



HOUSE OF COMMONS

LONDON SW1A 0AA

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

16 July 2021

Ref: EC9319

**The Draft South London Waste Plan 2021-2036 – Examination statement by Elliot Colburn,  
Member of Parliament for Carshalton and Wallington**

The Planning Inspectorate has invited statements as part of the examination of the Draft South London Waste Plan 2021-2036, produced by the London Borough of Croydon, Royal Borough of Kingston, London Borough of Merton and London Borough of Sutton.

As the Member of Parliament for Carshalton & Wallington in the London Borough of Sutton, I wish to submit the following representation to be considered as part of the Examination Stage.

Having reviewed the draft plan and supporting evidence, I want to raise a few concerns that bring into question the soundness of the plan, with relation to the main Matters identified by the Inspector:

- The failure to promote waste reduction and potential overestimation of capacity in the four boroughs;
- Lack of community engagement and compensation;
- Increased cumulative impacts of intensifying Beddington waste facilities, and;
- Energy recovery facility and compliance with carbon and climate change tactics.

Therefore, I believe that the plan fails the following tests of soundness:

- **Positively prepared:** this plan has neither demonstrated that it is meeting objectively assessed need nor is consistent with achieving sustainable development;
- **Justified:** the plan does not adopt the most appropriate strategy to plan for waste management after consideration of the alternatives;
- **Effective:** the plan does not demonstrate how its strategies are deliverable or consistent with waste reduction targets, nor is it;
- **Consistent with national policy:** the plan contravenes the policies within the National Planning Policy Framework (NPPF), National Planning Policy for Waste (NPPW), Planning Practice Guidance (PPG), the 2021 London Plan (LP) and Sutton Council's Local Plan (SCLP).

I have set out below how each of my concerns answer the Matters, Issues and Questions

Serving the people of Carshalton and Wallington

identified by the Inspector.

### **The failure to promote waste reduction and potential overestimation of capacity in the four boroughs**

One of the key visions of the South London Waste Plan (SLWP) is to create a waste management process that is self-sufficient within the four boroughs of Croydon, Kingston, Merton and Sutton. Whilst this vision is certainly admirable and largely supported in principle, there remain questions over the capacity for the four boroughs to deliver on that.

The SLWP's predictive modelling suggests that the four boroughs will be operating with excess capacity to manage their waste by the end of the plan term. The plan goes further and suggests that the four boroughs will be capable of and committed to managing more waste than they generate: *"In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generated."*<sup>[1]</sup> This roughly calculates as an extra 104,750 tpa to manage on top of the waste generated by the four boroughs themselves.

In 2017, the four boroughs exported 300,000 tpa waste. 108,000 tpa of this total will, in future, be managed by Beddington.<sup>[2]</sup> It is unclear from the plan documents whether the remaining 192,000 tpa waste, which was exported in 2017, will continue to be exported or managed within the four boroughs. Regardless, the inclusion of the exported 192,000 tpa waste is more than enough to fill the extra capacity gap of the four boroughs.

The SLWP makes it clear that the four boroughs are currently net importers of waste with 620,000 tpa imported in 2017. As above, it is unclear whether the sources of the 620,000 tpa imports will continue to be managed by the four boroughs going forward or whether the four boroughs will import more waste to make-up capacity if they reduce their waste output during the plan period.

Further, there are concerns about the forecast and estimates for the waste arisings and apportionments due to the baseline datasets. 2017 tpa waste figures are used by the GLA as the baseline for the predictive modelling. Yet, Policy 2 of the National Planning Policy for Waste (2014) makes it clear that waste authorities should *"ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. Spurious precision should be avoided."*

**Matter 3, Issue 4, Question 4** of the Inspector's Matters, Issues and Questions identifies this as a primary concern with the draft plan, with reference to potential contraventions with paragraph 2 of the NPPW. The entire SLWP (2019) strategy is based on waste data that is four years out of date, and likely to be even more by the time it is due to be adopted.

It is also likely that households waste generation has and will continue to grow over the coming weeks, months and years if people continue to work from home, rather than commuting into working, due to COVID-19 (as has been monitored in other waste

authorities).<sup>[3]</sup> Concerningly, the impact of COVID-19 is not referenced at all within the plan or accompanying documents, which is a key concern identified in **Matter 3, Issue 2, Question 3** of the Inspector's Matters, Issues and Questions.

The best available data has not been used as the evidence base for this plan, in contravention of Policy 2 of the NPPW. Therefore, the strategy of **the plan has not been positively prepared**, bringing into question the soundness of the document.

The SLWP's predictive arisings and apportionments for the four boroughs are not just modelled from past waste data, but also take into account a reduced 5% waste target for the four boroughs. Whilst a strategy to reduce waste is, of course, welcomed in principle, there needs to be a plan in place to ensure that that target is achievable.

Policy SI8b of the London Plan (2021), states that development documents must "*identify how waste will be reduced.*" And, the London Environment Strategy states that plans should demonstrate how they "*help move waste up the waste hierarchy to ensure a greater focus on reduction, reuse and recycling.*"<sup>[4]</sup> Despite this, the SLWP does not contain sufficient information to demonstrate how it will reach the 5% waste reduction target and help move waste up the hierarchy, and is therefore not in conformity with the London Plan, as per **Matter 2** of the Inspector's Matters, Issues and Questions.

Sutton Council already has a recent (and ongoing) history of failing to discharge their responsibilities with regards to household waste collection (one of the most common complaints I receive in my inbox is from residents who have not had their waste collected). **Matter 5** of the Inspector's Matters, Issues and Questions identifies concerns about the effective implementation and monitoring of the plan's method. To ensure the entire SLWP's strategy is achievable, greater work is needed to plan with the waste authorities the realistic roadmap to achieving this. Therefore, the plan is **not effective** and fails to pass the soundness criteria.

These concerns may seem minor on paper but in reality they could have huge implications. Without reliable evidence bases and predictive modelling, there is a very real concern that the capacity for waste management is overestimated for the four boroughs. In the years to come, this could result in unacceptable cumulative impacts from a local waste process that is working overcapacity.

### **Lack of community engagement and compensation**

The plan proposes a significant intensification of the Beddington waste management sites. **Matter 4, Issue 4, Question 1** of the Inspector's Matters, Issues and Questions identified the significance of public engagement established in Planning Practice Guidance. The Inspector queries whether the plan is sufficiently clear in terms of how and when local communities would be engaged in proposals relating to the development of compensatory provision or the intensification of existing sites.

*“It is important to consider the cumulative effect of previous waste disposal facilities on a community’s wellbeing. Impacts on environmental quality, social cohesion and inclusion and economic potential may all be relevant. Engagement with the local communities affected by previous waste disposal decisions will help in these considerations.”*<sup>[5]</sup>

Despite this, the plan provides no detail of engagement undertaken to assess the impact of current waste management operations in Beddington. As the Member of Parliament representing Beddington, one of the most common concerns residents raise with me is the impact of waste management in the area on their homes and lives.

This isn’t just anecdotal evidence. Resident satisfaction levels for street cleaning and waste collection in Sutton have still not recovered to the position prior to the start of the Veolia contract in 2017. Satisfaction of recycling services have fallen from 77% in 2015 to 71% in 2019, and satisfaction of waste collection services have fallen from 82% in 2015 to 68% in 2019.<sup>[6]</sup>

The community impact of the intensification of Beddington has not been taken into account, nor has there been enough consideration of compensation for local residents or efforts to mitigate the impacts of the intensification. Therefore, the plan’s strategy is **not justified**.

### **Increased cumulative impacts of intensifying Beddington waste facilities**

As previously mentioned, the SLWP seemingly places great responsibility on Beddington to provide extra capacity for waste management. As well as the extra 107, 952 tpa waste from 2017 that will be managed in lieu of the Slough site, there also could be compensatory capacity heading to Beddington in lieu of the Benedict Wharf site in Merton, which has a capacity of 275,000 tpa. Despite this, page 81 on the Plan states that there is *“no opportunities to upgrade or intensify operations at the current time.”*

These two extra contributions in Beddington alone were not considered when planning permission was given to the recycling facility and the ERF in Beddington. Combined, this totals over 21,000 annual vehicle movements to and from Beddington Lane based on Veolia’s 18-tonne waste collection vehicle fleets. Whilst the Beddington Energy Recovery Facility is supposedly strictly monitored for its emissions, the related vehicle emissions to and from the site are not included in these limits (more on emissions below).

The SLWP Technical Paper states that *“there is a major traffic congestion [sic] in nearby Beddington SIL, particularly on Beddington Lane”*.<sup>[7]</sup> Likewise, the SLWP suggests that if further applications are to be considered, the plan suggests *“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.”*

The increased pressure on Beddington to support waste management across the four boroughs has not been given enough consideration. The NPPW suggests that waste plans

should consider the “*suitability of the road network*” when potentially enhancing waste management facilities and waste management facilities must “*contribute positively to the character and quality of the area in which they are located*”.[\[8\]](#)

Paragraph 102b of the National Planning Policy Framework also places great importance of considering the impact of traffic during plan making:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”*

Despite this, there doesn't appear to be any identification of the traffic impact of the SLWP or proposals to mitigate the impact. This is a clear concern identified in **Matter 3, Issue 5, Question 4; Matter 4, Issue 1, Question 6, and; Matter 4, Issue 2** of the Inspector's Matters, Issues and Questions with regards to the lack of assessment of the intensification of sites, the impact of traffic on air pollution and the overall cumulative impact on communities.

Without identifying the true impact of the traffic generated from the potential new waste streams into the four boroughs within the SLWP, the plan **does not comply with national policy** and, therefore, brings doubt over the soundness of the document.

### **Energy recovery facility and compliance with carbon targets**

Beddington is home to a new Energy Recovery Facility (ERF), which incinerates household waste to generate electricity for the grid, as well as hot water and heating for the nearby New Mill Quarter housing estate of approximately 800 properties.

Despite not being fully operational, the ERF has already become the greatest air polluter in Sutton. Furthermore, throughout recent years, there have been several incidences where emissions at the ERF have breached limits or, more often, not been reported at all (invalid report).

Because of regular breaches at the Beddington incinerator, the Environment Agency has increased the frequency of reporting from every half hour to every 10 minutes. The 10-minute maximum imposed by the Environment Agency is mg per cubic metre. On 26 January 2020, the emissions from just one of the Beddington incinerator's two chimneys were nearly five times that level, and consequently it was shut down for two days. The other chimney was even worse and exceeded emissions limits on 2, 14, 20 and 26 January 2020. On 26 January 2020 the level was 10 times over the limit. To add insult to injury, the operators were still registering at least one invalid report almost every day of the month and, as mentioned above, this does not take into account the vehicle emissions transporting the waste.

This is a critical issue when assessing waste services and carbon emissions in South London.

The emerging London Plan places strict limits on carbon emissions generated from energy recovery facilities:

*“To support the shift towards a low-carbon circular economy, all facilities generating energy from waste should meet, or demonstrate that they can meet in future, a measure of minimum greenhouse gas performance known as the carbon intensity floor (CIF). The CIF is set at 400g of CO<sub>2</sub> equivalent generated per kilowatt hour (kwh) of electricity generated.”*<sup>[9]</sup>

Without reliable and consistent emissions data from Beddington ERF, it cannot be confirmed that the facility complies with the London Plan emissions limits. This concern is echoed in the Inspector’s Matters, Issues and Questions (**Matter 3, Issue 5, Question 10**), querying whether the plan takes into account emissions and climate change targets.

Further, upon a recent visit to the ERF last year, I was concerned to find out that on numerous occasions, emission levels will spike when inappropriate materials are incinerated, rather than recycled or dealt with in another way. One such example is gas canisters. It’s concerning that such highly polluting objects are not extracted from the waste stream before incineration. Likewise, less harmful recyclable materials are also wrongly being incinerated, instead of recycled. Again, this concern is of importance to **Matter 4, Issue 2** of the Inspector’s Matters, Issues and Questions.

When I enquired with Viridor what processes are in place to prevent inappropriate domestic waste materials from being incinerated, I was informed that little was actively done to remove these materials once they entered the waste stream at collection. With the exception of staff briefly looking at the waste when collected from homes and deposited at the ERF, little is done to primarily identify and extract inappropriate materials. Whilst it’s true that prevention is always the best method of stopping materials being incinerated, starting at the home, there is still more to be done at the incineration site to tackle this issue.

Emphasis is placed on this in the London Environment Strategy:

*“Waste going to EFW plants often contains large amounts of recyclable materials that are high carbon and high value. Reducing the amount of high carbon materials particularly plastics and metals going to EFW plants will deliver GHG savings, and reduce the reliance on fossil fuels. This will drive change and investment within boroughs and with facility operators, to ensure that truly residual waste is used to generate both heat and power for the benefit of Londoners.”*<sup>[10]</sup>

The draft South London Waste plan need to pay greater attention to addressing the emissions reports and incineration of inappropriate materials at Beddington ERF. Whilst I appreciate it is difficult to alter processes at a functioning waste removal facilities, it is important to target these particular issues of concern. As has been demonstrated elsewhere in the world, mechanical and biological treatment processes can help filter out inappropriate materials from the waste stream before incineration and contribute towards reducing emissions. It is clear that this plan has **not been positively prepared** to ensure a successful

strategy is in place to meet our waste needs.

### **Conclusion**

I have highlighted four major queries in this statement which I believe contravene local and national waste and planning policy, with regards to the Inspector's Matters, Issues and Questions. These areas need further consideration before the emerging South London Waste Plan is adopted and without significant amendments, **this plan has failed the test of soundness.**

Whilst I welcome, in principle, improved efficiency of the waste process in our area and appreciate the need to be self-sufficient, there needs to be thoughtful consideration of the cumulative impacts of intensifying waste facilities in South London.

Further, there is insufficient data provided to truly establish the waste capacity in South London over the coming years. Without reliable evidence bases and predictive modelling, there is a very real concern that the capacity for waste management is overestimated for the four boroughs with Beddington and the London Borough of Sutton acting as South London's dumping ground. We need to ask serious questions about the fairness of a system that allows one borough to manage 70% of the partnership's waste.

I hope you will consider the points raised in this letter during the examination of the draft South London Waste Plan.

Best wishes,

A handwritten signature in black ink, appearing to read 'Elliot Colburn', with a long horizontal flourish extending to the right.

**Elliot Colburn**

Conservative Member of Parliament for Carshalton and Wallington

[1] SWLP 2021 publication draft, para. 5.5

[2] SWLP 2021 publication draft, para. 3.8

[3] <https://www.gateshead.gov.uk/article/16221/Lockdown-leads-to-big-increase-in-household-waste>

[4] London Environment Strategy 2018, pg. 292

[5] Planning Practice Guidance, Waste, para. 47

[6] <https://modern.gov.sutton.gov.uk/documents/s69723/Residents%20Survey%20-%20Report.pdf>

[7] SWLP Technical Paper Appendices 2021, pg. 136

[8] National Planning Policy for Waste 2014, policy 5

[9] London Plan 2019, para. 9.8.14

[10] London Environment Strategy 2018, pg. 323