

GREATER LONDON AUTHORITY

Ms Carmel Edwards

c/o Strategic Planning Department
London Borough of Sutton
24 Denmark Road,
Carshalton
SM5 2JG

Department: Planning

Your reference:
Our reference: LDF36/SLWP02/LP03/HA01
Date: 15 July 2021

By email: programmeofficer@carmeledwards.com

Dear Ms Edwards

Re: South London Waste Plan Examination. Inspector's Matters, issues and questions

- **Matter 2 – Is the Plan in general conformity with the London Plan?**

Thank you for inviting Matters Statements in advance of the South London Waste Plan (SLWP) Examination Hearing sessions. The South London boroughs have been actively engaging with officers at the Greater London Authority (GLA), and there have been meetings to discuss the concerns raised in the Mayor's letter of conformity dated 22 October 2020 (Ref: LDF36/SLWP02/HA02).

Firstly, it would be useful to clarify the relationship between the London Plan and Local Plans in London. The Planning and Compulsory Purchase Act 2004 (as amended) is clear in S.24 that development plan documents prepared by London boroughs must be in general conformity with the spatial development strategy (SDS) for London (referred to as the London Plan). When the South London Waste boroughs requested the Mayor's opinion on the general conformity of the Waste Plan on 8 March 2021, the London Plan 2021 (LP2021) had been formally published on 2 March 2021 and now forms part of the Development Plans of all the South London Waste Plan boroughs and contains the most up-to-date policies.

The London Plan seeks to manage the equivalent of 100 per cent of London's waste within London (i.e. net self-sufficiency) by 2026. The Mayor's powers to influence where waste is managed are limited, not being a waste planning authority. However, the London Plan provides the framework to help deliver on the Mayor's ambitions for waste policy.

For example, the Mayor influences waste management by requiring boroughs to safeguard sufficient waste sites to achieve net self-sufficiency and set performance criteria for waste facilities to maximise recycling. In addition, through the London Waste and Recycling Board (LWaRB), the Mayor can influence waste management by helping to fund new facilities in London, supporting borough recycling initiatives and sharing best practice. Waste Authorities (boroughs and statutory waste disposal authorities) also need to be in general conformity with the waste elements of the Mayor's Environment Strategy when undertaking their functions. This is ensured through the waste contracts (for Local Authority Collected Waste) and strategies and the Mayor has the power to direct a waste authority if required.

Mayor of London Statement

GLA officers have carefully considered proposed pre-hearing modifications to the SLWP ([SWLP02a – Schedule of Main Modifications](#); and [SLWP03A – Schedule of Additional Modifications](#)) and can confirm that the proposed modifications do not address the non-conformity issues raised by the Mayor in his response to the South London Waste Plan Regulation 19 consultation (Ref: LDF36/SLWP02/HA02) dated 22 October 2020. As such the Mayor maintains his position that the SLWP is not in general conformity with the London Plan 2021 (LP2021) at this moment in time, for two reasons. Firstly, it fails to secure compensatory capacity of at least equivalent throughput to that which would be lost as a result of draft Policy WP3(c) and secondly, for a failure to appropriately implement the waste hierarchy in accordance with Policy SI9 C of the LP2021.

While the current draft of the Waste Plan is not considered to be in general conformity with the LP2021, there has been very positive recent engagement and collaboration between the South London Waste boroughs and GLA officers in order to address these outstanding matters of general conformity and the Mayor is confident that these issues can be resolved through further proposed modifications agreed through a Statement of Common Ground prior to the examination hearings to be held in September. This should ultimately result in the withdrawal of the Mayor's objections and bring the resulting Waste Plan into general conformity with the LP2021.

I hope this statement can help inform the examination of the South London Waste Plan. If you have any questions in relation to this statement, please contact Hassan Ahmed on 020 7084 2751, or by email at Hassan.ahmed@london.gov.uk.

Yours sincerely



Lucinda Turner

Assistant Director of Planning

Cc: Neil Garratt, Nicholas Rogers and Leonie Cooper, London Assembly Constituency Members
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG