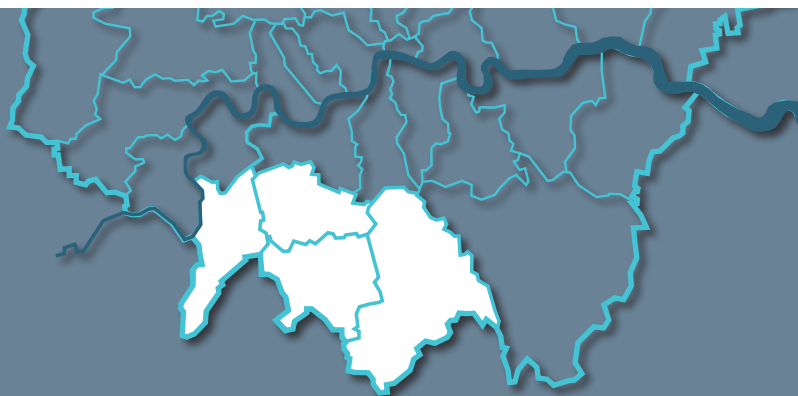


- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London Waste Plan



Sustainability Appraisal (SA)
Addendum Report on Proposed Modifications
incorporating Strategic Environmental Assessment (SEA)

May 2022

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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 2022-37. When it is adopted in 2022-23, the new plan will replace the previous SLWP 2011-21¹ introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the New London Plan 2021 up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy, promote the circular economy and minimise any adverse impacts upon on nearby land uses and the local environment.

1.2 A new plan is needed from 2022 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaborative working at the sub-regional level is essential for effective waste planning.

Stages in the preparation of the draft plan

1.3 Following initial public consultation on Issues and Preferred Options and an accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation²), a draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report³ between 4 September and 22 October 2020 (Regulation 19 consultation⁴). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facilities within the four boroughs over the next 15 years.

1.4 On 19 January 2021, the draft SLWP was submitted to the Secretary of State for Housing, Communities and Local Government for Examination-in-Public (EiP) in line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft plan was accompanied by a number of submission documents, including the SA Report; a Schedule of Main Modifications arising from Regulation 19 consultation; the Sequential Test (flood risk); the Duty to Cooperate Statement; Statement of Consultation, Technical Papers and site appraisals.

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

² under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

³ the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

⁴ under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

1.5 Subsequently, in July 2021, five 'matters statements' were prepared as part of a further submission to the EiP together with a schedule of further proposed changes to the plan in order to address each of the matters, issues and questions (MIQs) previously identified by the Inspector. The matters statements covered the following topics:

- Matter 1: Is the Plan legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been discharged?
- Matter 2: Is the Plan in general conformity with the London Plan?
- Matter 3: Does the Plan make adequate provision for the waste management apportionments required by the London Plan and any other arisings, and is it positively prepared in this regard?
- Matter 4: Does the Plan set out an effective suite of policies for the management of waste in the area; and are they justified and consistent with national policy?
- Matter 5: Does the Plan set out effective mechanisms for its implementation and monitoring?

1.6 An SA Addendum Report on Proposed Modifications⁵ was prepared in July 2021 in order to assess the impacts of each of the proposed modifications to the SLWP (consisting of the Main Modifications submitted to the Inspector in January 2021 and the further proposed changes arising from the Inspector's MIQs as set out in each of the above matters statements). The SA Addendum Report formed part of the above submission to the EiP.

1.7 Following the EiP Hearing into the draft SLWP, which was held at the Merton Council Chamber between 1-2 September 2021, the Inspectors prepared closing remarks on the outcome of the hearings (2 September 2021) and subsequently a post-hearing letter on 7 September 2021⁶ which set out the next steps for preparing and consulting upon the final schedule of Main Modifications.

1.8 Arising from the outcome of the EiP hearing and the Inspectors' recommendations on further changes that may be needed to resolve outstanding issues, the four boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP for public consultation. This shows all material changes made to the draft SLWP compared to the Regulation 19 submission version and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). This SA Addendum Report assesses the likely impact of each of the Main Modifications on the sustainability criteria making up the four Boroughs' SA Framework.

National planning policy requirements

1.9 The National Planning Policy for Waste⁷ (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;

⁵ the SA Addendum Report (Ref: SLWP06) can be viewed at https://drive.google.com/file/d/1L08_94PDI_AaZZ22IU_kwAlXymjZCsbr/view

⁶ the Inspectors' Post-Hearing Letter can be viewed at <https://drive.google.com/file/d/1q8USKHZTGYh4hz6XqdGLDQpQ4kphfKkl/view>

⁷ 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

- 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 1.1: The Waste Hierarchy



Figure 1
The Waste Hierarchy

London Plan Apportionment targets

1.10 The New London Plan⁸, adopted on 2 March 2021, 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.

1.11 New apportionment targets are set for each borough under Policy SI 8 on 'Waste capacity and net waste self-sufficiency' 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.

⁸ the London Plan 2021 is available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Table 1.1: Apportionment targets for South London in the New London Plan 2021

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

1.12 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.

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

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

1.15 To be effective, SA must be

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

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

1.17 At the conclusion of the plan-making process, the SA Report on the Draft SLWP Regulation 19 Submission version together with the SA Addendum Report on Main Modifications (this 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.

SA Scoping Report

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

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

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

SA Report on SLWP Issues and Preferred Options – Reg 18

1.21 Following extensive evidence gathering work, culminating in the production of a Technical Paper⁹ by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report (see above), an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019 (Regulation 18 consultation). Importantly, the Issues and Preferred Options document identified that the four boroughs could meet the combined target for household and C&I waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the C&D waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.

1.22 The Issues and Preferred Options document was accompanied by a further SA Report (incorporating SEA, EqIA and Habitats Regulations screening)¹⁰. Its purpose was to assess the likely effects of the 'preferred option' (consisting of the Vision, eight draft policies and 46 existing waste sites proposed to be safeguarded) and strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework.

1.23 The SA Report concluded that draft Policies WP1-WP8, which were developed by the four partner boroughs as the 'preferred' strategy for the new SLWP (Option 1), would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012

⁹ the South London Waste Technical Paper and accompanying Appendices are available at www.sutton.gov.uk/currentconsultations

¹⁰ the SA Report on SLWP Issues and preferred Options is available at www.sutton.gov.uk/currentconsultations

(Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 were shown to be overwhelmingly negative.

1.24 A total of 1,155 formal responses were received from 57 respondents on the SLWP Issues and Preferred Options Document and the SA Report. Representations received to the SA Report are set out in Appendix 3 of the subsequent SA Report on the Draft SLWP (Proposed Submission) (see below).

SA Report on Draft SLWP (Proposed Submission) – Reg 19

1.25 A draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report¹¹ and Sequential Test (flood risk) between 4 September and 22 October 2020 (Regulation 19 consultation¹²). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facilities within the four boroughs over the next 15 years.

1.26 The accompanying SA Report demonstrates that the ten Policies WP1-WP10 proposed for inclusion in the new SLWP 2021-36 (Option 1), are likely to have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

1.27 While Option 1 essentially carries forward the same overall strategic approach which was identified and assessed as the 'preferred option' in the previous SA Report on Issues and Preferred Options, the SA Matrix demonstrates that the two newly introduced policies (WP8 'Strategic Approach to Other Forms of Waste' and WP10 'Monitoring and Contingencies') and the changes made to Policies WP2 'Strategic Approach to Other Forms of Waste' and WP6 'Sustainable Design and Construction of Waste Facilities' will significantly improve the plan by making a greater contribution to sustainability objectives. Amongst other things, this outcome reflects the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036.

1.28 Overall, the most important sustainability benefits of the draft SLWP Submission Version include:

- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where

¹¹ the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

¹² under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

- 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).

1.29 A total of 115 representations were received from 47 respondents on the Draft SLWP (Proposed Submission) and the SA Report. A schedule of Main Modifications to the plan was prepared in order to address consultation comments as necessary and this was submitted to the government together with the draft plan on 19 January 2021.

SA Addendum Report on Proposed Modifications

1.30 An SA Addendum Report on Proposed Modifications was subsequently prepared in July 2021 in order to assess the likely impacts of each of the Proposed Main Modifications to the draft plan on the environmental, social and economic objectives making up the SA Framework developed for the SLWP. The Proposed Modifications subjected to appraisal consisted of the Main Modifications initially submitted to the Inspector alongside the draft plan on 19 January 2021 (see above) together with the Additional Main Modifications which were proposed subsequently in the light of the Inspector's schedule of matters, issues and questions (MIQs)¹³. The SA Addendum Report on Proposed Modifications was submitted to the Inspector for EiP in July 2021.

¹³ the Inspector's Schedule of Matters, Issues and Questions (INSP03) (April 2021) is available at <https://drive.google.com/file/d/13PYU-TX59iM4GNfTz8hGgQgj6dmqNDu/view>

Final SA Addendum Report on Main Modifications

1.31 Arising from the outcome of the EiP Hearing from 1-2 September 2021 and the Inspectors' recommendations on further changes that may be needed to resolve outstanding SLWP matters and issues, the the four boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP for public consultation. This shows all material changes made to the draft SLWP compared to the Regulation 19 submission version and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). It also has a new number system. This Final SA Addendum Report on Main Modifications has been prepared for final public consultation in order to assess the likely impact of each of the Main Modifications on the sustainability criteria making up the four Boroughs' SA Framework

1.32 This Final SA Addendum Report should be read in conjunction with the previous SA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and the subsequent SA Report on Proposed Modifications (July 2021). It is not therefore considered necessary to repeat the following chapters which are contained within the formefr document:

TWO	Background to the South London Waste Plan
THREE	Current Waste Arisings and Capacity in South London
FOUR	Sustainability Appraisal and Strategic Environmental Assessment
FIVE	Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)
SIX	Baseline (Task A2)
SEVEN	Key Sustainability Issues (Task A3)
EIGHT	The Sustainability Appraisal Framework (Task A4)
NINE	Identifying and Assessing Waste Sites (Task A5)
TEN	Developing Proposed SLWP Policies (Task A5)
ELEVEN	Compatibility of the Vision and Objectives with the SA Framework

1.33 However, the following chapters have been reviewed and amended in this document in order to take account of each of the finalised main modifications to the draft SLWP and to assess their likely impacts on the social, economic and environmental objectives of sustainable development

TWELVE	Appraisal of Main Modifications (Tasks B3, B4 and B5) – see Section 2;
THIRTEEN	Conclusions – see Section 3.

Equalities Impact Assessment (EqIA)

1.34 An Equalities Impact Assessment (EqIA) has been prepared on the Main Modifications in line with the relevant statutory requirements and this is available as a separate document.

2. Final Appraisal of Main Modifications

Appraisal Methodology

2.1 The SA Matrix in Table 2.1 sets out the results of appraisal for each of the Main Modifications to the draft South London Waste Plan (SLWP) as set out in the consolidated Main Modifications Schedule. All proposed changes to the Draft SLWP Proposed Submission, which was published at the Regulation 19 consultation stage on 4 September 2020, are indicated through underlined or ~~crossed out~~ text. As before, the scoring system used to indicate the nature and magnitude of impacts is set out in Figure 2.1 below.

Figure 2.1: Scoring system for use in the appraisal

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

2.2 It should be noted that many of the Main Modifications to the SLWP are factual in nature and do not involve a material change in policy. These are therefore identified as having 'no significant impacts' for the purpose of the appraisal.

2.3 This appraisal addendum must be read in conjunction with the full SA Report on the Draft SLWP (Proposed Submission) – incorporating the Equalities Impact Assessment (EqIUA), the HRA Screening Report and the Sequential Test - which was published for consultation together with the draft SLWP Proposed Submission on 4 September 2020. This previous SA Report – which also formed part of the formal submission to the Inspector on 19 January 2021 – evaluated and compared the likely impacts of the following three strategic alternatives which were initially identified for the management of South London’s waste over the next 15 years from 2021 to 2036:

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

Option 2 (Existing Plan) was further divided, where relevant, into the following two sub-options, both of which would involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036.

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

SUSTAINABILITY APPRAISAL MATRIX FOR MAIN MODIFICATIONS TO THE SOUTH LONDON WASTE PLAN

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
THE SOUTH LONDON WASTE PLAN – WHAT IT IS															
<p>MODIFICATION 1.1 (Post EIP) Para 1.1 First Sentence – page 1 Amend as follows: <i>"The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2024 2022 to 2036 2037."</i></p> <p>NOTES</p> <ul style="list-style-type: none"> To ensure consistency with the NPPF requirement for a 15-year plan period from adoption. 															
<p>MODIFICATION 1 (Post EIP) After Para 1.3 – page 1 Insert: <i>"Community involvement in local planning matters is an essential part of the planning process. Each of the South London Waste Plan Boroughs has an adopted Statement of Community Involvement (SCI), a document which aims to ensure that all sections of the community understand how they are able to contribute to the planning process. When planning applications are submitted to the Boroughs, including applications involving waste uses, community involvement will be sought in accordance with the relevant Boroughs' SCI."</i></p>															
<p>NOTES</p> <ul style="list-style-type: none"> Purpose: To clarify how communities will be involved in future planning applications 															
<p>COMMENTARY</p> <p>By increasing the involvement of the local community as part of the planning process and taking further account of their input and concerns in dealing with waste planning applications, this proposed modification is expected to have:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (16) helping to promote equalities, accessibility and social inclusion within South London. MEDIUM BENEFICIAL IMPACTS (++) for (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities SMALL BENEFICIAL IMPACTS (+) for (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (12) helping to protect and enhance biodiversity and habitats (13) promoting local employment, South London's economy and the competitiveness of the waste sector; 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p>MODIFICATION 2 Para 2.1 Final Sentence – page 3 Amend as follows: “This South London Waste Plan is the replacement document and covers the period 2021 2022 to 2036 2037 and supersedes the 2012 South London Waste Plan. A list of superseded policies is set out in Appendix 5”.</p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To ensure the Plan period is a minimum of 15 years from adoption. To make it clear that the 2012 South London Waste Plan and its Policies is superseded in full. • Inspector’s Preliminary Matter INSP01 • Previously Mod 1 															
No significant impacts – factual change															
<p>MODIFICATION 3 Para 2.11 First Sentence – page 5 Amend third bullet as follows: 95% of construction, demolition and excavation waste to be recycled by 2020 of excavation material to go to beneficial use and 95% of construction and demolition waste for reuse, recycling or recovery. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences, climate change adaptation/mitigation or landfill restoration.</p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To improve clarity and to ensure SLWP wording is consistent with the 2021 London Plan and NPPF • Inspector’s Question M3 [iv] 9. • Previously Mod 1.1. 															
No significant impacts – factual change															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
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KEY ISSUES

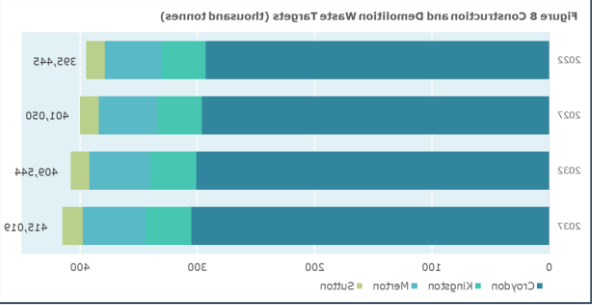
MODIFICATION 4
Para 3.8 First Sentence – page 10
 Amend as follows:
"The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. Similarly, HCI waste sent to the Redhill Landfill site is due to be managed in Beddington, following the planned closure of the landfill in 2027. Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes. However, the Plan identifies sufficient capacity within the plan area to exceed arisings for construction and demolition waste. The Boroughs will continue to monitor cross-boundary movements of waste through the duty to cooperate."

NOTES

- Purpose: To improve clarity on cross-boundary movements of waste and ongoing duty-to-cooperate.
- Inspector’s Question M3 (iv) 7.
- Previously Mod 1.2.

No significant impacts – factual change

SA FRAMEWORK OBJECTIVES																									
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<p>MODIFICATION 5 Para 3.11 - page 12 Amend as follows: <i>The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities <u>outside the South London waste plan area</u> which receive South London waste are able to do so in the future. No planning issues have been identified which will prevent the continued cross-boundary movements of waste and the achievement of this task can be seen in the Statements of Cooperation which accompany this plan. The Boroughs will continue to monitor cross-boundary movements of waste and engage with relevant authorities through the duty to cooperate, so any substantial changes can be considered in accordance with Appendix 1 'Monitoring'.</i></p>																									
++				++				+																	
<p>NOTES</p> <ul style="list-style-type: none"> • Purpose: Duty to Cooperate • Inspector's Question M3 (i) 5. • Previously Mod 1.3 																									
<p>COMMENTARY</p> <p>By emphasising the SLWP boroughs' shared commitment to monitor cross-boundary waste movements and engage with relevant authorities through the 'duty to cooperate', Proposed Modification 1.x is assessed as having:</p> <ul style="list-style-type: none"> • MEDIUM BENEFICIAL IMPACTS (++) for (1) promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) promoting waste re-use, recycling and recovery within South London. and (4) helping to secure the transition to a circular economy; and • SMALL BENEFICIAL IMPACTS (++) for (9) delivering sustainable transport objectives with the plan area; and (10) helping to minimise air pollution and impacts on sensitive land-uses. 																									
<p>MODIFICATION 5.1 (Post EIP) Figure 7 - page 13 Replace Figure 7 with the updated version as follows:</p>																									
<p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF 																									
<p>Figure 7 Household, Commercial & Industrial Waste Targets (thousand tonnes)</p> <table border="1"> <caption>Figure 7 Household, Commercial & Industrial Waste Targets (thousand tonnes)</caption> <thead> <tr> <th>Year</th> <th>Total Target (thousand tonnes)</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>890,800</td> </tr> <tr> <td>2027</td> <td>904,800</td> </tr> <tr> <td>2032</td> <td>918,800</td> </tr> <tr> <td>2037</td> <td>932,800</td> </tr> </tbody> </table> <p style="text-align: center;">No significant impacts – factual change</p>																Year	Total Target (thousand tonnes)	2022	890,800	2027	904,800	2032	918,800	2037	932,800
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<p>MODIFICATION 6 Para 3.16 First Sentence – page 14 <i>"The London Plan sets a target that <u>in London 95% of excavation waste will go to beneficial use and recycle and reuse 95% of construction and demolition waste will be reused, recycled or recovered-95% of Construction and Demolition Waste by 2020.</u>"</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Previously Mod 1.4. • Purpose: To improve clarity and to ensure the wording in the SLWP is consistent with the 2021 London Plan and NPPF. 															
<p>MODIFICATION 6.1 (Post EIP) Figure 8 – page 14 Update Figure 8 as follows:</p>  <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF . 															
<p>VISION AND OBJECTIVES</p> <p>MODIFICATION 7A Para 4.2 – page 19 Amend as follows: <i>"To achieve the vision, the South London Waste Plan has the following objectives, <u>which will be delivered through the policies in the Plan:....</u>"</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: For clarity • Previously Mod 1.4. 															

No significant impacts – factual change

No significant impacts – factual change

No significant impacts – for clarity

	SA FRAMEWORK OBJECTIVES															
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MODIFICATION 7B Para 4.2 – page 19 Amend as follows: <i>"Objective 1: To plan for net self-sufficiently by Meet the 2019 ItP London Plan meeting the 2021 London Plan target for Household and Commercial and industrial waste.</i> • To be delivered through Policies WPAGE 1, WP3 and WP4."	+++	+++	++	++					++	++			++			
NOTES • Purpose: To incorporate the core aim of net self-sufficiency • Inspector's Question M3 (i) 9. • Previously Mod 1.5 pt (a).	COMMENTARY By incorporating the core aim of achieving net self-sufficiency together with meeting the London Plan 2021 combined apportionment targets for the management of Household and Commercial and Industrial (HCI) waste (Objective 1) and for other forms of waste including Construction and Demolition (C&D), excavation, low level radioactive and agricultural waste, Proposed Modification 1.x is assessed as having: <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (1) promoting net self-sufficiency within South London and (2) promoting an environmentally sustainable strategic approach to managing South London's waste arisings); and • MEDIUM BENEFICIAL IMPACTS (++) for (3) promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (9) helping to deliver sustainable transport objectives with the plan area (10) helping to minimise air pollution and impacts on sensitive land-uses; and (13) promoting local employment, South London's economy and the competitiveness of the waste sector 															
MODIFICATION 7C Para 4.2 – page 19 Amend as follows: <i>"Objective 2: To plan for net self-sufficiently by meeting Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural, where practical or necessary.</i> To be delivered through Policies WP2, WP3 and WP4."	+++	+++	++	++					++	++			++			
NOTES • Inspector's Question M3 (i) 9. • Previously Mod 1.5.	COMMENTARY By incorporating the core aim of achieving net self sufficiency together with meeting the London Plan 2021 combined apportionment targets for the management of Household and Commercial and Industrial (HCI) waste (Objective 1) and for other forms of waste including Construction and Demolition (C&D), excavation, low level radioactive and agricultural waste, Proposed Modification 1.x is assessed as having: <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London and (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings); and • MEDIUM BENEFICIAL IMPACTS for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (9) Helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and impacts on sensitive land-uses; and (13) Promoting local employment, South London's economy and the competitiveness of the waste sector 															

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<p>MODIFICATION 7D Para 4.2 – page 19 Amend as follows: <i>"Objective 3: Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan.</i> • <i>To be delivered through Policies WP3 and WP4."</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: For clarity. • Inspector's Question M3 (i) 9. • Previously Mod 1.5b 															
<p>No significant impacts – while the proposed modifications to Objectives 3, 5 and 6 help to identify the relevant policies, they do not have a material effect in terms of the likely impacts of the draft plan</p>															
<p>MODIFICATION 7E Para 4.2 – page 19 Amend: <i>Objective 4: Ensure there is Support the need for sufficient land for other industrial uses within the South London Waste Plan area's industrial estates by not safeguarding more land for waste management than is required.</i> <i>To be delivered through Policies WPAGE 1, WP2, WP3 and WP4.</i></p>															
	++											++			
<p>NOTES</p> <ul style="list-style-type: none"> • Inspector's Question M3 (i) 9. • Previously Mod 1.5c. 															
<p>COMMENTARY</p> <p>By including the aim of not safeguarding more land for waste management than is required as part of Objective 4, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> • MEDIUM BENEFICIAL IMPACTS in terms of (2) promoting an environmentally sustainable strategic approach to managing South London's waste arisings which makes the most efficient use of industrial land; and (13) promoting local employment and South London's economy by ensuring that sufficient land in strategic industrial locations (SILs) and locally significant industrial locations (LSILs) is available for other employment uses 															
<p>MODIFICATION 7G Para 4.2 – page 19 <i>"Objective 6: Ensure the effects of new development are mitigated and, where possible, enhance amenity.</i> • <i>To be delivered through Policies WP4, WP5, WP6, WP8 and WP9"</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: For clarity. • Inspector's Question M3 (i) 9. • Previously Mod 1.5b 															
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MODIFICATION 7H Para 4.2 – page 19 Amend as follows: <i>"Objective 7: To support the movement of waste as far up the waste hierarchy as practicable. To be delivered through Policies WP3 and WP7"</i>	++	++	+++	+++	++				++	++	+		+++	+	+	+
NOTES • Purpose: New objective supporting movement of waste as high up the waste hierarchy as possible • Inspector’s Question M3 (i) 9. • Previously Mod 1.5 (d)	COMMENTARY By including a new SLWP objective supporting the movement of waste as far up the waste hierarchy as practicable, this proposed modification is assessed as having: <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London’s economy and the competitiveness of the waste sector • MEDIUM BENEFICIAL IMPACTS (++) in terms of (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings (5) helping to minimise CO₂ emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area; and (10) helping to minimise air pollution and potential impacts on sensitive land-uses; and • SMALL BENEFICIAL IMPACTS (+) for (11) minimising adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion. 															
MODIFICATION 7I Para 4.2 – page 19 Amend as follows: <i>"Objective 8: To deliver waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy. To be delivered through Policies WPAGE 1, WP2, WP3, WP4, WP5 and WP7"</i>	++	+++	+++	+++	++				++	++	++	+	+++	+	+	+
NOTES • Purpose: New objective aimed at applying the proximity principle, supporting co-location and promoting the Circular Economy • Inspector’s Question M3 (i) 9. • Previously Mod 1.5e.	COMMENTARY By adding a new SLWP Objective aimed at applying the proximity principle, supporting the co-location of facilities and promoting opportunities for the circular economy, this proposed modification is expected to have: <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London’s economy and the competitiveness of the waste sector (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London. • MEDIUM BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London (5) helping to minimise CO₂ emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising adverse impacts arising from construction and operation of waste facilities • SMALL BENEFICIAL IMPACTS (+) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion within South London 															

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MODIFICATION 7J Para 4.2 – page 19 Amend: <i>"Objective 9: To ensure the delivery of sustainable waste development within South London through the integration of social, environmental and economic considerations.</i> • <i>To be delivered through Policies WPAGE 1 to WP9"</i>																																																	
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(1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment	(2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the 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) SUSTAINABLE 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) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness 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
<p>MODIFICATION 9 (Post EIP) Para 4.2 – page 19 Amend as follows:</p> <p><i>"As such, the boroughs will not normally support new waste sites coming forward (outside of sites providing compensatory provision, as set out in Policy WP3), unless there are exceptional circumstances that justify it. This strikes a balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, whilst giving some flexibility for new waste sites to be delivered in appropriate circumstances.</i></p> <p><i>Applications outside of safeguarded waste sites will not be supported unless it can be demonstrate that there is a need for such a facility, having regard to the latest Waste Authority Monitoring Report and the ability of the Plan to meet the London Plan apportionment figure. In addition, applicants will need to provide evidence as to why it is not possible to use, expand or intensify an existing safeguarded waste site (as set out on pages 44-91 of this Plan).</i></p> <p><i>Furthermore, applications proposing waste facilities outside of the existing safeguarded sites will not be supported unless it can be demonstrated that the proposed site would be better suited to meeting the identified need for South London having regard to delivering the vision and objectives of the South London Waste Plan. For example, there may be an opportunity to co-locate a recycling facility with a reprocessing plant or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities.</i></p>															
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MODIFICATION 9 (continued) <i>There may be instances in the future where advances in waste technologies are such that existing sites do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer. In any event, a new waste site will have to satisfy the locational criteria set out in Policy WP4 (b) to (g). The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."</i>															
+	+++	+++	+	+			+	+++	+++	++		++	+++	+++	+++
NOTES • Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective															
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MODIFICATION 10 (Post EIP) Policy WP1 – page 23 Amend Policy WP1 as follows <i>"WP1 Strategic Approach to Household and Commercial and Industrial Waste</i> (a) The boroughs..... (b)the SLWP will seek to meet the 2019 IEP 2021 London Plan apportionment target ...to 2036 2037 (c) The boroughs (d) New waste sites (either for transfer or management) will not normally be permitted, unless: they are for compensatory provision (see WP2): (i) they are for compensatory provision (in accordance with Policy WP4); or (i) there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and (ii) there is robust evidence that existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and (iii) they would manage waste as high up the waste hierarchy as practicable; and (iv) they would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan															
	++	+++	+++	++	+	+	+	+	+++	+++	++	+	+++	+++	+++
NOTES • Purpose: To ensure the policy is consistent with national policy and is justified and positively prepared.															
COMMENTARY By optimising the provision of waste management facilities across the plan area, avoiding the development of additional facilities for HC&I waste outside of safeguarded sites that are not needed to meet the apportionment, and in order, promoting co-location and striking a sustainable balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, this proposed modification is expected to have: <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (2) promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London(9) helping to deliver sustainable transport objectives with the plan area (10) minimising air pollution and potential impacts on sensitive land-uses arising from any new waste facilities outside of safeguarded sites (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London. • MEDIUM BENEFICIAL IMPACTS (++) for(1) promoting net self-sufficiency within South London (4) helping to secure the transition to a circular economy (11) minimising the adverse impacts arising from the construction and operation of new waste facilities, and (13) promoting local employment, South London's economy and the competitiveness of the waste sector. • SMALL BENEFICIAL IMPACTS (+) for (5) minimising CO₂ emissions and address the causes of climate change (6) helping to ensure that any new waste management facilities outside of safeguarded sites are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from any new waste developments outside of safeguarded sites (8) promoting the highest standards of sustainable design and construction in any new waste facilities outside of safeguarded sites (12) helping to protect and enhance biodiversity and habitats 															

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<p>MODIFICATION 10.1 (Post EIP) Figure 14 – page 24 Update Figure 14 as follows:</p> <table border="1"> <thead> <tr> <th>Borough</th> <th>2022 Arisings</th> <th>2037 Arisings</th> </tr> </thead> <tbody> <tr> <td>Croydon</td> <td>293,381</td> <td>305,058</td> </tr> <tr> <td>Kingston</td> <td>37,966</td> <td>39,040</td> </tr> <tr> <td>Merton</td> <td>48,391</td> <td>54,314</td> </tr> <tr> <td>Sutton</td> <td>15,707</td> <td>16,607</td> </tr> <tr> <td>Total</td> <td>395,445</td> <td>415,019</td> </tr> </tbody> </table> <p>NOTES • Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP</p>																Borough	2022 Arisings	2037 Arisings	Croydon	293,381	305,058	Kingston	37,966	39,040	Merton	48,391	54,314	Sutton	15,707	16,607	Total	395,445	415,019
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<p>MODIFICATION 11 Figure 15 – page 24</p> <p>NOTES • Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP.</p>																																	
<p>MODIFICATION 12 (Post EIP) Para 5.17 after last sentence – p26 Add new sentence as follows: <i>"As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify it, as set out in Policy WP2 (e)."</i></p>																																	
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<p>COMMENTARY By not supporting the development of additional waste sites and/or additional capacity to manage low level radioactive waste, this proposed modification is expected to have:</p> <ul style="list-style-type: none"> (VERY) SMALL BENEFICIAL IMPACTS for (2) promoting an environmentally sustainable strategic approach to managing South London’s waste arisings (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment and (15) Helping to minimise potentially adverse effects on human health and the open environment. 																																	

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MODIFICATION 13 (Post EIP) Para 5.18 after last sentence –p 26 Add new sentence as follows: <i>"... Given the relatively small tonnage of this waste, the fact that it can be mixed with C&I Waste and C&D Waste and that it is often dealt with by C&I and C&D waste facilities, there is no need for the SLWP boroughs to provide for this waste stream, <u>unless exceptional circumstances would justify this type of development, as set out in Policy WP2 (e)</u>"</i>															
	+							+	+	+	+		+	+	
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MODIFICATION 14 (Post EIP) Para 5.19 after last sentence p 26 Add new sentence as follows: <i>"As such, the Boroughs will not normally support new sites coming forward unless there are <u>exceptional circumstances that justify them, as set out in Policy WP2 (d)</u>."</i>															
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NOTES • Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective															
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<p>MODIFICATION 14.1 (Post EIP) Figure 16 – page 27 Replace Figure 16 with the updated version below:</p> <p>NOTES</p> <ul style="list-style-type: none"> Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF and to ensure consistency within the SLWP. 																																	
<table border="1"> <thead> <tr> <th>Borough</th> <th>2022 Arisings</th> <th>2037 Arisings</th> </tr> </thead> <tbody> <tr> <td>Croydon</td> <td>9,008</td> <td>9,217</td> </tr> <tr> <td>Kingston</td> <td>2,404</td> <td>2,442</td> </tr> <tr> <td>Merton</td> <td>4,591</td> <td>4,704</td> </tr> <tr> <td>Sutton</td> <td>5,239</td> <td>5,328</td> </tr> <tr> <td>Total</td> <td>21,242</td> <td>21,692</td> </tr> </tbody> </table> <p style="text-align: center;">No significant impacts – factual change</p>																Borough	2022 Arisings	2037 Arisings	Croydon	9,008	9,217	Kingston	2,404	2,442	Merton	4,591	4,704	Sutton	5,239	5,328	Total	21,242	21,692
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<p>MODIFICATION 15 (Post EIP) After Para 5.21 – page 28 Insert new paragraph as follows: <i>"The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."</i></p>																																	
<p>NOTES</p> <ul style="list-style-type: none"> Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective 																																	
<p>COMMENTARY</p> <p>By keeping waste management throughput and capacity under annual review and safeguarding any new waste sites via the Waste AMR, this proposed modification is expected to have:.</p> <ul style="list-style-type: none"> MEDIUM BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings (4) helping to secure the transition to a circular economy (13) promoting local employment, South London’s economy and the competitiveness of the waste sector SMALL BENEFICIAL IMPACTS (+) for (3) promoting waste re-use, recycling and recovery within South London 																																	

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<p>MODIFICATION 16 (Post EIP – partly) Policy WP2 – page 28 Amend Policy WP2 as follows: "WP2 Strategic Approach to Other Forms of Waste (a) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 415,019 tpa within their boundaries across the plan period to 2036 2037. (b) New sites (either transfer or management) will not <u>normally</u> be supported for Construction and Demolition Waste, Radioactive Waste, Agricultural Waste and Hazardous Waste, <u>unless</u>: (i) <u>They are for compensatory provision (in accordance with Policy WP4); or</u> (ii) <u>there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and</u> (iii) <u>there is robust evidence that existing safeguarded sites within the SLWP area are not available or suitable, or that needs cannot be met through the adaption or intensification of existing facilities; and</u> (iv) <u>they would manage waste as high up the waste hierarchy as practicable; and</u> (v) <u>they would accord with all relevant aims and policies of the SLWP (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan.</u> (Former parts (c) and (d) 'renumbered' as parts (d) and (e): Previously Mod 1.6)</p>															
<p>++ ++++ ++++ ++ + + + + +++ ++++ ++ + +++ ++++ ++++</p>															
<p>NOTES</p> <ul style="list-style-type: none"> To ensure the policy is consistent with national policy and is justified and positively prepared. Previously Mod 1.6 (in part) 															
<p>COMMENTARY</p> <p>By optimising the provision of waste management facilities across the plan area, avoiding the development of additional facilities for C&D and other forms of waste outside of safeguarded sites that are not needed to meet the apportionment, and by promoting co-location and striking a sustainable balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, this proposed modification is expected to have:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (2) promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London(9) helping to deliver sustainable transport objectives with the plan area (10) minimising air pollution and potential impacts on sensitive land-uses arising from any new waste facilities outside of safeguarded sites (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and MEDIUM BENEFICIAL IMPACTS (++) for(1) promoting net self-sufficiency within South London (4) helping to secure the transition to a circular economy (11) minimising the adverse impacts arising from the construction and operation of new waste facilities, and (13) promoting local employment, South London's economy and the competitiveness of the waste sector, and (16) helping to promote equalities, accessibility and social inclusion within South London. SMALL BENEFICIAL IMPACTS (+) for (5) minimising CO₂ emissions and address the causes of climate change (6) helping to ensure that any new waste management facilities outside of safeguarded sites are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from any new waste developments outside of safeguarded sites (8) promoting the highest standards of sustainable design and construction in any new waste facilities outside of safeguarded sites (12) helping to protect and enhance biodiversity and habitats 															

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WP3 SAFEGUARDING OF EXISTING WASTE SITES

MODIFICATION 17
Para 5.24 – page 29
 Amend paragraph as follows:
"In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. This includes intensification or redevelopment to provide compensatory provision."

No significant impacts –

This modification has been proposed in order to clarify that the intensification of uses will be allowed not only on safeguarded waste sites, but as part of redevelopment to provide compensatory provision. However this does not constitute a material change in policy.

NOTES

- Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered
- Inspector’s Question M3 (vi) 11.
- Previously Mod 1.7

MODIFICATION 18
Para 5.24 – page 29
 Amend paragraph as follows:
"Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the relevant policies in a borough’s Development Plan."

No significant impacts –

This modification has been proposed for purposes of clarity

NOTES

- Purpose: Contributes to consistency, clarity and/or correct errors
- Inspector’s Question M4 (vii) 1.
- Previously Mod 1.8

SA FRAMEWORK OBJECTIVES															
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<p>MODIFICATION 19 (Post EIP) Para 5.25 Second Sentence and after Para 5.25 – page 29 Add new sentence to end of Para 5.25 and insert new paras as follows: <i>"The 2019 2021 London Plan states "waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed" (paragraph 9.9.2). The Environment Agency's Waste Data Interrogator should be used when assessing the maximum throughput achieved over the last five years.</i> <i>Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for a non-waste use. This could be through the intensification of an existing safeguarded waste site or a compensatory site of a suitable size to meet at least the maximum annual throughput, subject to the requirements of Policy WP4. Boroughs will use conditions or legal agreements to satisfy themselves that compensatory capacity will be delivered before a safeguarded waste site is released to another use.</i></p>															
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<p>MODIFICATION 19 (continued)</p> <p><i>In accordance with Policy SI 9 of the 2021 London Plan compensatory capacity should be provided within London. If it can be demonstrated that there is sufficient capacity in London to meet London's apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses without the provision of compensatory provision.</i></p> <p><i>The evidence base supporting the economic policies in the 2019-2021 London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses.....To help achieve a balance between ensuring there is sufficient waste management capacity in the South London Waste Plan area, whilst not stifling other land uses that are in high demand, compensatory provision from other London Boroughs will not normally be supported, unless the criteria in Policy WP3 can be met."</i></p>															
+++	+++	++	++					+++	+			++			
<p>NOTES</p> <ul style="list-style-type: none"> To ensure the policy is consistent with national policy and is justified and positively prepared. 															
<p>COMMENTARY</p> <p>By ensuring that replacement capacity is secured before permission is granted for a non-waste use while achieving a balance between having sufficient waste management capacity in the plan area, whilst not stifling other land uses that are in high demand (e.g. through intensification of an existing safeguarded waste site or a compensatory site of a suitable size), this proposed modification is expected to have:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (1) promoting net self-sufficiency within South London and (2) promoting an environmentally sustainable strategic approach to managing South London's waste arisings), and (9) helping to deliver sustainable transport objectives with the plan area MEDIUM BENEFICIAL IMPACTS (++) for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (5) helping to minimise CO₂ emissions and address the causes of climate change, and (13) promoting local employment, South London's economy and the competitiveness of the waste sector SMALL BENEFICIAL IMPACTS (+) for(10) Helping to minimise air pollution and potential impacts on sensitive land-uses 															

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<p>MODIFICATION 20 (Post EIP) Policy WP3 – page 30</p> <p><i>"WP3 Existing Waste Sites 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 at least meeting the equivalent of maximum achievable throughput of the site being lost. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Waste AMR and the compensatory sites will be safeguarded for waste uses only.</i></p> <p><i>(d) Compensatory provision for the loss of a waste site from outside the South London Waste Plan area will not normally be permitted, unless there is robust evidence that:</i></p> <p><i>(i) the compensatory provision is required for London to manage its waste sustainably and achieve net self-sufficiency; and</i></p> <p><i>(ii) there are no available or suitable sites within the borough or waste planning area where the waste site will be lost; and</i></p> <p><i>(iii) existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and</i></p> <p><i>(iv) it would manage waste as high up the waste hierarchy as practicable; and</i></p> <p><i>(v) it would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan.</i></p>	++	+++	+++	++				++	++	++			+	+	+

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MODIFICATION 20 (continued) Safeguarding Waste Hierarchy (e) Applications for non-waste uses on safeguarded waste sites that accord with all relevant aims and policies of the South London Waste Plan and the applicable borough's Development Plan, would be supported subject to appropriate conditions or legal agreements that ensure continued operational capacity. (f) Any development on an existing safeguarded waste site, including for compensatory provision, will be required to result in waste being managed at least to the same level in the waste hierarchy"															
NOTES • Purpose: To ensure the policy is consistent with national policy and is justified and positively prepared. • Previously Mod 1.9 (part)															
COMMENTARY By ensuring that compensatory provision for the loss of an existing safeguarded site will at least meet the equivalent of maximum achievable throughput of the site being lost and by discouraging compensatory provision for the loss of a waste site from outside the plan area. this proposed modification is expected to have: • LARGE BENEFICIAL IMPACTS (+++) for (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (3) Promoting waste re-use, recycling and recovery in South London • MEDIUM BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London (4) helping to secure the transition to a circular economy (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities • SMALL BENEFICIAL IMPACTS (+) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment ; and(16) helping to promote equalities, accessibility and social inclusion within South London															
WP4 SITES FOR COMPENSATORY PROVISION															
MODIFICATION 21 (Post EIP) Para 5.28 – page 31 Amend paragraph as follows: "As set out in Policy WP, the The SLWP expects no new sites for waste except where .. required for compensatory provision (or new sites meeting the exceptional circumstances, set out in WPAE 1 and WP2) . The location must be carefully considered."															
No significant impacts – For clarity															

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MODIFICATION 22 Policy WP4 parts (a) and (b) – p31 Amend as follows: "Policy WP4 Proposals for new waste sites <u>or development of existing safeguarded sites</u> to provide compensatory provision should: (a) Demonstrate that the site is capable of providing sufficient compensatory capacity <u>at least the equivalent of maximum achievable throughput of the site being lost.</u> (b) Be Located on sites: (i) <u>Safeguarded for waste, including waste transfer stations, or within Strategic Industrial Locations or Locally Significant Industrial Locations;</u> "																
+++	+++	++	++					++	++	+	+		+	+	+	
NOTES • Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered and how much, and to ensure consistency with the 2021 London Plan and national policy; • Inspector’s Question M2(i) 4; • Previously Mods 1.11a and 1.11b																
COMMENTARY By amending Policy WP4 in order to (a) require proposals for compensatory provision, either on new sites or existing safeguarded sites, to demonstrate that the site is capable of providing at least the equivalent of maximum achievable throughput of the site being lost and (b) ensuring that they are located on sites ‘safeguarded for waste, including waste transfer stations’ or within Strategic Industrial Locations or Locally Significant Industrial Locations, Proposed Modification 22 is expected to have:																
<ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (1) Promoting net self-sufficiency within South London and (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings) • MEDIUM BENEFICIAL IMPACTS (++) for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (9) helping to deliver sustainable transport objectives with the plan area, and (10) Helping to minimise air pollution and potential impacts on sensitive land-use • SMALL BENEFICIAL IMPACTS for (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. 																
MODIFICATION 23 Policy WP4 parts (d)(i) & (v) – p31 "(d) (i) do not result in visually detrimental development conspicuous from <u>strategic open land (eg-Green Belt or MOL);</u> (v) <u>not within the Green Belt or Metropolitan Open Land</u> "																
									+	+	+		+	+	+	+
NOTES • Purpose: clarity and ensure consistency with national policy; • Inspector’s Question M4(i) 3; • Previously Mods 1.12																
COMMENTARY By ensuring that all proposals for compensatory waste provision result in waste being managed at least to the same level in the waste hierarchy as the site being lost, this proposed modification is assessed as having:																
<ul style="list-style-type: none"> • SMALL BENEFICIAL IMPACTS for (10) helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising impacts on the quality of townscape and visual amenity (15) minimising potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion. 																

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
MODIFICATION 24 Policy WP4 parts (f) and (h) – page 31 Amend as follows: <i>"(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost.</i> <i>(h) Meet the other policies of the relevant borough's Development Plan."</i>															
++	++	+++	+++	++				++	++	+		+++	+	+	+
NOTES <ul style="list-style-type: none"> Purpose: To ensure consistency with London Plan policy; in response to Inspector's Question M2(i); and Previously Mods 1.13 By ensuring that all proposals for compensatory waste provision result in waste being managed at least to the same level in the waste hierarchy as the site being lost, this proposed modification is assessed as having: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London's economy and the competitiveness of the waste sector MEDIUM BENEFICIAL IMPACTS in terms of (1) Promoting net self-sufficiency (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (5) minimising CO₂ emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area; and (10) helping to minimise air pollution and potential impacts on sensitive land-uses; and SMALL BENEFICIAL IMPACTS for (11) minimising impacts from construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) minimising potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion 															
MODIFICATION 25 Policy WP4 – page 31 Consolidated changes to Policy WP4 for reference: (see above)															
See respective appraisal outcomes for Modifications 22, 23 and 24 above															
WP5 PROTECTING AND ENHANCING AMENITY															
MODIFICATION 26 Policy WP5 part (a) – page 33 (a) Developments for compensatory or intensified waste facilities should contribute positively to the character and quality of the area and ensure that any potential adverse impacts of the development are designed and managed to mitigate any achieve levels that will not significantly adversely affect are appropriately mitigated.															
				+	++	+	++	+	+	+	++		+++	+++	+++
NOTES <ul style="list-style-type: none"> Purpose: To ensure consistency with national policy; in response to Inspector's Question M4(i) 6; and Previously Mods 1.14 By including a furtherrequirement for developments for compensatory or intensified waste facilities to contribute positively to the character and quality of the area, this proposed modification is assessed as having: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London. MEDIUM BENEFICIAL IMPACTS (++) for (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities; and (12) helping to protect and enhance biodiversity and habitats. SMALL BENEFICIAL IMPACTS (+) for (5) helping to minimise CO₂ emissions and address the causes of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising impacts arising from construction and operation 															

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 & EMPLOYMENT To promote employment , & competitive-ness of the waste sector in Sth London	(14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity	(15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment	(16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve
<p>MODIFICATION 27 WP5 pts (c)(iii) & (c)(iv) p33 "Policy WP5 (c) (iii) <i>Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals, and residential areas. Heritage Assets and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</i> (iv) <i>sensitive receptors, such as schools, hospitals and residential areas;</i>"</p>															
<p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To ensure consistency with national policy; • in response to Inspector's Question M4(i) 5; and • Previously Mods 1.15 															
<p>COMMENTARY By strengthening Policy WP5 to ensure that all waste proposals have particular regard to conserving and where practicable, enhancing those elements which contribute to their significance, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment; and • MEDIUM BENEFICIAL IMPACTS (++) for (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. 															
										++			+++	++	++

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
MODIFICATION 28 Policy WP5 part (c)(v) – page 33 Amend as follows: <i>"Policy WP5</i> <i>(c) (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</i> <i>(c) (v) Air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances; potential impacts within Air Quality Focus Areas, Air Quality Management Areas and/or the Mayor's expanded Ultra Low Emission Zone (ULEZ); cumulative impacts with other waste sites; the London Plan requirement for development proposals to be at least 'Air Quality Neutral'; and the use of design solutions to prevent or minimise increased exposure of people and in particular vulnerable individuals to poor air quality."</i>															
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NOTES <ul style="list-style-type: none"> Purpose: To improve clarity over air quality requirements and ensure consistency with national policy; Previously Mods 1.16 															
COMMENTARY By providing details of the full range of air quality considerations that must be taken into account for all new or intensified waste developments, including vehicle movements, national air quality objectives, the Mayor's ULEZ; cumulative impacts with other waste sites and the London Plan requirement for 'Air Quality Neutrality', this proposed modification is assessed as having: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (4) helping to secure the transition to a circular economy (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. MEDIUM BENEFICIAL IMPACTS (++) for (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (5) helping to minimise CO₂ emissions and address the causes of climate change; and (12) helping to protect and enhance biodiversity and habitats. 															

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) SUSTAINABLE 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) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities	(12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats	(13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness 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
MODIFICATION 29 Policy WP5 (vii), (viii) & (ix) – p 33 <i>(vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;</i> <i>(viii) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials</i> <i>(viii) (ix) The safety and security of the site."</i>															
				+				+++	+++	++			+++	+++	+++
NOTES • Purpose: To strengthen the links between the Plan policies and the monitoring framework. • in response to Inspector's Question M4(i) 4; and • Previously Mods 1.17 By providing details of the full range of air quality considerations that must be taken into account for all new or intensified waste developments, including vehicle movements, national air quality objectives, the Mayor's ULEZ; cumulative impacts with other waste sites and the London Plan requirement for 'Air Quality Neutrality', this proposed modification is assessed as having: • LARGE BENEFICIAL IMPACTS (+++) for (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment ; and (16) helping to promote equalities, accessibility and social inclusion within South London • MEDIUM BENEFICIAL IMPACTS (++) for (11) minimising the adverse impacts arising from the construction and operation of waste facilities • SMALL BENEFICIAL EFFECTS (+) for (5) helping to minimise CO ₂ emissions and address the causes of climate change															
MODIFICATION 30 Policy WP5 final sentence – p 33 Amend as follows: <i>"The information in the schedule below will provide the basis for the assessment of the impact of a development and should therefore be considered as part of any pre-application engagement."</i>															
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NOTES • Purpose: To strengthen the links between the Plan policies and the monitoring framework; • in response to Inspector's Question M4(i) 13; and • Previously Mods 1.18. COMMENTARY By ensuring that all supporting information referred to in the Schedule attached to Policy WP5 is considered at an early stage in the design process through pre-application engagement, this proposed modification is assessed as having: • LARGE BENEFICIAL IMPACTS (++) for (5) helping to minimise CO ₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment ; and (16) helping to promote equalities, accessibility and social inclusion within South London															
MODIFICATION 31 Policy WP5 – p33 Consolidated changes to WP5 See respective appraisal outcomes for Modifications 26, 27, 28 and 29 above															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p>MODIFICATION 32 Policy WP5 Schedule part 22 – page 34 22. Air Quality Impact Assessment, demonstrating setting out the effects on air quality in the locality of the <u>proposed development site</u> arising from <u>approved construction works, on-site waste operations and associated vehicle movements, the operation of the site and vehicles movement to and from it.</u> In line with London Plan Policy SI 1 on 'Improving Air Quality' and the relevant Local Plan policies, Air Quality Assessments must demonstrate that proposed developments:</p> <ul style="list-style-type: none"> are at least 'Air Quality Neutral' having regard to the latest available Mayoral guidance on neutral and air quality positive approaches; promote opportunities to deliver further improvements to air quality and do not conflict with ongoing London-wide or borough level activities aimed at reducing air pollution do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; delay the date at which compliance will be achieved in areas that are currently in exceedance of national air quality objectives; or create an unacceptable risk of high ... exposure to poor air quality; have assessed the cumulative impacts of multiple air pollution sources from the new development, for example, the on-site waste operations and associated vehicle movements, in combination with similar a pollution impacts from approved and proposed development, as advised by the council's Air Quality Officer; incorporate design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, including, but not limited to, children, people in poor health and the elderly; and incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions. 															
	++		+++	++				+++	+++	+++	++			+++	+++
<p>NOTES</p> <ul style="list-style-type: none"> Purpose: To improve clarity over air quality requirements, ensure consistency with national policy and strengthen links to the monitoring framework; and Previously Mod 1.19 															
<p>COMMENTARY</p> <p>By providing further details of the content and minimum requirements of Air Quality Assessments, on air quality neutrality, potential conflict with borough or Mayoral activities, avoiding the creation of new areas that exceed national air quality objectives, incorporating design solutions to prevent or minimise exposure for vulnerable groups; and the need to-incorporate arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (9) helping to deliver sustainable transport objectives (10) minimising air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion. MEDIUM BENEFICIAL IMPACTS (+) for (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (5) helping to minimise CO₂ emissions and address the causes of climate change; and (12) helping to protect and enhance biodiversity and habitats 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
<p>MODIFICATION 33 Policy WP5 Schedule pts 30-35 – p 34 • 30 Measures for protecting Public Rights of Way • 31 Transport Assessment, which may address measures such as highway safety, protecting Public Rights of Way and an access strategy • 32 Travel Plan-Transport Management Strategies such as a Delivery Servicing Plan/Freight Plan, a Route Management Strategy, a Construction Logistics Plan and a Travel Plan. • 32 Route Management Strategy • 33 Access Strategy • 34 Delivery Servicing Plan/Freight Plan • 35 Construction Logistics Plan • 36 Highway safety measures</p> <p>NOTES • Purpose: To improve the clarity of the SLWP • Inspector’s Question M4 (i) 11; and • Previously Mod 1.20</p>															
<p>No significant impacts – This modification does not constitute a material change in policy</p>															
<p>POLICY WP6: SUSTAINABLE CONSTRUCTION AND DESIGN OF WASTE FACILITIES</p>															
<p>MODIFICATION 34 (Post EIP) Para 5.36 – page 36 Amend paragraph as follows: <i>"5.36-In responding to the 'climate emergency' and the transition to a zero carbon economy within the South London Waste Plan area, all proposed waste facility developments should seek to achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials. As a minimum, all major waste proposals will be required to deliver net zero carbon standards in line with London Plan Policy S12 through application of the Mayor's energy hierarchy: (continued overleaf)</i></p>															
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SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
MODIFICATION 34 (continued) <i>(i) be lean: use less energy and manage demand during operation (ii) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly (iii) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site (iv) be seen: monitor, verify and report on energy performance. A minimum 35% reduction beyond Part L 2013 must be achieved on site for both major and minor proposals. Any shortfall in emissions reductions must then be addressed through a financial contribution to the relevant borough's carbon offset fund.</i> "A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation." "Designing Waste Facilities – A Guide to Modern Design in Waste" (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy 512 of the 2020 London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change															
		+++	+++	+++	+++	+++	+++	+++	+++	+++	++	+	+	+++	+++
NOTES <ul style="list-style-type: none"> • Post Examination Modification; • Purpose: To improve clarity and ensure consistency with London Plan policy 															
COMMENTARY By ensuring that waste developments achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials, this proposed modification is expected to have: <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (5) helping to minimise CO₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. • MEDIUM BENEFICIAL IMPACTS (++) for (12) helping to protect and enhance biodiversity and habitats • SMALL BENEFICIAL IMPACTS (+) (13) promoting local employment, South London's economy and the competitiveness of the waste sector and (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
MODIFICATION 35 Para 5.38 – page 36 Insert new paragraph after 5.38 <i>"Developers will have to provide justified costs for their proposals to demonstrate why the 'Excellent' rating would make their proposal unviable. The details of the costs to be provided should ideally be agreed with the relevant local authority as part of pre-application engagement."</i>															
				++					++	++				++	
NOTES <ul style="list-style-type: none"> Purpose: To improve the clarity of the SLWP; Previously Mods 1.22 															
COMMENTARY This proposed modification is assessed as having: <ul style="list-style-type: none"> MEDIUM BENEFICIAL IMPACTS (++) for (5) minimising CO₂ emissions and addressing the causes of climate change (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; 															
MODIFICATION 36 (Post EIP) Para 5.39 – page 36 Amend as follows: <i>"As well as addressing the causes of climate change, waste proposals must be fully adapted to the future impacts of climate change through the following measures:</i> <ul style="list-style-type: none"> <i>Heating, Cooling and Energy Use Overheating and cooling. Addressing summer overheating and the urban heat island (UHI) effect by incorporating green infrastructure as part of the design and layout in line with the Mayor's minimum 'urban greening factor' standards in London Plan Policy G6 (or the equivalent standards set out at borough level).</i> <i>"Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities – A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise.</i> 															
					+++	+++	+++		++	+++	++		+	+++	+++

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
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MODIFICATION 36 (continued) <ul style="list-style-type: none"> <i>Flood Risk. Dealing with the increased frequency and severity of storm events resulting from climate change by incorporating sustainable urban design (SuDS) measures such as filter strips, permeable paving soakaways and green roofs as part of the design and layout. All waste proposals must achieve greenfield run off rates and volumes in the 1 in 100 year storm event plus climate change in line with part B of London Plan Policy SI 13: Flood Readiness. Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas.</i> <i>Odours. Dealing with odour issues which are exacerbated with higher temperatures by avoiding the use of unenclosed waste facilities will become particularly vulnerable to odour issues.</i> 															
					+++	+++	+++		++	+++	++		+	+++	+++
NOTES <ul style="list-style-type: none"> Post Examination Modification; Purpose: To improve clarity and ensure consistency with London Plan policy 															
COMMENTARY <p>By ensuring that waste developments achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials, this proposed modification is expected to have:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. MEDIUM BENEFICIAL IMPACTS (++) for (10) Helping to minimise air pollution and potential impacts on sensitive land-uses and (12) helping to protect and enhance biodiversity and habitats SMALL BENEFICIAL IMPACTS (+) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															

SA FRAMEWORK OBJECTIVES															
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(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINBLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRON-MENTAL PROTECTION	(12) BIODIVER-SITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
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<p>MODIFICATION 37 Para 5.41 (now 5.42) – page 36 Amend as follows: <i>"5.41 5.42 Therefore in accordance with national and regional advice, the 201921 LPP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:"</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To improve clarity and consistency with London Plan • Previously Mod.1.24 															
<p style="text-align: center;">No significant impacts – This modification does not constitute a material change in policy</p>															
<p>MODIFICATION 38 Para 5.40 First Sentence – p37 Amend as follows: <i>"In the construction phase of any development, consideration should be given to Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. <u>It is also an opportunity to promote and contribute towards the London Plan target of 95% of excavation material going to beneficial use and 95% of construction and demolition waste being reused, recycled or recovered.</u>"</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To improve clarity and to ensure SLWP is consistent with the London Plan and NPPF • Previously Mod.1.26 															
<p style="text-align: center;">No significant impacts – This modification is factual and does not constitute a material change in policy</p>															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
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MODIFICATION 39 Policy WP6 part (b) – page 37 (b) Waste facilities will be required to: (v) minimise waste and promote sustainable management of construction waste the beneficial use of excavation waste and the reuse, recycling or recovery of construction and demolition waste on site; and															
<div style="display: flex; justify-content: space-between;"> ++++ ++++ ++++ ++++ ++++ ++++ </div>															
NOTES <ul style="list-style-type: none"> Purpose: To improve clarity and ensure the SLWP is consistent with the 2021 London Plan and NPPF Previously Mod.1.27 															
COMMENTARY This proposed modification is assessed as having: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; and (13) promoting local employment, South London’s economy and the competitiveness of the waste sector (5) helping to minimise CO₂ emissions and address the causes of climate change and (13)) promoting local employment, South London’s economy and the competitiveness of the waste sector 															

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POLICY WP7: THE BENEFITS OF WASTE															
<p>MODIFICATION 40 (Post EIP) Para 5.44 last sentence – page 38 Amend as follows: <i>"Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted. Notwithstanding this, the Mayor's London Plan sets out a number of benefits from waste that should be encouraged when development proposals are brought forward. Therefore, in accordance with London Plan Policy SI 8 Part D, the South London Waste Plan Boroughs will support schemes that also propose additional benefits alongside waste operations."</i></p>															
+++	+++	+++	+++	+++			+++		++			+++		+	+
<p>NOTES</p> <ul style="list-style-type: none"> • Post Examination Modification • Purpose: To improve clarity and ensure consistency with London Plan policy 															
<p>COMMENTARY</p> <p>By encouraging waste proposals which deliver a range of benefits for the circular economy, reducing life-cycle carbon impacts and other environmental sustainability objectives, such as delivering complementary waste management and secondary material processing facilities on a single site; support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets; and contributing towards renewable/ efficient energy generation, this modification is expected to have:</p> <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (5) helping to minimise CO₂ emissions and address the causes of climate change (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities, and (13) promoting local employment, South London's economy and the competitiveness of the waste sector • MEDIUM BENEFICIAL IMPACTS (++) for (10) Helping to minimise air pollution and potential impacts on sensitive land-uses • SMALL BENEFICIAL IMPACTS (+) for (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion within South London. 															

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<p>MODIFICATION 41 (Post EIP) Policy WP7 – page 38 Amend as follows:</p> <p><i>"WP7 The Benefits of Waste</i> Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.</p> <p><i>Waste development for additional Energy from Waste facilities will not that can deliver additional benefits, as set out in London Plan Policy SI 8 Part D, Points 3 and 4, will be supported encouraged.</i></p> <p><i>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.</i></p>															
+++	+++	+++	+++	+++			+++		++			+++		+	+
<p>NOTES</p> <ul style="list-style-type: none"> • Post Examination Modification • Purpose: To improve clarity and ensure consistency with London Plan policy. 															
<p>COMMENTARY</p> <p>By encouraging waste proposals which deliver a range of benefits for the circular economy, reducing life-cycle carbon impacts and other environmental sustainability objectives, such as delivering complementary waste management and secondary material processing facilities on a single site; support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets; and contributing towards renewable/ efficient energy generation, this modification is expected to have:</p> <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy (5) helping to minimise CO₂ emissions and address the causes of climate change (8) promoting the highest standards of sustainable design and construction in new or upgraded waste facilities, and (13) promoting local employment, South London’s economy and the competitiveness of the waste sector • MEDIUM BENEFICIAL IMPACTS (++) for (10) Helping to minimise air pollution and potential impacts on sensitive land-uses • SMALL BENEFICIAL IMPACTS (+) for (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) promoting equalities, accessibility and social inclusion in South London. 															

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POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES															
<p>MODIFICATION 42 Policy WP8 – page 39 Amend as follows: "WP8 New Development Affecting Waste Sites <i>New development should be designed to ensure that existing, <u>consented or safeguarded</u> waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.</i> <i>Where new development is proposed that may be affected by an existing, <u>consented or safeguarded</u> waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:</i> (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision; (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligation; (iii) Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust."</p>															
<div style="display: flex; justify-content: space-around;"> ++ ++ +++ +++ +++ ++ </div>															
<p>NOTES</p> <ul style="list-style-type: none"> Purpose: To improve clarity and consistency within the SLWP Previously Mod.2 (with minor changes) 															
<p>COMMENTARY</p> <p>By requiring early engagement with waste site operators in cases where new development is proposed that may be affected by an existing, consented or safeguarded waste site in order to gain a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (10) minimising air pollution and potential impacts on sensitive land-uses from existing waste sites (11) minimising the adverse impacts arising from the operation of existing waste facilities (15) minimising the potential adverse effects on human health arising from the operation of existing waste. MEDIUM BENEFICIAL IMPACTS (++) for (1) promoting net self-sufficiency within South London (8) promoting the highest standards of sustainable design and construction in new developments in the vicinity of existing waste sites; and (16) helping to promote equalities, accessibility and social inclusion. 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
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POLICY WP9: PLANNING OBLIGATIONS															
MODIFICATION 43															
Para 5.52 – page 40															
Amend examples as follows:															
<ul style="list-style-type: none"> <i>"Transport Management Strategies, that include Delivery and Servicing Plans that incorporate measures to: manage traffic routes to the site Traffic management measures, including the routing of vehicles; supporting staff to travel sustainably; ensure improving road safety; reducing reduce freight traffic, particularly at peak times, facilitate a transition to low emission vehicles and a monitoring regime.</i> <i>off-site post implementation monitoring of emissions and reporting of impacts upon the water environment, particularly for new or intensified waste sites adjacent to main rivers or other watercourses</i> <i>post implementation monitoring and annual reporting of local air quality and polluting emissions from both on-site waste operations and associated HGV movements in the vicinity of new or intensified waste sites against national air quality objectives and any relevant emissions limits set as part of the planning permission and/or waste license"</i> 															
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NOTES															
COMMENTARY															
<p>This proposed modification is assessed as having:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities ((15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London. MEDIUM BENEFICIAL IMPACTS for (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) promoting the highest standards of sustainable design and construction SMALL BENEFICIAL IMPACTS for(5) helping to minimise CO₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
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POLICY WP9: PLANNING OBLIGATIONS															
<p>MODIFICATION 44 Policy WP9 – page 40 Amend as follows: <i>"Policy WP9 Planning Obligations Planning obligations will be used to ensure that all new Waste development or waste redevelopment must ensure that where these have off-site impacts, these are addressed to make the development acceptable provide that these are mitigated 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."</i></p> <p style="text-align: center;">No significant impacts – Clarification of the approach to planning obligations as set out in planning legislation and national policy</p> <p>NOTES • Purpose: consistency with NPPF • Previously Mod.2.1</p>															
POLICY WP10 MONITORING AND CONTINGENCIES															
<p>MODIFICATION 45 Para 5.54– page 41 <i>"The South London Waste Plan boroughs recognise that on-going plan monitoring and review are essential to:</i> • <i>delivering objectives of the plan;</i> • <i>assessing the implementation of the strategic policies;</i> • <i>analysing the effectiveness of policies; and</i> • <i>analysing waste planning permissions and compliance with planning conditions and obligations."</i></p>															
<div style="background-color: #4F81BD; color: white; padding: 10px; display: flex; justify-content: space-around;"> +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ +++ </div>															
<p>NOTES • Purpose: To improve clarity around monitoring and to ensure consistency with national policy • Previously Mod.1.28a</p> <p>COMMENTARY By ensuring compliance with conditions, this proposed modification is assessed as having: • LARGE BENEFICIAL IMPACTS (+++) for (5) helping to minimise CO₂ emissions and address the causes of climate change (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London</p>															

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MODIFICATION 46 (Post EIP) After Para 5.57 – page 41 <i>"The South London Waste Plan boroughs will engage with all relevant Duty to Cooperate stakeholders on an ongoing basis in a constructive, an active and an ongoing basis on any relevant strategic matters. A lead borough shall be nominated to carry out this responsibility as and when required."</i>															
+++	+++	+++	+++	+	+	+	+	+	+++	+	+		+	+	+
NOTES • Purpose: To improve the clarity of the SLWP and to make clear the Plan's ongoing commitment to DtC By ensuring that the SLWP boroughs work with each other and with all other relevant 'duty to cooperate' bodies to monitor the plan and the copordinate ant necessary contingency actions to ensure that the plan's strategic objectives, policies and targets are met, this proposed modification is assessed as having potentially: • LARGE BENEFICIAL IMPACTS (+++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) securing the transition to a circular economy and (10) Helping to minimise air pollution and potential impacts on sensitive land-uses • MEDIUM BENEFICIAL IMPACTS (++) for helping to minimise air pollution and potential impacts on sensitive land-uses • SMALL BENEFICIAL IMPACTS (+) for (5) helping to minimise CO ₂ emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives with the plan area (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment ; and(16) helping to promote equalities, accessibility and social inclusion .															
MODIFICATION 47 (Post EIP) Para 5.59 First Sentence – p41 Insert new paragraphs after 5.58 <i>"In addition to monitoring the implementation of the Plan, it is equally important to ensure the performance of operational waste sites is monitored too. This is the responsibility of a number of parties, namely: The South London Waste Plan Boroughs, the Environment Agency and waste site operators.</i> <i>The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit.</i> <i>"Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). The responsibility for checking compliance falls to the issuer of the permit (the regulator).</i>															
				+	+	+	+	+++	+++	+++	+		+		

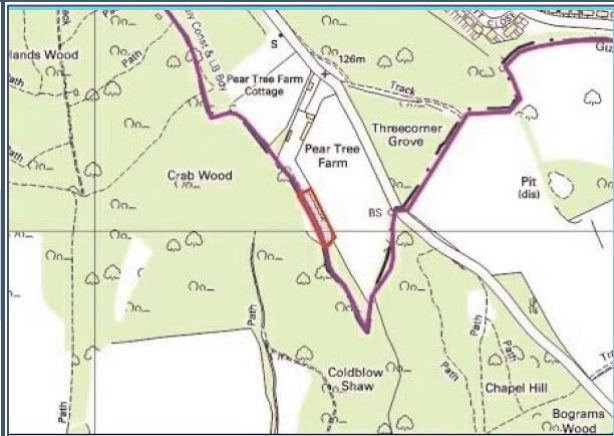
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<p>MODIFICATION 47 (continued) ...Regulations are the basis for any enforcement action and the principal offences are: • <u>operating [without] a permit;</u> • <u>causing or knowingly permitting a water discharge activity or groundwater activity without a permit;</u> • <u>The Environmental Permitting failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.</u> Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health. The SLWP Boroughs will monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the Waste AMR. Any additional information on enforcement action can be requested from the regulator. In addition, planning legislation gives powers to local authorities to take enforcement action where development has been carried out, either: without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not been delivered. As such, the South London Waste Boroughs' individual Planning Enforcement teams will investigate alleged planning breaches related to waste developments within their respective boroughs. When considering what action to take, if necessary, the Boroughs will have regard to national planning policy and guidance, and any relevant legislation..</p>															
				+	+	+	+	+++	+++	+++	+		+	+++	+++
<p>NOTES</p> <ul style="list-style-type: none"> • Post Examination Modification • Purpose: To improve clarity of the SLWP with regards to the different stakeholders involved in monitoring and what their roles are 															
<p>COMMENTARY</p> <p>By clarifying the respective roles and responsibilities of the SLWP Boroughs, the EA and waste site operators in terms of monitoring and reporting on breaches of planning obligations, enforcement notices and/or waste permitting conditions this proposed modification is expected to have:</p> <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (+++) for (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) minimising potentially adverse effects on human health and the open environment; and (16) promoting equalities, accessibility and social inclusion within South London. • SMALL BENEFICIAL IMPACTS (+) for (5) helping to minimise CO₂ emissions and address the causes of climate change (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (12) helping to protect and enhance biodiversity and habitats, and (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															

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<p>MODIFICATION 48 Policy WP10 – page 41 Amend as follows: <i>"Policy WP10</i> <i>The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report (AMR) will report on the outcome of plan the monitoring and the boroughs, in consultation with each other and with other relevant Duty to Cooperate bodies as appropriate, such as the GLA, LWARB, EA, the South London Waste Partnership and the waste management industry, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring."</i></p>															
+++												+++			
<p>NOTES</p> <ul style="list-style-type: none"> Purpose: To improve the clarity of the SLWP with regards to those stakeholders likely to be engaged in DtC and contribute towards the monitoring of the Plan Previously Mod 2.2 															
<p>COMMENTARY</p> <p>By ensuring that the SLWP boroughs work with each other and with all other relevant 'duty to cooperate' bodies to monitor the plan and the coordinate any necessary contingency actions to ensure that the plan's strategic objectives, policies and targets are met, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy; for (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities and (13) promoting local employment, South London's economy and the competitiveness of the waste sector. 															

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<p>MODIFICATION 49 How to read the information on Safeguarded Sites – page 43 Under 'Maximum throughput (in tonnes per annum)'- amend as follows: <i>"The maximum throughput achieved by the site in any one year between 2013 and 2017 in the last five year period, using the latest available information from the Environment Agency Waste Data Interrogator. The 2019-ItP 2021 London Plan recommends that boroughs should use this measure to assess capacity."</i></p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To improve the clarity and consistency of the SWLP and to ensure the latest London Plan is referenced; • Previously Mod.1.25 															
<p>MODIFICATION 50 (Post EIP) Sites and figures – pages 44 to 91 Update figures in accordance with the Figures set out in the updated Appendix 2 in Annex 1 to the Modifications Schedule.</p> <p>NOTES</p> <ul style="list-style-type: none"> • Purpose: So the SLWP reflects the latest available data at the time of the hearings. 															
<p>No significant impacts – This modification does not constitute a material change in policy</p>															
<p>No significant impacts – This modification is factual and does not constitute a material change in policy</p>															

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<p>MODIFICATIONS 52 AND 70 'Opportunity to increase waste managed' - Delete sentence: <i>"There are no plans by the South London Waste Partnership to intensify operations at this site."</i> MODIFICATION 52: Site C5a, p 46 MODIFICATION 70: Site K4, p 59</p> <p>NOTES</p> <ul style="list-style-type: none"> Purpose: Contributes to consistency, clarity and updates with the latest information in response to Con25/Rep 90 from South London Waste Partnership: Previously Mods 3 and 4. 															
No significant impacts – factual change															
<p>MODIFICATIONS 57 and 115 Add the Tier number to the archaeological consideration: <i>"Evaluating and preserving any archaeological remains (Tier 4)"</i> MODIFICATION 57: Site C7 – p 49 MODIFICATION 115: Site S10–p 89</p>															
<p>• Purpose: To improve clarity and ensure consistency across safeguarded sites in the SLWP. • Inspector's Question M4 [vi] 2c • Previously Mod 12.9</p> <p>By adding a new requirement to evaluate and preserve any archaeological remains in the list of 'issues to consider' for Site S10, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) terms of (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															
<p>MODIFICATION 58 Site C8: Issues to consider – p 50 <i>Conserving, and where possible enhancing, Ensuring the preservation or enhancement of the setting and significance of Airport House, a Grade II* Listed building opposite</i></p>															
<p>NOTES</p> <ul style="list-style-type: none"> Purpose: To ensure consistency with national policy Previously Mod 3.2 <p>COMMENTARY</p> <p>By including the aim of 'ensuring the preservation or enhancement of the setting and significance of Airport House within the context of site C8, this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															

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MODIFICATION 60 Site C9: Issues to consider – p51 Amend issue as follows: "Developers planning to intensify develop the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> Designing the site so that operations, <u>whether already on site or proposed to be situated in replacement buildings</u>, are <u>would be</u> carried out within fully enclosed building(s) <u>that do not impact the openness of the Green Belt/MOL.</u>" 													+ + + + +		
NOTES <ul style="list-style-type: none"> Purpose: To improve clarity and ensure consistency with national policy; Previously Mod 3.3 (with minor changes) By amending the relevant bullet point under 'issues to consider' to ensure that new or replacement fully enclosed buildings on this site do not impact the openness of the Green Belt/MOL, this proposed modification is assessed as having: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment and (15) Helping to minimise potentially adverse effects on human health and the open environment 															
MODIFICATION 61 Site C9: Map – page 1 Replace existing site boundary with the site boundary in red on the map above.													No significant impacts – factual change		
NOTES <ul style="list-style-type: none"> To improve clarity and correct an error). previously Mod 3.2 															



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MODIFICATION 63 Site C10: Issues to consider – page 52 Amend issue as follows: <i>"The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018 and attention should be paid to ensure satisfactory residential amenity of the for any existing and future occupiers of this allocation."</i>															
NOTES <ul style="list-style-type: none"> Purpose: To ensure residential amenity is protected for G & Ts Inspector's Question M4 [vi] 2i Previously Mod. 3.5 															
COMMENTARY By requiring proposed waste developments to maintain residential amenity for the occupiers of this allocated gypsy and traveller site, this proposed modification is assessed as having: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (++) for (11) minimising the adverse impacts arising from the construction and operation of waste facilities (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment and (15) Helping to minimise potentially adverse effects on human health and the open environment, and(16) helping to promote equalities, accessibility and social inclusion. 															
MODIFICATION 64 Site C11- page 53 Delete this site and all reference to it in the Plan NOTE <ul style="list-style-type: none"> The site has planning permission for a waste use but this has not been implemented. Site is currently being used for industrial uses and the land owners do not intend to implement the waste permission Inspector's Question M3 [v] 6 Previously Mod 3.6 															
No significant impacts															
MODIFICATION 71 After Site K4 – page 55 Add new site safeguarding sheet: <i>"K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD"</i> See Annex 1 to Modifications Schedule															
++	++	++	++					++							
NOTES <ul style="list-style-type: none"> Purpose: To consistency, clarity and updates with latest information MEDIUM BENEFICIAL IMPACTS (++) for (1) Promoting net self-sufficiency within South London (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings) (3) Promoting waste re-use, recycling and recovery within South London (4) helping to secure the transition to a circular economy, and (9) helping to deliver sustainable transport objectives with the plan area 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p>MODIFICATIONS 76, 82, 85, 88, 91, 94, 99, 109, 112 and 119 Issues to consider (multiple sites) Amend bullet point as follows: <i>"Designing a facility that does not impact on the openness of takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land"</i>.</p> <p>MODIFICATION 76: Site M6 - p66 MODIFICATION 82: Site M10 – p70 MODIFICATION 85: Site M11 – p 71 MODIFICATION 88: Site M12 – p72 MODIFICATION 91: Site M14 – p72 MODIFICATION 94: Site M15 – p 75 MODIFICATION 99: Site M16 – p76 MODIFICATION 109: Site S3 – p82 MODIFICATION 112: Site S7 – p86 MODIFICATION 119: Site S12 – p91</p>															
<p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To ensure consistency with national policy and internal consistency in SLWP • Related to previous Mod 3.1. 															
<p>COMMENTARY</p> <p>By ensuring that proposed waste developments on the ten sites listed listed give consideration to their "wider visual or landscape effects on the adjoining Metropolitan Open Land", this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (++) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. 															
<p>MODIFICATIONS 77, 83, 87, 92, 93, 95, 100, 106-107 and 118 Issues to consider Insert the following as an additional bullet point: <i>"Protecting the amenity of the Wandle Valley Regional Park and those using it."</i></p> <p>MODIFICATION 77: Site M6, page 66 MODIFICATION 83: Site M10, page 70 MODIFICATION 87: Site M12, page 72 MODIFICATION 92: Site M14, page 74 MODIFICATION 93: Site M15, page 75 MODIFICATION 95: Site M15, page 75 MODIFICATION 100: Site M16, p 76 MODIFICATION 106: Site S2, page 81 MODIFICATION 107: Site S3, page 81 MODIFICATION 118: Site S12, p91</p>															
<p>NOTES</p> <ul style="list-style-type: none"> • Purpose: To improve the clarity and consistency of the SLWP • Related to previous Mod 3.1. 															
<p>COMMENTARY</p> <p>By inserting an additional 'issue to consider' relating to the need to 'protect the amenity of the Wandle Valley Regional Park and those using it' for ten of the allocated sites this proposed modification is assessed as having:</p> <ul style="list-style-type: none"> • LARGE BENEFICIAL IMPACTS (++) for (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment and (15) Helping to minimise potentially adverse effects on human health and the open environment; and (16) helping to promote equalities, accessibility and social inclusion within South London. 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
MODIFICATION 80 Site M9: Opportunity to increase waste managed – page 69 Delete: <i>"No. The plot throughput ratio is above the average for this type of facility so there are unlikely to be opportunities to intensify the throughput"</i> Add: <i>"Yes. Although the plot throughput ratio is currently above average for this type of facility any forthcoming planning application seeking opportunities to intensify the throughput would need to demonstrate that the site has the appropriate environmental capacity"</i>															
NOTES <ul style="list-style-type: none"> Purpose: Contributes to consistency, clarity and updates with the latest information in response to Con16/Rep 94 from Mr M Kelly as agent Previously Mod 6 By requiring any forthcoming planning applications for intensifying this site to demonstrate that the site has the appropriate environmental capacity, this proposed modification is assessed as having: <ul style="list-style-type: none"> SMALL BENEFICIAL IMPACTS (+) for (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction (9) helping to deliver sustainable transport objectives (10) minimising air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London 															
MODIFICATION 81: Site M9, page 69 MODIFICATION 96: Site M15, page 7 Issues to consider Amend as follows: <i>"Protecting the residential amenity Contributing positively to the living conditions of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts."</i>															
NOTES <ul style="list-style-type: none"> Purpose: . To improve clarity and ensure consistency across safeguarded sites in the SLWP Previously Mod 2.4 COMMENTARY By including the aim of 'contributing positively' to the residential amenity of those properties in the vicinity of the respective sites (M9 and M15) as one of the 'issues to consider', rather than just giving consideration to this aspect, this proposed modification is assessed as having: <ul style="list-style-type: none"> MEDIUM BENEFICIAL IMPACTS for (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London SMALL BENEFICIAL IMPACTS for (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments and (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															

SA FRAMEWORK OBJECTIVES															
(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste – related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
MODIFICATION 86 Site M12: Issues to consider p72 Amend as follows: <i>"Protecting the residential amenity of those properties (both bricks and mortar and Gypsy and Traveller accommodation) in the vicinity of the site, especially with regard to air emissions and noise impacts"</i>															
					+	+	+	+	++	++			++	+++	+++
NOTES <ul style="list-style-type: none"> Purpose: To ensure residential amenity is protected for Gypsy and Travellers 															
COMMENTARY By ensuring that any proposed waste facilities on site M12 will, protect the residential amenity for occupants of gypsy and traveller accommodation as well as build dwellings ('bricks and mortar'), this proposed modification is expected to have: <ul style="list-style-type: none"> LARGE BENEFICIAL IMPACTS (+++) for (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion. MEDIUM BENEFICIAL IMPACTS (++) for (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities, and (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment SMALL BENEFICIAL IMPACTS (+) (6) helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change (7) helping to avoid, reduce and manage flood risk to and from waste developments (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives with the plan area 															
MODIFICATION 97 Site M16: Issues to consider – p76 Delete <i>"Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</i> Replace with: <i>"Conserving, and where possible enhancing, the significance of the Wandle Valley Conservation Area"</i>															
										++			++		
NOTES <ul style="list-style-type: none"> Purpose: To ensure consistency with national policy response to Con44/Rep 103 from Historic England and Inspector's Question M4 [vii] 2e Previously Mod 12.1 															
COMMENTARY By including a requirement under 'issues to consider' for proposed developments on this , Site to consider opportunities for conserving, and where possible enhancing, the setting and significance of the Wandle Valley Conservation Area, rather than just 'not adversely affecting' it, this proposed modification is assessed as having: <ul style="list-style-type: none"> MEDIUM BENEFICIAL IMPACTS (++) for (11) minimising the adverse impacts arising from the construction and operation of waste facilities (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment. 															

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(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING				
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION	
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve	
MODIFICATION 103 Site S1 777 Recycling Centre–p 80 Delete Site S1 '777 Recycling Centre' and any other references to it in the Plan.																
	+							+	+	+			+			
NOTES Purpose: Site throughput has significantly declined and will continue to do so. Operations are due to cease due to viability SLWP has sufficient capacity to achieveself-sufficiency without it																
COMMENTARY By removing this waste site allocation from the plan while ensuring that the SLWP has sufficient capacity to achieve net-self-sufficiency over vthe plan period without it, this proposed modification will have following localised impacts.																
<ul style="list-style-type: none"> SMALL BENEFICIAL IMPACTS (++) for (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (13) promoting local employment, South London’s economy and the competitiveness of the waste sector (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 																
MODIFICATION 105 Site S2: Issues to consider – p 81 Insert additional bullet point: "Undertaking an air quality assessment and transport assessments in accordance with the requirements of Policy WPS"																
							++	++	++	++					++	++
NOTES <ul style="list-style-type: none"> Purpose: Improve clarity of the SLWP and internal consistency in response to Inspector’s Question M4 [vii] 20 Previously Mod 12.5 																
COMMENTARY This proposed modification is assessed as having:																
<ul style="list-style-type: none"> MEDIUM BENEFICIAL IMPACTS for (8) helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities (9) helping to deliver sustainable transport objectives (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and(16) helping to promote equalities, accessibility and social inclusion within South London; and 																
MODIFICATION 114 Site S10: Issues to consider – p89 Amend bullet point as follows: "Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads"																
	++			++				++	++	++	+		+	++	+	
NOTES <ul style="list-style-type: none"> Inspector’s Question M4 (vii) 2L Previously Mod 12.8 																
By amending the 'issues to consider' listed for this site to require an assessment of the cumulative impacts on the highway network (in discussion with TfL) and opportunities for limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads, this proposed modification is assessed as having:																
<ul style="list-style-type: none"> MEDIUM BENEFICIAL IMPACTS (++) for (2) Promoting an environmentally sustainable strategic approach to managing South London’s waste arisings) (5) helping to minimise CO₂ emissions and address the causes of climate change (9) helping to deliver sustainable transport objectives (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (15) Helping to minimise potentially adverse effects on human health and the open environment; and SMALL BENEFICIAL IMPACTS (+) for(12) helping to protect and enhance biodiversity and habitats (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment and (16) helping to promote equalities, accessibility and social inclusion within South London 																

SA FRAMEWORK OBJECTIVES															
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(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
To provide sufficient sites & waste facilities for all waste streams making up the apportionment	To optimise and intensify new & existing waste sites to make the most efficient use of industrial land	To drive waste management up the waste hierarchy.	To promote a transition to a circular economy within south London.	To address the causes of climate change by minimising CO ₂ emissions from waste facilities	To ensure that all waste management facilities are fully adapted to the impacts of climate change	To avoid, reduce and manage flood risk to or from waste management facilities	To promote the highest standards of sustainable design and construction.	To reduce trips, traffic congestion and pollution from waste - related HGV movements	To minimise air pollution and impacts on sensitive land-uses arising from waste facilities	To minimise the adverse impacts during construction & operation of waste facilities	To protect and enhance biodiversity & habitats	To promote employment, & competitiveness of the waste sector in Sth London	To minimise adverse impacts on townscape quality and visual amenity	To minimise adverse on human health and protect the open environment	To reduce exclusion, address inequalities & improve
<p>MODIFICATION 122 Appendix 3- page 102 Amend Site S1 '777 Recycling' as follows: <i>"Safeguarding carried forward as Site S1 The throughput of the Site has significantly declined and the operator is planning to cease operations due to viability. Capacity from this site is no longer required to meet the waste apportionment."</i></p>															
	+							+	+	+			+		
<p>NOTES Purpose: To ensure internal consistency within the SLWP</p> <p>COMMENTARY By removing this waste site allocation (S1) from the plan while ensuring that the SLWP has sufficient capacity to achieve net-self-sufficiency over vthe plan period without it, this proposed modification will have following localised impacts.</p> <ul style="list-style-type: none"> SMALL BENEFICIAL IMPACTS (++) for (2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings (9) helping to deliver sustainable transport objectives with the plan area (10) Helping to minimise air pollution and potential impacts on sensitive land-uses (11) minimising the adverse impacts arising from the construction and operation of waste facilities (12) helping to protect and enhance biodiversity and habitats (13) promoting local employment, South London's economy and the competitiveness of the waste sector (14) minimising adverse impacts on the quality of townscape and visual amenity and the historic environment 															

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(A) SUSTAINABLE WASTE MANAGEMENT				(B) CLIMATE CHANGE				(C) ENVIRONMENTAL QUALITY				(D) COMMUNITY WELL-BEING			
(1) NET SELF-SUFFICIENCY	(2) SPATIAL STRATEGY	(3) RECYCLING & RECOVERY	(4) CIRCULAR ECONOMY	(5) CLIMATE MITIGATION	(6) CLIMATE ADAPTATION	(7) FLOOD RISK & SuDS	(8) SUST. DESIGN	(9) SUSTAINABLE TRANSPORT	(10) AIR QUALITY	(11) ENVIRONMENTAL PROTECTION	(12) BIODIVERSITY AND HABITATS	(13) ECONOMY & EMPLOYMENT	(14) TOWNSCAPE AND VISUAL AMENITY	(15) HEALTH & QUALITY OF LIFE	(16) EQUALITIES, & SOCIAL INCLUSION
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<p>MODIFICATION 123 Appendix 4: Glossary – page 104 Additions to the Glossary: <i>'Consented Waste Site: A site that has planning permission for a new waste management facility or an existing , Site that has planning permission where an increase in intensification is permitted, for example where: longer operating times are permitted on the existing site; and/or additional storage, machinery, buildings, parking or access roads are permitted on the existing site; and/or the boundary of the site is extended to allow for either of the above.</i> <i>Existing Waste site: A waste site that is materially in operation as a waste site</i> <i>Safeguarded Waste site: A site that is safeguarded for waste uses. This may include sites that are materially operational as waste facilities, vacant waste facilities or vacant plots of land that are safeguarded for waste.</i></p>															
No significant impacts – factual change															
<p>MODIFICATION 124 Appendix 5: Superseded Policies – page 106 Add new Appendix 5 as follows: Appendix 5 South London Waste Plan 2012 Superseded Policies (*various)</p>															
No significant impacts – factual change															

3. Conclusions

Findings of the SA Addendum Report on Main Modifications

3.1 This Final SA Addendum Report has been prepared in order to assess the likely impacts of each of the Main Modifications to the draft South London Waste Plan (SLWP) on the environmental, social and economic objectives making up the SA Framework. The Main Modifications subjected to appraisal in Section 2 are based on the finalised Schedule of Proposed Modifications prepared for consultation by the four SLWP Boroughs in February 2022. This consolidates the Proposed Modifications¹⁴ submitted to the Inspector in July 2021 with number of further changes which have been proposed subsequently in order to address matters of 'soundness' considered at the Examination in Public (EiP) in September 2021, the Inspector's closing remarks and recommendations set out in the Inspector's subsequent letter. There are 131 modifications in total.

3.2 The appraisal matrix presented in Section 2 of this SA Report therefore consolidates the appraisal matrix set out in the previous SA Report on Proposed Modifications originally submitted to the Inspector in July 2021 together with additional appraisal work undertaken on the further changes. However many of the original modifications which were appraised in the previous SA Report have been brought forward unchanged (although with revised numbering).

3.3 The outcome of this final appraisal shows that all 152 of the Main Modifications which constitute a material change in policy have potentially significant beneficial impacts on a range of sustainability criteria. None of the modifications is assessed as having a negative impact (i.e. by comparison with *not* introducing the change and continuing with the original policy wording).

3.4 This findings of this SA Addendum Report should be read in conjunction with the previous SA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and on the Proposed Modifications (July 2021); the Habitats Regulations Assessment (HRA) screening report, the Equalities Impact Assessment (EqIA) and the forthcoming Waste Annual Monitoring Report (AMR) 2020-21.

Overall sustainability appraisal conclusions

3.5 Throughout all stages of plan preparation, the SA process report has been prepared in line with best practice and meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in government planning practice guidance and the SEA regulations respectively. It is soundly based upon the best available local evidence for each of the four boroughs and draws upon the initial analysis of site throughput, capacity and environmental constraints set out in the South London Technical Paper prepared by Anthesis consultants in June 2019, subsequent detailed site appraisal work undertaken by the four boroughs, updated information from site operators, consultation responses and updated information on waste throughputs (WDI).

3.6 The report builds upon the SA Scoping Report published in September 2019 and the previous SA Reports on the SLWP Issues and Preferred Options document published in October 2019, the

¹⁴ the proposed Modifications submitted to the Inspector in July 2021 consisted of the Main Modifications initially submitted to the Inspector alongside the draft SLWP on 19 January 2021 together with the Additional Main Modifications which were proposed subsequently in the light of the Inspector's schedule of matters, issues and questions (MIQs) - see <https://drive.google.com/file/d/13PYU-TX59iM4GNfTz8hGgQgj6dmqNDu/view>

Proposed Submission (September 2020) Modifications (July 2021). As part of the appraisal process, the SA Framework has been refined to take account of comments from the Environment Agency, Natural England and Historic England.

3.7 The SA on the draft SLWP Proposed Submission, when read together this Final SA Addendum Report on Main Modifications, demonstrates that the final SLWP 2022-37 (Option 1 - amended), 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.

3.8 Overall, the most important sustainability benefits of the finalised SLWP, incorporating main modifications, include:

- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;
- 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).

Next Steps

3.9 This Final SA Addendum Report on Main Modifications will be published for consultation together with the draft SLWP, the Schedule of Proposed Modifications and the EqIA between xxx MONTH and YYY MONTH. Following final approval of the plan by the four boroughs, the final SLWP 2022-2037 will subsequently be adopted later in 2022

3.10 All information relating to the examination process will be made available online at www.sutton.gov.uk/wasteplan

