

DRAFT SOUTH LONDON WASTE PLAN
SCHEDULE OF CONSULTEES AND REPRESENTATIONS

SCHEDULE OF CONSULTEES

No	Name
Con1	The Mayor of London
Con2	Transport for London
Con3	National Grid (agent Avison Young)
Con4	Natural England
Con5	Highways England
Con6	Sport England
Con7	Thames Water Utilities Ltd
Con8	Buckinghamshire County Council
Con9	Cheshire West and Chester Council
Con10	Wandle Valley Forum
Con11	Resident AO
Con12	Resident DW
Con13	Resident TS
Con14	Resident TP
Con15	King Concrete (Mr M Kelly as agent)
Con16	Maguire Skips (Mr M Kelly as agent)
Con17	Hinton Skips (Mr M Kelly as agent)
Con18	Day Group Ltd (Firstplan as agent)
Con19	D B Cargo (Firstplan as agent)
Con20	Resident AH
Con21	Wimbledon Park Residents Association (Peter West, Spokesperson for Planning)
Con22	Wimbledon Park Ward Councillors (Councillors Janice Howard, Oonagh Moulton, Edward Gretton)
Con23	London Borough of Richmond
Con24	Stephen Hammond, MP for Wimbledon
Con25	South London Waste Partnership
Con26	Essex County Council
Con27	Wimbledon East Hillside Residents Association (Leigh Terrafranca, Spokesperson for Planning)
Con28	Councillor Nick Matthey (Beddington North Ward Councillor)

No	Name
Con29	The Wimbledon Society (Chris Goodair, Chair, Planning & Environment Committee)
Con30	Resident DT
Con31	Sutton & Croydon Green Party (Peter Underwood)
Con32	Merton Conservatives Group (Alan Gibbs)
Con33	Merton Liberal Democrat Group (Councillor Jenifer Gould)
Con34	South West London Air Quality Monitoring Group (Jim Duffy)
Con35	777 Demolition & Haulage (BPP Consulting)
Con36	Spaces4Work (BPP Consulting)
Con37	Environment Agency
Con38	Surrey County Council
Con39	Resident EG
Con40	SUEZ
Con41	Resident PF
Con42	Viridor
Con43	Resident MW
Con44	Historic England
Con45	Resident CB
Con46	Resident BC
Con47	Resident GK

SCHEDULE OF REPRESENTATIONS

Rep No	Con No	Type of Representation	Representation	Comment
General Comments				
1.	Con 1: The Mayor of London	General Comments	<p>Thank you for consulting the Mayor of London on the Publication Stage of the draft South London Waste Plan (SLWP). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out be under the relevant policy or section.</p> <p>The Mayor provided comments on the earlier Issues and Options consultation document on 18 December 2019 (Ref: LDF36/SLWP02/HA01). This letter follows on from that earlier advice and sets out where you should make further amendments to be more in line with the current London Plan and the Intend to Publish (ItP) London Plan.</p> <p>The draft new London Plan The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish (ItP) version of the London Plan was published on the 17 December 2019. The Mayor received directions from the Secretary of State on 13 March 2020 in the Annex to his response and this letter takes these into consideration, particularly direction DR4 in relation to policies E4 and E7 of the ItP London Plan. The ItP London Plan and its evidence base are now material considerations and have significant weight, except specifically where affected by the tracked changes set out in the SoS's Annex. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of the Development Plans for the South London Waste Plan authorities and contain the most up-to-date policies.</p> <p>The SLWP is required to be in general conformity with the London Plan and the Mayor's comments below address how the draft Plan should be</p>	<p>Noted.</p> <p>The Councils response to the Mayor's areas of objection are set out below under the relevant policy or section.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>amended to address outstanding issues of non-conformity with the ItP London Plan.</p> <p>General The Mayor welcomes many of the commitments to changes and clarifications made in light of his response to the Issues and Preferred Options (I&PO) consultation document. In particular, addressing capacity for the previously identified shortfall in construction and demolition waste and clarifying that intensification will provide additional capacity and not be relied upon to meet London Plan apportionment targets.</p> <p>The opportunity to provide feedback on a pre-consultation draft Submission version of the SLWP was welcomed but the Mayor was disappointed that no additional changes were made to the draft plan following his officer's advice and guidance as set out in a letter dated 3rd July 2020.</p> <p>As currently drafted the Publication Stage version of the SLWP is not in conformity with the Intend to Publish London Plan 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 ItP London Plan. The letter below addresses these and other matters in more detail, setting out the necessary amendments that would ensure that the final version of the SLWP is consistent with the ItP London Plan.</p>	
2.	Con 2: The Mayor of London	Non-Conformity	<p>The South London Waste Plan should take note that three proposed safeguarded waste sites at the Weir Road Industrial Estate, LB Merton (M10, M12 and M14) were included in Transport for London's Crossrail 2, 2015 consultation (https://consultations.tfl.gov.uk/crossrail2/october2015/user_uploads/s13.pdf) for use as a future worksite and depot for Crossrail 2, but is not included within the Safeguarding Direction. Although at this stage the Mayor doesn't have any more certainty regarding the requirement for these sites, this should at least be included in the 'issues to consider' set out in the plan.</p>	Disagree. The site is outside Crossrail 2 Safeguarding Direction and according to TfL's Crossrail2 website (see extract below), the project is no longer funded. If the next government were to fund it, post 2024, it is likely to be delivered beyond the lifetime of this plan. There is therefore no evidence that these waste and industrial sites

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				<p>will be required to be demolished within this plan period.</p> <p><i>https://crossrail2.co.uk/news/crossrail2-update-november-2020/ : “Given TfL’s current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London’s growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right”.</i></p>
3.	Con2 Transport for London	Unsound – Not positively prepared	<p>Further to TfL’s detailed comments on the Issues and Preferred Options Consultation (dated 20th December 2019), TfL has the following comments on the publication document.</p> <p>Please note that these are additional to the comments raised by the GLA, and to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with property interest.</p> <p>The issues raised in TfL’s previous comments have largely been addressed, which is welcomed. The single outstanding point relates to the three proposed safeguarded waste sites located in the Weir Road Industrial Estate (M10, M12 and M14). Although these sites are not included within the Safeguarding Direction, they were identified in a 2015 consultation for use as a future worksite and depot to support Crossrail 2. It is requested that the ‘issues to consider’ are updated for each of these sites to include a</p>	<p>Noted.</p> <p>Disagree. The site is outside Crossrail 2 Safeguarding Direction and according to TfL’s Crossrail2 website (see extract below), the project is no longer funded. If the next government were to fund it, post 2024, it is</p>

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			<p>reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.</p> <p>(Note: For ease of reference, part of the representation is repeated against Sites M10, M12 and M14)</p>	<p>likely to be delivered beyond the lifetime of this plan. There is therefore no evidence that these waste and industrial sites will be required to be demolished within this plan period.</p> <p><i>https://crossrail2.co.uk/news/crossrail2-update-november-2020/ : "Given TfL's current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London's growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right".</i></p>
4.	Con3: National Grid (Avison Young agent)	General comments	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p>	<p>Noted.</p> <p>All the sites highlighted in the table recognise the proximity of National Grid assets and the draft South London Waste Plan (SLWP) includes references to safety clearances in the 'Issues to Consider' section of the site safeguarding.</p>

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			<p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below.</p> <table border="1"> <thead> <tr> <th>Development Plan Document Site Reference</th> <th>Asset Description</th> </tr> </thead> <tbody> <tr> <td>B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA</td> <td>YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1</td> </tr> <tr> <td>European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX</td> <td>YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1</td> </tr> <tr> <td>Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX</td> <td>ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1</td> </tr> <tr> <td>777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TE</td> <td>275Kv Underground Cable route: BEDDINGTON - WILLESDEN 1</td> </tr> <tr> <td>Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton CR0 4TD</td> <td>YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1 ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1 400Kv Underground Cable route: KINGSNORTH - BEDDINGTON 275Kv Underground Cable route: BEDDINGTON 275KV S/S</td> </tr> <tr> <td>Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton SM3 9QH</td> <td>ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1</td> </tr> <tr> <td>Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH</td> <td>YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1 ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1</td> </tr> </tbody> </table>	Development Plan Document Site Reference	Asset Description	B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA	YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1	European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX	YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1	Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX	ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1	777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TE	275Kv Underground Cable route: BEDDINGTON - WILLESDEN 1	Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton CR0 4TD	YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1 ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1 400Kv Underground Cable route: KINGSNORTH - BEDDINGTON 275Kv Underground Cable route: BEDDINGTON 275KV S/S	Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton SM3 9QH	ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1	Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH	YYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - WIMBLEDON 1 ZZU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON - CHESSINGTON 1	
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			<p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter (<i>See Appendix 1 of the representations Schedule</i>). Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets.</p> <p>Guidance on development near National Grid assets National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.</p> <p>Electricity assets Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p> <p>National Grid's '<i>Guidelines for Development near pylons and high voltage overhead power lines</i>' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid's statutory safety clearances are detailed in their '<i>Guidelines when working near National Grid Electricity Transmission assets</i>', which</p>	

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			<i>can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets</i>	
5.	Con4: Natural England	No comment	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated 3rd September, 2020.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	<p>Noted.</p> <p>For information: Natural England had previously stated at the Issues and Options Stage that, due to the nature of the plan, only a briefing Habitats Screening exercise was necessary. This has been undertaken and is reported in Appendix 2 of the Sustainability Appraisal.</p>
6.	Con5: Highways England	No comment	<p>Thank you for your e-mail of 3 September 2020 inviting Highways England to comment on the above consultation and indicating that a response was required by 22 October 2020.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in particular the A23 and M25.</p> <p>We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We in general, will support proposals that consider sustainable measures which manage down demand and reduces</p>	<p>Noted.</p>

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			<p>the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.</p> <p>The transportation of waste has the potential to generate a significant number of heavy goods vehicle (HGV) trips, a large proportion of which are likely use the SRN. Although individual sites might not have a significant impact, cumulatively, developments could still have the potential to impact the SRN, particularly to road safety. In general we would be concerned with an increase in slow moving HGVs accessing the SRN and the resulting potential impact to the safe and efficient SRN. We support policy WP5 and WP9 which are generally in line with what is set out above, in particular road safety.</p> <p>We support proposals that promote alternatives to road based transport, such as transportation of waste via rail and water. In addition to further minimise potential impacts to the SRN we would look to site operators to identify opportunities to reduce trips during peak periods, this might be through construction and operational management plans to support individual proposals.</p> <p>We are satisfied that the consultation for Draft South London Waste Plan will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). We have no comments or objections.</p>	
7.	Con6: Sport England	No comment	Thank you for consulting Sport England on the above named document. I can confirm that Sport England does not wish to comment.	Noted.
8.	Con8: Bucks County Council	No comment	Thank you for consulting Buckinghamshire Council on the publication of the South London Waste Plan. We appreciate the opportunity to comment on the emerging plan. On this occasion, we have no comments.	Noted.
9.	Con9: Cheshire West and Chester Council	Sound & Legally Compliant	We have identified through the Waste Data Interrogator (2018) that there is a strategic relationship in terms of waste received from London if 'WPA not codeable (London)' is included while filtering data. In 2018, Croydon and WPAs not codeable (London) have sent 3219.28 tonnes (1141.16 tonnes of hazardous and 2078.12 tonnes of non-hazardous) waste to Cheshire West and Chester.	Noted.

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			<p>However, as we are not aware of any major proposed reductions in the current provision of waste disposal facilities within CWaC, this is unlikely to cause strategic cross-boundary issues in terms of future waste movements.</p> <p>In terms of waste removed from CWaC to Croydon, 0.57 tonnes of hazardous waste was removed, hence this would not be considered to be significant.</p> <p>As such, we have no further comments on the draft South London waste Plan (September 2020).</p>	
10.	Con10:Wandle Valley Forum	Unsound – Not justified	<p>Wandle Valley Forum provides support and an independent voice for 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle.</p> <p>We have considered the South London Waste Plan in the context of the Wandle Valley Forum Charter (http://bit.ly/27Yal2m) and in particular its guiding principle for “More consistent planning – Secure common planning policies to leave space along the river bank, support public access, encourage a naturally functioning river, and respect the Wandle’s local character”. This has a particular bearing on the issues identified within the document for some of the specific sites where we believe that the plan is not based on the most appropriate strategy and so is not fully justified.</p> <p>We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the Wandle and warranting an 8m buffer:</p> <ul style="list-style-type: none"> ● M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA ● M10 Maguire Skips, 36 Weir Court, Merton SW19 8UG ● M12 NJB Recycling, 77 Weir Road, Merton SW19 8UG ● M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG ● M15 Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA ● M16 Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>We believe the significance of the Wandle and its role as a green corridor and access route, including the Wandle Trail, requires more significant recognition. The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14.</p> <p>We also note the inconsistency in identifying “Protecting the amenity of those using the future Wandle Valley Regional Park” as an issue to consider for site M12 but not for the other sites despite the equal significance of their location in the Wandle Valley Regional Park. This should be addressed in the final plan.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett’s Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites. We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route along the east bank of the Wandle and, where appropriate, to secure its delivery.</p> <p><i>(Note: For ease of reference, part of the representation is repeated against Sites M6, 15 and 16)</i></p>	<p>Disagree, The South London Waste Plan cannot support <u>any</u> development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications for other aspects of south London. The ‘Issues to consider’ section for these sites already contains provisions for the River Wandle.</p> <p>Agree. We will add the reference “Protecting the amenity of those using the future Wandle Valley Regional Park” to sites M6, M10, M14, M15 and M16.</p> <p>Noted. However, it is considered that an expansion to walking routes within Merton is a matter that should come under the remit of the emerging Merton Local Plan.</p>

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11.	Con12: Resident DW	Unsound - Not justified	Get rid of flytips within 3hrs of being made aware of them. Actually clean the streets	Noted. However, these are not matters that the draft SLWP can address.
12.	Con13: Resident TS	Unsound - Not justified	<p>I note the South London Waste Plan intends to increase safeguarding in waste sites and acknowledges the regeneration of areas.</p> <p>However it doesn't appear detail how it intends to protect existing jobs or create local sustainable employment growth.</p> <p>I also note there is no indication the SLWP will adhere to Government guidelines on keeping workplaces COVID secure nor does it outline the contingency planning of such an essential service should the pandemic resurface when the plan is put in place.</p> <p>I await your response.</p>	<p>Noted.</p> <p>Existing jobs will be protected by the safeguarding of existing sites. Sustainable employment growth will occur through the appropriate intensification of existing sites or new sites for compensatory provision.</p> <p>The Government has a number of Covid-19 regulations in place which deal with the impacts of the pandemic and which will operate alongside the South London Waste Plan.</p>
13.	Con14: Resident TP	Sound	<p>Thanks for sending me this document.</p> <p>It looks very comprehensive and will go a long way to facilitating the efficient and environmental disposal of household and industrial waste.</p>	Noted.
14.	Con18: Day Group Ltd (Firstplan as agent)	Sound	<p>We are instructed by our client, Day Group Ltd, to provide the following response in respect of the South London Waste Plan (Submission Version) consultation, September 2020.</p> <p>This response follows that made on behalf of Day Group in January 2020 to the South London Waste Plan - Issues and Preferred Options Consultation. In light of the objections/matters raised by the Day Group response to the earlier consultation, and the positive response that has been made via changes now included in the Draft Submission Version, we would confirm</p>	Noted.

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			<p>that Day Group wish to support the soundness of the SLWP, in particular with regard to the following:</p> <ul style="list-style-type: none"> • Site Safeguarding: C4, Day Aggregates Purley Depot, Approach Road, Croydon CR8 2AL • Policy WP3 - Existing Waste Sites • Policy WP8 - New Development Affecting Waste Sites • Appendix 2 – Sites Counting Towards the Apportionment and C&D Target <p>As required individual response forms have been completed in relation to each of the above parts of the draft SLWP. However, the matters raised by each of the above are interlinked and are as such dealt with jointly within this letter (Statement of Response). This is provided in particular in context of Response Form Question 6 – to provide our comments in support of the soundness of the SLWP.</p> <p>On this basis we have reiterated the relevant background information previously provided which underpinned the need for the changes which have been made to the SLWP from the Issues and Preferred Options stage and now incorporated in the Submission Draft SLWP.</p> <p>In this context it is reconfirmed that Day Group are the operators of the Purley Rail Depot, accessed from Approach Road and located adjacent to and south of Purley Station. The site is identified as ‘Safeguarded Site C4’ within the Draft South London Waste Plan.</p> <p>From the rail depot Day Group operate their rail served aggregates business which includes supply of an on-site concrete batching plant (CBP) and operate a construction and demolition (C&D) waste recycling facility. These types of rail served sites comprise a scarce resource which are particularly difficult to replace. Indeed, the importance of safeguarding of rail served minerals sites is underpinned by policy requirements both at national level and within the existing and emerging London Plan as detailed below. This policy context, together with a full appreciation of how the depot functions and the role these type of facilities play in assisting with the</p>	

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			sustainable supply of building materials, is critical to understanding the basis for the comments made to the South London Waste Plan Consultation and, in summary, to ensure that the identification of the site as 'safeguarded for waste' does not prejudice the future operation of the rail depot and its mineral function.	
15.	Con21: Wimbledon Park Residents' Association	Not legally compliant Unsound – Not justified, not effective, not consistent with national policy	<p>Executive summary</p> <p>The South London Waste Plan 2021-36 aspires to process waste in such a way as to not lead to poor air quality. However, the methodology it uses to assess the consequences of waste management on air quality is deeply flawed.</p> <p>Rather than assess the air pollution in the vicinity of where the waste is being processed it considers the effects on often distance air focus areas which are not all subject to excessive air pollution and are often not significantly affected by the waste sites being assessed.</p> <p>These problems are well illustrated by the waste being processed on Weir Road in the Durnsford industrial estate. As a result of the 2012 South London Waste Plan the surrounding roads now carry very substantial numbers of lorries carrying waste. These are causing increased traffic congestion and levels of air pollution that are in excess of EU limits. The air pollution and traffic congestion due to these plants has, to our knowledge, never been properly assessed by Merton Council and the development of these sites has not been properly controlled. The South London Waste Plan 2021-36, gives a favourable grade to the air quality arising from these sites; a conclusion which local residents know to be incorrect. The increases in traffic and air pollution that have already resulted will not be addressed by any future planning applications as this will only consider even further increases in the future.</p> <p>We propose that the air pollution and traffic generated by waste disposal should be properly assessed in the South London Waste Plan 2021-36. Where this is found to lead to unacceptable levels of air pollution and traffic congestion, restrictions should be placed on the amount of waste being processed on the corresponding sites.</p>	<p>Disagree – No Action.</p> <p>The Draft SLWP is not predicted to give rise to an increase in local air pollution in the vicinity of Weir Road over the plan period for the following reasons:</p> <ul style="list-style-type: none"> • no new waste management sites are being proposed by the plan; • as already highlighted in the draft plan site descriptions, any future intensification of waste operations at the relevant safeguarded sites along Weir Road (i.e. sites M10, M12 and M14) is very unlikely since the respective throughputs per hectare are already high; • in line with Policy SI 1 of the New London Plan and the relevant local planning policies, and any future planning application for new or intensified waste management operations on any of the relevant safeguarded sites would need to be accompanied by an Air Quality Assessment

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			<p>For the reasons discussed below we conclude that the South London Waste Plan 2021-36 is not based on a realistic strategy and as a result it is not effective, deliverable or consistent with National Planning Policy</p> <p>[1] The draft South London Waste Plan 2021-36 contains much well researched information on the waste sites that currently exist and the demands for future waste management. It also contains some good principles which concern the environment and in particular air pollution. At the beginning of the South London Waste Plan we find the statement 2.6 <i>The underlying philosophy for the management of waste is reflected in the waste hierarchy which ranks waste options according to a priority The ranking of the various waste management options is based on current scientific research on how the options would impact on the environment in terms of climate change, air quality, water quality and resource depletion.</i></p> <p>While in the accompanying report “Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment” on page 3 we find the statement <i>Overall, the most important sustainability benefits of the preferred strategy include:.....minimising air pollution and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste- related HGV movements on the strategic/ local road network.....</i> While in section 7.12 on page 96 of this report under the heading Issue 10 Air Quality we find <i>how can the policies and proposals of the plan further mitigate the potential impacts of local air pollution arising both from the operation of new and existing waste management facilities and associated transport movements? and that how can the plan contribute towards improving air quality within identified Air Quality Management Areas (AQMAs) and other areas where national standards for particulates (PM10) and nitrogen oxides (NOx) are currently being breached?</i></p> <p>[2] The last South London Waste Plan in 2012 did contain one section that discussed air pollution, namely <i>WP7: Protecting and Enhancing Amenity; Developments for waste facilities will be required to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.....(e) Air</i></p>	<p>demonstrating that the development is ‘air quality neutral’ and would not:</p> <ul style="list-style-type: none"> - lead to further deterioration of existing poor air quality - create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; or - create unacceptable risk of high levels of exposure to poor air quality. <p>It should also be noted that the South London Waste Plan area is within the Greater London Low Emission Zone, in which, from 1 March 2021, HGVs will have to conform to the cleaner Euro VI standards for both NOx and PM.</p> <p>A fundamental purpose of the sustainability appraisal (SA) process was to develop alternative strategies for the allocation of waste sites across the four boroughs, all of which must, as an absolute minimum, be capable of meeting the 2020 London Plan apportionment target (managing 929,750 tonnes of H&CI waste per annum to 2036).</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p><i>emissions arising from the plant and traffic generated;.....(g) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;....</i></p> <p>While the devastating effects of air pollution were not so widely appreciated in 2012 they are now. Poor air quality in London is killing large numbers of Londoners, indeed around 10,000 a year which is on average 33 people every day. One in eight people in Merton will die as a result of air pollution. So far the number dying from covid is similar to the deaths in the UK each year from air pollution. Waste management involves large numbers of HGV movements which increases air pollution and so inevitably leads to increased mortality rates. As a result the South London Plan 2021-36 should take a much more serious approach to air quality than that taken in the 2012 report. In the South London Waste Plan 2021-36 we find policy <i>WP5 Protecting and Enhancing Amenity (a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.....(v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated.</i> This is essentially the same as policy WP7 in the 2012 South London waste Plan. Point (v) is one of ten requirements mentioned in policy WP7.</p> <p>[3] Although the south London Waste plan 2021-36 does contain some aspirational statements on air quality, which are summarised above in [1], its policy on air pollution, namely WP7, is weak and lacks detail. Also the way the report attempts to assess air pollution is deeply flawed. The South London Waste Plan 2021-36 does not assess the air pollution resulting from a given waste processing site on the surrounding roads by quantifying the effects that the HGV traffic that it generates. Instead it tries to assess the air pollution that results in an “air focus area” (AFA’s). However, these air focus areas are often far from the waste processing site and are not all subject to the HGV traffic generated. To put it bluntly they are essentially irrelevant to the air pollution being generated by a given waste processing site. One can imagine the ridicule that would arise if the proponents of the third run way at Heathrow had argued that the air pollution that a third runway at Heathrow would generated was fine in Skegness and so there was no problem.</p>	<p>It can be seen from the appraisal outcome for Policy WP1 (see SA Matrix, p135) that each of the alternative strategic options would not only meet, but exceed the apportionment by either including industrial areas (Option 2A) or allocating new sites (Option 2B). These options would therefore have significantly greater adverse impacts on air quality than proposed policy WP1 which safeguards existing sites only.</p> <p>Option 3, the ‘Do-nothing’ scenario, would also lead to greater adverse impacts on air quality by allowing Policy WP1 to expire in 2021. This would effectively open the door for new waste sites to be developed on industrial land across the plan area.</p> <p>It is not considered feasible or realistic for new air quality studies to be commissioned as part of the SA process or for new monitoring stations to be established in the vicinity of every safeguarded or operational waste site across the plan area.</p>

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			<p>[4] Air focus areas (AQFA'S) are discussed in the draft London plan 2019 on p322 which contains the statement 9.1.8 <i>are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned national, regional and local measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1).</i></p> <p>[5] The three air focus areas in Merton are given in page 69 of the Sustainability Appraisal part of the South London Waste Plan 2021-36. They are "Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road and also Morden Road/London Road/Morden Hall Road/Martin Way and finally Raynes Park junctions Kingston Road/Bushey Road and Mitcham London Road A216 from Cricket Green to Streatham Road Junction. In footnote 33 of the South London Waste Plan 2021-36 it is stated that "Air Quality Focus Areas are locations that not only exceed the EU annual mean limit value for NO2 but are also locations with high human exposure". On page 72 of the report on air pollution, as measured by Merton, in the three air focus area is discussed. Surprisingly we find that the only results presented are for particulates (PM10) at Merton Road and for NO2 at Morden Civic Centre. There are low levels of particulates at the former while the levels of NO2 at the latter do exceed EU limits. Hence the report presents little evidence that the three air focus areas in Merton do actually have problems with air pollution to a greater extent than other areas in Merton.</p> <p>While the whole of Merton has been designated as an Air Quality Management Area the levels of pollution vary considerable across the borough. There are areas in Merton that do experience high levels of air pollution but these would not seem to be the air focus areas in Merton, mentioned above. In the report NLP/SI/039 air quality focus areas methodology (Mayor of London, Nov 2016) it is stated that it is the responsibility of the borough, in this case Merton, to examine if their air focus areas are still appropriate and whether new areas are required. We are not aware of Merton having reconsidered their air focus areas. Hence</p>	<p>However it should be noted that Figure 6.14 of the SA Report 'Air Quality Focus Areas within the SLWP area' provides a map of NO2 levels based on modelling carried out by the London Atmospheric Emissions Inventory 2016 (the latest version). It can be seen from this map that the areas adjacent to Weir Road remain broadly within legal limits and well away from Air Quality Focus Areas which have been identified on the basis of having a higher level of human exposure to air pollution.</p> <p>Air Quality Focus Areas (AQFA) are considered as part of Merton's monitoring regime and the findings are reported in Annual Status Report. The Wimbledon AQFA shows a trend towards compliance for NO2 levels. Any proposed changes to AQFAs should be presented to the relevant authority.</p> <p>Furthermore, National Planning Policy Guidance (Para 038 Ref: 61-038-20190315) advises that the evidence for policies needs to be proportionate. All four partner boroughs have identified</p>

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			<p>not only are the air focus areas not really relevant to the problem of air pollution generated by the waste processing sites, in addition they do not all seem to be areas that suffer from unduly high air pollution.</p> <p>[6] While our objections apply to the South London Waste Plan as a whole we will now illustrate the problems in Merton and in particular the waste processing that is taking place in Weir Road. The three plants in Weir Road on the Durnsford industrial Estate are - NJB Recycling, 77 Weir Road, Merton (M12 page 71 of South London Waste Plan, Issues and Preferred Options) - Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton (M14 page 73 of South London Waste Plan, Issues and Preferred Options) - Maguire Skips, 36 Weir Court, Merton (M10 page 69 of South London Waste Plan, Issues and Preferred Options) The majority of construction and demolition waste that is processed in Merton is in these sites in Weir Road (90 out of 150 tonnes per annum capacity table 3.4 page 17).</p> <p>[7] The HGV vehicles carrying the waste to and from these sites in Weir Road travel down Durnsford Road, and along Plough Lane or Haydon's Road or Gap Road. In recent years local residents have noticed an alarming increase in lorries carrying waste on these roads. This is obvious to anyone who stands by one of these roads for even a short time. Indeed the number of such HGVs is a very significant fraction of all HGVs travelling on these roads. We are currently quantifying the number of HGV lorries carrying waste to and from Weir Road and we hope to submit these results in a separate document. The air pollution levels on these roads are very high and systematically exceed EU air pollution limits. The NO2 levels, as measured in 2017 (2018) by Merton Council, in Gap Road, Plough Lane and Haydons Road are 47 (45), 46 (45) and 46 (49). These results are significantly over the EU limits. These three roads also have residential housing which is very close to the road side and if one stands near these houses the levels of air pollution is immediately apparent.</p> <p>[8] The three plants on Weir Road (M10, M12 and M14) are assessed on pages 144 and 145 of the South London Waste Plan 2021-36. Under AIR</p>	<p>AQFA and their use for this sub-regional plan, is considered to be proportionate.</p> <p>Measurement results around the Weir Road area have exceeded European limits for NO2 levels but as mentioned above, officers are monitoring and reporting the results. The yearly average NO2 concentrations for 2016-2019, including the unadjusted figures for Jan –Oct 2020, show a slight downward trend.</p> <p>However, it should be recognised that:</p> <ul style="list-style-type: none"> the modelling carried out by the London Atmospheric Emissions Inventory indicates that all parts of the strategic road network within south London are currently affected by elevated NO2 levels along their length. given that sufficient sites must be safeguarded by the plan in order to meet the London Plan apportionment to 2036, the proposed strategy of safeguarding existing waste sites and not allocating new sites still remains the most

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			<p>POLLUTION (10), HEALTH AND QUALITY OF LIFE (15) and SUSTAINABLE TRANSPORT (9). The report finds that all three plants score "+?" for the first two categories and "?" for the last. How can this be when the HGV traffic generated travel along roads that are well over the EU limit for air pollution? It is because they are, in the opinion of the report, not causing air pollution in the air focus areas, the closest of which is Wimbledon Broadway which is about 1.5 km away. Clearly the assessment of air pollution in the South London Waste Plan 2021-36 has little to do with reality. This is not in accord with the claim in the report that <i>waste management options is based on current scientific research</i>, see [1]. It is obvious to local residents these sites should score poorly for all of these categories.</p> <p>[9] The South London Waste Plan 2021-36 should have accurately assessed the sites that were allowed in the 2012 plan and have now been developed. The sites in Weir Road have, as far as we can see, been allowed to develop without any restriction on the number of HGV movements and so the air pollution and traffic congestion they have generated.</p> <p>Examining the planning application of 77 Weir Road, 13/P2545, NJB Recycling Ltd, set before the planning committee on the 16/1/2014 we find that the planning officer notes Policy WP7 of the South London Waste Plan 2012, as stated in [2], and that the proposal has the potential to adversely impact on local air quality due to vehicle numbers.... Emissions from road traffic have been identified as the major source of pollution with the borough and across London. The Mayor of London has also stated that waste transport movements currently account for up to 10 per cent of London's overall traffic movements. This is a very clear statement of the problem. However, Merton Council did not require an environmental statement and the fugitive emissions management and monitoring plan (dust and particulates) by AA Environmental Limited, submitted on 13 July 2013 to support the application, concerned air pollution at the site and has no substantial discussion on pollution on the surrounding roads. Thus it would appear to us that no assessment was made of the air pollution that would be generated on the surrounding roads.</p>	<p>environmentally sustainable and least polluting option available to the SLWP boroughs;</p> <ul style="list-style-type: none"> • closing down existing waste management sites is not an option available to the SLWP, because these operational sites already have planning permission and possess an environmental permit from the Environment Agency. • the tentatively positive scores given in the appraisal matrix for sites M10, M12 and M14 reflect the fact that it is not anticipated that these sites will increase their throughput through intensification and that the level of human exposure in the vicinity of Weir Road is relatively low compared to most other parts of the borough, and especially within Air Quality Focus Areas. Therefore, the basis for appraising these sites positively is because they are appropriately located within industrial areas with good access to the strategic road network and where

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			<p>Indeed the number of HGV movements they have generated has to our knowledge never been quantified and so we simply do not know the increased level of air pollution and so deaths these sites have led to. However, as we have mentioned it is clear to local residents that the number of HGVs using the sites in Weir Road is very large and so they must be significantly contributing to the high levels of air pollution in the local area. In short these plants have been allowed to develop in an unchecked way that is in contravention of the policies set out in the South London Waste Plan. This is far from the statement in policy WP5 which explains that <i>....should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people</i>, see [2].</p> <p>[10] The three plants mentioned above in Weir Road on the Durnsford industrial site are licensed to increase their capacity by about 20, 000 + 27, 000 + 3, 000 = 50, 000 tonnes per annum for the disposal of construction and demolition waste. As a result the number of associated HGV vehicles on Plough Lane, Haydon's Road and Gap Road could significantly increase with a corresponding increase in air pollution and traffic congestion. This would have serious consequences of the health of the residents living near these roads.</p> <p>[11] The South London Waste Plan 2021-36, and Duncan Clarke in defence to our criticism, has quoted National Planning Policy for Waste (Paragraph 7) <i>directs waste planning authorities to concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.</i> The effect of the sites on air pollution is a strategic matter and the South London Waste Plan 2021-36 does take this point of view in its aspirational opening statements, but it contains no real attempt to implement these aims. The report should aim to allow waste processing plants at locations where the HGV traffic that they will generate will not lead to excess air pollution. In its safeguarding considerations it should also consider if the sites introduced in the 2012 report have resulted in such excessive air pollution. This is</p>	<p>there is lower human exposure.</p> <p>The interpretation, implementation and balance of planning policy matters considered with historic planning applications, and contravention of planning or licensing conditions are not matters that in themselves affect the soundness or otherwise of the Draft SLWP.</p> <p>All the sites are in a lawful planning use so they are considered suitable and the plan puts safeguards in place for the intensification of operations. Any future intensification of a site would have to satisfy policies in the SLWP, the London Plan and any relevant policies within borough Local Plans.</p> <p>The Councils consider the South London Waste Plan is legally compliant. Officers have followed the regulations and the Duty to Cooperate meets the relevant tests. These are the sole procedural grounds on which you can say a development plan is not legally compliant.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>particularly important given our greater understanding of air pollution and that the fact that planning procedures that concern air pollution have only relatively recently become effective.</p> <p>These considerations are also particularly important for the sites in Weir Road where, in our opinion, there has been no proper control on HGV numbers and so air pollution has been exerted. Any future planning applications can only increase the air pollution and not reverse the high levels of air pollution which have resulted. Indeed in the South London Waste Plan 2021-36 we find that any future planning application on the Weir Road sites should be <i>Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</i>. There is no mention of air pollution demonstrating once again that the report only pays lip service to air pollution. While it is understandable that the main driving force in the report is to manage waste processing needs this must be done in such a way as to not cause excessive deaths as a result of air pollution.</p> <p>[12] We have previously objected to the South London Waste Plan 2021-36 on grounds of air pollution. In our opinion the Councils have not addressed the issues we have raised and have refused to modify their report. They have made no attempt to justify the use of the irrelevant air focus areas. Their first response contained no correct defence and our reply can be found in the previous submissions. Their second response to our objections was by Duncan Clarke who relied on national policy which we have discussed this in [11] and policy WP5, discussed in [2] onwards. He also invoked Policy</p> <p>SI1 of the New London Plan which states on page 320 that Policy SI1 Improving air quality <i>A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced: 1) Development proposals should not: a) lead to further deterioration of existing poor air quality b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits c) reduce air quality benefits that result from the Mayors or boroughs activities to improve air quality d) create unacceptable risk of high levels of exposure to poor air quality.</i></p>	

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			<p>The waste sites set up in the 2012 South London Waste Plan, and the proposals of the South London Plan 2021-36, have and will lead to significantly increased air pollution. They have delayed the date when the EU limits will be satisfied and have led to unacceptable risk of high levels of exposure to poor air quality. Hence the South London Waste Plan 2021-36 is in contradiction to policy SI1. Later on the New London Plan does mention air focus areas but it refers to developments that are actually in air focus areas not as discussed in the South London Waste Plan 2021-36 sites that are far from them.</p> <p>[13] In terms of the soundness of the plan we find that the plan is not justified as it is not based on the most appropriate strategy and that the plan is not effective or deliverable. As explained in [3-5] the methodology to assess air pollution is deeply flawed and as a result its assessments of air pollution are not correct, see [6-13]. Hence it cannot deliver the aspirations discussed in items [1] and [2]. Furthermore the plan is not consistent with national policy which states that <i>plans may need to consider: what are the observed trends shown by recent air quality monitoring data and what would happen to these trends in light of proposed development and / or allocations; the impact of point sources of air pollution (pollution that originates from one place);ways in which new development could be made appropriate in locations where air quality is or is likely to be a concern, and not give rise to unacceptable risks from pollution.</i></p> <p>The South West Waste Plan 2021-36 has not paid attention to measurements of air quality monitoring data, or the impact of waste sites on surrounding areas, or the fact that some waste processing sites are in areas of high air pollution. Despite its aspirational statements on air quality the report makes no serious attempt to assess the consequences of its plan on air pollution. While it is to be expected that the future needs of waste disposal should be the driving force of the plan this must be done in such a way as to not lead to excessive air pollution.</p> <p>We suspect that the South London Waste Plan 2021-36 is not legally compliant as it is not consistent with the obligation to reduce air pollution. If the report is not changed to take account of our comments we will consider taking out a judicial review. We understand that judicial reviews based on similar grounds have succeeded in the past.</p>	

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			[14] We propose that air pollution and traffic generated by waste disposal should be assessed in the South London Waste Plan 2021-36 and, where this is found to lead to unacceptable levels of air pollution and traffic congestion, restrictions should be placed on the amount of waste being processed on the corresponding sites. While this involves additional work by the councils involved this is justified by the very serious consequences of significantly increased air pollution in areas where it is already very high.	
16.	Con22: Wimbledon Park Ward Councillors (Councillors Janice Howard, Council Oonagh Moulton and Edward Gretton	Not legally compliant Unsound – not justified, not effective, not consistent with national policy	<p>I am writing in support of the submission made by Peter West on behalf of the Wimbledon Park Residents Association for the 2021-2036 future plan.</p> <p>Wimbledon Park Ward has seen an unacceptable rise in waste lorries, skips and juggernauts polluting our residential roads by several waste companies.</p> <p>Some of the vehicles are oversized for the roads and cause traffic jams along their routes.</p> <p>Of particular concern is the Gap Road/Durnsford Road junction where the air quality is particularly bad. Much of which is caused by said vehicles.</p> <p>I have attached the WPRA submission for ease of reference, which we fully endorse.</p>	Noted. A response to the points raised by the WPRA is set out above.
17.	Con23: London Borough of Richmond	Legally Compliant and Sound	<p>We note that the four South London Waste Plan boroughs have sufficient waste management capacity to meet their 2036 target. Specifically, the current existing capacity for Household and Commercial and Industrial Waste is sufficient to meet the Mayor's apportionment and that there is a forecast surplus capacity in 2036. We also note that there is existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and that there is a small surplus for the 2036 forecast.</p> <p>We support the South London Waste Plan proposal to safeguard the existing sites and allow the intensification of the existing sites where appropriate. Additionally, the South London Waste Plan boroughs expect no new sites for waste use except where they are required for compensatory provision.</p>	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
			The amount of waste transferred between the South London Waste Plan boroughs and the LB Richmond upon Thames (as one of the West London Waste Plan authorities) is below the target to be significant, except for Hazardous Waste (which is as noted in the email exchange with Hillingdon set out in the Evidence Base Document Statement of Co-operation (Part 2) (September 2020). The Councils liaise regularly through the London Waste Planning Forum. In light of this, and given the context for the Plan noted above is to meet the Mayor's apportionment figures, it is considered the Duty to Co-operate has been complied with in the preparation of the Plan.	
18.	Con24: Stephen Hammond, MP for Wimbledon	Not legally compliant Unsound – not justified, not effective, not compliant with national policy	I am writing in support of the WPRA [Wimbledon Park Residents Association – Con21] submission and particular concerns about the impact of the sites on Weir Road. I look forward to hearing your comments about the objections.	Noted. The response to the WPRA is provided in this schedule under 'Con21 Wimbledon Park Residents' Association'.
19.	Con26: Essex County Council	Support	Thank you for the opportunity to comment on the South London Waste Plan: Draft for Submission to Government September 2020. Essex County Council acting as the Waste Planning Authority considers that the Statement of Common Ground signed by the two authorities in May 2020 evidences on-going engagement between the two authorities and accurately sets out the position of the two authorities with regards to the emerging South London Waste Plan.	Noted
20.	Con27: Wimbledon East Hillside Residents' Association	Not legally compliant Unsound – Not justified, not effective, not consistent with national policy	WEHRA is a long-standing Wimbledon Residents' Association representing 10 roads boarded by Distributor Roads that carry hundreds of HGVs each day (many of these are waste management vehicles and many try to 'save time' by cutting through residential (access only) roads. There is no funding for Police to enforce so bad behaviour of the waste management companies become the problem of local residents like us. It isn't just air pollution but also the problem of road safety, with so many pedestrians and cyclists who walk to schools, shops and the heavily used Wimbledon Station nearby.	Noted. The response to the WPRA is provided in this schedule under 'Con21 Wimbledon Park Residents' Association'.

Rep No	Con No	Type of Representation	Representation	Comment
			<p>Further, the air quality in our area – dense with schools and family homes – is already unacceptably bad. We can no longer tolerate further deterioration of our precious air quality for the sake of our health and well-being and especially for the sake of young children. (There are thousands of young families living in our area and in Wimbledon Park and many walk to school using footpaths around Weir Road.</p> <p>WEHRA adjoins the roads within the Wimbledon Park Residents' Association. We all care deeply about the health and wellbeing of our local community and are gravely concerned that the proposed 25-year plan is so deeply flawed that it will lead to many local people to move further out from the borough. As air pollution in our area is already around 50% above legal EU limits – ie our air quality is poor as it stands and the SLWP 2021-36 will most certainly make breathing safe even less possible. Thank you for listening to the concerns of the primary stakeholders in Wimbledon – local homeowners.</p> <p>[Reproduction of the representation by the Wimbledon Park Residents' Association (Con21, see above).]</p>	
21.	Con28: Councillor Nick Matthey (Beddington North ward)	Unsound – Not justified	<p>Email of 21 October</p> <p>The shortcomings of the South London Waste Plan.</p> <p>It's best first to look at why Beddington has become the dumping ground for four boroughs waste and from areas far beyond the area that comprises the SLWP</p> <p>Liberal Democrat, Conservative and Labour administrations were in power in 2013 at respectively Kingston, Merton and Croydon. They did not want to deal with the political ramifications of siting an incinerator in their boroughs. The only borough that thought it had sufficient political power to have an incinerator without the ruling party losing control in the 2014 local elections was Sutton. The Liberal Democrats with nearly thirty years of uninterrupted control felt they had the in-depth hold over the borough with two Liberal Democrat MPs and 43 Liberal Democrat councillors going into the 2014 election that the incinerator would not be an issue.</p>	<p>Noted.</p> <p>Not a Draft SLWP matter.</p>

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			<p>The Liberal Democrats increased the number of Councillors to 45 in this election. This dropped to 44 after I found out the links between the chair and secretary of Sutton Liberal Democrats and the managing director and Viridor the incinerator builder. I was thrown out the Liberal Democrats for breaking their code of silence.</p> <p>Croydon Labour under Tony Newman won control of Croydon Council on an election promise of getting rid of the incinerator.</p> <p>The Liberal Democrats in Kingston lost power as their former council leader had been imprisoned for downloading large quantities of child pornography. Interestingly the person chosen to try and crisis manage that situation is now the representative of the SLWP. The logic being if you are good enough to help a council with its PR when it's revealed that the council leader is a paedophile. Then you should have no trouble explaining why an incinerator can only bring benefits to local communities.</p> <p>The situation in 2020 in Sutton is that there are no Liberal Democrat MPs and the number of Lib Dem councillors has dropped to 33, the Chief Executive, Mr Niall Bolger, a keen supporter of the Incinerator has left the borough. In 2017 Sutton council featured more times in Private Eyes Rotten Boroughs more times than any other London Borough. Guido Fawkes also picked up the unhealthy relationship between Sutton Liberal Democrats and Viridor.</p> <p>What this means is the South London Waste Plan should not attempt to funnel all its waste into Beddington without realising that there will be further severe political consequences for Sutton Liberal Democrats.</p> <p>Also, environmental views on waste have changed and it is abundantly clear that incineration of MSW has a disastrous environmental impact. Incinerator operators are not benign philanthropists who send money via their charities to help local politicians by improving churches. They are in business to make money. They do this charging up to 800% more to burn waste than to landfill it. A typical incinerator has as its feedstock waste</p>	<p>Not a Draft SLWP matter.</p> <p>Not a Draft SLWP matter.</p> <p>Noted. The ERF has planning permission and an Environment Agency license. The emissions from the ERF were considered at the planning application stage and the ERF is subject to</p>

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			<p>which has a 40-55% plastic content. Burning plastic though highly profitable makes a mockery of the idea that energy from incinerators is low carbon. This is clearly explained in “The climate change impact of burning municipal waste in Scotland”. This study quantifies the climate change impacts of burning residual municipal waste in Energy from Waste (EfW) plants in Scotland in 2018. It measures climate change impacts in two ways: carbon intensity and greenhouse gas emissions.</p> <p>Carbon intensity is a standard approach for comparing the climate change impacts of different energy generation technologies. In this study, the carbon intensity of EfW plants is compared to the UK national grid average. The results show that the carbon intensity of EfW plants is twice as high as the grid average. EfW carbon intensities would remain above the grid average even the plants were converted to Combined Heat and Power systems, demonstrating that EfW can no longer be considered a low carbon technology in the UK. (Which means that Sutton Council is wasting its time and taxpayers money in pressing ahead with SDEN its devolved energy network. No matter how extensive the heat network there is no way that pumping hot water 24/7 around South London will ever improve the appallingly high release of carbon dioxide for each kWh of electricity supplied to the grid.</p> <p>The study also considered greenhouse gas emissions using a Life Cycle Assessment approach. The carbon impacts of sending one tonne of residual municipal waste to either EfW or landfill were compared. Average EfW impacts were 15% lower than landfill in 2018. However, changes in waste composition mean that EfW impacts are expected to rise. Small changes in composition could push EfW impacts above landfill, leading to unnecessary climate change emissions. What this means that the South London Waste Partnership has managed to sign up to a 25 Year deal burning waste that makes no environmental sense and is contrary to any notion of becoming carbon neutral this century</p> <p>Why the South London Waste Plan is flawed?</p>	<p>ongoing monitoring by the Environment Agency. As such the draft SLWP proposes to safeguard the site for waste management for the plan period</p> <p>The National Planning Policy for Waste states, in paragraph 7, that waste planning authorities should “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.</p>

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			<p>1. The assumption that residents in Hackbridge and Beddington are docile, easily manipulated and will stand idly by as people with no connection with the area and drag down its quality of life may have been true 6 years ago, it's not true now.</p> <p>2. There is no accurate data on vehicle movements now or in the future, there is no attempt to calculate the gross vehicle weights of HGV traffic.</p> <p>3. No recognition that until £13 million is spent upgrading Beddington Lane to take HGV volumes the road is unsuitable for current levels of traffic.</p> <p>4. No account of the effects of air pollution and traffic noise on residents.</p> <p>5. Unwillingness to recognise that officers are unwilling to oppose dirty waste plants because they know the vast sums of money these firms pay in business rates contribute towards their wages. (Viridor £1.8 million rates per year)</p> <p>6. Poor educational standards regarding environmental matters of many councillors.</p> <p>7. Unwillingness to accept that incineration has no part in a zero-carbon future.</p> <p>8. Councils lack of transparency and extreme secrecy over the prices paid to collect transport and dispose of waste.</p> <p>9. The political decision of siting waste plants in areas where residents are perceived as being poor and unwilling or unable to complain or protest is wrong.</p> <p>10. The marginalisation of Beddington and Hackbridge through poor, discriminatory or politically motivated planning decisions is also wrong.</p> <p>11. Even if the Viridor Incinerator became a fully functional Combined Heat and Power plant Incinerators can no longer be considered a low carbon technology in the UK.</p> <p>12. There is no mention of the 350,000 tonnes a year Suez Incinerator Fuel Plant in Beddington Lane and the likely 1.2 million tonnes of GVW traffic it will generate.</p> <p>See Appendix 4 for "The climate change impact of burning municipal waste in Scotland"</p>	<p>The draft SLWP proposes to safeguard existing sites only. These sites are either operational with an EA permit or have planning permission. HGV movements have been considered and are considered at the planning applications stage.</p> <p>The Council's do not recognise the figure of £13m. The Sutton Local Plan (2018) specifically identifies Beddington Lane as a site allocation for road improvements schemes. In 2019, Sutton Council secured £1.86m of TfL funding for the Beddington North TfL Major Scheme project on Beddington Lane. This was matched by Council funding of £1.7m, to provide a total budget of £3.56m for Beddington Lane improvements.</p> <p>https://www.sutton.gov.uk/info/200264/streets_roads_and_highways/1739/beddington_north_tfl_major_scheme</p> <p>In line with Policy SI 1 of the New London Plan and the relevant local planning policies, and any future planning application for new or intensified waste management</p>

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				<p>operations on any of the relevant safeguarded sites would need to be accompanied by an Air Quality Assessment demonstrating that the development is 'air quality neutral' and would not:</p> <ul style="list-style-type: none"> - lead to further deterioration of existing poor air quality - create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; or - create unacceptable risk of high levels of exposure to poor air quality. <p>In addition the Sustainability Appraisal, incorporating Strategic Environmental Assessment, includes assessment of air quality against the policies and proposals of the draft SLWP</p> <p>Furthermore, draft Policy WP5 'Protecting and Enhancing Amenity' places a requirement on waste applications to consider noise and vibrations from plants and traffic generated and traffic generation.</p>

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			<p>Email of 20 October 2020</p> <p>I have put in a FOI request to the Department of Environment to ask for the number of Waste permits for the Beddington Cluster. This has not yet been answered: what I want to make clear is that plan does not take into consideration the real situation in Beddington. 777 Demolition is being closed down and the site is likely to be acquired by Veolia. The Beddington incinerator is taking in clinical waste which it is not licensed to burn so unless its permit has altered this is going to another site. Around 80,000 tonnes of ash are coming from the Incinerator. As to the Suez incinerator fuel plant we have no real data for the actual gross vehicle weight of traffic it will generate.</p> <p>In short the plan does not say what's going on now and this makes it meaningless.</p>	<p>The Suez site on Beddington lane <u>does</u> form part of the draft SLWP, as it has planning permission for waste treatment, and as such it is identified as an existing safeguarded site under Site S12. The safeguarded site also identifies its licensed capacity of 350,000 tpa.</p> <p>Disagree. 777 is a proposed existing safeguarded site (Site S1), regardless of ownership. A change of ownership is speculation. Whilst waste sites may change ownership, it is the land that is safeguarded not the operator The ERF (Site S2) has planning permission, an EA permit and is operational. The Suez site (Site S12) is also a proposed existing safeguarded site (see response above) and has planning permission. All issues were considered when the planning application was being determined.</p> <p>The ERF has planning permission and an Environment Agency license. The emissions from the ERF were considered at the planning application</p>

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			<p>Email of 11 September 2020</p> <p>In the description of waste facilities in Beddington. There appears to be no estimates or hard data on the number of vehicles visiting the various waste facilities each year. There are no estimates for gross vehicle weights or the impact on air quality. I also noticed there are no figures for waste in and waste out.</p> <p>Also it looks like Hydrocleanse is not doing any business.</p>	<p>stage and the ERF is subject to ongoing monitoring by the Environment Agency. As such the draft SLWP proposes to safeguard the site for waste management for the plan period assessed.</p> <p>Assessment of vehicle movements takes place at the planning application stage.</p> <p>The Council understands that Hydrocleanse is still operating at present.</p>
22.	Con29: The Wimbledon Society	General comments	<p>The Wimbledon Society makes the following comments on this consultation.</p> <p>1) We regret that the recycling rate appears to be lowest in Merton at 37%: and are not yet convinced that there are sufficient proposals in place to get that figure substantially higher by the end of the plan period.</p> <p>2) We are concerned that many sites are likely to be adversely affected by the changes of use that come from the current policies by HMG on Permitted Development: this is not just on the sites themselves but on other industrial sites nearby which, if changed to residential via PD, would make the continued operation of the waste site (with its heavy traffic, noise and dust and poor air quality) very unsatisfactory, and lead to pressure for closure.</p> <p>3) It is not clear how the proper monitoring and regular publishing of the environmental conditions (noise, dust, traffic generation, CO2 production etc) is to be set apart from those who have the role of dealing with waste: a separation of the two is essential if the public interest is to be safeguarded.</p>	<p>Noted.</p> <p>1) Noted. The London Plan sets ambitious targets for recycling for municipal waste and the boroughs remain committed to working towards these by 2030. Safeguarded sites that contribute towards the recycling of waste, alongside policies on the circular economy will help towards meeting these targets (Policy WP7).</p> <p>2) Noted. The Councils agree that permitted development rights to convert industrial buildings to residential without planning permission raises a number of issues. However, the waste sites on Weir Road are</p>

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			<p>The Society is not yet convinced that the environmental impacts of the operation of the waste processing system are being comprehensively examined and independently reported on.</p> <p>4) There does not appear to be any clear indication of what financial and staffing resources are to be made available to run the Waste Plan, nor what the charges and fees are to be in both the public and private sectors. Charges and licences should be geared towards the progressive reduction in the production of waste, and the encouragement of recycling and re-use.</p> <p>5) There may be implications for Sustainability Policies in the Boroughs' Local Plans, where the current approach allows the demolition of perfectly good buildings (including modern ones) so that larger ones can be built for short term profit, and which is seen as a wasteful and unsustainable approach:</p> <p>6) There should be targets for the energy required to run the whole system, including vehicle collection and distribution, processing the waste, creation of energy from disposal.</p> <p>Given the importance of the Climate Emergency, the aim should be to progressively and significantly reduce the net energy required for waste processing over the whole plan period.</p>	<p>permitted and licensed so will continue to legitimately operate. Draft Policy WP8 sets out the approach for new development affecting waste sites, although it is recognised that this only applies to schemes requiring planning permission.</p> <p>3) Disagree. Draft Policy WP10 'Monitoring and Contingencies' and Appendix 1 sets out the Councils' approach to monitoring the implementation of the South London Waste Plan. The effectiveness of the objectives, policies and targets will be reported annually through the Authority Monitoring Report. The Environment Agency are responsible for monitoring sites that have an EA license/permits. Any conditions attached to planning permissions waste sites will be the responsibility of individual Councils to monitoring through its Planning Enforcements teams.</p> <p>4) The determination of planning applications for waste facilities and monitoring the implementation of Plan are</p>

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				<p>general functions of a Council Planning Department and will be financed by the budgets of those teams.</p> <p>5) Disagree. Draft Policy WP6 sets out the Waste Plan's approach to sustainable design and construction. In cases where demolition and rebuild is proposed, the draft Policy actively encourages construction waste to be managed on site.</p> <p>6) Draft Policy WP6 sets out the requirements for the overall environmental and sustainability performance of waste developments. In addition it requires proposals for waste facilities to minimise on-site carbon dioxide emissions in line with the 2019 ItP London Plan (Policy SI2).</p>
23.	Con32: Merton Conservative Group	General comments	Merton Conservatives understand that the Sustainability Appraisal has been undertaken to comply with government guidance. We accept that the South London Waste Plan is based on the draft London Plan and as such follows many of its policies regarding waste management strategy and recycling. However, we believe that there is room for significant improvement in these areas, and support a more ambitious target for recycling, especially for items which can be recycled and are currently sent to land fill.	Disagree. While the four SLWP boroughs support the ambitious targets for the recycling of municipal waste set out in the Mayor's Environment Strategy and the Intend to Publish London Plan 2019, this is not a target that can be delivered by a land-use plan prepared by a joint waste planning authority (although the safeguarded of

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			<p>Vehicle movements and emissions Trucks, lorries and other vehicle movements should be confined to specific roads designed for such vehicles (i.e. not local access roads) and, where possible, times to ensure the least disruption to residential communities (i.e. avoiding the main residential sleeping hours). We also support the use of electric or hydrogen vehicles where possible, one of the quickest ways to improve the air quality in Merton is for the present stock of trucks and lorries to be replaced with electric or hydrogen vehicles which do not damage the environment, and contribute to the current pollution crisis in Merton. No increase in capacity or vehicle frequency should be allowed at these larger waste sites unless air quality monitoring is in place and monitored on key access roads on the approach to the waste site. This plan needs to stress the duty more clearly upon waste operating companies to limit their vehicle emissions, noise nuisance and disturbance. These plans should be beefed up to include a specific duty on the relevant Local Waste Authorities (Councils) to clean up their bin lorries in line with public expectation.</p>	<p>waste sites does support this ambition). As the joint waste disposal authority, the South London Waste Partnership is responsible for waste collection and disposal within the four boroughs, and is therefore in a position to promote higher recycling rates.</p> <p>Noted. Policy WP5 on 'Protecting and Enhancing Amenity', the accompanying schedule on p34 of the draft plan and the relevant local planning policies within the four boroughs address the need to minimise the impact of waste-related HGV movements on residential areas and enable appropriate planning conditions to be set.</p> <p>While an increase in capacity or vehicle frequency is not anticipated for most of the safeguarded waste sites identified in the draft plan (typically where throughput is already high), any future planning application for an intensification of uses would need to demonstrate 'air quality neutrality' and be subject to range of planning obligations aimed at minimising adverse</p>
			Recycling	

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			<p>The present recycling target of 95% of construction and demolition waste to be recycled by 2020, seems hard to achieve and the SLWP does not set out how this will be measured and enforced. The target of 65% municipal waste to be recycled by 2030 does not seem to be ambitious enough, we support the greatest possible amount of recycling in Merton, and believe that the council can achieve a greater level of recycling of municipal waste in a shorter period of time.</p> <p>The target for no biodegradable or recyclable waste to be landfilled by 2026 is not ambitious enough. We would like to see this achieved within a shorter time scale and encourage the council to set out a pathway to achieve this.</p> <p>We feel that the targets for recycling cannot be met through incineration, and that the SLWP must instead aim for pure recycling rather than meeting targets through incineration.</p> <p>Waste management We support the target of being net self-sufficient in terms of waste generation and waste management for all types of waste and feel that this can be achieved before 2036. Currently Merton Council is aiming to decarbonise all buildings and services by 2030, so we feel that self-sufficiency could be achieved in the early 2030s.</p> <p>We support the creation of an additional household recycling centre (council tip) in the north of the borough to serve local residents.</p> <p>Local waste collection Since the Labour administration appointed Veolia waste collection in Merton has performed well below expectations, with large piles of waste filling the streets. Despite repeated calls for action and improvement by the Conservative Group performance still remains poor. If the borough and the wider SLWP is to meet its recycling and other targets, then the performance of Veolia must rapidly improve.</p> <p>Cross boundary waste disposal</p>	<p>environmental impacts on neighbouring land-uses.</p> <p>Disagree. Recycling targets cannot be enforced by a land-use plan such as the SLWP which is prepared by a joint waste planning authority. As noted above, the South London Waste Partnership (as the joint disposal authority) is responsible for waste collection and disposal within the four boroughs, and is therefore in a position to deliver higher recycling rates.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>We support highest possible levels of recycling in Merton and oppose the transfer of waste into the borough which could be recycled in its borough of origin. We think it is only acceptable for hazardous waste to be exported to other boroughs. Clearly this is an aspiration that will take time to achieve, but it will be necessary for other boroughs to manage their own waste, excluding hazardous waste, and not continue in sending part of this to Merton and the other SLWP boroughs.</p> <p>Apportionment We recognise that whilst Merton remains a member of the South London Waste Partnership the borough will remain part of the apportionment system, however as the SLWP boroughs will be taking in additional waste from other boroughs it is clear that the rest of London needs to increase the amount that is recycled and processed in other boroughs.</p>	<p>Noted. In line with the new London Plan apportionment to 2041, all waste planning authorities within London are required to achieve 'self-sufficiency' by allocating sufficient sites, identifying suitable areas, and identifying waste management facilities to provide the capacity to manage the apportioned tonnages of waste. This is expected to lead to an increase in the amount of waste that is recycled and processed in other boroughs.</p>
24.	Con33: Merton Liberal Democrat Group	Support	<p>We appreciate the work undertaken by colleagues to produce this comprehensive piece of work. We are broadly supportive of the overall aim of the draft South London Waste Plan 2021-2036 and the Preferred Option 1 with the inclusion of WP1 and WP10. However, we would like to raise the following areas of concern within WP6 and would appreciate them being addressed.</p> <p>[Response to draft Policy WP6 is set out below under 'WP6']</p>	<p>Noted</p>
25.	Con34: South West London Air Quality	Unsound – Not justified	<p>Introduction: We find that much of the SLWP strategy revolves around the continued use of the Beddington incinerator. Our group has several objections on the grounds of its health impact, climate impact and the avoidable burning of recyclables.</p>	<p>Disagree. The ERF has planning permission and an Environment agency license.</p>

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	Monitoring Group		<p>Other countries are taking the lead in promoting a circular economy, referred to in the SLWP strategy but here we seem to have disappointing plans. Denmark in particular is moving away from the linear waste stream to a circular model with a much greater emphasis on recycling and reusing waste. It has also barred the building of new incinerators which it mainly uses now to support existing long standing contracts. Much of the feedstock is imported from abroad: https://www.politico.eu/article/denmark-devilish-waste-trash-energy-incineration-recycling-dilemma/</p> <p>Health Effects of Incineration: Just yesterday a report was published showing that fifteen deaths a year are associated with five incinerators studied in London. One of the five was the Beddington incinerator, which suggests that three of the fifteen London deaths are linked to the Beddington incinerator. Other health effects were cited such as cardiac and pulmonary illnesses. The Mayor supports the findings of the report and has already called for the banning of any new incineration in the capital: https://www.letsrecycle.com/news/latest-news/efw-plants-cause-deaths-of-15-londoners-per-year</p> <p>The Tango study of many Japanese incinerators in 2004 found an excess of infant mortality near the plants: Risk of adverse reproductive outcomes associated with proximity to municipal solid waste incinerators with high dioxin emission levels in Japan. Tango, Journal of Epidemiology 2004</p> <p>The Trieste study in Italy found an excess of lung cancers near incinerators in the city: https://www.google.com/url?sa=t&source=web&rct=j&url=http://www.hia21.eu/dwnld/20131216_Health%2520effects%2520of%2520exposure%2520to%2520waste%2520incinerator%2520emissions.pdf&ved=2ahUKEwiinMrFlcjsAhUyVBUIHQMJAIMQFjACegQIDxAF&usq=AOvVaw2ZjDmtlR3h3Vr0lz0KwEFe</p>	<p>The emissions from the ERF were considered at the planning application stage.</p> <p>The ERF is subject to ongoing monitoring by the Environment Agency.</p> <p>The National Planning Policy for Waste states, in paragraph 7, that waste planning authorities should “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;”</p>

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			<p>The British Society for Ecological Medicine 'Ecomed study' found that ultrafine particulates routinely emitted from waste incinerators were responsible for wide range of health impacts: https://www.google.com/url?sa=t&source=web&rct=j&url=http://www.hia21.eu/dwnld/20131216_Health%2520effects%2520of%2520exposure%2520to%2520waste%2520incinerator%2520emissions.pdf&ved=2ahUKEwiinMrFlcjsAhUyVBUIHQMjAIMQFjACegQIDxAF&usq=AOvVaw2ZjDmtlR3h3Vr0lz0KwEFe</p> <p>Toxicologist Professor Vyvyan Howard gave evidence to the 2009 Ringaskiddy incinerator inquiry showing that these ultrafine particles carry a variety of known toxins eg dioxins, PCBs and metals.</p> <p>Some studies have shown a correlation between air pollution such as emitted from incinerators and Alzheimer's Disease and Parkinsonism.</p> <p>The Elliott study, backed by the UK government that showed no health effects from incineration only did so by increasing the size of the population rings studied and removing all the liver cancer cases. The initial findings had indeed shown a link to cancer incidence.</p> <p>The Kelly study published a year ago also seems flawed. It showed a weak correlation with infant genetic malformations but no other health impacts. However independent researcher Michael Ryan studied the twenty two incinerators in the study and requested Office of National Statistics figures for the local populations. He found excess infant mortality in the majority of the communities near the studied incinerators.</p> <p>So there is an abundance of evidence showing serious health effects from incinerators. What reports that deny this link seem to be flawed.</p> <p>Public Health England have suggested that well run incinerators are likely to have just a marginal effect on health but PHE seems to rely on the questionable government funded studies.</p>	

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			<p>In any case the Beddington incinerator cannot claim to be well run with monitoring reports showing pollution excesses most months since its start up.</p> <p>Also they were responsible for a nine hour fire in July last year which took twenty five fire fighters and four fire engines to control. The 50 to 100 tonnes of mixed commercial waste in the blaze contained mattresses which are laced with fire prevention chemicals containing arsenic.</p> <p>Other toxins which are emitted from incinerators include Nitrogen Dioxide and other NOX gases, Sulphur Dioxide, Ammonia, Carbon Monoxide, Furans and Dioxins plus heavy metals cyanide, chromium, cobalt and lead.</p> <p>Increasing recycling rates: It has been shown in various studies that incineration has an adverse effect on recycling figures. Denmark has been making big efforts to boost its circular economy (see above link) and up its recycling. In this country Oxford has shown a lead in collecting recyclable materials. (See attached article by UK Without Incineration)</p> <p>Sutton has managed to increase recycling from a sad 35 percent to a better 50 percent. But still the brown kerbside bins attract much recyclable waste which is destined for the incinerator. Households may find difficulty in disposing of items such as batteries, electronics, old clothing and fabrics, metal and wood unless they use the brown bins.</p> <p>We recommend that extra kerbside bins are provided which would take these items separately to prevent them going into the furnace and to keep them in circulation. The Kimpton Park centre has separate collection points for most of these recyclables so this should be mirrored in kerbside collections.</p> <p>The number of waste collection depots should also be increased. Not everyone can make the journey to Kimpton Park, in the case of Sutton, to recycle their unwanted but reusable or recyclable items. So extra depots</p>	<p>Noted – No action.</p> <p>While the four SLWP boroughs support the ambitious targets for the recycling of municipal waste set out in the Mayor’s Environment Strategy and the Intend to Publish London Plan 2019 (65% by 2030), and safeguarded sites that contribute towards the recycling of waste, alongside policies on the circular economy, will help create conditions for meeting these targets, this is not an target that can be delivered by a land-use plan prepared by a joint waste planning authority. As the joint waste disposal authority, the South London Waste Partnership is responsible for waste collection and disposal within the four boroughs, and is therefore in a</p>

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			<p>could be made available at public sites around the boroughs eg at all car parks and schools.</p> <p>Some plastic is currently not recyclable and so is sent for incineration. In fact fifty percent of the incinerator feedstock is plastic which contributes greatly to the toxicity of the plume and therefore impacts on the health of the community. It also adds greatly to the Carbon Dioxide emissions from the incinerator thus adding to greenhouse gases produced by the boroughs. Plastic is derived from fossil fuels.</p> <p>However plastic is an inert material when it is not burnt. So it should not be incinerated and instead should be landfilled and 'stored' in this way until a technology exists which can enable the plastic to be recycled or reused. As it is inert it will not produce greenhouse gases from this storage unlike organic matter which does produce methane.</p> <p>We applaud the remarks of the new Chair of the South London Waste Partnership who, at the last committee meeting, agreed that plastic should not be burnt.</p> <p>Climate Change: The Beddington incinerator is Sutton's single greatest emitter of greenhouse gases, notably carbon dioxide. It seems incompatible with Sutton's agreement last year to become net zero carbon by 2030 to continue burning waste in the incinerator. So the contract with Viridor should be brought to an early end.</p> <p>Some of the above recommendations can be a guideline towards greater recycling and moving towards a circular strategy.</p> <p>Research by the vast majority of climate scientists including Sir David Attenborough, shows we must act quickly to bring down our greenhouse emissions to prevent catastrophic rising sea levels, mass starvation, mass movement of populations and huge loss of wildlife habitat.</p>	<p>position to promote higher recycling rates.</p>

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			<p>Unfortunately the SLWP strategy does not reflect this sense of urgency. We suggest that South London must up its game to address the waste policies which could either help or hinder this crisis.</p> <p>Summary: The continued use of the Beddington incinerator is having an adverse effect in several key areas. The health of our community should be central to council policy as should climate change and achieving higher recycling rates. Much of the strategy should be geared to eliminating the use of the incinerator as quickly as possible.</p> <p>See Appendix 5 for leaflet on how councils can increase their recycling rates</p>	
26.	Con37: Environment Agency	General Comments / Factual Updates	<p>Thank you for consulting the Environment Agency. We welcome the draft plan and feel it could be strengthened further. We have provided some guidance and feedback below.</p> <p>In the Duty to Co-operate Statement 2 it is stated the final plan would be updated to include key national plans and strategies. "The Councils agree to update paragraph 2.8 with relevant national strategies.", "Councils to add circular economy diagram to the final document." The current plan does not include these strategies.</p> <ul style="list-style-type: none"> • The 25 Year Environment Plan: This sets out a policy framework for the production stage, giving producers a clear roadmap of how we will double resource productivity and achieve zero avoidable waste by 2050. Now we have left the EU, the UK's overarching 25 Year Environment Plan will continue to set our direction • The Resources and Waste Strategy (RWS) demonstrates our ambition to move to a more circular economy which will see us keeping resources in use as long as possible, extracting maximum value from them and promoting resource efficiency. The transposing SI also puts into law our commitment in the RWS to recycle 65% of municipal waste and to have no more than 10% of municipal waste going to landfill by 2035 • Independent review into serious and organised crime in the waste sector (November 2018) 	<p>Noted.</p> <p>Agree. The Councils will add reference to these document to the Waste Plan. The first two documents are referenced in the SA and it also identifies crime in the waste sector as an issue.</p>

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			<p>The Waste (Circular Economy) (Amendment) Regulations 2020 have been published and came into force on 1 October 2020. This new Statutory Instrument will bring the majority of the requirements of the Circular Economy Package (CEP) into force by amending a number of key pieces of primary and secondary waste legislation. These include the Packaging Regulations, Hazardous Waste Regulations, the Waste Regulations 2011 and the Environmental Permitting Regulations.</p>	Noted.
			<p>Further legislative changes are expected towards the end of the year. These will involve implementing amendments to the Waste Framework Directive, in particular Articles 5 and 6 on the definition of waste.</p>	Noted.
			<p>The SLWP plan may need updating depending on the impacts of these legislative changes. We will also keep you updated on any changes to the Environmental Permitting Regulations.</p>	Noted.
			<p>The plan also requires flexibility given the ongoing issues from the Coronavirus Pandemic and impacts on waste management and changes in waste values. For example, due to increased home working, some areas are dealing with rising volumes of household waste and reduced commercial waste. It's important the plan can track and adapt to this and other ongoing changes and the impacts this might have on the type and number of waste sites required. This may also impact on waste movements inside and outside the plan area.</p>	<p>Noted. Draft Policy WP10 'Monitoring and Contingencies' and Appendix 1 sets out the Councils' approach to monitoring the implementation of the South London Waste Plan. The effectiveness of the objectives, policies and targets will be reported annually through the Authority Monitoring Report.</p>
			<p>We recommend the supporting Technical Report is regularly reviewed to understand waste volumes and movements across the plan area. We are</p>	<p>The AMR will include the latest available information on throughput that is currently set out in the Technical Report.</p> <p>Noted. The Councils will consider adding the EA Waste</p>

Rep No	Con No	Type of Representation	Representation	Comment
			able to share data and information to help inform regular reviews. We recommend adding the EA Waste Permit reference number and operator name to the South London Waste Plan site list section and we can share issues with poor performing and any illegal waste sites.	Permit reference number to individual sites.
27.	Con37: Environment Agency	Unsound – Not justified	<p>High quality and well operated waste management sites We welcome the policy goals for all waste management sites to be well designed, well operated and supported with the right infrastructure to prevent issues to local communities.</p> <p>We are keen to continue working you to ensure the existing and renewed waste management sites are operating in modern infrastructure. It is unclear how the decision for “no new waste sites” over the lifetime of the plan has been reached and a more flexible approach might be required. New waste sites could replace poor performing sites and result in higher environmental standards.</p> <p>New well planned and designed waste management sites would deliver higher infrastructure standards than existing older and constrained waste sites meaning less issues from noise, dust, poor drainage and high fire risk.</p> <p>It is unclear how the plan objective for no new waste sites will fit with environmental permitting regulations as we cannot state there will be no new waste permits issued across the plan area if operators meet the permit criteria, competency levels and follow the latest good practice. https://www.gov.uk/government/collections/environmental-permit-application-forms-for-a-standard-permit-installations-mining-waste-or-waste-operation</p>	<p>Noted.</p> <p>Noted. The evidence base supporting the economic policies in the 2020 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 South London is already providing 13% more waste management capacity than waste arising in the south London area, the plan is trying to balance the requirement to meet the London Plan targets with providing enough land for the high demand for non-waste industrial uses.</p> <p>The Councils should not be required to offer sites to other</p>

Rep No	Con No	Type of Representation	Representation	Comment
				London boroughs when they have such a pressing need for industrial land for other industrial uses and already planning for 13% than their collective arisings.
28.	Con38: Surrey County Council	Support	<p>Thank you for consulting Surrey County Council. We have the following comments to make regarding the above consultation.</p> <p>CD&E waste We welcome the acknowledgements in the Submission South London Waste Plan (SLWP) that waste movements are a strategic issue and that the SLWP area exports a considerable amount of CD&E waste to Surrey. We welcome the aim for the SWLP to reduce the amount of Construction and Demolition Waste going to landfills in Surrey (para. 3.27) and cooperation has taken place on this issue, recorded in the Statement of Common Ground between Surrey and the South London Waste Plan Authorities (May 2020).</p> <p>Surrey notes that the Excavation element of the CD&E waste stream does not count within the net self-sufficiency target within the SLWP. The SLWP contains little detail on arisings of Excavation waste, though it is acknowledged that paragraphs 5.14 to 5.16 of the SLWP set out how this element of the CD&E waste stream will be planned for and indicates that South London authorities will continue to rely on mineral workings in the South East of England, which make use of excavation waste to restore those mineral workings (SLWP para. 5.16). Surrey County Council welcome this approach. Surrey County Council consider that additional supporting evidence, for example quantification of the Excavation waste forecast to arise in the SLWP area over the plan period, could be beneficial to justify the approach to planning for Excavation waste in the SLWP and to ensure that this approach will be effective.</p>	<p>Noted.</p> <p>Noted. Table 45 of the Technical Report sets out figures for construction, demolition and excavation waste. This notes that the largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities within the Surrey Waste Planning Authority. The amount of evacuation waste arisings each year is highly influenced in London by the strength or weakness of London's housebuilding and commercial property development market. As noted</p>

Rep No	Con No	Type of Representation	Representation	Comment
				by your representation cooperation has taken place on this issue and is recorded in the Statement of Common Ground.
29.	Con38: Surrey County Council	General comments	<p>Capacity gap The waste management capacity for each waste stream is displayed for the year 2019 in the SLWP. However, the capacity is assumed to be the same at the end of the plan period.</p> <p>In the interests of clarity and justification, should it be made clear that the capacity shown accounts for planned site closures (time limited permissions) over the plan period? If it is assumed that capacity will remain the same at the end of the plan period due an absence of planned site closures and due to safeguarding of existing capacity, should this be made clear?</p>	Noted. The Council's consider Figure 13 is clearly explained in para 5.8 of the draft Plan. As set out in para 5.8 and Figure 13 the boroughs have sufficient capacity in existing facilities in meet the forecast in 2036, so existing sites are to be safeguarded. It is also makes clear that some sites, as set out in the Deliverability Report some sites have opportunities for intensification. As such, where appropriate and subject to relevant policies, intensification will also add capacity over the lifetime of the Plan. The potential intensification of sites gives the Plan some flexibility. Capacity across the four boroughs will be monitoring through the Authority Monitoring Report on an annual basis.
30.	Con39: Resident EG	Unsound – Not positively prepared, Not Justified.	Last year Croydon Council declared a Climate Emergency and has since engaged the National Economic Foundation and local representatives to form the Croydon Council Climate Commission with a view to reducing carbon emissions. Incinerating waste is not in keeping with these plans. The emissions from the incinerator are also bad for air quality which negatively affects public health. Incinerating waste puts the earth's finite resources beyond use.	Disagree. The Beddington ERF has planning permission and an Environment agency license. The emissions associated with the ERF were considered at the planning application stage.

Rep No	Con No	Type of Representation	Representation	Comment
			<p>Recycling of all kinds should be maximised. Packaging should be reduced. Repair, reuse and a reduction in consumption should be encouraged.</p>	<p>Furthermore, the ERF is subject to ongoing monitoring by the Environment Agency.</p> <p>It is important to note that the National Planning Policy for Waste states, in paragraph 7, that waste planning authorities should “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;”</p> <p>Noted.</p> <p>While the four SLWP boroughs support the ambitious targets for the recycling of municipal waste set out in the Mayor’s Environment Strategy and the Intend to Publish London Plan 2019 (65% by 2030), and safeguarded sites that contribute towards the recycling of waste, alongside policies on the circular economy, will help create conditions for meeting these targets, this is not an target that can be delivered by</p>

Rep No	Con No	Type of Representation	Representation	Comment
				a land-use plan prepared by a joint waste planning authority. As the joint waste disposal authority, the South London Waste Partnership is responsible for waste collection and disposal within the four boroughs, and is therefore in a position to promote higher recycling rates.
31.	Con40: SUEZ	General	<p>SUEZ (Formerly SITA UK) is a recycling and resource management company which serves over 12 million people and handles over 10 million tonnes of domestic, commercial and industrial waste in the UK each year.</p> <p>SUEZ provides services for over 30,000 public and private sector customers and operates a network of facilities including: recycling, composting, refuse derived fuel production, solid recovered fuel production, wood processing, energy-from-waste and landfill. SUEZ was established in 1988, employs over 5,000 staff and has an annual turnover in excess of £800 million.</p> <p>The purpose of the company is to protect the environment by putting waste to good use. SUEZ currently operates two facilities in the SLWP area, Benedict Wharf in Mitcham (no longer proposed for safeguarding) and Morden Transfer Station (Safeguarded Site M11). In addition, SUEZ is the owner of Beddington Resource Recovery Facility (BRRF) (Safeguarded Site S12) that has planning permission but is not yet constructed.</p>	Noted.
32.	Con41: Resident PF	General	I attach the signed Response Form, but draw to your attention that my comment relates to an apparent disconnect between the intensification possibility noted within Appendix 2 and the Site Descriptions laid out in the Draft Submission and that noted within Part B, pp. 155-170 of the Sustainability Appraisal. In this regard, I draw your attention to:	(Site C5A) Disagree. At the time of preparation of the draft SLWP there were no current plans by the South London Waste Partnership to intensify

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			<ul style="list-style-type: none"> • C5A Factory Lane Waste Transfer; • C13 Solo Wood Factory Lane. (Please note the site operator's request for this portion to be separated out and their belief in a lack of possibility for intensification; and • M17 UK & European. <p>It was unclear to me why:</p> <ul style="list-style-type: none"> • The Site Descriptions implied a greater number of sites that had the potential for intensification, but this was not reflected in Appendix 2. • S1, 777 Recycling Centre was listed as not having the potential for intensification when the Conclusions in the report by Anthesis June 2019 held otherwise. <p>I presume this relates to earlier representations received?</p>	<p>operations at this, the site description on p46 of the draft plan, Appendix 2 and the SA Report (p155) all correctly identify that there is some potential for intensification and for co-locating other waste uses on this site.</p> <p>(Site C13) Agree – changes proposed. While the site description on p55 of the draft plan and the SA Report (p158) correctly identify that there is little or no potential for intensification on this site, the far right column in Appendix 2 indicates otherwise. Amend Appendix 2 to delete the word 'Yes' in the right hand column against Site C13.</p> <p>(Site M17) Disagree – no action. The site description on p77 of the draft plan, Appendix 2 and the SA Report (p165) all correctly identify that there is little or no potential for intensification on this site.</p> <p>Agree – changes proposed. Amend right column of Appendix 2 to ensure consistency with the corresponding site descriptions by indicating that the relevant</p>

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				<p>safeguarded sites have potential for intensification.</p> <p>(Site S1) Noted. The conclusions of the Anthesis Report regarding the potential for this site to intensify have been reconsidered in the light of representations received to the Issues and Options consultation and further investigations. During the preparation of the Technical Report the owners of 777 suggested that there was potential for intensification of the site. However, this position has since been updated between the Issues and Preferred Options consultation and the Draft Plan, where the owners of 777 no longer support safeguarding of the site for waste.</p>
33.	Con41: Resident PF	General	On a final note, I note the SA said that the period of consultation was 8 weeks, but you have in fact only accorded 7 weeks.	<p>Agree.</p> <p>Amend SA Report to indicate a 7 week period of consultation. No late representations were received so all representations of the SA appear in this schedule.</p>
34.	Con42: Viridor	Unsound – Not positively prepared, Not Justified.	The emerging plan is to cover the period 2021 to 2036. The area of the recycling centre should be included as the current permission for this area is to the end of 2022.	<p>Disagree. Responses were provided to all representations</p>

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			<p>The Submission Version is based on the 2018 Anthesis Study of the boroughs' existing capacity and likely future capacity. We submitted comments to the study as part of the Issues and Options stage. However, these comments have not been responded to in the Issues and Preferred Options Representations Document dated March 2020. As such, we reiterate our comments below:</p> <p>ANTHESIS – SOUTH LONDON WASTE TECHNICAL PAPER</p> <p>In respect of the Beddington Recycling Centre part of the site, Paragraph 6.2.4.1 recognises that its proximity to the Viridor ERF makes it site suitable for a complementary facility. However, due to the designations of the site, Metropolitan Open Land, Metropolitan Green Chain, and the commitment contained in the S016 Agreement, requiring the site is to be restored as part of the Wandle Valley Regional Park, the site has not been considered further.</p> <p>Parts of this site may still be appropriate for accommodating some of the ERF needs when it is not operational, particularly due to its proximity. This site should not be dismissed, but carefully considered on the context of the ERF and its needs. It is recognised on page 169 that the site is distant from residential areas. In addition, it has operated for a number of years without complaints and the retention of all or part of the Recycling Centre at the site would mean sustainable use of existing infrastructure.</p> <p>In addition, the Recycling Centre provides a facility to the SLWP, under contract until 2022, to receive bulky goods and recyclables collected from within the area. This facility should be safeguarded until a procurement process by the SLWP has been concluded, and an alternative site for receiving and processing this waste stream from the SLWP has been delivered.</p> <p>Para 171 indicates that the Recycling Centre is to be restored to a county park. This is incorrect. The site is privately owned and is required to be restored in accordance with an approved Restoration Management Plan, which includes public access to parts of the site. It is misleading to refer to the entire site as a county park.</p>	<p>on the Issues and Preferred Options document and are published in the examination library.</p> <p>As stated the site is located within Metropolitan Open Land, Metropolitan Green Chain, and Site of Interest for Nature Conservation. Furthermore the site <u>does</u> fall within the areas designated as the part of the 'Wandle Valley Regional Park', as set out on Sutton's adopted Policies Map (Please see Local Plan Appendices Map 5.27 on page 117).</p> <p>MOL in this locality was discussed and debated extensively during the Sutton Local Plan EiP in 2017. This resulted in the piece of land immediately to the east of the ERF being released to meet industrial need. The rest of the land, including the land subject to this representation, remains in MOL.</p> <p>As stated the recycling centre is to be restored in accordance with the approved Restoration Management Plan and, as clarified above, the land falls</p>

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			<p>The strategy of intensifying existing waste sites and developing vacant/non-operational sites to meet apportionment target places a significant weight on the assumption that 777 Recycling Centre at 154a Beddington Lane maximises its throughput for household, industrial and commercial wastes and that 156 Beddington Lane is released for other uses. It is also assumed that Therapia Lane, UK And European Construction / Ranns and the non-operational Satefy Kleen site contribute towards construction, demolition and excavation waste. We would question the soundness of a plan based on these assumptions unless their deliverability in the plan period can.</p>	<p>within areas designated as the Wandle Valley Regional Park, as set out on Sutton adopted Policies Map. The Council expects this restoration to be completed in accordance with the restoration plan.</p> <p>Consultation responses to the Issues and Preferred Options document revealed more capacity than originally thought. That is reflected in the figures provided in the draft SLWP.</p>
35.	Con43: Resident MW	General	<p>Given the enormous impact of the SLWP planning policies the consultation could have been better publicised.</p>	<p>Noted. As set out in the Statement of Consultation on the Regulation 19 document the consultation on the draft Plan was carried out in accordance with each of the boroughs Statement of Community Involvement (SCI).</p>
36.	Con43: Resident MW	Unsound – Not consistent with national policy	<p>I only want to note that this plan covers the period up to 2036, but neglects plan for the current climate and ecological emergency.</p> <p>It doesn't have intermediate targets to reduce waste and emissions in line with the Sutton Council Environmental Strategy.</p> <p>In order to meet national government, London wide and local targets there needs to be a plan the target emissions and waste reductions and to restore biodiversity.</p> <p>Thanks for your attention.</p>	<p>Disagree – Issue 5 in the draft Plan highlights climate change as a key issue and there are a number of policies in the Plan that contribute towards addressing climate change.</p> <p>Firstly, it support the 2019 Mayor's Environment Strategy and the London Plan ItP proposals to move towards a circular economy and also recognises the regional targets</p>

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				<p>for reducing waste and improving recycling that are set out in the London Plan ItP (page 5 of the draft SLWP).</p> <p>The draft SLWP reduces the amount of waste going to landfill, makes major waste developments zero carbon, make minor waste developments as close to zero carbon as possible and finally provide opportunities for the circular economy to expand. This task has been achieved through draft policies WP3, WP6 and WP7. Furthermore, draft Policy WP4 encourages more reuse and recycling on waste transfer stations, which will help reduce waste.</p> <p>Draft Policy WP5 includes requirements for new waste development application to submit, where required, energy assessments, including an assessment of CO2 emissions, biodiversity assessment, air quality assessments, circular economy statement, sustainability statement and environmental impact assessment and Habitats Regulations Assessments.</p>

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				In addition to the draft Plan, Sutton Council's approach to reducing waste is set out in the Waste Minimisation Strategy 2019-2026 and its Reduction and Recycling Plan were adopted in December 2019.
37.	Con44: Historic England	Unsound – Not consistent with national policy	<p>Thank you for consulting Historic England regarding the above draft Report, covering the London boroughs of Croydon, Kingston, Merton and Sutton. As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is taken into account at all stages and levels of the planning process.</p> <p>We note the accompanying Sustainability Appraisal and consider that it provides an appropriate framework for assessing the likely impacts of the Plan, including those on the historic environment. However, we note that the majority of comments made by Historic England during the previous public consultation on draft Plan have not been accepted. As a result, we consider that the draft Plan itself does not reflect the broad approach taken in the Sustainability Appraisal to potential impacts. As indicated in our previous response to the Issues & Options consultation (a copy of which is attached elsewhere to this letter), we consider that as a minimum there should be an unambiguous policy that will ensure that the historic environment is conserved and enhanced as required by paragraphs 16 and 20 of the National Planning Policy Framework (NPPF). Further, while we welcome the references to conservation areas within the draft Plan, we consider that the issue of setting and its contribution to heritage significance is not properly reflected in the consultation draft.</p>	<p>Noted.</p> <p>Disagree. The draft SLWP now includes, under draft Policy WP5, the submission of an assessment of the impact of the proposed development on the built and historic environment (where required). Furthermore, Heritage assets are covered in the "Issues to Consider" section for the sites tailored to the site's relationship with a historic asset</p> <p>The Councils do not consider that a specific policy in the draft SLWP is required. Individual borough local plans, and emerging local plans, all include unambiguous policies that ensure the historic environment is conserved and enhanced, as required by para</p>

Rep No	Con No	Type of Representation	Representation	Comment
				16 and 20 of the NPPF. The draft Plan makes clear (para 1.3) that borough local plans (along with the London Plan and any SPDs) also form part of the development plan and will be used in the decision making process for waste development applications. Therefore, the Council's do not consider it necessary to repeat policies that already exist elsewhere within the 'development plan'.
38.	Con44: Historic England	General Point	<p>General point: given the above, irrespective of whether a site is located in an APA or not, Historic England would need to be consulted in respect of non-designated archaeology in the following situations cut down from the list contained within the Planning Charter cited above (Charter of the Greater London Archaeological Service). GLAAS should be consulted</p> <ul style="list-style-type: none"> • All major planning application over 0.5 hectares whether or not in an APA • All Environmental Impact Assessment Scoping requests and Environmental Statements • Any application supported by an archaeological desk-based assessment • Minor planning application in any APA Tiers 1 to 3) • Submission of detail in relation to archaeological conditions • Appeals on applications for which an archaeological issue has previously been identified <p>Please note that this opinion is based on the information provided by you and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA, have adverse effects on the environment. I trust that these comments are helpful. Please</p>	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
			do not hesitate to contact me should you require any further information or would like to discuss the above.	
Paragraph 3.8				
39.	Con30: Resident DT	Unsound – Not consistent with national policy	<p>I would urge consideration regarding the plan on a further specific area: Para 3.8 page 'in the future, this is due to be managed at Beddington' <i>It is not consistent with national policy</i> – and will hinder the delivery of sustainable development if permits are granted that increases the volume of materials that can be managed and burnt at Beddington ERF. Further to this it is not <i>justified</i> as the additional waste is not generated within SLWP.</p> <p>Materials not generated in SLWP should not be managed at the Beddington ERF nor at any future sorting site.</p>	Noted. The Beddington ERF (Site S2) is expected to manage 275,000tpa and has a licensed capacity of 302,500tpa. These figures were in the public domain at the time of the granting of the planning permission. Therefore, this paragraph is not stating anything new. Furthermore, the exported waste referred to in para 3.8 <u>is</u> waste generated within the SLWP area.
Key Issue 3 – Scarcity of Land				
40.	Con42: Viridor	Unsound – Not positively prepared	<p>Paragraph 3.22 of the Submission Version recognises that the waste management solutions have been delivered in accordance with the sites and areas set out in the 2012 adopted SLWP. One of the key facilities delivered in accordance with the existing waste plan is the Beddington ERF. This paragraph further states that 'modern facilities are more efficient in their layout, processing capability and landtake.' Although this can be true, modern facilities also require management and maintenance due to their mechanical processes which adds a layer of complexity when compared to waste management by landfill.</p> <p>This Submission Version does not address the matter of planning for management and maintenance of modern mechanical waste processes. We therefore question the soundness of emerging Plan. This issue is being overlooked as the Plan is focused only on facilities addressing the</p>	<p>Noted.</p> <p>The Councils consider there is sufficient capacity for waste to be received at another facility if downtime is required</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>apportionment target and does not consider the temporary unavailability of such facilities. The Plan is therefore lacking flexibility.</p> <p>During the management and maintenance of a modern facility, the needs are often twofold. Firstly, areas are needed for maintenance/set down (I.e. storage of replacement pieces, scaffolding, works area), welfare provision and parking for personnel involved. Secondly, alternative areas to accept waste intended for the facility out of use. Emerging Policy documents need to recognise and facilitate this need of modern waste facilities, which overall are more efficient in their layout, processing capability and land-take.</p>	
Key Issue 4 – Waste Transfer Facilities				
41.	Con42: Viridor	Unsound – Not positively prepared	<p>Access to Transfer Facilities are crucial during periods that facilities such as the Beddington ERF are not available. Although this need is temporary, it is re-occurring and therefore there ought to be sufficient flexibility in the Plan for this to be addressed to ensure the soundness of the Plan. The requirement needs to be met on sites which are either in the waste operators' or the Local Authorities control for deliverability to be met.</p>	Noted.
Key Issue 5 – Climate Change, the End of Landfill and the Circular Economy				
42.	Con42: Viridor	Unsound – Not positively prepared	<p>We support the proposal not to safeguard the Beddington Farmlands Landfill site, as it closed to waste at the end of 2019. Viridor is now committed to restoring the Farmlands site into a network of high-quality habitats. However, in order to deliver approved restoration profile, it is important to recognise that inert material will be brought to the site until 2023. Paragraph 3.28 states that 'While it is recognised that waste facilities will continue to generate CO2 emissions, the 2019 ItP London Plan requires major development, such as new waste facilities, to be net zero carbon and this is a key issue for the South London Waste Plan.'</p> <p>As part of the 25-year Residual Waste contract between Viridor and the South London Waste Partnership to manage non-recyclable waste at the Beddington ERF, A Carbon Management Plan (CMP), which relates to the reduction of carbon footprint of the Beddington ERF and any associated transportation within Viridor's control is being developed. A quarterly Carbon Steering Group, has also been established in accordance with the contract and the group will assess and develop strategies to form part of the ongoing Carbon Management Plan review process. This Group brings</p>	<p>Noted. However, As stated the site is located within Metropolitan Open Land, Metropolitan Green Chain, and Site of Interest for Nature Conservation. Furthermore the site <u>does</u> fall within the areas designated as the part of the 'Wandle Valley Regional Park', as set out on Sutton's adopted Policies Map (Please see Local Plan Appendices Map 5.27 on page 117).</p> <p>MOL in this locality was discussed and debated extensively during the Sutton Local Plan EiP in 2017. This</p>

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			<p>together Viridor and the South London Waste Partnership Boroughs to develop and deliver projects to actively reduce the impact of the Beddington ERF on the environment annually.</p> <p>Viridor is supporting the four Boroughs of the South London Waste Partnership with their climate change adaption goals. It is noted that Croydon has set a Net Zero carbon goal of 2030, Kingston in 2038, Merton in 2050 and the London Borough of Sutton by 2030. With the Carbon Management Plan in its early phases, a number of short, medium and long-term objectives have been identified as core ways to reduce the net carbon emissions of the ERF, and by association the local authorities which it serves in the South London Waste Plan area.</p> <p>It is noted that two of these opportunities, with the potential to substantially reduce the carbon impact of the ERF and its associated waste, would be underpinned by additional infrastructure immediately near to, or contained within the Beddington ERF site. This could include a pre-sortation facility to remove anthropogenic fractions of waste from the incoming material stream or a direct carbon capture, storage or utilisation facility. Each of these solutions would likely be considered in future years of the Plan and would benefit greatly from being integrated into the Beddington ERF site.</p> <p>As such it is recommended that extent of safeguarding of Site S2 enable the Beddington ERF to utilise this opportunity in future years of the plan when technology enables deployment at a cost- effective level.</p> <p>It is foreseeable that there will be a need for infrastructure associated with carbon reduction. Although this infrastructure would not be linked to managing waste capacity, it will form a part of modern future-fit waste management facility. It would be suggested that part the area currently used as a Waste Transfer Station for South London Waste Partnership recyclable materials until 2022 is safeguarded as a location where future development could support the Beddington ERF and South London Waste Partnership to reduce its direct carbon emissions. The emerging policies within the Plan need to be positively prepared to meet such needs. This is not currently the case.</p>	<p>resulted in the piece of land immediately to the east being released to meet industrial need. The rest of the land, including the land subject to this representation, remains in MOL.</p> <p>As stated the recycling centre is to be restored in accordance with the approved Restoration Management Plan and, as clarified above, the land falls within areas designated as the Wandle Valley Regional Park, as set out on Sutton adopted Policies Map. The Council expects this restoration to be completed in accordance with the restoration plan.</p>

Rep No	Con No	Type of Representation	Representation	Comment
Vision and Objectives				
43.	Con42: Viridor	Suggestion	The vision and objectives are focussed on meeting the waste capacity need. An objective should be introduced for the Council to ensure Waste Management Sites that are meeting capacity requirements are capable of meeting these needs all the time, not only when the facility is operational.	Disagree. The vision and objectives provide a high-level strategic overview of the South London Waste Plan. Objectives 1 to 3 make clear that the draft Plan seeks to meet the targets and need over the Plan period as a whole.
Policy WP1: Strategic Approach to Household and Commercial and Industrial Waste				
44.	Con1: The Mayor of London	Non-Conformity	<p>New waste sites</p> <p>Policy WP1 (d) prevents new waste sites from coming forward and has not been amended to reflect the concerns raised in the Mayor's earlier response to the SLWP I&PO consultation.</p> <p>New waste sites may enable the management of waste further up the waste hierarchy as supported by London Plan policies SI8 and SI9. Preventing new waste sites coming forward is likely to stifle waste management innovation in the SLWP area and negatively impact London's transition to a circular economy.</p> <p>Consequently, the policy as currently written would negatively compound the effects of draft Policy WP3(c); if compensatory provision is not provided with at least the same throughput as lost sites, and no new sites are allowed to come forward, this could reduce the borough's waste management capacity over time and jeopardise the SLWP's ability to plan for its identified waste needs and provide sufficient capacity to manage its apportioned tonnages of waste in line with London Plan policies SI8 B1 and B3. This is particularly pertinent given the small surpluses currently identified to meet the HC&I and C&D waste streams (surpluses of 1.8% and 1.4% of capacity respectively).</p> <p>The Mayor acknowledges SLWP officers' desire to provide land to meet the demand for industrial (non-waste) uses. However, industrial land demand is made up of a number of components including both core industrial uses (for example distribution and manufacturing) and wider industrial uses (such as</p>	<p>Noted. The Councils carefully considered all responses to the Issues and Preferred Options document and set out its response to each of these following the consultation. This is available online here: https://www.sutton.gov.uk/downloads/file/4623/p4_regulation_18_issues_and_preferred_options_representations_schedule</p> <p>This approach was also discussed when the Boroughs met with GLA officers prior to the publication of the draft SLWP, so our position has remained consistent.</p> <p>The draft SLWP does not prevent existing safeguarded sites being redeveloped for new waste facilities or being intensified. The approach of WP1 is aimed at entirely new</p>

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			<p>land for utilities and waste). Strategic demand evidence for core and wider industrial uses suggests a varied picture of demand for the three primary typologies (industrial, warehousing and waste) across the four boroughs. In some boroughs, strategic evidence demonstrates surplus demand for industrial use and insufficient capacity for waste, whereas in other boroughs the situation is reversed. Without more comprehensive local evidence of core and wider industrial demand it is difficult to demonstrate that new waste sites should be prevented across all four boroughs in order to allow capacity for other industrial uses.</p> <p>An amended policy should support new waste sites coming forward in appropriate circumstances, which could include criteria such as the site's position in the waste hierarchy and requirements around impact on amenity. Such an approach would support more sustainable waste management while balancing competing demands on industrial land.</p>	<p>proposals for new sites being developed that are not on safeguarded sites, unless it is for compensatory provision.</p> <p>The draft SLWP approach is appropriate as the plan demonstrates that it can meet its apportionment. The Councils should not be required to accommodate new sites, not providing compensatory provision, when they have such a pressing need for industrial land for other industrial uses and already planning for 13% than their collective arisings. It should also be noted that a number of sites, as set out in Appendix 2 of the draft SLWP, have capacity for intensification, which potentially could provide additional capacity on existing sites. Since the GLA's apportionment figures can be met on existing sites, there is no justification for accommodating further sites which could be sterilised for other industrial uses.</p> <p>The Councils industrial land evidence base, prepared in support of Local Plans, all indicate a shortage of industrial land. The Croydon Technical</p>

Rep No	Con No	Type of Representation	Representation	Comment
				<p>Report on Employment (2017) noted a tight industrial land market with the only release possible being some scattered employment sites adjoining residential areas. The Merton Employment and Economic Land Study (2010) came to the same conclusion. The Kingston Economic Analysis Study (2014) noted a very tight industrial land market with no scope for release. The Sutton Town Centre and Economic Development Assessment (2015) noted an extremely tight labour market. Consequently, the London Industrial Land Demand Study (2017) which advised Sutton as a “provide” borough and Croydon, Kingston and Merton as “retain” boroughs came as no surprise. Given the industrial demand, the Councils consider that encouraging addition sites that were not for compensatory provision would not be appropriate and it could have the effect of sterilising these sites for other industrial uses. Given this current convergence of all evidence, the Councils see no requirement to commission another study</p>

Rep No	Con No	Type of Representation	Representation	Comment
				<p>which is extremely likely to draw the same conclusion.</p> <p>In terms of managing waste further up the waste hierarchy, the Councils do not consider the approach will prevent this from taking place. Indeed, the Councils have already demonstrated comprehensively that existing safeguarded sites can provide new facilities that manage waste further up the waste hierarchy as two existing sites have already achieved this (Site S2 and Site S12) in the recent past.</p> <p>The Councils have experience of trying to operate the maximum compensatory capacity policy. The equivalent of existing throughput is a far more deliverable policy as contracts and traffic movement limitations may mean the maximum throughput may not be achievable. Therefore, the Councils consider the compensatory provision on a case-by-case basis is the optimal solution.</p> <p>London Plan Policy SI 8 (A) – “new waste management sites should be provided where</p>

Rep No	Con No	Type of Representation	Representation	Comment
				required". Given that the Councils are more than doing its bit by managing 13% more waste than it produces, that this can be met on existing sites, with potential for intensification on some sites to provide some flexibility over the plan period, the Councils do not consider that "new sites" are "required".
45.	Con25: South London Waste Partnership	Unsound – Not positively prepared, Not justified	<p>Recent work by the South London Waste Partnership to identify suitable and proximate facilities to realise the maximum environmental value from residents' source segregated food waste has shown that there is currently only one such facility located within the Partnership area (site M15 – Riverside AD Facility), and this does not have the capacity to treat all the food waste currently produced by residents in the Partnership area. This leads the Partnership to query whether Policy WP1(d) as currently worded is fully adequate to meet the current and future infrastructure needs of the area, in that it is possible that a new or intensified waste site may be required to house facilities for the management of food waste by anaerobic digestion in order to generate energy and an organic fertiliser for farmland.</p> <p>The Partnership notes that the western flank of the Hogsmill Sewage Treatment Works, described in paragraph 5.21 of the draft Plan, is adjacent to site K4 (Kingston Waste Transfer Station). It is the Partnership's view that the adjacency of the two sites presents an opportunity to consider the construction of an anaerobic digestion facility on this flank of the Hogsmill site in order to provide additional proximate food waste treatment infrastructure to meet the needs of the Partnership area.</p> <p>In order to make the Plan sound in that it would then more accurately reflect the likely future infrastructure needs of the South London Waste Plan area, I request the modification of policy WP1(d) such that after the words "...compensatory provision" should be added the words "or to meet a proven need for specialist waste treatment facilities not otherwise met within the Plan area."</p>	<p>Disagree. The draft SLWP does not prevent existing safeguarded sites from being intensified and actually encourages this in draft Policy WP1(c).</p> <p>Noted. However, the council doesn't really considered anaerobic digestion as a specialist facility. Notwithstanding this, specialist waste treatment can be transferred elsewhere due to the specialist nature of dealing with it.</p> <p>Furthermore, the proposed area is located within Metropolitan Open Land. Kingston have recently carried out our Green Belt and</p>

Rep No	Con No	Type of Representation	Representation	Comment
			[Representation repeated under 'New Site in Kingston: Land adjacent to Site K4 , part of the Hogsmill Sewage Treatment Works']	Metropolitan Open Land review and found this this area was still fulfilling its function.
46.	Con35: 777 Demolition & Haulage (BPP Consulting)	Unsound – Not positively prepared, Not justified	<p>The assessment of existing management capacity for waste appears to be an underestimate of actual capacity available in the Plan area. The draft Plan and supporting Technical Report contain inaccuracies, inconsistencies and unreasonable assumptions, resulting in existing capacity that is or can be made available for waste management being significantly underestimated.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Thirteen sites in Appendix 2 of the Plan are assessed as having zero i.e. no 'qualifying' capacity , substantially underestimating existing capacity available in the Plan area. A capacity assessment adopting the approach advocated in the London Plan, of interrogation of the Waste Data Interrogator for peak input over a five year period shows that most of the omitted sites did accept significant quantities of waste totalling nearly 250,000 tonnes of peak annual input. Even where the record does not show a particular site as being substantially active, that ought not detract from consideration of the site's potential given its lawful use for waste. • The potential (or not) for intensification is not consistently justified and is not quantified in the site schedules nor Appendix 2. The potential for intensification is a particularly critical consideration when determining the possible availability of compensatory capacity when seeking to release existing sites that would otherwise be safeguarded, and should be quantified in the site schedules and Appendix 2 of the Plan. The West London Waste Plan established that over 600,000tpa of management capacity could be provided by reconfiguring seven existing sites alone. • A 'best in class' (maximum) approach should be applied when assessing site potential, as what is taking place on a site may not reflect what could take place on a site given more favourable market conditions. • There are inconsistencies in the details for sites identified, named and delineated in the Technical Report, and for those that appear in the schedule of proposed safeguarded sites in the Plan and in Appendix 2, 	<p>Disagree. The sites accepted waste but it was for transfer not management. Therefore a capacity was not identified.</p> <p>The potential for intensification comes from two sources. The Technical report's assessment of whether a site is operating at maximum capacity and conversations with site owners themselves, see The Deliverability of Sites report.</p> <p>The Councils considers its approach is consistent with the GLA, who advocate an average over a period of years approach, not peak throughput.</p> <p>The alleged inconsistencies have not been detailed, which</p>

Rep No	Con No	Type of Representation	Representation	Comment																																													
			<p>indicating a confusion that brings the robustness of the evidence base into question.</p> <p>All the above are likely to contribute to an under-estimation of existing capacity and of potential for intensification of use, which far exceeds forecast requirements to manage waste arisings over the Plan period.</p> <p>The capacity data has been revisited applying the advice of the London Plan and the methods adopted in compiling the Technical Report. The outcome of this exercise is summarised below:</p> <p style="text-align: center;">Table Additional Capacity to that identified in the Technical Report to the Plan</p> <table border="1"> <thead> <tr> <th>Component</th> <th>Corrected Value</th> <th>Technical Report Estimate</th> <th>Difference</th> <th>Running total</th> </tr> </thead> <tbody> <tr> <td colspan="5"><i>Permitted Capacity</i></td> </tr> <tr> <td>i. Sites omitted from Tech Report but included in draft Plan¹</td> <td>662,987</td> <td>0</td> <td>+662,987</td> <td>662,987</td> </tr> <tr> <td>ii. Sites not assessed in Tech Report but assessed in draft Plan²</td> <td>178,593</td> <td>0</td> <td>+178,593</td> <td>841,580</td> </tr> <tr> <td>iii. Sites not assessed³</td> <td>245,022</td> <td>0</td> <td>+245,022</td> <td>1,086,602</td> </tr> <tr> <td colspan="5"><i>Exempt Sites</i></td> </tr> <tr> <td>i Under Count⁴</td> <td>83,885</td> <td>19,080</td> <td>+64,805</td> <td>1,151,407</td> </tr> <tr> <td>li Omitted Types⁵</td> <td>146,970</td> <td>0</td> <td>+146,970</td> <td>1,298,377</td> </tr> <tr> <td>Totals</td> <td></td> <td></td> <td></td> <td>1,298,377</td> </tr> </tbody> </table> <p>Footnotes to table:</p> <p>1 A number of sites (nine) not counted in the Technical Report as the evidence base of the Plan, were counted in the Plan itself. Therefore the calculation of capacity need presented in the Technical Report is under estimated by 662,987tpa.</p> <p>2 The Technical Report failed to include a capacity estimate for one site, Days Aggregate Purely Depot, but a throughput estimate was included in the Plan itself. Therefore the calculation of capacity need presented in the Technical Report is under estimated by a further 178,593 tpa.</p>	Component	Corrected Value	Technical Report Estimate	Difference	Running total	<i>Permitted Capacity</i>					i. Sites omitted from Tech Report but included in draft Plan ¹	662,987	0	+662,987	662,987	ii. Sites not assessed in Tech Report but assessed in draft Plan ²	178,593	0	+178,593	841,580	iii. Sites not assessed ³	245,022	0	+245,022	1,086,602	<i>Exempt Sites</i>					i Under Count ⁴	83,885	19,080	+64,805	1,151,407	li Omitted Types ⁵	146,970	0	+146,970	1,298,377	Totals				1,298,377	<p>makes it difficult to reply to. However, it should be noted that the Technical Report was prepared to inform the preparation of the Issues and Preferred Options document. Since this time some information will have changed which is reflected in the draft SLWP and the Delivery Plan. Furthermore, the Councils are analysing the latest EA Waste Interrogator data.</p> <p>The advice of the London Plan is not referenced in the representations, so the Councils are unclear what this refers to?</p> <p>The Council is unclear which sites are referred to as they are not referenced?</p> <p>Agree. That has been corrected. This came to light following the Issues and Options consultation.</p>
Component	Corrected Value	Technical Report Estimate	Difference	Running total																																													
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			<p>3 The Technical Report failed to include a capacity estimate for 13 sites, and nor was an estimate included in the Plan itself.</p> <p>When peak input to each of these sites over a five year period are considered this totals 245,022 tonnes per annum. Therefore the calculation of capacity need presented in the Technical Report and the Plan is under estimated by 245,022tpa.</p> <p>4 The Technical Report count of registered exemptions was significant less than the actual number indicated by the Agency register. Therefore the calculation of capacity need presented in the Technical Report and the Plan is under estimated by 83,885tpa.</p> <p>5 The Technical Report failed to account for a significant of exemptions types that ought to qualify as qualifying capacity and were counted in the Defra report the Technical report relies upon for the notional capacity value for the exemption selected for inclusion. Therefore the calculation of capacity need presented in the Technical Report and the Plan is under estimated by 146,970tpa.</p> <p>This re-assessment of capacity finds nearly 1.3 Million tonnes of additional management capacity within the Plan area. This means there is plenty of spare capacity to allow release of current sites that it may no longer be appropriate to safeguard due to lack of viability or suitability. This includes Site S1 operated by 777.</p> <p>As such, the safeguarding of all existing waste sites is excessive and unnecessary. In accordance with the plan-led approach to reviewing safeguarding stipulated in the London Plan, the sites proposed for safeguarding ought to be reviewed and rationalised so as not to apply overly-restrictive constraints to possible development for non-waste uses to deliver broader economic and development objectives where their current use may no longer be viable or desirable.</p>	<p>Disagree. The sites accepted waste but it was for transfer not management. Therefore a capacity was not identified.</p> <p>The Councils consider that the average over 5 years is a more robust way of assessing throughput and considers this to be the general approach used by other boroughs. But it does point to the fact that we do have plenty of capacity.</p> <p>The representation doesn't provide details of the exemptions that should have been included, which makes it difficult to provide response to. Exempt sites in the Technical Study were included where capacity met the requirements of the London Plan. A list of exemptions assumed relevant to the London Plan apportionment, and assumed capacities per site, are given in section 5.2.3 of the Technical Report.</p> <p>The Councils consider its approach is correct and consider the approach proposed in the representation</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>The safeguarding of all sites applies a severe and unnecessary constraint to re-development for non-waste uses. The draft Plan recognises there is high demand for business and industrial land in the Plan area, particularly Sutton, and sterilisation of land by applying waste designations too widely is to be avoided if a diverse and robust business base is to be supported, particularly given the current harsh economic climate.</p> <p>The Policy, and overall strategy, is therefore not positively prepared and not justified, and so is considered to be unsound.</p> <p>Changes Necessary Amendments to the evidence base, including Figures 13 and 15, demonstrating a larger surplus of existing waste management capacity available to manage forecast arisings/needs. Amendments to the schedule of sites proposed for safeguarding. Deletion of Site S1 from the schedule of sites to be safeguarded.</p> <p>[These comments from 777 Demolition & Haulage (BPP Consulting against WP1 were also made against WP2, so are repeated below]</p>	is a significant over estimate capacity.
47.	Con40: SUEZ	Unsound –Not Justified, Not Consistent with National Policy	<p>Within the accompanying text to policy WP1, Paragraph 5.7 states <i>“that the existing capacity for Household and Commercial and Industrial Waste is sufficient to meet the Mayors apportionment”</i>. This is illustrated within the accompanying Figure 13 with further detail provided in Appendix 2.</p> <p>Appendix 2 provides details of “Sites Counting Towards the Apportionment and C&D Target” and illustrates that South London will exceed the</p>	Noted. The Councils note the outstanding decision on the Benedict Wharf application and are monitoring its progress closely.

Rep No	Con No	Type of Representation	Representation	Comment
			<p>Household, Commercial and Industrial target by 16,565 tonnes per annum (tpa) and the Construction and Demolition target by 5,895 tpa.</p> <p>Within Appendix 2, SUEZ Site S12 BRRF contributes 305,000 tpa towards the total South London capacity of 946,345 tpa – approximately 32%. BRRF is not yet constructed but plays a significant and critical role in the achievement of the SLWP targets and SUEZ fully supports this strategy.</p> <p>However, within our representations on the SLWP Issues and Preferred Options Consultation (20.12.2019) we set out our intention to relocate from Benedict Wharf in Merton to BRRF in Sutton. BRRF would effectively provide significantly enhanced compensatory capacity for the existing operations at Benedict Wharf. The South London Waste Technical Paper demonstrates that the relocation from Benedict Wharf to the new BRRF would result in a maximum net increase of capacity for apportioned waste of around 200,000 tpa in South London.</p> <p>BRRF will only be constructed if Benedict Wharf can be redeveloped for an alternative use. However, on 18 June 2020, Merton Council’s planning committee considered an officer’s report for up to 850 new homes at Benedict Wharf (ref 19/P2383). The report recommended that outline planning permission was granted but the committee resolved to refuse the application, subject to referral to the Mayor of London.</p> <p>On 3 August, the Mayor of London confirmed that he will act as the decision maker for the purposes of determining the planning application. At the current time, a public hearing has not yet been scheduled so the construction of BRRF remains uncertain. Therefore, while SUEZ supports this strategy to meet needs and infrastructure requirements, we would express caution about the deliverability at this time pending the determination of planning application ref 19/P2383. This may be resolved by the time of Examination in early 2021.</p> <p>Policy WP1 (d) states “<i>New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3)</i>”.</p>	<p>The draft policies would allow new sites, for compensatory provision, so would apply if an operator was not able to redevelop its existing site.</p> <p>The evidence base supporting the economic policies in the 2020 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 South London is already providing 13% more waste management capacity than waste arising in the south London area, the plan is trying to balance the requirement to meet the London Plan targets with providing enough land for the high demand for non-waste industrial uses.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>Within our representations on the SLWP Issues and Preferred Options Consultation, we highlighted that this was potentially in conflict with paragraph 11 of the National Planning Policy Framework (NPPF), as such a restriction would prevent waste and recycling companies from providing new facilities to meet changing needs.</p> <p><i>“11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;” (with SUEZ emphasis underlined) SUEZ notes the Officer Response (March 2020): “there is a huge amount of untapped capacity on the existing sites with 528,231 tonnes for C&D waste and further untapped capacity within the existing sites managing HC&I. Consequently, new facilities not providing compensatory provision are not required.”.</i></p> <p>However, such an approach would still be limiting to an operator who could not accommodate a new facility within one of their existing sites and appears overly restrictive on the waste, recycling and circular economy sector.</p> <p>While the strategy of SLWP has identified that there is no need to identify and allocate sites or land for new waste capacity and notes the scarcity of industrial land, It has generally been appreciated that waste and recycling facilities can be accommodated on industrial land as one of the core employment uses. It would still be appropriate for new facilities to come forward to meet any identified need and issues of capacity and competition would be controlled by the market.</p> <p>Planning Practice Guidance highlights the need for flexibility within waste planning, stating (with SUEZ emphasis underlined):</p> <p><i>“What flexibility should waste planning authorities plan for when allocating sites?</i> <i>When identifying sites for waste management facilities, waste planning authorities should seek to demonstrate that the stock of allocated land provides sufficient opportunities to meet waste needs. <u>Since it is possible</u></i></p>	<p>The Councils consider there is sufficient flexibility within the plan. Firstly, the apportionment is 13% above arisings and</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p><i>that not all sites for the range of waste arisings that need to be catered for will be developed in practice, waste planning authorities should not rigidly cap development proposals at the level that may be put forward through the Local Plan. However, they may wish to plan for a 'close fit' of land allocations with planned waste management capacity for landfill sites, given that landfill is at the bottom of the Waste Hierarchy.</i></p> <p><i>As part of this process the waste planning authority should consider including policies to help steer the timing of land releases in line with the Local Plan. In doing so, however, they should take account of any identified constraints to site deliverability. This will include marketability to the waste management industry and the 'lead in' times that may arise from new infrastructure required to service sites, which although capable of resolution during the forward look of the Plan (otherwise the allocation should not have been made), could affect deliverability" (https://www.gov.uk/guidance/waste Paragraph: 038 Reference ID: 28-038-20141016)</i></p> <p><i>"When can unallocated sites be used?"</i> <i>There may be significant changes in, for example, technological impact and land ownership that occur over a short period of time and provide opportunities that were not anticipated.</i> <i>In the case of waste disposal facilities, applicants should be able to demonstrate that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the Waste Hierarchy. If the proposal is consistent with an up to date Local Plan, there is no need to demonstrate 'need'."</i> (https://www.gov.uk/guidance/waste Paragraph: 046 Reference ID: 28-046-20141016)</p>	<p>sufficient capacity has been identified on existing sites to meet this over the plan period. However, in addition, a number of facilities have identified potential for intensification, which would additional capacity not already taken into account. This gives the draft Waste Plan some flexibility in meetings apportionment over the plan period. Furthermore, new sites will be permitted where they are providing compensatory capacity (subject to other policies of the development plan).</p> <p>In terms of managing waste further up the waste hierarchy, the Councils do not consider the approach will prevent this from taking place. Indeed, the Councils have already demonstrated comprehensively that existing safeguarded sites can provide new facilities that manage waste further up the waste hierarchy as two existing sites have already achieved this (Site S2 and Site S12) in the recent past.</p>
48.	Con42: Viridor	Unsound – Not positively	A point by point response has not been provided to Viridor's earlier comments.	Disagree. The Council's provided a response to every

Rep No	Con No	Type of Representation	Representation	Comment
		prepared, not justified	<p>(a) We welcome the SLWP Borough's intention to work with the waste management industry to develop efficient and more effective management eliminating the need for additional waste capacity. The wording of the policy should be amended as effective management will not necessarily eliminate need. For example, although Beddington ERF receives and manages waste, it is simply not feasible for the facility to do this during maintenance periods. As such, facilities for accommodating temporary displacement of waste needs to be addressed.</p> <p>(c) Although we agree with the objective to meet targets by intensification of existing waste sites, this may not necessarily be realistic due to a sites' operational requirements. Therefore, extensions should also be included in meeting targets as a priority over vacant sites. This is a key point made in earlier representations, which has not been addressed. The emerging plan should consider including criteria-based policies under which future waste management facilities can be appropriately guided and subsequently assessed.</p> <p>(d) Waste Transfer Stations are often needed to support modern waste treatment facilities. Although a transfer facility is not needed while the Beddington ERF is operational, the waste needs to be accepted somewhere during any period the ERF is unavailable due to management or maintenance. At present, the Recycling Centre at Beddington is able to meet this need.</p>	<p>representation made at the Issues and Preferred Options stage. This is published on the website here: https://www.sutton.gov.uk/downloads/file/4623/p4_regulation_18_issues_and_preferred_options_representations_schedule</p> <p>As noted elsewhere in this schedule, The Recycling Centre only has a temporary planning permission until 202 after which is expected to be stored in accordance with the restoration plan. The site is located within MOL and the land forms part of the Wandle Valley Regional Park.</p>
49.	Con46: Resident BC	Unsound - Not Justified	<p>Why do we need another? Let the Shanklin Village Committee have access to plans.</p>	<p>Noted. The adopted South London Waste Plan expires in 2021. Therefore, a new plan needs to be produced to ensure the four boroughs have an update to strategy and policies to guide the determination of planning applications.</p>

Rep No	Con No	Type of Representation	Representation	Comment
				The draft South London Waste Plan is published online and is also available alongside the online survey that this response was completed in.
50.	Con47: Resident GK	Unsound - Not Effective	<p>WP1: How do you plan to develop efficient and more effective management and eliminate the need for additional waste capacity?</p> <p>Is it possible to provide any yearly targets for recycling, plastic waste reduction for each borough if any?</p>	Noted. As set out in draft Policy WP1 the boroughs will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. Boroughs will continue to develop strategies to help reduce waste and improve recycling. The Mayor of London has set a target of 65% municipal waste is recycled by 2030, 50% of local authority collected waste recycled by 2025 and 75% of business waste recycled by 2030. 95% of construction, demolition and excavation waste is also to be recycled by 2020.
Paragraph 5.20				
51.	Con7: Thames Water Utilities Ltd	Minor modification	Paragraph 5.20 refers to 'Thames Water Limited'. This should be corrected to "Thames Water Utilities Limited".	Agree. The Council's will update the references to Thame Water Utilities Limited.
Policy WP2: Strategic Approach to Other Forms of Waste				
52.	Con7: Thames Water Utilities Ltd	Sound – Consistent with National Policy	<p>We support Policy WP2 (d) relating to development for improvements/enhancement of sewage treatment works.</p> <p>Wastewater/sewerage infrastructure is essential to any development.</p> <p>Failure to ensure that any required upgrades to the infrastructure network</p>	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
			<p>are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>We support Policy WP2 (d) in line with the above policy/guidance.</p>	
53.	Con19 – D B Cargo (Firstplan as Agent)	Unsound – Not positively prepared, Not justified, Not Effective, Not consistent with National Policy	<p>Please refer to accompanying Statement of Response (Ref: VW/jc/17218_16.10.20) provided on behalf of DB Cargo and dealing with interlinked response to:</p> <ul style="list-style-type: none"> • Site Safeguarding - Omission of Chessington Railhead • Policy WP2 • Policy WP3 • Policy WP8 <p>Please refer to accompanying Statement of Response (Ref: VW/jc/17218_16.10.20) provided on behalf of DB Cargo setting out the changes considered necessary to make the draft South London Waste Plan sound.</p>	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
			[Please see Appendix 3]	
54.	Con25: South London Waste Partnership	Unsound – Not positively prepared	<p>I also request a modification of policy WP2(e) such that it should read: “(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. Such development may include the construction of anaerobic digestion facilities to treat municipal food waste.”</p> <p>[This Representation is also repeated under ‘New Site in Kingston: Land adjacent to Site K4 , part of the Hogsmill Sewage Treatment Works]</p>	Disagree. The Council’s consider the amendment unnecessary as the draft SLWP as worded does not prevent the enhancement of the sewage treatment works. It should be noted that the proposed site for an anaerobic digestion facility is located in MOL.
55.	Con35: 777 Demolition & Haulage (BPP Consulting)	Unsound – Not positively prepared, Not justified	<p>The assessment of existing management capacity for waste appears to be an underestimate of actual capacity available in the Plan area. The draft Plan and supporting Technical Report contain inaccuracies, inconsistencies and unreasonable assumptions, resulting in existing capacity that is or can be made available for waste management being significantly underestimated.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Thirteen sites in Appendix 2 of the Plan are assessed as having zero i.e. no ‘qualifying’ capacity , substantially underestimating existing capacity available in the Plan area. A capacity assessment adopting the approach advocated in the London Plan, of interrogation of the Waste Data Interrogator for peak input over a five year period shows that most of the omitted sites did accept significant quantities of waste totalling nearly 250,000 tonnes of peak annual input. Even where the record does not show a particular site as being substantially active, that ought not detract from consideration of the site’s potential given its lawful use for waste. • The potential (or not) for intensification is not consistently justified and is not quantified in the site schedules nor Appendix 2. The potential for intensification is a particularly critical consideration when determining the possible availability of compensatory capacity when seeking to 	<p>Disagree. The sites accepted waste but it was for transfer not management. Therefore a capacity was not identified.</p> <p>The potential for intensification comes from two sources. The Technical report’s assessment of whether a site is operating at maximum capacity and conversations with site owners themselves, see The Deliverability of Sites report.</p>

Rep No	Con No	Type of Representation	Representation	Comment																																													
			<p>release existing sites that would otherwise be safeguarded, and should be quantified in the site schedules and Appendix 2 of the Plan. The West London Waste Plan established that over 600,000tpa of management capacity could be provided by reconfiguring seven existing sites alone.</p> <ul style="list-style-type: none"> • A 'best in class' (maximum) approach should be applied when assessing site potential, as what is taking place on a site may not reflect what could take place on a site given more favourable market conditions. • There are inconsistencies in the details for sites identified, named and delineated in the Technical Report, and for those that appear in the schedule of proposed safeguarded sites in the Plan and in Appendix 2, indicating a confusion that brings the robustness of the evidence base into question. <p>All the above are likely to contribute to an under-estimation of existing capacity and of potential for intensification of use, which far exceeds forecast requirements to manage waste arisings over the Plan period.</p> <p>The capacity data has been revisited applying the advice of the London Plan and the methods adopted in compiling the Technical Report. The outcome of this exercise is summarised below:</p> <p style="text-align: center;">Table Additional Capacity to that identified in the Technical Report to the Plan</p> <table border="1"> <thead> <tr> <th>Component</th> <th>Corrected Value</th> <th>Technical Report Estimate</th> <th>Difference</th> <th>Running total</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;"><i>Permitted Capacity</i></td> </tr> <tr> <td>i. Sites omitted from Tech Report but included in draft Plan¹</td> <td>662,987</td> <td>0</td> <td>+662,987</td> <td>662,987</td> </tr> <tr> <td>ii. Sites not assessed in Tech Report but assessed in draft Plan²</td> <td>178,593</td> <td>0</td> <td>+178,593</td> <td>841,580</td> </tr> <tr> <td>iii. Sites not assessed³</td> <td>245,022</td> <td>0</td> <td>+245,022</td> <td>1,086,602</td> </tr> <tr> <td colspan="5" style="text-align: center;"><i>Exempt Sites</i></td> </tr> <tr> <td>i Under Count⁴</td> <td>83,885</td> <td>19,080</td> <td>+64,805</td> <td>1,151,407</td> </tr> <tr> <td>ii Omitted Types⁵</td> <td>146,970</td> <td>0</td> <td>+146,970</td> <td>1,298,377</td> </tr> <tr> <td>Totals</td> <td></td> <td></td> <td></td> <td>1,298,377</td> </tr> </tbody> </table>	Component	Corrected Value	Technical Report Estimate	Difference	Running total	<i>Permitted Capacity</i>					i. Sites omitted from Tech Report but included in draft Plan ¹	662,987	0	+662,987	662,987	ii. Sites not assessed in Tech Report but assessed in draft Plan ²	178,593	0	+178,593	841,580	iii. Sites not assessed ³	245,022	0	+245,022	1,086,602	<i>Exempt Sites</i>					i Under Count ⁴	83,885	19,080	+64,805	1,151,407	ii Omitted Types ⁵	146,970	0	+146,970	1,298,377	Totals				1,298,377	<p>The Councils considers its approach is consistent with the GLA, who advocate an average over a period of years approach, not peak throughput.</p> <p>This inconsistencies have not been detailed. However, it should be noted that the Technical Report was prepared to inform the preparation of the Issues and Preferred Options document. Since this time some information will have changed.</p> <p>The advice of the London Plan is not referenced in the representations, so the Councils are unclear what this refers to?</p>
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			<p>Footnotes to table:</p> <p>1 A number of sites (nine) not counted in the Technical Report as the evidence base of the Plan, were counted in the Plan itself. Therefore the calculation of capacity need presented in the Technical Report is under estimated by 662,987tpa.</p> <p>2 The Technical Report failed to include a capacity estimate for one site, Days Aggregate Purely Depot, but a throughput estimate was included in the Plan itself. Therefore the calculation of capacity need presented in the Technical Report is under estimated by a further 178,593 tpa.</p> <p>3 The Technical Report failed to include a capacity estimate for 13 sites, and nor was an estimate included in the Plan itself.</p> <p>When peak input to each of these sites over a five year period are considered this totals 245,022 tonnes per annum. Therefore the calculation of capacity need presented in the Technical Report and the Plan is under estimated by 245,022tpa.</p> <p>4 The Technical Report count of registered exemptions was significant less than the actual number indicated by the Agency register. Therefore the calculation of capacity need presented in the Technical Report and the Plan is under estimated by 83,885tpa.</p> <p>5 The Technical Report failed to account for a significant of exemptions types that ought to qualify as qualifying capacity and were counted in the Defra report the Technical report relies upon for the notional capacity value for the exemption selected for inclusion. Therefore the calculation of capacity need presented in the Technical Report and the Plan is under estimated by 146,970tpa.</p> <p>This re-assessment of capacity finds nearly 1.3 Million tonnes of additional management capacity within the Plan area. This means there is plenty of spare capacity to allow release of current sites that it may no longer be</p>	<p>The Council is unclear which sites are referred to as they are not referenced?</p> <p>Agree. That has been corrected. This came to light following the Issues and Options consultation.</p> <p>This is because they were transferring waste and not managing it.</p> <p>The Councils consider that the average over 5 years is a more robust way of assessing throughput and considers this to be the general approach used by other boroughs. But it does point to the fact that we do have plenty of capacity.</p> <p>The representation doesn't provide details of the exemptions that should have been included, which makes it difficult to provide response to. Exempt sites in the Technical</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>appropriate to safeguard due to lack of viability or suitability. This includes Site S1 operated by 777.</p> <p>As such, the safeguarding of all existing waste sites is excessive and unnecessary. In accordance with the plan-led approach to reviewing safeguarding stipulated in the London Plan, the sites proposed for safeguarding ought to be reviewed and rationalised so as not to apply overly-restrictive constraints to possible development for non-waste uses to deliver broader economic and development objectives where their current use may no longer be viable or desirable.</p> <p>The safeguarding of all sites applies a severe and unnecessary constraint to re-development for non-waste uses. The draft Plan recognises there is high demand for business and industrial land in the Plan area, particularly Sutton, and sterilisation of land by applying waste designations too widely is to be avoided if a diverse and robust business base is to be supported, particularly given the current harsh economic climate.</p> <p>The Policy, and overall strategy, is therefore not positively prepared and not justified, and so is considered to be unsound.</p> <p>Changes Necessary Amendments to the evidence base, including Figures 13 and 15, demonstrating a larger surplus of existing waste management capacity available to manage forecast arisings/needs. Amendments to the schedule of sites proposed for safeguarding. Deletion of Site S1 from the schedule of sites to be safeguarded.</p> <p>[These comments from 777 Demolition & Haulage (BPP Consulting against WP1 were also made against WP2, so are repeated below)]</p>	<p>Study were included where capacity met the requirements of the London Plan. A list of exemptions assumed relevant to the London Plan apportionment, and assumed capacities per site, are given in section 5.2.3 of the Technical Report.</p> <p>The Councils consider its approach is correct and consider the approach proposed in the representation is a significant over estimate capacity.</p>
Policy WP3: Existing Waste Sites				

Rep No	Con No	Type of Representation	Representation	Comment
56.	Con1: The Mayor of London	Non-conformity with the London Plan	<p>Compensatory provision for the loss of existing waste sites (throughput)</p> <p>Draft Policy WP3 (c) proposes that the level of compensatory provision replacing the loss of an existing safeguarded waste site will be considered on a case-by-case basis. This is contrary to London Plan Policy SI9 C, which requires that the provision of compensatory capacity for lost waste sites should ‘...at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.’ This is therefore a point of non-conformity with the ItP London Plan.</p> <p>While it is noted that draft Policy WP4 (a) requires that sites for compensatory provision must be able to demonstrate that they ‘...are capable of providing sufficient compensatory capacity’, the term ‘sufficient’ is not adequately defined. This could result in the provision of compensatory capacity at a lower throughput than the waste site proposed to be lost, and that would therefore put the Mayor’s waste net self-sufficiency target at risk.</p> <p>The Mayor acknowledges the difficulties expressed by SLWP officers relating to achieving maximum throughputs and the potential trade-offs that may be beneficial to consider (for example, weighing up any potential amenity benefits that could be achieved at the expense of site throughput). However, ItP London Plan Policies SI8 and SI9 take a clear approach to compensatory provision for the loss of existing waste sites and a conflicting approach in the SLWP is likely to lead to confusion for applicants and undermine the implementation of the ItP London Plan.</p> <p>This issue could be resolved by removing the reference to a “case-by-case” consideration of compensatory provision in Part C of draft Policy WP3 and adding clear criteria to Policy WP4 which mirror the requirements of London Plan Policy SI9 C.</p>	<p>The Councils will attempt to achieve maximum throughput when determining applications.</p> <p>However, the equivalent of existing throughput is a far more deliverable policy as contracts and traffic movement limitations may mean the maximum throughput may not be achievable. Therefore, the Councils consider the compensatory provision on a case-by-case basis is the optimal solution.</p> <p>For example, the Councils do not realistic to ask a small skip sorter to increase his capacity</p>

Rep No	Con No	Type of Representation	Representation	Comment
57.	Con1: The Mayor of London	Non-conformity with the London Plan	<p>Waste hierarchy (compensatory provision) Draft Policy WP3(e) states: <i>“Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.”</i></p> <p>The principle of this policy to at least maintain the waste hierarchy level is strongly supported, but its application seems to not apply to waste development on sites that are not already in waste use. As such this policy requirement, would not apply where compensatory provision is provided on a site that is not an existing safeguarded waste site. Furthermore, when applied to compensatory provision, as written draft Policy WP3 (e) suggests this provision would be compared to the pre-existing situation on the compensatory site rather than on the site that is being compensated for.</p> <p>This could result in compensatory provision for the loss of a waste site being made at a lower level in the waste hierarchy compared to the lost site and would not meet the requirement of London Plan SI9 C that compensatory capacity be made ‘...at or above the same level of the waste hierarchy...’. This is a matter of non-conformity with the ItP London Plan.</p> <p>This issue could be resolved by clarifying that draft Policy WP3 (e) applies to compensatory capacity provided on sites that are not existing safeguarded waste sites and that this capacity must be at or above the same level in the waste hierarchy of the lost site. In addition, these criteria should also be added to the draft Sites for Compensatory Provision Policy (WP4) as suggested above to maintain consistency.</p> <p>Waste hierarchy (general) The removal of the reference to a flexible/case-by-case implementation of the waste hierarchy in the supporting text of Policy WP3 is welcomed. While we acknowledge the SLWP’s view that it is not always possible to go up the waste hierarchy when redeveloping existing safeguarded waste sites and that some development may come forward at the same level, we would encourage Policy WP3 (e) be amended to at least provide encouragement for the redevelopment of existing waste sites to come forward at a higher</p>	<p>The Councils note the suggested changes to the policy.</p> <p>Noted.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			level in the hierarchy. Additionally, as suggested above, inclusion of the waste hierarchy in Policy WP4 would further strengthen its implementation.	
58.	Con1: The Mayor of London	Non-conformity with the London Plan	<p>Transfer of apportionment</p> <p>SLWP officers confirmed at a recent meeting², that the SLWP does not provide support for offering surplus capacity/sites to other London boroughs should they be released, a position that has been adopted to meet the demand for (non-waste) industrial uses. The Mayor expects the SLWP boroughs to work positively towards net waste self-sufficiency at a London level in line with supporting text paragraph 9.8.6 and Policy SI 8 of the ItP London Plan. The Mayor's ambition for net waste self-sufficiency by 2026 could be reflected in the SLWP, particularly, in the wording of draft Policy WP3 (d). SLWP boroughs should continue to engage with other boroughs who may have a shortfall of waste management capacity through the Duty to Cooperate.</p>	<p>Disagree. The London Plan ItP sets an apportionment figure (pooled) for the four South London Waste plan boroughs that is 13% above arisings. As set out in the draft SLWP there is sufficient capacity to exceed this apportionment figure. As such the four boroughs are working positively towards delivering net self-sufficient in London by exceeding, not only arisings, but apportionment too. Given the pressure for industrial land in South London, and the competition for this type of land from waste operators, the Council do not consider it unrealistic to expect the boroughs to take even more waste from other London boroughs.</p> <p>It is acknowledge that paragraph 9.8.6 of the London Plan ItP suggests that boroughs with a surplus of</p>

Rep No	Con No	Type of Representation	Representation	Comment
				<p>waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site Release. However, this suggestion only appears in supporting text to Policy SI 8 and not the Policy itself. As such the Councils do not consider this to be policy, (see Cherkley Court v Mole Valley).</p> <p>The approach suggested by the Mayor in para 9.8.6 would conflict with Policy SI 8 B(3), which states that development plans should <i>“allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are encouraged to collaborate by pooling their apportionment requirements”</i>. This is what the draft SLWP has done; it has allocated sufficient sites to meet the pooled apportionment.</p>
59.	Con15: King Concrete	Support and Suggestion	I write on behalf of my client King Concrete Ltd concerning the above consultation. I act as their planning agent. Their site at 124 Beddington Lane, Sutton is listed as site S8 on page 87 of the current document.	<p>Noted.</p> <p>The Councils contend that dust particles can be managed in an</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>I can confirm that King Concrete support their inclusion as a safeguarded site under Policy WP3 Existing Waste Sites.</p> <p>With regard to the issues to consider if there is a further planning application, whilst they also support the overall objective of enclosing operations within a building (bullet point 1) they would just like to point out that this is sometimes impractical for various operational and health and safety reasons, for example such as the management of PM10 emissions in an enclosed space. We therefore would encourage you to include the words 'where possible' at the end of the sentence of the first bullet point.</p> <p>[This representation is also repeated under 'Site S8: King Concrete, 124 Beddington Lane, Sutton']</p>	enclosed building and do not wish the outside environment to be polluted with PM10 particles.
60.	Con18 Day Group Ltd (Firstplan as agent)	Sound – Consistent with national policy	<p><u>WP3 – The Safeguarding of Existing Waste Sites</u></p> <p>The Issues and Preferred Options Draft Policy WP3 (a) stated that 'The sites set out on Pages 42 – 90 of the South London Waste Plan will be safeguarded for waste use only.' This policy wording was identified as being 5</p> <p>problematic for the Day Aggregate site at Purley (Site C4) as it also accommodates an important rail depot site for minerals use as set out in the background section above.</p> <p>In this context, and in response to Question 6 of the Response Forms, amendments to Policy WP3 as provided by the Submission Draft SWLP which confirm in the context of safeguarding that '(a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/minerals uses only' are supported.</p> <p>This amendment ensures that the Plan meets the tests of soundness in terms of being 'consistent with national' policy which requires safeguarding of rail served mineral uses such as those co-located with the waste use at the Purley site.</p> <p>[Also see Appendix 2]</p>	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
61.	Con19 – D B Cargo (Firstplan as Agent)	Unsound – Not positively prepared, Not justified, Not Effective, Not consistent with National Policy	<p>Please refer to accompanying Statement of Response (Ref: VW/jc/17218_16.10.20) provided on behalf of DB Cargo and dealing with interlinked response to:</p> <ul style="list-style-type: none"> • Site Safeguarding - Omission of Chessington Railhead • Policy WP2 • Policy WP3 • Policy WP8 <p>Please refer to accompanying Statement of Response (Ref: VW/jc/17218_16.10.20) provided on behalf of DB Cargo setting out the changes considered necessary to make the draft South London Waste Plan sound.</p> <p>[Please see Appendix 3]</p>	Noted.
62.	Con35: 777 Demolition & Haulage	Unsound – Not Positively Prepared, Not Justified, Not Consistent with National Policy	<p>Application of safeguarding National Planning Policy for Waste itself does not require safeguarding of waste sites, only that in preparation of plans consideration is given to the extent to which the capacity of existing operational facilities would satisfy any identified need.</p> <p>London Plan (ItP) Policy SI8 (2) requires existing waste management sites to be safeguarded, and Policy SI9 requires existing waste sites to be safeguarded and retained in waste use (A), and that waste plans should be adopted before considering the loss of waste sites (C). It states "<i>Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost</i>" (para 9.9.2).</p> <p>The Plan confirms that the existing capacity for management of Household, Commercial & Industrial (HCI) Waste and Construction, Demolition & Excavation (CDE) waste exceeds predicted requirements over the Plan period, concluding there is no need to identify any new land for waste development. And yet Policy WP3 safeguards all existing waste sites</p>	<p>Noted.</p> <p>The Councils consider It is necessary to safeguard all the sites to meet the apportionment and to give flexibility to deal with an unexpected eventualities.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>ensure identified in the site schedules regardless of their actual need, viability or suitability.</p> <p>By requiring that compensatory capacity be provided within the Plan area and not within London as a whole, the Policy applies safeguarding in a stricter way than the London Plan.</p> <p>Moreover, the London Plan states at Para 9.8.7 that "Plans or agreements safeguarding waste sites should take a flexible approach." Contrary to this advice clause (d) of the draft Plan Policy excludes compensatory provision outside the Plan area [or rather accepted as evidence to justify release from safeguarding and allowing non-waste development]. This is overly restrictive given the nature of waste movement for management across London, and is not in conformity with the London Plan.</p> <p>Justification and Need for safeguarding One of the safeguarded sites is Site S1 777 Recycling Centre at 154a Beddington Lane. The Site is identified as having a maximum throughput of 56,912 tonnes per annum, and a 'qualifying' throughput of 53,597 tpa.</p> <p>The actual throughput of the site in recent years has been significantly lower than the maximum value applied, with a peak in 2014 of 45,614 tonnes after which inputs have dropped to less than 30,000 tpa through to 2018, giving a 5-year average of just over 30,000 tpa. Input in 2020 (January to September) was much reduced to only 12,352 tonnes. This low and declining throughput reflects the dynamic waste market within London and the increasingly capital-intensive nature of high quality waste recycling facilities. Such a reduced level of throughput is not commercially viable, and the operator is therefore seeking to exit the waste management market and cease waste management, whilst remaining in control of the property.</p> <p>Moreover, if this site were to continue to be safeguarded, applying the correct 5-year average throughput of the site would mean compensatory provision of 30,000tpa would need to be demonstrated, rather than the 56,912tpa indicated in the Plan. The operator has received assurances from</p>	<p>The Councils consider that the compensatory capacity needs to be provided in the plan area to maintain the waste capacity of the four boroughs.</p> <p>I think you mean para 9.8.10 actually.</p> <p>The Technical Report was produced in 2017 in support on the Issues and Options document. In light of the consultation, changes were made to in the Draft SLWP and the Delivery Plan, to reflect any new information that came to light. However, the Council are looking at the most recently available data on the EA Waste Interrogator that was recently made available in late 2020.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>other operators of sites within the South London Waste Plan area that surplus capacity exists at their sites to manage this waste.</p> <p>This analysis demonstrates that the Plan and supporting Technical Report:</p> <ol style="list-style-type: none"> 1. significantly under-estimate the amount of existing waste management capacity in the Plan area; and 2. fails to properly assess and quantify the potential for intensification of existing sites. <p>Our evidence demonstrates that there is a larger excess of capacity than indicated in the Plan, and therefore safeguarding of all of the existing sites as proposed in the Plan is neither necessary nor justified. It would apply unnecessary and severe constraints to the availability of much needed land that might be developed for non-waste business and commercial purposes.</p> <p>The Policy, and Strategy, are therefore not positively prepared, not justified, and not effective (as it would be almost impossible to deliver the requirements to overcome safeguarding).</p> <p>Changes Necessary</p> <p>The Policy should enable provision of compensatory capacity outside of the Plan area, but within London, to be accepted as demonstration that compensatory capacity is available and is taken into account in allowing release of safeguarded sites for non-waste development.</p> <p>The Policy should make it clear that 'compensatory provision' also includes notional capacity at existing waste sites where throughput can be increased through reconfiguration and/or intensification of the operations at the particular site. This should include consideration of the maximum achievable throughput of a site reflecting its size and particular context. Our assessment demonstrates that the amount of capacity available at existing sites in the Plan area is much greater than indicated in the Plan and its evidence base. There is, therefore, no need to safeguard all sites and the creation of an updated Plan ought to be used as the opportunity to release sites with wider development potential. This is to be in conformity with the London Plan expectation that the plan-led process (and so preparation of a</p>	<p>Disagree - The evidence base supporting the economic policies in the 2020 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</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>new waste plan) is the mechanism by which safeguarding being applied to sites should be reviewed and released as appropriate.</p> <p>Site S1 should be deleted from the schedule of safeguarded sites. The throughput of the Site is much lower than the Plan indicates with a five-year average of around 30,000 tonnes per annum, with declining throughput in recent years, reflecting the lack of demand for the type of waste management capacity provided and a surplus of capacity available to serve the area.</p>	<p>capacity. As South London is already providing 13% more waste management capacity than waste arising in the south London area, the plan is trying to balance the requirement to meet the London Plan targets with providing enough land for the high demand for non-waste industrial uses.</p> <p>The Councils should not be required to offer sites to other London boroughs when they have such a pressing need for industrial land for other industrial uses and already planning for 13% than their collective arisings.</p> <p>Even if the Councils accepted that the five year average is only 30,000tpa they do not agree that this is an insignificant amount. Infact, it's only just short of total capacity in Kingston.</p> <p>However, the Councils will consider the latest published EA Waste Interrogator data.</p>
63.	Con36: Spaces4 Work (BPP	Unsound – Not Positively Prepared, Not Justified, Not	National Planning Policy for Waste itself does not require safeguarding of waste sites, only that in preparation of plans consideration is given to the extent to which the capacity of existing operational facilities would satisfy	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
	Consulting agent)	Consistent with National Policy	<p>any identified need. However, London Plan policy applies safeguarding to all waste sites.</p> <p>The Plan confirms that the existing capacity for management of Household, Commercial & Industrial (HCI) waste (subject to the London Plan apportionment) and Construction, Demolition & Excavation (CDE) waste exceeds predicted requirements over the Plan period, when assessed against the London Plan apportionment and projected arisings of CDE waste concluding there is no need to identify any new land for waste development.</p> <p>This is against a backdrop of the forecasts of arisings now considered to be in excess of what can be reasonably expected for the following reasons:</p> <ol style="list-style-type: none"> 1. the London Plan apportionments are based on forecasts that are now unlikely to materialise given the fundamental shock to the economic system from Covid, and in particular the shift towards home working that is expected to continue going forward. <p>This means that projected arisings at places of work such as offices and retail space will be significantly less, along with those from support sectors such as hospitality. Whereas arisings of waste at homes can be expected to rise, this will be managed as household waste predominately outside of the Boroughs within the Plan area or even London itself. It is notable that data for commuting in London shows that around three quarters of the working population of the Plan area Boroughs actually live outside the Boroughs in which they work.</p> <ol style="list-style-type: none"> 2. the draft Plan proposes to adopt a forecast for C,D & E waste that projects an increase of arisings applying the GLA's employment figures in the construction sector, whereas national Planning Practice Guidance actually advises that: <i>"Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes."</i> (Paragraph: 033 Reference ID: 28-033-2014 	

Rep No	Con No	Type of Representation	Representation	Comment
			<p>1016). Moreover, no evidence is offered to justify a correlation between employment numbers and growth in waste arisings. Considering the ongoing drive to reduce waste management costs, conserve valuable and costly building materials and create more sustainable buildings, it is considered that a linear relationship between employment and waste growth should not be assumed.</p> <p>The above factors mean that the forecasts upon which projected need is based within the Plan are in error and are therefore not justified. Both result in the management requirements planned to be provided for being overestimated.</p> <p>In addition, the assessment of existing capacity appears to be an underestimate of actual permitted capacity available in the Plan area. We note that the Tables reporting inputs and outputs to permitted waste sites presented in the section of the evidence base Technical Report '1 Inputs & Outputs of Permitted Waste Sites' includes 2018 data for Croydon but not the other three Boroughs covered by the Plan. However, the maximum throughput for Croydon sites is measured against 2017 data. This is one example of inconsistency within the evidence base.</p> <p>To aid the Examination, a review to identify peak throughput to all the Plan Area sites reported through the Environment Agency Waste Data Interrogator, has been undertaken for all Boroughs through to 2018, as per the guidance presented in the London Plan. The results are presented in Table 1 below:</p>	<p>The Councils are analysing the latest EA Waste Interrogator data.</p> <p>The Council's do not agree that maximum (peak) throughput is the best approach, A five year average should be used to calculate throughput for the purposes of the capacity over the plan period.</p>

Rep No	Con No	Type of Representation	Representation	Comment																																																																																																																																																																																																																																																																																																																																																																																										
			<p>Table 1. EA Waste Data Interrogator data for operational intermediate² waste sites in SLWP Area at 2018</p> <table border="1"> <thead> <tr> <th>Site</th> <th>2014</th> <th>2015</th> <th colspan="3">Year</th> <th>5 year peak</th> </tr> <tr> <th></th> <th></th> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> <th></th> </tr> </thead> <tbody> <tr> <td>Croydon WPA</td> <td>326,990</td> <td>327,822</td> <td>281,122</td> <td>250,710</td> <td>253,709</td> <td></td> </tr> <tr> <td>56-58 Factory Lane</td> <td>-</td> <td>8,230</td> <td>14,253</td> <td>1,409</td> <td>-</td> <td>14,255</td> </tr> <tr> <td>64 Northwood Rd, Thornton Heath</td> <td>6,198</td> <td>6,795</td> <td>8,206</td> <td>9,294</td> <td>8,855</td> <td>9,294</td> </tr> <tr> <td>Able Waste Services Ltd</td> <td>2,247</td> <td>15,317</td> <td>32,689</td> <td>46,463</td> <td>56,699</td> <td>56,699</td> </tr> <tr> <td>Croydon Car Spares, Aurelia Rd</td> <td>222</td> <td>176</td> <td>157</td> <td>128</td> <td>-</td> <td>222</td> </tr> <tr> <td>Day Aggregates Purley Depot</td> <td>196,400</td> <td>179,300</td> <td>118,650</td> <td>113,171</td> <td>76,195</td> <td>196,400</td> </tr> <tr> <td>Factory Lane Special Waste Transfer Station</td> <td>14,590</td> <td>17,383</td> <td>19,736</td> <td>16,614</td> <td>14,013</td> <td>19,736</td> </tr> <tr> <td>Fishers Farm</td> <td>5,330</td> <td>6,572</td> <td>6,895</td> <td>6,466</td> <td>5,569</td> <td>6,895</td> </tr> <tr> <td>Henry Woods Waste Management Ltd</td> <td>15,183</td> <td>11,658</td> <td>8,150</td> <td>9,815</td> <td>13,025</td> <td>15,183</td> </tr> <tr> <td>New Era Assets Limited</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>14,577</td> <td>14,577</td> </tr> <tr> <td>New Era Metals</td> <td>2,528</td> <td>2,355</td> <td>3,041</td> <td>4,213</td> <td>4,272</td> <td>4,272</td> </tr> <tr> <td>Purley Oaks Civic Amenity Site</td> <td>6,661</td> <td>7,698</td> <td>9,099</td> <td>9,028</td> <td>8,853</td> <td>9,099</td> </tr> <tr> <td>Purley Oaks Depot</td> <td>6,252</td> <td>13,533</td> <td>-</td> <td>-</td> <td>-</td> <td>13,533</td> </tr> <tr> <td>SafetyKleen Coulsdon</td> <td>884</td> <td>731</td> <td>963</td> <td>748</td> <td>727</td> <td>963</td> </tr> <tr> <td>Sam Smith, Peartree Fm, Addington</td> <td>48,755</td> <td>48,799</td> <td>59,282</td> <td>33,360</td> <td>44,600</td> <td>59,282</td> </tr> <tr> <td>Stubbs Mead Depot</td> <td>21,740</td> <td>9,276</td> <td>-</td> <td>-</td> <td>6,325</td> <td>21,740</td> </tr> <tr> <td>Kingston Upon Thames WPA</td> <td>84,018</td> <td>81,268</td> <td>80,145</td> <td>82,015</td> <td>76,829</td> <td></td> </tr> <tr> <td>Genuine Solutions Group Limited</td> <td>682</td> <td>342</td> <td>235</td> <td>317</td> <td>172</td> <td>682</td> </tr> <tr> <td>Kingston Civic Amenity Site</td> <td>14,363</td> <td>13,443</td> <td>13,437</td> <td>13,401</td> <td>12,073</td> <td>14,363</td> </tr> <tr> <td>Kingston Waste Transfer Station</td> <td>68,974</td> <td>67,484</td> <td>66,473</td> <td>68,297</td> <td>64,584</td> <td>68,974</td> </tr> <tr> <td>Merton WPA</td> <td>660,334</td> <td>546,646</td> <td>671,585</td> <td>727,028</td> <td>773,812</td> <td></td> </tr> <tr> <td>32 Willow Lane</td> <td>11,055</td> <td>-</td> <td>19,146</td> <td>38,738</td> <td>56,920</td> <td>56,920</td> </tr> <tr> <td>77 Weir Road</td> <td>23,681</td> <td>48,687</td> <td>43,151</td> <td>18,654</td> <td>16,811</td> <td>48,687</td> </tr> <tr> <td>B & T @ Work</td> <td>1,004</td> <td>2,455</td> <td>2,833</td> <td>3,729</td> <td>2,743</td> <td>3,729</td> </tr> <tr> <td>B Nebbett & Son Limited</td> <td>65,200</td> <td>10,333</td> <td>64,375</td> <td>65,050</td> <td>57,748</td> <td>65,200</td> </tr> <tr> <td>Garth Road Civic Amenity Site</td> <td>11,867</td> <td>11,516</td> <td>14,594</td> <td>11,800</td> <td>11,496</td> <td>14,594</td> </tr> <tr> <td>Garth Road Transfer Station</td> <td>11,146</td> <td>8,278</td> <td>13,628</td> <td>18,839</td> <td>22,642</td> <td>22,642</td> </tr> <tr> <td>George Killoughery Limited (Mitcham)</td> <td>37,334</td> <td>7,774</td> <td>33,360</td> <td>32,853</td> <td>23,477</td> <td>37,334</td> </tr> <tr> <td>Japanese Direct Ltd</td> <td>26</td> <td>60</td> <td>-</td> <td>-</td> <td>-</td> <td>60</td> </tr> <tr> <td>L M D Waste Management Limited</td> <td>-</td> <td>3,692</td> <td>14,503</td> <td>24,444</td> <td>38,459</td> <td>38,459</td> </tr> <tr> <td>Maguire Skips</td> <td>28,616</td> <td>16,626</td> <td>29,718</td> <td>58,150</td> <td>67,719</td> <td>67,719</td> </tr> <tr> <td>Mitcham Transfer Station</td> <td>286,485</td> <td>234,541</td> <td>190,320</td> <td>205,945</td> <td>227,326</td> <td>286,485</td> </tr> <tr> <td>Mitcham Waste Treatment Centre</td> <td>42,474</td> <td>43,428</td> <td>44,481</td> <td>43,507</td> <td>48,135</td> <td>48,135</td> </tr> <tr> <td>Morden Transfer Station</td> <td>36,387</td> <td>30,340</td> <td>39,950</td> <td>39,817</td> <td>36,147</td> <td>39,950</td> </tr> <tr> <td>Unit 7, Abbey Industrial Estate</td> <td>5</td> <td>51</td> <td>62</td> <td>141</td> <td>144</td> <td>144</td> </tr> <tr> <td>Weir Road Waste Transfer Station</td> <td>31,770</td> <td>49,221</td> <td>45,415</td> <td>53,333</td> <td>46,027</td> <td>53,313</td> </tr> <tr> <td>Riverside AD Facility</td> <td>-</td> <td>7,360</td> <td>44,585</td> <td>46,341</td> <td>51,012</td> <td>51,012</td> </tr> <tr> <td>Unit 6, Weir Road,</td> <td>73,285</td> <td>71,595</td> <td>70,661</td> <td>65,055</td> <td>66,914</td> <td>73,285</td> </tr> <tr> <td>Unit 3-5, 39 Willow Lane</td> <td>-</td> <td>688</td> <td>804</td> <td>651</td> <td>93</td> <td>804</td> </tr> <tr> <td>Sutton WPA</td> <td>193,823</td> <td>175,414</td> <td>160,313</td> <td>198,650</td> <td>586,209</td> <td></td> </tr> <tr> <td>124 Beddington Lane</td> <td>-</td> <td>-</td> <td>-</td> <td>1,060</td> <td>1,100</td> <td>1,100</td> </tr> <tr> <td>777 Group Headquarters And Depot</td> <td>83</td> <td>119</td> <td>142</td> <td>-</td> <td>-</td> <td>142</td> </tr> <tr> <td>777 Recycling Centre</td> <td>45,614</td> <td>28,507</td> <td>28,041</td> <td>26,846</td> <td>27,034</td> <td>45,614</td> </tr> <tr> <td>Commercial In confidence</td> <td>99,977</td> <td>-</td> <td>-</td> <td>103,751</td> <td>-</td> <td>103,751</td> </tr> <tr> <td>Croydon Transfer Station</td> <td>641</td> <td>12,400</td> <td>19,529</td> <td>27,799</td> <td>32,448</td> <td>32,448</td> </tr> <tr> <td>H C L House</td> <td>-</td> <td>485</td> <td>9,566</td> <td>8,255</td> <td>6,862</td> <td>9,566</td> </tr> <tr> <td>Kimpton Park Way H R R C</td> <td>13,395</td> <td>13,052</td> <td>13,912</td> <td>14,799</td> <td>13,977</td> <td>14,799</td> </tr> <tr> <td>Raven Recycling</td> <td>4,661</td> <td>4,739</td> <td>9,601</td> <td>15,224</td> <td>12,933</td> <td>15,224</td> </tr> <tr> <td>Therapia Lane, Croydon</td> <td>29,453</td> <td>26,205</td> <td>-</td> <td>-</td> <td>-</td> <td>29,453</td> </tr> <tr> <td>Viridor Recycling Centre</td> <td>-</td> <td>89,907</td> <td>78,781</td> <td>-</td> <td>69,054</td> <td>89,907</td> </tr> <tr> <td>Unit 4 Beddington Lane</td> <td>-</td> <td>-</td> <td>741</td> <td>916</td> <td>729</td> <td>916</td> </tr> <tr> <td>Grand Total</td> <td>1,265,165</td> <td>1,131,150</td> <td>1,193,166</td> <td>1,258,403</td> <td>1,690,559</td> <td>1,777,559</td> </tr> </tbody> </table>	Site	2014	2015	Year			5 year peak				2016	2017	2018		Croydon WPA	326,990	327,822	281,122	250,710	253,709		56-58 Factory Lane	-	8,230	14,253	1,409	-	14,255	64 Northwood Rd, Thornton Heath	6,198	6,795	8,206	9,294	8,855	9,294	Able Waste Services Ltd	2,247	15,317	32,689	46,463	56,699	56,699	Croydon Car Spares, Aurelia Rd	222	176	157	128	-	222	Day Aggregates Purley Depot	196,400	179,300	118,650	113,171	76,195	196,400	Factory Lane Special Waste Transfer Station	14,590	17,383	19,736	16,614	14,013	19,736	Fishers Farm	5,330	6,572	6,895	6,466	5,569	6,895	Henry Woods Waste Management Ltd	15,183	11,658	8,150	9,815	13,025	15,183	New Era Assets Limited	-	-	-	-	14,577	14,577	New Era Metals	2,528	2,355	3,041	4,213	4,272	4,272	Purley Oaks Civic Amenity Site	6,661	7,698	9,099	9,028	8,853	9,099	Purley Oaks Depot	6,252	13,533	-	-	-	13,533	SafetyKleen Coulsdon	884	731	963	748	727	963	Sam Smith, Peartree Fm, Addington	48,755	48,799	59,282	33,360	44,600	59,282	Stubbs Mead Depot	21,740	9,276	-	-	6,325	21,740	Kingston Upon Thames WPA	84,018	81,268	80,145	82,015	76,829		Genuine Solutions Group Limited	682	342	235	317	172	682	Kingston Civic Amenity Site	14,363	13,443	13,437	13,401	12,073	14,363	Kingston Waste Transfer Station	68,974	67,484	66,473	68,297	64,584	68,974	Merton WPA	660,334	546,646	671,585	727,028	773,812		32 Willow Lane	11,055	-	19,146	38,738	56,920	56,920	77 Weir Road	23,681	48,687	43,151	18,654	16,811	48,687	B & T @ Work	1,004	2,455	2,833	3,729	2,743	3,729	B Nebbett & Son Limited	65,200	10,333	64,375	65,050	57,748	65,200	Garth Road Civic Amenity Site	11,867	11,516	14,594	11,800	11,496	14,594	Garth Road Transfer Station	11,146	8,278	13,628	18,839	22,642	22,642	George Killoughery Limited (Mitcham)	37,334	7,774	33,360	32,853	23,477	37,334	Japanese Direct Ltd	26	60	-	-	-	60	L M D Waste Management Limited	-	3,692	14,503	24,444	38,459	38,459	Maguire Skips	28,616	16,626	29,718	58,150	67,719	67,719	Mitcham Transfer Station	286,485	234,541	190,320	205,945	227,326	286,485	Mitcham Waste Treatment Centre	42,474	43,428	44,481	43,507	48,135	48,135	Morden Transfer Station	36,387	30,340	39,950	39,817	36,147	39,950	Unit 7, Abbey Industrial Estate	5	51	62	141	144	144	Weir Road Waste Transfer Station	31,770	49,221	45,415	53,333	46,027	53,313	Riverside AD Facility	-	7,360	44,585	46,341	51,012	51,012	Unit 6, Weir Road,	73,285	71,595	70,661	65,055	66,914	73,285	Unit 3-5, 39 Willow Lane	-	688	804	651	93	804	Sutton WPA	193,823	175,414	160,313	198,650	586,209		124 Beddington Lane	-	-	-	1,060	1,100	1,100	777 Group Headquarters And Depot	83	119	142	-	-	142	777 Recycling Centre	45,614	28,507	28,041	26,846	27,034	45,614	Commercial In confidence	99,977	-	-	103,751	-	103,751	Croydon Transfer Station	641	12,400	19,529	27,799	32,448	32,448	H C L House	-	485	9,566	8,255	6,862	9,566	Kimpton Park Way H R R C	13,395	13,052	13,912	14,799	13,977	14,799	Raven Recycling	4,661	4,739	9,601	15,224	12,933	15,224	Therapia Lane, Croydon	29,453	26,205	-	-	-	29,453	Viridor Recycling Centre	-	89,907	78,781	-	69,054	89,907	Unit 4 Beddington Lane	-	-	741	916	729	916	Grand Total	1,265,165	1,131,150	1,193,166	1,258,403	1,690,559	1,777,559	
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Morden Transfer Station	36,387	30,340	39,950	39,817	36,147	39,950																																																																																																																																																																																																																																																																																																																																																																																								
Unit 7, Abbey Industrial Estate	5	51	62	141	144	144																																																																																																																																																																																																																																																																																																																																																																																								
Weir Road Waste Transfer Station	31,770	49,221	45,415	53,333	46,027	53,313																																																																																																																																																																																																																																																																																																																																																																																								
Riverside AD Facility	-	7,360	44,585	46,341	51,012	51,012																																																																																																																																																																																																																																																																																																																																																																																								
Unit 6, Weir Road,	73,285	71,595	70,661	65,055	66,914	73,285																																																																																																																																																																																																																																																																																																																																																																																								
Unit 3-5, 39 Willow Lane	-	688	804	651	93	804																																																																																																																																																																																																																																																																																																																																																																																								
Sutton WPA	193,823	175,414	160,313	198,650	586,209																																																																																																																																																																																																																																																																																																																																																																																									
124 Beddington Lane	-	-	-	1,060	1,100	1,100																																																																																																																																																																																																																																																																																																																																																																																								
777 Group Headquarters And Depot	83	119	142	-	-	142																																																																																																																																																																																																																																																																																																																																																																																								
777 Recycling Centre	45,614	28,507	28,041	26,846	27,034	45,614																																																																																																																																																																																																																																																																																																																																																																																								
Commercial In confidence	99,977	-	-	103,751	-	103,751																																																																																																																																																																																																																																																																																																																																																																																								
Croydon Transfer Station	641	12,400	19,529	27,799	32,448	32,448																																																																																																																																																																																																																																																																																																																																																																																								
H C L House	-	485	9,566	8,255	6,862	9,566																																																																																																																																																																																																																																																																																																																																																																																								
Kimpton Park Way H R R C	13,395	13,052	13,912	14,799	13,977	14,799																																																																																																																																																																																																																																																																																																																																																																																								
Raven Recycling	4,661	4,739	9,601	15,224	12,933	15,224																																																																																																																																																																																																																																																																																																																																																																																								
Therapia Lane, Croydon	29,453	26,205	-	-	-	29,453																																																																																																																																																																																																																																																																																																																																																																																								
Viridor Recycling Centre	-	89,907	78,781	-	69,054	89,907																																																																																																																																																																																																																																																																																																																																																																																								
Unit 4 Beddington Lane	-	-	741	916	729	916																																																																																																																																																																																																																																																																																																																																																																																								
Grand Total	1,265,165	1,131,150	1,193,166	1,258,403	1,690,559	1,777,559																																																																																																																																																																																																																																																																																																																																																																																								
			<p>This Table indicates that total peak throughput for the Plan area of intermediate sites that were operational between 2014 and 2018 amounted to 1.8 million tonnes of capacity. This is far in excess of the assumed</p>																																																																																																																																																																																																																																																																																																																																																																																											

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			<p>capacity in the Plan and therefore demonstrates there is sufficient surplus capacity, to allow safeguarding not to be applied to all sites, and specifically not to sites S5 and S11.</p> <p>In addition, the approach to assessing potential for intensification/expansion is neither transparent nor logical, and under-estimates the potential for increasing throughput. To illustrate the lack of logic, the assessment for sites located in Croydon has been re evaluated and outcome presented in Table 2 below. It illustrates how inconsistently sites have been assessed and capacity potential at existing sites underestimated.</p> <p>It should be noted that the potential suggested in our analysis is purely based upon 'best in class' identified within the population of sites assessed in Croydon by way of example. An alternative approach would be to apply a throughput per hectare factor to assess potential. We note that the Technical Report applies a factor of 60,000 tpa/hectare to assess land requirement, which is itself an average rather than reflecting 'best in class', and yet does not then extend this to assessment of potential of existing sites. If it were to have done so the potential for capacity offered by intensification at existing sites would be considerably greater. Similarly a factor of 100,000tpa/ha could be applied for sites dealing with C, D & E waste (see page 29 of the Technical Report).</p>	<p>The potential for intensification comes from two sources. The Technical report's assessment of whether a site is operating at maximum capacity and conversations with site owners themselves, see The Deliverability of Sites report.</p> <p>The Councils considers its approach is consistent with the GLA, who advocate an average over a period of years approach, not peak throughput.</p>

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			<p>Table 2. Review of consideration of potential for intensification of sites in Croydon</p> <table border="1"> <thead> <tr> <th>Facility Type</th> <th>Site Number</th> <th>Site Name</th> <th>Area</th> <th>Max throughput</th> <th>t/ha</th> <th>Plan Rating Potential</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>CDEW</td> <td>C1</td> <td>Able Waste Services</td> <td>0.45</td> <td>46,463</td> <td>103,251</td> <td>Poor</td> <td></td> </tr> <tr> <td>CDEW</td> <td>C4</td> <td>Days Aggregates</td> <td>2</td> <td>179,300</td> <td>89,650</td> <td>Poor due to shared use</td> <td></td> </tr> <tr> <td>HCI</td> <td>CSA</td> <td>Factory Lane WTS</td> <td>1.2</td> <td>19,736</td> <td>16,447</td> <td>Yes - site is large but no plans</td> <td></td> </tr> <tr> <td>HCI</td> <td>CSB</td> <td>Factory Lane HWRC</td> <td>0.4</td> <td>19,736</td> <td>49,340</td> <td>Yes - site is large but no plans</td> <td>This site is actually smaller than C1 which was assessed to have little potential but is considered to be large</td> </tr> <tr> <td>HCI</td> <td>C6</td> <td>Fishers Farm Reuse & Recycling Centre</td> <td>0.2</td> <td>6,895</td> <td>34,475</td> <td>No - no plans</td> <td>While CSA and CSB are considered to have potential without any plans, this site is assessed to have none simply because there are 'no plans'. Comparison with 'best in class' CSB suggests additional c3,000 tpa</td> </tr> <tr> <td>HCI</td> <td>C7</td> <td>Henry Woods Waste Management</td> <td>0.7</td> <td>12,885</td> <td>18,407</td> <td>No - very constrained site</td> <td>This assessment appears to be based on assessing potential for physical expansion rather than intensification. Comparison with 'best in class' C9 suggests additional c1,500 tpa.</td> </tr> <tr> <td>HCI</td> <td>C8</td> <td>New Era Metals</td> <td>0.4</td> <td>4,213</td> <td>10,533</td> <td>No - site achieving near permitted capacity</td> <td>This assessment appears to be based solely on permitted capacity rather than potential for physical expansion or intensification. 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Comparison with 'best in class' C5B t/ha shows throughput might be increased albeit marginally c800tpa.</td> </tr> <tr> <td>Haz</td> <td>C11</td> <td>Safety Kleen</td> <td>0.3</td> <td>12,782</td> <td>42,607</td> <td>Yes - site is vacant</td> <td>No apparent attempt at assessing actual potential has been made.</td> </tr> <tr> <td>HCI</td> <td>C12</td> <td>Stubbs Mead Depot</td> <td>2.7</td> <td>24,383</td> <td>9,031</td> <td>Yes - site is vacant but no return since 2015</td> <td>No attempt at assessing actual potential has been made. Comparison with 'best in class' CSB suggests additional c125,000 tpa. Return was made in 2018.</td> </tr> <tr> <td>HCI</td> <td>C13</td> <td>Solo Wood</td> <td>0.2</td> <td>5,000</td> <td>25,000</td> <td>No. The site is small and has little scope for intensification.</td> <td></td> </tr> </tbody> </table> <p>Policy WP3 safeguards all existing waste sites identified in the site schedules regardless of their actual need, viability or suitability and appropriateness. This evidence demonstrates that there is both an overestimate of need as a consequence of the flaws identified and a larger excess of capacity than indicated in the Plan. Therefore, safeguarding of all of the existing sites as proposed in the Plan is neither necessary nor justified.</p> <p>The Policy, and Strategy, are therefore not positively prepared, not justified, and not effective (as it would be almost impossible to deliver the requirements to overcome safeguarding – as demonstrated in our representations on Policy WP4).</p> <p>The safeguarding of all the sites as currently proposed in the Plan, applies a severe and unnecessary constraint to use of land within the Plan area for non-waste commercial and industrial purposes, impeding the free operation of the land market and its ability to respond to evolving and ever changing needs. Recent measures taken to extend permitted development rights for change of use (encompassed in the new Class E) signals the direction in</p>	Facility Type	Site Number	Site Name	Area	Max throughput	t/ha	Plan Rating Potential	Comment	CDEW	C1	Able Waste Services	0.45	46,463	103,251	Poor		CDEW	C4	Days Aggregates	2	179,300	89,650	Poor due to shared use		HCI	CSA	Factory Lane WTS	1.2	19,736	16,447	Yes - site is large but no plans		HCI	CSB	Factory Lane HWRC	0.4	19,736	49,340	Yes - site is large but no plans	This site is actually smaller than C1 which was assessed to have little potential but is considered to be large	HCI	C6	Fishers Farm Reuse & Recycling Centre	0.2	6,895	34,475	No - no plans	While CSA and CSB are considered to have potential without any plans, this site is assessed to have none simply because there are 'no plans'. 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Comparison with 'best in class' C5B t/ha shows throughput might be increased albeit marginally c800tpa.	Haz	C11	Safety Kleen	0.3	12,782	42,607	Yes - site is vacant	No apparent attempt at assessing actual potential has been made.	HCI	C12	Stubbs Mead Depot	2.7	24,383	9,031	Yes - site is vacant but no return since 2015	No attempt at assessing actual potential has been made. Comparison with 'best in class' CSB suggests additional c125,000 tpa. Return was made in 2018.	HCI	C13	Solo Wood	0.2	5,000	25,000	No. The site is small and has little scope for intensification.		<p>The Councils consider It is necessary to safeguard all the sites to get the surplus/meet the apportionment and to give flexibility to deal with an unexpected eventualities.</p> <p>The compensatory capacity needs to be provided in the plan area to maintain the waste capacity of the area.</p>
Facility Type	Site Number	Site Name	Area	Max throughput	t/ha	Plan Rating Potential	Comment																																																																																																					
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			<p>which Government is moving in terms of removing obstacles to facilitate flexibility and thereby enable economic development and for business to operate and adapt. The draft Plan recognises (para 3.21 and 5.25) there is high demand for business and industrial land in the Plan area, particularly Sutton, and sterilisation of land by applying waste designations too widely is to be avoided if a diverse and robust business base is to be supported.</p> <p>In applying stringent safeguarding requirements and constraints, it would disproportionately reduce flexibility for change of use and re-development of sites that are not viable or appropriate as a waste use. This also hinders delivery of broader planning objectives for the area as set out in the Sutton Local Plan (2018) particularly regarding economic development and employment land (Policy 14) and improvement of the industrial environment and use (Policy 15).</p> <p>In accordance with the plan-led approach to reviewing safeguarding stipulated in the London Plan, the sites proposed for safeguarding ought to be rationalised so as not to apply overly-restrictive constraints to possible development for non-waste uses to deliver broader economic and development objectives where their current use may no longer be viable or desirable.</p> <p>Two sites to which this would apply are S5 and S11.- See site safeguarding for further information</p> <p>Changes Necessary Amendments to the evidence base, including Figures 13 and 15, demonstrating a larger surplus of existing waste management capacity available to manage forecast arisings/needs.</p> <p>Deletion of Site S5 from the schedule of sites to be safeguarded. Deletion of Site S11 from the schedule of sites to be safeguarded.</p>	
64.	Con40: SUEZ	Unsound – Not effective	Policy WP3 (d) states: <i>"Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted."</i>	Disagree. The draft SLWP approach is appropriate as the plan demonstrates that it can meet its apportionment. The

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			<p>While SUEZ notes the accompanying text at paragraph 5.25 and the demand for industrial land in South London, we would highlight that there are rare occasions, such as our current strategy to relocate from Mitcham to Sutton, which are defined by the availability and market for suitable plots of land. If the replacement site for Benedict Wharf had not been available in the SLWP area, but within another Waste Plan, there should be sufficient flexibility to do so on a regional basis, where there are demonstrable benefits.</p> <p>The text at paragraph 9.8.10 of the London Plan (Intend to Publish Version December 2019) was designed to ensure that sites that have already been compromised or could otherwise be released to fulfil wider strategic objectives are not frustrated by the availability of land or sites in those specific waste plan areas. Planning Practice Guidance even highlights that authorities surrounding London may need to accept London's waste. (Paragraph: 044 Reference ID: 28-044-20141016).</p>	<p>Councils should not be required to accommodate new sites, not providing compensatory provision, when they have such a pressing need for industrial land for other industrial uses and already planning for 13% than their collective arisings. It should also be noted that a number of sites, as set out in Appendix 2 of the draft SLWP, have capacity for intensification, which potential could provide additional capacity on existing sites. Since the GLA's apportionment figures can be met on existing sites, and there is no justification for accommodating further sites which could be sterilised for other industrial uses.</p> <p>The Councils industrial land evidence base, prepared in support of Local Plans, all indicate a shortage of industrial land. The Croydon Technical Report on Employment (2017) noted a tight industrial land market with the only release possible being some scattered employment sites adjoining residential areas. The Merton Employment and Economic Land Study (2010) came to the</p>

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				same conclusion. The Kingston Economic Analysis Study (2014) noted a very tight industrial land market with no scope for release. The Sutton Town Centre and Economic Development Assessment (2015) noted an extremely tight labour. Consequently, the London Industrial Land Demand Study (2017) which advised Sutton as a “provide” borough and Croydon, Kingston and Merton as “retain” boroughs came as no surprise. Given the industrial demand, the Councils consider that encouraging additional sites that were not for compensatory provision would not be appropriate and it could have the effect of sterilising these sites for other industrial uses.
65.	Con42: Viridor	Unsound – Not Positively prepared, Not justified, Not effective	<p>Para 5.24 – It should be recognised that intensification of existing sites is not only where waste capacity it increased, but also where infrastructure is required to improve an existing facility and its operations. Often, such need are best facilitated through extensions to the existing site.</p> <p>WP3 (a) - We support the safeguarding of all existing waste sites. This includes the site identified as Site S2 – Beddington Farmlands Energy Recovery Facility, Beddington Waste Management Facility. We object to the area as outlined in red on page 80, which includes the ERF and Gas plant but excludes the Recycling Centre. The Recycling Centre benefits from a temporary planning permission for use until 2022 and for the site to be restored by the end of 2023.</p>	<p>The Councils note the temporary planning permission for the Recycling Centre until 2022 and the requirement for the site to be restored by 2023 As this only has temporary planning permission, with a clear end date and plan for</p>

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			<p>These dates are linked to a Recycling Contract with the South London Waste Partnership. The 2019 ItP London Plan states ‘waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London...’. Accordingly, this facility should be protected until the Partnership have undertaken a procurement process for the future of this contact and the waste associated with it. In addition, we are unclear why the access road is included as part of the Site.</p> <p>Our other comments on the way Site S2 is presented is as follows:</p> <ul style="list-style-type: none"> • The title of the site needs to recognise that it is not just an ERF, but also a Transfer Facility. • The “types of waste accepted” should be in line with the permit for the site. • The 275,000tpa also needs to be changed to reflect these points. • This site is currently safeguarded in the adopted SLWP as Site 18. We are unclear why it states ‘No’ against current protection. • <p>WP3 (b) Although intensification of existing sites is encouraged, extensions of existing sites should also be preferred over new separate sites. This ought to be the case especially if it means a more efficient land-take when compared with separate sites. Again, the emerging plan should consider including criteria-based policies under which future waste management facilities can be appropriately guided and subsequently assessed.</p> <p>WP3 (c) We support the need for compensatory provision for existing waste sites. It is unclear whether this applies to sites which have temporary permissions.</p>	<p>restoration post 2022, the Council do not consider it should be safeguarded.</p> <p>As stated the site is located within Metropolitan Open Land, Metropolitan Green Chain, and Site of Interest for Nature Conservation. Furthermore the site <u>does</u> fall within the areas designated as the part of the ‘Wandle Valley Regional Park’, as set out on Sutton’s adopted Policies Map (Please see Local Plan Appendices Map 5.27 on page 117).</p> <p>MOL in this locality was discussed and debated extensively during the Sutton Local Plan EiP in 2017. This resulted in the piece of land immediately to the east being released to meet industrial need. The rest of the land, including the land subject to this representation, remains in MOL.</p> <p>As stated the recycling centre is to be restored in accordance with the approved Restoration Management Plan and, as clarified above, the land falls within areas designated as the Wandle Valley Regional Park,</p>

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				<p>as set out on Sutton adopted Policies Map. The Council expects this restoration to be completed in accordance with the restoration plan.</p> <p>The 275,000tpa refers to the waste treated on site, the waste transfer station is for waste transfer.</p> <p>The Councils agree that under the current adopted waste plan the site boundary that is safeguarded covers a slightly wider area. However, the draft Plan proposes a different boundary that reflects the completion of the ERF and other policies of the Sutton Local Plan, such as MOL and the Wandle Valley Regional Park.</p>
Policy WP4: Sites for Compensatory Provision				
66.	Con1: The Mayor of London	Non-conformity	<p>Waste sites outside industrial areas</p> <p>Draft Policy WP4 (b) would restrict new waste sites to Strategic Industrial Locations (SIL) or Locally Significant Industrial Locations (LSIS). While the ItP London Plan suggests that SIL/LSIS are suitable locations for managing waste apportionments in Policy SI8B, the policy is not intended to restrict waste uses to these locations and we would encourage amendments to be made to Policy WP4 (b) that allow greater flexibility for the delivery of waste uses outside of these areas. As currently worded, Policy WP4 (b) would prevent waste sites being permitted in non-designated industrial areas or new industrial areas that may come forward (such as redeveloped retail parks) and may prevent the optimum use of land. Some waste treatment</p>	<p>Draft Policy WP4 (b) is consistent with London Plan Policy SI8 B(4), which state the development plans should:</p> <p><i>(4) identify the following as suitable locations to manage borough waste apportionments:</i></p>

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			<p>facilities (particularly those at the higher levels of the waste hierarchy) may be suitable for colocation with other uses outside of industrial areas.</p> <p>The issues of strong demand for land outside of industrial areas for uses such as housing and social infrastructure is noted, however this could be addressed positively through site allocations rather than overly restricting a use that is important for the successful and sustainable functioning of London as a city. The issue of sensitivity to waste uses is a valid concern but one that can be adequately mitigated through implementation of draft Policy WP5 and other policies in borough local plans and the London Plan.</p>	<p><i>a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity</i></p> <p><i>b) Strategic Industrial Locations and Locally Significant Industrial Sites</i></p> <p><i>c) safeguarded wharves with an existing or future potential for waste and secondary material management”.</i></p> <p>The Mayor’s representation, that the draft Plan should allow for waste sites outside of those areas, is contrary to his own policy. Furthermore, the Councils do not consider that the policy would restrict in principle compensatory provision being provided on newly designated industrial sites. Newly designated industrial sites (such as former retail parks) would be designated as either SILs or LSILS, which would be acceptable under draft Policy WP4 (b), which in turn is consistent with London Plan Policy S18 B(4).</p>
67.	Con35: 777 Demolition & Haulage	Unsound – Not Positively prepared, Not	Policy WP4 and the supporting text appears to apply only to provision of ‘new’ waste sites for compensatory provision. This appears to be a less flexible and deliverable approach to that set out in the London Plan, which	The draft SLWP approach is appropriate as the draft SLWP demonstrates that it can meet

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		justified, Not effective	<p>provides for compensatory capacity to be provided through 'intensification of existing sites'(paragraphs 9.8.9 & 9.8.11 supporting Policy SI9).</p> <p>The flexibility provided by the London Plan, in terms of compensating for the loss of safeguarded capacity through intensification of existing sites within London, is important to delivery of the policy intention of making best use of existing sites and of broader policy objectives including for much needed industrial capacity, especially in Sutton (as acknowledged in paragraphs 3.21 and 5.25 of the Plan).</p> <p>The Plan and the supporting Technical Paper demonstrate that there is excess capacity at existing sites to manage forecast waste arisings. Our analysis shows that this surplus is actually substantially under-estimated.</p> <p>The Policy, and Strategy, are therefore not positively prepared, not justified, and not effective (as it would be virtually impossible to deliver the requirements to overcome safeguarding requirements through identifying and securing 'new' waste sites prior to release of a currently safeguarded site).</p> <p>The Policy should explicitly provide for compensatory capacity for loss of safeguarded waste sites to be provided through reconfiguration and intensification of existing waste management sites, as well as provision of new sites.</p> <p>This is required to provide sufficient flexibility to enable justified loss of some safeguarded sites to deliver broader policy goals, particularly economic and industrial development and release of land for these purposes, particularly in Sutton. It would also properly reflect the large amount of safeguarded capacity that existing sites already offer, and the potential for operational capacity to be increased at a number of these sites.</p> <p>The Plan production process ought to be used as the opportunity to review and rationalise the sites that are to be safeguarded in the Plan, as not all are required to deliver the capacity needs forecast over the Plan period.</p>	<p>its apportionment. The Councils should not be required to accommodate new sites, not providing compensatory provision, when they have such a pressing need for industrial land for other industrial uses and already planning for 13% than their collective arisings. It should also be noted that a number of sites, as set out in Appendix 2 of the draft SLWP, have capacity for intensification, which potential could provide additional capacity on existing sites. Since the GLA's apportionment figures can be met on existing sites, and there is no justification for accommodating further sites which could be sterilised for other industrial uses.</p> <p>The Councils industrial land evidence base, prepared in support of Local Plans, all indicate a shortage of industrial land. The Croydon Technical Report on Employment (2017) noted a tight industrial land market with the only release possible being some scattered employment sites adjoining residential areas. The Merton Employment and Economic</p>

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			<p>The London Plan (Paragraph 9.9.2 supporting Policy SI8 & SI9) advises that such reviews should be part of a plan-led process.</p> <p>Given the low throughput of Site S1 over the last 5 years, which reflects and is a function of the waste management capacity in Sutton and wider the Plan area exceeding requirements and associated lack of demand, Site S1 should be removed from safeguarding and deleted from the Plan.</p>	<p>Land Study (2010) came to the same conclusion. The Kingston Economic Analysis Study (2014) noted a very tight industrial land market with no scope for release. The Sutton Town Centre and Economic Development Assessment (2015) noted an extremely tight labour. Consequently, the London Industrial Land Demand Study (2017) which advised Sutton as a “provide” borough and Croydon, Kingston and Merton as “retain” boroughs came as no surprise. Given the industrial demand, the Councils consider that encouraging addition sites that were not for compensatory provision would not be appropriate and it could have the effect of sterilising these sites for other industrial uses.</p> <p>London Plan Policy SI 8 (A) – “new waste management sites should be provided where required”. Given that the Councils are more than doing its bit by managing 13% more waste than it produces, that this can be met on existing sites, with potential for intensification on some sites to provide some flexibility over the plan period,</p>

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				<p>the Councils do not consider that “new sites” are “required”.</p> <p>The Council’s note paragraph 9.9.2 supporting Policy S18 & S19 of the London Plan. The Councils have considered the release of sites through the plan-led process and do not propose to safeguard Site C2, which is a tiny transfer station that does not contribute to any throughput, and K1 which has a temporary use. Site S1, in comparison, provides 53,597 tpa of qualifying throughput.</p>
68.	Con36: Spaces4 Work (BPP Consulting agent)	Unsound – Not positively prepared, Not justified, Not effective	<p>Policy WP4 and the supporting text appears to apply only to provision of ‘new’ waste sites for compensatory provision. This appears to be a less flexible and deliverable approach to that set out in the London Plan, which provides for compensatory capacity to be provided through ‘intensification of existing sites’ (paragraphs 9.8.9 & 9.8.11 supporting Policy S19).</p> <p>The flexibility provided by the London Plan, in terms of compensating for the loss of safeguarded capacity through intensification of existing sites, is important to delivery of the policy intention of making best use of existing sites and of broader policy objectives including for much needed industrial capacity, especially in Sutton (as acknowledged in paragraphs 3.21 and 5.25 of the Plan).</p> <p>The Plan and the supporting Technical Paper demonstrate that there is excess capacity at existing sites to manage forecast waste arisings. This analysis shows that this surplus is actually substantially under-estimated and the predicted need over estimated.</p> <p>The Policy, and Strategy, are therefore not positively prepared, not justified, and not effective (as it would be virtually impossible to deliver the</p>	<p>The draft SLWP Policy WP3 (b) allows for the intensification of existing sites and Draft Policy WP4 (c) requires consider of the co-location of waste facilities. As such the Councils do not consider this is ruled out.</p>

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			<p>requirements to overcome safeguarding requirements through identifying and securing 'new' waste sites prior to release of a currently safeguarded site).</p> <p>The Policy should explicitly provide for compensatory capacity for loss of safeguarded waste sites to be provided through reconfiguration and intensification of existing waste management sites, as well as provision of new sites.</p> <p>This is required to provide sufficient flexibility to enable justified loss of some safeguarded sites to deliver broader policy goals, particularly economic and industrial development and release of land for these purposes, particularly in Sutton. It would also properly reflect the large amount of safeguarded capacity that existing sites already offer, and the potential for operational capacity to be increased at a number of these sites.</p> <p>The Plan production process ought to be used as the opportunity to review and rationalise the sites that are to be safeguarded in the Plan, as not all are required to deliver the capacity needs forecast over the Plan period. The London Plan (Paragraph 9.9.2 supporting Policy SI8 & SI9) advises that such reviews should be part of a plan-led process.</p> <p>Deletion of Site S5 from the schedule of sites to be safeguarded. Deletion of Site S11 from the schedule of sites to be safeguarded.</p>	

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69.	Con38: Surrey County Council	Unsound - Not effective	In Policy WP4, part (d), it is considered that the meaning of the phrasing “have particular regard to” is ambiguous and does not make clear that proposals on sites which meet the criteria under “(d)” will be preferred. In the interest of making this policy effective and clear and to improve deliverability, the wording could be amended as follows: “Proposals for new waste sites to provide compensatory provision should: (a) should... (b) should... (c) <i>should ...</i> (d) <i>have particular regard to are preferred at sites which: ...</i> (e) should... ”	Noted. However, the Councils consider the existing wording of the policy is clearer and do not consider that the suggested wording would improve deliverability.
70.	Con42: Viridor	General comment	Clarification is needed on the impact of this emerging policy on existing temporary waste sites in the SLWP area.	Noted. The draft SLWP doesn't include capacity from temporary sites. It is not clear from the representation what action is expected?
Policy WP5: Protecting and Enhancing Amenity				
71.	Con37: Environment Agency	Support and suggestions	Following our feedback on these key issues we welcome the addition to Policy WP5 to reference “(viii) The safety and security of the site” to cover Fire Prevention measures and adequate space on site for clear pedestrian access / movement routes and space for waste vehicles to move safely around the site. The supporting text or any future design guidance could explain these key issues at waste management sites in more detail. We welcome the supporting text and plan policies (WP5 and WP6) and are keen to identify and prioritise any sites requiring joint enforcement action at poor performing waste sites across the plan area and developing joint actions.	Noted. Noted. The Councils would welcome collaborative working with the EA on poorly performing sites.

Rep No	Con No	Type of Representation	Representation	Comment
			<p>We welcome the policies to protect and enhance amenity and deliver sustainable construction across waste management sites.</p> <p>WP5 Protecting and Enhancing Amenity <i>Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.</i></p> <p><i>The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.</i></p>	<p>Noted.</p> <p>Noted.</p>
72.	Con37: Environment Agency	Support and suggestions	<p>It's essential that standards of infrastructure are improved, especially if small constrained sites are managing high volumes of waste without the right high quality supporting infrastructure in place. We recommend ongoing monitoring of the policy WP5 on the enclosure of waste sites, which should be applied to all the current allocated waste management sites, in addition to any compensatory or intensified sites.</p> <p>As explained in our previous responses and meetings, it is not just about "enclosing" waste sites but also about ensuring the supporting infrastructure is designed and operated to a high standard to prevent any issues such as dust, fire risk, mud, noise, drainage issues and reduce any issues to workers and other local businesses and residents.</p> <p>We are also keen to ensure enclosure is within a quality building informed by the latest standards and not temporary scaffolding and plastic structures as shown on page 8 in the latest plan. We recommend the photo is removed. The plan could be strengthened by including some photographs of good practice examples of quality waste management sites.</p>	<p>Noted. The draft SLWP sets out a monitoring table in Appendix 1, which includes an indicator on fully enclosed covered buildings. Whilst Policy WP5 will be applied to all new planning applications submitted to the boroughs, it cannot be applied retrospectively to sites that already have planning permission.</p> <p>Agree. The Councils will remove the image on page.</p>
73.	Con40: SUEZ	Unsound – Not justified, Not effective	<p>Part (b) of Policy WP5 states: <i>"The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building."</i></p> <p>Within our representations on the SLWP Issues and Preferred Options Consultation, we highlighted that <i>"it may not be necessary or appropriate for this policy to be applied to all development. Most industrial facilities benefit from the use of operational yard space for storage and waste, recycling and resource management operations are no different in character. Many SUEZ</i></p>	<p>Noted</p>

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			<p><i>facilities around the UK store either baled or loose recovered product externally in advance of transport to a re-processor.”</i></p> <p>SUEZ notes the officer response that this policy in the current SLWP is considered to have significantly reducing the amenity complaints from adjoining properties. However, we would maintain that such a blanket policy is restrictive when most industrial type facilities require not only on buildings but operational yard space – this is recognised within paragraphs 6.4.6 and 6.4.7 in the Intend to Publish London Plan:</p> <p><i>“6.4.6 When applying the principle of no net loss of industrial floorspace capacity regard should be given to the characteristics and operational requirements of the different industrial uses set out in Part A. Yard space is an essential requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed.</i></p> <p><i>6.4.7Some industrial uses may require a significant amount of yard and servicing space...”</i></p> <p>SUEZ understands that there will be occasions where external unloading and processing is unacceptable, however, on many sites there would be no significant amenity impacts associated with external storage, for example the external storage and loading of baled recovered materials. Part c of policy WP5 already contains protection against amenity impacts without a blanket restriction on all yard-based operations.</p>	<p>Noted. However, the London Plan Policies referred to are directed towards industrial developments not waste developments, which are professing entirely different types of material. It should also be noted that this is a continuation of Policy WP7 of the adopted South London Waste Plan (2012), which states “A waste facility should be within a fully enclosed covered building.”. This is a continuation of a policy the Council consider have worked well over the last 10 years.</p>
74.	Con44: Historic England	Unsound - Not Consistent with National Policy	We would refer you again to the points made in our previous letter – namely, that the Plan and the policies within it should set out a requirement for any waste development applications to appropriately assess the	Noted. Disagree. The draft Plan now includes, under draft Policy WP5, the submission of an

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			<p>potential impacts on the historic environment and conserve those elements that contribute to the significance of heritage assets. In order to ensure the Plan is able to achieve this, we recommend the wording below (as suggested in our previous letter) is included within policy WP5. We do not consider that the requirement to pay 'particular regard' to impacts on the historic environment adequately would enable its conservation and enhancement.</p> <p><i>Waste development proposals will be permitted where it can be demonstrated that they will conserve, and where practicable, enhance those elements which contribute to the significance of the area's heritage assets including their setting.</i></p>	<p>assessment of the impact of the proposed development on the built and historic environment (where required). Furthermore, Heritage assets are covered in the "Issues to Consider" section for the sites tailored to the site's relationship with a historic asset</p> <p>The Council's do not consider that a specific policy in the draft SLWP is required. Individual borough local plans, and emerging local plans, all include unambiguous policies that ensure the historic environment is conserved and enhanced, as required by para 16 and 20 of the NPPF. The draft Plan makes clear (para 1.3) that borough local plans (along with the London Plan and any SPDs) also form part of the development plan and will be used in the decision making process for waste development applications. Therefore, the Council's do not consider it necessary to repeat policies that already exist elsewhere within the 'development plan'.</p>
75.	Con44: Historic England	Unsound - Not effective	We also note a number of previous comments in relation to archaeology have not been taken forward. To ensure an appropriate approach to	Disagree. All waste treatment applications will be considered against not only the South

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			<p>archaeological issues within the Plan, we recommend that these are included in the Plan. For completeness, the comments concerned are:</p> <ul style="list-style-type: none"> P34, item 13 states 'archaeological evaluation' – this could be improved to state 'archaeological assessment and possible evaluation'. 	London Waste Plan but also the relevant borough's Local Plan, which include specific archaeology policies or archaeology sections within an overall heritage policy.
Policy WP6: Sustainable Design and Construction of Waste Facilities				
76.	Con33: Merton Liberal Democrat Group	Unsound – Not positively prepared	<p>Decarbonisation of transport: The plan is not based on a strategy to meet need and infrastructure requirements with regards to the SLWP's transport proposals (Section 7 Key Sustainability Issues Page 96 Issue 9. Transport to reduce harmful emissions for the duration of the plan. The SLWP gives no supportive evidence of a strategy for transferring to an (electric/hydrogen) clean waste vehicle fleet from environmentally emission damaging fossil fuel reliance. There is insufficient methodology as to how journeys will reduce CO2 increases on roads and PM2.5, as more journeys will be required with the increase of predicated waste transferral. There is no inclusion of PM2.5 data, for the increase of the harmful emissions from road tyres and dust produced by waste vehicles, proven to be damaging to human and animal health. There are no inclusions of guidelines for drivers/staff for anti-idling driver training for existing emissions producing fleet vehicles or staff vehicles.</p>	Disagree. Draft Policy WP5 will require applicants, where appropriate, to submit details demonstrating how the relevant matters have been considered and where necessary, be mitigated.
77.	Con33: Merton Liberal Democrat Group	Unsound – Not positively prepared	<p>Biodiversity We are happy to accept the proposals on environmental grounds ensuring all relevant policies are adhered to.</p> <p>With regards to (Section 7. Sustainability Issues TaskA3 Issue 12 Page 98) How the plan will potentially affect local Biodiversity Action Plan Targets, this is of concern as Merton does not have a Biodiversity Strategy/Action Plan with Targets and as such exposes issues of biodiversity loss and not of gains in relation to priority habitats and species. The SWLP does not detail increasing habitats for wildlife on existing sites such as bat boxes, bee hotels, swift boxes, log piles, compost heaps, native hedge and tree planting. We are concerned to read in Section 8 SA Framework Page 106 Objective 6 Climate Change Adaptation only New or Upgraded</p>	Disagree. Draft Policy WP5 will require applicants, where appropriate, to submit details demonstrating how the relevant matters have been considered and where necessary, be mitigated.

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			management facilities (with no inclusion of retrofitting facilities) will incorporate green infrastructure such as green roofs and no mention of green walls to maximise benefits for flood risk management, urban cooling, resilience to drought, biodiversity and other climate adaptation objectives. There will be no new facilities in Merton in the Option 1 Plan therefore Merton will not get any benefits of biodiversity gain but may incur losses.	
78.	Con33: Merton Liberal Democrat Group	Unsound – Not positively prepared	<p>Climate Change Mitigation</p> <p>We raise our concerns with regards to (Section 7 Key Sustainability Issues, Issue 5 Climate Change Mitigation). The Beddington Energy Recovery Facility brings benefits from generating electricity, but this needs to be offset against its CO2 emissions. Its CO2 levels and other high polluting emissions will increase as use of the ERF will intensify up to the permitted tpa limits within the new proposals. Mitigation of CO2 levels through a carbon offset fund is not acceptable as an appropriate form of CO2 reduction to reach net zero. We are strongly opposed to any further increase to these levels and would seek to decrease these limits if at all possible. We are not convinced building of additional similar facilities would be appropriate in the future.</p>	Disagree. Policy WP7 (b) states: "Waste development for additional Energy from Waste facilities will not be supported.
79.	Con37: Environment Agency	Support and suggestions	<p>We welcome the supporting text and plan policies (WP5 and WP6) and are keen to identify and prioritise any sites requiring joint enforcement action at poor performing waste sites across the plan area and developing joint actions.</p> <p>We welcome the policies to protect and enhance amenity and deliver sustainable construction across waste management sites.</p> <p>WP6 Sustainable Construction and Design of Waste Facilities <i>Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme.</i></p> <p>We are keen to work with you to review the current infrastructure standards of waste sites across the plan area and develop some Waste Management site design guidance to support delivery of the plan policies. This could be joint guidance and cover both the planning and permitting regimes to provide waste management companies with clarity on the standards of buildings/infrastructure required. Developing a SLWP design guide would</p>	Noted.

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			<p>also assist in the delivery of the policy WP6 Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating.</p> <p>We hope our response is helpful. We look forward to continuing to work with you on delivery of the South London Waste Plan. If you have any questions or require more information please let me know</p>	
Policy WP7: The Benefits of Waste				
80.	Con11 Resident AO	Unsound – Not justified	<p>I have just read the waste planning document. The area I wish to comment on is document entitled WP7/c.</p> <p>Please can you highlight the work being done with local food business whose trade relies on paper and their contributions to disposal and how their practices help to meet local and national targets.</p> <p>Also some reference to promoting of opportunities within the waste field. Ie school job fairs examination choices for teenagers. In addition opportunities for mature job seeker, those who want a career change and inclusivity for the local retirement communities. I. 3 speaking at age uk or U3A groups</p>	<p>Noted. This is not a strategic planning matter. However, wider strategies for the reduction of waste and increase in recycling are set out in borough strategies such as Sutton Council's Waste Minimisation Strategy 2019-2026 and its Reduction and Recycling Plan, adopted in December 2019.</p> <p>Noted. Reference to job creation is already made in Policy WP7.</p>
81.	Con 20: Resident AH	General Comment	<p>We ought to be moving away from the concept of 'waste' towards 'resources'. As the plan rightly says, we need to develop a circular economy, reusing unwanted, surplus, damaged or excess items in positive and constructive ways. Although progress is being made in this direction, it is not happening as much or as quickly as it should. In the next few years, we need a much greater emphasis on moving to a fully recyclable economy.</p>	Noted.

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Policy WP8: New Development Affecting Waste Sites				
82.	Con18: Day Group Ltd (Firstplan as agent)	Support – consistent with national policy	<p>The Day Group response at Issues and Preferred Options stage highlighted the need to reflect National requirements in terms of the ‘Agent of Change Principle’.</p> <p>In this context, and in response to Question 6 of the Response Forms, it is confirmed that the introduction of new Policy WP8 within the Submission Draft SLWP is fully supported. It is required to ensure the SLWP meets the tests of soundness and specifically the requirement to be ‘consistent with National Policy’. Paragraph 182 of the NPPF is clear that: ‘Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities....Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed’.</p> <p>Policy WP8 is considered essential to ensuring the effective safeguarding of sites such as the Day Group Site (C4) identified in the SLWP. Day Group are an experienced operator of sites such as this and are fully aware of the threat posed by the introduction of new sensitive development in proximity to sites such as the Purley 6</p> <p>Depot. The Policy is considered to robustly address the overarching issues which need to be considered when new development is proposed in the vicinity of such sites. However, to maximise the prospects that new development will not prejudice, directly or indirectly, the waste function of safeguarded sites it is key that baseline assessments take fully into account all operations and potential sources of noise and disturbance. This is to ensure that new development is designed based on a full understanding of the operation of the safeguarded site -taking into account all activities and hours of operation. This is best achieved via early engagement between the developer and the waste site operator.</p>	Agree, Add to Policy WP8: “(iii) Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust”

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			<p>In response to Question 7 of the Response Form, whilst not considered sufficient to render the SLWP unsound, in light of the above it is suggested that consideration should be given to adding the following wording (shown bold and underlined) to Policy WP8 to further strengthen the protection it affords to safeguarded waste sites. This would underpin the 'effectiveness' of the plan and its 'consistency with national policy'.</p> <p>WP8 New Development Affecting Waste Sites</p> <p>(a) New development should be</p> <p>(b) Where new development is proposed that may be affected by and an existing waste site.....the applicant should:</p> <p>(i) Ensure that good design.....</p> <p>(ii) Explore mitigation measures early in the</p> <p><u>(iii) Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust.</u></p> <p>I trust this response in support of the soundness of the Submission Draft South London Waste Plan are helpful. I would be grateful for confirmation of receipt of these representations and confirmation that they have been duly made.</p>	
83.	Con19 – D B Cargo (Firstplan as Agent)	Unsound – Not positively prepared, Not justified, Not Effective, Not consistent with National Policy	<p>Please refer to accompanying Statement of Response (Ref: VW/jc/17218_16.10.20) provided on behalf of DB Cargo and dealing with interlinked response to:</p> <ul style="list-style-type: none"> • Site Safeguarding - Omission of Chessington Railhead • Policy WP2 • Policy WP3 • Policy WP8 <p>Please refer to accompanying Statement of Response (Ref: VW/jc/17218_16.10.20) provided on behalf of DB Cargo setting out the changes considered necessary to make the draft South London Waste Plan sound.</p>	Noted.

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			[Please see Appendix 3]	
84.	Con40: SUEZ	Support	SUEZ welcomes the addition of WP8 as suggested during the Issues and Preferred Options Consultation.	Noted.
Sites C1 to C13				
85.	Con44: Historic England	Factual update	For Croydon sites, the APA reference should be amended to reflect the borough APA review that means all areas of the borough are now assigned to Tiers I-IV: see https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greaterlondon-archaeological-priority-areas/	Agree to revised wording.
Site C1: Able Waste Services, 43 Imperial Way, Croydon				
86.	Con44: Historic England	Unsound: Not justified	We also note that our recommendations to identify and reference designated heritage assets in relation to sites C1 and M15 have not been taken forward. We would again stress the potential for development proposals to create adverse impacts on heritage significance through effects on setting, such as noise, vibration and dust. We therefore consider it important that nearby heritage assets are identified and assessed early in the development process in order to avoid or mitigate such impacts. We would urge that the relevant heritage assets are therefore included in the planning designation and issues to consider sections of these sites. [Representation repeated under Site M15 below]	Agree. The Councils will include a reference to Airport House within the 'Issues to Consider' section for Site C1 and will reference the proximity of the Wandle Valley Conservation Area within the 'Issues to Consider' section for Site M15.
Site C4: Days Aggregates Purley Depot, Approach Road, Croydon				
88.	Con18: Day Group Ltd (Firstplan as agent)	Support – consistent with national policy	Day Group has operated the rail served aggregates depot at Purley since the 1990's and it has been an active goods yard for much longer. This long-established facility comprises a highly sustainable source of supply to the construction industry. The Goods Yard currently accommodates around 250 train loads of construction aggregates each year. The ability to supply essential materials such as this by train keeps in the region of 30,000 long distance lorry trips (that would cover c.2 million road miles and generate 2,400 tonnes of CO2 each year) off the road network. This makes a significant contribution to reducing road congestion, CO2, particulates and nitrogen oxides emissions, as well as reducing road-risks. All of which is	Noted.

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			<p>consistent with both Croydon's and the Mayor of London's policies on transport, growth and air quality.</p> <p>These sustainably supplied construction materials are vital to supporting existing and planned redevelopment within and close to Croydon as well as other nearby infrastructure maintenance and improvements.</p> <p>Specifically, the Goods Yard is operated as follows:</p> <ul style="list-style-type: none"> • Aggregate brought in by rail is discharged from 'hopper' wagons into a covered below-ground receiving facility and then conveyed into on-site storage areas before being loaded onto HGVs as required for redistribution by road. This facility operates under permitted development rights accruing to rail sites and as such there are no restrictions on operating hours. • The long-established concrete batching plant on site uses rail supplied aggregates in its production of ready-mixed concrete. • The enclosed on-site recycling plant handles c.150,000 tonnes p.a. of locally sourced construction & demolition waste to provide aggregates for local construction projects, thereby removing the need for additional extraction and importation of primary aggregates, with all the associated environmental benefits. • There is also potential for the expansion of activities and uses on the site which, as indicated below, is supported by policy. <p>Day Group, as an experienced rail depot operator, is clear that rail served sites such as the Purley Rail Depot are a scarce resource and not easily replaced. This is because of the costs involved in creating new railhead facilities and the difficulties in securing land where appropriate access to the rail and road network can be achieved. The importance of such sites is underpinned by the protective policies found in the NPPF and London Plan.</p> <p>Relevant Policy Context</p> <p>Critical to the consideration of 'soundness' of the South London Waste Plan and how the Purley Depot Site (C4) is approached are the relevant National and London Plan policy requirements. The draft plan is clear in setting out the waste policy background and Day Group recognise that the Councils must respond to the forthcoming London Plan target of reuse/recycling/recovery of 95% of construction and demolition waste.</p>	

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			<p>However, in the case of the Purley Depot site it is also important to recognise the sites minerals function as an aggregate rail depot, which is supported by the NPPF and London Plan as follows:</p> <p>i) <u>NPPF</u> The National Planning Policy Framework (NPPF) (2019), in the context of Facilitating the Sustainable Use of Minerals, requires at Para 204(e) that:</p> <p><i>“Planning policies should</i> e) <i>Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products...”</i></p> <p>ii) <u>Draft London Plan – Intend to Publish Version (December 2019)</u> The draft London Plan, whilst not yet adopted, has reached an advanced stage and can be considered a material consideration. In December 2019, the Mayor issued to the Secretary of State an ‘Intend to Publish London Plan’. The Secretary of State responded to the Mayor in March 2020 setting out his consideration of the Plan. With a further response issued by the Mayor in April 2020.</p> <p>The key Draft London Plan policies relevant to safeguarding minerals/rail functions are detailed as follows:</p> <p>Draft Policy SI10, ‘Aggregates’, maintains the requirement in the context of plan making that development plans should:</p> <p>‘ensure sufficient capacity of aggregates wharves and aggregate rail depots is available to ensure a steady and adequate supply of imported and marine aggregate to London and maximise the movement of aggregates by sustainable modes’.</p> <p>The draft policy goes on to confirm that Council’s Development Plans should:</p>	

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			<p><i>'Identify and safeguard sites and facilities, including wharves and railheads, with existing, planned or potential capacity for transportation, distribution, processing and /or production of primary and/or secondary/recycled aggregates.'</i></p> <p>The draft policy also requires that:</p> <p><i>'development proposals should be designed to avoid and mitigate potential conflicts with sites safeguarded for the transportation, distribution, processing and/or production of aggregates, in line with the Agent of Change principle.'</i></p> <p>Draft supporting paragraph 9.10.5 acknowledges the importance of railway depots for importing crushed rock from other parts of the UK. It concludes that railheads are vital to the sustainable movement of aggregates and boroughs should safeguard them. 4</p> <p>Draft Policy T7, 'Deliveries, Servicing and Construction' has been amended in response to the Panel's recommendation and the 'Intend to Publish' version includes an additional sentence stating that 'development plans and development proposals should facilitate sustainable freight movement by rail, waterway and road'. Draft Policy T7 also places a further requirement on local authorities to safeguard railheads in plan-making.</p> <p><u>Adopted Croydon Local Plan (2018)</u> It is noted that the existence of the Purley Depot is referenced within the Adopted Croydon Local Plan. Para 10.24 confirms that "the sidings at Purley, currently occupied by an aggregates company, is an active rail freight site" and Para 11.161 confirms that "Realisation of the potential of the Warren Road railhead to transfer freight to rail will be supported".</p> <p><u>Site C4 – Days Aggregates Purley Depot, Approach Road, Croydon</u> As confirmed in the context of the Issues and Preferred Options response, Day Group do not object to their site being safeguarded for waste uses provided that the minerals function of the site is also recognised and allowed to intensify in principle should this be put forward in the future.</p>	

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			<p>The response within the SLWP Representations Schedule (May 2020) that ‘The Councils have no intention to prejudice Day Aggregates’ minerals operations and will ensure that the waste safeguarding does not hamper that side of the operation’ and that ‘The Councils note Day Aggregates’ plans for expansion’ are welcomed.</p> <p>In this context, and in response to Question 6 of the Response Forms, the amended ‘Site Description’ details for Site C4 in the Submission SLWP are supported in that they acknowledge that this is a ‘.dual use site, with minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level’.</p> <p>This amendment ensures that the Plan meets the tests of soundness in terms of being ‘consistent with national policy’ which requires safeguarding of rail served mineral uses such as those co-located with the waste use at the Purley site.</p>	
Site C5A: Factory Lane Waste Transfer Station, Factory Lane, Croydon				
88.	Con25 South London Waste Partnership	Unsound – Not positively prepared	<p>The words “There are no plans by the South London Waste Partnership to intensify operations at this site” in the description of site C5A (Factory Lane Waste Transfer Station) on page 46 of the draft Plan may well no longer be accurate. Operational necessity now requires consideration by the Partnership of the use of site C5A as a waste transfer station for receiving municipal waste, including food and green garden waste, collected from households in the South London Waste Partnership area. This change in the Partnership’s position has arisen because of the loss and shortage of other suitable and proximate waste transfer stations within the area to receive these wastes.</p> <p>In order to make the Plan sound in that it would then accurately reflect the infrastructure needs of the South London Waste Plan area, I request the deletion of the words identified in inverted commas in box 6 above [“There are no plans by the South London Waste Partnership to intensify operations at this site” in the description of site C5A (Factory Lane Waste Transfer Station)], and their replacement with the following words:</p>	<p>The Councils note that the site may now have position for intensification and will update the draft SLWP to reflect this.</p> <p>The Councils agree to delete the existing wording “There are no plans by the South London Waste Partnership to intensify operations at this site” in the description of site C5A (Factory Lane Waste Transfer Station)”. However, the Councils do not consider it necessary to add the additional wording. Not adding this additional sentence doesn’t prejudice a</p>

Rep No	Con No	Type of Representation	Representation	Comment
			“In order to ensure that it retains operational flexibility to manage wastes close to their source the South London Waste Partnership may wish to propose a reconfiguration of waste management uses on this site.”	reconfiguration taking place, and by deleting the sentence about ‘no plans’ it doesn’t imply that it won’t happen either.
Site C12: Stubbs Mead Depot, Factory Lane, Croydon				
89.	Con44: Historic England	Factual update	Site C12 Stubbs Mead Depot. Site is not identified as being in a Croydon APA (see above comment re APA review, regardless, as site is over 0.5ha, it will need archaeological consideration. See https://historicensland.org.uk/images-books/publications/charter-for-greater-london-archaeologicaladvisory-service/	Agree. The Councils will update
Site K4: Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road				
90.	Con25 South London Waste Partnership	Unsound – Not positively prepared	<p>The words “There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site” in the description of site K4 (Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston) on page 59 of the draft Plan may well no longer be accurate. Operational necessity now requires consideration by the Partnership of the use of site K4 as a waste transfer station for receiving additional quantities of municipal waste, including food and green garden waste, collected from households in the South London Waste Partnership area. This change in the Partnership’s position has arisen because of the loss and shortage of other suitable and proximate waste transfer stations within the area to receive these wastes.</p> <p>In order to make the Plan sound in that it would then accurately reflect the infrastructure needs of the South London Waste Plan area, I request the deletion of the words identified in inverted commas in box 6 above, and their replacement with the following words: “In order to ensure that it retains operational flexibility to manage wastes close to their source the South London Waste Partnership may wish to propose a reconfiguration of waste management uses on this site.”</p>	<p>Disagree. The Councils note that the position regarding intensification may have changed since publication of the draft SLWP.</p> <p>The Councils agree to delete the existing wording “There are no plans by the South London Waste Partnership to intensify operations at this site” in the description of site K4. However, the Councils do not consider it necessary to add the additional wording. Not adding this additional sentence doesn’t prejudice a reconfiguration taking place, and by deleting the sentence about ‘no plans’ it doesn’t imply that it won’t happen either.</p>
New Site in Kingston: Chessington Railhead, Garrison Lane				
91.	Con19: D B Cargo	Unsound – not justified	See Appendix 3. Representation proposes that Chessington Railhead is added as a new site.	

Rep No	Con No	Type of Representation	Representation	Comment
	(Firstplan as agent)		<ul style="list-style-type: none"> ● 1.7 DBC / Cappagh propose to operate the site as dual use minerals and waste rail transfer site... Concerns raised that as currently worded the SLWP would appear to place a policy bar on such operations if they are not on an identified 'safeguarded' waste site within the SLWP. Given the key operational and sustainability advantages of co-locating waste uses at the Chessington site – it is assumed that this would not be the intent of the SLWP. However, without changes to the Submission Draft this would be the effect of the Plan as currently drafted and this is not considered to be 'sound'. ● 1.8 Further, and more critically, DBC would be concerned to ensure their site and operations are fully 'safeguarded' not just in terms of the uses which can be progressed on the site but how development is considered in the surrounding area which could prejudice the future operation of the mineral and waste transfer site. Again, as currently worded the relevant 'agent of change' policy would only appear to apply to identified 'safeguarded' sites in the SLWP. Again, it is assumed that in the full knowledge that the Chessington Railhead is in the process of being brought forward as a dual use mineral and waste site that this would not be the intent of the Plan. Without changes to the Plan in this respect this again calls into question the soundness of the Plan. ● 2.5 Representations were made by DBC to the Kingston Local Plan review in 2019 as Kingston were at that stage considering the site for allocation for residential purposes. At that date DBC were still in the process of formally securing the site for rail freight uses, and both DBC and NR alerted LB Kingston to the fact that the site would not be available for residential purposes. In response Kingston have advised that as a result of the submissions made the site will be considered as 'unavailable' for residential development, and that the site will be safeguarded for rail freight/transport uses in the emerging new Local Plan. ● 2.12 Any development that may come forward on adjoining or nearby sites should be required to take account of the strategic importance of the Chessington Railhead site and its dual use for 	<p>The Councils note that the site was not promoted through the Reg 18 consultation.</p> <p>Whilst a lease may have been signed and the intended use for the site is set out in the reps, there is no guarantee that planning permission would be granted or even that the principle of development would be acceptable. Therefore the 'agent of change' policy is not relevant to the soundness of the Plan.</p> <p>No representations to the Kingston Local Plan were made with an intention to safeguard the site for waste use.</p> <p>This is a matter that is more relevant to the preparation of</p>

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			<p>minerals and waste transfer, to ensure it does not raise any potential to prejudice its future operation.</p> <ul style="list-style-type: none"> 4.6 As the site is confirmed as coming forward for waste transfer uses and given the above considerations there is every reason to support at minimum identification and reference of the site in the SLWP and ideally express safeguarding. Further, there should be no in principle policy bar on co-location of complementary waste management facilities. 	<p>the new Kingston Local Plan. The Chessington Railhead site is not designated as a Strategic Rail Freight Site in the adopted Kingston Policies Map and no application has been submitted for minerals and waste transfer use.</p> <p>There is no bar on co-location of waste uses. There is scope within the plan for new sites to come forward, provided that it is for compensatory provision.</p>
New Site in Kingston: Land adjacent to Site K4 , part of the Hogsmill Sewage Treatment Works				
92.	Con25 South London Waste Partnership	Unsound – Not positively prepared	<p>Recent work by the South London Waste Partnership to identify suitable and proximate facilities to realise the maximum environmental value from residents' source segregated food waste has shown that there is currently only one such facility located within the Partnership area (site M15 – Riverside AD Facility), and this does not have the capacity to treat all the food waste currently produced by residents in the Partnership area. This leads the Partnership to query whether Policy WP1(d) as currently worded is fully adequate to meet the current and future infrastructure needs of the area, in that it is possible that a new or intensified waste site may be required to house facilities for the management of food waste by anaerobic digestion in order to generate energy and an organic fertiliser for farmland.</p> <p>The Partnership notes that the western flank of the Hogsmill Sewage Treatment Works, described in paragraph 5.21 of the draft Plan, is adjacent to site K4 (Kingston Waste Transfer Station). It is the Partnership's view that the adjacency of the two sites presents an opportunity to consider the construction of an anaerobic digestion facility on this flank of the Hogsmill</p>	<p>Disagree. The draft SLWP does not prevent existing safeguarded sites from being intensified and actually encourages this in draft Policy WP1(c).</p> <p>It is also noted that the Hogsmill Sewage Treatment works is located in Metropolitan Open Land. This is not address in the representation.</p>

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			<p>site in order to provide additional proximate food waste treatment infrastructure to meet the needs of the Partnership area.</p> <p>In order to make the Plan sound in that it would then more accurately reflect the likely future infrastructure needs of the South London Waste Plan area, I request the modification of policy WP1(d) such that after the words "...compensatory provision" should be added the words "or to meet a proven need for specialist waste treatment facilities not otherwise met within the Plan area."</p> <p>I also request a modification of policy WP2(e) such that it should read: "(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. Such development may include the construction of anaerobic digestion facilities to treat municipal food waste."</p>	<p>Disagree. Specialist waste treatment can be transferred elsewhere due to the specialist nature of dealing with it.</p> <p>The Councils do not support specific technologies on specific sites.</p>
Site M6: George Killoughery, 41 Willow Lane, Merton				
93.	Con10 Wandle Valley Forum	Unsound – not justified	<p>We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the Wandle and warranting an 8m buffer for sites M6, M10, M12, M14, M15, M16.</p> <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank.</p>	<p>Noted.</p> <p>Disagree, The South London Waste Plan cannot support <u>any</u> development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications for other aspects of south London.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>We also note the inconsistency in identifying “Protecting the amenity of those using the future Wandle Valley Regional Park” as an issue to consider for site M12 but not for the other sites despite the equal significance of their location in the Wandle Valley Regional Park (M6, M10, M14, M15 and M16). This should be addressed in the final plan.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett’s Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites. We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route along the east bank of the Wandle and, where appropriate, to secure its delivery.</p>	<p>Agree. The Councils will add the reference “Protecting the amenity of those using the future Wandle Valley Regional Park” to sites M6, M10, M14, M15 and M16.</p> <p>Noted. However, it is considered that an expansion to walking routes within Merton is a matter that should come under the remit of the emerging Merton Local Plan.</p>
Site M9: Maguire Skips. Storage Yard, Wandle Way, Merton				
94.	Con16: Maguire Skips (submitted by Mr M Kelly as agent)	Support	<p>I write on behalf of my client Maguire Skips Ltd concerning the above consultation. I act as their planning agent. Their site at Wandle Way, Merton is listed as site M9 on page 69 of the current document.</p> <p>I can confirm that Maguires support the inclusion of Wandle Way as a safeguarded site under Policy WP3 Existing Waste Sites.</p> <p>I would just like to point out though that there is an inconsistency in the text with regard to the issues to consider if there is a further planning application as this specifically relates to where developers plan to intensify their safeguarded site. Yet in the section above titled ‘Opportunity to increase waste managed’ it states that there are none. However, my clients purport that this is premature as it may be the case that where future plans are drawn up they are able to maximise throughputs. Accordingly, they request that the text is changed to the following:</p>	<p>Noted.</p> <p>Agree. The Councils will accept the revised text: ‘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</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>'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.'</p> <p>I trust these comments are helpful.</p>	the appropriate environmental capacity.'
Site M10: Powerday, Weir Court, 36 Weir Road, Merton				
95.	Con2 Transport for London	Unsound – Not positively prepared	<p>The single outstanding point relates to the three proposed safeguarded waste sites located in the Weir Road Industrial Estate (M10, M12 and M14). Although these sites are not included within the Safeguarding Direction, they were identified in a 2015 consultation for use as a future worksite and depot to support Crossrail 2. It is requested that the 'issues to consider' are updated for each of these sites to include a reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.</p>	<p>Disagree. The site is outside Crossrail 2 Safeguarding Direction and according to TfL's Crossrail2 website (see extract below), the project is no longer funded. If the next government were to fund it, post 2024, it is likely to be delivered beyond the lifetime of this plan. There is therefore no evidence that these waste and industrial sites will be required to be demolished within this plan period.</p> <p>https://crossrail2.co.uk/news/crossrail2-update-november-2020/: "Given TfL's current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London's growth and we have clearly demonstrated the case for the scheme. The project has been put in good</p>

Rep No	Con No	Type of Representation	Representation	Comment
				order, ready to be restarted when the time is right"
96.	Con10 Wandle Valley Forum	Unsound – Not justified	<p>We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the Wandle and warranting an 8m buffer for sites M6, M10, M12, M14, M15, M16.</p> <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14.</p> <p>We also note the inconsistency in identifying “Protecting the amenity of those using the future Wandle Valley Regional Park” as an issue to consider for site M12 but not for the other sites despite the equal significance of their location in the Wandle Valley Regional Park (M6, M10, M14, M15 and M16). This should be addressed in the final plan.</p>	<p>Noted.</p> <p>Disagree, The South London Waste Plan cannot support <u>any</u> development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications for other aspects of south London.</p> <p>Agree. We will add the reference “Protecting the amenity of those using the future Wandle Valley Regional Park” to sites M6, M10, M14, M15 and M16.</p>
Site M11: Morden Transfer Station, Amenity Way, Morden				
97.	Con40: SUEZ	Support	SUEZ is the operator of this site and agrees that it should be safeguarded for waste uses.	Noted.
Site M12: NJB Recycling, 77 Weir Road, Merton				
98.	Con2 Transport for London	Unsound – Not positively prepared	The single outstanding point relates to the three proposed safeguarded waste sites located in the Weir Road Industrial Estate (M10, M12 and M14). Although these sites are not included within the Safeguarding Direction, they were identified in a 2015 consultation for use as a future worksite and depot to support Crossrail 2. It is requested that the ‘issues to consider’ are updated for each of these sites to include a reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.	Disagree. The site is outside Crossrail 2 Safeguarding Direction and according to TfL’s Crossrail2 website (see extract below), the project is no longer funded. If the next government were to fund it, post 2024, it is likely to be delivered beyond

Rep No	Con No	Type of Representation	Representation	Comment
				<p>the lifetime of this plan. There is therefore no evidence that these waste and industrial sites will be required to be demolished within this plan period.</p> <p>https://crossrail2.co.uk/news/crossrail2-update-november-2020/: "Given TfL's current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London's growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right"</p>
99.	Con10 Wandle Valley Forum	Unsound – Not justified	<p>We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the Wandle and warranting an 8m buffer for sites M6, M10, M12, M14, M15, M16.</p> <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14.</p>	<p>Noted.</p> <p>Disagree, The South London Waste Plan cannot support <u>any</u> development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications</p>

Rep No	Con No	Type of Representation	Representation	Comment
				for other aspects of south London.
Site M14: Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton				
100.	Con2 Transport for London	Unsound – Not positively prepared	The single outstanding point relates to the three proposed safeguarded waste sites located in the Weir Road Industrial Estate (M10, M12 and M14). Although these sites are not included within the Safeguarding Direction, they were identified in a 2015 consultation for use as a future worksite and depot to support Crossrail 2. It is requested that the 'issues to consider' are updated for each of these sites to include a reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.	Disagree. The site is outside Crossrail 2 Safeguarding Direction and according to TfL's Crossrail2 website (see extract below), the project is no longer funded. If the next government were to fund it, post 2024, it is likely to be delivered beyond the lifetime of this plan. There is therefore no evidence that these waste and industrial sites will be required to be demolished within this plan period. https://crossrail2.co.uk/news/crossrail2-update-november-2020/ : "Given TfL's current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London's growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right".
101.	Con10	Unsound-Not justified	We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the	Noted.

Rep No	Con No	Type of Representation	Representation	Comment
	Wandle Valley Forum		<p>Wandle and warranting an 8m buffer for sites M6, M10, M12, M14, M15, M16.</p> <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14.</p> <p>We also note the inconsistency in identifying “Protecting the amenity of those using the future Wandle Valley Regional Park” as an issue to consider for site M12 but not for the other sites despite the equal significance of their location in the Wandle Valley Regional Park (M6, M10, M14, M15 and M16). This should be addressed in the final plan.</p>	<p>Disagree, The South London Waste Plan cannot support <u>any</u> development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications for other aspects of south London.</p> <p>Agree. We will add the reference “Protecting the amenity of those using the future Wandle Valley Regional Park” to sites M6, M10, M14, M15 and M16.</p>
Site M15: Riverside AD Facility, 43 Willow Lane, Merton				
102.	Con10: Wandle Valley Forum	Unsound: Not justified	<p>We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the Wandle and warranting an 8m buffer for sites M6, M10, M12, M14, M15, M16.</p> <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank.</p>	<p>Noted.</p> <p>Disagree, The South London Waste Plan cannot support <u>any</u> development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications for other aspects of south London.</p>

Rep No	Con No	Type of Representation	Representation	Comment
			<p>We also note the inconsistency in identifying “Protecting the amenity of those using the future Wandle Valley Regional Park” as an issue to consider for site M12 but not for the other sites despite the equal significance of their location in the Wandle Valley Regional Park (M6, M10, M14, M15 and M16). This should be addressed in the final plan.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett’s Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites. We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route along the east bank of the Wandle and, where appropriate, to secure its delivery.</p>	<p>Agree. We will add the reference “Protecting the amenity of those using the future Wandle Valley Regional Park” to sites M6, M10, M14, M15 and M16.</p> <p>Noted. However, it is considered that an expansion to walking routes within Merton is a matter that should come under the remit of the emerging Merton Local Plan.</p>
103.	Con44: Historic England	Unsound: Not justified	<p>We also note that our recommendations to identify and reference designated heritage assets in relation to sites C1 and M15 have not been taken forward. We would again stress the potential for development proposals to create adverse impacts on heritage significance through effects on setting, such as noise, vibration and dust. We therefore consider it important that nearby heritage assets are identified and assessed early in the development process in order to avoid or mitigate such impacts. We would urge that the relevant heritage assets are therefore included in the planning designation and issues to consider sections of these sites.</p>	<p>Agree. The Councils will include a reference to Airport House within the ‘Issues to Consider’ section for Site C1 and will reference the proximity of the Wandle Valley Conservation Area within the ‘Issues to Consider’ section for Site M15.</p>
Site M16: Riverside Bio Waste treatment Centre, 43 Willow Lane, Merton				
104.	Con10: Wandle Valley Forum	Unsound: Not justified	<p>We welcome adjustments made to the plan in respect of our earlier representations to acknowledge the proximity of the following sites to the Wandle and warranting an 8m buffer for sites M6, M10, M12, M14, M15, M16.</p> <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the</p>	<p>Noted.</p> <p>Disagree, The South London Waste Plan cannot support any</p>

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			<p>Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank.</p> <p>We also note the inconsistency in identifying “Protecting the amenity of those using the future Wandle Valley Regional Park” as an issue to consider for site M12 but not for the other sites despite the equal significance of their location in the Wandle Valley Regional Park (M6, M10, M14, M15 and M16). This should be addressed in the final plan.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett’s Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites. We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route along the east bank of the Wandle and, where appropriate, to secure its delivery.</p>	<p>development that is positive for the River Wandle and ignore the fact that the very same development may have potential negative implications for other aspects of south London.</p> <p>Agree. We will add the reference “Protecting the amenity of those using the future Wandle Valley Regional Park” to sites M6, M10, M14, M15 and M16.</p> <p>Noted. However, it is considered that an expansion to walking routes within Merton is a matter that should come under the remit of the emerging Merton Local Plan.</p>
Sutton Sites; General Comment				
105.	Con20: Resident AH	Unsound – Not justified	The waste industry can be unsightly and unpleasant for their neighbours. As a resident of Beddington North, it is noticeable how many with waste operators are in the area – and quite a lot more not far away. This does not help to enhance the environment, or experience of living in Beddington North – a ward that is singularly lacking in amenities, and often seems to be regarded as a dumping ground for otherwise unpopular industrial plants. It is time that Sutton started focusing on enhancing life in Beddington North.	Noted. Draft Policy WP5 sets out a comprehensive number of issues that any future development has to pay regard to in order to protect and enhance the amenity. In addition, there are a number of

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				policy in the adopted Sutton Local Plan that aimed at improving environment in Beddington North, including Policy 5 and Policy 14.
Site S2: Beddington Farmlands Energy Recovery Facility, 105 Beddington Lane, Sutton				
106.	Con30: Resident DT	Unsound – Not justified and not consistent with National Policy	<p>I would urge consideration regarding the plan in two specific areas. Firstly:</p> <p>Under the Title Soundness re Page 81 S2 - The continued use of the ERF in a suburb is not Justified or Consistent with National Policy. Specifically 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.</p> <p>I am petitioning as a resident voicing my concern for the area of Hackbridge and Wandle Valley in Sutton. The traffic flow from further expanding the HGVs fleet will negatively affect air pollution and especially if vehicles travel and are held up near residential roads. HGVs should not be sent through London Road Hackbridge. Secondly the ongoing operation from the ERF is not consistent with meeting air quality targets or climate emissions at a regional or national level.</p>	<p>Noted. However, the ERF has planning permission and an Environment agency license and is operational.</p> <p>The impacts of the ERF were comprehensively considered at the time of its planning application and comments on the application were received from the Environment Agency and TfL. The Environment Agency are responsible for the ongoing monitoring of the ERF.</p>
107.	Con31: Sutton & Croydon Green Party	Unsound – Not justified, not effective, not positively prepared	<p>Councils have committed to be carbon neutral by 2030 as part of their declarations of a Climate Emergency. This means that the waste incinerator will have to be closed by that date. Therefore the 25 year contract with the incinerator company must be changed and plans put in place to reduce, reuse, and recycle more waste instead of sending it to be burned.</p> <p>Therefore the current plan is neither positively prepared, justified, or effective.</p> <p>The waste incinerator will have to be closed by that 2030. Therefore the 25 year contract with the incinerator company must be changed and plans put in place to reduce, reuse, and recycle more waste instead of sending it to be burned.</p>	<p>The ERF has planning permission, an Environment agency license and is operational.</p> <p>The impacts of the ERF were comprehensively considered at the time of its planning application and comments on the application were received from the Environment Agency. The Environment Agency are responsible for the ongoing monitoring of the ERF.</p>

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Site S5: Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton				
108.	Con17: Hinton Skips (submitted by Mr M Kelly as agent)	Support	<p>I write on behalf of my client Hinton Skips Ltd concerning the above consultation. I act as their planning agent. Their site at the rear of 112 Beddington Lane, Sutton is listed as site S5 on page 84 of the current document.</p> <p>I can confirm that Hinton support their inclusion as a safeguarded site under Policy WP3 Existing Waste Sites.</p>	Noted
109.	Con36: Spaces4 Work (BPP Consulting)	Unsound – Not positively prepared, Not justified, Not consistent with national policy	<p>As identified in the Plan, the site has recently been developed as a skip waste recycling centre and is not currently safeguarded. The assessed throughput of the site is only 8,000tpa, therefore the loss of this site would have no significant impact on the amount of capacity available in the Plan area, or in Sutton specifically, to meet forecast management requirements for CDE waste.</p> <p>The owner wishes to retain flexibility over future use of the site. It is well-suited for a commercial use that would complement existing tenants across the remainder of the freehold. Imposition of waste safeguarding designation would introduce an unacceptable constraint to flexibility, and is not justified nor appropriate</p>	<p>Noted. However, alongside all the other sites that people are trying to de-designate, it all adds up.</p> <p>The Councils consider It is necessary to safeguard all the sites to get the surplus/meet the apportionment and to give flexibility to deal with an unexpected eventualities.</p>
Site S8: King Concrete, 124 Beddington Lane, Sutton				
110.	Con15: King Concrete (submitted by Mr M Kelly as agent)	Support	<p>I write on behalf of my client King Concrete Ltd concerning the above consultation. I act as their planning agent. Their site at 124 Beddington Lane, Sutton is listed as site S8 on page 87 of the current document.</p> <p>I can confirm that King Concrete support their inclusion as a safeguarded site under Policy WP3 Existing Waste Sites.</p> <p>With regard to the issues to consider if there is a further planning application, whilst they also support the overall objective of enclosing operations within a building (bullet point 1) they would just like to point out that this is sometimes impractical for various operational and health and safety reasons, for example such as the management of PM10 emissions in an enclosed space. We therefore would encourage you to include the words 'where possible' at the end of the sentence of the first bullet point.</p>	<p>Noted.</p> <p>The Councils contend that dust particles can be managed in an enclosed building and do not wish the outside environment to be polluted with PM10 particles.</p>

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Site S11: TGM Environmental, 122 Beddington Lane, Sutton				
111.	Con36: Spaces4 Work (BPP Consulting)	Unsound – Not positively prepared, Not justified, Not consistent with national policy	<p>The site is not in any waste use and instead is occupied by Amazon – a prestigious and important tenant with potential to bring substantial economic and employment benefits to the area.</p> <p>The owner has no intention of implementing the planning permission for a waste use and it is understood that TGM Environmental never occupied the site as it proved to not be fit for purpose and was not required.</p> <p>The site is not currently safeguarded, and the owner wishes to retain flexibility for alternative and more appropriate commercial uses of this prominent site fronting Beddington Lane. The site schedule in the Plan refers to the site being within the Strategic Industrial Location and that 'similar uses surround the site'. In fact, the uses neighbouring the site include a Wickes store and CPI Books which is housed in a modern attractive building. Commercial development and use would therefore be more appropriate in terms of appearance and the environment of the area, as well as employment generation and associated economic benefits.</p> <p>Removal of safeguarding for waste would enable re-development for a similar use and enable contribution to the broader policy objectives for the area as set out in the Sutton Local Plan.</p>	<p>Noted. The Council is currently analysing the latest EA Waste Interrogator data.</p>
Site S12: Beddington Lane resource recovery Facility, 79-85 Beddington Lane, Sutton				
112.	Con30: Resident DT	Unsound – Not justified and not consistent with National Policy	<p>I would urge consideration regarding the plan in two specific areas. Secondly:</p> <p>Under the Title of Soundness re Page 91 S12 – the operation of waste recovery and sorting at the Beddington Lane Resource Recovery Facility is not Justified or Consistent with National Policy. Specifically Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</p> <p>I am petitioning as a resident voicing my concern for the area of Hackbridge and Wandle Valley in Sutton. The traffic flow from further expanding the HGVs fleet will negatively affect air pollution and especially if vehicles travel and are held up near residential roads. HGVs should not be sent through</p>	<p>Noted. However, Site S12 has full planning permission. The transport impact of this site was considered in detail at the time of the planning application.</p> <p>The ERF has planning permission and an Environment agency license and is operational.</p> <p>The impacts of the ERF were comprehensively considered at</p>

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			London Road Hackbridge. Secondly the ongoing operation from the ERF is not consistent with meeting air quality targets or climate emissions at a regional or national level.	the time of its planning application and comments on the application were received from the Environment Agency and TfL. The Environment Agency are responsible for the ongoing monitoring of the ERF
113	Con40: SUEZ	General Comments	<p>SUEZ is the freehold owner of this site which has recently been granted planning permission (ref: DM2018/01865) for an integrated Resource Recovery Facility with an overall processing capacity of up to 350,000 tpa.</p> <p>As previously noted, the delivery of this facility is dependent upon the ability to redevelop Benedict Wharf in Mitcham, Merton, which is currently uncertain. We hope that this may be concluded by the date of examination of the SLWP. However if the Mayor of London resolves to refuse planning permission for the alternative (nonwaste) use of Benedict Wharf, the site will remain in operational waste use and BRRF will not be deliverable. The overall strategy of the SLWP would then need to be revised accordingly, which may mean, for example, considering whether site S12 could be released from safeguarding to contribute to industrial land supply.</p>	Noted. The Councils will monitor the progress of the application. However, the existing site is already a safeguarded waste site and the Councils would not support its release.
Appendix 2: Sites Counting Towards the Apportionment and C&D Target				
114.	Con18: Day Group Ltd (Firstplan as agent)	Support – justified	<p>i) Appendix 2 – Sites Counting Towards Apportionment and C&D Target</p> <p>As noted in our earlier representations, capacity for construction and demolition waste is notoriously difficult to measure as much takes place on construction sites or at waste management facilities with exemptions from Environment Agency permits. This is why it is not included within the London Plan apportionment figures (Paragraph 9.8.13 of the London Plan intend to adopt version). Nevertheless, the draft South London Issues and Options did seek to measure it in Figure 16. This table presented the maximum throughput figures, the licence figures and the ‘throughput counting towards apportionment’ figures. These Figures were transcribed across to the then Appendix 1 and the relevant Site Safeguarding Description Sheets.</p> <p>For the Day Aggregates Site (C4), Day Group agreed with the maximum throughput and licence figure for their site. However, they raised issue with</p>	Noted

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			<p>regard to why '0' of this was counted towards the C&D target. At the Purley Site construction and demolition waste is brought in from local sites by road, processed by the construction and demolition waste recycling plant to produce recycled aggregate which is then exported directly to local construction sites for use in construction, predominantly as sub-base materials for roads. It should therefore not be considered as a 'waste transfer operation' but as a construction and demolition waste processing site. The only material which is transferred for further recycling is a small quantity of metal waste. Overall, 99.6% of the construction and demolition waste that is brought to site is recycled into aggregate on site.</p> <p>It was therefore put forward that the correct figure for the final column for the Day Aggregates site (C4) is in the order of 178,593 tonnes (99.6% of 179,300). It was further noted that if the processing of construction and demolition waste is better understood then there may potentially be no shortfall in terms of capacity for this waste stream.</p> <p>In response to Question 6 of the Response Form – it is confirmed that the Submission Draft SLWP is supported on the basis that it has corrected the 'qualifying throughput' for Site C4 within both Appendix 2 and the Site Description. The correction ensures that the plan is 'justified' in that it is based on a proportionate and up to date evidence base and is in all other respects 'sound'.</p> <p>[Also See Appendix 2.]</p>	
Late Representation (Received 31 October 2020)				
115.	Con45: Resident CB	General	<p>I feel the following should be included in the plan:</p> <p>1 – a policy on the final/end destination of the waste, to include that final disposal meets with general local policy. And is both broadly monitored and reported to the public.</p> <p>2 – collection of thin film plastic is introduced. This now represents 75% of my general waste bin and seems to be increasing as suppliers adjust their packaging.</p>	<p>Noted. The draft SLWP includes a policy on monitoring the implementation of the plan (draft Policy 10 'Monitoring and Contingencies'). This will be reported on an annual basis through the Authority Monitoring Report.</p>

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			<p>3 – a policy on cleaning the plastic/glass etc that includes joined up thinking with the water companies. Water companies are requesting savings and suggesting waste is not cleaned having noticed increased usage.</p> <p>But generally the service I receive in Coulsdon from existing joint arrangement is very good.</p>	<p>The Councils recognise that changes to packaging is crucial in reduced waste. However, this is not a strategic planning matter so and cannot be specifically addressed in the SLWP. The Councils can address this outside of the SLWP. For example, Sutton Council's approach to reducing waste is set out in the Waste Minimisation Strategy 2019-2026 and its Reduction and Recycling Plan were adopted in December 2019.</p>