

## South London Waste Plan Boroughs Response to Matter 5

**CROYDON**



### **Matter 5:**

**Does the Plan set out effective mechanisms for its implementation and monitoring?**

#### **Issue (i):**

**Does the Plan set out effective mechanisms for its implementation and monitoring?**

#### **M5 (i) 1**

**Is it clear how the implementation of waste planning permissions and compliance with any conditions will be monitored?**

**1.1** Yes - Policy WP10 'Monitoring and Contingencies' states that "*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 will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.*"

**1.2** Policy WP3 states that "*The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report (AMR)*". Para 5.52 of the supporting text under Policy WP9 'Planning Obligations' lists a number of requirements which may need to be set in order to make a waste development acceptable in planning terms and which may need to be secured through a planning obligation (usually via a Section 106 agreement) rather than by condition. The four partner boroughs have an ongoing duty to monitor the implementation of S106 agreements through their respective AMRs.

**1.3** However, a modification is proposed to the supporting text to WP10 to make this clearer. In addition, some changes to the Monitoring Table are proposed in Annex 1 to this statement, including modifications proposed by other Matter Statements relating to monitoring.

#### **Proposed Modification**

##### **Paragraph 5.54, new bullet**

- **Analysing waste planning permissions and compliance with conditions**

**M5 (i) 2**

**Is it clear how the monitoring arrangements demonstrate that the Plan takes a proactive approach to mitigate and adapting to climate change?**

**1.4** Yes – Policy WP10 ‘Monitoring and Contingencies’ includes a commitment to monitor the effectiveness of the plan in achieving its stated policy objectives and targets through the publication of the Sutton AMR. The monitoring and contingencies table in Appendix 1 of the draft plan lists some of the key indicators to be monitored. Indicator 10 on ‘Development Achieving BREEAM and/or CEEQUAL ‘Excellent’ will enable the carbon performance of waste developments and the implementation of climate change adaptation measures to be monitored since much of the relevant information will be readily available from the submitted BREEAM/CEEQUAL ‘design stage’ and ‘post construction’ reports.

**1.5** However it is proposed to include further indicators and targets within Appendix 1 as shown to ensure that climate change issues are addressed as part of the proposed monitoring framework. These modifications (alongside others proposed in this statement) are set out a revised Monitoring and Contingencies Table set out Annex 1 to this Statement

**M5 (i) 3**

**Are the monitoring arrangements for the Plan consistent with the London Plan insofar as it states that plans “safeguarding waste sites should ... be regularly reviewed and updated to take account of development that may lead to the integration of waste sites or appropriate relocation of lost waste sites?”**

**1.6** Yes – this issue is covered by Indicator 4 in Appendix 1 of the plan entitled ‘Existing waste sites safeguarded’. This sets a target for “100% of safeguarded existing sites to be operational or to have compensatory provision provided”. In the event that plan monitoring has identified that compensatory provision has not been delivered, there is an undertaking as part of this indicator to analyse the boroughs’ development management procedures to identify the reasons for this and to possibly revise the plan to provide more sites in light of evidence.

**M5 (i) 4**

**How do the monitoring arrangements provide for a demonstration that waste is being transported sustainably? Should the concept of ‘waste miles’ be considered and any targets set/monitored for waste transport other than by road?**

**1.7** Policy WP4 on ‘Sites for Compensatory Provision’ requires that proposals should have particular regard to sites which “(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”.

**1.8** Policy WP5 on ‘Protecting and enhancing amenity’ states that particular regard should be given to “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” and identifies a number of supporting documents that may be required (including modifications proposed in response M4 (i) 11), including transport assessments, transport management strategies such as a Delivery Servicing Plan/Freight Plan, a Route Management Strategy, a Construction Logistics Plan and a Travel Plan.

**1.9** In addition, it should be noted that applicants for compensatory or intensified waste facilities will be required to submit a Transport Assessment in line with the relevant borough Local Plan policy and under Policy T4 of the London Plan.

**1.10** While opportunities for the sustainable transport of waste using modes other than by road are very limited within South London, it is proposed to introduce the following changes to Policy WP5 and to include an additional indicator within Appendix 1 as shown below:

**Proposed Modifications**

**WP5 Protecting and Enhancing Amenity**

(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;~~

(viii) opportunities to minimise 'waste miles' **and the potential of using sustainable modes of transport for incoming and outgoing materials**

**Additional modifications to the Monitoring and Contingencies Table are set out in Annex 1 to this statement.**

<b>M5 (i) 5</b>	<b>Are the triggers and intervention levels for any further “management actions” (e.g review of/updates to the Plan) clearly expressed in the Monitoring and Contingencies Table? And are changes necessary to ensure clarity and effectiveness in these regards?</b>
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**1.11** Yes – it is considered that the Management Actions identified for each indicator within the Monitoring Contingencies Table (as amended) clearly set out the triggers and intervention levels.

<b>M5 (i) 6</b>	<b>Do the monitoring arrangements adequately address firstly, situations where safeguarded sites that are not currently operational do not come onstream as anticipated; and secondly, instances where waste facilities cease to operate without a change of use of the site concerned?</b>
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**1.12** In relation to the first point, it is acknowledged that the monitoring contingencies and management actions identified in Appendix 1 do not fully address the scenario where safeguarded waste sites that are not currently operational do not come on-stream as anticipated. The following changes are therefore proposed to Indicators 1, 2 and 4.

**1.13** However, in relation to the second point, it is considered that the monitoring contingencies identified in Appendix 1 under Indicators 1, and 4 do adequately address instances where waste facilities cease to operate without a change of use of the site concerned under the heading of 'site closing' (see management actions listed in final row of each table).

**M5 (i) 7**

**Does the monitoring process provide for co-operation and participation and are appropriate participants involved?  
Where monitoring indicates that review/update of the Plan’s policies might be necessary how would the monitoring and implementation framework ensure that Boroughs engage with Dtc bodies on a constructive, an active and an ongoing basis on any relevant strategic matters?**

Does the monitoring process provide for co-operation and participation and are appropriate participants involved?

**1.14** Although the Monitoring and Contingency Table set out in Appendix 1 of the draft plan lists a number of ‘delivery partners’ who may potentially be involved in determining whether it is necessary to implement any of the contingency actions in light of the monitoring (identified as the GLA, LWARB, SLWP boroughs, EA and waste management industry), the need for wider co-operation and participation in line with Dtc principles is not sufficiently clear in the wording of Policy WP10. Modifications are therefore proposed below.

Where monitoring indicates that review/update of the Plan’s policies might be necessary how would the monitoring and implementation framework ensure that Boroughs engage with Dtc bodies on a constructive, an active and an ongoing basis on any relevant strategic matters?

**1.15** It is considered that the commitment set out in Policy WP10 to monitoring the effectiveness and implementation of the plan on an annual basis through the Sutton AMR and the identification of delivery partners/Dtc bodies in Appendix 1 for the purpose of determining whether contingency actions should be implemented is sufficient to address this issue.

**Proposed Modifications**

**Additional paragraph after 5.56**

**5.57 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.**

**WP10 Monitoring and Contingencies**

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton’s Authority Monitoring Report (**AMR**) will report **on the outcome of plan** the monitoring and the boroughs, in consultation with each other **and with other relevant Duty to Cooperate bodies as appropriate such as the GLA, LWARB, EA, the South London Waste Partnership, other local authorities and the waste management industry.** will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.

**M5 (i) 8**

**Where compensatory provision is not delivered should management actions include assessments of site availability/viability either as part of existing development plan related activities or as a specific piece of work?**

**1.16** Yes – the management actions identified in the Monitoring and Contingencies Table (Appendix 1) highlights the need for updated assessments of site availability/viability to be carried out either as part of existing development plan related activities or as a specific piece of work. Any compensatory provision not delivered will be initially reviewed as part of the AMR. Any detailed assessments of site availability/viability would have to be part of a review of the Plan as further funding would be needed to carry out this work.

**1.17** Modifications (alongside others proposed in this statement) are set out a revised Monitoring and Contingencies Table set out Annex 1 to this Statement

**Proposed Modifications**

**Appendix 1 Monitoring and Contingencies Table**

For indicators WP1, WP2, WP3 and WP4, amend 'Management Actions' as follows:

**Management Actions**

... **Compensatory provision not delivered** – Analyse the boroughs' Development Management procedures to identify this 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

**M5 (i) 9**

**Is the language of Indicator 8 consistent with national policy and statutory provisions relating to the conservation of heritage assets? Should adjustments be made to Indicator 8 to refer more specifically to Conservation Areas identified pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990?**

**1.18** While the language of Indicator 8 is considered to be broadly consistent with national policy and statutory provisions relating to the conservation of heritage assets, the following changes are proposed to Indicator 8 in the Monitoring and Contingencies table (Appendix 1) to refer more specifically to Conservation Areas identified pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990.

**1.19** Modifications (alongside others proposed in this statement) are set out a revised Monitoring and Contingencies Table set out Annex 1 to this Statement

## Annex 1 – Modifications to Plan Appendix 1 Monitoring and Contingencies

- ~~Strikethrough~~ text indicates a proposed deletion
- **Bold Underlined** indicates a proposed addition to the text

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

<b>Indicator 1.1</b>	<b><u>Household, commercial and industrial (HCI) waste managed within the plan area against the combined London Plan 2021 apportionment (tonnes per annum)</u></b>
<b><del>Indicator 1 (for Policy WP1)</del></b>	<b><del>Household and Commercial and Industrial Waste Managed</del></b>
<b>Target</b>	<del>By 2036,</del> 929,750 tonnes per annum <b><u>by 2036 (meet combined apportionment for HCI waste)</u></b>
<b>References</b>	<b><u>London Plan Policy: SI 8</u></b> Plan Objective: 1 <b>and 3</b> SA Objective: 1
<b>Monitoring</b>	Monitor annually against target <b><u>using the Environment Agency’s waste data interrogator (WDI)</u></b> Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity <del>in the planning pipeline</del> <b><u>in any extant planning permissions</u></b> <b><u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u></b> <b><u>Report in LB Sutton AMR</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <b><u>and Duty to Cooperate partners</u></b>
<b>Management Actions</b>	<b>Sites closing</b> – 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. <b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify this failure. <b><u>Undertake or commission updated assessments of site availability/viability as</u></b>

	<u>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.
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## Policy WP2 – Strategic Approach to other forms of waste

<b>Indicator 2.1</b>	<b>C&amp;D waste managed within the plan area against forecast arisings (tonnes per annum)</b>
<b>Indicator 2 (for Policy WP2)</b>	<b><del>Construction and Demolition Waste Managed</del></b>
<b>Target 2.1</b>	<del>By 2036</del> , 414,380 tonnes per annum <u>by 2036 (net self-sufficiency for C&amp;D waste)</u>
<b>References</b>	<u>London Plan Policy: SI 8</u> Plan Objective: 2 <u>and 3</u> SA Objective: 1
<b>Monitoring</b>	Monitor annually against 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 <del>in the planning pipeline</del> <u>in any extant planning permissions</u> <u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u> <u>Report in LB Sutton Authority Monitoring Report (AMR)</u>
<b>Delivery Partners</b>	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>
<b>Management Actions</b>	<b>Sites closing</b> – 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 <b>Compensatory provision not delivered</b> – 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

<b>Indicator 2.2</b>	<b>Number of planning permissions for new radioactive, agricultural or hazardous waste Facilities (either transfer or management)</b>
<b>Indicator 3 (for Policy WP2)</b>	<b>Radioactive, Agricultural and Hazardous Waste Treated</b>
<b>Target</b>	0 permissions
<b>References</b>	Plan Objective: 2 SA Objective: 1
<b>Monitoring</b>	Monitor annually against target <b><u>using the GLA's Planning London Datahub</u></b> <b><u>Monitor cross-boundary waste movements of waste through the Duty to Cooperate</u></b> <b><u>Report in LB Sutton Authority Monitoring Report (AMR)</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <b><u>Duty to Cooperate partners</u></b>
<b>Management Actions</b>	<b>Sites permitted</b> – Analyse the boroughs' Development Management procedures to identify this failure. Examine whether there is any unidentified need for these streams of waste. Possibly revise South London Waste Plan in light of evidence.

### **Policy WP3 – Existing Waste Sites**

<b>Indicator 3.1</b>	<b>Proportion of safeguarded waste sites to be operational or to have compensatory provision provided (%)</b>
<b>Indicator 4 (for Policy WP3 &amp; WP4)</b>	<b>Existing Waste Sites Safeguarded</b>
<b>Target</b>	100% of safeguarded <b>existing waste</b> sites to be operational or to have compensatory provision provided
<b>References</b>	<b><u>London Plan Policy: SI 8</u></b> Plan Objective: 3 SA Objective: 1
<b>Monitoring</b>	Monitor annually against target <b><u>using the GLA's Planning London Datahub</u></b>



	<b><u>Report in LB Sutton AMR</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	<p><b>Sites closing</b> – 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><b>Compensatory provision not delivered</b> – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. <b><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></b> Possibly revise South London Waste Plan to provide more sites in light of evidence.</p>
<b><u>Indicator 3.2</u></b>	<b><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></b>
<b><del>Indicator 4</del></b> <b><del>(for Policy WP3 &amp; WP4)</del></b>	<b><del>Existing Waste Sites Safeguarded</del></b>
<b><u>Target</u></b>	<b><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></b>
<b><u>References</u></b>	<p><b><u>London Plan Policy: SI 8</u></b></p> <p><b><u>Plan Objective: 7</u></b></p> <p><b><u>SA Objective: 3</u></b></p>
<b><u>Monitoring</u></b>	<p><b><u>Monitor annually against target using the GLA’s Planning London Datahub</u></b></p> <p><b><u>Report in LB Sutton AMR</u></b></p>
<b><u>Delivery Partners</u></b>	<b><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></b>

<b><u>Management Actions</u></b>	<p><b><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></b></p> <p><b><u>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.</u></b></p>
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### **Policy WP4 – Sites for Compensatory Provision**

<b><u>Indicator 4.1</u></b>	<b><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></b>
<b><u>Indicator 4 (for Policy WP3 &amp; WP4)</u></b>	<b><u>Existing Waste Sites Safeguarded</u></b>
<b><u>Target</u></b>	<b><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></b>
<b><u>References</u></b>	<p><b><u>London Plan Policy: SI 8</u></b></p> <p><b><u>Plan Objective: 1 and 2</u></b></p> <p><b><u>SA Objective: 1</u></b></p>
<b><u>Monitoring</u></b>	<p><b><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></b></p> <p><b><u>Report in LB Sutton AMR</u></b></p>
<b><u>Delivery Partners</u></b>	<b><u>Greater London Authority (GLA), London Waste and Recycling Board (LWARB), So South London Waste Partnership ,South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry</u></b>

<b><u>Management Actions</u></b>	<p><b><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></b></p> <p><b><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></b></p>
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### **Policy WP5 – Protecting and enhancing amenity**

<b><u>Indicator 5.1</u></b>	<b><u>The proportion of planning permissions for intensified or compensatory waste facilities with a fully enclosed covered building (%)</u></b>
<b><u>Indicator-5 (for Policy WP5(b))</u></b>	<b><u>Compensatory or Intensified Sites with Fully Enclosed Covered Building</u></b>
<b>Target</b>	100% of <b><u>planning</u></b> permissions <b><u>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</u></b>
<b>References</b>	<p><b><u>SLWP Policy WP5(b)</u></b></p> <p>Plan Objective: 6</p> <p>SA Objective: 11</p>
<b>Monitoring</b>	<p>Monitor annually against target <b><u>using the relevant borough development monitoring procedures and the GLA’s Planning London Datahub</u></b></p> <p><b><u>Report in LB Sutton AMR</u></b></p>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry

<b>Management Actions</b>	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why <b>proposals on</b> sites without a fully enclosed covered building <b>on the parts of site where unloading, loading, storage and processing takes place</b> have not been permitted.  Possibly provide design guidance.  Possibly revise South London Waste Plan in light of evidence
<b>Indicator 5.2</b>	<b><u>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)</u></b>
<b>Indicator 6 (for Policy WP5(e))</b>	<b><u>Development on Green Belt, Metropolitan Open Land and Open Space</u></b>
<b>Target</b>	<b><u>0 planning permissions for intensified or compensatory waste facilities located</u></b> on Green Belt, Metropolitan Open Land (MOL) and Open Space <b><u>(0 ha)</u></b>
<b>References</b>	<b><u>SLWP Policy WP5(b)</u></b>  Plan Objective:6  SA Objective: 6
<b>Monitoring</b>	Monitor annually against target <b><u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b>  <b><u>Report in LB Sutton AMR</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
<b>Management Actions</b>	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
<b>Indicator 5.3</b>	<b><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></b>

<b>Indicator 7</b> (for Policy WP5(e))	<b>Development on Nationally, Regionally or Locally Designated Nature Conservation Areas</b>
<b>Target</b>	0 ha of development on <b><u>0 planning permissions for intensified or compensatory waste facilities located</u></b> on nationally, regionally or locally designated nature conservation areas <b><u>(0 ha)</u></b>
<b>References</b>	<b><u>SLWP Policy WP5(c)</u></b>  Plan Objective :6 SA Objective: 12
<b>Monitoring</b>	Monitor annually against target <b><u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u></b>  <b><u>Report in LB Sutton AMR</u></b>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry <b><u>and Natural England</u></b>
<b>Management Actions</b>	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 South London Waste Plan in <b><u>the</u></b> light of evidence
<b>Indicator 5.4</b>	<b><u>Number and site area of planning permissions for intensified or compensatory waste facilities located within Conservation Areas (number/hectares)</u></b>
<b>Indicator 8</b> (for Policy WP5(e))	<b>Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas</b>
<b>Target</b>	0 ha of development on <b><u>0 planning permissions for intensified or compensatory waste facilities located within Conservation Areas (0 ha)</u></b>
<b>References</b>	<b><u>SLWP Policy WP5(c)</u></b>  Plan Objective :6 SA Objective: 14

<b>Monitoring</b>	Monitor annually against target <u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u> <u>Report in LB Sutton AMR</u>
<b>Delivery Partners</b>	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>
<b>Management Actions</b>	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites within <del>Nationally, Regionally or Locally Designated Heritage</del> Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence

<b>Indicator 5.5</b>	<u>Number and proportion of waste developments granted planning permission against Environment Agency advice relating to flood risk, groundwater risk and air emissions (%)</u>
<b>Indicator 9 (for Policy WP5(c))</b>	<del>Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)</del>
<b>Target</b>	<del>0 ha of development</del> <u>0 waste developments granted planning permission permitted</u> against Environment Agency advice <del>0 ha of development on</del>
<b>References</b>	<u>SLWP Policy WP5(c)</u> Plan Objective: 6 SA Objective: 7
<b>Monitoring</b>	Monitor annually against target <u>using the relevant borough development monitoring procedures and the GLA's Planning London Datahub</u> <u>Report in LB Sutton AMR</u>
<b>Delivery Partners</b>	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

<b>Management Actions</b>	<p>Analyse the boroughs' Development Management procedures to identify any failure.</p> <p>Examine whether there are specific reasons why sites have been permitted contrary to Environment Agency advice.</p> <p><b>Possibly revise South London Waste Plan in light of evidence</b></p>
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### **Policy WP6 – Sustainable design and construction of waste facilities**

<b>Indicator 6.1</b>	<b>The proportion of planning permissions for intensified or compensatory waste facilities achieving a BREEAM and/or CEEQUAL 'Excellent' rating (%)</b>
<b>Indicator 10 (for Policy WP6)</b>	<b>Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating</b>
<b>Target</b>	100% of <b>planning permissions for intensified or compensatory waste facilities achieve a BREEAM and/or CEEQUAL 'Excellent' rating</b>
<b>References</b>	<p><b><u>SLWP Policy WP6(a)</u></b></p> <p>Plan Objective: 5</p> <p><b><u>SA Objective: 8</u></b></p>
<b>Monitoring</b>	<p>Monitor annually against target <b><u>using the relevant borough development monitoring procedures</u></b></p> <p><b><u>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</u></b></p> <p><b><u>Report in LB Sutton AMR</u></b></p>
<b>Delivery Partners</b>	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), <b><u>South London Waste Partnership</u></b> , South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry, <b><u>Building Research Establishment</u></b>
<b>Management Actions</b>	Analyse the boroughs' development management procedures to identify any failure. Examine whether there are specific reasons why <b><u>waste facilities are not achieving BREEAM and/or CEEQUAL 'Excellent' sites without a fully enclosed covered building have not been permitted.</u></b>

	<p><del>Possibly provide design guidance.</del></p> <p><del>Possibly revise South London Waste Plan in light of evidence</del></p>
<b>Indicator 6.2</b>	<b>Net carbon dioxide (CO<sub>2</sub>) reductions delivered by waste management facilities compared to Part L of the 2013 Building Regulations (% and tpa)</b>
<b>Targets</b>	<p><u>100% of planning permissions for intensified or compensatory waste developments achieving at least a 35% on-site reduction in CO<sub>2</sub> emissions 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 CO<sub>2</sub> emissions through developer contributions to fund carbon reduction measures elsewhere;</u></p>
<b>References</b>	<p><u>London Plan Policy SI 2</u></p> <p><u>SLWP Policy WP6(b)</u></p> <p><u>Plan Objective: 5</u></p> <p><u>SA Objective: 5</u></p>
<b>Monitoring</b>	<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 LB Sutton AMR</u></p>
<b>Delivery Partners</b>	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
<b>Management Actions</b>	<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 CO<sub>2</sub> emissions and carbon offsetting</u></p> <p><u>Possibly provide design guidance</u></p>



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

### **Policy WP7 – The benefits of waste**

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