cap.: 74,999																
S11 TGM Environmental 112 Beddington Lane, Sutton CR0 4TD	+	+	+?	?	?	+?	x?	+?	?	?	+?	?	+	?	?	?
	NOTES: • the site occupies the land at the front of 112 Beddington Lane within Beddington SIL and consists of waste paper and waste cardboard recovery and transfer facility comprising a weigh bridge, portacabin offices, parking and areas for sorting and baling (bulking for onward reprocessing of paper and plastic); • Viridor EfW and Beddington Sewage Treatment Works lie to the west. A Wickes DIY & Trade supplies store is located immediately to the north of the application site, and CPI Group a printing and publishing company are located in an industrial unit immediately to the south; • there is a concentration of waste uses in Beddington SIL mostly located away from residential areas. However the closest residential uses are around 40m to the west on the opposite side of Beddington Lane in Harrington Close; • access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area and in close proximity to a Scheduled monument 80m to the west; • not located within Air Quality Focus Area or any other environmental designation; • medium flood risk (Flood Zone 2); and • low potential for intensification. The operation has been relocated from 156 Beddington Lane and the additional space enables baling on site which did not take place on the previous site. The throughput is average								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building; • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing; • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts; • minimising flood risk on- and off-site; • evaluating and preserving any archaeological remains; and • providing appropriate soft landscaping.							
Type: Transfer Waste Accepted: HIC Max throughput: 15,000 Licensed cap.: 15,000																
S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH (2.8 ha)	++	++	+	+ (potentially)	+ (potentially)	+?	+	+	+?	+?	+	+?	+	+?	+?	+?
	NOTES: • the site is currently vacant but the newly permitted development is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring; • there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; • access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; • located within Archaeological Priority Area; • located adjacent to MOL, Metropolitan Green Chain SINC and Wandle Valley Regional Park • not located within Air Quality Focus Area or any other environmental designation; • low flood risk (Flood Zone 1); and • no potential for intensification. The site has only recently been granted planning permission so no increase in the volumes of waste managed is likely to take place								RECOMMENDED MEASUSURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED • designing the site so that operations are carried out within a fully enclosed building • ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts • protecting the amenity of those using the future Wandle Valley Regional Park • evaluating and preserving any archaeological remains • not harming biodiversity in the vicinity • ensuring nearby watercourses are not harmed by the development • designing a facility that does not impact on the openness of Metropolitan Open Land.							
Type: Treatment with transfer Waste Accepted: HIC + C&D Max throughput: Not published yet Licensed cap.: 350,000 tpa																

13 CONCLUSIONS

13.1 This SA Report on the South London Waste Plan (SLWP) Issues and Preferred Options document provides a comprehensive review of current and future waste arisings within the plan area; existing waste management sites, throughput and capacity; national, sub-regional and local policies; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the draft policies and proposed waste sites on each of the sustainability objectives making up the SA Framework.

13.2 The report meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in national planning practice guidance and the SEA regulations respectively, and has been published to inform consultation on the Issues and Preferred Options document from 31 October to 22 December 2019. It is soundly based upon the best available local evidence for each of the four boroughs and draws heavily upon the analysis of current waste sites, throughput, capacity and environmental constraints set out in the South London Technical Paper and Appendices prepared by Anthesis consultants in June 2019.

13.3 It also builds upon the previous SA Scoping Report published in July 2019 by taking account of comments from the Environment Agency, Natural England and Historic England and refining the SA Framework accordingly.

13.4 The SA Matrix in Section 12 demonstrates that draft Policies WP1-WP8, which have been developed by the four partner boroughs as the 'preferred' strategy for the new SLWP for 2021-36 (Option 1), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

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

- promoting **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to meet (but not exceed) the new apportionment over the plan period; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;
- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus

reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;

- minimising **air pollution** and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery** towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

13.6 In due course, stakeholder feedback arising from the issues and preferred options consultation stage will inform the preparation of the SLWP Proposed Submission document which is scheduled for publication in May 2020. This will be accompanied by a further SA Report incorporating a full Equalities Impact Assessment (EqIA).

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