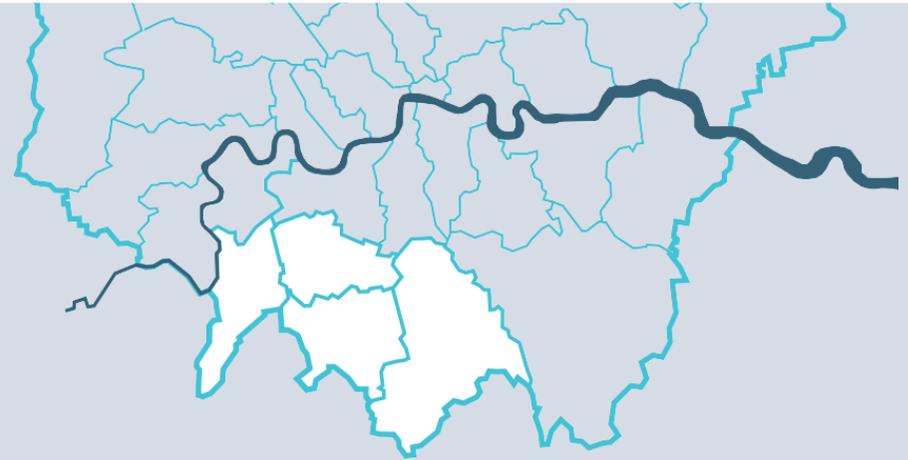


**L B Croydon**  
**R B Kingston**  
**L B Merton**  
**L B Sutton**



# South London Waste Plan

## Sustainability Appraisal Representations on the Scoping Report

March 2020

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**CONSULTATION ON SUSTAINABILITY APPRAISAL (SA) SCOPING REPORT ON THE SOUTH LONDON WASTE PLAN  
BETWEEN 16 SEPTEMBER AND 21 OCTOBER 2019**

**SCHEDULE OF REPRESENTATIONS AND OFFICER RESPONSES**

**LIST OF CONSULTEES**

No	Name
1	Environment Agency
2	Historic England
3	Natural England

**LIST OF REPRESENTATIONS**

Rep	Representor	Representation	Officer Response
1	<b>Environment Agency</b>	<p>Thank you for consulting the Environment Agency on the review of the South London Waste Plan and Sustainability Assessment Scoping Report. We welcome the review of the South London Waste Plan and see the key issues and opportunities relate to:</p> <ul style="list-style-type: none"> <li>Maximising opportunities to plan strategically for ongoing changes in the Waste management sector, tackling waste crime and delivering government objectives to move towards a circular economy in line with the Resources and waste strategy for England (December 2018) and Independent review into serious and organised crime in the waste sector (November 2018) and the emerging new</li> </ul>	<p><b>Noted – no action</b></p> <p>Each of the key issues and opportunities identified by the EA has been addressed in the SA Report on SLWP Issues and Options (October 2019), the SA Report on the Draft SLWP Proposed Submission (June 2020) and in the Statement of Cooperation (Parts 1 and 2) dated July 2020.</p> <p>The key strategies and guidance relating to delivering a circular economy and reducing crime in the waste sector are addressed in the following chapters of the SA Report on the SLWP Proposed Submission:</p>

Rep	Representor	Representation	Officer Response
		<p data-bbox="600 272 1361 437">London Plan. We have provided comments in Section 1 on the key strategies and guidance on Waste Management which should be assessed and used to inform the policies and proposed sites within the new South London Waste plan.</p> <ul data-bbox="555 676 1375 1331" style="list-style-type: none"> <li data-bbox="555 676 1375 906">• Continued partnership working to ensure waste management infrastructure is "fit for purpose" and resilient to a changing climate and supports the rising numbers of new households across, Croydon, Kingston, Merton and Sutton and a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process.</li> <li data-bbox="555 943 1375 1173">• Promoting partnership working with other agencies such as Health and Safety Executive (HSE) Public Health England and Planning Enforcement and Environmental Health teams, Metropolitan Police, London Fire Brigade, Driver &amp; Vehicle Standards Agency (DVSA) Her Majesty's Revenue and Customs (HMRC) and Border Force to prevent illegal or poor compliant waste management sites.</li> <li data-bbox="555 1235 1375 1331">• Using the latest evidence on flood risk and climate change to ensure exiting and new waste management facilities are located and designed to be resilient to extreme weather</li> </ul>	<ul data-bbox="1442 272 2056 644" style="list-style-type: none"> <li data-bbox="1442 272 2056 368">- Section 5 on 'Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)' –see Para 5.12;</li> <li data-bbox="1442 373 2056 539">- Section 7 on 'Key Sustainability Issues' - see Issue 3 'Sustainable Waste Management - Promoting the Circular Economy' and Issue 15 'Human Health and Quality of Life';</li> <li data-bbox="1442 544 2056 608">- Section 8 'SA Framework' – see appraisal questions under criteria 4 and 15'; and</li> <li data-bbox="1442 612 2056 644">- Section 12 'Appraisal of Policies and Sites'.</li> </ul> <p data-bbox="1397 676 2056 836">The four boroughs have produced a Statement of Cooperation in line with the statutory requirements which demonstrates how the principles of partnership working and 'joined-up' planning have been followed in the preparation of the SLWP.</p> <p data-bbox="1397 943 2056 1102">The four boroughs have produced a Statement of Cooperation in line with the statutory requirements which demonstrates how the principles of partnership working and 'joined-up' planning have been followed in the preparation of the SLWP.</p> <p data-bbox="1397 1235 2056 1362">The latest evidence on flood risk and climate change affecting the four boroughs has been used to inform the environmental baseline in Section 6 of the SA Report on the SLWP Proposed Submission.</p>

Rep	Representor	Representation	Officer Response
		<p>events. The latest environmental data sets are available to download from the Defra Data Services Platform.</p> <ul style="list-style-type: none"> <li>• Developing checklists and guidance as part of the new plan to ensure new and existing waste management sites follow the latest good practice to ensure full enclosure of waste activities in high quality buildings to reduce environmental impacts and are designed to the highest standards to reduce air pollution, noise, surface water pollution and high standards of fire prevention measures</li> <li>• Sharing information and evidence on the environmental performance and permit compliance across the Plan area.</li> </ul>	<p>Accordingly, Draft Policy WP6(b) states that waste facilities will be required to...</p> <p><i>“(ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6 , particularlywith regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity”</i></p> <p>The development of appropriate checklists and guidelines in order to ensure that new and existing waste sites follow the latest good practice is currently under discussion with the EA following a consultation meeting in January 2020.</p> <p>The EA has subsequently provided further information and evidence on the environmental performance and permit compliance across the Plan area (via letter from James Togher dated 8 August 2020)</p>
2	Historic England	<p>Thank you for consulting Historic England on the Sustainability Appraisal (SA) Scoping Report for the new South London Waste Plan (SLWP) 2021-36. We note that the SLWP covers the London boroughs of Croydon, Kingston, Merton and Sutton. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.</p>	<p><b>Agree – changes proposed</b></p> <p>The SA Framework has been amended as appropriate to ensure that the protection of the historic environment has fully taken into account at all stages of the preparation of the SLWP.</p>

Rep	Representor	Representation	Officer Response
		<p><b><u>Historic England Advice</u></b>            At this stage we do not consider that the SA Report adequately addresses the historic environment. The report provides a brief framework and much will depend how it is taken forward. It is important that the SA/SEA process brings some additional understanding and rigour to Waste Development Plan Documents and, with this in mind, you should consider expanding the historic environment baseline. While data on numbers of listed buildings and conversation areas are appropriate, it would be helpful to include commentary on other relevant matters that relate to waste developments e.g. the nature of the archaeological resource, the character of the district's historic settlements and their potential vulnerability. It is important also that cultural heritage and townscape are not artificially separated – the strong link between conservation areas and townscape should be clear.</p>	<p><b>Agree – Changes proposed</b>            The level of information on the historic environment in the Baseline chapter SA Report on the SLWP Proposed Submission (Section 6) has been increased. The link between conservation areas and townscape quality can be seen in Section 7 'Key Sustainability Issues' and Section 8 'SA Framework' which include both criteria together under Issue/ SA Objective (14) on 'Historic Environment, Townscape and Visual Amenity'.</p>
		<p><b><u>Section 3: Current Waste Arisings and Capacity in South London</u></b>  <i>Is the proposed appraisal methodology set out in Section 3 sound and consistent with meeting the requirements of both SA and SEA Directive?</i>            Page 11 states that a Technical Paper has been prepared and that this paper sets out potential sites/areas which could help meet the capacity gap, either through the intensification of existing operations or through the delivery of new sites. At this stage, this information has not been shared with us for comment. Any new proposals or site allocations need to carefully consider the impact on the surrounding historic environment, demonstrating the impact can be adequately mitigated</p>	<p><b>Noted – no action</b>            The Technical Paper prepared by Anthesis Consultants in June 2019 was subsequently made available on the respective websites of the four boroughs from 31 October 2019, the date upon which the SLWP Issues and Preferred Options document was published for public consultation.</p> <p>While no new waste sites have been proposed, either in the SLWP Issues and Preferred Options document (October 2019) or in the SLWP Proposed Submission (June 2020), the potential impact of Policies WI1-WP10 together with all existing waste sites being carried forward in the new plan on the</p>

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			surrounding historic environment have been in the SA Appraisal Matrix against criterion (14) of the SA Framework and the following key question: <i>“Will the policy or proposal avoid all potential adverse impacts on the quality and distinctiveness of south London’s historic environment and cultural assets?”</i>
		<p><u>Section 5: other Relevant Plans, programmes and Sustainability Objectives (Task A1)</u>  <i>Have any relevant plans, programmes and sustainability objectives been omitted from Section 4 and the scoping table presented in Appendix 2?</i>  We consider that Tasks A1-A5 set out in Section 4 of the SA Report are appropriate steps to take for this stage of the SA process.</p>	<b>Noted</b>
		<p>There are a number of other relevant plans and programmes that should be included in section 5, as follows:</p> <ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention</li> <li>• The European Convention on the Protection of Archaeological Heritage</li> <li>• Convention for the Protection of Architectural Heritage in Europe</li> <li>• Planning (Listed Buildings &amp; Conservation Areas) Act 1990</li> <li>• Ancient Monuments &amp; Archaeological Areas Act 1979</li> </ul> <p>The local level is also important in setting the appropriate contact for the scoping report, which could helpfully draw on</p>	<p><b>Agree – changes proposed</b>  all of the relevant plans and programmes recommended by Historic England have been incorporated in Section 5 ‘Baseline’ of the subsequent SA Reports on the ‘SLWP Issues and Preferred Options’ document and the Draft SLWP Proposed Submission.</p>

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		<p>existing Conservation Area Appraisals and Management Plans for each of the participating London Boroughs</p> <p>The Greater London Historic Environment Record (GLHER) should also be listed here given that it provides some of the most up-to-date information on the historic environment. The GLHER should also form part of the Plan's Baseline Evidence in section 6</p>	
		<p><u>Section 6: Baseline (Task A2)</u></p> <p><i>Does the baseline information in Section 6 provide a complete picture of the environmental, economic and social and equalities factors that need to be considered?</i></p> <p>The Scoping Report does set out data to the numbers of Conservation Areas, Scheduled Monuments and Registered parks and Gardens located within the Plan area (table 6.59, page 76). Only the number of Listed Buildings at Risk are listed, we recommend that the overall numbers are also referenced. Helpfully, this table also make reference to some non-designated heritage assets, such as Areas of Special Local Character and Locally Listed Buildings. However, in order to ensure that the potential exhibited by non-0statutory preceded archaeological sites is clearly represented at this high level, it would be helpful if the table included the number of Archaeological Priority Areas (APAs) within each borough and the total area per borough they represent. Reference could therefore be made to the draft London Plan and APA review to the Tier model which will mean that all areas of a borough are assigned to one of four levels of archaeological significance. APAs indicate areas that have archaeological potential, and may contain as of yet undiscovered remains of potentially national interest. Given this need for preservation in situ of archaeological evidence is not the preserve of Scheduled sites</p>	<p><b>Agree – change proposed</b></p> <p>Existing heritage assets in each of the four boroughs described in Section 5 'Baseline' of the subsequent SA Reports on the 'SLWP Issues and Preferred Options' document and the Draft SLWP Proposed Submission have been amended to take account of the additional information recommended by Historic England (where available) and now take account of key aspects such as the total number of listed buildings and the London Plan's 'Tier Model' of archaeological significance.</p> <p>As previously. the National Heritage at Risk Register has been used by the four boroughs in gathering baseline evidence.</p>

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		<p>and so early engagement will be key to inform future design options or site selection.            Identification and mapping of APAs and heritage assets at risk can provide an indication of clusters and themes that will help identify sites and key issues surrounding their development.</p> <p>The National Heritage at Risk Register should form part of the Baseline evidence. Other sources of evidence include:</p> <ul style="list-style-type: none"> <li>• National Heritage List for England</li> <li>• Heritage Gateway</li> <li>• GLHER Historic Environment Record</li> <li>• Heritage Impact Assessments looking into significance and setting</li> <li>• Visual impact assessments</li> <li>• Archaeological assessments</li> <li>• Topic papers</li> </ul>	
		<p><u>Section 7: Key Sustainability Issues (Task A3)</u>  <i>Do the key sustainability issues outlined in Section 7 reflect all the significant social, economic and environmental factors relevant to the South London area?</i></p> <p>It is regrettable that the historic environment is not recognised as a key sustainability issue in section 7. We note that heritage issues are amalgamated into <i>Issue 14 Townscape and Visual Amenity</i>, but this does not sufficiently cover all aspects of the historic environment. The conservation and enhancement of the historic environment is a key objective of sustainable development as set out in the NPPF, and as such we expect to see it recognised in the SA.</p>	<p><b>Disagree – no action</b></p> <p>As highlighted by Historic England elsewhere in their representation, Conservation Areas and other aspects of the historic environment are closely linked to townscape and local amenity objectives. This inter-relatedness is reflected in criterion (14) of the SA Framework, which has now been re-named as ‘Historic Environment, Townscape and Visual Amenity’.</p>

Rep	Representor	Representation	Officer Response
		<p>Section 8: Sustainability Appraisal Framework for the South London Waste Plan (Task A4)  <i>Does the SA Framework set out in Section 8 identify an appropriate range of sustainability objectives, indicators and targets for the purpose of appraising and monitoring the significant effects of the plan and alternative options?</i>            We raise concern to the lack of a stand-alone objective on the historic environment in the Sustainability Appraisal Framework.</p> <p>Objective 14: Townscape and Visual Amenity does try to incorporate historic environment issues but does not do this successfully. Notwithstanding our advice above, which is that a stand-alone objective on the historic environment is required, the Appraisal Questions to objective 14 are inappropriate. Potential adverse impacts should be avoided in the first instance whereas the appraisal question asks only for harm to be minimised suggesting that harm is built in as acceptable from the outset. No reference is made to the setting of heritage assets in the question or to Heritage at Risk.</p>	<p><b>Agree – changes proposed</b>            While a stand-alone objective relating to the historic environment has not been included for the reasons given above, the appraisal question listed under Issue (14) has been amended to read:  <i>“Will the policy or proposal <u>avoid all potential</u> adverse impacts on the quality and distinctiveness of south London’s historic environment and cultural assets”.</i></p>
		<p>The SA is the principal tool for monitoring the effects of the SLWP in operation. Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan’s implementation. The indicators set out in the table on page 96 are not helpful as they cannot be easily measured. Indicators that monitor the number of entries either added or removed to HAR registers as a result of waste developments, or monitoring the effects of waste sites on the setting of dsignated heritage assets etc. would be more appropriate. Guidance on indicators and monitoring in respect</p>	<p><b>Agree – changes proposed</b>            A monitoring framework has been introduced as part of the Draft SLWP Submission Version.</p>

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		<p>of the historic environment can be found in advice note listed in the conclusion of this letter.</p> <p>Issues such as light pollution, noise, vibration and other disturbance from waste sites can have an adverse effect on residential amenity and biodiversity but this applies equally to the historic environment. Such disturbance can cause direct physical damage to historic buildings and sites both above and below ground, and greatly compromise their settings. It is advised that the SA recognises the impact that these less tangible influences can have upon the historic environment.</p>	
		<p>We advise that an additional objective for the historic environment is added. We would suggest that the starting point for formulating Key Sustainability Issues for the Historic Environment should include:</p> <ul style="list-style-type: none"> <li>• Conserving and enhancing designated and non-designated heritage assets (including archaeology) and the contribution made by their settings</li> <li>• Heritage assets at risk from neglect, decay or development pressures</li> <li>• Areas where there is likely to be significant loss or erosion of landscape/townscape character or quality, or where development has had or is likely to have significant impact (direct or indirect) upon the historic environment and/or people's enjoyment of it</li> </ul> <p>Traffic congestion, air quality, noise pollution and other problems affecting the historic environment.</p>	<p><b>Disagree – no action</b> It is considered that the additional sustainability issues proposed by Historic England are already addressed elsewhere within in the SA Framework</p>
		<p>It would be helpful if the SA included an objective to monitor how land could be restored once waste operations have been concluded on sites.</p>	<p><b>Agree – changes proposed</b></p>

Rep	Representor	Representation	Officer Response
		<p>Appendix 1 – Glossary Finally, there should be an entry for ‘Historic Environment’ with an interpretation that references both above and below ground designed and non-designated assets.</p> <p>The historic environment is considered the most appropriate terms to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.</p> <p>Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled.</p>	<p><b>Agree – changes proposed</b></p>
		<p>Historic England has published guidance on Sustainability Appraisal that you may find helpful. This document contains details on baseline information, sustainability issues and objectives, indicators and monitoring: <i>Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</i></p> <p>Other documents you may find helpful are: <i>The Setting of Heritage Assets – Good Practice Advice in Planning 3</i></p> <p><i>The Historic Environment and Site Allocations in Local Plans – Advice Note 3</i></p> <p>All Historic England should be read alongside our <i>Conservation Principles</i>, which underpin our work.</p>	<p><b>Noted</b> Guidance contained within Historic England’s ‘Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment’ has been used in preparing the SA/SEA of the SLWP.</p>

Rep	Representor	Representation	Officer Response
		<p>In the preparation of the forthcoming SLWP, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service and local heritage groups.</p>	
		<p>Please note the absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a waste site, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not yet been asked to assess sites.</p> <p>Finally, we would like to stress that this information is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	<p><b>Noted – no action</b></p>
<p><b>3</b></p>	<p><b>Natural England</b></p>	<p>Thank you for your consultation on the above Strategic Planning Consultation, dated 16 September, 2019.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have <b>no comments</b> to make on this plan.</p>	<p><b>Noted – no action</b></p>

