

- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



Sequential Test (Flood Risk)  
on Draft for Submission to Government

September 2020



# **SEQUENTIAL TEST (FLOOD RISK) ON PROPOSED WASTE MANAGEMENT SITES**

Draft South London Waste Plan (SLWP)

Submission Version

September 2020



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# 1. Introduction

## Background to the new South London Waste Plan

**1.1** The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21<sup>1</sup> introduced in 2012.

**1.2** The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the draft London Plan up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy, promote the circular economy and minimise any adverse impacts upon on nearby land uses and the local environment.

**1.3** Following public consultation on an Issues and Preferred Options document and accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation<sup>2</sup>), a draft version of the SLWP 2021-36 (the draft plan) has now been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public.

**1.4** The draft plan, which incorporates a number of changes made in the light of representations received and changing circumstances, safeguards 46 existing sites for waste treatment and identifies ten development management policies to guide waste treatment within the four boroughs over the next 15 years. An updated sustainability appraisal (SA) report, incorporating strategic environmental assessment (SEA), Equalities Impact Assessment (EqIA) and Habitats Regulations Screening, has been prepared alongside the draft plan in order to meet the requirements of the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended.

**1.5** In line with the government's national planning practice guidance (NPPG), a 'sequential test' has also been carried out on all potential waste sites within the plan area in order to identify the level of flood risk for each site, determine if the proposed uses are compatible with that level of risk and, where possible, to steer future waste related developments to areas (or to specific parts of individual sites) at the lowest probability of flooding. This document presents the findings of the sequential test in relation to the draft SLWP and should be read in conjunction with the site assessment included as Section 9 of the SA Report on 'Identifying and Assessing Waste Sites'.

**1.6** The draft plan, together with the SA Report and the Sequential Test (this document) has now been published for further consultation in accordance with Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012.

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<sup>1</sup> the current South London Waste Plan 2012 is available at <https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view>

<sup>2</sup> under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

## The purpose of the sequential test

1.7 The updated National Planning Policy Framework (NPPF) (DHCLG, June 2019)<sup>3</sup> requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Development plan documents, such as the joint South London Waste Plan, should therefore apply a sequential, risk-based approach to the identification of development sites in order to avoid flood risk to people and property and manage any residual risk, taking account of climate change. This should be done by applying the 'sequential test' and if necessary, applying the 'exception test' to all potential development sites in line with technical guidelines<sup>4</sup> set out in the government's NPPG.

1.8 The purpose of the sequential test is to ensure that sites at little or no risk of flooding are developed in preference to sites at higher risk, taking the vulnerability of the proposed use into account. This will help avoid the development of sites that are inappropriate on flood risk grounds. The sequential approach should be applied at all levels and scales of the planning process, both for sites between flood zones and where a site has to be located in a higher risk zone, within the extent of that flood zone by locating the more vulnerable elements of the development in the areas of lowest risk. All opportunities to locate new developments in reasonably available areas of little or no flood risk should be explored, prior to any decision to locate them in areas of higher risk.

1.9 The NPPG confirms that the Sequential Test can either be demonstrated in a free-standing document or included as part of the SA Report. The four boroughs have opted to produce a free-standing document for ease of reference and in order to avoid an excessively lengthy SA Report.

## Environment Agency Flood Zones

1.10 The basis for undertaking the Sequential Test lies primarily in assessing the probability of fluvial (river) flooding to each potential site in line with the following EA flood zone definitions in Table 1.1.

Table 1.1. Environment Agency Flood Zone definitions

| Flood Zone                                | Definition   |
|---|--|
| <b>Zone 1:<br/>Low Probability</b>        | Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)   |
| <b>Zone 2:<br/>Medium Probability</b>     | Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)   |
| <b>Zone 3a:<br/>High Probability</b>      | Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map)  |
| <b>Zone 3b:<br/>Functional Floodplain</b> | This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map). |

<sup>3</sup> the updated NPPF is available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>4</sup> formerly set out in the Government's Planning Policy Statement on Development and Flood Risk (PPS25) (now cancelled)



**1.11** The EA's Flood Map for Planning (Rivers and Sea)<sup>5</sup> shows the extent of the above flood zones and provides information on the areas that would flood if there were no flood defences or buildings within the 'natural' floodplain'. It also identifies areas which, in the event of a river flood with a 1% AEP, or a tidal flood with a 0.5% AEP, would be protected from flooding by the presence of flood defences<sup>6</sup>. However it should be noted that the above Flood Zones do not take account of the possible impacts of climate change on the future probability of flooding.

**1.12** This mapping was first developed in 2004 using national generalised modelling (JFLOW) and is now routinely updated using the results from the EA's programme of catchment studies, entailing topographic surveys and hydrological and/or hydraulic modelling as well as previous flood events.

**1.13** An overview of flood risk across each of the four boroughs making up the plan area is provided in Section 2 of this document.

## The purpose of the Exceptions Test

**1.14** If, following application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the exception test can be applied if appropriate. For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
- a site-specific flood risk assessment (FRA) prepared in support of any planning application must demonstrate that the development will be "safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall". Both elements of the test will have to be passed for development to be allocated or permitted<sup>7</sup>.

**1.15** The NPPG is clear that where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications provided (in either the Sequential Test document or in the SA Report) for any decision to allocate land in areas at high flood risk. in the sustainability appraisal report.

## Flood risk vulnerability classifications

**1.16** The sequential test must take account of the vulnerability of different types of development as set out in the government's flood risk vulnerability classifications in Table 2 of the NPPG and as set out below in Table 1.2.

**Table 1.2. Government Flood Risk Vulnerability Classifications**

### Essential infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.

<sup>5</sup> the EA's Flood Map for Planning (Rivers and Sea) is available at <https://flood-map-for-planning.service.gov.uk/>

<sup>6</sup> these areas are described as 'Areas Benefitting from Defences' (ABD).

<sup>7</sup> within the context of the South London Waste Plan, many of the proposed sites are already in operation and therefore have planning permission. In such cases, a site specific FRA will already have been prepared in support of the planning application to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall

|  |
|--|
| <p><b>Highly vulnerable</b></p> <ul style="list-style-type: none"> <li>• Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Caravans, mobile homes and park homes intended for permanent residential use.</li> <li>• Installations requiring hazardous substances consent<sup>4</sup>. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'essential infrastructure')</li> </ul>                                       |
| <p><b>More vulnerable</b></p> <ul style="list-style-type: none"> <li>• Hospitals.</li> <li>• Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• <b>Landfill and sites used for waste management facilities for hazardous waste.</b></li> <li>• Sites used for holiday or short-let caravans and camping etc</li> </ul>  |
| <p><b>Less vulnerable</b></p> <ul style="list-style-type: none"> <li>• Police, ambulance and fire stations which are <i>not</i> required to be operational during flooding.</li> <li>• Buildings used for shops, financial, professional and other services,</li> <li>• restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in "more vulnerable", and assembly and leisure;</li> <li>• Land and buildings used for agriculture and forestry.</li> <li>• <b>Waste treatment (except landfill and hazardous waste facilities).</b></li> <li>• Minerals working and processing (except for sand and gravel working).</li> <li>• Water treatment works which do <i>not</i> need to remain operational during times of flood.</li> <li>• Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).</li> </ul> |
| <p><b>Water-compatible development</b></p> <ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence defence installations.</li> <li>• Ship building, repairing and dismantling, fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities (changing rooms)</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</li> </ul>  |

1.17 It can be seen from the above table that most sites used for waste treatment purposes (except for landfill and hazardous waste facilities) fall within the 'less vulnerable' category with regard to flood risk. Both landfill sites and hazardous waste facilities are classed as 'more vulnerable' since such sites pose much greater potential risks to human health, ecosystems and neighbouring land uses in the event of a flood. However no new landfill sites are being put forward as part of the new SLWP.

## Flood risk compatability of different development types

1.18 Table 1.3, which is based on Table 3 of the NPPG, indicates the compatibility of the above development types with each of the Environment Agency's (EA) flood zones.

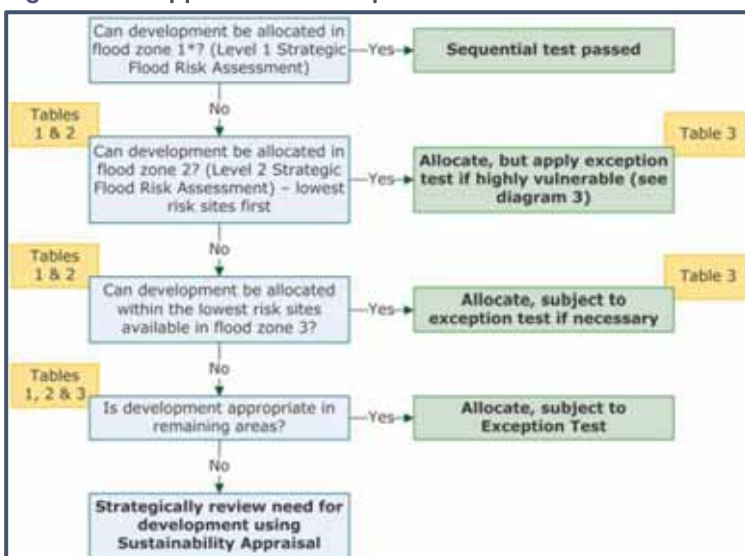
**Table 1.3: Flood Risk Vulnerability and Flood Zone 'Compatibility' (NPPG, 2014)**

| Flood Zone                                | Essential infrastructure | Water compatible | Highly vulnerable       | More vulnerable         | Less vulnerable |
|---|--------------------------|------------------|-------------------------|-------------------------|-----------------|
| <b>Zone 1:<br/>Low Probability</b>        | ✓                        | ✓                | ✓                       | ✓                       | ✓               |
| <b>Zone 2:<br/>Medium Probability</b>     | ✓                        | ✓                | Exception Test required | ✓                       | ✓               |
| <b>Zone 3a:<br/>High Probability</b>      | Exception Test required  | ✓                | X                       | Exception Test required | ✓               |
| <b>Zone 3b:<br/>Functional Floodplain</b> | Exception Test required  | ✓                | X                       | X                       | X               |

1.19 The above vulnerability and flood zone compatability tables show that most sites likely to be retained or designated within the plan area for waste treatment purposes, apart from hazardous waste facilities, are likely to be deemed 'compatible' with all levels of fluvial flood risk up to and including EA Flood Zone 3a (high risk) without a formal requirement for the Exception test to be carried out. However, any proposed waste facilities in EA Flood Zone 3b (functional floodplain) should not be permitted. A greater degree of caution is required for hazardous waste facilities, which require an Exception test for sites located within EA Flood Zone 3a (high risk).

1.20 Figure 1.1 below sets out the government's recommended process for undertaking the sequential and exceptions test as part of the plan preparation process as set out in the NPPG

**Figure 1.1: Application of Sequential Test for Local Plan Preparation**





## 2. Flood risk across the plan area

2.1 The extent of flood risk from both fluvial and surface water flooding across the plan area is shown below in Figures 2.1-2.8. The mapping for the London Boroughs of Croydon, Merton and Sutton is based upon the joint Strategic Flood Risk Assessment (SFRA) Level 1 Report prepared on behalf of the four Wandle catchment boroughs<sup>8</sup> by AECOM consultants in December 2015. The mapping for the Royal Borough of Kingston-upon-Thames is based on work carried out by Capita consultants in 2014 for the purpose of Kingston's Local Flood Risk management Strategy.

### London Borough of Croydon

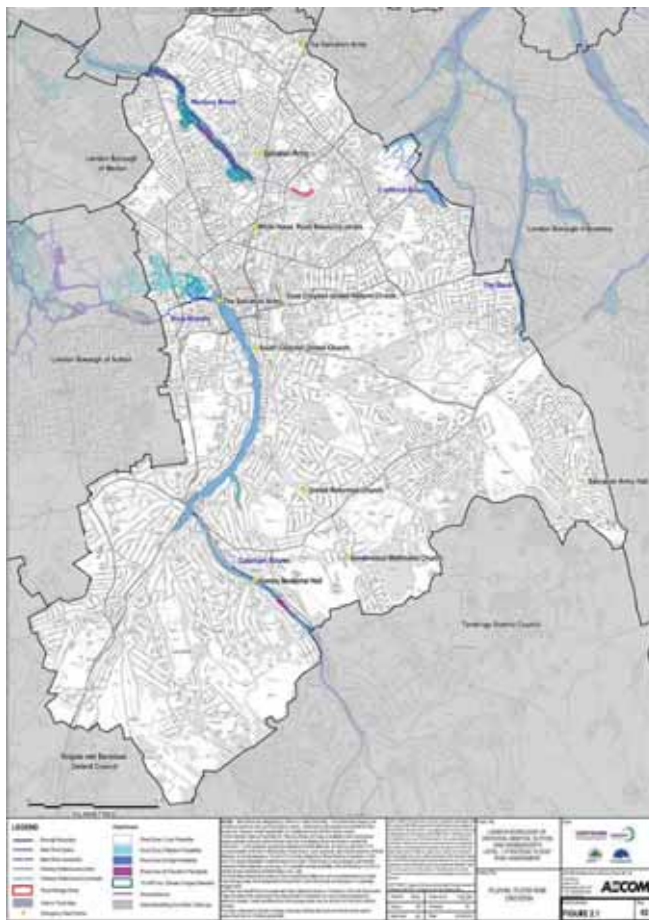


Figure 2.1: Fluvial flood risk in LB Croydon (EA Flood Zones)

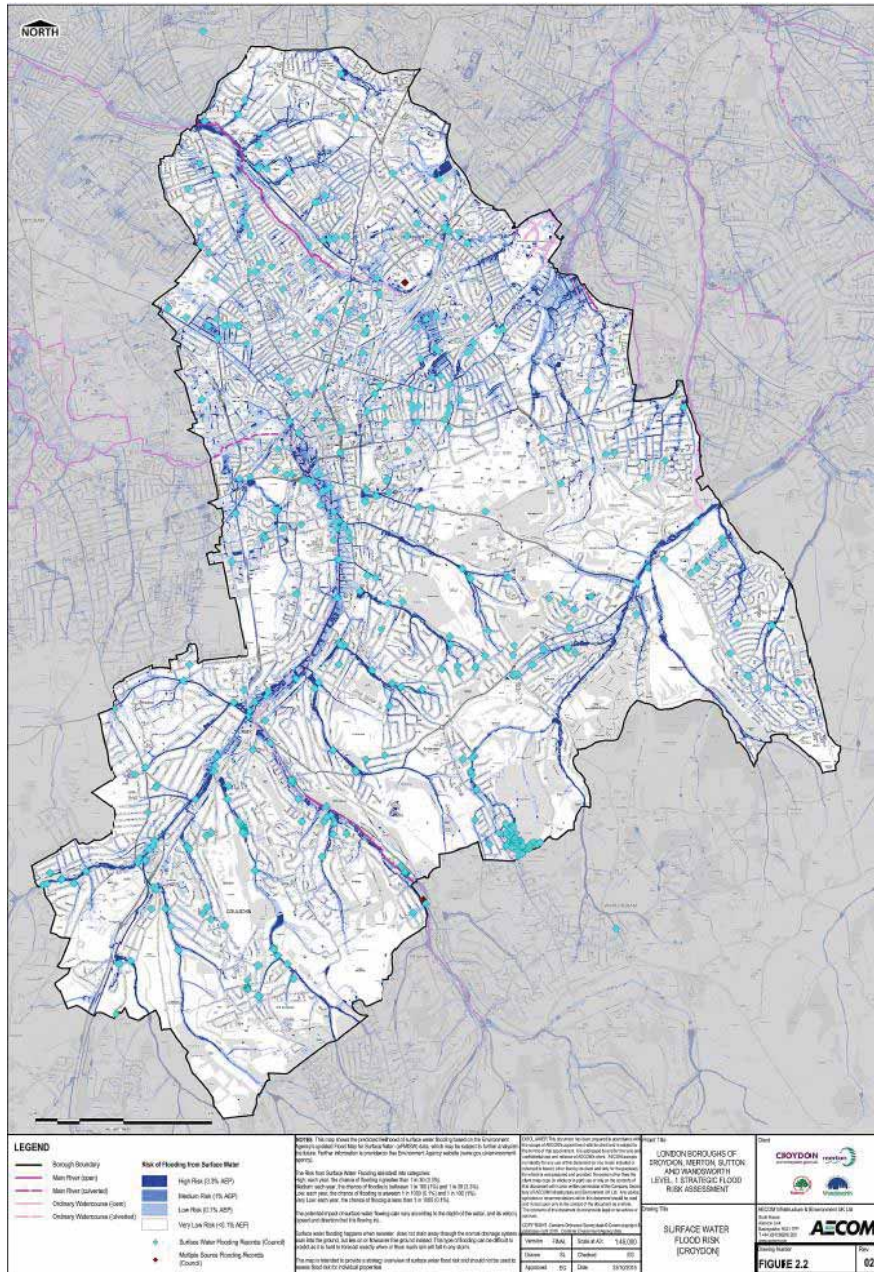
Table 2.1: Fluvial flood risk in LB Croydon – Properties located within EA Flood Zones

| EA Flood Zone                          | Flood Risk   | % of Borough | Dwellings | Non-Residential | Unclassified |
|--|--|--------------|-----------|-----------------|--------------|
| Flood Zone 1<br>Low Risk               | Less than 1 in a 1000 annual probability (<0.1%)           | 97.8%        | 144,140   | 6,149           | 8,649        |
| Flood Zone 2<br>Medium Risk            | Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%) | 1.7%         | 1,030     | 113             | 107          |
| Flood Zone 3a<br>High Risk             | More than 1 in a 100 annual probability (>1%)              | <0.5%        | 3,913     | 380             | 326          |
| Flood Zone 3b<br>Functional Floodplain | More than 1 in 20 annual probability (>5% 'defended').     | <0.5%        | 235       | 48              | 15           |

<sup>8</sup> including the London Borough of Wandsworth



Figure 2.2: Surface water flood risk in LB Croydon



Source: SFRA Level 1 Report (AECOM, December 2015)

Table 2.2: Surface Water Flooding in LB Croydon: Properties at Risk in the 1 in 100 year event

| RoFSW <sup>9</sup> Category | Surface Water Flood Risk                                      | Dwellings | Non-Residential | Unclassified |
|-----------------------------|---|-----------|-----------------|--------------|
| Low                         | Less than 1 in 100 annual probability (<1%)                   | 32,090    | 1,434           | 1,722        |
| Medium                      | Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%) | 10,094    | 871             | 638          |
| High                        | More than 1 in a 30 annual probability (>3.3%)                | 5,856     | 737             | 513          |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

<sup>9</sup> based on the Government's Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMFSW))



# RB Kingston-upon-Thames

Figure 2.3: Fluvial flood risk in RB Kingston (EA Flood Zones)

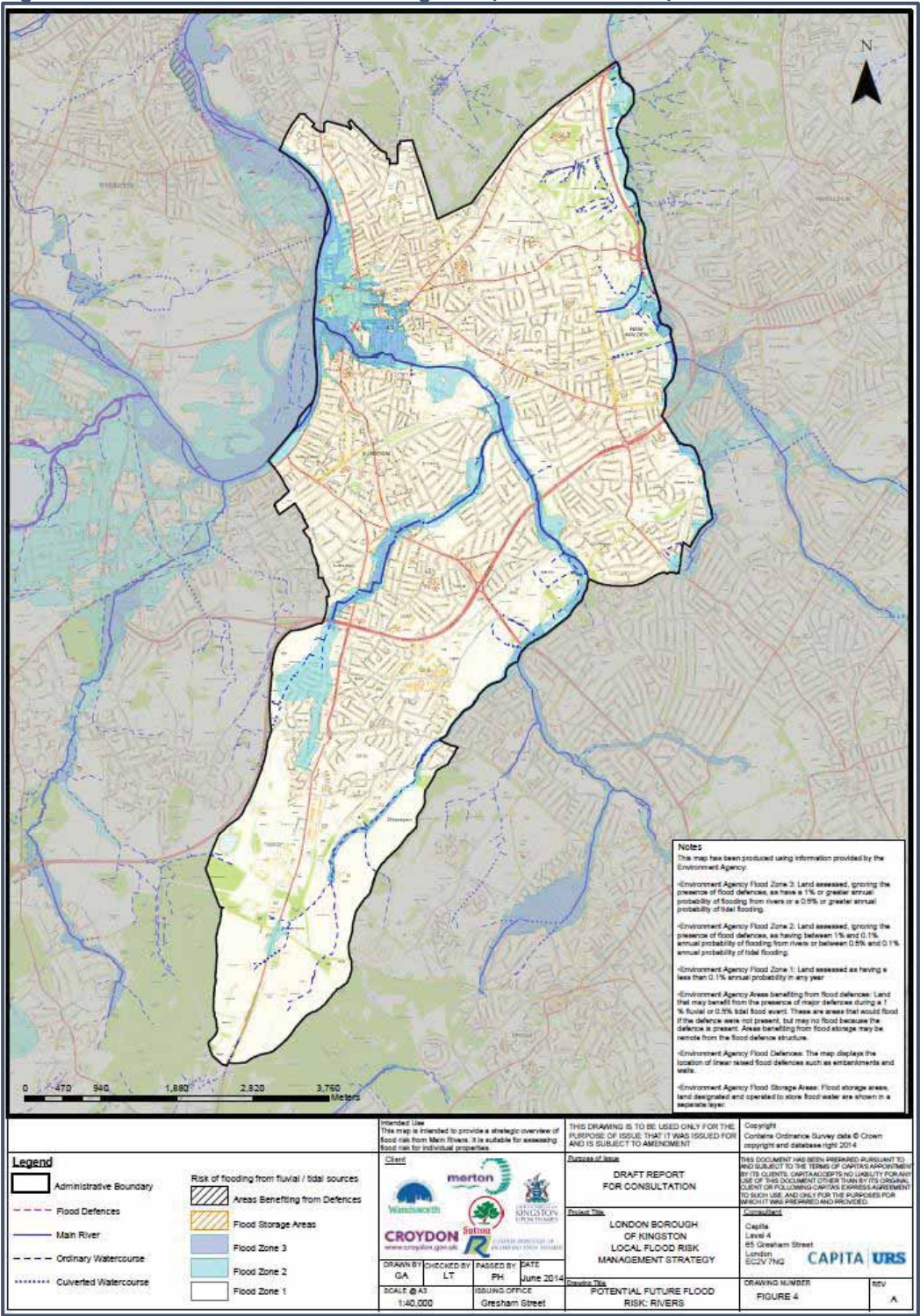


Figure 2.4: Surface water flood risk in RB Kingston

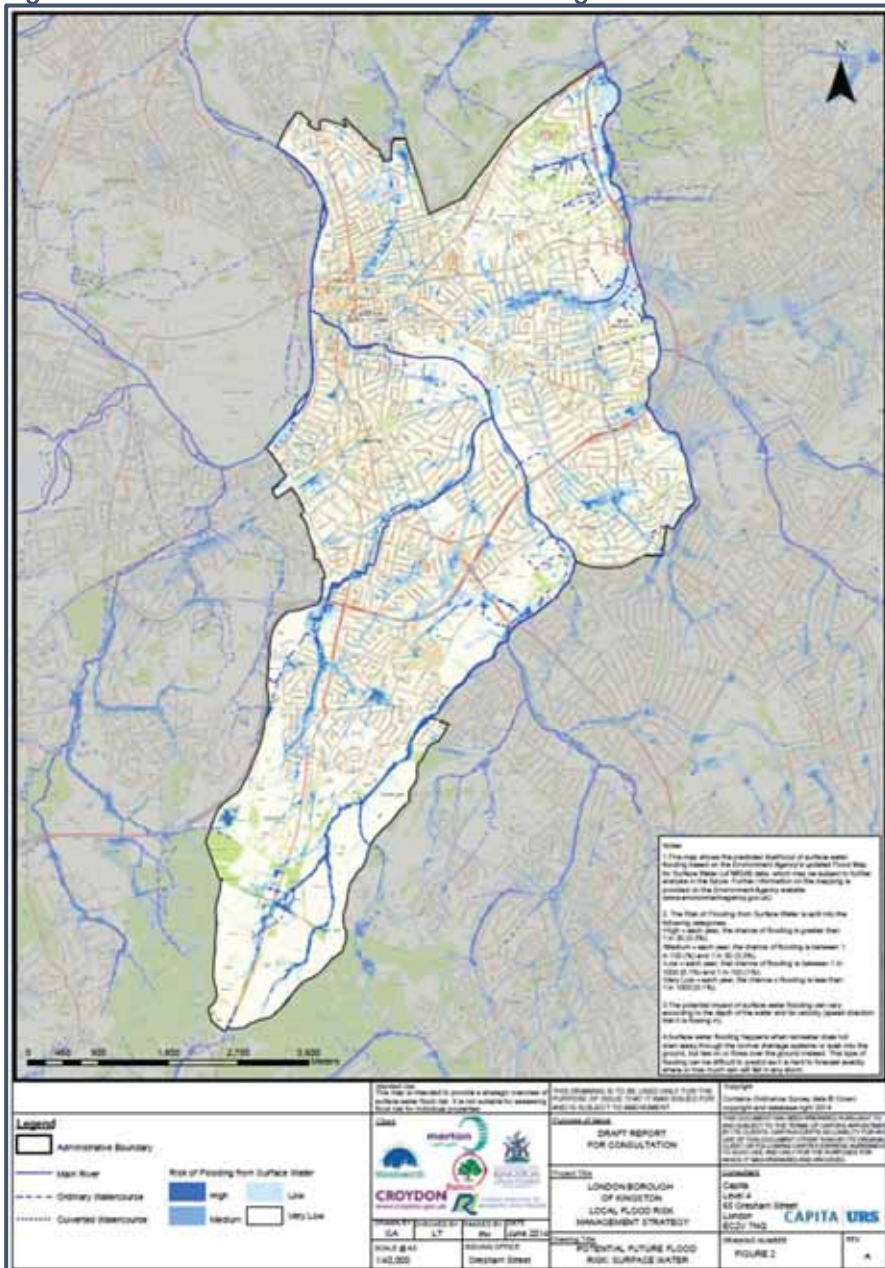


Table 2.4: Surface Water Flooding in RB Kingston: Properties at Risk in the 1 in 100 year event

| RoFSW <sup>10</sup> Category | Surface Water Flood Risk                                      | Dwellings                 | Non-Residential           | Unclassified              |
|------------------------------|---|---------------------------|---------------------------|---------------------------|
| Low                          | Less than 1 in 100 annual probability (<1%)                   | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| Medium                       | Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%) | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| High                         | More than 1 in a 30 annual probability (>3.3%)                | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |

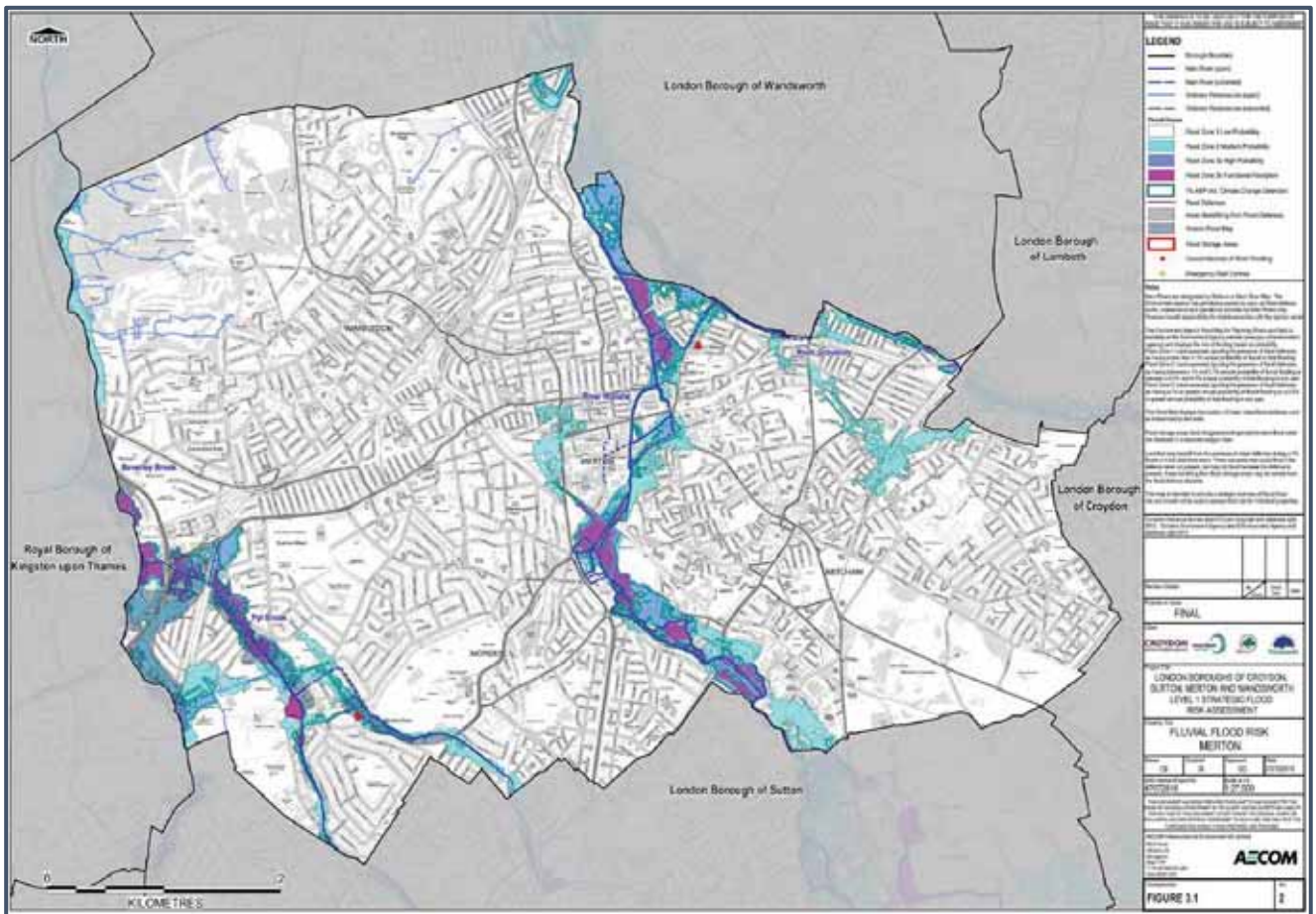
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

<sup>10</sup> based on the Government's Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMFSW))



## LB Merton

Figure 2.5: Fluvial flood risk in LB Merton- EA Flood Zones



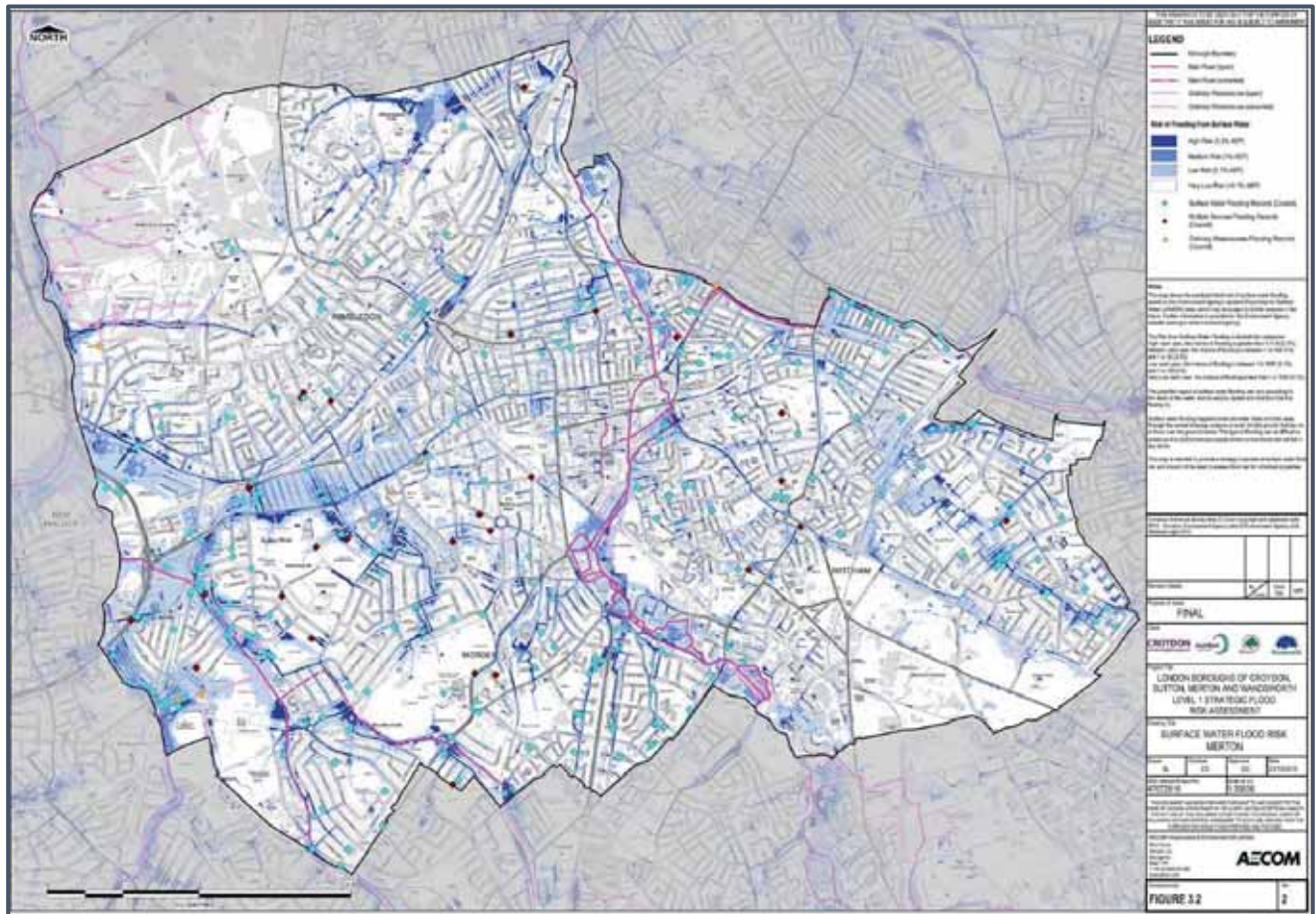
Source: SFRA Level 1 Report (AECOM, December 2015)

Table 2.5: Fluvial flood risk in LB Merton – Properties located within EA Flood Zones

| EA Flood Zone                       | Flood Risk   | Land Area of the Borough | Dwellings | Non-Residential | Unclassified |
|-------------------------------------|--|--------------------------|-----------|-----------------|--------------|
| Flood Zone 1 Low Risk               | Less than 1 in a 1000 annual probability of flooding (<0.1%)           | 91.0%                    | 78,864    | 3,698           | 6,496        |
| Flood Zone 2 Medium Risk            | Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%) | 5.2%                     | 5,106     | 316             | 489          |
| Flood Zone 3a High Risk             | More than 1 in a 100 annual probability of flooding (>1%)              | 1.9%                     | 1,272     | 101             | 136          |
| Flood Zone 3b Functional Floodplain | More than 1 in 20 annual probability of flooding (>5% 'defended').     | 1.7%                     | 254       | 20              | 61           |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 2.6: Surface water flood risk in LB Merton



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 2.6: Surface Water Flooding: Properties at Risk in LB Merton

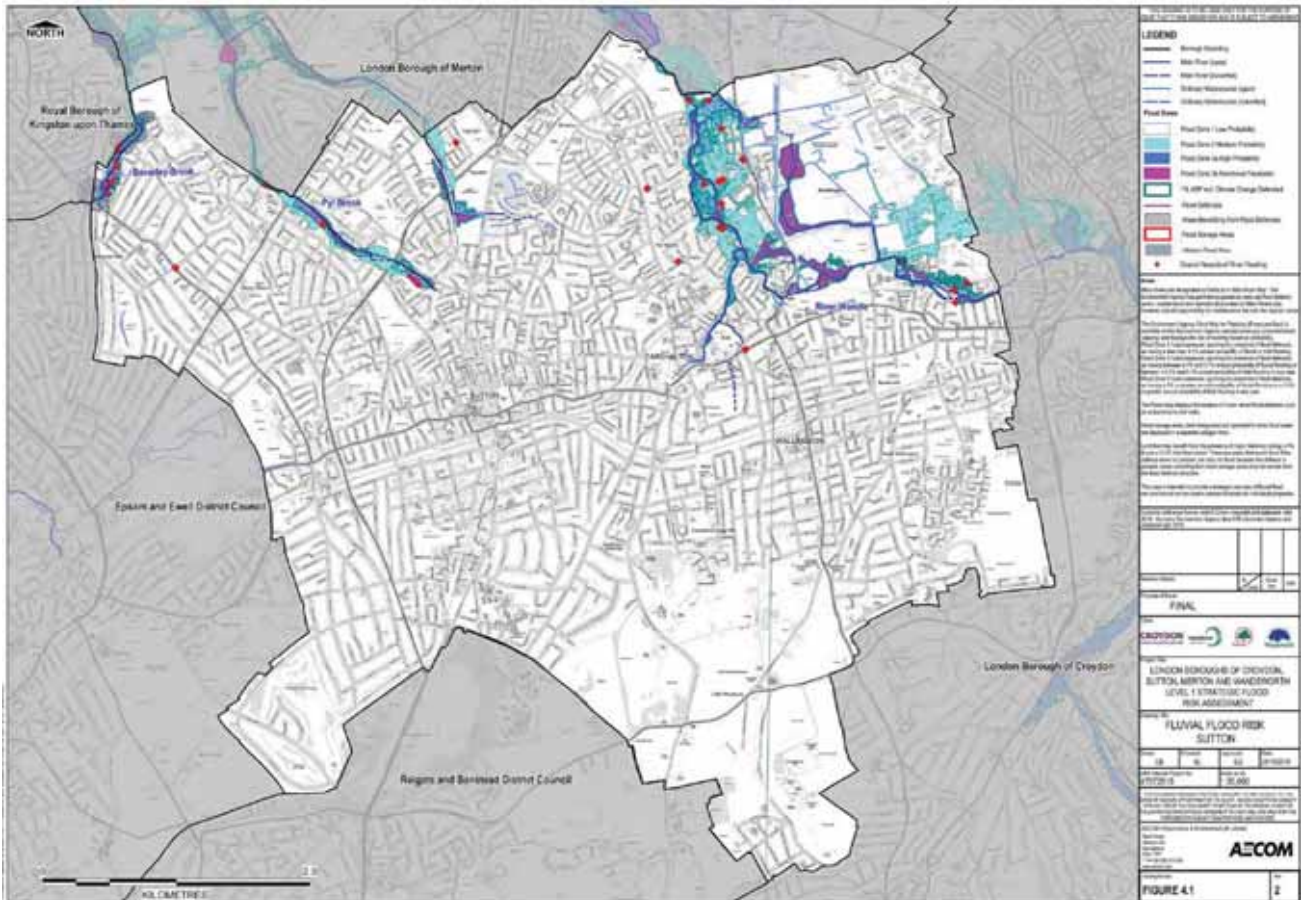
| RoFSW Category | Surface Water Flood Risk  | Dwellings | Non-Residential | Unclassified |
|----------------|---|-----------|-----------------|--------------|
| Low            | Less than 1 in 100 annual probability of flooding (<1%)                   | 19,730    | 1,147           | 1,936        |
| Medium         | Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%) | 4,361     | 439             | 190          |
| High           | More than 1 in a 30 annual probability of flooding (>3.3%)                | 1,668     | 176             | 247          |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)



## LB Sutton

Figure 2.7: Fluvial flood risk in LB Sutton - EA Flood Zones



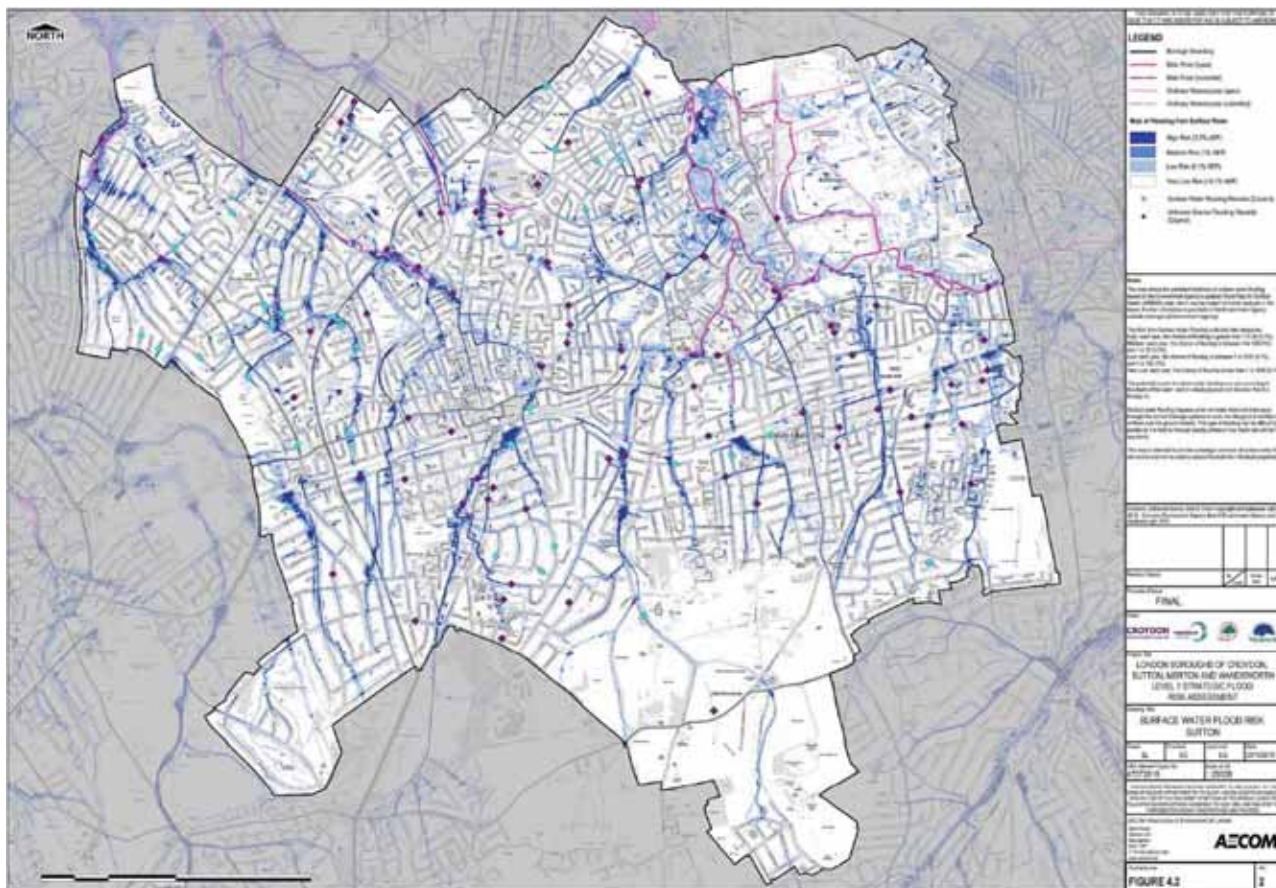
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 2.7: Fluvial flood risk in Sutton – Properties located within EA Flood Zones

| EA Flood Zone                       | Flood Risk   | Land Area of the Borough | Dwellings | Non-Residential | Unclassified |
|-------------------------------------|--|--------------------------|-----------|-----------------|--------------|
| Flood Zone 1 Low Risk               | Less than 1 in a 1000 annual probability of flooding (<0.1%)           | 96.3%                    | 76,352    | 3,236           | 5,699        |
| Flood Zone 2 Medium Risk            | Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%) | 2.4%                     | 1,889     | 167             | 181          |
| Flood Zone 3a High Risk             | More than 1 in a 100 annual probability of flooding (>1%)              | 1.0%                     | 822       | 20              | 43           |
| Flood Zone 3b Functional Floodplain | More than 1 in 20 annual probability of flooding (>5% 'defended').     | 0.2%                     | 198       | 11              | 20           |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 2.8: Surface water flood risk in LB Sutton



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 2.8: Surface Water Flooding in LB Sutton: Properties at Risk in the 1 in 100 year event

| RoFSW Category | Surface Water Flood Risk  | Dwellings | Non-Residential | Unclassified |
|----------------|---|-----------|-----------------|--------------|
| Low            | Less than 1 in 100 annual probability of flooding (<1%)                   | 15,429    | 870             | 1,078        |
| Medium         | Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%) | 4,287     | 325             | 303          |
| High           | More than 1 in a 30 annual probability of flooding (>3.3%)                | 2,860     | 267             | 219          |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

## 3. Identification of potential waste sites for the purpose of the Sequential Test

### Identifying sites and broad locations

3.1 Paragraph 4 of the NPPW states that:

*“Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.”*

3.2 In addition, 2020 London Plan Policy SI 8 states that:

*“Development Plan should identify the following as suitable locations to manage borough waste apportionments:*

*(a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity;*

*(b) Strategic Industrial Locations and Locally Significant Industrial Sites;*

*(c) safeguarded wharves with an existing or future potential for waste and secondary material management.”*

3.3 At the outset of the preparation of the new South London Waste Plan (SLWP), an initial ‘longlist’ of potential sites and ‘broad areas’ was identified for the purposes of both the sequential test and for the wider assessment of site suitability, availability and viability. This incorporated all of the existing or permitted waste treatment sites within the four Boroughs together with all of the Strategic Industrial Locations (SILs) and locally significant industrial locations (LSILs) across the plan area which were previously identified as ‘broad areas suitable for waste management uses’ in Schedule 2 of the existing SLWP 2012.

3.4 The initial ‘longlist’ therefore brought forward all of the currently designated waste sites and broad locations for further consideration as part of the preparation of the SLWP Issues and Preferred Options document for public consultation between 31 October and 2 December 2019.

### Initial site profiling

3.5 The period leading up to consultation on SLWP ‘Issues and Preferred Options’, Anthesis consultants prepared initial site profiles for all existing waste management sites including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility, planning constraints and opportunities for intensification or upgrading existing operations.

3.6 The results of the initial site profiling work, including a broad assessment of flood risk affecting each potential site, are set out Appendix 4 of the Technical Paper (Anthesis, July 2019).



## Broad areas considered unsuitable for waste uses

3.7 Since the adoption of the current SLWP 2012, a number of industrial areas listed in Schedule 2 or smaller parcels of land forming part of a currently designated SILs or LSILs have since been redeveloped or allocated for other uses as set out in Table 3.2 below. These broads areas are therefore considered unsuitable (or unavailable) for the development of future waste facilities and this is reflected in the outcome of the detailed site assessment and the sequential test.

**Table 3.2: Broad areas areas previously identified as suitable but not carried forward**

| SLWP 2012 Ref.              | Industrial Area                                      | Significant changes since 2012  |
|-----------------------------|--|---|
| <b>CROYDON/ SUTTON</b>      |  |   |
| 102                         | Purley Way, Lysander Road and Imperial Way Ind. Area | n/a   |
| <b>CROYDON</b>              |  |   |
| 99                          | Purley Oaks Highways Depot                           | This area has been allocated as a Gypsy and Traveller site. Therefore, it is no longer suitable for new waste facilities  |
| 105                         | Factory Lane Industrial Estate                       | 3.33ha of land within this area has been designated for redevelopment (Proposal Sites 430 and 946). Therefore the area suitable for waste uses will reduce in size  |
| 125                         | Factory Lane (Sth Side)                              | n/a   |
| <b>KINGSTON</b>             |  |   |
| 351,352,353                 | Chessington Industrial Area                          | n/a   |
| <b>MERTON</b>               |  |   |
| 641, 642                    | Durnsford Road Industrial Area                       | This area has had office buildings converted to residential accommodation under Prior Approval (Vantage House, Weir Road). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of the south of the area for new waste uses. Durnsford Road was identified in the Crossrail 2 consultation in 2015 as the 'proposed site for stabling, depot, shaft and tunnelling works', however Crossrail 2 works are likely to begin beyond the plan period |
| 702                         | Garth Road Industrial Area                           | This area has had office buildings converted to residential uses under Prior Approval (Enterprise House). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of parts of the Area for waste uses  |
| 69                          | Willow Lane Industrial Area                          | This area has had office buildings converted to residential accommodation under Prior Approval (Connect House). The Area is now subject to an Article 4 direction which has removed the permitted development rights, however the residential accommodation already in the middle of the Area will affect the suitability of parts of the Area for waste uses. Willow Lane is a Business Improvement District and is currently subject to a BID vote  |
| <b>SUTTON</b>               |  |   |
| 5312,532,533, 534, 535 &539 | Beddington Ind Area (part)                           | n/a   |
| 491                         | Kimpton Industrial Estate (part)                     | Land north of Minden Road has been redeveloped for other uses. Therefore, it is no longer suitable for new waste facilities   |
| 1006                        | Wandle Valley Trading Estate (part)                  | This area has been redeveloped for other uses and it is an integral part of the Wandle Valley Trail. Therefore, it is no longer suitable for new waste facilities   |

## Assessing current and future waste management capacity

**3.8** In order to assess the need for additional waste sites for inclusion in the new SLWP, a comprehensive analysis was undertaken for all operational waste management sites in South London in order to establish current and future waste management capacity within the plan area. A number of data sources were used, including discussions with site owners and EA 'active sites', Waste Data Interrogator (WDI) and environmental permitting data (using 2017 as the baseline year).

**3.9** The sites included in the appraisal therefore consisted of all of the existing waste treatment sites within the four Boroughs together with all of the Strategic Industrial Locations (SILs) and locally significant industrial locations (LSILs) across the plan area. It also includes Site C4: Days Aggregates site, which utilises the Purley railhead. The Chessington railhead was not included as the operators have informed officers that the site will not be used for waste management purposes and so would fail the availability strand of the developability test (see below).

**3.10** In line with the Intend to Publish London Plan 2019, waste is deemed to be 'managed' where:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra definition as a minimum<sup>11</sup>.

**3.11** Where material is bulked at transfer stations for transportation to other waste management facilities, this capacity is not included as a contribution towards the apportionment targets. However, where a proportion of the incoming waste is recycled, this recycling capacity has been included.

**3.12** Waste facilities in the planning pipeline were identified which, if given permission, would also contribute towards meeting any shortfall in waste management capacity. Exempt sites, which do not require an environmental permit, have also been included where capacity meets the requirements of the London Plan (see Section 5.2.3 of the Anthesis consultants' Technical Paper).

**3.13** Table 3.2 below provides a breakdown of existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment for household and C&I waste. Where relevant, opportunities to increase capacity are identified, such as intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses'.

**Table 3.2 Sites Counting Towards the Apportionment and C&D Targets (updated)**

| Ref            | Name   | Household/C&I (tpa) | C&D (tpa) | Potential for Intensification |
|----------------|--|---------------------|-----------|-------------------------------|
| <b>Croydon</b> |  |                     |           |                               |
| C1             | Able Waste Services                          | 0                   | 43,268    |                               |
| C4             | Days Aggregates Purley Depot                 | 0                   | 178,593   |                               |
| C5A            | Factory Lane Waste Transfer Station          | 0                   | 0         | Yes                           |
| C5B            | Factory Lane Reuse and Recycling Centre site | 9,623               | 5,206     |                               |
| C6             | Fishers Farm Reuse & Recycling Centre        | 4,542               | 0         |                               |
| C7             | Henry Woods Waste Management                 | 0                   | 0         |                               |

<sup>11</sup> refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns

| Ref                    | Name   | Household/C&I (tpa) | C&D (tpa)      | Potential for Intensification |
|------------------------|--|---------------------|----------------|-------------------------------|
| C8                     | New Era Materials                              | 4,213               | 0              |                               |
| C9                     | Peartree Farm                                  | 0                   | 0              |                               |
| C10                    | Purley Oaks Civic Amenity Site                 | 6,684               | 0              |                               |
| C11                    | Safety Kleen                                   | 0                   | 0              |                               |
| C12                    | Stubbs Mead Depot                              | 0                   | 0              |                               |
| C13                    | Solo Wood Recycling                            | 5,000               | 0              | Yes                           |
| CEX                    | Exempt Sites                                   | 2,580               | 0              |                               |
|                        | <b>Croydon Total</b>                           | <b>32,883</b>       | <b>227,067</b> |                               |
| <b>Kingston</b>        |  |                     |                |                               |
| K2                     | Genuine Solutions Group                        | 1,630               | 0              |                               |
| K3                     | Kingston Civic Amenity Centre                  | 9,392               | 0              |                               |
| K4                     | Kingston Waste Transfer Station                | 19,620              | 0              |                               |
| KEX                    | Exempt Sites                                   | 5,000               | 0              |                               |
|                        | <b>Kingston Total</b>                          | <b>35,642</b>       | <b>0</b>       |                               |
| <b>Merton Capacity</b> |  |                     |                |                               |
| M1                     | B&T@Work                                       | 0                   | 0              |                               |
| M2                     | European Metal Recycling                       | 70,100              | 0              |                               |
| M3                     | Deadman Confidential                           | 9,866               | 0              |                               |
| M4                     | Garth Road Re-use and Recycling Centre         | 15,704              | 0              |                               |
| M5                     | Garth Road Transfer Station                    | 0                   | 0              |                               |
| M6                     | George Killoughery                             | 0                   | 0              |                               |
| M7                     | LMD Waste Management (Abbey Industrial Estate) | 0                   | 20,774         |                               |
| M8                     | LMD Waste Management Wandle Way                | 0                   | 33,845         |                               |
| M9                     | Maguire Skips (Wandle Way)                     | 0                   | 0              |                               |
| M10                    | Powerday (Weir Court)                          | 0                   | 42,856         |                               |
| M11                    | Morden Transfer Station                        | 0                   | 0              |                               |
| M12                    | NJB Recycling                                  | 0                   | 18,030         |                               |
| M13                    | One Waste Clearance                            | 13,453              | 4,547          |                               |
| M14                    | Reston Waste Transfer and Recovery             | 0                   | 30,131         |                               |
| M15                    | Riverside AD Facility                          | 46,341              | 0              |                               |
| M16                    | Riverside Bio Waste Treatment Centre           | 51,715              | 0              |                               |
| M17                    | UK and European (Ranns) Construction           | 0                   | 0              |                               |
| M18                    | Wandle Waste Management                        | 0                   | 0              |                               |
| MEX                    | Exempt Sites                                   | 1,000               | 0              |                               |
|                        | <b>Merton Total</b>                            | <b>213,179</b>      | <b>150,183</b> |                               |
| <b>Sutton Capacity</b> |  |                     |                |                               |
| S1                     | 777 Recycling Centre                           | 20,625              | 32,972         |                               |
| S2                     | Beddington Farmlands ERF                       | 275,000             | 0              |                               |
| S3                     | Cannon Hygiene                                 | 0                   | 0              |                               |
| S4                     | Croydon Transfer Station                       | 21,113              | 0              | Yes                           |
| S5                     | Hinton Skips                                   | 5,381               | 1,819          | Yes                           |
| S6                     | Hydro Cleansing                                | 0                   | 0              |                               |
| S7                     | Kimpton Civic Amenity Site                     | 8,640               | 0              |                               |



| Ref                              | Name   | Household/C&I (tpa) | C&D (tpa)      | Potential for Intensification |
|----------------------------------|--|---------------------|----------------|-------------------------------|
| S8                               | King Concrete                                | 0                   | 0              | Yes                           |
| S9                               | Premier Skip Hire                            | 8,072               | 2,728          |                               |
| S10                              | Raven Recycling                              | 5,310               | 5,506          |                               |
| S11                              | TGM Environmental                            | 15,000              | 0              |                               |
| S12                              | Country Waste Skip Hire                      | 305,000             | 0              |                               |
| SEX                              | Exempt Sites                                 | 500                 | 0              |                               |
|                                  | <b>Sutton Total</b>                          | <b>664,641</b>      | <b>43,025</b>  |                               |
| <b>South London Capacity</b>     |  |                     |                |                               |
|                                  | Croydon                                      | 32,883              | 227,067        |                               |
|                                  | Kingston                                     | 35,642              | 0              |                               |
|                                  | Merton                                       | 213,179             | 150,183        |                               |
|                                  | Sutton                                       | 664,641             | 43,025         |                               |
|                                  | <b>South London Total</b>                    | <b>946,345</b>      | <b>420,275</b> |                               |
| <b>South London Capacity Gap</b> |  |                     |                |                               |
|                                  | South London Capacity (2017 baseline year)   | 946,345             | 420,275        |                               |
|                                  | South London Apportionment/Forecast for 2036 | 929,750             | 414,380        |                               |
|                                  | <b>Capacity Gap/ Surplus</b>                 | <b>+16,595</b>      | <b>+5,895</b>  |                               |

Source: Anthesis Consultants 2019 (incorporating subsequent amendments 2020)

**3.14** The waste capacity information in Table 3.4 has been revised following consultation on the SLWP Issues and Preferred Options document in order to accommodate new waste throughput figures and to reflect the latest information from site owners as to which sites have potential for intensification. In addition, a number of sites have been amended or deleted as follows:

- **Site C2 (Croydon Car Spares, Croydon)** was deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- **Site C3 (Curley Skip Hire, Croydon)** was deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- **Site C4 (Days Aggregates):** The estimated throughput of C&D waste at this site was increased from 0 to 178,593 tonnes per annum following consultation with the site owner;
- **Site C5 (Factory Lane Waste Transfer Station)** was divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners; and
- **Site K1 (Chessington Equestrian Centre)** was deleted because it is a temporary site which is closing soon.

**3.15** The most significant outcome of the above changes (arising from the increased throughput figures for the Days Aggregates site C4) is that the overall current throughput of C&D waste across the four boroughs has increased from 241,682 to 420,275 tonnes per year.

**3.16** Table 3.1 shows that the current capacity for the management of household and C&I waste in South London is 946,345 tonnes per annum. This represents a capacity surplus of 16,595 tonnes per annum compared to the combined apportionment of 929,750 tonnes per annum for 2036.

**3.17** The overall current throughput of C&D waste across the four boroughs, at 420,275 tonnes per year, now exceeds forecast C&D arisings at the end of the plan period in 2036 (414,380 tonnes per annum) by +5,895, where there was previously an estimated shortfall of 172,698 tonnes per annum.

## Site appraisal

**3.18** Following the preparation of the Technical Paper by Anthesis consultants, the four partner Boroughs carried out further detailed site appraisal work for all potential sites within the plan area in order to identify a range of suitable, developable waste sites for inclusion in the new SLWP. The methodology used was closely based on policy and guidance set out in the National Planning Policy Framework (NPPF), the National Planning Policy for Waste (NPPW) and the 2020 London Plan.

**3.19** The NPPF's approach to site appraisal is based on the following three elements which determine whether a site is considered to be 'developable':

- (i) suitability – the site is appropriate in terms of planning policy and associated designations;
- (ii) availability – the site has no land ownership constraints;
- (iii) viability – the site could be considered financial viable to develop.

### Suitability

**3.20** The suitability criteria used for the purpose of appraising potential waste sites are set out below in Table 3.3 together with the scoring system. These are derived from the criteria set out in Appendix B of the NPPW but incorporating amendments to reflect the context of the plan area.

**3.21** Some of the potential waste sites are quite large and so are surrounded by a lot of different use and this creates a bias against large sites where proximity criteria are involved. Consequently, large sites are only marked down for proximity or being adjacent to sensitive receptors where the land use has a significant boundary with the site.

**3.22** The maximum suitability score for any particular site is 50.

**Table 3.3 Site Suitability Criteria and Scoring**

| Suitability Criterion Used                                      | Scoring System  | Relevant NPPF Definition  |
|---|---|---------------------------|
| <b>Water quality (SPZ)</b>                                      | 5 - Not in SPZ <sup>12</sup> or in SPZ3<br>3 - In SPZ2<br>1 - In SPZ1                         | (1) water quality         |
| <b>Flood risk management (Flood)</b>                            | 5 - Flood Zone 1<br>3 - Flood Zone 2<br>1 - Flood Zone 3                                      | (a) flood risk management |
| <b>Metropolitan Open Land and Green Belt (MOL/GB)</b>           | 5 - Not adjacent to MOL/Green Belt<br>3 - Adjacent to MOL/Green Belt<br>1 - In MOL/Green Belt | (c) visual impacts        |
| <b>Site of Interest for Nature Conservation (SINC)</b>          | 5 - Not adjacent to a SINC<br>3 - Adjacent to a SINC<br>1 - Within a SINC                     | (d) nature conservation   |
| <b>Conservation Area or Scheduled Ancient Monument (CA/SAM)</b> | 5 - Not adjacent to a CA or SAM<br>3 - Adjacent to a CA or SAM<br>1 - Within a CA             | (e) historic environment  |
| <b>Strategic Road Network (SRN)</b>                             | 5 - Direct access to Strategic Road Network<br>3 - Access to Strategic Road Network without   | (f) traffic and access    |

<sup>12</sup> Source Protection Zone

| Suitability Criterion Used               | Scoring System  | Relevant NPPF Definition  |
|--|---|---|
|  | going through residential areas<br>1 - Access to Strategic Road Network going through residential areas   |   |
| <b>Sustainable Transport (Sus Trans)</b> | 5 - Access to a sustainable transport network<br>1 - No access to sustainable transport network   | (fii) traffic and access  |
| <b>Sensitive Receptors (Sens Rec)</b>    | 15 - Not adjacent to sensitive receptors (residential, schools, hospitals)<br>7 - Adjacent to sensitive receptors (residential, schools, hospitals) | (g) air emissions (h) odours (i) vermin and birds; (j) noise, light & vibration; (k) litter (l) land use conflict |
| <b>SUITABILITY SCORE MAXIMUM</b>         | <b>50</b>   |   |

#### Availability and Viability

**3.23** The scoring system used for appraising site availability and viability is set out below in Table 9.2. The maximum respective scores for each of these criteria is 25, making 50 in total.

**3.24** An existing operational waste site scores highly because its very existence is considered to provide availability and viability. Large industrial areas which already include existing waste facilities score more highly than those which do not include existing waste facilities. The rationale for this is to reflect the fact that industrial land values vary across the plan area and those estates which are lower in value tend to have waste facilities which are more marginal in terms of profitability. This is considered to be a more reliable indicator of viability and availability than a notional viability assessments.

**Table 9.2 Site Availability and Viability Criteria**

| Suitability Criterion Used        | Scoring System   |
|-----------------------------------|--|
| <b>Availability</b>               | 25 - Existing site<br>15 - Existing sites within or nearby<br>5 - No existing sites within or nearby |
| <b>AVAILABILITY SCORE MAXIMUM</b> | 25   |
| <b>Viability</b>                  | 25 - Existing site<br>15 - Existing sites within or nearby<br>5 - No existing site within or nearby  |
| <b>VIABILITY SCORE MAXIMUM</b>    | 25   |
| <b>Total combined score</b>       | <b>50</b>  |

#### Overall site appraisal score

**3.25** For each site appraised, a total score out of 100 was obtained by adding the sub-totals for site suitability (50), availability (25) and viability (25).

**3.26** The results of appraisal for all potential waste sites considered in the preparation of the Draft SLWP are presented alongside the detailed flood risk assessment and sequential test conclusions in Section 4 of this document (see Table 4.1).



## 4. Sequential testing of potential waste sites

**4.1.** Table 4.1 presents the results of the Sequential Test for all potential waste sites and broad locations considered as part of the preparation of the Draft South London Waste Plan (SLWP). This includes an assessment of fluvial flood risk affecting each site using the Environment Agency's (EA) Flood Map for Planning<sup>13</sup> to map the extent of EA Flood Zones 1, 2 and 3 (in terms of the percentage of each site at 'low', 'medium' and 'high' risk respectively) and sequential test conclusions.

**4.2.** The flood risk assessment and sequential test conclusions are presented alongside the site appraisal scores indicating the suitability, availability and viability of each site.

**4.3.** In determining whether to carry forward each potential waste site or broad location for inclusion in the the Draft SLWP, the four boroughs took account a number of important factors alongside flood risk issues. These included:

- the need for the SLWP to designate further waste sites and management capacity in addition to existing waste sites which are currently in operation in the plan area, As outlined above in Section 3, existing capacity for managing housing and commercial & industrial (HCI) waste within South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595 tpa) and existing C&D capacity (420,275) exceeds forecast C&D arisings in 2036 (414,380 tpa) by +5,895 tpa;
- the suitability, availability and viability of each potential waste site or broad area as evidenced through the site appraisal process (see scores below in Table 4.1);
- the need to provide sufficient land for (non-waste) employment uses within industrial locations (this is particularly important in LB Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and
- for existing waste management operations which are located within areas of higher flood risk and where a planning permission has already been granted, the fact that a site specific Flood Risk Assessment (FRA) will already have been prepared and approved by the relevant local planning authority.

**4.4.** Currently operational waste management sites within the plan area which are proposed to be carried forward and safeguarded in the Draft SLWP (Submission Version) are shaded in green. Where a particular site, or broad location, has been deleted from further consideration, the reasons for this decision are set out in the final column of Table 4.1

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<sup>13</sup> the EA's Flood Map for Planning (Rivers and Sea) is available at <https://flood-map-for-planning.service.gov.uk/>






## SITE APPRAISAL AND SEQUENTIAL TEST FOR POTENTIAL WASTE SITES WITH THE SLWP AREA




Table 4.1: Low Risk: Potential sites and broad locations at low risk of flooding (located wholly in Flood Zone 1)



| SITE DETAILS   |                                       | SITE APPRAISAL <sup>14</sup> |             |              |             | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |            |  |   |
|--|---------------------------------------|------------------------------|-------------|--------------|-------------|-----------------------|-----------------|--------------|--------------|-------------------------|------------|--|---|
| Site Ref. and Address  | Type                                  | Area (ha)                    | Suitability | Availability | Via-ability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| <b>Site C1:</b><br><b>Able Waste Services</b><br>42 Imperial Way,<br>CR0 4R<br><b>CROYDON</b>                                      | Existing (Transfer & Treatment – C&D) | 0.45                         | 36          | 25           | 25          | 86                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future applications for waste uses (including site intensification).<br><b>SITE C1 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>          |
| <b>Site C4:</b><br><b>Days Aggregates</b><br>Purley Depot,<br>Station Yard,<br>Approach Road, Purley,<br>CR8 2AL<br><b>CROYDON</b> | Existing (Transfer & Treatment – C&D) | 2.0                          | 36          | 25           | 25          | 86                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE C4 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |

<sup>14</sup> See Section 9 of Sustainability Appraisal Report on 'Identifying and Appraising Waste Sites' for full details of the outcome of site appraisal

| SITE DETAILS  |  | SITE APPRAISAL <sup>14</sup> |             |              |           | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |            |  |   |
|---|--|------------------------------|-------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|-------------------------|------------|--|---|
| Site Ref. and Address   | Type   | Area (ha)                    | Suitability | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| <b>Site C6:</b><br><b>Fishers Farm Reuse and Recycling Centre</b><br>North Downs Road, New Addington, CRO 0LF<br><b>CROYDON</b> | Existing (Transfer [Household Waste Amenity Site] – HCI) | 0.2                          | 28          | 25           | 25        | 78                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE C6 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site C7:</b><br><b>Henry Woods Waste Mgmt</b><br>Land Adj To Unit 9, Mill Lane Trading Est, CRO 4AA<br><b>CROYDON</b>        | Existing (Transfer and Treatment)                        | 0.7                          | 42          | 25           | 25        | 92                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE C7 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site C8:</b><br><b>New Era Metals,</b><br>51 Imperial Way<br>CRO 4RR<br><b>CROYDON</b>                                       | Existing (Recycling and Reuse – HCI)                     | 0.4                          | 42          | 25           | 25        | 92                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE C8 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |



| SITE DETAILS  |  | SITE APPRAISAL <sup>14</sup> |             |              |           | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |            |  |  |
|---|--|------------------------------|-------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|-------------------------|------------|--|--|
| Site Ref. and Address   | Type   | Area (ha)                    | Suitability | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site C9:</b><br><b>Pear Tree Farm</b><br>Featherbed Lane,<br>CRO 9AA<br><b>CROYDON</b>                 | Existing (Transfer – HCI and C&D)                  | 1.8                          | 32          | 25           | 25        | 82                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future applications for waste uses (including for intensification).<br><b>SITE C9 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>                          |
| <b>Site C11:</b><br><b>Safety-Kleen</b><br>Unit 6b,<br>Redlands,<br>Coulson,<br>CR5 2HT<br><b>CROYDON</b> | Existing (Transfer – Hazardous)                    | 0.3                          | 40          | 25           | 25        | 90                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'more vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including proposals for site intensification).<br><b>SITE C11 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site C2:</b><br><b>Croydon Car Spares,</b><br>111 Aurelia Road,<br>CRO 3BF<br><b>CROYDON</b>           | Existing (Recycling and reuse – HCI and hazardous) | 0.05                         | 30          | 5            | 5         | 40                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  | <b>ALTHOUGH AT LOW FLOOD RISK, SITE C2 WAS DELETED FROM FURTHER CONSIDERATION FOLLOWING THE SLWP 'ISSUES AND PREFERRED OPTIONS' STAGE BECAUSE:</b><br>• IT IS CLOSED;<br>• IT IS LOCATED DIRECTLY ADJACENT TO TWO DWELLINGS;<br>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&D ARISING.  |

| SITE DETAILS   |          | SITE APPRAISAL <sup>14</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              |              | SEQUENTIAL TEST OUTCOME |            |  |
|--|----------|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|--------------|-------------------------|------------|--|
| Site Ref. and Address  | Type     | Area (ha)                    | Suitability | Availability | Via-ability           | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  |
| Site C3:<br>Curley Skip Hire,<br>rear of 64 Northwood Rd<br>CR7 8HQ<br>CROYDON | Existing | 0.05                         | 34          | 5            | 5                     | 44          | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   |
| Purley Way<br>North SIL (Part 1)<br>CROYDON                                    | SIL      | 71.4 (total area)            | 44          | 5            | 5                     | 54          | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  |

ALTHOUGH AT LOW FLOOD RISK, SITE C3 WAS DELETED FROM FURTHER CONSIDERATION FOLLOWING THE SLWP 'ISSUES AND PREFERRED OPTIONS' STAGE BECAUSE::



- IT IS CURRENTLY CONTRIBUTING NOTHING TO THE COMBINED APPORTIONMENT TARGETS; IT IS LOCATED DIRECTLY ADJACENT TO EXISTING AND PROPOSED RESIDENTIAL USES;
- IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&D ARISING.

at 'low' risk of flooding arising from site appraisal (Table 2.1), this area is considered unsuitable/ unavailable for future waste use due to its redevelopment /allocation for other uses



- existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and
- existing C&D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.



**ALTHOUGH AT LOW FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:**

- IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND
- IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&D ARISING.



| SITE DETAILS   |      |                          | SITE APPRAISAL <sup>14</sup> |              |           | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |            |  |   |
|--|------|--------------------------|------------------------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|-------------------------|------------|--|---|
| Site Ref. and Address  | Type | Area (ha)                | Suitability                  | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| Purley Way South SIL (Part 1) <sup>15</sup> CROYDON                  | SIL  | 33.3 (total area of SIL) | 38                           | 15           | 15        | 68                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | <ul style="list-style-type: none"> <li>at 'low' risk of flooding arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable for future waste use</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity exceeds forecast arisings in 2036.</li> </ul> <p><b>ALTHOUGH AT LOW FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b></p> <ul style="list-style-type: none"> <li>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT</li> </ul> |
| Purley Way South Strategic Industrial Location (SIL) -Part 2 CROYDON | SIL  | 33.3 (total area of SIL) | 38                           | 15           | 15        | 68                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  | <ul style="list-style-type: none"> <li>at 'low' risk of flooding arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable for future waste use</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity exceeds forecast arisings in 2036.</li> </ul> <p><b>ALTHOUGH AT LOW FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b></p> <ul style="list-style-type: none"> <li>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT</li> </ul> |




<sup>15</sup> Purley Way, Lysander Road and Imperial Way Industrial Area



| SITE DETAILS   |      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              |            | SEQUENTIAL TEST OUTCOME  |   |
|--|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|------------|--|---|
| Site Ref. and Address                                    | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site  |   |
| Maripit Lane<br>(Ullswater Industrial Estate)<br>CROYDON | SIL  | 20.0      | 42                           | 15           | 15        | 72          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |   | This site is at 'low' risk of flooding. However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929, 750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |
| Thornton Road Industrial Estate<br>CROYDON               | LSIL | 4.7       | 38                           | 5            | 5         | 48          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |  | This site is at 'low' risk of flooding. However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929, 750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |

| SITE DETAILS                           |      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|--|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address                  | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 |                         | FLOOD RISK   | Flood Zone Extents Affecting the Site  |
| Union Road Industrial Estate CROYDON   | LSIL | 3.3       | 38                           | 5            | 5         | 48          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |   | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FUTURE C&amp;D ARISING</li> </ul> |
| Selsdon Road Industrial Estate CROYDON | LSIL | 6.7       | 36                           | 5            | 5         | 46          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |  | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING</li> </ul>  |







| SITE DETAILS                                     |      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              |            | SEQUENTIAL TEST OUTCOME  |   |
|--|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|------------|--|---|
| Site Ref. and Address                            | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site  |   |
| Gloucester Road Industrial Estate (East) CROYDON | LSIL | 2.6       | 44                           | 5            | 5         | 54          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |   | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b><br><ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING</li> </ul> |
| Gloucester Road Industrial Estate (West) CROYDON | LSIL | 1.5       | 38                           | 5            | 5         | 48          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |  | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b><br><ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING</li> </ul> |

| SITE DETAILS   |                                      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |   |  |
|--|--------------------------------------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|---|--|
| Site Ref. and Address  | Type                                 | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 |                         | FLOOD RISK  | Flood Zone Extents Affecting the Site  |
| <b>Vulcan Way Industrial Estate CROYDON</b>  | LSIL                                 | 9.1       | 28                           | 5            | 5         | 38          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |    | This area is at 'low' risk of flooding. However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE OR 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING</li> </ul> |
| <b>Site K2: Genuine Solutions, Solutions House, Unit 1A, 223 Hook Rise South, KT6 7LD KINGSTON</b> | Existing (Recycling and reuse - HCI) | 0.3       | 46                           | 25           | 25        | 96          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br><br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE K2 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>  |
| <b>Site K3: Kingston R&amp;R Centre Chapel Mill Road, off Villiers Rd, KT1 3GZ KINGSTON</b>        | Existing (Transfer - HCI)            | 0.4       | 38                           | 25           | 25        | 88          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br><br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE K3 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>  |




| SITE DETAILS   |                           | SITE APPRAISAL <sup>14</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME |              |            |   |  |
|--|---------------------------|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|-------------------------|--------------|------------|---|--|
| Site Ref. and Address  | Type                      | Area (ha)                    | Suitability | Availability | Viability             | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2            | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site   | SEQUENTIAL TEST OUTCOME  |
| <b>Site K4:</b><br><b>Kingston Waste Transfer Station</b><br>Chapel Mill Road, off Villiers Road, KT1 3GZ<br><b>KINGSTON</b> | Existing (Transfer – HCI) | 1.6                          | 38          | 25           | 25                    | 88          | Less vulnerable | 100%         | 0%                      | 0%           | <b>LOW</b> |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br><br>Site at <b>low risk</b> of fluvial flooding<br><br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><br><b>SITE K4 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>  |
| <b>Barwell Business Park Strategic Industrial Location (SIL)</b><br><b>KINGSTON</b>  | SIL                       | -                            | 48          | 5            | 5                     | 58          | Less vulnerable | 100%         | 0%                      | 0%           | <b>LOW</b> |  | This broad area is at 'low' risk of flooding.<br><br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING</li> </ul> |




| SITE DETAILS   |      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |   |
|--|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|---|
| Site Ref. and Address  | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  |   |
| Chessington Industrial Estate Strategic Industrial Location (SIL) KINGSTON | SIL  | -         | 36                           | 15           | 15        | 66          | Less vulnerable       | 100%         | 0%           | 0%           | LOW                     |   | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |
| Cambridge Road/Hampden Road Industrial Estate KINGSTON                     | LSIL | -         | 34                           | 5            | 5         | 44          | Less vulnerable       | 100%         | 0%           | 0%           | LOW                     |  | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |



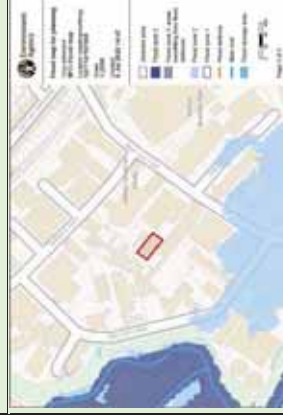
| SITE DETAILS                            |      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address                   | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  |  |
| Canbury Park Industrial Estate KINGSTON | LSIL | -         | 34                           | 5            | 5         | 44          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |   | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b><br><ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |
| Red Lion Industrial Estate KINGSTON     | LSIL | -         | 34                           | 5            | 5         | 44          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |  | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b><br><ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |




| SITE DETAILS                                     |      |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |   |
|--|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|---|
| Site Ref. and Address                            | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 |                         | FLOOD RISK   | Flood Zone Extents Affecting the Site   |
| St George's Industrial Estate<br><b>KINGSTON</b> | LSIL | -         | 34                           | 5            | 5         | 44          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |   | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |
| Silverglade Business Park<br><b>KINGSTON</b>     | LSIL | -         | 34                           | 5            | 5         | 44          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |  | This broad area is at 'low' risk of flooding.<br>However, existing capacity for HCI in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecasts in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |



| SITE DETAILS  |   |           | SITE APPRAISAL <sup>14</sup> |              |             |             | FLOOD RISK ASSESSMENT |              |              |              |            |  | SEQUENTIAL TEST OUTCOME   |
|---|---|-----------|------------------------------|--------------|-------------|-------------|-----------------------|--------------|--------------|--------------|------------|--|---|
| Site Ref. and Address   | Type  | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| <b>Site M1:</b><br>B&T@Work<br>Unit 5c,<br>Wandle<br>Way,<br>CR4 4NA<br><b>MERTON</b>   | Existing<br>(Transfer<br>and<br>recycling –<br>HCI)                   | 0.06      | 44                           | 25           | 25          | 94          | Less<br>vulnerable    | 100%         | 0%           | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M1 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site M4:</b><br>Garth Road<br>Re-use &<br>Recycling<br>Centre,<br>66-69<br>Amenity Way,<br>Garth Road,<br>SM4 4AX<br><b>MERTON</b> | Existing<br>(Household<br>Waste<br>Amenity<br>Site –<br>Existing)     | 0.7       | 36                           | 25           | 25          | 86          | Less<br>vulnerable    | 100%         | 0%           | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M4 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site M5:</b><br>Garth Road<br>Transfer<br>Station,<br>66-69<br>Amenity Way,<br>Garth Road,<br>SM4 4AX<br><b>MERTON</b>             | Existing<br>(Transfer -<br>LA<br>collected<br>waste and<br>hazardous) | 0.45      | 36                           | 25           | 25          | 86          | Less<br>vulnerable    | 100%         | 0%           | 0%           | <b>LOW</b> |  | Site currently in use for waste purposes which are classified as 'more vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M5 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |




| SITE DETAILS  |  |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              |            |  | SEQUENTIAL TEST OUTCOME  |
|---|--|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|------------|--|--|
| Site Ref. and Address   | Type                                     | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site M7:</b><br><b>LMD Waste Management (Abbey Ind Estate),</b><br>Willow Lane,<br>CR4 4NA<br><b>MERTON</b>  | Existing (Transfer with treatment – C&D) | 0.06      | 44                           | 25           | 25        | 94          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'more vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M7 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>  |
| <b>Site M9:</b><br><b>Maguire Skips (Wandle Way)</b><br>Storage Yard<br>Wandle Way,<br>CR4 4NB<br><b>MERTON</b> | Existing (Transfer – C&D)                | 0.2       | 34                           | 25           | 25        | 84          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M9 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>  |
| <b>Site M10:</b><br><b>Powerday (Weir Court)</b><br>36 Weir Court,<br>SW19 8UG<br><b>MERTON</b>                 | Existing (Transfer – C&D)                | 0.3 ha    | 42                           | 25           | 25        | 92          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b> |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M10 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |






| SITE DETAILS  |   | SITE APPRAISAL <sup>14</sup> |             |              |           | FLOOD RISK ASSESSMENT |                 |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|---|------------------------------|-------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address   | Type  | Area (ha)                    | Suitability | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site M11:</b><br>Morden Transfer Station<br>Amenity Way,<br>SM4 4AX<br>MERTON                                | Existing – (Transfer – C&D and HCI)             | 0.8                          | 34          | 25           | 25        | 84                    | Less vulnerable | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M11 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site M12:</b><br>NJB Recycling<br>77 Weir Road,<br>SW19 8UG<br>MERTON  | Existing – (Transfer – C&D)                     | 0.3                          | 36          | 25           | 25        | 86                    | Less vulnerable | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M12 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |
| <b>Site M13:</b><br>One Waste Clearance<br>Unit 2 Abbey Industrial Estate, 24 Willow Lane,<br>CR4 4NA<br>MERTON | Existing (Transfer and Recycling – C&D and HCI) | 0.1                          | 44          | 25           | 25        | 94                    | Less vulnerable | 100%         | 0%           | 0%           | <b>LOW</b>              |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M13 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b> |




| SITE DETAILS   |                                 |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              |            | SEQUENTIAL TEST OUTCOME  |  |
|--|---------------------------------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|------------|--|--|
| Site Ref. and Address  | Type                            | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site M14: Reston Waste Transfer and Recovery</b><br>Unit 6,<br>Weir Road<br>SW19 8UG<br><b>MERTON</b>           | Existing                        | 0.43      | <b>36</b>                    | 25           | 25        | <b>86</b>   | Less vulnerable       | <b>100%</b>  | 0%           | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE M14 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>   |
| <b>M18 Wandle Waste Management</b><br>Unit 7, Abbey Industrial Estate,<br>Willow Lane,<br>CR4 4NA<br><b>MERTON</b> | Existing (Transfer – Hazardous) | 0.07      | <b>44</b>                    | 25           | 25        | <b>94</b>   | Less vulnerable       | <b>100%</b>  | 0%           | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'more vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for hazardous or any other waste uses (including for site intensification).<br><b>SITE M19 IS THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP</b>  |
| <b>Dundonald Road Industrial Estate</b><br><b>MERTON</b>   | LSIL                            | 3.7       | <b>36</b>                    | 5            | 5         | <b>46</b>   | Less vulnerable       | <b>100%</b>  | 0%           | 0%           | <b>LOW</b> |  | This broad area is at 'low' risk of flooding. However, existing capacity for HCl in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |




| SITE DETAILS                                   |      |           | SITE APPRAISAL <sup>14</sup> |              |               | FLOOD RISK ASSESSMENT |              |              |            | SEQUENTIAL TEST OUTCOME               |  |
|--|------|-----------|------------------------------|--------------|---------------|-----------------------|--------------|--------------|------------|---------------------------------------|--|
| Site Ref. and Address                          | Type | Area (ha) | Suitability                  | Availability | Vulnerability | Flood Zone 1          | Flood Zone 2 | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site |  |
| Gap Road Industrial Estate MERTON              | LSIL | 3.8       | 38                           | 5            | 5             | Less vulnerable       | 100%         | 0%           | 0%         | <b>LOW</b>                            |  <p>This broad area is at 'low' risk of flooding. However, existing capacity for HCl in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&amp;D capacity exceeds forecast arisings in 2036.</p> <p><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b></p> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul>  |
| Rainbow Industrial Estate (Raynes Park) MERTON | LSIL | 3.2       | 34                           | 5            | 5             | Less vulnerable       | 100%         | 0%           | 0%         | <b>LOW</b>                            |  <p>This broad area is at 'low' risk of flooding. However, existing capacity for HCl in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&amp;D capacity exceeds forecast arisings in 2036.</p> <p><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b></p> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |

| SITE DETAILS  |  |           | SITE APPRAISAL <sup>14</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|--|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address   | Type   | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site S1:</b><br><b>777 Recycling Centre,</b><br>154a Beddington Lane<br>CR0 4TE<br><b>SUTTON</b>   | Existing (Recycling and Reuse – HCl and C&D) | 1.0       | 42                           | 25           | 25        | 92          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE S1 IS THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP.</b>                                   |
| <b>Site S2:</b><br><b>Beddington Farmlands Energy Recovery Facility (ERF)</b><br>105 Beddington Lane<br>CR0 4TD<br><b>SUTTON</b>                  | Existing (Energy from Waste – HCl)           | 5.8       | 34                           | 25           | 25        | 84          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including proposals for site intensification).<br><b>SITE S2 THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP.</b>                    |
| <b>Site S3:</b><br><b>Cannon Hygiene, Unit 4,</b><br>Beddington Lane<br>Industrial Estate,<br>109-131 Beddington Lane<br>CR0 4TG<br><b>SUTTON</b> | Existing (Transfer – Hazardous)              | 0.2       | 42                           | 25           | 25        | 92          | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |  | Site currently in use for waste purposes which are classified as 'more vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for hazardous or any other waste uses (including proposals for site intensification).<br><b>SITE S3 THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP.</b> |



| SITE DETAILS   |  | SITE APPRAISAL <sup>14</sup> |             |              |           | FLOOD RISK ASSESSMENT |                 |              |              |              | SEQUENTIAL TEST OUTCOME |  |   |
|--|--|------------------------------|-------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|--------------|-------------------------|--|---|
| Site Ref. and Address  | Type   | Area (ha)                    | Suitability | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| <b>Site S4:</b><br>Croydon Transfer Station<br>Endeavour Way,<br>Beddington Farm Road,<br>CR0 4TD<br><b>SUTTON</b> | Existing (Transfer – HCI)                          | 0.7                          | 42          | 25           | 25        | 92                    | Less vulnerable | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including proposals for site intensification).<br><b>SITE S4 THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP..</b>    |
| <b>Site S6:</b><br>Hydro Cleansing,<br>Hill House,<br>Beddington Farm Road<br>CR0 4XB<br><b>SUTTON</b>             | Existing (Transfer & Treatment - waste-water/CD&E) | 0.2                          | 44          | 25           | 25        | 94                    | Less vulnerable | 100%         | 0%           | 0%           | <b>LOW</b>              |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including proposals for site intensification).<br><b>SITE S6 THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP..</b>    |
| <b>Site S7:</b><br>Kimpton Park Way Civic Amenity Site – HCI)<br>Kimpton Park Way SM3 9QH<br><b>SUTTON</b>         | Existing (Civic Amenity Site – HCI)                | 0.4                          | 44          | 25           | 25        | 94                    | Less vulnerable | 100%         | 0%           | 0%           | <b>LOW</b>              |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including proposals for site intensification).<br><b>SITE S7 THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP.</b> |




| SITE DETAILS   |                                 | SITE APPRAISAL <sup>14</sup> |             |              |           | FLOOD RISK ASSESSMENT |                    |              |              | SEQUENTIAL TEST OUTCOME |            |  |   |
|--|---------------------------------|------------------------------|-------------|--------------|-----------|-----------------------|--------------------|--------------|--------------|-------------------------|------------|--|---|
| Site Ref. and Address  | Type                            | Area (ha)                    | Suitability | Availability | Viability | TOTAL SCORE           | Vulnerability      | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| <b>Site S8 :</b><br><b>King Concrete</b><br>124<br>Beddington<br>Lane CR0 4YZ<br><b>SUTTON</b>                               | Existing<br>(Transfer –<br>C&D) | 0.5                          | 30          | 25           | 25        | 80                    | Less<br>vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including site intensification).<br><b>SITE S8 THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP.</b>               |
| <b>Site S9:</b><br><b>Premier Skip Hire</b><br>Unit 12,<br>Sandiford<br>Road,<br>SM3 9RD<br><b>SUTTON</b>                    | Existing                        | 0.1                          | 46          | 25           | 25        | 96                    | Less<br>vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including proposals for site intensification).<br><b>SITE S9 THEREFORE PROPOSED FOR INCLUSION IN THE DRAFT SLWP.</b> |
| <b>Site S10:</b><br><b>Raven Recycling</b><br>Unit 8-9,<br>Endeavour<br>Way, Beddington Farm<br>Rd, CR0 4TR<br><b>SUTTON</b> | Existing                        | 0.3                          | 42          | 25           | 25        | 92                    | Less<br>vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including for site intensification).<br><b>SITE S10 THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP.</b>              |



| SITE DETAILS  |          | SITE APPRAISAL <sup>14</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME         |              |            |  |  |
|---|----------|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|---------------------------------|--------------|------------|--|--|
| Site Ref. and Address   | Type     | Area (ha)                    | Suitability | Availability | Via-ability           | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2                    | Flood Zone 3 | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site S11:</b><br>TGM Environmental<br>112 Beddington Lane,<br>CR0 4TD<br><b>SUTTON</b>                       | Existing | 0.2                          | 40          | 25           | 25                    | 90          | Less vulnerable | 100%         | 0% (although directly adjacent) | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including for site intensification)<br><b>SITE S11 THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP.</b>  |
| <b>Site S12:</b><br>Country Waste Skip Hire <sup>16</sup><br>79-85 Beddington Lane,<br>CR0 4TH<br><b>SUTTON</b> | Existing | 2.8                          | 36          | 25           | 25                    | 86          | Less vulnerable | 100%         | 0%                              | 0%           | <b>LOW</b> |   | Site currently in use for waste purposes which are classified as 'less vulnerable' to flood risk.<br>Site at <b>low risk</b> of fluvial flooding<br><b>Exceptions Test not required</b> for any future planning applications for waste uses (including for site intensification)<br><b>SITE S12 THEREFORE PROPOSED FOR INCLUSION IN DRAFT SLWP.</b>  |
| <b>Imperial Way Strategic Industrial Location (SIL)</b><br><b>SUTTON</b>  | SIL      | 18.8                         | 40          | 5            | 5                     | 50          | Less vulnerable | 100%         | 0%                              | 0%           | <b>LOW</b> |  | While this location is at <b>low risk</b> of flooding, it has not been carried forward in the Draft SLWP since:<br>• it is considered unsuitable for waste use due to its redevelopment /allocation for other uses<br>• existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and<br>• existing C&D capacity (420,275) exceeds forecast arisings in 2036.<br><b>SITE NOT NEEDED AND UNSUITABLE/UNAVAILABLE FOR WASTE USES AND THEREFORE EXCLUDED FROM SLWP</b> |

<sup>16</sup> site introduced following the SLWP 'Issues and Preferred Options stage'

| SITE DETAILS                          |      |           | SITE APPRAISAL <sup>14</sup> |              |           | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |            |  |  |
|---------------------------------------|------|-----------|------------------------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|-------------------------|------------|--|--|
| Site Ref. and Address                 | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| Croydon Road Industrial Area SUTTON   | LSIL | 0.9       | 38                           | 5            | 5         | 48                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |   | This broad area is at 'low' risk of flooding. However, existing capacity for HCl in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |
| Gander Green Lane/Abbotts Road SUTTON | LSIL | 0.7       | 36                           | 5            | 5         | 46                    | Less vulnerable | 100%         | 0%           | 0%                      | <b>LOW</b> |  | This broad area is at 'low' risk of flooding. However, existing capacity for HCl in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&D capacity exceeds forecast arisings in 2036.<br><br><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b> <ul style="list-style-type: none"> <li>IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING.</li> </ul> |

| SITE DETAILS                       |      | SITE APPRAISAL <sup>14</sup> |             |              | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |   |  |
|------------------------------------|------|------------------------------|-------------|--------------|-----------------------|--------------|--------------|--------------|-------------------------|---|--|
| Site Ref. and Address              | Type | Area (ha)                    | Suitability | Availability | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site   |  |
| Plumpton Way Trading Estate SUTTON | LSIL | 1.1                          | 34          | 5            | Less vulnerable       | 100%         | 0%           | 0%           | <b>LOW</b>              |  | <p>This broad area is at 'low' risk of flooding. However, existing capacity for HCl in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&amp;D capacity exceeds forecast arisings in 2036.</p> <p><b>ALTHOUGH AT 'LOW' FLOOD RISK, THIS AREA HAS BEEN EXCLUDED FROM THE DRAFT SLWP SINCE:</b></p> <ul style="list-style-type: none"> <li>• IT IS INHERENTLY LESS 'AVAILABLE AND 'VIABLE' COMPARED TO CURRENTLY OPERATIONAL SITES;</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OF FUTURE C&amp;D ARISING..</li> </ul> |


**Table 4.2: Medium Risk: Potential sites and broad locations at medium risk of flooding (wholly or partly in Flood Zone 2)**



| SITE DETAILS  |   |           | SITE APPRAISAL <sup>17</sup> |              |             |             |                 | FLOOD RISK ASSESSMENT |              |              |               |  | SEQUENTIAL TEST OUTCOME  |
|---|---|-----------|------------------------------|--------------|-------------|-------------|-----------------|-----------------------|--------------|--------------|---------------|--|--|
| Site Ref. and Address   | Type  | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE | Vulnerability   | Flood Zone 1          | Flood Zone 2 | Flood Zone 3 | FLOOD RISK    | Flood Zone Extents Affecting the Site  |  |
| <b>C5B: Factory Lane R&amp;R Centre</b><br>Factory Lane,<br>CRO 3RL<br><b>CROYDON</b>           | Existing (Household Waste Amenity Site – HCI) | 0.3       | 42                           | 25           | 25          | 92          | Less vulnerable | 0%                    | 100%         | 0%           | <b>MEDIUM</b> |   | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (90% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT MEDIUM RISK OF FLOODING, SITE C5B INCLUDED IN THE DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECT TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL.</li> </ul> |
| <b>Site C13: Solo Wood Recycling<sup>18</sup></b><br>Factory Lane,<br>CRO 3RL<br><b>CROYDON</b> | Existing (Wood recycling – HCI)               | 0.2       | 42                           | 25           | 25          | 92          | Less vulnerable | 0%                    | 100%         | 0%           | <b>MEDIUM</b> |  | Site in use for waste purposes which are 'less vulnerable' to flood risk<br>Site at <b>medium risk</b> of fluvial flooding (100% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT MEDIUM RISK OF FLOODING, SITE C13 INCLUDED IN THE DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• ALREADY HAS PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA;</li> <li>• IS CURRENTLY OPERATIONAL.</li> </ul>  |



<sup>17</sup> See Section 9 of Sustainability Appraisal Report on 'Identifying and Appraising Waste Sites' for full details of the outcome of site appraisal



<sup>18</sup> site introduced following the issues and preferred options stage





| SITE DETAILS   |      | SITE APPRAISAL <sup>17</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME |              |               |   |   |
|--|------|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|-------------------------|--------------|---------------|---|---|
| Site Ref. and Address  | Type | Area (ha)                    | Suitability | Availability | Via-ability           | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2            | Flood Zone 3 | FLOOD RISK    | Flood Zone Extents Affecting the Site   |   |
| <u>Purley Way</u><br><u>North</u><br><u>Strategic</u><br><u>Industrial</u><br><u>Location</u><br><u>(SIL) - Pt 2</u><br><u>CROYDON</u> | SIL  | 71.4<br>(total area)         | 44          | 5            | 5                     | 54          | Less vulnerable | 80%          | 20%                     | 0%           | <b>MEDIUM</b> |  | <ul style="list-style-type: none"> <li>this area is at 'medium' risk of flooding (20% in FZ 2); arising from site appraisal (Table 2.1), this area is considered unsuitable/ unavailable for future waste use due to its redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT MEDIUM FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED.</b></li> </ul> |



| SITE DETAILS   |                                      |           | SITE APPRAISAL <sup>17</sup> |              |             | FLOOD RISK ASSESSMENT |                 |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|--|--------------------------------------|-----------|------------------------------|--------------|-------------|-----------------------|-----------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address  | Type                                 | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site M2:</b><br><b>European Metal Recycling</b><br>23 Ellis Road,<br>Willow Lane Industrial Estate,<br>CR4 4HX<br><b>MERTON</b> | Existing (Recycling and Reuse – HCI) | 1.0       | 38                           | 25           | 25          | 88                    | Less vulnerable | 10%          | 90%          | 0%           | <b>MEDIUM</b>           |   | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (90% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M2 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b> <ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL...</li> </ul>  |
| <b>Site M3:</b><br><b>Deadman Confidential</b><br>35 Willow Lane,<br>CR4 4NA<br><b>MERTON</b>                                      | Existing (Recycling – HCI)           | 0.4       | 38                           | 25           | 25          | 88                    | Less vulnerable | 0%           | 100%         | 0%           | <b>MEDIUM</b>           |  | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (100% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M3 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b> <ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL...</li> </ul> |



| SITE DETAILS  |                           | SITE APPRAISAL <sup>17</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME |              |               |  |  |
|---|---------------------------|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|-------------------------|--------------|---------------|--|--|
| Site Ref. and Address   | Type                      | Area (ha)                    | Suitability | Availability | Via-ability           | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2            | Flood Zone 3 | FLOOD RISK    | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site M6:</b><br><b>George Killoughery Ltd</b><br>41 Willow Lane,<br>CR4 4NA<br><b>MERTON</b>             | Existing (Transfer – C&D) | 0.8                          | 32          | 25           | 25                    | <b>82</b>   | Less vulnerable | 40%          | 60%                     | 0%           | <b>MEDIUM</b> |   | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (60% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M6 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL</li> </ul>                        |
| <b>Site M8:</b><br><b>LMD Waste Management (Willow Lane)</b><br>32 Willow Lane,<br>CR4 4NA<br><b>MERTON</b> | Existing (Transfer – C&D) | 0.07                         | 38          | 25           | 25                    | <b>88</b>   | Less vulnerable | 0%           | 100%                    | 0%           | <b>MEDIUM</b> |  | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (8% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M8 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FLOOD RISK ASSESSMENT (FRA); AND</li> <li>• IS CURRENTLY OPERATIONAL</li> </ul> |



| SITE DETAILS  |   |           | SITE APPRAISAL <sup>17</sup> |              |           | FLOOD RISK ASSESSMENT |                 |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|---|-----------|------------------------------|--------------|-----------|-----------------------|-----------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address   | Type  | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site M15</b><br><b>Riverside AD Facility</b><br>43 Willow Lane,<br>CR4 4NA<br><b>MERTON</b>    | Existing (Management of mixed garden & kitchen waste – Anaerobic Digestion) | 0.5       | 32                           | 25           | 25        | 82                    | Less vulnerable | 92%          | 8%           | 0%           | <b>MEDIUM</b>           |   | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (8% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M15 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECT TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FLOOD RISK ASSESSMENT (FRA); AND</li> <li>• IS CURRENTLY OPERATIONAL.</li> </ul> |
| <b>Site M16:</b><br><b>Riverside Bio-Treatment</b><br>43 Willow Lane,<br>CR4 4NA<br><b>MERTON</b> | Existing (Composting – HCl)   | 0.4       | 32                           | 25           | 25        | 82                    | Less vulnerable | 92%          | 8%           | 0%           | <b>MEDIUM</b>           |  | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (8% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M16 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECT TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL.</li> </ul>                         |

| SITE DETAILS  |   | SITE APPRAISAL <sup>17</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME |              |               |  |  |
|---|---|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|-------------------------|--------------|---------------|--|--|
| Site Ref. and Address   | Type  | Area (ha)                    | Suitability | Availability | Viability             | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2            | Flood Zone 3 | FLOOD RISK    | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| Site M17<br>UK and European (Ranns) Construction<br>Unit 3-5,<br>39 Willow Lane,<br>CR4 8NA<br>MERTON | Existing (Treatment of C&D to produce soil) | 0.5                          | 38          | 25           | 25                    | 88          | Less vulnerable | 0%           | 100%                    | 0%           | <b>MEDIUM</b> |   | Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Site at <b>medium risk</b> of fluvial flooding (100% of area in FZ 2).<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M17 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b><br><ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECT TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL.</li> </ul>   |
| Prince Georges Road Industrial Estate<br>MERTON   | SIL   | 6.2                          | 34          | 5            | 5                     | 44          | Less vulnerable | 85%          | 15%                     | 0%           | <b>MEDIUM</b> |  | <ul style="list-style-type: none"> <li>• this site is at 'medium' risk of flooding (20% in FZ 2);</li> <li>• existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>• existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS SITE HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>• IT IS AT 'MEDIUM' FLOOD RISK;</li> <li>• IT IS LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</li> </ul> |




| SITE DETAILS                                |      |           | SITE APPRAISAL <sup>17</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address                       | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  |  |
| Durnsford Road (A) Industrial Estate MERTON | LSIL | 2.4       | 40                           | 5            | 5         | 50          | Less vulnerable       | 98%          | 2%           | 0%           | <b>MEDIUM</b>           |   | <ul style="list-style-type: none"> <li>this area is at 'medium' risk of flooding (20% in FZ 2); arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment a existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 <b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></li> <li><b>IT IS AT MEDIUM FOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> |
| Streatham Road Industrial Estate MERTON     | LSIL | 5.3       | 40                           | 5            | 5         | 50          | Less vulnerable       | 80%          | 20%          | 0%           | <b>MEDIUM</b>           |  | <ul style="list-style-type: none"> <li>this area is at 'medium' risk of flooding (20% in FZ 2); existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> <li><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></li> <li><b>IT IS AT 'MEDIUM' FLOOD RISK;</b></li> <li><b>IT IS LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul>   |

| SITE DETAILS  |   | SITE APPRAISAL <sup>17</sup> |             |              | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|---|------------------------------|-------------|--------------|-----------------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address   | Type  | Area (ha)                    | Suitability | Availability | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  |  |
| <b>Nelson Trading Estate MERTON</b>   | LSIL  | 2.3                          | 38          | 5            | Less vulnerable       | 75%          | 25%          | 0%           | <b>MEDIUM</b>           |   | <ul style="list-style-type: none"> <li>this area is at 'medium' risk of flooding (25% in FZ 2);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>IT IS AT 'MEDIUM' FLOOD RISK;</li> <li>IT IS LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</li> </ul> |
| <b>Site S5: Hinton Skips</b><br>Rear of 112 Beddington Lane, CR0 4YZ<br><b>SUTTON</b> | Existing (Transfer and treatment of skip waste – C&D) | 0.6                          | 40          | 25           | Less vulnerable       | 85%          | 15%          | 0%           | <b>MEDIUM</b>           |  | <p>Site in use for waste purposes which are 'less vulnerable' to flood risk.</p> <p>Site at medium risk of fluvial flooding (15% of area in FZ 2).</p> <p>Exceptions Test not required for any future planning applications for waste</p> <p><b>ALTHOUGH AT 'MEDIUM' RISK OF FLOODING, SITE M16 HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b></p> <ul style="list-style-type: none"> <li>IS DESIGNATED FOR WASTE USES IN THE SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECT TO THE SEQUENTIAL TEST ALREADY;</li> <li>HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>IS CURRENTLY OPERATIONAL.</li> </ul>  |

| SITE DETAILS                                      |      |           | SITE APPRAISAL <sup>17</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              |               | SEQUENTIAL TEST OUTCOME  |  |
|---|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|---------------|--|--|
| Site Ref. and Address                             | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK    | Flood Zone Extents Affecting the Site  |  |
| Beddington Strategic Industrial Area (SIL) SUTTON | SIL  | 105.8     | 26                           | 15           | 15        | 56          | Less vulnerable       | 85%          | 15%          | 0%           | <b>MEDIUM</b> |   | <ul style="list-style-type: none"> <li>this area is at 'medium' risk of flooding (20% in FZ 2);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT MEDIUM FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING</b></li> </ul> |
| Hackbridge Industrial Area SUTTON                 | LSIL | 1.3       | 32                           | 5            | 5         | 42          | Less vulnerable       | 40%          | 60%          | 0%           | <b>MEDIUM</b> |  | <ul style="list-style-type: none"> <li>this area is at 'medium' risk of flooding (60% in FZ 2);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'MEDIUM' FLOOD RISK;</b></li> <li><b>IT IS LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT</b></li> </ul>  |





**Table 4.3: High Risk: Potential sites and broad locations at high risk of flooding (located wholly or partly in Flood Zone 3)**

| SITE DETAILS   |                           | SITE APPRAISAL <sup>19</sup> |             |              | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |   |   |
|--|---------------------------|------------------------------|-------------|--------------|-----------------------|--------------|--------------|--------------|-------------------------|---|---|
| Site Ref. and Address  | Type                      | Area (ha)                    | Suitability | Availability | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site   | SEQUENTIAL TEST OUTCOME   |
| <b>Site C5A:</b><br><b>Factory Lane Transfer Station</b><br>Factory Lane,<br>CR0 3RL<br><b>CROYDON</b> | Existing (Transfer – HCI) | 1.2                          | 42          | 25           | 25                    | 0%           | 95%          | 5%           | <b>HIGH</b>             |  | Site at <b>high risk</b> of fluvial flooding (5% of area in FZ 2).<br>Site in use for waste purposes which are ' <b>less vulnerable</b> ' to flood risk.<br><b>Exceptions Test not required</b> for any future planning applications for waste<br><b>ALTHOUGH AT 'HIGH' RISK OF FLOODING, SITE C5A HAS BEEN INCLUDED IN DRAFT SLWP SINCE IT:</b> <ul style="list-style-type: none"> <li>• IS DESIGNATED FOR WASTE USES IN EXISTING SLWP 2012 &amp; HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;</li> <li>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND</li> <li>• IS CURRENTLY OPERATIONAL.</li> </ul> |



<sup>19</sup> See Section 9 of Sustainability Appraisal Report on 'Identifying and Appraising Waste Sites' for full details of the outcome of site appraisal


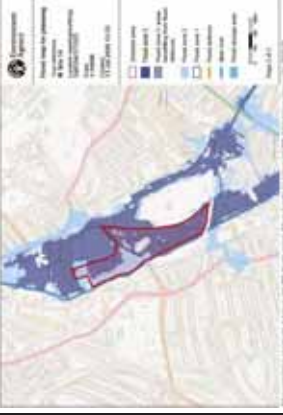


| SITE DETAILS  |   | SITE APPRAISAL <sup>19</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME |              |             |  |  |
|---|---|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|-------------------------|--------------|-------------|--|--|
| Site Ref. and Address   | Type  | Area (ha)                    | Suitability | Availability | Viability             | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2            | Flood Zone 3 | FLOOD RISK  | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| <b>Site C10:</b><br><b>Purley Oaks R&amp;R Centre</b><br>Brighton Road<br>Purley<br>CR8 2BG<br><b>CROYDON</b> | Existing (Transfer – HCI and C&D)                       | 0.2                          | 30          | 25           | 25                    | 80          | Less vulnerable | 10%          | 5%                      | 85%          | <b>HIGH</b> |   | At 'high' risk of flooding (5% in FZ 3).<br>Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Exceptions Test not required for any future planning applications for waste<br>ALTHOUGH AT 'HIGH' RISK OF FLOODING, SITE C5A IS INCLUDED IN DRAFT SLWP SINCE IT:<br>• IS DESIGNATED IN THE EXISTING SLWP 2012 & HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;<br>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND<br>• IS CURRENTLY OPERATIONAL. |
| <b>Site C12:</b><br><b>Stubbs Mead Depot</b><br>Factory Lane,<br>CR0 3RL<br><b>CROYDON</b>                    | Existing (Vehicle depot related to HH waste collection) | 2.7                          | 42          | 25           | 25                    | 92          | Less vulnerable | 15%          | 84%                     | 1%           | <b>HIGH</b> |  | At 'high' risk of flooding (1% in FZ 2).<br>Site in use for waste purposes which are 'less vulnerable' to flood risk.<br>Exceptions Test not required for any future planning applications for waste<br>ALTHOUGH AT 'HIGH' RISK OF FLOODING, SITE C12 IS INCLUDED IN DRAFT SLWP SINCE IT:<br>• IS DESIGNATED IN THE EXISTING SLWP 2012 & HAS THEREFORE BEEN SUBJECTED TO THE SEQUENTIAL TEST ALREADY;<br>• HAS PLANNING PERMISSION AND HAS THEREFORE BEEN SUBJECT TO A SITE SPECIFIC FRA; AND<br>• IS CURRENTLY OPERATIONAL. |



| SITE DETAILS   |          |                          | SITE APPRAISAL <sup>19</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |   |
|--|----------|--------------------------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|---|
| Site Ref. and Address  | Type     | Area (ha)                | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| Purley Way North Strategic Industrial Location (SIL) - Pt 3 CROYDON    | SIL      | 71.4 (total area of SIL) | 44                           | 5            | 5         | 54          | Less vulnerable       | 50%          | 30%          | 20%          | <b>HIGH</b>             |   | <ul style="list-style-type: none"> <li>this area is at 'high' risk of flooding (20% in FZ 3);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> |
| Site K1: Chessington Equestrian Centre, Clayton Road, KT9 1NN KINGSTON | Existing | 9.9                      | 42                           | 5            | 5         | 52          | Less vulnerable       | 100%         | 98%          | 2%           | <b>HIGH</b>             |  | <p>Site currently in use for waste purposes which are classified as 'less vulnerable' to flooding.</p> <p>While a small portion of this site is at high risk of fluvial flooding (2% within FZ 3), the Exceptions Test would not be required for any future planning applications for waste uses.</p> <p><b>HOWEVER, SITE K1 WAS DELETED FROM FURTHER CONSIDERATION FOLLOWING THE ISSUES AND PREFERRED OPTIONS STAGE BECAUSE IT IS IN TEMPORARY USE AND CLOSING SOON.</b></p>   |


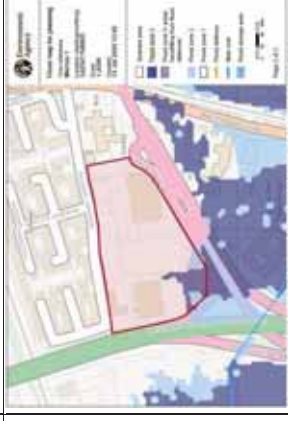
| SITE DETAILS   |      | SITE APPRAISAL <sup>19</sup> |             |              | FLOOD RISK ASSESSMENT |             |                 |              | SEQUENTIAL TEST OUTCOME |              |             |   |
|--|------|------------------------------|-------------|--------------|-----------------------|-------------|-----------------|--------------|-------------------------|--------------|-------------|---|
| Site Ref. and Address  | Type | Area (ha)                    | Suitability | Availability | Via-ability           | TOTAL SCORE | Vulnerability   | Flood Zone 1 | Flood Zone 2            | Flood Zone 3 | FLOOD RISK  | Flood Zone Extents Affecting the Site   |
| St John's Industrial Estate<br><b>KINGSTON</b>                   | LSIL | -                            | 38          | 5            | 5                     | 48          | Less vulnerable | 95%          | 5%                      | 5%           | <b>HIGH</b> |  <ul style="list-style-type: none"> <li>• this area is at 'high' risk of flooding (5% in FZ 3);</li> <li>• existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>• IT IS AT 'HIGH' FLOOD RISK;</li> <li>• IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</li> </ul>   |
| Fairfield Trade Park/<br>Kingsmill<br>Bus Pk3<br><b>KINGSTON</b> | LSIL | -                            | 30          | 15           | 15                    | 60          | Less vulnerable | 50%          | 20%                     | 30%          | <b>HIGH</b> |  <ul style="list-style-type: none"> <li>• this area is at 'high' risk of flooding (30% in FZ 3);</li> <li>• existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>• IT IS AT 'HIGH' FLOOD RISK;</li> <li>• IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</li> <li>• IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</li> </ul> |



| SITE DETAILS   |      |           | SITE APPRAISAL <sup>19</sup> |              |             | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |             |  |   |
|--|------|-----------|------------------------------|--------------|-------------|-----------------------|-----------------|--------------|--------------|-------------------------|-------------|--|---|
| Site Ref. and Address                                      | Type | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK  | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| London Road Industrial Estate<br><b>KINGSTON</b>           | LSIL | -         | 34                           | 5            | 5           | 44                    | Less vulnerable | 45%          | 50%          | 5%                      | <b>HIGH</b> |   | <ul style="list-style-type: none"> <li>this area is at 'high' risk of flooding (5% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>IT IS AT 'HIGH' FLOOD RISK;</li> <li>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</li> </ul> |
| South Wimbledon Business Park (Morden Rd)<br><b>MERTON</b> | SIL  | 31.7      | 34                           | 5            | 5           | 44                    | Less vulnerable | 98%          | 1%           | 1%                      | <b>HIGH</b> |  | <ul style="list-style-type: none"> <li>this area is at 'high' risk of flooding (1% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>IT IS AT 'HIGH' FLOOD RISK;</li> <li>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</li> <li>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</li> </ul> |



| SITE DETAILS  |      |           | SITE APPRAISAL <sup>19</sup> |              |             | FLOOD RISK ASSESSMENT |                 |              |              |              | SEQUENTIAL TEST OUTCOME |  |
|---|------|-----------|------------------------------|--------------|-------------|-----------------------|-----------------|--------------|--------------|--------------|-------------------------|--|
| Site Ref. and Address                                     | Type | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  |
| Durnsford Road Strategic Industrial Location (SIL) MERTON | SIL  | 18.5      | 38                           | 15           | 15          | 68                    | Less vulnerable | 95%          | 4%           | 1%           | <b>HIGH</b>             |  <ul style="list-style-type: none"> <li>• this area is at 'high' risk of flooding (1% in FZ 3);</li> <li>• arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>• existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>• existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5.895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>• <b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li>• <b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li>• <b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> |
| Plough Lane Strategic Industrial Location (SIL) MERTON    | SIL  | 13.8      | 28                           | 15           | 15          | 58                    | Less vulnerable | 5%           | 20%          | 75%          | <b>HIGH</b>             |  <ul style="list-style-type: none"> <li>• this area is at 'high' risk of flooding (1% in FZ 3);</li> <li>• existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li>• <b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li>• <b>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</b></li> <li>• <b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.</b></li> </ul>  |





| SITE DETAILS  |      |           | SITE APPRAISAL <sup>19</sup> |              |           |             | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |  |
|---|------|-----------|------------------------------|--------------|-----------|-------------|-----------------------|--------------|--------------|--------------|-------------------------|--|--|
| Site Ref. and Address   | Type | Area (ha) | Suitability                  | Availability | Viability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| Burlington Way (Beverley Way) Strategic Industrial Locaton (SIL) MERTON | SIL  | 7.3       | 36                           | 5            | 5         | 46          | Less vulnerable       | 0%           | 98%          | 2%           | <b>HIGH</b>             |   | <ul style="list-style-type: none"> <li>this area is at 'high' risk of flooding (1% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL WASTE SITES</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.</b></li> </ul>   |
| Willow Lane Strategic Industrial Location (SIL) MERTON                  | SIL  | 41.3      | 28                           | 15           | 15        | 58          | Less vulnerable       | 65%          | 30%          | 5%           | <b>HIGH</b>             |  | <ul style="list-style-type: none"> <li>this area is at 'high' risk of flooding (5% in FZ 3);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> |

| SITE DETAILS   |      | SITE APPRAISAL <sup>19</sup> |             |              | FLOOD RISK ASSESSMENT |              |              |              | SEQUENTIAL TEST OUTCOME |  |
|--|------|------------------------------|-------------|--------------|-----------------------|--------------|--------------|--------------|-------------------------|--|
| Site Ref. and Address  | Type | Area (ha)                    | Suitability | Availability | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK              | Flood Zone Extents Affecting the Site  |
| Hallowfield Way<br>Strategic Industrial Location (SIL)<br>MERTON | SIL  | 7.9                          | 38          | 5            | Less vulnerable       | 95%          | 4%           | 1%           | <b>HIGH</b>             |  <p>                     • this area is at 'high' risk of flooding (3% in FZ 3);<br/>                     • existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and<br/>                     • existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa<br/><br/> <b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b><br/>                     • IT IS AT 'HIGH' FLOOD RISK;<br/>                     • IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL SITES;<br/>                     • IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.                 </p>  |
| Bushey Road Industrial Estate<br>MERTON                          | LSIL | 3.7                          | 42          | 5            | Less vulnerable       | 90%          | 3%           | 7%           | <b>HIGH</b>             |  <p>                     • this area is at 'high' risk of flooding (7% in FZ 3);<br/>                     • existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and<br/>                     • existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa<br/><br/> <b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b><br/>                     • IT IS AT 'HIGH' FLOOD RISK;<br/>                     • IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL SITES;<br/>                     • IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.                 </p> |

| SITE DETAILS  |      |           | SITE APPRAISAL <sup>19</sup> |              |             | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |             |  |  |
|---|------|-----------|------------------------------|--------------|-------------|-----------------------|-----------------|--------------|--------------|-------------------------|-------------|--|--|
| Site Ref. and Address   | Type | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK  | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME  |
| Burlington Way<br>Industrial Estate<br>(Part 1 –<br>Malden Way)<br>MERTON | LSIL | 0.7       | 34                           | 5            | 5           | 44                    | Less vulnerable | 12%          | 85%          | 3%                      | <b>HIGH</b> |   | <ul style="list-style-type: none"> <li>at 'high' flood risk (3% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL SITES;</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.</b></li> </ul>   |
| Garth Road<br>Industrial Estate<br>MERTON                                 | LSIL | 9.4       | 32                           | 15           | 15          | 62                    | Less vulnerable | 84%          | 15%          | 1%                      | <b>HIGH</b> |  | <ul style="list-style-type: none"> <li>this area is at 'high' risk of flooding (5% in FZ 3);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> |

| SITE DETAILS                                       |      |           | SITE APPRAISAL <sup>19</sup> |              |             |             | FLOOD RISK ASSESSMENT |              |              |              |             |   | SEQUENTIAL TEST OUTCOME   |
|--|------|-----------|------------------------------|--------------|-------------|-------------|-----------------------|--------------|--------------|--------------|-------------|---|---|
| Site Ref. and Address                              | Type | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE | Vulnerability         | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | FLOOD RISK  | Flood Zone Extents Affecting the Site   | SEQUENTIAL TEST OUTCOME   |
| Kimpton Strategic Industrial Location (SIL) SUTTON | SIL  | 5.9       | 34                           | 15           | 15          | 64          | Less vulnerable       | 90%          | 5%           | 4%           | <b>HIGH</b> |  <ul style="list-style-type: none"> <li>at 'high' flood risk (4% in FZ 3);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> | <ul style="list-style-type: none"> <li>at 'high' flood risk (4% in FZ 3);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS UNSUITABLE/ UNAVAILABLE FOR WASTE USES; AND</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT OR FORECAST C&amp;D ARISING.</b></li> </ul> |
| Oldfields Road Industrial Area SUTTON              | LSIL | 0.6       | 30                           | 5            | 5           | 40          | Less vulnerable       | 0%           | 90%          | 10%          | <b>HIGH</b> |  <ul style="list-style-type: none"> <li>at 'high' flood risk (10% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL SITES;</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.</b></li> </ul>  | <ul style="list-style-type: none"> <li>at 'high' flood risk (10% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE</b></p> <ul style="list-style-type: none"> <li><b>IT IS AT 'HIGH' FLOOD RISK;</b></li> <li><b>IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL SITES;</b></li> <li><b>IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.</b></li> </ul>   |

| SITE DETAILS                         |      |           | SITE APPRAISAL <sup>19</sup> |              |             | FLOOD RISK ASSESSMENT |                 |              |              | SEQUENTIAL TEST OUTCOME |             |  |   |
|--------------------------------------|------|-----------|------------------------------|--------------|-------------|-----------------------|-----------------|--------------|--------------|-------------------------|-------------|--|---|
| Site Ref. and Address                | Type | Area (ha) | Suitability                  | Availability | Via-ability | TOTAL SCORE           | Vulnerability   | Flood Zone 1 | Flood Zone 2 | Flood Zone 3            | FLOOD RISK  | Flood Zone Extents Affecting the Site  | SEQUENTIAL TEST OUTCOME   |
| Restmor Way Industrial Estate SUTTON | LSIL | 3.4       | 30                           | 5            | 5           | 40                    | Less vulnerable | 10%          | 85%          | 5%                      | <b>HIGH</b> |   | <ul style="list-style-type: none"> <li>at 'high' flood risk (3% in FZ 3);</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE IT IS AT 'HIGH' FLOOD RISK; IT IS INHERENTLY LESS 'AVAILABLE OR VIABLE' COMPARED TO ALREADY OPERATIONAL SITES; IT IS NOT NEEDED IN ORDER TO MEET THE 2036 APPORTIONMENT.</b></p>   |
| Wandle Valley Trading Estate SUTTON  | LSIL | 0.3       | 26                           | 5            | 5           | 36                    | Less vulnerable | 0%           | 60%          | 40%                     | <b>HIGH</b> |  | <ul style="list-style-type: none"> <li>area at 'high' flood risk (40% FZ 3);</li> <li>arising from site appraisal (Table 2.1), it is considered unsuitable/unavailable due to redevelopment /allocation for other uses;</li> <li>existing capacity for HCI in Sth London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa; and</li> <li>existing C&amp;D capacity (420,275) exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.</li> </ul> <p><b>THIS AREA HAS THEREFORE BEEN EXCLUDED FROM DRAFT SLWP SINCE IT IS AT 'HIGH' FLOOD RISK; MUCH OF THE ORIGINAL AREA HAS BEEN REDEVELOPED FOR OTHER USES AND REMAINING AREA FORMS INTEGRAL PART OF THE WANDLE VALLEY TRAIL; AND NOT NEEDED TO MEET THE 2036 APPORTIONMENT OR C&amp;D ARISING</b></p> |





## 5. Summary and Conclusions

### Sequential test summary

#### FLOOD ZONE 1 – LOW RISK

##### (1) SITES AT LOW RISK OF FLUVIAL FLOODING (FLOOD ZONE 1) AND INCLUDED IN THE DRAFT SLWP

5.1 Following the sequential test, the following sites are proposed for inclusion in the SLWP since:

- they are located wholly in Flood Zone 1 (low risk);
- they are currently in use for waste purposes which are classified as 'less vulnerable' to flood risk;
- the 'exceptions test' would not be required for any future planning applications for waste uses on these sites, including proposals for site intensification; and
- they score highly for suitability, availability and viability as shown in the site appraisal scores.

|   |  |
|---|--|
| Site C1: Able Waste Services (Croydon)              | Site M11: Morden Transfer Station (Merton)       |
| Site C4: Days Aggregates (Croydon)                  | Site M12: NJB Recycling (Merton)                 |
| Site C6: Fishers Farm (Croydon)                     | Site M13: One Waste Clearance (Merton)           |
| Site C7: Henry Woods (Croydon)                      | Site M14: Reston (Merton)                        |
| Site C8: New Era Metals (Croydon)                   | Site M18 Wandle Waste Management (Merton)*       |
| Site C9: Pear Tree Farm (Croydon)                   | Site S1: 777 Recycling Centre (Sutton)           |
| Site C11: Safety-Kleen (Croydon)*                   | Site S2: Beddington Farmlands ERF (Sutton)       |
| Site K2: Genuine Solutions (Kingston)               | Site S3: Cannon Hygiene (Sutton)*                |
| Site K3: Kingston R&R Centre (Kingston)             | Site S4: Croydon Transfer Station (Sutton)       |
| Site K4: Kingston Waste Transfer Station (Kingston) | Site S6: Hydro Cleansing (Sutton)                |
| Site M1: B&T@Work (Merton)                          | Site S7: Kimpton Park Way Civic Amenity (Sutton) |
| Site M4: Garth Road R&R Centre (Merton),            | Site S8: King Concrete (Sutton)                  |
| Site M5: Garth Road Transfer Station (Merton)*      | Site S9: Premier Skip Hire (Sutton)              |
| Site M7: LMD Waste Management (Abbey) (Merton),     | Site S10: Raven Recycling (Sutton)               |
| Site M9: Maguire Skips (Wandle Way) (Merton)        | Site S11: TGM Environmental (Sutton)             |
| Site M10: Powerday (Weir Court) (Merton)            | Site S12: Country Waste Skip Hire (Sutton)       |

##### (2) SITES AT LOW RISK OF FLUVIAL FLOODING (FLOOD ZONE 1) BUT EXCLUDED FROM DRAFT SLWP

5.2 Despite being located within Flood Zone 1, the following sites and broad industrial areas have been excluded from further consideration because:

- they are not needed in order to meet the 2036 apportionment or forecast C&S arisings over the plan period;
- based on the outcome of the site appraisal, they are either (i) unsuitable or unavailable for waste uses; and/or (ii) they are inherently less 'available' or 'viable' compared to currently operational sites (as reflected in the individual site scores);
- the Intend to Publish London Plan indicates that there is a need for the four boroughs to ensure that sufficient land is safeguarded for (non-waste) employment uses within industrial locations (particularly within LB Sutton).

|   |   |
|---|---|
| Site C2: Croydon Car Spares (Croydon)                 | Purley Way South SIL – Part 1 (Croydon) |
| Site C3: Curley Skip Hire (Croydon) <sup>32</sup>     | Purley Way South(SI) - Part 2 (Croydon) |
| Purley Way North SIL <sup>33</sup> - Part 1 (Croydon) | Imperial Way SIL (Sutton)               |
| Marlpit Lane (Ullswater) LSIL (Croydon)               | Canbury Park LSIL (Kingston)            |
| Thornton Road LSIL (Croydon)                          | Red Lion LSIL (Kingston)                |
| Union Road LSIL (Croydon)                             | St George's LSIL (Kingston)             |

<sup>32</sup> this site is currently closed and located directly adjacent to two dwellings

<sup>33</sup> this site is currently not contributing to the apportionment and is located adjacent to existing and proposed residential areas

|  |  |
|--|--|
| Selsdon Road LSIL (Croydon)                  | Silverglade Business Park LSIL (Kingston)    |
| Gloucester Road LSIL (East) (Croydon)        | Dundonald Road LSIL (Merton)                 |
| Gloucester Road LSIL (West) (Croydon)        | Gap Road LSIL (Merton)                       |
| Vulcan Way LSIL (Croydon)                    | Rainbow LSIL (Raynes Park) (Merton)          |
| Barwell Business Park SIL (Kingston)         | Croydon Road LSIL (Sutton)                   |
| Chessington Industrial Estate SIL (Kingston) | Gander Green Lane/ Abbots Road LSIL (Sutton) |
| Cambridge Road/ Hampden Rd LSIL (Kingston)   | Plumpton Way Trading Estate LSIL (Sutton)    |

## FLOOD ZONE 2 – MEDIUM RISK

### (3) SITES AT MEDIUM RISK OF FLOODING (FLOOD ZONE 2) AND INCLUDED IN THE DRAFT SLWP

5.3 Despite being located wholly or partly in Flood Zone 2 (medium risk), the following sites are proposed for inclusion in the SLWP since:

- they are currently in use for waste purposes which are classified as 'less vulnerable' to flood risk;
- they already have planning permission and have therefore been approved on the basis of a site specific Flood Risk Assessment (FRA);
- the 'exceptions test' would not be required for any future planning applications for waste uses on these sites, including proposals for site intensification; and
- they generally score well for suitability, availability and viability by comparison with alternative sites (mostly broad industrial locations) across the plan area as shown in the site appraisal scores.

|   |  |
|---|--|
| Site C5B: Factory Lane R&R Centre (Croydon) | Site M8: LMD Waste (Willow Lane) (Merton)  |
| Site C13: Solo Wood Recycling (Croydon)     | Site M15 Riverside AD Facility (Merton)    |
| Site M2: European Metal Recycling (Merton)  | Site M16: Riverside Bio-Treatment (Merton) |
| Site M3: Deadman Confidential (Merton)      | Site M17: UK and European (Ranns) (Merton) |
| Site M6: George Killoughery Ltd (Merton)    | Site S5: Hinton Skips (Sutton)             |

### (4) SITES AT MEDIUM RISK OF FLOODING (FLOOD ZONE 2) AND EXCLUDED FROM THE DRAFT SLWP

5.4 Following the Sequential Test, the following sites and broad industrial areas have been excluded from further consideration because:

- they are wholly or partly in Flood Zone 2 (medium risk);
- they are not needed to meet the 2036 apportionment or forecast C&S arisings over the plan period;
- based on the outcome of the site appraisal, they are either (i) unsuitable or unavailable for waste uses; and/or (ii) they are inherently less 'available' or 'viable' compared to currently operational sites (as reflected in the individual site scores);
- the Intend to Publish London Plan indicates that there is a need for the four boroughs to ensure that sufficient land is safeguarded for (non-waste) employment uses within industrial locations (particularly within LB Sutton).

|   |                                     |
|---|-------------------------------------|
| Purley Way North SIL - Part 2 (Croydon) | Streatham Road LSIL (Merton)        |
| Durnsford Road LSIL?? – (Merton)        | Nelson Trading Estate LSIL (Merton) |
| Beddington SIL (Sutton)                 | Hackbridge LSIL (Sutton)            |
| Prince George's Road LSIL (Merton)      |                                     |

## FLOOD ZONE 3 – HIGH RISK

### (5) SITES AT HIGH RISK OF FLOODING (FLOOD ZONE 2) BUT INCLUDED IN THE DRAFT SLWP

5.5 Despite being located wholly or partly in Flood Zone 3 (high risk), the following sites are proposed for inclusion in the SLWP since:

- they are currently in use for waste purposes which are classified as 'less vulnerable' to flood risk;
- they already have planning permission and have therefore been approved on the basis of a site specific Flood Risk Assessment (FRA);
- the 'exceptions test' would not be required for any future planning applications for waste uses on these sites, including proposals for site intensification; and
- they generally score well for suitability, availability and viability by comparison with alternative sites (mostly broad industrial locations) across the plan area as shown in the site appraisal scores.

|                                       |                                       |
|---------------------------------------|---------------------------------------|
| Site C5A: Factory Lane LSIL (Croydon) | Site C12: Stubbs Mead Depot (Croydon) |
| Site C10: Purley Oaks LSIL (Croydon)  |                                       |

### (6) SITES AT HIGH RISK OF FLOODING (FLOOD ZONE 3) AND EXCLUDED FROM THE DRAFT SLWP

5.6 Following the Sequential Test, the following sites and broad industrial areas have been excluded from further consideration because:

- they are wholly or partly in Flood Zone 3 (high risk);
- they are not needed to meet the 2036 apportionment or forecast C&S arisings over the plan period;
- based on the outcome of the site appraisal, they are either (i) unsuitable or unavailable for waste uses; and/or (ii) they are inherently less 'available' or 'viable' compared to currently operational sites (as reflected in the individual site scores);
- the Intend to Publish London Plan indicates that there is a need for the four boroughs to ensure that sufficient land is safeguarded for (non-waste) employment uses within industrial locations (particularly within LB Sutton).

|   |  |
|---|--|
| Purley Way North SIL – Part 3 (Croydon)           | London Road LSIL (Kingston)                      |
| Durnsford Road SIL (Merton)                       | Sth Wimbledon Bus Park (Morden Rd) LSIL (Merton) |
| Willow Lane SIL (Merton)                          | Plough Lane SIL (Merton)                         |
| Garth Road LSIL (Merton)                          | Burlington Way (Beverley Way) SIL (Merton)       |
| Kimpton SIL (Sutton)                              | Hallowfield Way SIL (Merton)                     |
| Wandle Valley Trading Estate LSIL (Sutton)        | Bushey Road LSIL (Merton)                        |
| Site K1: Chessington Equestrian Centre (Kingston) | Burlington Way LSIL – Part 1 Malden Way (Merton) |
| St John's Industrial Estate LSIL (Kingston)       | Oldfields Road LSIL (Sutton)                     |
| Fairfield / Kingsmill LSIL (Kingston)             | Restmor Way LSIL (Sutton)                        |

## Sequential test conclusions

5.7 The London boroughs of Croydon, Kingston, Merton and Sutton have undertaken a sequential test on all potential waste sites and broad industrial locations which have been considered for inclusion in the new South London Waste Plan (SLWP) 2021-36. Accordingly, this document demonstrates how flood risk has been taken into account as part of the wider process of site appraisal and how the four boroughs have sought to apply a 'sequential, risk-based' approach to the identification of waste sites in order to avoid flood risk to people and property and manage any residual risk, taking account of climate change.

**5.8** While the fundamental purpose of the sequential test is to avoid the development of sites that are inappropriate on flood risk grounds by ensuring that sites at little or no risk of flooding are developed in preference to sites at higher risk, there are several unique circumstances relating to the preparation of the new waste plan which have constrained the ability of the sequential test to generate and chose between alternative sites. Most importantly

**5.9** Most importantly, the evidence base underlying the preparation of the new plan, including the EA's waste data interrogator; the Technical Paper (Anthesis, 2019) and updated site throughputs in the Sutton Authority Monitoring Report (AMR) 2018-19, shows that existing capacity for the management of household and commercial & industrial (HCI) waste in South London (946,345 tpa) already exceeds the 2036 apportionment (929,750 tpa) by +16,595tpa in the Intend to Publish London Plan 2019; and existing C&D capacity (420,275) already exceeds forecast arisings in 2036 (414,380 tpa) by +5,895 tpa.

**5.10** Since it can be demonstrated that there is no need for additional waste sites or capacity to be identified over the plan period to 2036 over and above existing operational or permitted waste sites, it would be difficult to justify the designation of additional alternative waste sites in the form of broad industrial locations, which mostly consist of SILs and LSILs across the plan area. This is because:

- the site appraisal carried as part of the evidence base shows that many of the broad industrial locations (SILs and LSILs) within the plan area are unsuitable and/or unavailable for waste uses (see Table 3.2);
- the outcome of the site appraisal (see scores in Tables 4.1, 4.2 and 4.3) reflects that fact that broad industrial locations are inherently less 'available' and viable' for waste uses by comparison with existing waste sites which have planning permission and are already operational;
- a number of the broad industrial locations are affected by flood risk, with significant areas located within EA Flood Zones 2 or 3;
- the Intend to Publish London Plan 2019 shows that there is a need to provide sufficient land for (non-waste) employment uses within industrial locations. This is particularly important in LB Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest);
- for existing waste management operations which are located within areas of higher flood risk and where a planning permission has already been granted, the fact that a site specific Flood Risk Assessment (FRA) will already have been prepared and approved by the relevant local planning authority which demonstrates that the development is 'safe without increasing flood risk elsewhere'. While the 'Exception test' is not strictly required to be demonstrated for most waste uses (with the exception of hazardous waste or landfilling operations located in Flood Zone 3), an operational site which already has planning permission based upon an approved FRA is favoured over a site which has never previously accommodated a waste use.

## Next steps

**5.11** The Sequential Test (this document) together with the sustainability appraisal (SA) report, the Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) screening will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the SLWP at the Examination in Public (EiP) stage.





