

Report to the Councils of the London Borough of Croydon, the Royal Borough of Kingston upon Thames, the London Borough of Merton, and the London Borough of Sutton

**by Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE
G J Fort BA PGDip LLM MCD MRTPI**

Inspectors appointed by the Secretary of State

Date: 21 November 2022

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the South London Waste Plan

The Plan was submitted for examination on 18 January 2021

The examination hearings were held between 1 and 2 September 2021

File Ref: PINS/P5870/429/9

Contents

Abbreviations used in this Report	3
Non-Technical Summary	4
Introduction	5
Context of the Plan	6
Public Sector Equality Duty	6
Assessment of Duty to Co-operate	7
Assessment of Other Aspects of Legal Compliance	8
Assessment of Soundness	10
Issue 1 – Is the Plan in general conformity with the London Plan?	10
Issue 2 – 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?	12
Issue 3 – 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?	17
Issue 4 – Does the Plan set out effective mechanisms for its implementation and monitoring?	27
Overall Conclusion and Recommendation	29
Schedule of Main Modifications	Appendix

Abbreviations used in this Report

CD	Construction and Demolition Waste
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Co-operate
GLA	Greater London Authority
HCI	Household, Commercial and Industrial waste
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
LACW	Local Authority Collected Waste
LDS	Local Development Scheme
LEZ	Low Emissions Zone
MM	Main Modification
MOL	Metropolitan Open Land
NPPW	National Planning Policy for Waste
PPG	Planning Practice Guidance
SCI	Statement of Community Involvement
tpa	tonnes per annum
WDI	Waste Data Interrogator
WPAs	Waste Planning Authorities

Non-Technical Summary

This Report concludes that the South London Waste Plan (the Plan) provides an appropriate basis for the waste planning within the London Boroughs of Croydon, Merton and Sutton and the Royal Borough of Kingston upon Thames (the Boroughs), provided that a number of main modifications (MMs) are made to it. The Boroughs have specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Boroughs prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal of them. The MMs were subject to public consultation over a seven-week period. In some cases we have amended their detailed wording where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amendments required to achieve general conformity with the London Plan: The Spatial Development Strategy for Greater London (published March 2021) (the London Plan);
- Adjustments to ensure that the Plan accords with national policy in terms of (amongst other things) heritage assets, amenity protection, design and waste management;
- Changes to ensure that robust monitoring arrangements are in place to secure the effectiveness of the Plan; and
- A number of other modifications to ensure that the Plan is legally compliant, positively prepared, justified, effective and consistent with national policy.

Introduction

1. This Report contains our assessment of the Plan in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It first considers whether the Plan's preparation has complied with the Duty to Cooperate (DtC). It then considers whether the Plan is compliant with legal requirements and whether it is sound. The National Planning Policy Framework (the Framework) makes it clear¹ that in order to be sound, a plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the waste planning authorities have submitted what they consider to be a sound Plan. The Plan, submitted in January 2021 is the basis for our examination. It is the same document as was published for consultation in September 2020.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Boroughs requested that we should recommend any MMs necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. Our Report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Boroughs prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal of them. The MM schedule was subject to public consultation for seven weeks. We have taken account of the consultation responses in coming to our conclusions in this Report and in this light we have made some amendments to the detailed wording of the MMs where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the MMs as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary we have highlighted these amendments in the Report.

Policies Maps

5. The Boroughs must maintain adopted policies maps, which illustrate geographically the application of the policies in the adopted Development Plan. The submitted Plan includes maps which illustrate the boundaries of safeguarded sites as part of their site descriptions.
6. The policies maps are not defined in statute as a development Plan document and so we do not have the power to recommend MMs to them. However, the

¹ At paragraph 35

policies of the Plan subject to the MMs we reference below, require changes to be made to the Boroughs' policies maps.

7. These changes to the policies maps were published for consultation alongside the MMs in the 'Proposed Changes to the Policies Map'.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Boroughs will need to update their adopted policies maps to include all the changes set out in the 'Proposed Changes to the Policies Map'.

Context of the Plan

9. The Plan covers four waste planning authority areas (Croydon, Kingston, Merton and Sutton). This joint document, when adopted, would form part of the Development Plans for the Boroughs, and would supersede the South London Waste Plan adopted in 2012. The Plan will be used in the determination of planning applications and seeks to safeguard sites for waste uses. Taken together, the four Boroughs constitute a considerable proportion of the South London area and include both urban neighbourhoods and centres as well as areas covered by Green Belt and Metropolitan Open Land (MOL) designations. The area has a rich historic environment including archaeological designations and a varied townscape, including denser Victorian and more modern development in centres and more recent suburban development in the Boroughs' peripheries.
10. One of the Plan's key tasks is to meet the apportionment set out in the London Plan (2021). This projects how much Household, Commercial and Industrial Waste (HCI) is likely to be generated in London up to 2041. It apportions a percentage share of these waste streams to be managed by each London Borough with an objective that the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.
11. The role, content and purpose of the Plan, as described in LB Sutton's Local Development Scheme (LDS), is to analyse the current and future demand for and supply of waste treatment facilities across the four boroughs and provide policies against which the Councils will determine planning applications for waste treatment facilities. Each of the four South London Boroughs have pooled their apportionments and propose to meet this collectively through existing sites and land allocated in the Plan.

Public Sector Equality Duty

12. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination including paying appropriate attention to the residential amenity and air quality implications of waste related development in respect of differing types of accommodation. These aspects of the examination are discussed in more detail, where necessary, in respect of the main issues set out below.

Assessment of Duty to Co-operate

13. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
14. The Plan covers the management of waste across four Boroughs, and its approach would also have cross-boundary implications for other waste planning authorities. These are the pertinent strategic matters relevant to the Duty to Co-operate (DtC).
15. Details of how the Boroughs have met this duty are set out in the 'Statement of Cooperation Part 1 and Part 2'². These documents set out where, when, with whom and on what basis co-operation has taken place over all relevant strategic matters.
16. The evidence demonstrates that the Boroughs have worked closely with neighbouring waste planning authorities, as well as some further afield where a strategic relationship was identified, throughout the Plan-making process.
17. Also evident is the effective relationship the Boroughs have established and maintained with all of the relevant bodies listed in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the 2012 Regulations). In addition, consultation has taken place with a wide range of organisations and bodies as part of the formal consultation process. It is clear that many of the proposed pre-submission changes to the Plan that were brought forward by the Boroughs were as a result of consultation with relevant parties to address their concerns in a constructive and active manner.
18. Moreover, in terms of cross-boundary collaboration in the wider Greater London area, the Boroughs are active members of the London Waste Planning Forum, involving other waste planning authorities (WPAs), waste operators and other representatives, and have been so throughout the preparation of the Plan.
19. The preparation of the Plan was informed by a Technical Paper³, which assessed imports and exports of waste to and from the Plan area. Based on these matters, the Boroughs engaged in correspondence with the relevant planning authorities and prescribed bodies, which in some cases has resulted in signed Statements of Common Ground⁴. Whilst in other instances positive engagement from other WPAs has not been forthcoming, any shortcomings in these regards are not due to the Boroughs' approach to engagement.

² Document references: E5 and E6

³ E10 and E11 *South London Waste Plan Technical Paper and Appendices*

⁴ Including those in Plan05 *Statement of Cooperation (Part 2)*; and E6 - *Statement of Common Ground with Central and East Berkshire*

20. On the basis of the above considerations, we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.

Assessment of Other Aspects of Legal Compliance

21. The Plan has been prepared in accordance with the Boroughs' LDSs.
22. Consultation on the Plan and the MMs was carried out in compliance with the Boroughs' Statements of Community Involvement (SCIs). The Regulation 19 consultation took place over a seven-week period, consultees, residents' groups, site owners and others were contacted via letter and e-mail. Specific webpages were set up for consultation on the Plan, and paper copies of documents were available at civic offices and libraries where these were open. The consultation was publicised via social media and press releases. Taken together, these considerations are indicative of a consultation process at the Regulation 19 stage which clearly accorded with the Boroughs' SCIs.
23. Whilst the period which MMs are consulted on is not defined in legislation, the Planning Inspectorate's *Procedure Guide for Local Plan Examinations*⁵ makes it clear that the nature and duration of the consultation should reflect that held at the Regulation 19 stage. In the current case, the Boroughs consulted on the MMs and related material for seven weeks. Taken together, these considerations also lead us to the conclusion that the Plan has been prepared in accordance with the Planning Practice Guidance (PPG)⁶, insofar as it advises that WPAs engage and collaborate with local communities in an early and meaningful way when identifying options for managing waste.
24. The Boroughs carried out sustainability appraisal⁷ (SA) of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under Regulation 19. The SA assessed the Plan against reasonable alternatives. The appraisal was updated⁸ to assess the MMs and found that the Plan, subject to the recommended MMs, would have stronger beneficial outcomes in terms of the majority of sustainability objectives it assesses, than the reasonable alternatives considered. It is clear to us from these considerations that the SA has been a genuinely iterative process that has worked in step with and informed the Plan-making process. We therefore conclude that the SA work carried out on the Plan and in the preparation of the MMs is adequate. We discuss the SA's approach to the air quality implications of the Plan in further detail in relation to Issue 3 below.
25. The *Habitats Regulations Assessment Report*⁹ sets out why full Habitats Regulation Assessment (HRA) of the Plan would be unnecessary as firstly, no

⁵ At paragraph 6.9

⁶ Waste Paragraph: 012 Reference ID: 28-012-20141016 Revision date: 16 10 2014

⁷ S2

⁸ Include reference of final document

⁹ September 2020, included as Appendix 2 to the SA (Document Reference:S2)

new waste management sites are proposed. Secondly, arisings and apportionment targets have reduced since the previous iteration of the Plan, which was also screened out from full HRA and it is likely that associated overall heavy goods vehicle (HGV) movements would also be lower than those occurring during the previous plan period. Thirdly, the two European protected sites to the south of the plan area are over 10km from its boundaries and emissions from transport movements are extremely unlikely to have significant effects. Finally, the Plan's strategy is focused on achieving net self-sufficiency and thus would have the potential to limit waste movements to within the plan area itself. It is also noteworthy in these terms that Natural England expressed the view that nothing "other than a brief HRA Screening is required"¹⁰; and that it "does not consider that the Plan poses any likely risk or opportunity in relation to our statutory purpose"¹¹. Taking these considerations together leads us to the conclusion that the approach to HRA is adequate.

26. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the areas covered by the Boroughs. The Plan includes policies relevant to the strategic management of waste across the Plan area.
27. In a similar vein, the Boroughs' Development Plans, taken as a whole, include policies designed to secure that the development and use of land in the Plan area contribute to the mitigation of, and adaptation to, climate change. The Plan (subject to the required MMs as outlined below) emphasises the importance of the proximity principle in terms of processing waste; includes policies to push management of waste up the waste hierarchy; and requires the use of sustainable construction techniques and the use of good quality materials in waste developments. In these respects, it is clear that the Plan accords with s19(1A) of the 2004 Act.
28. Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations) sets out that where Plans contain policies that are intended to supersede other policies in the adopted development Plan, this fact should be stated, and superseded policies must be identified. As submitted the Plan does not clearly comply with this regulation. As a consequence, **MM124** is necessary, which introduces a table which unambiguously sets out which policies are superseded by the Plan, to achieve legal compliance in this regard.
29. The Plan complies with all other relevant legal requirements, including in the 2004 Act and the 2012 Regulations. We give our reasons for our conclusions on its general conformity with the adopted Spatial Development Strategy in our discussion of Issue 1, below. For these reasons, we conclude on this issue, that subject to the above-referenced MM, the Plan is legally compliant insofar as the aforementioned legislative requirements are concerned.

¹⁰ In the correspondence dated 31 January 2020 included as an appendix to the SA.

¹¹ Natural England's Hearing Statement on Matter 1

Assessment of Soundness

Main Issues

30. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified 4 main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or safeguarded site in the Plan.

Issue 1 – Is the Plan in general conformity with the London Plan?

31. The 2004 Act requires the Plan to be in general conformity with the London Plan. As submitted, aspects of the Plan relating to the provision of compensatory capacity are not in general conformity with the London Plan. Consequently, **MM5**, **MM20**, **MM22**, **MM24** and **MM25** are necessary which would ensure that any compensatory capacity provided would secure an equivalent amount of qualifying throughput to any existing waste facility that would be replaced; and to ensure that the Plan would implement the waste hierarchy set out in Policy SI9(C) of the London Plan. Subject to the aforementioned MMs, the Plan would achieve general conformity with the London Plan in these regards. The Mayor of London confirmed¹² that these MMs would address non-conformity issues previously identified at the Regulation 19 stage.
32. Policy WP7 and its supporting text set out a restrictive approach to the development of additional energy from waste facilities. Whilst the London Environment Strategy (May 2018)¹³ sets out¹⁴ that “no new energy from waste facilities in London will be needed”, Policy SI8 (D) of the London Plan encourages (amongst other things) proposals for materials and waste management sites where they contribute toward renewable energy generation, and/or are linked to combined cooling heat and power.
33. In light of these considerations, **MM41** is necessary. This would ensure that the Plan is in general conformity with the London Plan in terms of its approach to the development of new energy from waste sites. In addition, it would also reflect the Boroughs' generally restrictive overall approach to the development of new waste management uses, which is justified on the basis of the competing demands for a limited supply of land for employment use, matters which we consider further below. As drafted, the Plan does not explicitly reference how additional benefits from waste development would be assessed, and thus does not fully reflect Policy SI8(D) of the London Plan in these terms. However,

¹² In its “Statement of General Conformity” letter to the Boroughs dated 26 August 2021 included as OTH03 in the Examination Library

¹³ Document Reference: R2

¹⁴ In Objective 7.4

MM40 would ensure that the Plan clearly reflects the London Plan in these terms and would thus secure general conformity on this issue.

34. The Chessington Railhead site is being used for the treatment and recycling of construction waste pursuant to the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. We are aware of no impediments in planning terms which would prevent the Railhead site from being in continued waste use at or around the time of the adoption of the Plan. However, as submitted the Railhead has not been identified as a safeguarded waste site in the Plan.
35. The consequences of the Chessington Railhead not being allocated as a safeguarded site are firstly, that any material development which would need express planning consent would be restricted by the policies of the Plan. This could inhibit the site moving up the waste hierarchy. Secondly, that the site itself would not benefit from the restrictions on adjacent development affecting waste sites which are set out in Policy WP8. Moreover, the approach would be clearly contrary to Policy SI8 of the London Plan insofar as it expects existing waste management sites to be safeguarded, and that their capacity should be optimised. Accordingly, **MM71** is necessary, which identifies the Railhead as a safeguarded site. The MM would achieve both general conformity in these regards and secure the effectiveness of the Plan in terms of ensuring that the use of the site could contribute to its objectives insofar as the waste hierarchy is concerned.
36. Policy SI9 of the London Plan sets out that waste sites should only be released to other land uses where compensatory processing capacity is re-provided elsewhere in London. However, the Plan is not clear that compensatory provision provided outside of its boundaries but elsewhere in London would be an acceptable way of facilitating the release of any of its safeguarded sites. Consequently, **MM19** is necessary, which would clarify the position on this matter and thus achieve general conformity with the London Plan in these terms.

Conclusion on Issue 1

37. Taken together, the above considerations lead us to the conclusion on this issue that the Plan, subject to the aforementioned MMs, is in general conformity with the London Plan, and thus complies with s24 of the 2004 Act. In arriving at this view, we have taken particular note of the Mayor of London's response to the MM consultation, which sets out his view that general conformity would be achieved subject to the MMs outlined in this report.

Issue 2 – 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?

Waste Management Apportionments

38. In terms of the management of HCI waste, the National Planning Policy for Waste (NPPW) sets out¹⁵ that WPAs in London should have regard to the apportionments as set out in the London Plan. We have seen no evidence sufficient to indicate that deviation from the clear steer given by the NPPW in these terms would be justified, and neither has it been demonstrated that the evidence from which the apportionments are derived is not based on a robust analysis of the best available data and information¹⁶, or that any other methodology would yield materially different results in these terms.
39. Policies WP1 and WP2 of the Plan are identified as strategic policies. According to the Framework such policies should look ahead a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities. As submitted, the plan period runs to 2036 and thus would not cover the full fifteen-year period from adoption. Consequently, to achieve consistency with national policy in these terms, **MM1.1, MM2, MM10, and MM16** are necessary, which would extend the Plan-period to 2037. In consequence of this change the apportionment requirements, and forecasts of other waste arisings over the plan period need to be adjusted to take into account the longer timeframe. **MM5.1, MM7.1, MM8, MM10.1, MM11** and **MM14.1** provide for this and are necessary for the Plan to be effective.
40. The revised plan period (2022 to 2037) is shorter than that of the London Plan's timeframe for waste apportionments (2021 to 2041). Nevertheless, in dividing the apportionment requirements across five-year tranches in accordance with the approach set out in the Technical Paper¹⁷, the Plan includes a robust and reasonable approach to estimating the apportionment target it would have to meet by 2037. In any event, subject to the MMs outlined below, the Plan identifies sufficient throughput capacity to meet the apportionment requirements set out in the London Plan for 2041.
41. The Technical Paper includes an assessment of the amount of waste managed per annum applicable to achieving the London Plan's apportionment requirements. These are operations which: use waste in energy recovery; sort or bulk waste for reuse, reprocessing or recycling; reuse, reprocess or recycle material; or produce as a solid recovered fuel or high-quality refuse-derived fuel. Of sites involved in these operations, the Technical Paper assesses both waste sites subject to the relevant Environment Agency permits, and those with

¹⁵ At paragraph 3

¹⁶ Per paragraph 2 of the of the NPPW

¹⁷ E10 at 3.5

exemptions, which nevertheless are involved in the treatment of waste. Taken together, the range of operations considered across the Plan area provides a reasonable basis for assessment. Although other exemption categories have been suggested by some as having the potential to contribute to the area's capacity, we are not persuaded that their inclusion would yield materially different figures to those presented in the Plan.

42. In line with the London Plan¹⁸, the maximum throughput of a site over the last five years is used to assess its capacity, and the proportion of the maximum figure that is managed on site is used to assess its contribution to achieving apportionment requirements. As drafted however, the Plan indicates that the assessment of qualifying throughput would be based on the period of 2013-2017, which would neither allow for effective development management responses to sites, nor provide a basis for robust monitoring of the Plan.
43. Consequently, in order to assist with the monitoring of the Plan, and to accord with its objectives in terms of securing an adequate amount of capacity to meet apportionments and construction, demolition (CD) and excavation arisings, balanced against the objective to ensure the availability of sufficient land for other industrial uses in the area **MM19** and **MM49** are required. These MMs would make it clear that an assessment of throughput would be based on the latest five-year period for which data is available, and would achieve effectiveness and general conformity in these terms.
44. A consequential modification (implemented by means of **MM50**) is necessary which updates the figures in the Plan to take into account the latest available data from the Waste Data Interrogator (WDI), in the interests of effectiveness. This data indicates a healthy surplus in terms of the apportionment requirement over the Plan period, and would also meet the South London requirement for 2041, as set out in the London Plan. On this basis, it is clear that the Plan does not need to identify any additional sites or areas for new or enhanced waste management facilities to accommodate the London Plan apportionments.

Construction and Demolition Waste

45. The Government's Planning Practice Guidance¹⁹ (PPG) advises that, in Planning for construction and demolition waste, WPAs should start from the basis that net arisings will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based. PPG sets out that other issues may be relevant including existing returns from waste management facilities; data from site management plans; the provision made for unseen capacity through on-site re-use or management at exempt sites; and any significant planned regeneration or major infrastructure projects.

¹⁸ At paragraph 9.9.2

¹⁹ Waste at Paragraph: 033 Reference ID: 28-033-20141016 Revision date: 16 10 2014

46. The evidence on which the Plan's CD arisings is based further develops the methodology outlined in the London Plan Topic Paper²⁰ on this matter. The Topic Paper explains discrepancies in the WDI data relating to CD waste, particularly in terms of the throughput of waste handled by exempt sites and operations. Consequently, in order to refine forecasts for this waste stream, and in addition to analysis of planned regeneration or major infrastructure projects, the Topic Paper uses projections of employment growth in the construction sector, which informed the London Plan more widely, to assess future CD arisings.
47. It is acknowledged that the PPG does not explicitly reference employment growth in the construction sector as an issue that may be relevant in the assessment of CD arisings. However, the PPG does not explicitly rule out the use of such information in developing forecasts for this waste stream, and also indicates that a "qualitative" assessment may also be acceptable²¹. Accordingly, in this instance, and against the background of the London Plan's evidence in these regards, we consider that the use of projected employment growth in the construction sector to inform the Plan's CD forecasts is reasonable. In arriving at this view, it is noteworthy that capacity identified in the Plan comfortably exceeds forecast arisings, as discussed further below.
48. Over the Plan period as revised by **MM1.1**, **MM2**, **MM6.1**, **MM10**, and **MM16**, and based on the methodology outlined above, CD arisings would equate to 415,019 tpa. Taken together, safeguarded sites in the Plan provide capacity for 568,189 tpa of qualifying throughput based on the most up-to-date information available. It therefore follows that the Plan makes adequate provision for arisings related to this waste stream.
49. The Plan is not in general conformity with the London Plan in terms of the beneficial use of CD waste. Neither would it be clear to a decision-taker what would constitute 'beneficial use' for the purposes of the Plan. Consequently, **MM3**, **MM6**, **MM38** and **MM39** are necessary which provide examples of beneficial use and identify that the London Plan sets a target of 95% of excavation material going to beneficial use and 95% of CD waste being reused, recycled or recovered. These MMs are necessary to ensure conformity with the London Plan and to provide clarity in these terms²².

Other Arisings

50. No specific sites are allocated or safeguarded to deal with excavation waste. Nevertheless, the approach to excavation waste does not conflict with the London Plan in this respect, which does not expect Boroughs to demonstrate net self-sufficiency in terms of such arisings. The Plan expects that excavation waste will continue to be put into beneficial use outside London, and no

²⁰ Plan11 *London Plan Topic Paper: Waste*

²¹ At Paragraph: 035 Reference ID: 28-035-20141016 Revision date: 16 10 2014

²² In line with paragraph 16(d) of the Framework

comments have been made via engagement on the Plan, including through the DtC process, to cast doubt on this assumption. Moreover, Policy WP2 supports the provision of temporary sites for the deposit of excavation waste. It follows from these considerations that the Plan is effective, justified and therefore soundly based in terms of its approach to excavation waste.

51. Forecasts for other arisings in the area are based on the relevant WDI information as a starting point. Arisings in the Plan area of agricultural and radioactive waste are minimal. Consequently, this does not give rise to any demonstrable need for specific facilities to be allocated in the Plan to deal with these waste streams.
52. In terms of hazardous waste, the WDI information is supplemented by growth rates applied to London Plan commercial and industrial waste arisings to produce forecasts. The evidence indicates that hazardous waste generation in the Plan area is small and the quantity identified is already managed by identified specialist facilities. Moreover, these facilities would comfortably accommodate the small increase in arisings projected over the Plan period. Consequently, there is no justifiable requirement for the Plan to make provision for any hazardous waste treatment facilities. However, the Plan as drafted is unclear as to how applications for such facilities would be assessed, and consequently **MM14** is necessary, which would ensure an effective approach to such matters.
53. For wastewater, Thames Water has supplied information on volumes treated and amount of sludge produced, and confirmed that sufficient capacity exists currently to address these arisings over the revised Plan period. Moreover, Policy WP2 is supportive of development for improvements to the operation of sewage treatment works within the Plan area.
54. In all of these other waste arisings, the information used to inform the Plan accords with the PPG insofar as it identifies potential sources of waste data that could be used²³. Consequently, the Plan is based on reasonable and robust assessments of arisings of these waste streams and is therefore justified in these terms.
55. Due to the minimal arisings of radioactive and agricultural wastes, the existing permits and processes to deal with the former, and ability of sites handling CD and other waste streams to deal with the latter, we agree that the Plan does not need to identify specific facilities to manage these arisings.
56. However, the Plan is unclear as to how applications for the management of agricultural waste would be assessed. In order to ensure effectiveness in these regards **MM13** is necessary which identifies that proposals for agricultural waste facilities would only be considered in exceptional circumstances having regard to Policy WP2. We have made a minor post-consultation change to **MM13** to

²³ At Paragraph: 035 Reference ID: 28-035-20141016 Revision date: 16 10 2014

ensure that the correct policy criterion is referred to, a matter that was fully covered in responses to the MMs.

57. Accordingly, on the basis of these considerations, the Plan's approach to these waste streams is clearly justified.

Intensification

58. As set out above, the throughput of safeguarded sites would comfortably meet the London Plan apportionments for the Plan period and beyond, nevertheless Policy SI8 of the London Plan stipulates that the waste management capacity of existing sites should be optimised. The Plan has identified sites capable of being intensified based on discussions with their operators relating to future intentions. Of those where potential for intensification has been identified, a figure of 60,000²⁴ tonnes of throughput per hectare has been assumed as a basis for the additional capacity that could be realised.
59. We have taken into account views that other methodologies, including more nuanced site-specific analyses of intensification capacity may have resulted in higher throughput estimates than those on which the Plan is based. However, it is important to emphasise that the Plan does not rely on the intensification of sites to meet its apportionments or other arisings. Neither is there any certainty at this stage that intensification would occur at identified sites within the Plan period. For these reasons, it would not be necessary for a more nuanced assessment of potential capacity increases on sites identified as being capable of intensification.
60. Appendix 2 of the Plan contains discrepancies in terms of its identification of sites considered suitable for intensification when compared with the individual site descriptions. Consequently, **MM52**, **MM70**, **MM80** and **MM121** are necessary, which would rectify this position in the interests of clarity, and to achieve consistency with national policy²⁵ in this regard.

Safeguarded Sites

61. Although Policy SI9 of the London Plan anticipates that existing waste sites should be safeguarded and retained in waste management use, its supporting text²⁶ indicates that release of current waste sites should be part of a Plan-led process, rather than done on an ad hoc basis.
62. Whilst site S11²⁷ has an extant planning permission for waste uses this has not been implemented. Moreover, the current occupier of the site has no intention of implementing that permission. Accordingly, the site does not constitute an existing site for the purposes of the London Plan. Moreover, the healthy

²⁴ As set out in section 3 of E11: *South London Waste Technical Paper Appendices*

²⁵ In particular paragraph 16(d) of the Framework

²⁶ At paragraph 9.9.2

²⁷ TGM Environmental, Beddington Lane, Sutton CR0 4TD

capacity of the Plan area's other safeguarded sites, as evidenced by Appendix 2 of the Plan (subject to **MM121**) means that no adverse effects would occur to the Boroughs' demonstrated ability to meet their apportionment requirements or the needs related to other arisings if site S11 were to be removed as a safeguarded site. Consequently, **MM116** is necessary which would remove safeguarding from the site, in the interests of the Plan's justification and effectiveness.

63. Similarly, whilst site C11²⁸ benefits from planning permission for waste uses, it is currently not in use for that purpose and is unlikely to come forward for such a use in the Plan period. Consequently, due to the competition for industrial land in the Boroughs, taken together with their healthy waste management capacity, and the position of the London Plan on safeguarding, **MM64** is necessary. This would remove safeguarding from site C11 and thus ensure effectiveness and general conformity with the London Plan.
64. Monitoring of the WDI has shown declining throughput on site S1²⁹ over recent years. The site operator indicates that this trend is likely to continue. Taking this together with the acknowledged shortage of land in the area (particularly for employment uses), the healthy throughput capacity of safeguarded treatment sites dealing with CD waste, and the safeguarding of the Chessington Railhead site for waste purposes arising as a result of **MM71**, the safeguarding of the S1 site is no longer justified. Consequently, **MM103** and **MM122** are necessary, which would remove safeguarding from site S1. These MMs ensure that the Plan is effective and justified in these terms.

Conclusion on Issue 2

65. For the reasons set out above, and subject to the referenced MMs, the Plan makes adequate provision for the waste management apportionments required by the London Plan and other arisings and is positively prepared in this regard.

Issue 3 – 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?

Strategic Objectives and the development Plan

66. The Plan is unclear as to how its vision has informed the strategic objectives, and how these considerations are to be delivered by the Plan's policies. Consequently, to ensure that the Plan is soundly based in these terms, **MM7** is necessary which unambiguously identifies the policies that will deliver the objectives of the Plan. This MM is necessary for the Plan to be effective.

²⁸ C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon CR5 2HT

²⁹ 777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TE

67. As drafted, supporting text in paragraph 5.24 of the Plan relating to increase of waste management throughput on transfer sites is inconsistent with s38(6) of the 2004 Act in requiring a proposal to be in compliance with all policies of a Development Plan. Consequently, **MM18** is necessary which ensures that all relevant policies of the Development Plan would be taken into account in an assessment of such proposals, and thus ensures the Plan's effectiveness in these regards.

Air Quality and Transport

68. Whilst representations have been made in regard to the air quality implications of transport movements associated with existing waste operations in the Plan area, the imposition of further planning controls on extant and consented uses regarding air quality and transport matters is outside of the scope of the Plan.
69. We note that the likely effects of the Plan on the prevalence of NO₂ and particulates in Air Quality Focus Areas (AQFAs) and Air Quality Management Areas (AQMAs) were a focus for SA's assessment in these regards. Nevertheless, the use of the phrase "particularly within AQMAs and AQFAs", makes clear that these areas were not the only focus of the SA, and wider considerations were taken into account in its assessment including the effects of air quality on sensitive receptors more generally throughout the Plan area. We consider the approach of the SA to be adequate in these regards.
70. On this basis, the SA found that the Plan's strategy, insofar as it seeks to restrict new waste related development to existing safeguarded sites, would be preferable in terms of its air quality and transport implications when assessed against reasonable alternatives. Moreover, the Plan's policies encourage the co-location and intensification of existing facilities, which could have positive impacts on the transport implications of development. Furthermore, locational criteria for compensatory provision directs such uses to land where the presence of sensitive receptors in terms of any highway or air quality impacts would be less likely. It is noteworthy too that the use of fully enclosed facilities for any new waste operations is also encouraged by the Plan, which again would help to mitigate air quality effects of further waste development.
71. Critically, the Plan's policies relating to site intensification and compensatory provision include clear criteria relating to air quality and the transport effects of any new waste development, including requirements for planning obligations directed to these matters. The list of documents required to support any applications for new waste development include items that would allow for a meaningful assessment of the air quality implications of proposals. Of relevance to our considerations on these matters also is the implementation of the Greater London Low Emission Zone (LEZ), which may also help to mitigate the air quality implications of HGV movements associated with any additional waste developments coming forward in accordance with the Plan's policies.

72. Whilst in these broad terms the Plan's strategy is clearly justified and effective it is not abundantly clear as to how the highway and air quality implications of waste developments would be monitored to ensure the effectiveness of any mitigation measures. Consequently, in the interests of the effectiveness of the Plan in these regards, **MM45** and **MM47** are necessary which would introduce supporting text to Policy WP10, and clarifies the type and scope of planning obligations that may be required to address air quality and transport matters – including provisions for monitoring their effectiveness, and sets out the interaction of the planning system with other regulatory regimes in these terms. **MM32** is also necessary which would give more guidance on the information that is to be included in support of a planning application to enable consideration of air quality and transport matters. This MM is necessary for the Plan to be effective.
73. The implications of monitoring of the air quality of safeguarded sites, and what actions this may trigger (in combination with other monitoring aspects) is discussed in respect of Matter 4 below.
74. Given the location of the S10 site in relation to the strategic highway network, and Transport for London's views on the site, it is necessary to include a site-specific requirement for any planning applications for further waste development to be supported by a transport assessment which considers the cumulative impact on the highway network. This is provided by **MM114** which is necessary for the Plan to be effective and justified.
75. To ensure that the Plan would be in general conformity with the London Plan on these air quality and transport matters, particularly the achievement of air quality neutrality and in respect of other potential pollutants, **MM28**, **MM31** and **MM32** would introduce additional wording to Policy WP5, and its supporting text. These MMs add further detail in terms of the effects to be taken into account in the assessment of any compensatory or intensification proposals, and information requirements which need to be supplied with applications. Critically, the MMs would ensure that the totality of air quality effects of a proposal, including the implications of associated transport movements would be assessed. The MMs also ensure consistency with national policy³⁰ insofar as it expects planning policies to ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment.
76. As drafted, the safeguarding policy for the S2 site fails to reflect air quality implications, and as a consequence **MM105** is necessary in the interests of effectiveness.
77. As national policy makes clear³¹, WPAs should not concern themselves with the control of processes which are a matter for the pollution control authorities,

³⁰ Particularly paragraph 185 of the Framework

³¹ At paragraph 188 of the Framework and paragraph 7 of NPPW

and should work on the assumption that the relevant pollution control regime will be properly applied and enforced. On this basis, it is clear that, insofar as the scope of the Plan under examination is concerned, subject to the MMs set out above, it sets out a positively prepared, justified and effective approach to air quality issues insofar as they are relevant to planning, and that it is consistent with national policy in these terms. In terms of matters outside of planning control, we note the Environment Agency's keenness to continue partnership work with the Boroughs to ensure waste management sites across the Plan area do not cause environmental issues, as expressed in its response to the MM consultation.

Design

78. NPPW expects³² waste management facilities to be well-designed and contribute positively to the character and quality of the area in which they are located. However, Policy WP5 of the Plan only requires a design that ensures significant adverse effects would be avoided and does not consider the appearance of new waste management development. The Plan is therefore inconsistent with national policy in these regards. **MM26** and **MM31** are therefore necessary, which would ensure that Policy WP5 reflects NPPW's requirement for waste development to contribute positively to character and quality of its surroundings.
79. The Plan³³ indicates that the operational areas of sites for compensatory waste provision or intensified sites "should be within a fully enclosed building". The use of the word "should" is indicative that this is not an absolute constraint on the layout of sites, and other factors such as considerations of a proposal's effect on the wider environment and residential amenity would also be relevant in assessing site layouts. Consequently, the Plan would achieve general conformity with the London Plan³⁴ insofar as it expects that sites should be fully enclosed where they would be likely to produce significant air quality, noise or dust impacts; and that regard is had to operational yard space requirements when considering intensification proposals.
80. For these reasons, and subject to the aforementioned MMs, the Plan sets out a clear design vision and expectations, and thus achieves conformity with the Framework³⁵ in this respect. Although the Framework emphasises the role of design guides and codes³⁶ these wider matters are clearly more relevant to the constituent Boroughs' other Development Plan documents, and no further

³² At paragraph 7

³³ In Policy WP5 and in the issues to consider if there is a further application in relation to safeguarded site descriptions

³⁴ Particularly Policies E7 and SI 8

³⁵ At paragraph 127

³⁶ At paragraph 127 ff

adjustments would be necessary to ensure the soundness of the Plan in this regard.

81. Some safeguarded sites are located close to open spaces, such as Metropolitan Open Land (MOL). However, as drafted the site safeguarding policies do not adequately identify the wider visual and landscape effects on adjacent open land and countryside as relevant considerations should intensification proposals come forward. Consequently, **MM56, MM60, MM76, MM82, MM85, MM88, MM91, MM94, MM99, MM109, MM112** and **MM119** are necessary, which ensure that the Plan would provide effective policies on these matters.

Amenity Considerations

82. The NPPW expects³⁷ that the likely impact of waste development on the local environment and amenity should be considered at the planning application stage. Whilst Policy WP5 of the Plan seeks to protect and enhance amenity, aspects of its wording are neither clear nor unambiguous, and thus **MM27** is needed to ensure that residential and other amenity implications (including those relating to the Wandle Valley Regional Park) of any development are adequately reflected, and to secure consistency with national policy in this regard. Similarly, amendments to achieve clarity, and thus consistency with the Framework³⁸ are required to the relevant safeguarded site considerations, and as a result **MM51, MM53, MM54, MM55, MM59, MM62, MM65, MM66, MM67, MM68, MM69, MM72, MM73, MM74, MM75, MM77, MM78, MM79, MM81, MM83, MM84, MM86, MM87, MM89, MM90, MM92, MM95, MM96, MM98, MM100, MM101, MM102, MM104, MM106, MM107, MM108, MM110, MM111, MM113, MM117** and **MM118** are all required.
83. Two of the safeguarded sites³⁹ are adjacent not only to 'bricks and mortar' dwellings, but also to existing and proposed gypsy and traveller accommodation. As drafted, the issues to consider in relation to any further waste applications pertaining to those sites do not reflect this mix of dwellings. As a result, the Plan does not accord with the Government's Planning Policy for Traveller Sites⁴⁰, or the Framework⁴¹, insofar as they expect a high standard of amenity for existing and future users of places, and that planning policies should provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and wellbeing of any Travellers as a result of new development. Accordingly, **MM63** and **MM86** would introduce appropriate references to existing and Planned Gypsy and Traveller accommodation in relation to the C10 and M12 sites, which would ensure that the Plan is consistent with national policy in this regard.

³⁷ At paragraph 7

³⁸ At paragraph 16(d)

³⁹ C10 and M12

⁴⁰ At paragraph 13 (e)

⁴¹ At paragraph 130 (f)

84. The Framework recognises that access to a network of high-quality open spaces and opportunities for sport and physical activity is important to the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. The aforementioned MMs would ensure that the Plan is in conformity with the Framework in these regards and particularly insofar as the Wandle Valley Regional Park is concerned. Although other items have been suggested as 'issues to consider' in relation to sites adjacent to the Wandle, their inclusion would go beyond either what could reasonably be controlled by condition or secured by planning obligation. These considerations, taken together with our findings on soundness in this specific regard, subject to the aforementioned MMs, indicate that no further adjustment is needed to the Plan insofar as is relevant to the Wandle Valley Regional Park.

Community Engagement

85. The PPG⁴², sets out that engagement with local communities affected by previous waste disposal decisions would help with considerations of whether existing waste facilities should be expanded/extended. As drafted, it is not sufficiently clear from the Plan as to how and when communities would be engaged in proposals relating to compensatory provision, or to the intensification of existing sites. Consequently, **MM1** is required which would set out how this could be achieved with appropriate references to the constituent Boroughs' SCIs. This modification would ensure consistency with the NPPW insofar as it identifies planning's pivotal role in providing a framework in which communities and businesses are engaged with waste management issues.

Policy WP4 Sites for Compensatory Provision

86. Policy WP4 sets out locational criteria relating to sites for compensatory provision. However, as drafted it is unclear whether the term "strategic open land" encompasses only Green Belt and MOL, or whether it might include other designations. Accordingly, in the interests of the effectiveness of the policy, and to achieve consistency with the Framework⁴³, **MM23** and **MM25** are required which would delete the term "strategic open land" and make it clear that Green Belt and MOL are the relevant planning designations to consider as part of site assessment. Moreover, those MMs are required in order to achieve consistency with the Framework in terms of inappropriate development in the Green Belt, the NPPW insofar as it emphasises the sequential preferability of non-Green Belt sites for waste uses⁴⁴; and to ensure general conformity with the London Plan in these terms in respect of MOL.
87. It is not clear from the submitted Plan whether the intensification of existing sites could contribute to compensatory provision. Taken together with the healthy

⁴² Waste Paragraph: 047 Reference ID: 28-047-20141016

Revision date: 16 10 2014

⁴³ In particular paragraph 16 (d)

⁴⁴ At paragraph 6

waste management capacity of safeguarded sites, the pressure on land in the Boroughs to meet other industrial uses merits a more directive approach in this regard, in the interests of the effectiveness of the Plan. Consequently, **MM17**, **MM24** and **MM25** are needed in order to achieve soundness in these terms.

88. As submitted the Plan is not in conformity with the London Plan in terms of how the throughput of sites would be assessed when proposals for compensatory provision are considered, and neither is it clear how compensatory provision would be secured in order to release waste sites for other uses. **MM19** is therefore necessary to ensure the Plan's general conformity and effectiveness in these terms.

New Waste Uses

89. Whilst the healthy position on waste management capacity for the Boroughs over the Plan period justifies the generally restrictive approach to the development of waste uses outside of safeguarded sites, the Plan is nevertheless unclear as to how applications for such uses would be considered. This is particularly relevant when such uses could contribute to the objectives of both the Plan and London Plan more generally. Consequently, **MM9**, **MM12**, **MM14**, **MM16** and **MM21** are necessary which explain the restrictive approach to new waste uses, and outline factors that would be taken into account in the assessment of proposals relating to sites which are not safeguarded by the Plan. These MMs are necessary to ensure that the Plan is both justified and effective in these terms, and to achieve general conformity with the London Plan. In consequence of these MMs, **MM15** is also necessary to ensure that any new waste uses would benefit from safeguarding to achieve general conformity with the London Plan in this respect. We have made a minor post-consultation change to **MM12** to ensure that the correct policy criterion is referred to, a matter that was covered in representations, and no prejudice therefore arises to the interests of any parties as a result.
90. Some consider the approach to new waste uses is onerous, and that this may discourage innovation and that the Plan is insufficiently flexible in terms of accommodating needs not anticipated. Nevertheless, the healthy capacity of the existing supply of safeguarded sites, taken together with the demand for non-waste uses, which also have to be accommodated in the Plan area, serve to justify the restrictive approach. Furthermore, the Plan's effective monitoring arrangements secured by MMs, and set out more fully in respect of Issue 4 below, would highlight if any needs not anticipated in the Plan would have to be accommodated. In terms of innovative approaches which do not accord with the policies, it is always open for a planning applicant to demonstrate that other material considerations justify a decision otherwise than in accordance with the Plan at the development management stage. These considerations clearly add further weight in favour of the Plan's restrictive approach.

Policy WP6 Sustainable Construction and the Design of Waste Facilities

91. Policy WP6 of the Plan requires waste developments to achieve an excellent rating under bespoke BREEAM and/or CEEQUAL schemes. It states that a lower CEEQUAL/BREEAM rating may be acceptable where achievement of the excellent rating would make a proposal unviable. However, it is not clear what information may be needed to justify a variation from the excellent rating. Accordingly, to ensure effectiveness in this regard, **MM34**, **MM35**, **MM36** and **MM37** are necessary, which further explain the terminology and expectations of the Plan and outline the type of evidence required, and emphasises the role of pre-application engagement, in order to achieve consistency with the Framework⁴⁵.
92. The supporting text to Policy WP6 includes reference to planning guidance and other documents that are no longer extant. Consequently, to ensure that the Plan is justified in these regards, and provides an effective basis for planning decisions **MM37** is necessary which would delete references to those documents.

Policy WP9 Planning Obligations

93. As drafted, the scope of items that could be captured by planning obligations does not accord with the Framework⁴⁶, or the legislative tests set out in the Community Infrastructure Levy Regulations 2010⁴⁷. Consequently, **MM43** and **MM44** are necessary, which amend the wording of Policy WP9 and includes supporting text to ensure conformity with national policy.

Information Requirements

94. The schedule to Policy WP5 of the Plan includes a large number of documents that might be needed to support applications for waste development. Some of the suggested documents, particularly those relating to the transport implications of a proposal, would seem to cover substantially similar ground to others in the schedule. Consequently, to ensure effectiveness in these terms and avoid repetition, **MM33** is required. This MM would clarify the sorts of information that would be required and how it might be captured.
95. During the course of the examination the Boroughs clarified that the schedule is a non-prescriptive list, and that the precise documents required would be likely to vary on a case-by-case basis. Consequently, **MM30** and **MM31** are required, which would amend Policy WP5 to emphasise the importance of pre-application engagement on these matters. These MMs would ensure the effectiveness of the Plan. Moreover, through the encouragement of good quality pre-application discussion⁴⁸, and by their ensuring that only supporting information that is

⁴⁵ At paragraphs 39ff

⁴⁶ At paragraph 57

⁴⁷ In Regulation 122

⁴⁸ At paragraph 39ff

relevant, necessary and material to an application in question would be requested⁴⁹, the MMs would also secure consistency with the Framework in these terms.

Agent of Change Principle

96. Policy WP8 of the Plan includes the relevant considerations relating to non-waste developments in the vicinity of safeguarded sites, which is consistent with the Framework in terms of the “Agent of Change” principle⁵⁰, and in general conformity with the London Plan Policy D13 insofar as it requires new proposals for noise sensitive development to mitigate any adverse effects of existing nuisance-generating uses. However, the Framework sets out⁵¹ that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Consequently, to achieve consistency with national policy in this regard, and to ensure the effectiveness of the Plan, **MM42** is necessary which adds an additional criterion to Policy WP8 to ensure that the criticality of pre-application engagement on the part of those proposing non-waste uses in the proximity of a waste site is reflected.
97. As drafted, the wording of Policy WP8 is unclear in terms of the sort of waste sites that it would relate to and in particular whether the policy relates to consented or safeguarded sites. Consequently, **MM42** is necessary, which would add clarity in these regards and thus ensure effectiveness and consistency with the Framework⁵².

Waste Miles

98. To ensure that the proximity principle is appropriately referenced **MM29** and **MM31** are necessary, which make reference to the concept of waste miles in terms of the issues to consider in the assessment of planning applications. The MMs also emphasise the requirement for the potential of using sustainable modes of transport for incoming and outgoing materials to be explored. In these ways, the MMs ensure that the Plan is in accordance with national policy, in general conformity with the London Plan, and secures the effectiveness of Policy WP5 in this regard.

Historic Environment

99. As worded the Plan's policies relating to the historic environment are not consistent with national policy⁵³, or the relevant statutory duties arising from the Planning (Listed Buildings and Conservation Areas) Act 1990. Consequently **MM27**, **MM31**, **MM57**, **MM58**, **MM93** and **MM97**, are necessary which would

⁴⁹ At paragraph 44

⁵⁰ At paragraph 187

⁵¹ At paragraph 39

⁵² In terms of paragraph 16 (d)

⁵³ Contained in section 16 of the Framework

amend relevant policy criteria to achieve conformity with national policy and ensure the effectiveness of the Plan in this regard. We have made a slight amendment to the historic environment elements of **MM31**, from the wording that was originally consulted on, to ensure that it accords with the analogous wording set out in **MM27**. This aspect of the MMs was adequately reflected in consultation responses, and no prejudice would occur to the interests of any parties as a result of this change.

100. The description of the S10⁵⁴ site indicates that it is located within an Archaeological Priority Area. However, the desirability of conserving the significance of the site in archaeological terms is not reflected in the list of issues to consider if there is a further application. As drafted, the Plan would be inconsistent with the Framework's expectation that heritage assets should be conserved in a manner appropriate to their significance. Accordingly, **MM115** is necessary, which would introduce a criterion relating to the area's archaeological significance.

101. The Plan sets out⁵⁵ that development for waste uses would only be allowed in accordance with the Plan and other documents and Plans which constitute a borough's Development Plan, unless material considerations indicate otherwise. The Framework makes clear⁵⁶ that Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the Framework). Consequently, further modifications, which sought to introduce the relevant "balances"⁵⁷ set out in national policy, or the text of any of the Boroughs' other adopted Development Plans, would be both unnecessary and inconsistent with the Framework. Moreover, strategic policies relevant to the conservation of the built and historic environment⁵⁸, and positive strategies for the conservation and enjoyment of the historic environment⁵⁹ are items clearly more relevant to the Boroughs' other Development Plan documents.

Site C9 Pear Tree Farm, Featherbed Lane, Croydon CR0 9AA

102. As submitted, the extent of the C9 site is not accurately depicted on the illustrative map included in the Site Description. Accordingly, in the interests of the effectiveness of the Plan and to ensure its policies are justified in respect of the C9 site, **MM61** is therefore necessary which would insert amended mapping which depicts the accurate site boundary.

⁵⁴ Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR

⁵⁵ At paragraph 1.1

⁵⁶ At paragraph 16(f)

⁵⁷ Contained in paragraphs 199ff of the Framework

⁵⁸ Per paragraph 20 of the Framework

⁵⁹ Per paragraph 190 of the Framework

Conclusion on Issue 3

103. The above matters, taken together, lead us to the conclusion on this issue, that subject to the MMs mentioned, the Plan sets out an effective suite of policies for the management of waste in the area, which are justified and consistent with national policy.

Issue 4 – Does the Plan set out effective mechanisms for its implementation and monitoring?

104. Policy WP10 and the associated monitoring and contingencies table lack detail in terms of relevant management actions, are light on how the Plan's policies would be monitored, and are insufficiently clear as to how partners would be engaged in any activities that might be triggered as a result of monitoring.

105. Furthermore, the Plan identifies the scarcity of land within the Plan area as a key issue. This consideration, taken together with the London Plan's expectation⁶⁰ that any release of current waste sites should be part of a Plan-led process are indicative that the monitoring framework should be used to help to guide activity in these regards. This is of particular relevance given the Plan area's healthy position in terms of available throughput capacity. However, the monitoring framework as submitted is lacking in these regards.

106. Moreover, as worded the monitoring table is unclear (and thus contrary to the Framework⁶¹) in terms of how it would be applied to Conservation Areas – or how the air quality implications of existing sites could be taken into account as part of a wider environmental consideration of the Plan's policies. Furthermore, as submitted, it is unclear how and whether conditions compliance and Planning obligations would be monitored – issues that go to the heart of the controls that the Plan seeks to impose on new waste development, particularly in terms of its air quality and transport effects. At the hearings, we heard how new air quality monitoring technology is due to be deployed in one of the South London WPAs, and it is clear that advances in these regards could assist with monitoring the Plan.

107. Accordingly, **MM48** and **MM120** are necessary which would clarify these matters both in Policy WP10 and the Monitoring Table in the interests of the Plan's effectiveness.

108. The Plan, as submitted, does not set out a robust monitoring framework for situations where safeguarded sites that are not currently in operational use do not come onstream as anticipated. Consequently, **MM120** is necessary which would set out measures to address this in the Monitoring Table, and would ensure the effectiveness of the Plan in this regard.

⁶⁰ Set out in paragraph 9.9.2

⁶¹ At paragraph 16(d) and (f)

109. As submitted, the Plan does not provide sufficient clarity on the way that DtC partners, in particular, would participate in activities of review or updates to the Plan, or instances in which such action might be triggered. Moreover, it is unclear to what extent ongoing collaboration in these regards would assist with monitoring of cross-boundary movements over the plan period. Consequently, **MM4** and **MM120** are required which would explain the overall approach to these matters, and set out clear measures related to this in the Monitoring Table. For similar reasons, **MM46** and **MM48** are also required which would introduce appropriate reference to this matter in Policy WP10 and its supporting text. Taken together, the MMs would ensure that the Plan would be effective in these terms.
110. In order to provide an effective basis in terms of monitoring the delivery of compensatory provision **MM120** introduces additional actions focused on the availability and viability of alternative sites.
111. **MM120** would also make consequential changes to the monitoring table to address the above-referenced MMs in respect of Issues 1 to 3 to ensure the effectiveness of the Plan in these terms.
112. We have made some minor changes to **MM120**, when compared to the wording that was consulted upon to reflect recent changes to Building Regulations, and in terms of the Department of Environment, Food and Rural Affairs's biodiversity metric. As these minor changes do not introduce more onerous requirements, but merely clarify the legislative and London Plan positions on these matters, we consider that no parties' interests would be prejudiced by their inclusion at this stage. Moreover, the points were covered adequately in responses to the MM consultation.
113. Although initial analysis indicates that there were short-term changes to waste arisings⁶² occurring across the country as a result of social distancing measures pursuant to the COVID-19 pandemic, any longer-term effects of this, particularly in terms of increased working from, and deliveries to, homes, and wider economic implications are as yet uncertain. However, the monitoring framework, subject to the above-referenced MMs which we have recommended, taken together with the legislative provision⁶³ which requires planning authorities to review Plans to assess whether they need updating at least once every five years, would ensure an effective and timely response to any material changes in circumstances in these regards.

⁶² Set out particularly in Plan13 *The UK Waste Sector Covid19 Response and Resilience Report* (Chartered Institute of Wastes Management - December 2020)

⁶³ Arising from Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

Conclusion on Issue 4

114. For these reasons, and subject to the referenced MMs, we conclude on this issue that the Plan sets out effective mechanisms for its implementation and monitoring.

Overall Conclusion and Recommendation

115. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

116. The Boroughs have requested that we recommend MMs to make the Plan sound and/or legally compliant and capable of adoption. We conclude that the DtC has been met and that with the recommended MMs set out in the Appendix the South London Waste Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Stephen Normington

INSPECTOR

G J Fort

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

Annex 1 - South London Waste Plan - Draft Safeguarded Site

K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD



Site size (ha)	1.7
Type of facility	Waste Transfer Station

Type of waste	N/a
Maximum throughput tonnes per annum (tpa)	N/a
Qualifying throughput (tpa)	N/a
Licensed capacity (tpa)	N/a
Site Description	<p>Former coal and fuel depot. The existing site is laid with hardstanding and accommodates rail sidings, a number of large storage buildings, site office, parking and weighbridge. The site is located in proximity to residential properties to the north east, along Garrison Lane.</p> <p>The landowners and leaseholders are both statutory railway undertakers and have confirmed that the site is being brought forward under rail related permitted development rights to facilitate the transfer of freight by rail. A minerals and waste operator has been appointed and granted a 25 year under-lease subject to the site being in rail use.</p>
Planning Designations	South of the Borough Neighbourhood Policy (Policy SB1 of the Core Strategy 2012)
Currently Safeguarded	No
Opportunity to increase waste managed	Yes. Minerals and waste transfer operations are currently being progressed under rail related permitted development rights. As such, this will be a dual-use site, with minerals operations within the site. The size of the site may allow an opportunity to co-locate.
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts • Not harming biodiversity in the vicinity, including the Green Lane Site of Importance for Nature Conservation • Providing appropriate soft landscaping • Not prejudicing the minerals operations on site which are a complementary use • Designing a facility that takes into consideration its wider visual or landscape effect on the adjoining Green Belt.

Annex 2 – Modifications to Plan Appendix 1 Monitoring and Contingencies

Policy WP1 – Strategic Approach to household and commercial and industrial (HCI) waste

Indicator 1.1: MANAGEMENT OF HCI WASTE	<u>Household, commercial and industrial (HCI) waste managed within the plan area against the combined London Plan 2021 apportionment (tonnes per annum)</u>
Indicator 1 (for Policy WP1)	Household and Commercial and Industrial Waste Managed
Target	By 2036, 929,750 932,800 tonnes per annum by 2037 (meet combined apportionment for HCI waste)
References What it monitors	London Plan Policy: SI 8 <u>SLWP Vision: Net self-sufficiency for HCI Waste</u> <u>SLWP Plan Objectives: 1, and 3 and 4 and 8</u> <u>SLWP Policy WP1</u> <u>SA Objectives: 1, 2, 4, 9, 10 and 13</u>
Monitoring	Monitor annually against HCI target <u>using the Environment Agency’s Waste Data Interrogator (WDI)</u> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline <u>in any extant planning permissions</u> <u>Monitor the net change in the amount of available industrial land (Class B and Class E(q)) within strategic industrial locations (SILs) and locally significant industrial locations (LSILs) as a result of waste development using the GLA’s Planning London Datahub</u> <u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u> <u>Report in the Waste Authority Monitoring Report</u>
Outcomes sought	<u>That the South London Waste Plan area has sufficient capacity to meet the HCI apportionment and achieves net self-sufficiently sufficiency to 2036</u>
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry and <u>Duty to Cooperate partners</u>

Management Actions	<p>Sites closing – Contact landowners/developers/ to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB and EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output.</p> <p>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify this failure. <u>Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work. Possibly revise Consider reviewing the</u> South London Waste Plan to provide more sites in light of evidence.</p> <p><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work. Possibly revise Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that do the issue can be considered strategically.</u></p>
---------------------------	---

Policy WP2 – Strategic Approach to other forms of waste

<u>Indicator 2.1: MANAGEMENT OF C&D WASTE</u>	<u>C&D waste managed within the plan area against forecast arisings (tonnes per annum)</u>
<u>Indicator 2 (for Policy WP2)</u>	<u>Construction and Demolition Waste Managed</u>
<u>Target 2.1</u>	By 2036, 414,380 <u>415,019</u> tonnes per annum <u>by 2037 (net self-sufficiency for C&D waste)</u>
<u>References</u> <u>What it monitors</u>	<u>London Plan Policy: SI-8</u> <u>SLWP Vision: Net self-sufficiency for C&D Waste</u> <u>SLWP Plan Objective: 2 and, 3 and 4</u> <u>SLWP Policy WP2</u> <u>SA Objectives: 1, 2, 4, 9, 10 and 13</u>
<u>Monitoring</u>	Monitor annually against <u>C&D</u> target <u>using the Environment Agency’s waste data interrogator (WDI)</u> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline <u>in any extant planning permissions</u>

	<p><u>Monitor the net change in the amount of available industrial land (Class B and Class E(g)) within strategic industrial locations (SILs) and locally significant industrial locations (LSILs) as a result of waste development using the GLA's Planning London Datahub</u></p> <p><u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u></p> <p><u>Report in the Waste Authority Monitoring Report</u></p>
<u>Outcomes sought</u>	<u>That the South London Waste Plan area has sufficient capacity to meet forecast C&D waste arisings and achieves net self-sufficiently sufficiency to 2036</u>
<u>Delivery Partners</u>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <u>and Duty to Cooperate partners</u>
<u>Management Actions</u>	<p><u>Sites closing</u> – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p><u>Compensatory provision not delivered</u> – Analyse the boroughs' Development Management procedures to identify this failure. <u>Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work.</u> Possibly revise South London Waste Plan to provide more sites in light of evidence</p> <p><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work. Possibly revise South London Waste Plan in light of evidence do the issue can be considered strategically.</u></p>
<u>Indicator 2.2: MANAGEMENT OF OTHER WASTE STREAMS</u>	<u>Number of planning permissions for new radioactive, agricultural or hazardous waste Facilities (either transfer or management)</u>
<u>Indicator 3 (for Policy WP2)</u>	<u>Radioactive, Agricultural and Hazardous Waste Treated</u>
<u>Target</u>	<p>0 permissions <u>Hazardous Waste: 21,692 tonnes per annum by 2037</u></p> <p><u>Agricultural Waste: 383 tonnes per annum</u></p> <p><u>Radioactive Waste: N/a</u></p>

<p>References What it monitors</p>	<p><u>SLWP Vision: Net self-sufficiency for other waste streams</u> <u>SLWP</u> Plan Objective: 2 and 4 <u>SLWP Policy WP2(d)</u> SA Objective: 1</p>
<p>Monitoring</p>	<p>Monitor annually against targets <u>using the Environment Agency’s waste data interrogator (WDI)</u> <u>Monitor planning applications annually using the GLA’s Planning London Datahub</u> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline <u>in any extant planning permissions</u> <u>Monitor the net change in the amount of industrial land (Class B and Class E(g)) as a result of waste development using the GLA’s Planning London Datahub</u> <u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u> <u>Report in the Waste Authority Monitoring Report (AMR)</u></p>
<p>Outcomes sought</p>	<p><u>That waste arisings from other waste streams are managed without the need for additional facilities within the South London Waste Plan area, unless the requirements of WP2 (d) are met.</u></p>
<p>Delivery Partners</p>	<p>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <u>Duty to Cooperate partners</u></p>
<p>Management Actions</p>	<p><u>Sites permitted – If new facilities are being delivered on ‘windfall sites’, because safeguarded sites are not being assessed as deliverable, then investigate the reasons why. Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work</u> Analyse the boroughs’ Development Management procedures to identify this failure. Examine whether there is any unidentified need for these streams of waste. Possibly revise <u>Consider reviewing the</u> South London Waste Plan in <u>the</u> light of evidence. <u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work.</u> Possibly revise <u>Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that do the issue can be considered strategically.</u></p>

Policy WP3 – Existing Waste Sites

INDICATOR 3.1: OPERATION OF WASTE SITES	Proportion of safeguarded waste sites to be which are operational or to have had compensatory provision provided (%)
Indicator 4 (for Policy WP3 & WP4)	Existing Waste Sites Safeguarded
Target	100% of safeguarded existing waste sites to be operational or to have compensatory provision provided
References What it monitors	London Plan Policy: SI 8 <u>SLWP Vision: Managing waste efficiently and effectively</u> <u>SLWP Plan Objectives: 1, 2, 3 and 4 and 8</u> <u>SLWP Policy WP3 (a to d)</u> SA Objective: 1, <u>2 and 9</u>
Monitoring	Monitor annually against target <u>using the GLA’s Planning London Datahub</u> <u>Monitor the net change in the amount of industrial land (Class B and Class E(g)) as a result of compensatory provision using the GLA’s Planning London Datahub</u> <u>Report in Waste Authority Monitoring Report</u>
Outcomes sought	<u>That the South London Waste Plan area has sufficient capacity to meet the London Plan apportionment waste targets and meet and achieve net self-sufficiency, while retaining sufficient industrial land and premises within designated SILS and LSILs across the plan area to meet future demand for other non-waste industrial uses</u>
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. <u>Undertake or commission updated assessments of</u>

	<p><u>site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work.</u> Possibly revise South London Waste Plan to provide more sites in light of evidence.</p> <p><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work.</u> Possibly revise <u>Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that de the issue can be considered strategically.</u></p>
NEW INDICATOR 3.2: INTENSIFICATION OF WASTE SITES	<u>Number and proportion of safeguarded waste sites which have been intensified over the plan period and the increase in average throughput per hectare</u>
<u>Target</u>	<u>To increase the efficiency of waste management operations across the South London Waste Plan area in terms of the average throughput of waste managed per hectare (by waste stream and based on a rolling three-year average)</u>
<u>What it monitors</u>	<p><u>SLWP Vision: Managing waste efficiently and effectively</u></p> <p><u>SLWP Plan Objective: 4, 7 8 and 9</u></p> <p><u>SLWP Policy WP3 (b)</u></p> <p><u>SLWP Policy WP7</u></p> <p><u>SA Objectives: 3 and 4</u></p>
<u>Monitoring</u>	<p><u>Monitor annually against target using the GLA’s Planning London Datahub</u></p> <p><u>Report in Waste Authority Monitoring Report</u></p>
<u>Outcomes sought</u>	<p><u>To promote the efficient use of industrial land for waste management purposes across the South London Waste Plan area;</u></p> <p><u>To support the circular economy and minimise waste movements within the South London Waste Plan area by facilitating the co-location of complementary waste and/or industrial uses</u></p> <p><u>To retain sufficient industrial land and premises within designated SILS and LSILs across the SLWP area to meet future demand for other non-waste industrial uses (Class B and Class E[g]) and to maintain a sufficient level of vacant land necessary for ‘churn’ and a functioning land market.</u></p>

<u>Delivery Partners</u>	<u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u>
<u>Management Actions</u>	<u>Waste developments moving down the waste hierarchy - Analyse the boroughs' Development Management procedures to identify whether this is a systematic or isolated failure. Consider reviewing the South London Waste Plan to provide more sites in light of evidence.</u>
<u>INDICATOR 3.3: WASTE HIERARCHY</u>	<u>Proportion of developments on safeguarded waste sites which result in waste being managed to at least the same level in the waste hierarchy as prior to the development (%)</u>
<u>Indicator 4 (for Policy WP3 & WP4)</u>	<u>Existing Waste Sites Safeguarded</u>
<u>Target</u>	<u>100% of developments on safeguarded waste sites which result in waste being managed to at least the same level in the waste hierarchy as prior to the development</u>
<u>References What it monitors</u>	<u>London Plan Policy: SI-8</u> <u>SLWP Vision: Managing waste efficiently and effectively</u> <u>SLWP Plan Objective: 4, 7 8 and 9</u> <u>SLWP Policy WP3 (e)</u> <u>SLWP Policy WP7</u> <u>SA Objectives: 3 and 4</u>
<u>Monitoring</u>	<u>Monitor annually against target using the GLA's Planning London Datahub</u> <u>Report in Waste Authority Monitoring Report</u>
<u>Outcomes sought</u>	<u>To move waste management practices within the South London Waste Plan area up the waste hierarchy.</u>
<u>Delivery Partners</u>	<u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u>
<u>Management Actions</u>	<u>Sites closing — Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste</u>

	<p>management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p>Compensatory provision not delivered — Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Undertake or commission updated assessments of site availability/viability as necessary, either as part of existing development plan related activities or as a specific piece of work. Possibly revise South London Waste Plan to provide more sites in light of evidence.</p> <p>Waste developments moving down the waste hierarchy - Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise Consider reviewing the South London Waste Plan to provide more sites in light of evidence.</p>
--	--

Policy WP4 – Sites for Compensatory Provision

Indicator 4.1: COMPENSATORY SITES	<u>The amount of waste managed at compensatory sites compared to the amount of waste previously managed at the corresponding safeguarded sites which have been lost to other uses (tonnes per annum – based on three year rolling average for all waste streams)</u>
Indicator 4 (for Policy WP3 & WP4)	Existing Waste Sites Safeguarded
<u>Target</u>	<u>100% of compensatory sites manage at least the same amount of waste as previously managed at the corresponding safeguarded site (based on three year rolling average for all waste streams)</u>
<u>References What it monitors</u>	<p>London Plan Policy: SI 8</p> <p><u>SLWP Vision: Net self-sufficiency</u></p> <p><u>SLWP Plan Objective: 1 and 2 and 4</u></p> <p><u>SLWP Policy WP4</u></p> <p><u>SA Objective: 1</u></p>
<u>Monitoring</u>	<p><u>Monitor annually against target using the Environment Agency’s waste data interrogator (WDI), borough development monitoring procedures and the GLA’s Planning London Datahub</u></p> <p><u>Monitor the net change in the amount of industrial land (Class B and Class E(g)) as a result of waste development using the GLA’s Planning London Datahub</u></p>

	<u>Report in Waste Authority Monitoring Report</u>
<u>Outcomes sought</u>	<u>That the South London Waste Plan area has sufficient capacity to meet waste targets and net self-sufficiently.</u>
<u>Delivery Partners</u>	<u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, Duty to Cooperate partners</u>
<u>Management Actions</u>	<p><u>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</u></p> <p><u>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise South London Waste Plan to provide more sites in light of evidence.</u></p> <p><u>Significant Loss of Industrial Land – Relevant Borough(s) to undertake assessment of industrial land need, either as part of existing development plan related activities or as a specific piece of work. Possibly revise Consider reviewing the South London Waste Plan in the light of evidence in order to ensure that de the issue can be considered strategically.</u></p>

Policy WP5 – Protecting and enhancing amenity

INDICATOR 5.1: FULLY-ENCLOSED, COVERED WASTE FACILITIES	The proportion of planning permissions for intensified or compensatory waste facilities with a fully enclosed covered building (%)
Indicator 5 (for Policy WP5(b))	Compensatory or Intensified Sites with Fully Enclosed Covered Building
Target	100% of planning permissions for intensified or compensatory waste facilities have the parts of the site where unloading, loading, storage and processing takes place within a fully enclosed covered building
References What it monitors	SLWP Vision: Operational effects of sites are mitigated SLWP Plan Objective: 6 and 9 SLWP Policy WP5(b) SA Objective: 11 and 15
Monitoring	Monitor annually against target using the relevant borough development monitoring procedures and the GLA's Planning London Datahub Report in Waste Authority Monitoring Report
Outcomes sought	That the South London Waste Plan protects and enhances amenity
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why proposals on sites without a fully enclosed covered building on the parts of site where unloading, loading, storage and processing takes place have not been permitted. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence
INDICATOR 5.2: PROTECTION OF GREEN BELT, MOL AND OPEN SPACE	Number and site area of planning permissions for intensified or compensatory waste facilities located on Green Belt, Metropolitan Open Land and open space (number/hectares)

Indicator 6 (for Policy WP5(e))	Development on Green Belt, Metropolitan Open Land and Open Space
Target	0 planning permissions for intensified or compensatory waste facilities located on Green Belt, Metropolitan Open Land (MOL) and Open Space (0 ha)
References What it monitors	<u>SLWP Vision: Operational effects of sites are mitigated</u> <u>SLWP Policy WP5(b) (c)(i)</u> Plan Objectives: <u>5, 6 and 9</u> SA Objectives: <u>6, 14, 15 and 16</u>
Monitoring	Monitor annually against target <u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u> <u>Report in Waste Authority Monitoring Report</u>
Outcomes sought	<u>That waste development is directed to suitable locations and the Green Belt / Metropolitan Open Land is protected from inappropriate development.</u>
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites on Green Belt, Metropolitan Open and Open Space have been permitted. Possibly revise South London Waste Plan in light of evidence
INDICATOR 5.3: PROTECTION OF NATURE CONSERVATION AREAS	<u>Number and site area of planning permissions for intensified or compensatory waste facilities located on nationally, regionally or locally designated nature conservation areas (number/hectares)</u>
Indicator 7 (for Policy WP5(e))	Development on Nationally, Regionally or Locally Designated Nature Conservation Areas
Target	0 ha of development on <u>0 planning permissions for intensified or compensatory waste facilities located</u> on nationally, regionally or locally designated nature conservation areas (0 ha)
References What it monitors	<u>SLWP</u> Plan Objective: 6 <u>and 9</u>

	<u>SLWP Policy WP5(c)(ii)</u> SA Objective: 12
Monitoring	Monitor annually against target <u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u> <u>Report in Waste Authority Monitoring Report</u>
<u>Outcomes sought</u>	<u>That waste development is directed to suitable locations outside nationally, regionally or locally designated nature conservation areas.</u>
Delivery Partners	Greater London Authority (GLA), <u>Green Space Information for Greater London (GiGL)</u> , London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <u>and Natural England</u>
Management Actions	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why sites with nationally, regionally or locally designated Nature Conservation Areas have been permitted. Possibly revise <u>Consider reviewing the</u> South London Waste Plan in light of evidence
<u>NEW INDICATOR 5.4: BIODIVERSITY NET GAIN</u>	<u>Number and proportion of intensified or compensatory waste facilities achieving 'biodiversity net gain' as measured by the latest metric published by DEFRA (number/%)</u>
<u>Target</u>	<u>100% of planning permissions for intensified or compensatory waste facilities achieve 'biodiversity net gain' on or offsite in line with London Plan Policy G6, Mayoral Guidance and the relevant borough policy</u>
<u>What it monitors</u>	<u>SLWP Plan Objective: 5, 6 and 9</u> <u>SLWP Policy WP5(c)(ii)</u> <u>SA Objective: 12</u>
Monitoring	<u>Developers to assess and report on biodiversity net gain in line with London Plan Policy G6, Mayoral Guidance and the relevant borough policy using the latest biodiversity metric published by DEFRA (Biodiversity Net Gain 3.0 is expected by the end of 2021)</u>

	<p><u>Monitor annually against target using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></p> <p><u>Report in Waste Authority Monitoring Report</u></p>
<u>Outcomes sought</u>	<u>That the development of intensified or compensatory waste facilities within the South London Waste Plan area leaves biodiversity and habitats in a better state than before</u>
<u>Delivery Partners</u>	<u>Greater London Authority (GLA), Green Space Information for Greater London (GiGL), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry and Natural England</u>
<u>Management Actions</u>	<p><u>Analyse the boroughs' development management procedures to identify any failure to enforce the relevant planning conditions of legal agreements around biodiversity accounting</u></p> <p><u>Consider reviewing the South London Waste Plan in light of evidence</u></p>
<u>INDICATOR 5-4 5: CONSERVATION AREAS</u>	<u>Number and site area of planning permissions for intensified or compensatory waste facilities located within Conservation Areas (number/hectares)</u>
<u>Indicator 8 (for Policy WP5(c))</u>	<u>Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas</u>
<u>Target</u>	<u>0 ha of development on 0 planning permissions for intensified or compensatory waste facilities located within Conservation Areas (0 ha)</u>
<u>References</u> <u>What it monitors</u>	<p><u>SLWP Policy WP5(c)(iii)</u></p> <p>Plan Objective: <u>5, 6 and 9</u></p> <p>SA Objective: 14</p>
<u>Monitoring</u>	<p>Monitor annually against target <u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></p> <p><u>Report in Waste Authority Monitoring Report</u></p>
<u>Outcomes sought</u>	<u>That waste development does not cause harm to the historic environment.</u>
<u>Delivery Partners</u>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <u>and Historic England</u>

Management Actions	<p>Analyse the boroughs' Development Management procedures to identify any failure.</p> <p>Examine whether there are specific reasons why sites within Nationally, Regionally or Locally Designated Heritage Conservation Areas have been permitted.</p> <p>Possibly revise Consider reviewing the South London Waste Plan in the light of evidence</p>
<u>INDICATOR 5.6 5: FLOOD RISK, RIVER QUALITY AND GROUNDWATER</u>	<p><u>5.6.1 Number and proportion of planning permissions for intensified or compensatory waste facilities waste developments granted planning permission against Environment Agency advice relating to fluvial flood risk, maintaining the natural floodplain, river quality (chemical and ecological) and groundwater source protection zones (SPZs) groundwater risk and air emissions (%).</u></p> <p><u>5.6.2 Number and proportion of waste facilities incorporating buildings or structures within 8 metres of a main river or within 5 metres of an ordinary watercourse;</u></p> <p><u>5.6.3 Number and proportion of waste facilities incorporating buildings or structures located within EA Flood Zones 2 or 3;</u></p> <p><u>5.6.4 Water quality objectives (chemical and ecological) for each of the main rivers within the South London Waste Plan area set out in the EA's Thames River Basin Management Plan 2015-21 as amended;</u></p> <p><u>5.6.5 Number and proportion of waste facilities located within EA groundwater source protection zones (SPZ1 inner; SPZ2 outer and SPZ3 total catchment).</u></p>
Indicator 9 (for Policy WP5(c))	<p>Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)</p>
Target	<p>0 ha of development <u>0 planning permissions for intensified or compensatory waste facilities waste developments granted planning permission permitted</u> against Environment Agency advice</p> <p><u>0 planning permissions for intensified or compensatory waste facilities incorporate buildings or structures within 8 metres of a main river or within 5 metres of an ordinary watercourse;</u></p> <p><u>0 planning permissions for intensified or compensatory waste facilities incorporate buildings or structures within 8 metres of a main river or within 5 metres of an ordinary watercourse</u></p> <p><u>Each of the main rivers within the South London Waste Plan area is assessed as having 'good' chemical and 'good' ecological status.</u></p>

	<u>0 planning permissions located within EA groundwater source protection zones (SPZ1 inner; SPZ2 outer and SPZ3 total catchment).</u>
<u>References</u> <u>What it monitors</u>	<u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u> <u>SLWP Plan Objectives: 5, 6 and 9</u> <u>SLWP Policy WP5(c)(v)</u> SA Objective: <u>6, 7, 8, 11 and 15</u>
<u>Monitoring</u>	Monitor annually against target <u>using the relevant borough development monitoring procedures, and the GLA's Planning London Datahub and Environment Agency river quality monitoring data</u> <u>Report in Waste Authority Monitoring Report</u>
<u>Outcomes sought</u>	<u>That waste development contributes to reduce the impacts of climate change, and does not cause harm to the environment and communities by increasing flood risk or adversely affecting river or groundwater quality.</u>
<u>Delivery Partners</u>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <u>South East Rivers Trust (formerly Wandle Trust)</u>
<u>Management Actions</u>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted contrary to Environment Agency advice. <u>Possibly revise South London Waste Plan in light of evidence</u>
<u>INDICATOR 5.7: AIR QUALITY INDICATORS</u>	<u>5.7.1 NITROGEN DIOXIDE (NO₂): Monitored NO₂ levels at roadside locations adjacent to or in close proximity to operational waste sites (µg/m³)</u> <u>5.7.2 PARTICULATES (PM10): Monitored PM10¹ levels at roadside locations adjacent to or in close proximity to operational waste sites (µg/m³)</u> <u>5.7.3 AIR QUALITY FOCUS AREAS : number and proportion of planning permissions for intensified or compensatory waste facilities located within or in close proximity to Air Quality Focus Areas</u>

¹ PM10s = particulate matter less than 10 microns in size

	<p><u>5.7.4 AIR QUALITY NEUTRALITY: Number and proportion of planning permissions for intensified or compensatory waste facilities achieving 'Air Quality Neutral' benchmarks as defined by the Mayor²</u></p> <p><u>5.7.5 POST IMPLEMENTATION MONITORING: Number and proportion of planning permissions for intensified or compensatory waste facilities which incorporate conditions and/or legal agreements to secure arrangements for post-implementation monitoring and annual reporting of local air quality and polluting emissions;</u></p> <p><u>5.7.6 ENFORCEMENT ACTION: Number of enforcement actions taken against waste sites by the Boroughs and/or Environment Agency on breach of planning permissions, conditions or environmental permits</u></p>
<p><u>Targets</u></p>	<p><u>5.7.1 NITROGEN DIOXIDE (NO₂): 40 µg/m³ as an annual mean and 200 µg/m³ as a 1-hour mean exceeded no more than 18 days per year based on both automatic monitoring sites forming part of the London Air Quality Network (LAQN) and any non-automatic diffusion tube networks either run by the relevant borough.</u></p> <p><u>5.7.2 PARTICULATES (PM10): 40 µg/m³ as an annual mean and 50 µg/m³ as a 24-hr mean not to be exceeded more than 35 days/year)</u></p> <p><u>5.7.3 AIR QUALITY FOCUS AREAS: 0 planning permissions for intensified or compensatory waste facilities located within or adjacent in close proximity to Air Quality Focus Areas</u></p> <p><u>5.7.4 AIR QUALITY NEUTRALITY: 100% of planning permissions for intensified or compensatory waste facilities achieve 'Air Quality Neutral' benchmarks as defined by the Mayor³</u></p> <p><u>5.7.5 POST IMPLEMENTATION MONITORING: Where necessary and where the tests set out in National Planning Practice Guidance (NPPG) for the use of planning obligations are met, 100% of planning permissions for intensified or compensatory waste facilities include conditions and/or legal agreements to secure arrangements for post-implementation monitoring and annual reporting of local air quality and polluting emissions;</u></p> <p><u>5.7.6 ENFORCEMENT ACTION: Enforcement investigation is undertaken by the Boroughs and/or Environment Agency in 100% of cases where a breach of planning control or environmental permit is reported</u></p>

³ 'air quality neutral' standards are defined in the Mayor's supplementary planning guidance (SPG) on Sustainable design and Construction (GLA, 2014)

<u>References</u>	<u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u>
<u>What it monitors</u>	<u>SLWP Plan Objective: 5, 6 and 9</u> <u>SLWP Policy WP5(c)(vi)</u> <u>SA Objective: 7, 10, 11, 15 and 16</u>
<u>Monitoring</u>	<u>Monitor annually against targets using the relevant borough development monitoring procedures; and available data from the Environment Agency data; the London Air Quality Network (https://www.londonair.org.uk/); and annual Air Quality Status Reports published by each local authority and any additional local monitoring networks⁴ that may be introduced in the vicinity of industrial locations and/or operational waste sites (typically consisting of NO₂ diffusion tubes).</u> <u>Report in Waste Authority Monitoring Report and annual Air Quality Status Reports published by each local authority.</u>
<u>Outcomes sought</u>	<u>That polluting emissions from the construction and operation of waste sites and associated transport movements do not cause an exceedance of national and regional air quality objectives and are minimised to acceptable levels that do not cause undue harm are not harming to the environment or local communities</u>
<u>Delivery Partners</u>	<u>South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u>
<u>Management Actions</u>	<u>Contact landowners/developers to identify whether it is an ongoing systemic failure or a one-off, isolated failures, and verify the extent to which the failure is exclusively due to ongoing waste operations on site or the waste operator's vehicles. If the failure is ongoing and systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If a one-off and isolated failure, work with landowners/developers to facilitate waste management output</u> <u>Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP's policies and safeguarded sites.</u>

⁴ an example of a local air quality monitoring network is the roll out of low-cost air quality and traffic monitors as part of the South London Partnership funded InnOvaTe (Internet Of Things) project. When completed there will be up to 68 traffic sensors (Vivacity) co-located with 68 air quality monitors ('Breathe London Nodes') which will for the first time link traffic and air quality data together in real-time. The planned network will cover a range of key locations within the Borough with potential air quality issues including in the vicinity of industrial locations and waste sites. LB Merton has recently applied for additional InnOvaTe funding in order to provide additional air quality monitoring along the length of Weir Road.

Policy WP6 – Sustainable design and construction of waste facilities

INDICATOR 6.1: BREEAM AND CEEQUAL RATINGS	The proportion of planning permissions for intensified or compensatory waste facilities achieving a BREEAM and/or CEEQUAL 'Excellent' rating (%)
Indicator 10 (for Policy WP6)	Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating
Target	100% of planning permissions for intensified or compensatory waste facilities achieve a BREEAM and/or CEEQUAL 'Excellent' rating
References What it monitors	SLWP Vision: Managing waste efficiently and effectively and effects mitigated. SLWP Plan Objective: 5 and 6 SLWP Policy WP6(a) SA Objective: 8
Monitoring	Monitor annually against target using the relevant borough development monitoring procedures Submission of BREEAM and/or CEEQUAL 'design-stage' and 'post-construction' certificates to the relevant local planning authority at the pre-commencement and pre occupation stages respectively Report in Waste Authority Monitoring Report
Outcomes sought	That new waste facilities are built to the highest standards of sustainable design and construction a high sustainability standard and are contributing to reducing the impacts of climate change
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, Building Research Establishment
Management Actions	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why waste facilities are not achieving BREEAM and/or CEEQUAL 'Excellent' sites without a fully enclosed covered building have not been permitted. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence

INDICATOR 6.2: CARBON EMISSIONS	<u>Net carbon dioxide (CO₂) reductions delivered by waste management facilities compared to Part L of the 2013 Building Regulations (% and tonnes per annum)</u>
<u>Targets</u>	<p><u>100% of planning permissions for intensified or compensatory waste developments achieving at least a 35% on-site reduction in CO₂ emissions in accordance with relevant London Plan targets compared to Part L2A of the 2013 Building Regulations;</u></p> <p><u>100% of permissions for major waste related developments achieve 'zero carbon' standards in line with Policy SI 2 of the London Plan 2021 by offsetting remaining CO₂ emissions through developer contributions to fund carbon reduction measures elsewhere;</u></p>
<u>References What it monitors</u>	<p><u>London Plan Policy SI 2</u></p> <p><u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u></p> <p><u>SLWP Plan Objective: 5 and 6</u></p> <p><u>SLWP Policy WP6(b)</u></p> <p><u>SA Objective: 5</u></p>
<u>Monitoring</u>	<p><u>Monitor annually against target using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></p> <p><u>Submission of energy statements, 'as-designed' and 'as-built' simplified building energy model (SBEM) certificates to the relevant local planning authority at the planning application, pre-commencement and pre occupation stages respectively</u></p> <p><u>Report in Waste Authority Monitoring Report</u></p>
<u>Outcomes sought</u>	<u>That new waste facilities delivering reduced CO₂ emissions and are contributing to reducing the impacts of climate change</u>
<u>Delivery Partners</u>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<u>Management Actions</u>	<p><u>Analyse the boroughs' development management procedures to identify any failure</u></p> <p><u>Examine whether there are specific reasons why permitted waste developments have not met the relevant targets for reducing CO₂ emissions and carbon offsetting</u></p> <p><u>Possibly provide design guidance</u></p>

<u>INDICATOR 6.3: EMBODIED CARBON</u>	<u>Number and proportion of waste facilities minimising embodied carbon emissions using a nationally recognised Whole Life-Cycle Carbon Assessment (WLC) methodology (%)</u>
<u>Targets</u>	<u>100% of planning permissions for intensified or compensatory waste developments minimise embodied carbon emissions using a nationally recognised WLC methodology</u>
<u>References What it monitors</u>	<u>London Plan Policy SI 2</u> <u>SLWP Vision: Managing waste efficiently and effectively and effects mitigated.</u> <u>SLWP Plan Objective: 5</u> <u>SLWP Policy WP6(b)</u> <u>SA Objectives: 4 and 5</u>
<u>Monitoring</u>	<u>Monitor annually against target using the relevant borough development monitoring procedures</u> <u>Submission of appropriate WLC certification to the relevant local planning authority at both the pre-commencement and pre occupation stages</u> <u>Report in Waste Authority Monitoring Report</u>
<u>Outcomes sought</u>	<u>That new waste facilities minimising embodied carbon emissions and contributing to reducing the impacts of climate change</u>
<u>Delivery Partners</u>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<u>Management Actions</u>	<u>Analyse the boroughs' development management procedures to identify any failure</u> <u>Examine whether there are specific reasons why permitted waste developments have not achieved WLC certification</u>

Policy WP7 – The benefits of waste (promoting the circular economy)

INDICATOR 7.1: CIRCULAR ECONOMY	<p><u>7.1.1 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which are supported by a Circular Economy Statement in line with London Plan Policy SI 8 (%)</u></p> <p><u>7.1.2 Permissions for intensified or compensatory waste facilities which are co-located with complimentary waste or industrial operations/ facilities (%)</u></p> <p><u>7.1.3 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which achieve 'net zero waste' as defined in the Mayor's Draft Circular Economy Statement Guidance (%)</u></p> <p><u>7.1.4 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which specify and source materials and other resources sustainably based on the Mayor's Circular Economy Statement Guidance</u></p> <p><u>7.1.5 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which prioritise refurbishment or 're-purposing' of the existing building on site (as defined in the Mayor's Circular Economy Statement Guidance)</u></p> <p><u>7.1.6 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which include a completed 'Bill of Materials'⁵ as defined in the Mayor's Circular Economy Statement Guidance.</u></p> <p><u>7.1.7 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which identify opportunities for the use of reused or recycled materials and set individual targets of at least 20% by value of materials</u></p> <p><u>7.1.8 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which include minimum targets for material intensity (kg/m²) - for structure, skin and space layers</u></p> <p><u>7.1.9 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which include minimum targets for recycled content for structure, skin and space layers as a minimum (% by value)</u></p>
--	--

⁵ The 'Bill of Materials' must contain estimates of the quantity of materials used in each 'layer' of the building (kg), material 'intensity' (kg/m²) and set targets for the minimum amount of recycled content to be used (% by value)

	<p><u>7.1.10 Permissions for intensified or compensatory waste facilities (and other major non-waste developments) which are supported by a Recycling and Waste Reporting Form⁶</u></p> <p><u>7.1.11 The increase in the proportion of HCI waste and C&D waste re-used and/or recycled on existing waste transfer stations within the plan area</u></p> <p><u>7.1.12 The proportion of HCI and C&D waste arisings within the SLWP area which are exported out of the plan area prior to reuse or recycling (minimise)</u></p> <p><u>7.1.13 Monitoring of waste recovery indicators and targets in Mayor’s Environment Strategy 2018:</u></p> <ul style="list-style-type: none"> • <u>Percentage of HCI waste arisings recycled by 2030;</u> • <u>Percentage of local authority collected waste (LACW) HCI waste arisings recycled by 2030;</u> • <u>Percentage of business waste arisings recycled by 2030</u> • <u>Percentage of excavation waste going to beneficial use</u> • <u>Percentage of C&D waste going to beneficial use</u>
<p>Targets</p>	<p><u>7.1.1 100% of permissions are supported by a Circular Economy Statement in line with London Plan Policy SI 8 (%)</u></p> <p><u>7.1.2 Increase in the number of intensified or compensatory waste facilities which are co-located with complimentary waste or industrial operations/ facilities (%)</u></p> <p><u>7.1.3 100% of permissions achieve ‘net zero waste’</u></p> <p><u>7.1.4 100% of permissions specify and source materials and other resources sustainably</u></p> <p><u>7.1.5 Where there is an existing building on site, 100% of permissions prioritise refurbishment or ‘re-purposing’ of the existing building on site</u></p> <p><u>7.1.6 100% of permissions include a completed ‘Bill of Materials’</u></p> <p><u>7.1.7 100% of permissions set individual recycling targets of at least 20% by value of materials</u></p> <p><u>7.1.8 100% of permissions include minimum targets for material intensity (kg/m²) - for structure, skin and space layers</u></p> <p><u>7.1.9 100% of permissions include minimum targets for recycled content for structure, skin and space layers as a minimum (% by value)</u></p>

⁶ Waste and Recycling Forms must contain (i) estimates of the total amount of waste/ material generated during excavation, demolition, construction and operation (ii) how much will be reused or recycled onsite, reused or recycled offsite, or sent to landfill (iii) defined activities and targets relating to the relevant London Plan policy targets; and (iv) a commitment to monitor post implementation (% reused/ recycled)

	<p><u>7.1.10 100% of permissions are supported by a Recycling and Waste Reporting Form</u></p> <p><u>7.1.11 A year on year increase in the proportion of HCI waste and C&D waste re-used and/or recycled on existing waste transfer stations</u></p> <p><u>7.1.12 A year on year reduction in the proportion of HCI and C&D waste arisings which are exported out of the plan area prior to reuse or recycling</u></p> <p><u>7.1.13 Waste recovery targets:</u></p> <ul style="list-style-type: none"> • <u>65% of HCI waste arisings recycled by 2030;</u> • <u>50% of LACW waste recycled by 2030;</u> • <u>75% of business waste arisings recycled by 2030</u> • <u>95% of excavation waste going to beneficial use</u> • <u>95% of C&D waste going to beneficial use</u>
<u>References</u>	<p><u>Plan Objective: 5, 6, 7, 8 and 9</u></p> <p><u>SLWP Policy WP7</u></p> <p><u>SA Objective: 4</u></p>
<u>Monitoring</u>	<p><u>Monitor annually against target using the relevant borough development monitoring procedures and analysis of approved Circular Economy Statements</u></p> <p><u>Report in Waste Authority Monitoring Report</u></p>
<u>Delivery Partners</u>	<p><u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Partnership, South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry,</u></p>
<u>Management Actions</u>	<p><u>Analyse the boroughs' development management procedures to identify any failure.</u></p>

Indicator 7.1	<u>The proportion of planning permissions for intensified or compensatory waste facilities involving energy from waste (%)</u>
Indicator 11 (for Policy WP7)	Development involving Energy from Waste
Target	0 <u>planning permissions for intensified or compensatory waste facilities involve energy from waste</u>
References	Plan Objective: 6 <u>SLWP Policy WP7</u> <u>SA Objective: 5</u>
Monitoring	Monitor annually against target <u>using the relevant borough development monitoring procedures</u> <u>Report in Waste Authority Monitoring Report</u>
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <u>South London Waste Partnership</u> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry,
Management Actions	Analyse the boroughs' development management procedures to identify any failure.

SLWP Main Modifications Annex 3 – Changes to Appendix 2

- ~~Strikethrough~~ text indicates a proposed deletion.
- **Bold Underlined** indicates a proposed addition to the text.
- Please note, this completely supersedes previous changes that were put forward as part of SWLP07

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
Croydon Capacity					
C1	Able Waste Services	<u>56,699</u>	0	43,268 <u>53,524</u>	
C4	Days Aggregates Purley Depot	<u>179,300</u>	0	178,593 <u>179,300</u>	
C5A	Factory Lane Waste Transfer Station		0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre Site	<u>19,736</u>	9,623 <u>10,775</u>	5,206 <u>4,718</u>	<u>9+</u>
C6	Fishers Farm Reuse and Recycling Centre	<u>6,895</u>	4,542 <u>4,077</u>	0 <u>1,517</u>	
C7	Henry Woods Waste Management	<u>13,025</u>	0	0	
C8	New Era Metals	<u>20,104</u>	4,213 <u>10,358</u>	0 <u>3,327</u>	
C9	Peartree Farm	<u>59,282</u>	0	0 <u>33</u>	
C10	Purley Oaks Reuse and Recycling Centre	<u>9,099</u>	6,684 <u>5,658</u>	0 <u>1,911</u>	
C11	SafetyKleen	-	0 <u>39</u>	0	Yes
C12	Stubbs Mead Depot	<u>13,505</u>	0 <u>13,471</u>	0	<u>Yes</u>
C13	Solo Wood Recycling	<u>9,099</u>	5,000	0	
CEX	Exempt Sites	-	2,580	0	
	Croydon Total	<u>386,744</u>	32,883 <u>51,919</u>	227,067 <u>244,330</u>	
Kingston Capacity					
K2	Genuine Solutions Group	<u>342</u>	1,630 <u>277</u>	0	
K3	Kingston Reuse and Recycling Centre	<u>13,443</u>	9,392 <u>7,631</u>	0 <u>2,823</u>	
K4	Kingston Waste Transfer Station	<u>68,297</u>	19,620 <u>40,254</u>	0	<u>Yes</u>
K5	<u>Chessington Railhead</u>	-	<u>0</u>	<u>0</u>	<u>Yes</u>

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
KEX	Exempt Sites	-	5,000	0	
	Kingston Total	<u>82,082</u>	35,642 <u>53,162</u>	0 <u>2,823</u>	
Merton Capacity					
M1	B&T@Work	<u>3,729</u>	0	0	
M2	European Metal Recycling	<u>65,050</u>	70,100 <u>46,242</u>	0 <u>1,301</u>	
M3	Deadman Confidential	<u>5,000</u>	9,866 5,000	0	Yes
M4	Garth Road Reuse and Recycling Centre	<u>14,594</u>	15,704 <u>8,433</u>	0 <u>3,065</u>	
M5	Garth Road Transfer Station	<u>22,642</u>	0 15,704 <u>20,028</u>	0 <u>453</u>	
M6	George Killoughery	<u>35,840</u>	0	0 <u>717</u>	
M7	LMD Waste Management (Abbey Industrial Estate)	<u>38,459</u>	0	20,774 <u>38,459</u>	
M8	LMD Waste Management (Wandle Way)	<u>56,920</u>	0	33,845 <u>56,920</u>	
M9	Maguire Skips	<u>67,719</u>	0	0	<u>Yes</u>
M10	Powerday	<u>53,313</u>	0	42,856 <u>24,981</u>	
M11	Morden Transfer Station	<u>43,564</u>	0 <u>746</u>	0 <u>5,534</u>	
M12	NJB Recycling	<u>48,687</u>	0	18,030 <u>45,058</u>	
M13	One Waste Clearance	<u>55,665</u>	13,453 0	4,547 <u>54,887</u>	
M14	Reston Waste Transfer and Recovery	<u>71,595</u>	0	30,131 <u>46,007</u>	
M15	Riverside AD Facility	<u>60,585</u>	46,341 <u>60,585</u>	0	
M16	Riverside Bio Waste Treatment Centre	<u>58,191</u>	51,715 <u>58,191</u>	0	
M17	UK and European (Ranns) Construction	<u>804</u>	0	0	<u>Yes</u>
M18	Wandle Waste Management	<u>677</u>	0 <u>30</u>	0	
MEX	Exempt Sites	-	1,000	0	
	Merton Total	<u>703,034</u>	213,179 <u>200,255</u>	150,183 <u>277,382</u>	
Sutton Capacity					

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
S1	777 Recycling	-	20,625 2,044	32,972 9,991	
S2	Beddington Farmlands Energy Recovery Facility	<u>279,696</u>	275,000	0	
S3	Cannon Hygiene	<u>9,601</u>	0 <u>635</u>	0	<u>Yes</u>
S4	Croydon Transfer Station	<u>32,448</u>	21,113 <u>30,826</u>	0 <u>811</u>	Yes
S5	Hinton Skips	<u>35,639</u>	5,381 <u>3,564</u>	1,819 <u>32,075</u>	Yes
S6	Hydro Cleansing	<u>18,244</u>	0 <u>9,567</u>	0 <u>1,204</u>	
S7	Kimpton Reuse and Recycling Centre	<u>14,799</u>	8,640 <u>8,068</u>	0 <u>3,108</u>	
S8	King Concrete	<u>1,200</u>	0	0 <u>400</u>	Yes
S9	Premier Skip Hire	<u>4,036</u>	8,072 <u>222</u>	2,728 <u>898</u>	
S10*	Raven Recycling	<u>19,874</u>	5,310 <u>7,222</u>	5,506 <u>5,161</u>	
S11	TGM Environmental	-	15,000	0	
S12	Beddington Resource Recovery Facility	<u>305,000</u>	305,000	0	
S13	Exempt Sites		500	0	
	Sutton Total	749,044 <u>720,537</u>	664,641 642,647 <u>640,604</u>	43,025 53,648 <u>43,657</u>	
South London Capacity					
	Croydon	<u>386,744</u>	32,883 <u>51,919</u>	227,067 <u>244,330</u>	
	Kingston	<u>82,082</u>	35,642 <u>53,162</u>	0 <u>2,823</u>	
	Merton	<u>703,034</u>	213,179 <u>200,225</u>	150,183 <u>277,382</u>	
	Sutton	<u>720,537</u>	664,641 <u>640,604</u>	43,025 <u>43,657</u>	
	South London Total	<u>1,892,397</u>	946,345 <u>945,910</u>	420,275 <u>568,192</u>	
South London Capacity Against Target					
	South London Capacity	-	946,345 <u>945,910</u>	420,275 <u>568,192</u>	
	South London Target	-	929,750 <u>932,800</u>	414,380 <u>415,019</u>	
	South London Capacity against Target	-	+16,565 <u>+13,110</u>	+5,895 <u>+153,173</u>	

All safeguarded sites are listed in the table, including those that at the time of publication did not contribute towards the Apportionment and C&D Target. However, these sites have potential to contribute to waste targets in future years if the amount of waste managed onsite increases e.g. through intensification.

SLWP Main Modifications Annex 2 – Clean Version

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
Croydon Capacity					
C1	Able Waste Services	56,699	0	53,524	
C4	Days Aggregates Purley Depot	179,300	0	179,300	
C5A	Factory Lane Waste Transfer Station	19,736	0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre Site		10,775	4,718	Yes
C6	Fishers Farm Reuse and Recycling Centre	6,895	4,077	1,517	
C7	Henry Woods Waste Management	13,025	0	0	
C8	New Era Metals	20,104	10,358	3,327	
C9	Peartree Farm	59,282	0	33	
C10	Purley Oaks Reuse and Recycling Centre	9,099	5,658	1,911	
C12	Stubbs Mead Depot	13,505	13,471	0	Yes
C13	Solo Wood Recycling	9,099	5,000	0	
CEX	Exempt Sites	-	2,580	0	
	Croydon Total	386,744	51,919	244,330	
Kingston Capacity					
K2	Genuine Solutions Group	342	277	0	
K3	Kingston Reuse and Recycling Centre	13,443	7,631	2,823	
K4	Kingston Waste Transfer Station	68,297	40,254	0	Yes
K5	Chessington Railhead	-	0	0	Yes
KEX	Exempt Sites	-	5,000	0	
	Kingston Total	82,082	53,162	2,823	
Merton Capacity					
M1	B&T@Work	3,729	0	0	

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
M2	European Metal Recycling	65,050	46,242	1,301	
M3	Deadman Confidential	5,000	5,000	0	Yes
M4	Garth Road Reuse and Recycling Centre	14,594	8,433	3,065	
M5	Garth Road Transfer Station	22,642	20,028	453	
M6	George Killoughery	35,840	0	717	
M7	LMD Waste Management (Abbey Industrial Estate)	38,459	0	38,459	
M8	LMD Waste Management (Wandle Way)	56,920	0	56,920	
M9	Maguire Skips	67,719	0	0	Yes
M10	Powerday	53,313	0	24,981	
M11	Morden Transfer Station	43,564	746	5,534	
M12	NJB Recycling	48,687	0	45,058	
M13	One Waste Clearance	55,665	0	54,887	
M14	Reston Waste Transfer and Recovery	71,595	0	46,007	
M15	Riverside AD Facility	60,585	60,585	0	
M16	Riverside Bio Waste Treatment Centre	58,191	58,191	0	
M17	UK and European (Ranns) Construction	804	0	0	Yes
M18	Wandle Waste Management	677	0	0	
MEX	Exempt Sites	-	1,000	0	
	Merton Total	703,034	200,255	277,382	
Sutton Capacity					
S2	Beddington Farmlands Energy Recovery Facility	279,696	275,000	0	
S3	Cannon Hygiene	9,601	635	0	Yes
S4	Croydon Transfer Station	32,448	30,826	811	Yes
S5	Hinton Skips	35,639	3,564	32,075	Yes
S6	Hydro Cleansing	18,244	9,567	1,204	

Ref	Name	Maximum Throughput 2015-19	Qualifying Throughput		Potential for Intensification
			HC&I	C&D	
S7	Kimpton Reuse and Recycling Centre	14,799	8,068	3,108	
S8	King Concrete	1,200	0	400	Yes
S9	Premier Skip Hire	4,036	222	898	
S10	Raven Recycling	19,874	7,222	5,161	
S12	Beddington Resource Recovery Facility	305,000	305,000	0	
S13	Exempt Sites		500	0	
	Sutton Total	720,537	640,404	43,657	
South London Capacity					
	Croydon	386,744	51,919	244,330	
	Kingston	82,082	53,162	2,823	
	Merton	703,034	200,225	277,382	
	Sutton	720,537	640,604	43,657	
	South London Total	1,892,397	945,910	568,192	
South London Capacity against Target					
	South London Capacity	-	945,910	568,192	
	South London Target	-	932,800	415,019	
	South London Capacity against Target	-	+13,110	+153,173	

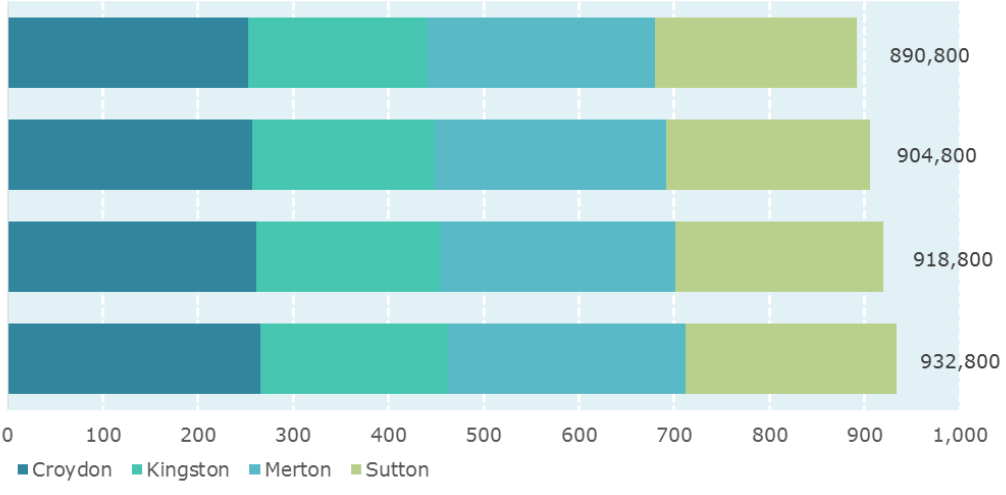
All safeguarded sites are listed in the table, including those that at the time of publication did not contribute towards the Apportionment and C&D Target. However, these sites have potential to contribute to waste targets in future years if the amount of waste managed onsite increases e.g. through intensification.

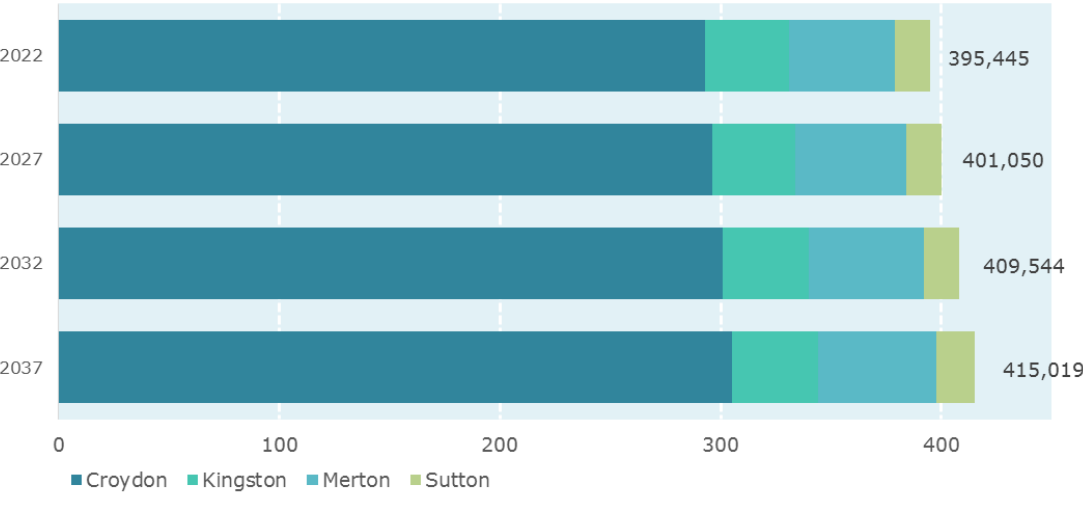
Appendix - Main Modifications to the Draft South London Waste Plan

- ~~Strikethrough~~ text indicates a proposed deletion.
- **Bold Underlined** indicates a proposed addition to the text.
- denotes the presence of intervening text

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM1.1	1	Para 1.1 1 st sentence	The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 <u>2022</u> to 2036 <u>2037</u> .
MM1	1	Insert new paragraph after 1.4	After para 1.3, insert: <u>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.</u>
MM2	3	Para 2.1 Final sentence	"This South London Waste Plan is the replacement document and covers the period 2021 <u>2022</u> to 2036 <u>2037</u> and <u>supersedes the 2012 South London Waste Plan. A list of superseded policies is set out in Appendix 5</u> ".
MM3	5	Para 2.11 Third bullet	<ul style="list-style-type: none"> • 95% of construction, demolition and excavation waste to be recycled by 2020 <u>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 adaption/mitigation or landfill restoration.</u>
MM4	10	Para 3.8	Add: 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. <u>Similarly, HCI waste sent to the Redhill Landfill site is due to be managed in Beddington, following the planned closure of the landfill</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p><u>in 2027.</u> 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. <u>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.</u></p>
MM5	12	Para 3.11	<p>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. <u>No planning issues have been identified which will prevent the continued cross-boundary movements of waste</u> and the achievement of this task can be seen in the Statements of Cooperation which accompany this plan. <u>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'</u></p>
MM5.1	13	Figure 7	Replace Figure 7 with the update version below:

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																														
			<p data-bbox="994 204 1854 225">Figure 7 Household, Commercial & Industrial Waste Targets (thousand tonnes)</p>  <table border="1" data-bbox="1043 244 2045 740"> <caption>Figure 7 Household, Commercial & Industrial Waste Targets (thousand tonnes)</caption> <thead> <tr> <th>Year</th> <th>Croydon</th> <th>Kingston</th> <th>Merton</th> <th>Sutton</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>250,000</td> <td>180,000</td> <td>240,000</td> <td>220,800</td> <td>890,800</td> </tr> <tr> <td>2027</td> <td>255,000</td> <td>185,000</td> <td>245,000</td> <td>229,800</td> <td>904,800</td> </tr> <tr> <td>2032</td> <td>260,000</td> <td>190,000</td> <td>250,000</td> <td>238,800</td> <td>918,800</td> </tr> <tr> <td>2037</td> <td>265,000</td> <td>195,000</td> <td>255,000</td> <td>247,800</td> <td>932,800</td> </tr> </tbody> </table>	Year	Croydon	Kingston	Merton	Sutton	Total	2022	250,000	180,000	240,000	220,800	890,800	2027	255,000	185,000	245,000	229,800	904,800	2032	260,000	190,000	250,000	238,800	918,800	2037	265,000	195,000	255,000	247,800	932,800
Year	Croydon	Kingston	Merton	Sutton	Total																												
2022	250,000	180,000	240,000	220,800	890,800																												
2027	255,000	185,000	245,000	229,800	904,800																												
2032	260,000	190,000	250,000	238,800	918,800																												
2037	265,000	195,000	255,000	247,800	932,800																												
MM6	14	Para 3.16	<p data-bbox="965 874 2033 991">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</u> 95% of Construction and Demolition Waste by 2020:</p>																														
MM6.1	14	Figure 8	<p data-bbox="965 1061 1552 1082">Replace Figure 8 with the update version below:</p>																														


MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																														
			<p data-bbox="972 209 1760 233">Figure 8 Construction and Demolition Waste Targets (thousand tonnes)</p>  <table border="1" data-bbox="972 248 2051 756"> <caption>Figure 8 Construction and Demolition Waste Targets (thousand tonnes)</caption> <thead> <tr> <th>Year</th> <th>Croydon</th> <th>Kingston</th> <th>Merton</th> <th>Sutton</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>~295</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>395,445</td> </tr> <tr> <td>2027</td> <td>~300</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>401,050</td> </tr> <tr> <td>2032</td> <td>~305</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>409,544</td> </tr> <tr> <td>2037</td> <td>~310</td> <td>~35</td> <td>~55</td> <td>~10</td> <td>415,019</td> </tr> </tbody> </table>	Year	Croydon	Kingston	Merton	Sutton	Total	2022	~295	~35	~55	~10	395,445	2027	~300	~35	~55	~10	401,050	2032	~305	~35	~55	~10	409,544	2037	~310	~35	~55	~10	415,019
Year	Croydon	Kingston	Merton	Sutton	Total																												
2022	~295	~35	~55	~10	395,445																												
2027	~300	~35	~55	~10	401,050																												
2032	~305	~35	~55	~10	409,544																												
2037	~310	~35	~55	~10	415,019																												
MM7	19	Para 4.2	<p data-bbox="958 855 2029 911">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></p> <ul data-bbox="958 943 2011 1342" style="list-style-type: none"> <li data-bbox="958 943 2011 1062">• Objective 1: <u>To plan for net self-sufficiently by</u> Meet the 2019 ItP London Plan meeting the 2021 London Plan target for Household and Commercial and industrial waste. <u>To be delivered through Policies WP1, WP3 and WP4.</u> <li data-bbox="958 1094 2011 1214">• Objective 2: : <u>To plan for net self-sufficiently by meeting</u> Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural, where practical or necessary. <u>To be delivered through Policies WP2, WP3 and WP4.</u> <li data-bbox="958 1246 2011 1342">• 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. <u>To be delivered through Policies WP3 and WP4.</u> 																														

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																			
			<ul style="list-style-type: none"> • Objective 4: Ensure there is <u>Support the need for</u> sufficient land for other industrial uses within the South London Waste Plan area's industrial estates <u>by not safeguarding more land for waste management than is required.</u> <u>To be delivered through Policies WP1, WP2, WP3 and WP4.</u> • Objective 5: Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity: <u>the character and appearance of its surroundings.</u> <u>To be delivered through Policies WP4, WP5, WP6, WP7, WP8 and WP9.</u> • Objective 6: Ensure the effects of new development are mitigated and, where possible, enhance amenity. <u>To be delivered through Policies WP4, WP5, WP6, WP8 and WP9.</u> • <u>Objective 7: To support the movement of waste as far up the waste hierarchy as practicable.</u> <u>To be delivered through Policies WP3 and WP7</u> • <u>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.</u> <u>To be delivered through Policies WP1, WP2, WP3, WP4, WP5 and WP7</u> • <u>Objective 9: To ensure the delivery of sustainable waste development within South London through the integration of social, environmental and economic considerations.</u> <u>To be delivered through Policies WP1 to WP9</u> 																			
MM7.1	22	Figure 11	<p>Replace Figure 11 with the update version below:</p> <p>Figure 11 Arisings and Apportionment at 2022 and 2037</p> <table border="1" data-bbox="938 1157 2056 1394"> <thead> <tr> <th data-bbox="938 1157 1137 1225" rowspan="2">Borough</th> <th colspan="2" data-bbox="1137 1157 1655 1225">2022</th> <th colspan="2" data-bbox="1655 1157 2056 1225">2037</th> </tr> <tr> <th data-bbox="1137 1225 1279 1278">Arisings</th> <th data-bbox="1279 1225 1655 1278">Apportionment</th> <th data-bbox="1655 1225 1796 1278">Arisings</th> <th data-bbox="1796 1225 2056 1278">Apportionment</th> </tr> </thead> <tbody> <tr> <td data-bbox="938 1278 1137 1331">Croydon</td> <td data-bbox="1137 1278 1279 1331">306,100</td> <td data-bbox="1279 1278 1655 1331">252,800</td> <td data-bbox="1655 1278 1796 1331">322,600</td> <td data-bbox="1796 1278 2056 1331">264,800</td> </tr> <tr> <td data-bbox="938 1331 1137 1394">Kingston</td> <td data-bbox="1137 1331 1279 1394">152,400</td> <td data-bbox="1279 1331 1655 1394">187,600</td> <td data-bbox="1655 1331 1796 1394">158,400</td> <td data-bbox="1796 1331 2056 1394">196,600</td> </tr> </tbody> </table>	Borough	2022		2037		Arisings	Apportionment	Arisings	Apportionment	Croydon	306,100	252,800	322,600	264,800	Kingston	152,400	187,600	158,400	196,600
Borough	2022		2037																			
	Arisings	Apportionment	Arisings	Apportionment																		
Croydon	306,100	252,800	322,600	264,800																		
Kingston	152,400	187,600	158,400	196,600																		

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification											
			Merton	Sutton	Total									
			174,500	238,750	182,000	250,000								
			161,550	211,650	169,800	221,400								
			794,550	890,800	832,800	932,800								
MM8	23	Figure 13	<p>Replace Figure 13 with the update version below:</p> <p>Figure 13 Capacity, Forecast and Surplus for Household and Commercial & Industrial Waste</p> <table border="1"> <caption>Figure 13 Capacity, Forecast and Surplus for Household and Commercial & Industrial Waste</caption> <thead> <tr> <th>Category</th> <th>Value (tonnes per annum)</th> </tr> </thead> <tbody> <tr> <td>South London Capacity (2021)</td> <td>945,910</td> </tr> <tr> <td>South London Forecast (2037)</td> <td>932,800</td> </tr> <tr> <td>South London Surplus</td> <td>13,110</td> </tr> </tbody> </table>				Category	Value (tonnes per annum)	South London Capacity (2021)	945,910	South London Forecast (2037)	932,800	South London Surplus	13,110
Category	Value (tonnes per annum)													
South London Capacity (2021)	945,910													
South London Forecast (2037)	932,800													
South London Surplus	13,110													
MM9	23	<p>After para 5.8 New para</p> <p>New para</p>	<p><u>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.</u></p> <p><u>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</u></p>											

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
		New para	<p><u>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).</u></p> <p><u>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. 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.</u></p>
MM10	23	Policy WP1	<p>WP1 Strategic Approach to Household and Commercial and Industrial Waste</p> <p>(a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2019 2021 London Plan apportionment target of managing 932,800 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036 2037.</p> <p>(c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).</p> <p>(d) New waste sites (either for transfer or management) will not normally be permitted, unless they are for compensatory provision (see Policy WP3).</p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																		
			<ul style="list-style-type: none"> (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 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</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 South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan,</u> 																		
MM10.1	24	Figure 14	<p>Replace Figure 14 with the update version below:</p> <p>Figure 14 Construction and Demolition Waste Arisings at 2022 and 2037 (tonnes per annum)</p> <table border="1" data-bbox="943 810 2040 1153"> <thead> <tr> <th data-bbox="943 810 1346 895">Borough</th> <th data-bbox="1346 810 1682 895">2022 Arisings</th> <th data-bbox="1682 810 2040 895">2037 Arisings</th> </tr> </thead> <tbody> <tr> <td data-bbox="943 895 1346 946">Croydon</td> <td data-bbox="1346 895 1682 946">293,381</td> <td data-bbox="1682 895 2040 946">305,058</td> </tr> <tr> <td data-bbox="943 946 1346 997">Kingston</td> <td data-bbox="1346 946 1682 997">37,966</td> <td data-bbox="1682 946 2040 997">39,040</td> </tr> <tr> <td data-bbox="943 997 1346 1048">Merton</td> <td data-bbox="1346 997 1682 1048">48,391</td> <td data-bbox="1682 997 2040 1048">54,314</td> </tr> <tr> <td data-bbox="943 1048 1346 1099">Sutton</td> <td data-bbox="1346 1048 1682 1099">15,707</td> <td data-bbox="1682 1048 2040 1099">16,607</td> </tr> <tr> <td data-bbox="943 1099 1346 1153">Total</td> <td data-bbox="1346 1099 1682 1153">395,445</td> <td data-bbox="1682 1099 2040 1153">415,019</td> </tr> </tbody> </table>	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
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																			
MM11	24	Figure 15	Replace Figure 15 with the update version below:																		

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification								
			<p data-bbox="952 204 1839 228">Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste</p>  <table border="1" data-bbox="976 268 2063 678"> <thead> <tr> <th>Category</th> <th>Value (tonnes per annum)</th> </tr> </thead> <tbody> <tr> <td>South London Capacity (2021)</td> <td>568,162</td> </tr> <tr> <td>South London Forecast (2037)</td> <td>415,019</td> </tr> <tr> <td>South London Surplus</td> <td>153,173</td> </tr> </tbody> </table>	Category	Value (tonnes per annum)	South London Capacity (2021)	568,162	South London Forecast (2037)	415,019	South London Surplus	153,173
Category	Value (tonnes per annum)										
South London Capacity (2021)	568,162										
South London Forecast (2037)	415,019										
South London Surplus	153,173										
MM12	26	Para 5.17	<p data-bbox="965 799 1256 823">Add after last sentence:</p> <p data-bbox="965 866 2011 954"><u>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 (d).</u></p>								
MM13	26	Para 5.18	<p data-bbox="965 971 1256 995">Add after last sentence:</p> <p data-bbox="965 1035 2056 1283">The Waste Data Interrogator identified that only 383 tonnes of agricultural waste was generated in the South London Waste Plan boroughs in 2017. Given the relatively small tonnage of this waste, the fact that it can be mixed with Commercial and Industrial Waste and Construction and Demolition Waste and that it is often dealt with by Commercial and Industrial and Construction and Demolition waste facilities, there is no need for the South London Waste Plan boroughs to provide for this waste stream, <u>unless exceptional circumstances would justify this type of development, as set out in Policy WP2 (e d)</u></p>								
MM14	26	Para 5.19	<p data-bbox="965 1329 1256 1353">Add after last sentence:</p>								

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification																		
			<u>As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify them, as set out in Policy WP2 (e-d).</u>																		
MM14.1	27	Figure 16	<p>Replace Figure 16 with the update version below:</p> <p>Figure 16 Hazardous Waste Arisings at 2022 and 2037 (tonnes per annum)</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>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>	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
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																			
MM15	28	Para 5.21 New para	<p>After para 5.21, insert:</p> <p><u>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.</u></p>																		
MM16	28	Policy WP2	<p>WP2 Strategic Approach to Other Forms of Waste</p> <p>(a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the forecast arisings for Construction and Demolition waste of managing 415,019 tonnes per annum within their boundaries across the plan period to 2036 2037. The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).</p>																		

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>(c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5.</p> <p>(d) New sites (either transfer or management) will not normally be supported for Construction and Demolition Waste, Radioactive Waste, Agricultural Waste and Hazardous Waste, unless:</p> <ul style="list-style-type: none"> (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 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</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 South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough's Development Plan,</u> <p>(e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.</p>
MM17	29	Para 5.24	<p>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. <u>This includes intensification or redevelopment to provide compensatory provision.</u></p>
MM18	29	Para 5.24	<p>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.</p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM19	29	<p>Para 5.25 2nd sentence</p> <p>New para</p> <p>New para</p>	<p>The 2019 ItP 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). <u>The Environment Agency’s Waste Data Interrogator should be used when assessing the maximum throughput achieved over the last five years.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p>The evidence base supporting the economic policies in the 2019 ItP 2021 London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses. Due to this the evidence also indicates that Croydon, Kingston and Merton should not release industrial land and that Sutton should provide more industrial capacity. As the South London Waste Plan area is already providing 13% more waste management capacity than waste arising in the South London Waste Plan area, the South London Waste Plan Boroughs have to carefully consider the balance of demand for further waste uses with the demand for other business and industrial enterprises to ensure a diverse and robust business base. <u>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.</u></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM20	30	Policy WP3	<p>WP3 Existing Waste Sites</p> <p>Safeguarding (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.</p> <p>Intensification (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.</p> <p>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 <u>at least meeting the equivalent of maximum achievable throughput of the site being lost.</u> The list of safeguarded sites will be updated with any compensatory sites in the Sutton Waste Waste Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.</p> <p>(d) Compensatory provision for the loss of a waste site from outside the South London Waste Plan area will not normally be permitted, <u>unless there is robust evidence that:</u></p> <ul style="list-style-type: none"> (i) <u>the compensatory provision is required for London to manage its waste sustainably and achieve net self-sufficiency; and</u> (ii) <u>there are no available or suitable sites within the borough or waste planning area where the waste site will be lost; and</u> (iii) <u>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</u> (iv) <u>it would manage waste as high up the waste hierarchy as practicable; and</u> (v) <u>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.</u> <p>(e) <u>Applications for non-waste uses on safeguarded waste sites that accord</u></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p><u>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.</u></p> <p>Safeguarding Waste Hierarchy (f) Any development on an existing safeguarded waste site, <u>including for compensatory provision,</u> will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.</p>
MM21	31	Para 5.28	<p>As set out in Policy WP, the The South London Waste Plan expects no new sites for waste use except where they are required for compensatory provision (<u>or new sites meeting the exceptional circumstances, set out in WP1 and WP2</u>). The location of compensatory sites must be carefully considered.</p>
MM22	31	Policy WP4	<p>Proposals for new waste sites <u>or development of existing safeguarded sites</u> to provide compensatory provision should:</p> <p>(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></p> <p>(b) Be Located on sites:</p> <p>(i) <u>Safeguarded for waste, including waste transfer stations, or</u> within Strategic Industrial Locations or Locally Significant Industrial Locations;</p>
MM23	31	Policy WP4	<p>d (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land); <u>(v) not within the Green Belt or Metropolitan Open Land</u></p>
MM24	31	Policy WP4	<p><u>(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost.</u></p> <p>(f) <u>(h)</u> Meet the other policies of the relevant borough's Development Plan.</p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM25	31	Policy WP4	<p><u>Consolidated changes to Policy WP4 (as set out above) for ease of reference:</u></p> <p>Policy WP4: Sites for Compensatory Provision</p> <p>Proposals for new waste sites <u>or development of existing safeguarded sites</u> to provide compensatory provision should:</p> <p>(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></p> <p>(b) Be located on sites:</p> <p>(i) <u>safeguarded for waste, including waste transfer stations, or</u> within Strategic Industrial Locations or Locally Significant Industrial Locations;</p> <p>(ii) not having an adverse effect on nature conservation areas protected by international or national regulations;</p> <p>(iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,</p> <p>(iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.</p> <p>(v) <u>not within the Green Belt or Metropolitan Open Land</u></p> <p>(c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;</p> <p>(d) Have particular regard to sites which:</p> <p>(i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land);</p> <p>(ii) are located more than 100 metres from open space;</p> <p>(iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);</p> <p>(iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;</p> <p>(v) have direct access to the strategic road network;</p> <p>(vi) have no Public Rights of Way crossing the site;</p> <p>(vii) do not adversely affect regional and local nature conservation areas,</p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>conservation areas and locally designated areas of special character, archaeological sites and strategic views;</p> <p>(viii) offer opportunities to accommodate various related facilities on a single site;</p> <p>(e) Include appropriate mitigation measures which will be considered in assessing site suitability;</p> <p><u>(f) result in waste being managed at least to the same level in the waste hierarchy as the site being lost.</u></p> <p>(f) <u>(g)</u> Meet the other policies of the relevant borough's Development Plan.</p>
MM26	33	Policy WP5	<p>(a) Developments for compensatory or intensified waste facilities should <u>contribute positively to the character and quality of the area and</u> ensure that any <u>potential adverse</u> impacts of the development are designed and managed to mitigate any achieve levels that will not significantly adversely affect <u>are appropriately mitigated.</u></p>
MM27	33	Policy WP5	<p>(c) (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals, and residential areas. <u>Heritage Assets and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</u></p> <p><u>(iv) sensitive receptors, such as schools, hospitals and residential areas;</u></p> <p>[Renumber other clauses accordingly]</p>
MM28	33	Policy WP5	<p>(c) (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</p> <p><u>(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</u></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<u>minimise increased exposure of people and in particular vulnerable individuals to poor air quality.</u>
MM29	33	Policy WP5	(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; <u>(viii) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials</u> (viii) <u>(vix) The safety and security of the site</u>
MM30	33	Policy WP5	Amend final sentence of Policy WP5: The information in the schedule below will provide the basis for the assessment of the impact of a development <u>and should therefore be considered as part of any pre-application engagement.</u>
MM31	33	Policy WP5	<u>Consolidated changes to Policy WP5 (as set out above) for ease of reference:</u> WP5 Protecting and Enhancing Amenity (a) Developments for compensatory or intensified waste facilities should <u>contribute positively to the character and quality of the area and</u> ensure that any <u>potential adverse</u> impacts of the development are designed and managed to mitigate any achieve levels that will not significantly adversely affect <u>are appropriately mitigated.</u> (b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building. (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar; (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected; (iii) Archaeological sites, the historic environment and sensitive receptors,

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>such as schools, hospitals and residential areas;</p> <p><u>(iii) Heritage Assets that and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</u></p> <p><u>(iv) sensitive receptors, such as schools, hospitals and residential areas;</u></p> <p><u>(v) Groundwater, surface water and watercourses;</u></p> <p>(v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</p> <p><u>(vi) 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 particularly vulnerable to poor air quality, such as children, people in poor health or the elderly".</u></p> <p><u>(vii) Noise and vibration from the plant and traffic generated;</u></p> <p><u>(viii) 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;</u></p> <p><u>(ix) opportunities to minimise 'waste miles' and the potential of using sustainable modes of transport for incoming and outgoing materials</u></p> <p><u>(x) The safety and security of the site</u></p> <p><u>(xi) Odour, litter, vermin and birds; and,</u></p> <p><u>(xii) The design of the waste facility, particularly:</u></p> <ul style="list-style-type: none"> • complementing or improving the character of an area; • limiting the visual impact of the development by employing hard and soft landscaping and minimising glare; • being of a scale, massing or height appropriate to the townscape or landscape; • using good quality materials; • minimising the requirement for exterior lighting; and,

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<ul style="list-style-type: none"> utilising high-quality boundary treatments. <p>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.</p>
MM32	34	Policy WP5 Schedule	<p>Schedule: Information which may be required for a planning application</p> <p>22. Air Quality Impact Assessment, demonstrating <u>setting out</u> 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 movements to and from it.</u> <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:</u></p> <ul style="list-style-type: none"> <u>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;</u> <u>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 levels of exposure to poor air quality;</u> <u>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 air pollution impacts from approved and proposed development, as advised by the council's Air Quality Officer.</u> <u>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</u> <u>incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM33	34	Policy WP5 Schedule	<p>Schedule: Information which may be required for a planning application:</p> <p>30 Measures for protecting Public Rights of Way</p> <p>31 Transport Assessment, which may address measures such as highway safety measures, protecting Public Rights of Way and an access strategy</p> <p>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.</p> <p>32 Route Management Strategy</p> <p>33 Access Strategy</p> <p>34 Delivery Servicing Plan/Freight Plan</p> <p>35 Construction Logistics Plan</p> <p>36 Highway safety measures</p>
MM34	36	Para 5.36	<p>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 S12 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. <u>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 SI2 through application of the Mayor's energy hierarchy (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</u></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p><u>shortfall in emissions reductions must then be addressed through a financial contribution to the relevant borough's carbon offset fund.</u></p>
MM35	36	Para 5.38 Insert new paragraph after 5.38 (and renumber subsequent paragraph accordingly)	<p><u>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.</u></p>
MM36	36	Para 5.39	<p>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. <u>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:</u></p> <ul style="list-style-type: none"> • <u>Heating, Cooling and Energy Use</u> <u>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).</u> Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and minimising of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly; • <u>Flood Readiness.</u> 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. <u>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;</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<ul style="list-style-type: none"> Odours. <u>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.</u>
MM37	36	Para 5.39	<p>Paragraph 5.41 (now 5.42):</p> <p>5.41 5.42 Therefore in accordance with national and regional advice, the 2019 21 21 LSP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:</p>
MM38	37	Para 5.40	<p>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></p>
MM39	37	Policy WP6	<p>(b) Waste facilities will be required to:</p> <p>(v) minimise waste and promote sustainable management of construction waste on site <u>the beneficial use of excavation waste on site and the reuse, recycling or recover of construction and demolition waste on site;</u> and</p>
MM40	38	Para 5.44 Last sentence	<p>Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted. <u>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.</u></p>
MM41	38	Policy WP7	<p>WP7 The Benefits of Waste</p> <p>(a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.</p>


MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>(b) Waste development for additional Energy from Waste facilities will not <u>that can deliver additional benefits, as set out in London Plan Policy SI 8 Part D, Points 3 and 4, will</u> be supported <u>encouraged.</u></p> <p>(c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.</p>
MM42	39	Policy WP8	<p>WP8 New Development Affecting Waste Sites</p> <p>(a) 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.</p> <p>(b) 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:</p> <p>(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</p> <p>(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</p> <p>(iii) <u>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.</u></p>
MM43	40	Para 5.52	<p>Amend examples of where a planning obligation may be considered as follows:</p> <ul style="list-style-type: none"> • <u>Transport Management Strategies, that include Delivery and Servicing Plans that incorporate measures to; manage traffic routes to the site</u> Traffic management measures, including the routing of vehicles; supporting staff

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
			<p>to travel sustainably; ensure improving road safety; reducing reduce freight traffic, particularly at peak times, <u>facilitate a transition to low emission vehicles and a monitoring regime.</u></p> <ul style="list-style-type: none"> • off-site <u>post implementation</u> monitoring of emissions <u>and reporting of impacts upon</u> the water environment, <u>particularly for new or intensified waste sites adjacent to main rivers or other watercourses</u> • <u>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;</u>
MM44	40	Policy WP9	<p>Policy WP9 Planning Obligations:</p> <p>Planning obligations will be used to ensure that all new Waste development or waste redevelopment <u>must ensure that where these have off-site impacts, these are addressed to make the development acceptable</u> 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.</p>
MM45	41	Para 5.54	<p>The South London Waste Plan boroughs recognise that on-going plan monitoring and review are essential to:</p> <ul style="list-style-type: none"> • delivering the objectives of the plan • assessing the implementation of the strategic policies • analysing the effectiveness of policies • <u>analysing waste planning permissions and compliance with planning conditions and obligations</u>
MM46	41	New para after 5.57	<p><u>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.</u></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM47	41	<p>New Paragraphs after 5.58</p> <p>New para</p> <p>New para</p> <p>New para</p> <p>New para</p> <p>New para</p> <p>New para</p>	<p><u>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.</u></p> <p><u>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.</u></p> <p><u>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).</u></p> <p><u>The Environmental Permitting Regulations are the basis for any enforcement action and the principal offences are:</u></p> <ul style="list-style-type: none"> • <u>operating a regulated facility without a permit;</u> • <u>causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and</u> • <u>failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.</u> <p><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.</u></p> <p><u>The South London Waste Plan 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</u></p>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
		New para	<p><u>part of the Waste Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.</u></p> <p><u>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 be 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.</u></p>
MM48	41	Policy WP10	<p>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 <u>on the outcome of plan</u> the monitoring and the boroughs, in consultation with each other <u>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.</u> will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.</p>
MM49	43	How to read the information on Safeguarded Sites	<p>Under "Maximum throughput (in tonnes per annum)":</p> <p>The maximum throughput achieved by the site in any one year between 2013 and 2017 <u>in the last five year period, using the latest available information from the Environment Agency Waste Data Interrogator.</u> The 2019-ItP <u>2021</u> London Plan recommends that boroughs should use this measure to assess capacity</p>
MM50	44 to 91	Sites Figures	<p>Updated figures in accordance with the Figures set out in the updated Appendix 2 in Annex 1 to this schedule (and as set out in SLWP07)</p>
MM51	45	Site C4 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties</u> in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM52	46	Site C5a	Delete:

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
		Opportunity to increase waste managed	"There are no plans by the South London Waste Partnership to intensify operations at this site."
MM53	46	Site C5a Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM54	47	Site C5b Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM55	48	Site C6 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM56	48	Site C6 Issues to consider	<ul style="list-style-type: none"> Designing a facility that does not impact on the openness of Metropolitan Green Belt <u>takes into consideration the wider visual or landscape effects to the adjoining countryside.</u>
MM57	49	Site C7 Issues to Consider	Add the Tier number to the archaeological consideration: <u>"Evaluating and preserving any archaeological remains (Tier 4)"</u>
MM58	50	Site C8 Issues to consider	Conserving, and where possible enhancing, <u>Ensuring the preservation or enhancement of</u> the setting and significance of Airport House, a Grade II* Listed building opposite
MM59	51	Site C9 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM60	51	Site C9 Issues to consider	Developers planning to intensify <u>develop</u> 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>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM61	51	Site C9 Map	<p>Replace existing site boundary with the site boundary in red on the map below:</p> 
MM62	51	Site C10 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM63	52	Site C10 Issues to consider	<ul style="list-style-type: none"> 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.
MM64	53	Site C11	<p>Delete this site and all reference to it in the Plan</p>
MM65	54	Site C12 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM66	55	Site C13 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>
MM67	57	Site K2 Issues to consider	Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>
MM68	58	Site K3 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>
MM69	59	Site K4 Issues to consider	Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>
MM70	59	Site K4 Opportunity to increase waste managed	Delete: "No. There are no plans by the South London Waste Partnership to intensify operations at this site." Replace with " <u>Yes</u> "
MM71	55	After Site K4 Add new site safeguarding sheet:	<u>K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD</u> See Annex 1 to this Schedule for the full site sheet.
MM72	61	Site M1 Issues to consider Add bullet:	<ul style="list-style-type: none"> <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>
MM73	63	Site M3 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>
MM74	64	Site M4 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>
MM75	65	Site M5 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM76	66	Site M6 Issues to consider Amend 9 th bullet point	<ul style="list-style-type: none"> Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>
MM77	66	Site M6 Issues to consider	<p>Insert the following as an additional bullet point under "Issues to consider if there is a further application":</p> <ul style="list-style-type: none"> <u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u>
MM78	67	Site M7 Issues to consider Add bullet point	<ul style="list-style-type: none"> <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>
MM79	68	Site M8 Issues to consider	<p>Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts.</u></p>
MM80	69	Site M9 Opportunity to increase waste managed	<p>Delete:</p> <p>"No. The plot throughput ration is above the average for this type of facility so there are unlikely to be opportunities to intensify the throughput"</p> <p>Add:</p> <p><u>"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"</u></p>
MM81	69	Site M9 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Contributing positively to the living conditions</u> of those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts
MM82	70	Site M10 Issues to consider Amend 7 th bullet point	<ul style="list-style-type: none"> Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM83	70	Site M10 Issues to consider Add bullet point	<ul style="list-style-type: none"> • <u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u>
MM84	71	Site M11 Issues to consider	<ul style="list-style-type: none"> • Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties</u> in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM85	71	Site M11 Issues to consider Amend 7 th bullet point	<ul style="list-style-type: none"> • Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>
MM86	72	Site M12 Issues to Consider	<ul style="list-style-type: none"> • Protecting the residential amenity of those properties <u>(both bricks and mortar and Gypsy and Traveller accommodation)</u> in the vicinity of the site, especially with regard to air emissions and noise impacts
MM87	72	Site M12 Issues to consider Amend 6 th bullet point	<ul style="list-style-type: none"> • Protecting the amenity of those using the future Wandle Valley Regional Park <u>and those using it</u>
MM88	72	Site M12 Issues to consider Amend 10 th bullet point	<ul style="list-style-type: none"> • Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>
MM89	73	Site M13 Issues to consider Add bullet	<ul style="list-style-type: none"> • <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>
MM90	72	Site M14 Issues to consider	<ul style="list-style-type: none"> • Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties</u> in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM91	72	Site M14 Issues to consider Amend 8 th bullet point	<ul style="list-style-type: none"> • Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>
MM92	74	Site M14	

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
		Issues to consider Add bullet	<ul style="list-style-type: none"> • <u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u>
MM93	75	Site M15 Issues to consider	<p>Delete "Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</p> <p><u>Replace with: Conserving, and where possible enhancing, significance of the adjacent Wandle Valley Conservation Area</u></p>
MM94	75	Site M15 Issues to consider Amend 8 th bullet point	<ul style="list-style-type: none"> • Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>
MM95	75	Site M15 Issues to consider	<p>Insert the following as an additional bullet point under "Issues to consider if there is a further application":</p> <ul style="list-style-type: none"> • <u>Protecting the amenity of the Wandle Valley Regional Park and those using it</u>
MM96	75	Site M15 Issues to consider Add bullet	<ul style="list-style-type: none"> • <u>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</u>
MM97	76	Site M16 Issues to consider	<p>Delete "Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</p> <p><u>Replace with: Conserving, and where possible enhancing, the significance of the Wandle Valley Conservation Area</u></p>
MM98	76	Site M16 Issues to consider Add bullet	<ul style="list-style-type: none"> • <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>
MM99	76	Site M16 Issues to consider Amend 8 th bullet point	<ul style="list-style-type: none"> • Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM100	76	Site M16 Issues to consider Amend final bullet point	<ul style="list-style-type: none"> Protecting the amenity of those using the future Wandle Valley Regional Park <u>and those using it</u>
MM101	77	Site M17 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM102	78	Site M18 Issues to consider Add bullet	<ul style="list-style-type: none"> <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>
MM103	80	Site S1 777 Recycling Centre	Delete Site <u>S1 '777 Recycling Centre'</u> and any other references to it in the Plan
MM104	81	Site S2 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM105	81	Site S2 Issues to consider Add bullet	<ul style="list-style-type: none"> <u>Undertaking an air quality assessments and transport assessments in accordance with the requirements of Policy WP5</u>
MM106	81	Site S2 Amend 5 th bullet point	<ul style="list-style-type: none"> Protecting the amenity of those using the future Wandle Valley Regional Park <u>and those using it</u>
MM107	81	Site S3 Amend 5 th bullet point	<ul style="list-style-type: none"> Protecting the amenity of those using the future Wandle Valley Regional Park <u>and those using it</u>
MM108	81	Site S3 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of</u> those <u>residential</u> properties in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM109	82	Site S3 Amend 8 th bullet point	<ul style="list-style-type: none"> Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land.</u>
MM110	83	Site S4 Issues to consider Add bullet	<ul style="list-style-type: none"> <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification
MM111	86	Site S7 Issues to consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties</u> in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM112	86	Site S7 Amend 6 th bullet point	<ul style="list-style-type: none"> Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land.</u>
MM113	88	Site S9 Issues to consider Add bullet	<ul style="list-style-type: none"> <u>Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts</u>
MM114	89	Site S10 Issues to Consider	<ul style="list-style-type: none"> Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads <u>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</u>
MM115	89	Site S10 Issues to Consider New bullet:	<ul style="list-style-type: none"> <u>Evaluating and preserving any archaeological remains</u>
MM116	90	Site S11 TGM	Delete Site S11 TGM Environment from the schedule of safeguarded sites, Appendix 2 and any other references to the site in the Plan.
MM117	91	Site S12 Issues to Consider	<ul style="list-style-type: none"> Protecting the residential amenity <u>Avoiding harm to the living conditions of the occupants of those residential properties</u> in the vicinity of the site, especially with regard to air emissions and noise impacts.
MM118	91	Site S12 Issues to Consider Amend 5 th bullet point	<ul style="list-style-type: none"> Protecting the amenity of those using the future Wandle Valley Regional Park <u>and those using it</u>
MM119	91	Site S12	Amend 9 th bullet point:

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification						
			<ul style="list-style-type: none"> Designing a facility that does not impact on the openness of <u>takes into consideration the wider visual or landscape effect of the adjoining Metropolitan Open Land.</u> 						
MM120	93	Appendix 1 Monitoring Table	Modify the Monitoring and Contingencies Table in accordance with Annex 2.						
MM121	99	Appendix 2	Update Appendix 2 in accordance with Annex 3 to this Schedule of Main Modifications						
MM122	102	Appendix 3 Ref 21 '777 Recycling'	Safeguarding carried forward as Site S1 <u>The throughput of the site has significantly declined and the operator is planning to cease operations due to viability. Capacity from site no longer required to meet the waste apportionment.</u>						
MM123	104	Appendix 4 Glossary	<p>Additions to the Glossary:</p> <p><u>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:</u></p> <ul style="list-style-type: none"> <u>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</u> <u>the boundary of the site is extended to allow for either of the above.</u> <p><u>Existing Waste Site: A waste site that is materially in operation as a waste site</u></p> <p><u>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.</u></p>						
MM124	106	New Appendix 5	<p>Add: <u>Appendix 5 South London Waste Plan 2012 Superseded Policies</u></p> <table border="1"> <thead> <tr> <th>Adopted SLWP (2012) Policies to be Superseded</th> <th>Replacement Policies in the Draft SLWP</th> </tr> </thead> <tbody> <tr> <td colspan="2">Strategic Policies</td> </tr> <tr> <td>WP1: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste</td> <td>WP1: Strategic Approach to Household and Commercial and Industrial Waste</td> </tr> </tbody> </table>	Adopted SLWP (2012) Policies to be Superseded	Replacement Policies in the Draft SLWP	Strategic Policies		WP1: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste	WP1: Strategic Approach to Household and Commercial and Industrial Waste
Adopted SLWP (2012) Policies to be Superseded	Replacement Policies in the Draft SLWP								
Strategic Policies									
WP1: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste	WP1: Strategic Approach to Household and Commercial and Industrial Waste								

MM Ref.	Page	Plan Ref: Policy / Paragraph / Figure	Main Modification	
			WP2: Strategic Approach to Other Forms of Waste	WP2: Strategic Approach to Other Forms of Waste
			Non-Strategic Policies	
			WP3: Existing Waste Sites	WP3: Existing Waste Sites
			WP4: Industrial Areas with Sites Suitable for Waste Facilities	The draft Plan proposes no new sites, unless for compensatory provision. As such the adopted Policy WP4 would be deleted on adoption of the draft Plan
			WP5: Windfall Sites and Non MSW and C&I Waste Location Criteria	WP4: Sites for Compensatory Provision.
			WP6: Sustainable Design and Construction of Waste Facilities	WP6: Sustainable Construction and Design of Waste Facilities
			WP7: Protecting and Enhancing Amenity	WP5: Protecting and Enhancing Amenity
			WP8: Sustainable Energy Recovery	WP7: The Benefits of Waste The draft Plan does not support additional Energy from Waste facilities, as set out in draft Policy WP7.
			WP9: Planning Obligations	WP9: Planning Obligations WP10: Monitoring and Contingencies

Annex 1: New Safeguarded Site Sheet for 'K5 Chessington Railhead'

Annex 2: Modified Appendix 1 - Monitoring and Contingency Table

Annex 3: Modified Appendix 2 - Sites counting towards the Apportionment and C&D Target