

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

South London Waste Plan



Evidence Base Document Reg 18 - Statement of Consultation

March 2020









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1. Introduction and Legislation

- **1.1** This Statement of Consultation (SoC) details the actions of the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton (hereafter "The Councils") undertook for a consultation on an Issues and Preferred Options South London Waste Plan.
- **1.2** This Statement is often referred to as a Regulation 18 statement. In fact though, it is intended to meet the requirements of Regulation 22 of the Local Plan Regulations (SI2012/767), paragraph (1) sub-paragraphs (c) (i), (ii), (ii), (iv)

Regulation 22 (1) of the Local Plan Regulations

22.—(1) The documents prescribed for the purposes of section 20(3) of the Act are—

- (a) the sustainability appraisal report;
- (b) a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;
- (c) a statement setting out-
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make representations under regulation 18,
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) how any representations made pursuant to regulation 18 have been taken into account;

2. Consultation Methods

2.1 The elements of the consultation were as follows:

When?	The consultation ran from the 31 October 2019 to 22 December 2019. However, to remain in line with its Local Plan consultation which had been extended, Croydon extended the South London Waste Plan consultation to 20 January 2020. All boroughs accepted late representations.
Who?	 The following groups or persons were consulted: Specific consultation bodies, relevant authorities, general consultation bodies and residents' groups on the LB Croydon

	database plus businesses and residents who expressed a wish to be on the LB Croydon consultee database
	• Specific consultation bodies, relevant authorities, general consultation bodies and residents' groups on the RB Kingston database plus businesses and residents who expressed a wish to be on the RB Kingston consultee database
	• Specific consultation bodies, relevant authorities, general consultation bodies and residents' groups on the LB Merton database plus businesses and residents who expressed a wish to be on the LB Merton consultee database
	• Specific consultation bodies, relevant authorities, general consultation bodies and residents' groups on the LB Sutton database plus businesses and residents who expressed a wish to be on the LB Sutton consultee database
	 Owners of the waste sites proposed to be safeguarded
	 Residents on Beddington Lane, Sutton and the roads immediately off Beddington Lane
	 Members of the Beddington North Neighbourhood Forum
	 Members of the charity Sustainable Merton
	 Prescribed bodies for Duty-to-cooperate purposes
	 Members of the London Waste Planning Forum
	• Local Authorities who received or sent more than 2,500 tonnes of Household or Commercial & Industrial waste, 5,000 tonnes of Construction, Demolition & Excavation waste and 100 tonnes of Hazardous waste in any year between 2013 and 2017.
How?	The following consultation methods were employed:
	• Emails and letters to all on the four Councils' consultee database, owners of waste sites proposed to be safeguarded, prescribed Duty-to-cooperate purposes bodies, members of the London Waste Planning Forum and local Authorities who received or sent more than 2,500 tonnes of Household or Commercial & Industrial waste, 5,000 tonnes of Construction, Demolition & Excavation waste and 100 tonnes of Hazardous waste in any year between 2013 and 2017.
	 Hand-delivered letters to those living on Beddington Lane, Sutton and the roads immediately off Beddington Lane

- Webpages on each of the four Councils' websites
 Inclusion on the consultation portal of the Council's website, if the Council has a consultation portal
 Documents placed at the main offices and libraries of all four Councils
 Notices in Local newspapers
 Press releases, where required by the SCI
 Tweets and Facebook posts, where required by the SCI
 Bespoke meetings at the Beddington North Neighbourhood Forum and Sustainable Merton
- **2.2** Therefore, the scope of the consultation extended beyond the requirements of Regulation 18 which required the Councils to

Regulation 18 of the Local Plan Regulations
Preparation of a local plan
18.—(1) A local planning authority must— (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.
 (2) The bodies or persons referred to in paragraph (1) are— (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
(b) such of the general consultation bodies as the local planning authority consider appropriate; and
(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.
(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

2.3 In providing an Issues and Preferred Options document, the Councils went beyond what was required (inviting representations on what the plan should contain) because the Councils considered waste planning is a complex matter and context to the issues and options was required. Nevertheless. The representors were able to make general comments as the final question stated:

Is there any other aspect of waste planning that the plan ought to contain?

3. Statements of Community Involvement

- **3.1** In addition, the consultation needs to meet the requirements of each Council's Statement of Community Involvement approved or adopted on the date the consultation started (31st October 2019). The Councils' approved or adopted Statement of Community Involvement on that date is as follows:
 - LB Croydon Statement Of Community Involvement (2018)
 - RB Kingston Statement of Community Involvement (2007)
 - LB Merton Statement of Community Involvement (2006)
 - LB Sutton Statement of Community Involvement (2014)
- **3.2** However, as shown in the previous paragraph, both RB Kingston's and LB Merton's Statements of Community Involvement were more than five years' out-of-date and so could not be used, although both Councils had new, draft Statements of Community Involvement about to be adopted or approved. Consequently, for this consultation. RB Kingston and LB Merton's consultation requirements defaulted to the Regulation 18 tests. The following tables set out each Council's Statement of Community Involvement Requirements and whether they have been met.

London Borough of Croydon			
Method of Consultation	Required by SCI?	Done	Evidence Available
Contact consultees on database	Required	YES	Bodies and organisations on request
Local Plan webpage	Required	YES	See Appendix
Consultation webpage	Required	YES	A link was provided to the Sutton consultation portal
Documents in council offices and libraries	Required	YES	Delivered
Seeking hard-to-reach groups	Required	YES	Within the consultee database
Notice in local newspaper	Optional	NO	-
Advertisement in council communications	Optional	NO	-
General meetings	Optional	NO	-
Bespoke meetings	Optional	NO	-
Social media	Optional	YES	See Appendix

Royal Borough of Kingston – Default	ed to Regula	tion 18	requirements
Method of Consultation	Required	Done	Evidence Available
	by Regs?		
Notify specific consultation bodies	Optional in	YES	Through Consultee
that a South London Waste Plan is	scope		Database. Bodies
being prepared and invite			and organisations
representations on what the South			on request
London Waste Plan should contain			
Notify general consultation bodies	Optional in	YES	Through Consultee
that a South London Waste Plan is	scope		Database. Bodies
being prepared and invite			and organisations
representations on what the South			on request
London Waste Plan should contain			
Notify residents and business	Optional in	YES	Through Consultee
owners that a South London Waste	scope		Database. Bodies
Plan is being prepared and invite			and organisations
representations on what the South			on request
London Waste Plan should contain			
Consultation webpage	No	YES	See Appendix
Documents in council offices and	No	YES	Delivered
libraries			
Council committees	No	YES	Strategic Housing &
			Planning Committee
			8 October
			(see website)
Social media	No	YES	See Appendix

Merton – Defaullted to Regulation 18 requirements			
Method of Consultation	Required by Regs?	Done	Evidence Available
Notify specific consultation bodies that a South London Waste Plan is being prepared and invite representations on what the South London Waste Plan should contain	Optional in scope	YES	Through Consultee Database. Bodies and organisations on request
Notify general consultation bodies that a South London Waste Plan is being prepared and invite representations on what the South London Waste Plan should contain	Optional in scope	YES	Through Consultee Database. Bodies and organisations on request
Notify residents and business owners that a South London Waste Plan is being prepared and invite representations on what the South London Waste Plan should contain	Optional in scope	YES	Through Consultee Database. Bodies and organisations on request
Local Plan webpage	No	YES	See Appendix
Notice in newspaper	No	YES	See Appendix
Social Media	No	YES	See Appendix
Dedicated phone and email	No	YES	See website in Appendix

Council committee meeting	No	YES	Borough Plan Advisory Committee 13 September Cabinet 19 September (see website)
Bespoke Meeting	No	YES	Sustainable Merton/Abundance Wimbledon Notes Available

Sutton			
Method of Consultation	Required by SCI?	Done	Evidence Available
Contact consultees on database	Required	YES	Bodies and organisations on request
Local Plan webpage	Required	YES	See Appendix
Consultation webpage	Required	YES	See Appendix
Documents in council offices and libraries	Required	YES	Delivered
Notice in local newspaper	Required	YES	See Appendix
Press release	Required	NO	The press release now goes straight out as a Facebook post
Council committee meeting	Required	YES	Housing, Economy & Business Committee 8 October (see website)
Social media	Required	YES	See Appendix
General meetings	Optional	NO	-
Bespoke meetings	Optional	YES	BNNF Minutes available
Letters to residents on and around Beddington Lane	Special	YES	Delivered 1 November

4. Consultation Responses

- **4.1** A total of 1,155 formal responses were received from 57 respondents on the South London Waste Plan issues and Preferred Options Document and its Sustainability Appraisal document.
- **4.2** The following table provides a summary of the responses and the council comment (in bold). A full list of the representations and the full officer comments are set out in an accompanying document.

Observations	30 Representations	
 The Wandle Valley Forum considered the plan in the context of be identified for 6 sites in close proximity to the Wandle <i>Councils' Action: References added to safeguarding the W</i> National Grid highlighted existing procedures for dealing with or NG assets and easement strips <i>Councils' Action: References added in the sites section</i> The Mayor of London commented that the plan was not in confusites coming forward, and sought further information on the me There was also concerned about the implementation of the was <i>Councils' Action: Councils produced a Sites Appraisal doc</i> Transport for London commented that the proposed plan is larg measures relating to sustainable transport of waste (inc. rail an Healthy Streets, Vision Zero, delivery and servicing plans, tram <i>Councils' Action: References added to policies WP5 and W</i> Environment Agency suggested that the plan could include an <i>Councils' Comment: Exempt sites already included</i> Curley Skip Hire agreed with the carry forward of sites from the in waste production. <i>Councils' Comment: London Plan apportionment figures a</i> Merton Conservatives commented that they support a more arr landfill/ERF, and support the net self-sufficiency target for waste north of the borough, the improvement of current waste collection the area where it can be recycled in its borough of origin. <i>Councils' Comment: Waste collection is a matter for the Sc hazardous waste facilities</i>. 	their charter relating to consistency of planning, and asked that issues Vandle in sites section verhead lines, high pressure gas pipelines and land rights relating to ormity with the draft new London Plan re policies prohibiting new waste thodology for determining suitability of existing sites for intensification. ste hierarchy. Sument and Deliverability Report. gely compliant with strategic transport policies, and recommended d waterways), traffic management/highway improvements, impacts on infrastructure and Crossrail 2 proposals. VP9 assessment of the contributions of exempt sites 2011 plan and suggested that planning should provide for a reduction Iready include a 5% reduction for waste generation	
 suggested that monitoring indicators need to be added. Councils' Action: Monitoring policy and table added. Surrey County Council commented that the plan complements their own and they are generally supportive, with conditions. Councils' Comment: Noted 		
0	ew waste sites to come forward and agreed with the carry forward ge principle to accommodate new developments, in accordance with	

national and regional documents.

Councils' Action: Agent of Change policy added

- Historic England commented that the plan should identify heritage assets and include policies to conserve or enhance the historic environment, and recommended changes on safeguarding of archaeological artefacts and remains.
 Councils' Action: References added to the sites section
- The Heathdene Area Residents Group agreed with the vision, objectives and Sutton safeguarding policies and queried the volume of projected waste water increase, as well as what will happen to waste currently sent to Beddington Farmlands *Councils' Comment: The volume waste is based on London Plan figures. Beddington Farmlands landfill has now closed.*
- South London Nappies suggested promotion of reusable nappies to reduce landfill and hazardous waste Councils' Comment: Noted.
- Sutton Independent Residents/CIIr Tim Foster challenged the strategic long term thinking on waste movements and called for reduction in HGV waste movements in Beddington

Councils' Comment: Sutton council is undertaking a study of transport capacity on Beddington Lane.

- Various comments from local residents on the Energy Recovery Facility and HGV waste traffic, cost of waste to residents and calling for increased air monitoring in Hackbridge and Beddington Councils' Comment: Noted
- Essex County Council supported the increased potential for net self sufficiency allowed by planning over a larger area, allowing a more strategic and sustainable approach *Councils' Comment: Noted*

Key Issues

	1 Cross-Boundary Issues	1 representation
 The Mayor of London/GLA supported retention of existing sites, and suggested changes to demonstrate the aims of net self-sufficiency in London while allowing small amounts of waste across borders due to operational and environmental considerations. Councils' Action: Paragraph 3.25 amended 		

2 How Much Waste Must the SLWP Plan for?	1 representation
 Viridor agreed with approach to plan for higher London Plan apportionments, and inclusion of constrained sites Councils' Comment: Noted 	

3 Scarcity of Land	4 representations
 sites coming forward in industrial areas. Councils' Comment: Councils are using the London Industrial Environment Agency disagreed with statements on the circulate for tonnage per hectare Councils' Comment: The councils do not need to use a too Viridor commented that while modern waste management facily management and maintenance uses mean that site designation Councils' Comment: Noted 	r economy regarding throughput per unit area, and suggested estimates nnage per hectare estimate lities can be more efficient in terms of land use, need for capacity for

4 Waste Transfer Facilities	2 representations
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• Environment Agency asked for confirmation that railheads in Chessington are safeguarded by the policies in the plan. Councils' Comment: Days Aggregates only manages waste at the Purley Depot and not its Chessington Depot
Essex County Council disagreed with plans to remove safeguarding at Beddington Farmlands

Councils' Comment: Beddington Farmlands landfill has closed

5 Climate Change, the End of Landfill and the Circular Economy	1 representation
 Viridor noted that the changes at Beddington Farmlands will st maintenance of the restored landfill. Councils' Comment: Noted: 	ill require space for infrastructure associated with management and

/ision and Objectives	51 representations	
 9 organisations and 42 residents responded Draft Vicion - Yos 22 No 20 Dop't know 7 Objection 	vos Vos 21 No 21 Dop't know 7	
	aft Vision - Yes 22, No 20, Don't know 7. Objectives - Yes 21, No 21, Don't know 7. rley Skip Hire agreed with vision and objectives but suggested the need for policies to reduce waste, and unnecessary to	
safeguard unsuitable sites		
Councils' Action: Site C3 deleted		
	inty Council agreed with both vision and objectives but sought clarity on self-sufficiency aims	
Councils' Comment: Noted		
SUEZ agreed with aims and objectives with reservation	ations over clarity of wording on hazardous waste for net self-sufficiency and use	
the Benedict Wharf site.		
Councils' Action: Vision and Objectives amend	Councils' Action: Vision and Objectives amended	
 Viridor - agreed with vision and objectives 	Viridor - agreed with vision and objectives	
Councils' Comment: Noted.		
	gning Out Crime Officer, Metropolitan Police - agreed with vision and objectives and requested that officers be invited to view ar	
•	omment on security for new and additional waste infrastructure	
Councils' Action: Reference added to Policy Wi		
	objectives and commented that reusable nappies should be promoted and funde	
Councils' Comments: Noted	d commented on wording of errongements for elinical words	
 NHS England agreed with vision and objectives an Councils' Action: Councils have tried to contac 	d commented on wording of arrangements for clinical waste	
	agreed with vision and objectives and commented on volume of HGV waste traffi	
• Sutton independent Residents/Cill Tim Poster - dis	agreed with vision and objectives and commented on volume of the v waste train	
0	a transport capacity study of Beddington Lane	
 Councils' Action: Sutton council is undertaking a transport capacity study of Beddington Lane Essex County Council expressed support for the Vision and Objectives 		
Councils' Comment: Noted		
	1 don't know. For objectives 13 agreed, 19 disagreed, 1 don't know. Comments	
	on to the vision, and in Kingston the closure of the Cox Lane site	
	s a matter for the South London Waste Partnership	

/P1 -	Strategic Approach to Household and Commercial/Industrial Waste	48 representations
•	Agree 13, Disagree 19, Don't know 10	
•	The Mayor of London/GLA objected to references to submissions made at the London the draft plan and directed the Councils to update the apportionment figures. <i>Councils' Comment: Noted</i>	Plan Examination in Public being included in
•	Environment Agency - objected to policy of new waste sites as new waste transfer sites	s may be needed
	Councils' Comment: Disagree	
•	Curley Skip Hire - commented on safeguarding of unsuitable sites	
	Councils' Action: Site C3 deleted	
•	Surrey County Council - agreed with policy other than management of windfall sites	
	Councils' Comment: Noted	
•	SUEZ - suggested change to wording on new sites not being permitted unless for comp	
	Councils' Comment: Disagree. There is a lot of untapped capacity within the exis	
•	Viridor agreed with policy but queried wording on extensions or contingency space for	management
	Councils' Comment: Noted	
•	NHS England objected to policy and requested additional sites to deal with clinical was	
	Councils' Action: Councils have tried to contact NHS England but have had no re	
•	South London Nappies - disagreed with policy and requested promotion and funding of	reusable nappies
	Councils' Comment: Noted	
•	Northamptonshire County Council were concerned that a ban on new waste sites as pe	
-	Councils' Comment: The existing sites can meet the need and there is sufficient	
•	Essex County Council disagreed with policy of not permitting new waste sites unless cl	
-	Councils' Comment: The existing sites can meet the need and there is sufficient	
•	Residents responses - 13 supported the draft policy, 19 did not support. On safeguardi support.	ng existing sites 12 supported, 13 did hot
	Councils' Comment: Noted	

WP2 - Strategic Approach to Other Forms of Waste	44 responses
 Agree 14, Disagree 16, Don't know 12 Thames Water supported the policy and provided guidance references for water supported <i>Councils' Comment: Noted</i> 	ly, wastewater and water quality

 Environment Agency - objected to position on restriction of new sites <i>Councils' Comments: The existing sites can meet the need and there is sufficient untapped capacity within existing site</i> The Mayor of London/GLA - commented on use of the term apportionment and recommended wording changes <i>Councils' Action: Amendment made</i> Curley Skip Hire - queried safeguarding unsuitable sites <i>Councils' Action: Site C3 deleted</i> 	s
North London Waste Plan Boroughs - questions on clarity of policy wording on construction, demolition and excavation waste	
Councils' Action: Clarification on excavation waste provided	
• Surrey County Council supported WP2 but queried discounting of demand for CD&E sites and the absence of excavation waste	
Councils' Comment: The existing sites can meet the need and there is sufficient untapped capacity within existing sites	
 SUEZ suggested changes in line with their response to WP1 Councils' Action: Policy WP2 revised 	
 NHS England did not support policy for reasons of clinical waste provision as per their reply to WP1 	
Councils' Action: Councils have tried to contact NHS England but have had no response	
 South London Nappies did not support policy on grounds of reusable nappy provision as per WP1 	
Councils' Comment: Noted	
 Essex County Council commented and said they felt that the proposal to not permit new CD&E waste sites unless compensatory unsound, as was the approach to hazardous waste sites 	was
Councils' Comment: The existing sites can meet the need and there is sufficient untapped capacity within existing sites	
 Of resident responses, 12 supported the policy and 14 said they did not support (including Sutton Independent Residents). Common size and format of the questionnaire and sewage treatment Councils' Comment: Noted 	

WP3 - Safeguarding of Existing Waste Sites	43 responses
 Agree 13, Disagree 15, Don't know 14 Mayor of London/GLA questioned the approach to compensatory provision and the sel supported the introduction of circular economy principles <i>Councils' Comment: Disagree on compensatory provision. The councils are proc circular economy is dealt with in Policy 7</i> Curley Skip Hire agreed with safeguarding of sites but suggested less suitable ones sh <i>Councils' Action: Site C3 deleted</i> Surrey County Council suggested the AMR be referred to for the most up to date site lipsed in the selected of the selected	ducing a site appraisal document. The nould be considered on a case by case basis

Councils' Action: Policy WP3 amended

- Veoilia supported the intensification of safeguarded sites to increase throughput Councils' Comment: Noted
- SUEZ suggested amendments to the wording of part (c) to include limits on compensatory provision, and queried the robustness of the plan to deal with unexpected eventualities

Councils' Action: Contingencies policy (WP10) added

- Viridor supported the safeguarding of existing sites but queried the boundaries shown in the plan relating to the ERF. *Councils' Action: Boundaries have been revised*
- NHS England disagreed with the policy and called for additional facilities for clinical waste Councils' Action: Councils have tried to contact NHS England but have had no response
- Essex County Council supported the concept of safeguarding waste sites but suggested that the policy should be limited to a specific distance from the site rather than specific boundaries, and did not support clauses refusing compensatory provision for waste sites outside the SLWP area

Councils' Comment: Buffer zones around waste sites not feasible. Disagree.

• Residents comments on clarity of the plan, costs and capacity to deal with packaging etc until recycling levels and reduced packaging increase

Councils' Comment: Noted.

WP4 - Sites for Compensatory Provision	43 responses
 Agree 14, Disagree 19, don't know 9 Environment Agency called for safeguarding of transhipment hubs in the area, such as <i>Councils' Action: Purley railhead is safeguarded. Chessington railhead does not</i> Curley Skip Hire suggested that compensatory provision policies should be applied to <i>Councils' Action: Site C3 deleted</i> Surrey County Council expressed support for the policy <i>Councils' Comment: Noted</i> SUEZ suggested that the policy should apply to new waste sites, and that policy shoul impacts <i>Councils' Action: Cumulative impacts are stressed in the sites section</i> NHS England did not support as no inclusion of facilities for clinical waste <i>Councils' Action: Councils have tried to contact NHS England but have had no r</i> 	t manage or transfer waste decide on safeguarding of existing sites d be reworded to take account of cumulative

WP5 - Protecting and Enhancing Amenity	47 responses
 Agree 18, disagree 14, don't know 9 Environment Agency recommended introducing references to an Agent of Change priis standard alongside BREEAM to capture additional materials and design elements of r <i>Councils' Action: Agent of Change policy added. Policy Wp6 changed to include</i> Curley Skip Hire suggested that the policies for compensatory provision should be apprisites <i>Councils' Action: Site C3 deleted</i> Surrey County Council supported the policy and suggested waste development within cannot be met on land elsewhere <i>Councils' Comment: Noted</i> Veolia suggested introducing an Agent of Change policy added SUEZ and Viridor both sought increased flexibility on external loading/unloading on a <i>Councils' Action: Reference added to WP5</i> NHS England agreed in principle but reiterated the need to include additional clinical v <i>Councils' Action: Councils have tried to contact NHS England but have had no in Councils' Comment: Disagree. This has been the most successful element of the Residents comments on cost, impact on the Beddington area and the need for more a felt that the policy should be modified to reflect net gain in biodiversity and provide furt <i>Councils' Action: Biodiversity is already included. Protection of rivers has been for more a felt that the policy should be modified to reflect net gain in biodiversity and provide furt <i>Councils' Action: Biodiversity is already included. Protection of rivers has been</i></i></i> 	hew facilities CEEQUAL blied to decide whether to safeguard existing the Green Belt can only be justified if need case-by-case basis the red lines of the site safeguarding ded to the policy waste facilities response I buildings were too prescriptive e 2011 South London Waste Plan policies ir quality monitors in the Hackbridge Area. One ther protection of rivers
WP6 - Sustainable Design and Construction of Waste Facilities	41 responses

- Agree 19, disagree 12, don't know 8
- Environment Agency suggested use of CEEQUAL assessments in place of BREEAM Councils' Action: Policy amended so that CEEQUAL and BREEAM can be used
- Curley Skip Hire agreed with the policy where possible Councils' Action: Site C3 deleted
- Surrey County Council supported the policy

Councils' Action: Noted

- SUEZ questioned reference to 'Designing Waste Facilities' guidance documents and suggested it should be restricted to where appropriate, and queried requirements to use green roofs on waste facilities Councils' Comment: Disagree. The council expects new development to have high sustainable attributes
- Designing Out Crime Officer recommended inclusion of the safety and security section from BREEAM Councils' Action: Safety and security considerations added to Policy WP5
- NHS England agree in principle subject to additional clinical waste facilities Councils' Action: Councils have tried to contact NHS England but have had no response
- Residents comments on cost and protection of existing wildlife habitats, as well as fitting with sprinklers Councils' Comment: Noted

WP7 - The Benefits of Waste

43 responses

- Agree 17, disagree 14, don't know 11
- Environment Agency asked that thermal treatment technologies should be explained in more detail, and should also refer to energy from waste such as the ERF
 - Councils' Comment: Councils understand the Mayor's statement refers to all thermal treatments
- Curley Skip Hire agreed with the policy Councils' Action: Site C3 deleted
- Surrey County Council queried references to recycling within the policy and suggested that the wording should be more positive Councils' Comment: Noted
- SUEZ supported the policy and suggested moving it forward in the document to set the tone for positive impacts Councils' Comment: Noted
- South London Nappies did not support the policy and suggested waste does not offer a benefit in terms of disposable nappies *Councils' Comment: Noted*
- Resident comments included broad support for locating new facilities to support employment and queries over traffic impacts of site intensification

Councils' Comment: Noted

• Essex County Council felt that Clause b of the policy 'Waste development for additional Energy from Waste facilities will not be supported' was too prescriptive and inflexible

Councils' Comment: The Councils are following the London Environment Strategy

WP8 - Planning Obligations	40 responses
 Agree 17, disagree 15, don't know 9 Curley Skip Hire suggested that the criteria should be used in safeguarding considera <i>Councils' Comment: Site C3 deleted</i> Surrey County Council supported the policy <i>Councils' Comment: Noted</i> SUEZ questioned whether the policy is necessary given the role of the development r obligations and considered the policy wording too complex <i>Councils' Comment: Disagree</i> NHS England support the policy in principle, subject to additional facilities for clinical <i>Councils' Action: Councils have tried to contact NHS England but have had no Summer Councils' Comment: Noted</i> 	nanagement process in identifying planning waste response

Safeguarding of Individual Sites - Croydon

General Comments	6 responses

- Historic England recommended that references to archaeological priority areas should be amended to reflect the borough review *Councils' Action: References added*
- Residents comments on cost, traffic in Beddington, and the need to expand any site Councils' Action: Sutton council is undertaking a study of transport capacity on Beddington Lane

Site	Comments including no. of responses for and against safeguarding
C1 - Able Waste Services	 Agree 10, Disagree 5, Don't Know 10 Historic England suggest that Airport House be added as an issue to consider <i>Councils' Action: Reference added.</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
C2 - Croydon Car Spares	 Agree 9, Disagree 4, Don't Know 10 Sutton Independent Residents/Cllr Foster agreed should be safeguarded

	Councils' Action: Site closed. Within residential area. Not safeguarded
C3 - Curley Skip Hire	 Agree 10, Disagree 5, Don't Know 9 Curley Skip Hire objected to safeguarding of the site on size and surrounding residential use grounds <i>Councils' Action: Site deleted</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Within residential area. Not safeguarded</i>
C4 - Days Aggregate, Purley Depot	 Agree 11, Disagree 4, Don't Know 9 Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i> Days Aggregates stressed the importance of concrete and building material production at a time of significant construction proposals, as well as railway works, and supported the retention and increased flexibility for use of the site. Company also reported that the site manages 169,000tpa of C&D waste <i>Councils' Action: Safeguarded. Site guidance amended to allow for flexibility</i>
C5 - Factory Lane Waste Transfer Stn	 Agree 11, Disagree 5, Don't Know 8 Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should not be safeguarded <i>Councils' Action: Safeguarded</i>
C6 - Fishers Farm Civic Amenity Site	 Agree 9, Disagree 3, Don't Know 10 Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
C7 - Henry Woods Waste Mgmt	 Agree 8, Disagree 4, Don't Know 11 Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
C8 - New Era Metals	Agree 10, Disagree 5, Don't Know 10

	 Historic England suggest that Airport House be added as an issue to consider <i>Councils' Action: Reference added.</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
C9 - Pear Tree Farm	 Agree 8, Disagree 5, Don't Know 11 Surrey County Council comment that site is not suitable for intensification but have no objections to safeguarding as an existing site <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
C10 - Purley Oaks Civic Amenity Site	 Agree 8, Disagree 4, Don't Know 11 Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
C11 - SafetyKleen, Coulsdon	 Agree 6, Disagree 4, Don't Know 12 Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
C12 - Stubbs Mead Depot	 Agree 9, Disagree 4, Don't Know 10 Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i> Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Historic England commented that the site will need to be an archaeological consideration given its size. <i>Councils' Action: Reference added</i>

Safeguarding of Individual Sites - Kingston

General Comments	
 Resident question over costs Councils' Comment: Noted 	

Site	Comments including no. of responses for and against safeguarding
K1 - Chessington Equestrian Centre	 Agree 6, Disagree 7, Don't Know 14 PoppyMill Ltd objected and said that the site is not a permanent site and has no opportunity to intensify use <i>Councils' Action: Site K1 deleted</i> Elmbridge Borough Council commented and strongly objected to safeguarding of the site on status, proximity to Green Belt and transport access grounds <i>Councils' Action: Site K1 deleted</i> Claygate Parish Council objected to retention of the site on the same grounds as for Elmbridge Borough Council <i>Councils' Action: Site K1 deleted</i> Surrey County Council commented and said that it would resist any new proposals which would result in access from the Kingston Bypass, as well as on Green Belt grounds <i>Councils' Action: Site K1 deleted</i> Historic England commented that the site if safeguarded would need to be considered on archaeological grounds <i>Councils' Action: Site K1 deleted</i> Sutton Independent Residents/Cllr Foster agreed should not be safeguarded <i>Councils' Action: Site K1 deleted</i>
K2 - Genuine Solutions Group	 Agree 7, Disagree 2, Don't Know 14 Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
K3 - Kingston Civic Amenity Site	 Agree 10, Disagree 2, Don't Know 12 Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded

	 Veolia welcomed safeguarding of the site for future waste uses Councils' Action: Safeguarded
K4 - Kingston Waste Transfer Station	 Agree 10, Disagree 2, Don't Know 12 Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>

Safeguarding of Individual Sites - Merton

General Comments	
 Wimbledon Park Residents Association commented and called for analysis of the imincluding detailed studies of the Weir Road site and restrictions on throughput if excercises <i>Councils' Comment: Noted. Please see Policy WP5 and guidance within the si</i> Residents comments include cost and air quality/smell associated with the Willow Laschools and fly tipping. 	eding EU limits es section

schools and fly tipping Councils' Comment: Noted. Please see Policy WP5 and guidance within the sites section

Site	Comments including no. of responses for and against safeguarding
M1 - B&T@Work	 7 Agree, 5 Disagree, 9 Don't Know National Grid requested that overhead lines crossing the site be considered as part of safeguarding and future site development <i>Councils' Action: Reference added</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
M2 - European Metal Recycling	 9 Agree, 5 Disagree, 9 Don't know National Grid requested that overhead lines crossing the site be considered as part of safeguarding and future site development

	 Councils' Action: Reference added Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M3 - Deadman Confidential	 9 Agree, 5 Disagree, 9 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M4 - Garth Rd Civic Amenity Site	 13 Agree, 3 Disagree, 7 Don't know Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
M5 - Garth Road Transfer Station	 12 Agree, 3 Disagree, 9 Don't Know National Grid requested that overhead lines crossing the site be considered as part of safeguarding and future site development <i>Councils' Action: Reference added</i> Veolia welcomed safeguarding of the site for future waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded
M6 - George Killoughery	 7 Agree, 5 Disagree, 11 Don't know The Wandle Valley Forum recommends that the plan should explicitly support any development of the site respecting the character of the Wandle, its function and open space, as well as a new public route along the riverbank <i>Councils' Action: Reference added</i> Transport for London asked to be consulted on any sites in close proximity to the tram network, and for potential impact to be flagged as an issue to consider <i>Councils' Action: Reference added</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
M7 LMD Waste Management (Abbey	 8 Agree, 5 Disagree, 10 Don't know

Industrial Estate)	 Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M8 - LMD Waste Management (Willow Lane)	 10 Agree, 5 Disagree, 9 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M9 - Maguire Skips (Wandle Way)	 9 Agree, 5 Disagree, 9 Don't know Maguire Skips Request that the plan be updated to show Powerday Ltd as the new site operator at Weir Road, and that the Wandle Way site should continue to be safeguarded <i>Councils' Action: Reference changed. Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
M10 - Maguire Skips (Weir Court)	 9 Agree, 5 Disagree, 10 Don't know Maguire Skips Request that the plan be updated to show Powerday Ltd as the new site operator at Weir Road Councils' Action: Reference changed The Wandle Valley Forum recommends that the plan should explicitly support any development of the site respecting the character of the Wandle, its function and open space Councils' Action: Reference added Transport for London noted that the site is included on land previously identified for use in construction of Crossrail 2, and advised that any future redevelopment plans should be refused Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M11 - Morden Transfer Station	 9 Agree, 4 Disagree, 10 Don't know SUEZ agreed that the site should be safeguarded, and requested that consideration be given to permitting operations to be carried out without the need for fully enclosed buildings. <i>Councils' Action: Safeguarded. See Policy WP5</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>

M12 - NJB Recycling	 8 Agree, 5 Disagree, 10 Don't know Transport for London noted that the site is included on land previously identified for use in construction of Crossrail 2, and advised that any future redevelopment plans should be refused Councils' Comment: Disagree The Wandle Valley Forum recommends that the plan should explicitly support any development of the site respecting the character of the Wandle, its function and open space Councils' Action: Reference added Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M13 - One Waste Clearance	 7 Agree, 5 Disagree, 10 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M14 - Reston Waste Transfer & Recovery	 9 Agree, 5 Disagree, 10 Don't know Transport for London noted that the site is included on land previously identified for use in construction of Crossrail 2, and any future redevelopment plans should be refused <i>Councils' Comment: Disagree</i> The Wandle Valley Forum recommended that the plan should explicitly support any development of the site respecting the character of the Wandle, its function and open space <i>Councils' Action: Reference added</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
M15 - Riverside AD Facility	 8 Agree, 5 Disagree, 10 Don't know The Wandle Valley Forum recommended that the plan should explicitly support any development of the site respecting the character of the Wandle, its function and open space, as well as a new public route along the riverbank <i>Councils' Action: Reference added</i> Historic England requested that the Wandle Valley Conservation Area be referenced in the planning designation and list of issues to consider <i>Councils' Action: Reference to be added</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded

M16 - Riverside Bio Waste Treatment Centre	 9 Agree, 5 Disagree, 10 Don't know The Wandle Valley Forum recommended that the plan should explicitly support any development of the site respecting the character of the Wandle, its function and open space, as well as a new public route along the riverbank <i>Councils' Action: Reference added</i> Historic England requested that the Wandle Valley Conservation Area be referenced in the planning designation and list of issues to consider <i>Councils' Action: Reference to be added</i> Sutton Independent Residents/CIIr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
M17 - UK and European (Ranns) Construction	 7 Agree, 5 Disagree, 10 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
M18 - Wandle Waste Management	 7 Agree, 5 Disagree, 10 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>

Safeguarding of Individual Sites - Sutton

General Comments	
Comments by residents on waste operations in Beddington, particularly HGV traffic volumes along Kimpton (S7) as a local facility Comment by Sutton Independent Residents/Cllr Foster about overloading of concrete lorries Councils' Action: Sutton council is undertaking a transport capacity study on Beddington L	

Site	Comments including no. of responses for and against safeguarding
S1 - 777 Recycling Centre	 13 Agreed, 7 Disagreed, 9 Don't know National Grid asked that an underground electricity cable near the site be added as an issue to consider Councils' Action: Reference added

	 Transport for London commented on the intensification of sites and the need to consider the Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact <i>Councils' Action: Reference added</i> Sutton Independent Residents/Cllr Foster stated that site should not be safeguarded <i>Councils' Action: Safeguarded</i>
S2 - Beddington Farmlands ERF	 15 Agreed, 13 Disagreed, 6 Don't know National Grid asked that 2 overhead electricity cables crossing the site be added as an issue to consider <i>Councils' Action: Reference added</i> Transport for London commented on the intensification of sites and the need to consider the Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact. <i>Councils' Action: Reference added</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
S3 - Cannon Hygiene	 12 Agreed, 6 Disagreed, 11 Don't know Transport for London asked to be consulted on any sites in close proximity to the tram network, and for potential impact to be flagged as an issue to consider <i>Councils' Action: Reference added</i> Transport for London commented on the intensification of sites and the need to consider the Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact. <i>Councils' Action: Reference added</i> Sutton Independent Residents/CIIr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
S4 - Croydon Transfer Station	 14 Agreed, 3 Disagreed, 12 Don't know Transport for London commented on the intensification of sites and the need to consider the Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact. <i>Councils' Action: Reference added</i> Veolia welcomed safeguarding of the site for future waste uses

	 Councils' Action: Safeguarded Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
S5 - Hinton Skips	 8 Agreed, 5 Disagreed, 14 Don't know National Grid asked that 2 overhead electricity cables and an underground cable crossing the site be added as an issue to consider <i>Councils' Action: Reference added</i> Transport for London commented on the intensification of sites and the need to consider the Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact. <i>Councils' Action: Reference added</i> Hinton Skips considered that the site should be safeguarded for waste uses <i>Councils' Action: Safeguarded</i> Sutton Independent Residents/Cllr Foster agreed should be safeguarded
S6 - Hydro Cleansing	 8 Agreed, 5 Disagreed, 15 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
S7 - Kimpton Civic Amenity Site	 31 Agreed, 3 Disagreed, 3 Don't know National Grid asked that an overhead electricity cable crossing the site be added as an issue to consider Councils' Action: Reference added Veolia welcomed safeguarding of the site for future waste uses
S8 - King Concrete	 7 Agreed, 7 Disagreed, 14 Don't know National Grid asked that an overhead electricity cable crossing the site be added as an issue to consider <i>Councils' Action: Reference added</i> Transport for London commented on the intensification of sites and the need to consider the

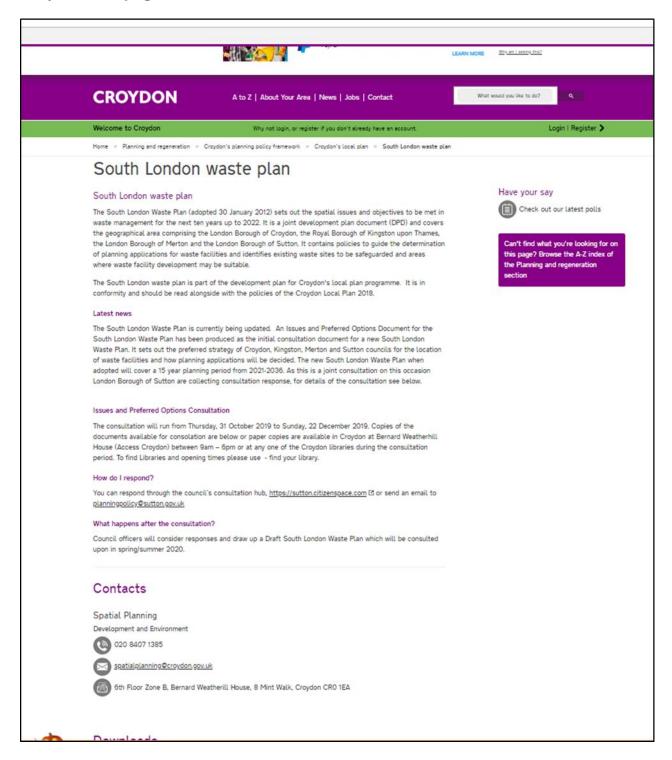
	 Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact. <i>Councils' Action: Reference added</i> King Concrete considered that the land should be safeguarded for waste uses along with land immediately to the south of the site, to allow for expansion proposals <i>Councils' Action: Safeguarded. Site boundary redrawn</i> Sutton Independent Residents/Cllr Foster stated that site should not be safeguarded <i>Councils' Action: Safeguarded</i>
S9 - Premier Skip Hire	 9 Agreed, 6 Disagreed, 12 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
S10 - Raven Recycling	 8 Agreed, 6 Disagreed, 14 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded Councils' Action: Safeguarded
S11 - TGM Environmental	 7 Agreed, 6 Disagreed, 14 Don't know Sutton Independent Residents/Cllr Foster agreed should be safeguarded <i>Councils' Action: Safeguarded</i>
S12 - Country Waste Skip Hire (Beddington Lane Resource Recovery Facility)	 8 Agreed, 8 Disagreed, 14 Don't know National Grid asked that 2 overhead electricity cables crossing the site be added as an issue to consider Councils' Action: Reference added Transport for London commented on the intensification of sites and the need to consider the Transport for London Road Network as part of any planning application, requesting that the Issues to Consider should include assessment of cumulative highways impact. Councils' Action: Reference added SUEZ commented supporting the strategy for safeguarding site S12 and no longer safeguarding Benedict Wharf Councils' Action: S12 safeguarded. Benedict's Wharf not safeguarded Sutton Independent Residents/CIIr Foster stated that site should not be safeguarded Councils' Action: Safeguarded

on the Strategic Road Network, so would not

Comments on the supporting Technical Report	
 Viridor suggested that the Beddington Recycling Centre should be considered for con- when the ERF is not operational, and for supporting uses in association with restored <i>Councils' Action: Reference added</i> 	

APPENDIX – EVIDENCE OF CONSULTATION

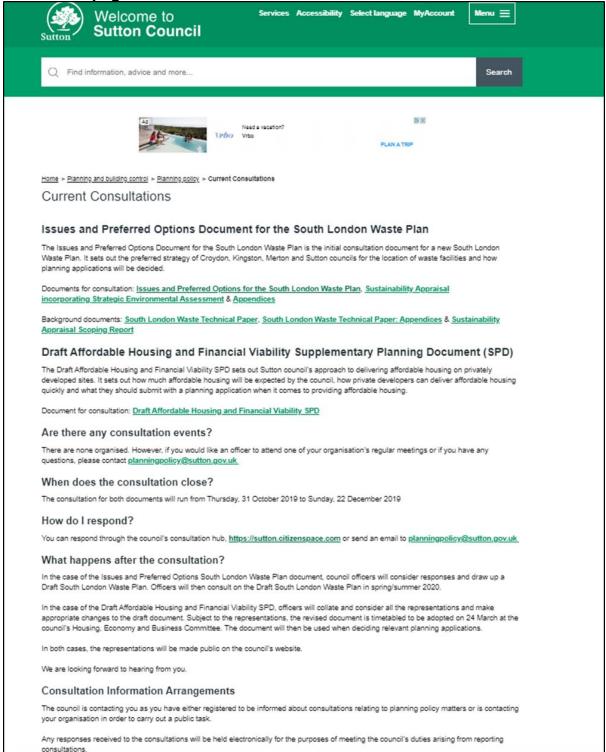
Croydon Webpage



Merton Webpage



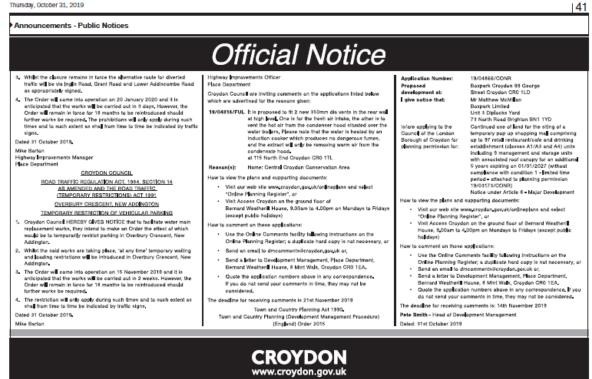
Sutton Webpage

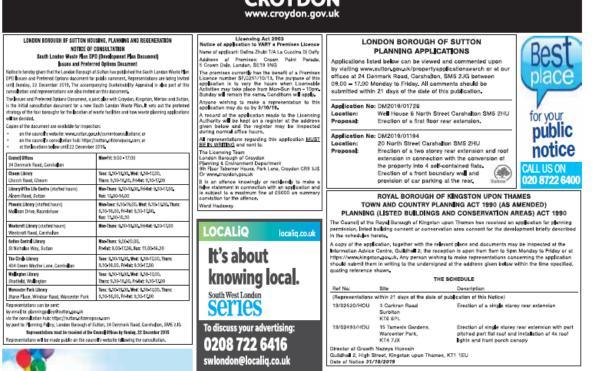


Merton Public Notice

Sutton Public Notice

Thursday, October 31, 2019





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Kingston Consultation Portal

South London Waste Plan Consultation

In 2012, the Royal Borough of Kingston, along with the three London boroughs of Croydon, Merton and Sutton adopted the South London Waste Plan (Development Plan Document) 2011-2021 which allocated sites, created planning policies and designated areas for waste management development.

The plan also safeguarded existing waste sites and identified areas which may be suitable for waste use. The plan period is coming to an end and so it is necessary to prepare a new one.

The four south London Councils of Croydon, Merton,

Kingston and Sutton have again agreed to prepare the South London Waste Plan. The new waste plan will cover the period 2021 to 2036 plan period.

No new waste sites are being proposed in this new Plan. The existing waste sites are being safeguarded and intensified where appropriate.

The Planning and Compulsory Purchase Act 2004 requires local planning authorities to engage and involve the local community and other interested parties in the area in the production of development plan documents, Including Waste Plans.

The consultation will take place between October and December 2019.



Patric	ck Akindude
Plannir	ng Policy Officer PA
Kingsto	on Council
Phone	02085476446
Email	planningpolicy@sutton.gov.uk

South London Waste Plan 21 (8.52 MB) (pdf)

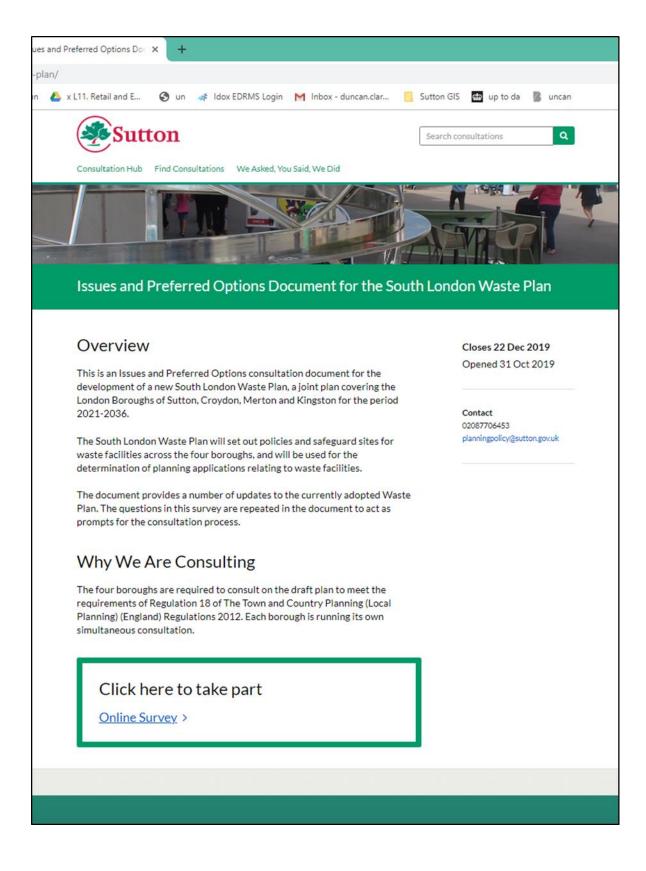
Appendices (13.9 MB) (pdf)

Technical Paper Appendices (2.64 MB) (pdf)

Technical Paper (1.18 MB) (pdf)

more.

Sutton Consultation Portal



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Last chance to have your say on the Issues and Preferred Options consultation for the South London waste plan which closes on Sunday (22). Find out more and how to get involved here: http://ow.ly/bUpl50xEYna #Croydon #CroydonLocalPlan

South London Waste Plan





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Your Croydon ② @yourcroydon · Dec 20, 2019 Last chance to have your say on the Issues and Preferred Options consultation for the South London waste plan which closes on Sunday (22). Find out more and how to get involved here: ow.ly/tGSN50xEYqd #Croydon #CroydonLocalPlan



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Merton Facebook

Merton Council 3 December 2019 - 🐼



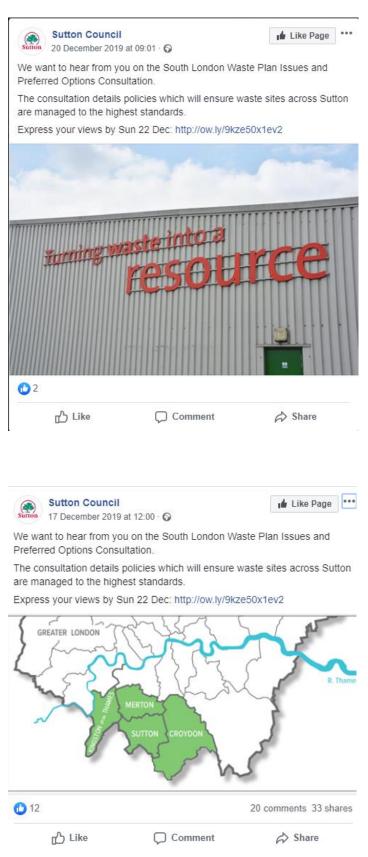
Get involved in the draft South London Waste Plan consultation until 22 December 2019. Sutton Council is running this consultation on behalf of the Merton, Kingston Croydon and Sutton councils https://www.sutton.gov.uk/currentconsultations



Merton Tweet



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The **South London Waste Plan** Issues and Preferred Options Consultation is now open.

We are proposing with neighbouring Councils that there should be no new **waste** sites.

Have your say: ow.ly/bYhI50x10Ro

Submit your views by Sunday 22 Dec.

