

South London Waste Plan



Annual Monitoring Report 2011-2015

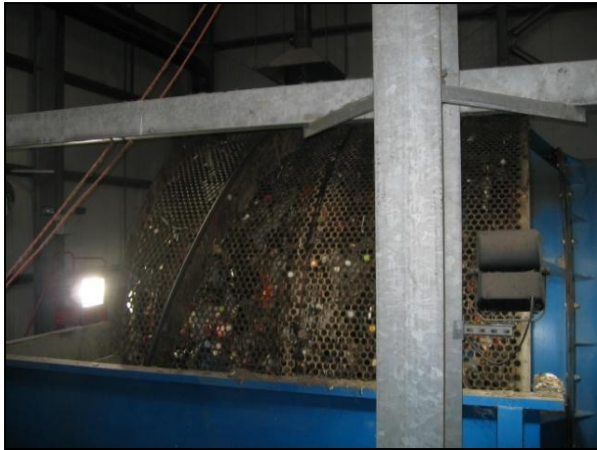


September 2015



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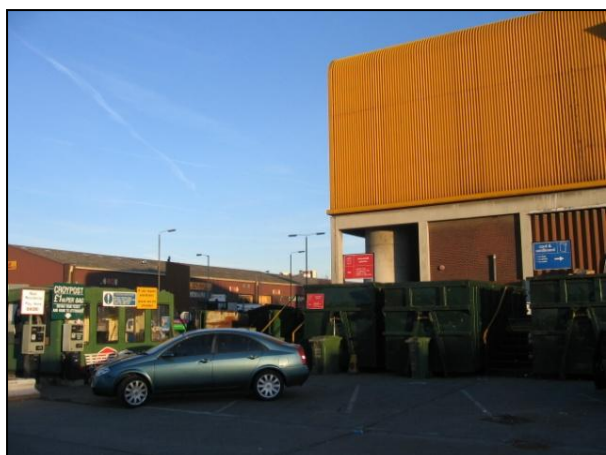
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1. Executive Summary

Plan Making

- The South London Waste Plan was adopted by all four councils on 5 March 2012.

Capacity, Arisings and Targets

- The South London Waste Plan area is currently managing 281,362 tonnes of Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) waste.
- The targets for the MSW and C&I waste streams are 732,000 tonnes in 2016 and 747,000 tonnes in 2021.
- There are currently four planning permissions which could provide 443,000 tonnes of capacity. Therefore, with these planning permissions implemented and future schemes, the targets for 2016 and 2021 could be met.
- There may be a need to divert approximately 784,000 tonnes of Construction, Demolition and Excavation (C, D and E) Waste from landfill for the plan to meet its London plan target of 95% of this waste stream reused or recycled. However, 2013 may be an exceptionally high year for C, D and E Waste being landfilled. There is currently approximately 190,000 tonnes of potential capacity within planning permissions for this particular waste stream.
- There have been no developments affecting the waste streams for Hazardous Waste, Agricultural Waste, Clinical Waste, Radioactive Waste and Waste Water.
- The Schedule of Existing Waste Sites to be Safeguarded (Schedule 1) has been amended to include 51 Imperial Way, Croydon, and to reflect operational and ownership changes on previously safeguarded existing waste sites.

Policy Analysis

- The recycling and composting rates for the South London Waste Plan area have to increase to meet the future London Plan targets. For MSW, 42% of the waste stream is currently recycled or composted, with the target being 50%. For C&I, 33% of this waste stream is currently estimated to be recycled or composted, with the target being 70%.
- C, D and E waste has missed the target for the amount reused or recycled of 95% in 2011 but this waste stream is highly volatile.
- The new planning permissions were mainly either on existing waste sites (Schedule 1) or in the areas identified as having sites which may be suitable for waste facilities (Schedule 2). There was one permission outside these areas (ie a windfall site) but it was between four Schedule 2 areas.
- Many new planning permissions did not meet the South London Waste Plan's sustainable design and construction requirements or carbon reduction targets.
- 11 of the new 14 permissions intend for waste to be treated in enclosed facilities.
- The new permissions were very successful at meeting targets relating to "traditional" planning concerns, such as the Green Belt/MOL, nature conservation, the historic and built environment, water, noise, traffic impact and environmental health. The exception to this was the Beddington ERF permission, which is on Metropolitan Open Land but may deliver benefits which outweigh the usual presumption against development on Metropolitan Open Land.

Management Actions

No management actions to deal with failing policies are planned. The boroughs have stated that they will only take action on the basis of a three-year rolling average, as this will mitigate for exceptional annual monitoring returns. The councils will monitor the implementation of planning permissions as these are the key to the South London Waste Plan achieving its objectives.



2. The Purpose of the Annual Monitoring Report (AMR)

- 2.1** The purpose of this Annual Monitoring Report is to assess the implementation of the South London Waste Plan Development Plan Document and to monitor the effectiveness of the policies in the South London Waste Plan.
- 2.2** The South London Waste Plan sets out the issues and objectives to be met in waste management for the next ten years. It is a joint DPD and covers the geographical area comprising the London Borough of Croydon, the Royal Borough of Kingston-upon-Thames, the London Borough of Merton and the London Borough of Sutton. The South London Waste Plan contains policies to guide the determination of planning applications for waste facilities, identifies existing waste sites to be safeguarded and areas where waste facility development may be suitable.
- 2.3** Paragraph 9 of the “National Planning Policy for Waste” (DCLG, October 2014) states that:
- “To inform the preparation of Local Plans and to inform the determination of planning applications as part of delivering sustainable waste management, local planning authorities should, to the extent appropriate to their responsibilities, monitor and report:
- Take-up in allocated sites;
 - Existing stock and changes in the stock of waste management facilities, and their capacity (including changes to capacity); waste arisings; and,
 - The amounts of waste recycled, recovered or going for disposal.
- 2.4** This annual monitoring report will therefore:
- Comment on the status on the South London Waste Plan and its context within each borough’s other planning policy documents (Chapter 3);

- Set the context of waste production and management in the South London Waste Plan area, using the latest available statistics (Chapter 4);
- Monitor recent developments in waste planning across the four boroughs and analyse whether the policies of the South London Waste Plan are effective and achieving the intended objectives (Chapter 5); and,
- Draw some tentative conclusions on the production and performance of the South London Waste Plan (Chapter 6).

2.5 As stated in the South London Waste Plan (Paragraph 4.9), the monitoring of the plan began on 7 December 2010 when Kingston's Full Council approved the Proposed Submission document.

2.6 Paragraph 4.9 also states that "due to the current volatility both in terms of the throughput of waste management facilities and the number of applications coming forward for waste facilities, the boroughs will only draw conclusions on policy performance on the basis of three-year rolling averages. The approach is designed to mitigate against exceptional monitoring returns in one year." Therefore, although this AMR will draw some preliminary conclusions, any necessary management actions will take place later in the plan period.



3. The South London Waste Plan and other Planning Documents

3.1 The South London Waste Plan was adopted by the Councils on the following dates:

London Borough of Croydon	30 January 2012
Royal Borough of Kingston-upon-Thames	24 January 2012
London Borough of Merton	1 February 2012
London Borough of Sutton	5 March 2012

3.2 In the case of each borough, the South London Waste Plan is part of a suite of planning policy documents that will be relevant to a planning application for a waste facility, termed the Development Plan. Throughout the South London Waste Plan, it is stated that proposals would need to meet or comply with the “other policies of the relevant borough’s Development Plan”.

3.3 Therefore, the purpose of this chapter is to provide an update on each of the partner borough’s Development Plan for interested parties.

3.4 As Figure 1.2 of the South London Waste Plan illustrates, the South London Waste Plan is in conformity with both the London Plan, produced by the Mayor of London, and the adopted or Local Plans of the four boroughs.

3.5 The other planning policy documents which will need to be considered, as of 1 August 2015, are as follows:

National Policy

- National Planning Policy for Waste (2014)
- The National Planning Policy Framework (2012)

Regional Policy

- The Further Alterations to the London Plan (2015)

Croydon Policy

- Croydon Local Plan: Strategic Policies (2013)
- Saved Policies of the Unitary Development Plan (plan adopted 2006, saved policies approved 2009)

Kingston Policy

- Core Strategy (2012)
- K+20: The Kingston Area Action Plan (2008)

Merton Policy

- Core Strategy (2011)
- Sites and Policies Plan (2014)

Sutton Policy

- Core Strategy (2009)
- Site Development Policies Development Plan Document (2012)

- 3.6** The Mayor of London also produces Supplementary Planning Guidance, which may be of relevance depending on the nature of the development and the location. Similarly, each borough produces Supplementary Planning Documents, which may be of relevance depending on the nature of the development and the location. Developers should also consult with the relevant borough with regard to Community Infrastructure Levy rates and planning obligations.



4. Targets, Arisings, Capacity and New Development in the South London Waste Plan Area

Sources Used

- 4.1** For the purposes of this chapter and the following one, statistics have been gathered primarily from the Waste Interrogator, which covers returns for the calendar year 2013 (the third year of South London Waste Plan monitoring). However, the planning permissions and planning applications referred to in the two chapters are the permissions and applications from 7 December 2010 to 31 July 2015.

Household Waste (HW) and Commercial and Industrial (C&I) Targets

- 4.2** The 2015 Further Alterations to the London Plan requires that the South London Waste Plan plans for the boroughs' combined apportionment for HW and C&I Waste, as calculated by the Mayor of London. However, Policy WP1 of the South London Waste Plan states that the boroughs will seek to attain net self-sufficiency, ie manage the equivalent of the boroughs' total waste arisings within the plan area, which is more than the combined apportionment.
- 4.3** The reasons for adopting this approach was (a) there was strong support in consultations for aiming to manage the equivalent of the arisings; (b) at 2021, the apportionment is relatively close to the arisings figure; and, (c) the Further Alterations to the London Plan requires boroughs to manage the equivalent of 100% of London's waste within London by 2026. Table 5.1 shows the waste projections for 2016 and 2021 in the Further Alterations to the London Plan.
- 4.4** Therefore, the targets for HW and C&I Waste for the South London Waste Plan are that the area manages:
- 732,000 tonnes in 2016
 - 747,000 tonnes in 2021.

Table 5.1: 2015 Further Alterations to the London Plan Waste Projections

	2016 (tonnes per annum)		2021 (tonnes per annum)	
	HW	C&I	HW	C&I
	Total		Total	
Croydon	137,000	136,000	143,000	135,000
	273,000		278,000	
Kingston	62,000	81,000	65,000	81,000
	143,000		146,000	
Merton	71,000	90,000	74,000	90,000
	161,000		164,000	
Sutton	78,000	77,000	82,000	77,000
	155,000		159,000	
South London Waste Plan Area	348,000	384,000	364,000	383,000
	732,000		747,000	
Greater London	3,115,000	4,654,000	3,226,000	4,637,000
	7,769,000		7,863,000	

HW and C&I Current Capacity

4.5 Table 5.2 shows the 2013 capacity for waste management across the South London Waste Plan area to be 281,061 tonnes. This figure is a decline since 2011 and the first three-year rolling average is 307,012 tonnes.

4.6 However, two caveats need to be stated when this table is referred to:

- The table includes only those sites with a waste management permit. It does not include any sites operating without waste permits, which could manage considerable types of certain waste, such as car breaking.
- The table does not include any waste managed at waste transfer stations. While the purpose of a waste transfer station is principally the bulking up and movement of waste, it is likely that some management takes place but this is not counted in the HW and C&I current capacity.

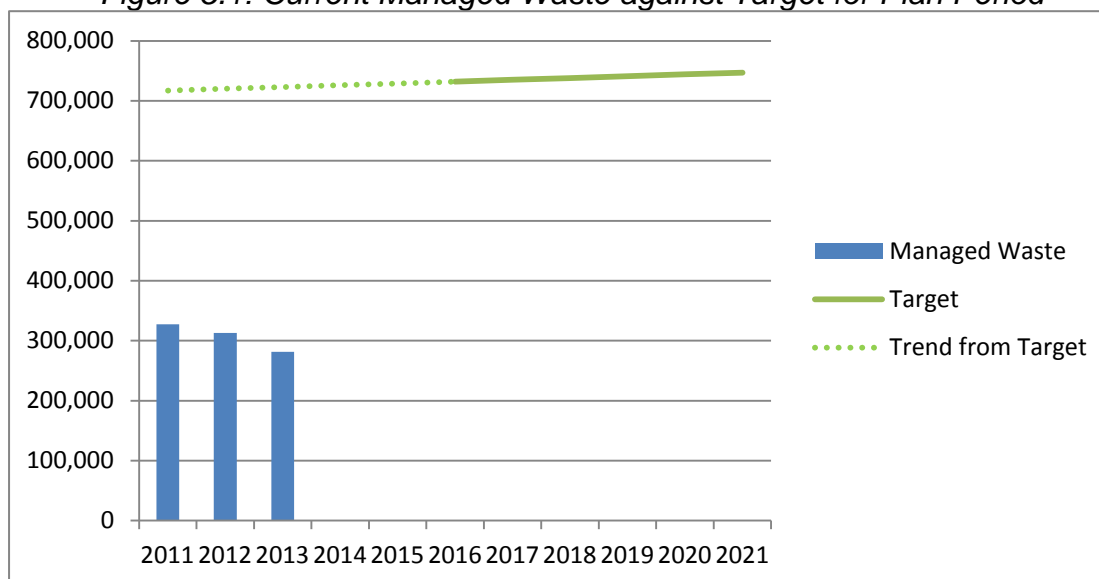
Table 5.2: Current HW and C&I Management Capacity

Borough	Operator	In Plan's Schedules	2011 Throughput (tpa)	2012 Throughput (tpa)	2013 Throughput (tpa)
Croydon	Croydon Car Spares	No. Too small	329	304	241
Croydon	New Era Metal Recycling	Yes. New to Schedule 1	x	x	2,240
Croydon	Henry Woods Waste	No. Relocated operator	x	1,785	x
Kingston	Genuine Solutions Group	Yes. Area 351-3, Schedule 1	x	52	1,630
Merton	B Nebbett & Son	Yes, Site 22, Schedule 1	87,270	79,950	70,100
Merton	Japanese 5 Star Autospares	Yes, Site 23, Schedule 1	19	45	48
Merton	Mitcham Eco	Yes, Site 126, Schedule 1	32,491	16,156	x
Merton	Vertal/Riverside Bio	Yes, Site V, Schedule 1	37,115	49,190	51,715
Merton	George Killoughery	Yes, Area 69, Schedule 2	x	0.1	9.3
Merton	Raven Waste Paper	No. New operator	x	x	565
Sutton	777 Recycling	Yes, Site 21, Schedule 1	47,950	24,134	26,209
Sutton	CiC (Viridor Composting)	Yes, Site 18, Schedule 1	78,483	100,966	98,612
Sutton	European Metal Recycling	Yes, Site 100, Schedule 1	43,462	40,274	29,993
HW and C&I MANAGED CAPACITY			327,119	312,856	281,362
<i>First three-year rolling average: 307,012 tonnes per annum</i>					
Sutton	Beddington Landfill	Yes. Site BF, Schedule 1	352,765	316,384	192,177
HW and C&I MANAGED AND LANDFILLED CAPACITY			679,884	629,240	473,539

HW and C&I Capacity Gap

- 4.7** Figure 5.1 shows the waste management capacity against the Further Alterations to the London Plan (FALP) target. The target in the FALP is for years 2016 and 2021 but the trend between 2016 and 2021 has been projected back in time to give a “target from trend”. As the figure shows, the 2013 capacity (281,362 tonnes) is considerably below the 2013 target from trend of 723,000 tonnes.

Figure 5.1: Current Managed Waste against Target for Plan Period



HW and C&I Unimplemented Permissions

- 4.8** Table 5.3 shows there are 14 live planning permissions for the treatment of HW and C&I waste. The total potential capacity of the permissions is 547,000 tonnes. However, as New Era Recycling, Vertal (now Riverside Bio), George Killoughery and 777 Demolition already appear as existing capacity, these sites are discounted to avoid double counting and so the total capacity available from planning permissions is better judged as 443,000 tonnes.

Table 5.3: Planning Permissions since December 2010 Producing Additional Capacity

Borough	Site	Site Area (ha)	In Plan's Schedules	Planning Permission Issued	Planning Permission Ref No	HW & C&I Capacity	C, D and E Capacity
Croydon	New Era Metal Recycling 51 Imperial Way <i>[implemented]</i>	0.4	Area 102 Schedule 2	7 Dec 2012	12/02077P	9,000 - metal recycling	
Croydon	Able Waste Services 43 Imperial Way <i>[not implemented as yet]</i>	0.5	Area 102 Schedule 2	16 April 2013	13/00455P		20,000 - recycling (20,000 transfer)
Merton	SITA Transfer Station Weir Road <i>[implemented]</i>	0.3	Site 27 Schedule 1	30 Jan 2014	08/P2235	20,000 - MRF	70,000 - recycling
Merton	SITA Recycling Benedict Wharf <i>[implemented now called Mitcham Eco]</i>	3.6	Site 126 Schedule 1	12 Oct 2011	08/P2724	80,000 - recycling 40,000 - AD (40,000 transfer)	
Merton	George Killoughery 41 Willow Lane <i>[implemented]</i>	0.8	Area 69 Schedule 2	16 June 2012	11/P3200	(15,000 transfer)	60,000 - recycling
Merton	B&T@Work Unit 5 Abbey Industrial Estate Willow Lane <i>[implemented]</i>	0.06	Area 69 Schedule 2	3 April 2013	12/P0232	500 - MRF	500 - recycling
Merton	Maguire Skips Ltd 36 Weir Road <i>[implemented]</i>	0.3	Site 26 Schedule 1	29 May 2013	13/P1050		49,000 - recycling
Merton	Riverside Bio Ltd 42 Willow Lane <i>[implemented]</i>		Site V Schedule 1	2 April 2015	13/P3797	75,000 – anaerobic digestion	
Sutton	777 Demolition 154a Beddington Lane <i>[implemented]</i>	1.0	Site 21 Schedule 1	3 June 2011	D2011/63923	20,000 - bio-ethanol	20,000 - bio-ethanol
Sutton	Viridor Beddington Farmlands Beddington Lane <i>[not implemented as yet]</i>	6.0 (circa)	Site 18 Schedule 1	24 April 2013	D2012/66220	302,500 - incineration	
Sutton	Raven Waste Paper Ltd Unit 8-9 Endeavour Way <i>[implemented]</i>	0.1	No	11 July 2013	D2013/67162	(75,000 transfer)	
Sutton	Rubbish Express 124 Beddington Lane <i>[implemented]</i>	0.5	Area 532- 5312 Schedule 2	6 March 2014	D2013/68624	(50,000 transfer)	
Sutton	HS Works Ltd 112 Beddington Lane <i>[implemented]</i>	1.0	Area 539 Schedule 2	19 Dec 2013	D2013/67833		50,000 recycling
Sutton	Deadman Confidential Ltd 156 Beddington Lane <i>[implemented]</i>	9.0	Site 97 Schedule 1	6 June 2013	D2013/67584	(35,000 transfer)	(40,000 transfer)
TOTAL						547,000	269,500
TOTAL MINUS NEW ERA, VERTICAL, KILLOUGHERY AND 777 (To avoid double counting from 2013 returns)						443,000	189,500

HW and C&I Planning Applications

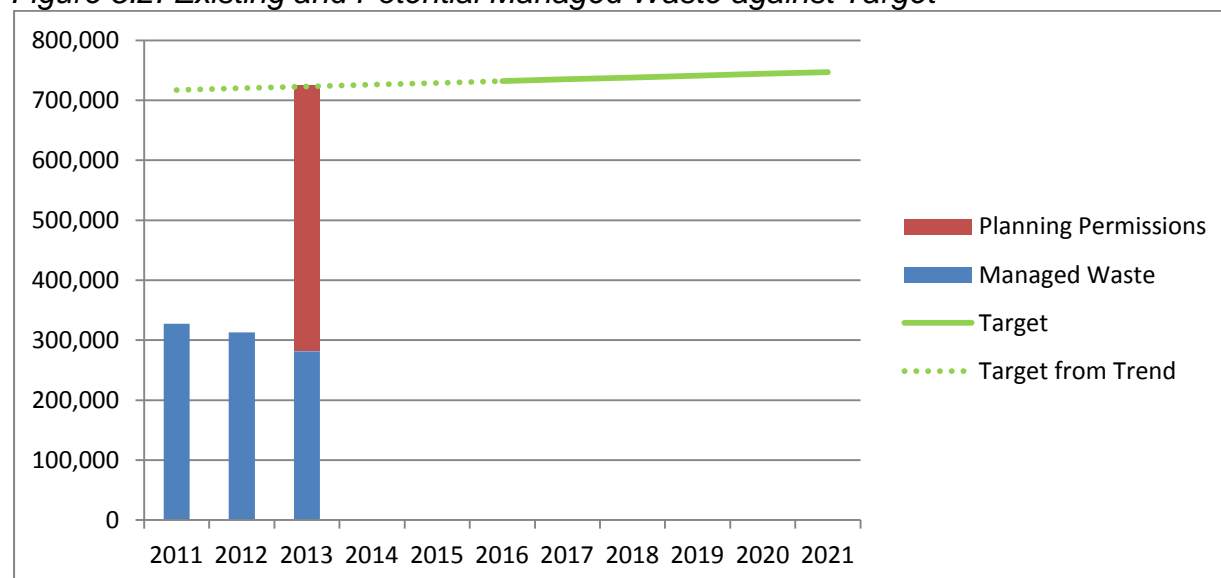
4.9 Table 5.4 shows the sole current planning application for waste facilities across the four boroughs.

Table 5.4: Current Planning Applications

Borough	Site	Site Area (ha)	In Plan's Schedules	Planning Application Ref No	HW & C&I Capacity	C, D and E Capacity
Sutton	Unit 12, Sandiford Road, Sutton		No	A2015/72203	1,200 - MRF	10,800
					1,200	10,800

4.10 Figure 5.2 shows in graphic form how the existing capacity with current planning permissions (avoiding double counting) compares to the target from the trends in the Further Alterations to the London Plan. In 2013, the target from trend is 723,000 tonnes but the existing managed capacity with all planning permissions implemented is 724,362 tonnes and so there is a surplus of waste management capacity of 1,362 tonnes.

Figure 5.2: Existing and Potential Managed Waste against Target



4.11 Table 5.5 provides a summary of the how HW and C&I arisings compare to the South London Waste Plan targets at 2016 and 2021 (otherwise known as the capacity gap).

Table 5.5: HW and C&I Capacity Gap

	2016 (tpa)	2021 (tpa)
Target (net arisings)	732,000	747,000
Current Capacity	281,362	281,362
Current Gap (with current capacity subtracted)	450,638	465,638
Planning Permissions	443,000	443,000
Capacity Gap (with current capacity and permissions subtracted)	7,638	22,638
Planning Applications	1,200	1,200
Capacity Gap (with current capacity, permissions and applications subtracted)	6,438	21,438

Construction, Demolition and Excavation (C, D &E) Waste

- 4.12** C, D & E waste management is difficult to assess since the arisings within the South London Plan area is difficult to quantify. The latest, rather tentative, attempt to quantify C, D and E waste arisings is produced in Table 3.2 of “Revised London Plan Waste Arisings Study Review for the Greater London Authority (SLR, January 2014).
- 4.13** The paper suggests that C, D and E arisings across the South London Waste Plan area could be:

Table 5.6: C, D and E Arisings in the South London Waste Plan Area

Borough	2016 (tpa)	2021 (tpa)
Croydon	329,000	343,000
Kingston	148,000	154,000
Merton	182,000	191,000
Sutton	174,000	183,000
TOTAL	833,000	871,000

- 4.14** The situation is further confused since the fate of the C, D & E waste is also often unknown. It is suspected that much of it is recycled on site, which is the preferred method of management in the South London Waste Plan (see Policy WP6 (e)), and some of it is likely to be spread on exempt sites.
- 4.15** Table 5.7 shows the sites identified by the 2013 Waste Interrogator as sites managing or landfilling inert waste, which serves as a proxy for C, D and E Waste.

Table 5.7: Managed and Landfilled C, D and E Waste in the Plan Area

Borough	Operator	2013 Throughput (tpa)
Croydon	Days Aggregates Purley Depot	139,001
Croydon	Henry Woods Waste Management, Mill Lane	12,885
Merton	George Killoughery Ltd, 41 Willow Lane	71,244
Merton	Reston Waste Management, Weir Road	55,474
Sutton	Raven Waste Paper, Endeavour Way	455
Sutton	777 Recycling, 158 Beddington Lane	30,470
Sutton	CiC (Viridor Composting), Beddington Farmlands	529
Sutton	European Metal Recycling Ltd, Therapia Lane	338
HW and C&I MANAGED CAPACITY		310,397
Sutton	Beddington Landfill	81,745
HW and C&I MANAGED AND LANDFILLED CAPACITY		392,142

- 4.16** The South London Waste Plan includes a target that less than 10% of C, D and E waste should be sent to landfill. Taking the arisings trend for C, D and E back in time produces a 2013 arisings estimate of 810,200. Therefore, since 81,745 tonnes were landfilled at Beddington Farmlands, it is estimated that more than 10 per cent of C,D and E waste is landfilled in Beddington Farmlands alone, before landfill sites in Surrey are considered.

Other Waste Streams

Hazardous Waste

- 4.17** Hazardous Waste is a sub-stream of the HW, C&I and C, D & E waste streams and is composed of substances such as waste electronic and electrical equipment, asbestos and contaminated soils. The 2013 Hazardous Waste Interrogator identified approximately 18,926 tonnes being produced in the plan area, with the disposal of oil being the biggest element.
- 4.18** In terms of fate, the 2013 Waste Interrogator identified only 964 tonnes of hazardous waste being managed in the South London Waste Plan area.
- 4.19** This stream is highly volatile and it is difficult to discern a trend.

Agricultural Waste

- 4.20** Agricultural waste is a sub-stream of C&I and C, D & E waste. There is no data at the borough level for this waste sub-stream. However, it is likely to occur in small quantities and so no additional need is anticipated beyond that which is provided as part of meeting the C&I arisings target.

Clinical Waste

- 4.21** The 2013 Hazardous Waste Interrogator identified 2,187 tonnes of health-related waste arising in the South London Waste Plan area. Two hospitals within the plan area hold waste transfer licences:
- Kingston Hospital and
 - St Anthony's Hospital in Sutton.
- Any application for future clinical waste facilities would need to prove that these two transfer stations were unable to cope with demand.

Radioactive Waste

- 4.22** Radioactive waste arises in minute volumes across the South London Waste Plan area so there is highly unlikely to be a need for a specialist facility to deal with this waste stream.

Waste Water

- 4.23** There are two sewage treatment works within the plan area: the Beddington works in Sutton and the Hogsmill works in Kingston. As the plan area's population increases, it could be argued there is a need for further capacity. However, as sewage treatment technology advances, there could also be a case for a decreasing landtake for these facilities. The boroughs of Kingston and Sutton are in frequent discussion with Thames Water about the sewage works' needs and requirements and Thames Water's plans.

Waste Transfer Facilities

- 4.24** Waste Transfer Facilities operate mainly for the movement of waste. However, in practice, most transfer facilities also have a waste management facility on site, such as a Materials Recycling Facility, to assist with sorting.
- 4.25** Unfortunately, due to the way in which the Waste Interrogator is configured, it is difficult to distinguish between waste that is merely transferred and that which is managed on these sites. Therefore, it is likely that some

management capacity at these sites is not accounted for in the calculations made for reaching the HW and C&I targets.

- 4.26** The waste transfer facilities which currently hold an Environment Agency permit for waste transfer within the South London Plan area and have waste recorded in the 2013 Waste Interrogator are listed in Table 5.8.

Table 5.8: Waste Transfer Stations operating in 2011

Borough	Site Name	Operator	SLWP Site Ref
Croydon	Purley Oaks Depot	E M Highway Services Ltd	n/a
Croydon	Purley Oaks (Civic Amenity)	Environmental Waste Controls	Site 4
Croydon	Fishers Farm HWRC (CA Site)	Environmental Waste Controls	Site 2
Croydon	Factory Lane Transfer Station	Environmental Waste Controls	Site 1
Croydon	64 Northwood Avenue, Thornton Heath (Non-Haz Waste Transfer)	Mr J Curley	n/a
Croydon	Peartree Farm, Addington (Hazardous Waste Transfer)	Mr S Smith	Site 5
Croydon	Safetykleen, Coulsdon (Hazardous Waste Transfer)	Safetykleen (UK) Ltd	Site A
Croydon	Stubbs Mead Depot (Non-Hazardous Waste Transfer)	Veolia ES Cleanaway (UK) Ltd	Site B
Kingston	Villiers Road (Civic Amenity)	RB Kingston Upon Thames	Site 6
Kingston	Kingston Waste TS, Villiers Road	Viridor Waste Man Limited	Site 6
Merton	Garth Road (Civic Amenity)	Environmental Waste Controls	Site 9
Merton	Garth Road HWRC Transfer Station	Environmental Waste Controls	Site 9
Merton	Maguire Skips (Inert Waste Transfer)	Maguire Skips	Site 26
Merton	Morden Transfer Station	Sita UK Ltd	Site 27
Merton	Mitcham Transfer Station	Sita Waste Handling Ltd	Site 126
Merton	32 Willow Lane (Inert Wst Trans)	New Era Recycling Ltd	Site 19
Sutton	Kimpton Park Way (Civic Amenity)	Environmental Waste Controls	Site 3
Sutton	Country Waste Recycling	One51 ES Recycling (Sth) Ltd	Site 17
Sutton	Croydon Transfer Station	Veolia ES Cleanaway Ltd	Site 98

Safeguarded Existing Sites

- 4.27** Policy WP3 requires that existing waste sites are safeguarded for the period of the plan. The policy states that “if, for any reason, an existing waste site is lost to a non-waste use, replacement compensatory provision will be required that, as a minimum, meets the maximum throughput that could have been achieved.” Therefore, the uses on the safeguarded sites will be closely monitored. In addition, paragraph 4.39 states: “The boroughs’ monitoring processes will provide an update to Schedule 1 which will incorporate new waste sites that are delivered during the lifetime of the plan.”
- 4.28** There have been a number of changes to Schedule 1 sites since the adoption of the South London Waste Plan and so there are some revisions to Schedule 1. The changes result from the following:
- Weir Road HWRC (Site 26) has closed and capacity has moved to Garth Road HWRC (Site 9). Site 26 has been taken over by Maguire Skips. This has resulted in a net no change for HW and C&I waste management but a 49,000 increase for C, D and E waste management.

- Site V has changed ownership and is now called Riverside Bio Ltd from Vertal
- Site 126 has been redeveloped and is now called Mitcham Eco from Benedict Wharf
- Site 97 (Sevenside Waste Paper) has been taken over by Deadman Confidential Ltd. This should result in an increase in transfer capacity.
- Site 25 (Sloane Demolition) has been taken over by the Sita Group. It is understood that Sita will file returns in the near future. This should result in an increase in HW and C&I waste management and a decrease in transfer capacity.
- 51 Imperial Way (New Era Metal Recycling) should be added to Schedule 1 as it is an implemented permission, on a site bigger than 0.2ha and contributes to meeting the HW and C&I targets.
- Site 17 (Country Waste Recycling) is being marketed on commercial websites

4.29 Table 5.10 sets out the revised Schedule 1 of the South London Waste Plan

Table 5.10: Revised Schedule 1 of the South London Waste Plan

Ref	Site Name	Borough
Metal Recycling Facilities		
22	B Nebbett & Son, Willis Road, Willow Lane Industrial Estate	Merton
23	Five Star Japanese Auto Spares, Unit 1-2 Weir Road	Merton
100	European Metal Recycling Ltd, Therapia Lane, Beddington	Sutton
NE	New Era Metal Recycling, 51 Imperial Way	Croydon
Household Waste And Recycling Sites		
2	Fishers Farm HWRC, North Down Road, New Addington	Croydon
3	Kimpton Road HWRC, Kimpton Park Way, Sutton	Sutton
4	Purley Oaks HWRC, Brighton Road, West Croydon	Croydon
Sites Hosting Household Waste and Recycling Sites and Borough Transfer Stations		
1	Factory Lane Transfer Station, Factory Lane, Croydon	Croydon
6	Villiers Road HWRC, Chapel Mill Road, Kingston	Kingston
9	Garth Road HWRC, Garth Road, Morden	Merton
Physical Treatment Facilities		
18	Viridor Recycling and Composting Centre (CIC), Beddington Lane, Beddington	Sutton
21	777 Recycling Centre, Coomber Way, Beddington	Sutton
101	Rentokil Initial Services Ltd, 46 Weir Road	Merton
A	Safetykleen Ltd, Unit B6, Redlands, Coulsdon	Croydon
V	Riverside Bio Ltd, Willow Lane, Mitcham	Merton
Waste Transfer Stations		
5	Pear Tree Farm Transfer Station, Featherbed Lane, Addington	Croydon
17	Country Waste Recycling Ltd, Beddington Lane, Beddington	Sutton
19	SE Skips/Waste World Ltd, Willow Lane	Merton
25	Sita, Amenity Way Morden	Merton
26	Maguire Skips, Weir Road, Wimbledon	Merton
27	SITA Transfer Station, Weir Road, Wimbledon	Merton
97	Deadman Confidential Ltd, Beddington Lane, Beddington	Sutton
98	Croydon Transfer Station, Endeavour Way, Beddington	Sutton
126	Mitcham Eco, Hallowfield Way, Mitcham	Merton
B	Stubbs Mead Depot, Factory Lane, Croydon	Croydon
Other Waste Facilities		
BF	Thames Water Services Ltd, Beddington Farmlands Landfill, Beddington Lane, Beddington	Sutton

Areas Which May Have Sites Suitable for Waste Facilities

- 4.30** The areas which may have sites suitable for waste facilities are listed in Schedule 2 of the South London Waste Plan, which is related to Policy WP4. It is anticipated that the majority of new waste facility development will come from within these areas and windfall sites will occur only in exceptional circumstances.
- 4.31** Table 5.3 shows that there are seven planning permissions on Schedule 1 sites, six planning permissions on sites within Schedule 2 areas and one planning permission on a windfall site. Table 5.4 shows there is one planning application on a windfall site.
- 4.32** Therefore, the sequential approach adopted by the South London Waste Plan of Schedule 1 sites and sites within Schedule 2 areas before any windfall sites seems to be operating effectively.



5. Monitoring and Policy Analysis

Introduction

- 5.1** The tables that comprise this chapter of the AMR analyse each of the indicators within the South London Waste Plan's monitoring framework. The source data are Table 5.2: Current MSW and C&I Management Capacity and Table 5.3: Current Planning Permissions since December 2010.

Policies WP1 to WP4

- 5.2** Indicators for Policies WP1 to WP4 show that targets have been difficult to achieve. This is perhaps not altogether surprising since this is only the third year of the plan and, if targets were achieved early in the plan period, then the plan would, to all intents and purposes, be redundant.
- 5.3** The overall arisings target has been missed. However, the planning permissions throughput total suggests that the shortfall could be made up over the plan period so that the target could be achieved in later years. Similarly, the returns for recycling and composting show that the targets (MSW - 50%, C&I – 70%) could be met later in the plan period.
- 5.4** In terms of Policy WP2, the C, D & E waste target has not been achieved as an increasing amount of landfilling is taking place at Beddington Farmlands. It is likely whether this is a temporary measure and some of the increase may be due to the capping of landfilled areas which have reached capacity. This is an extremely volatile waste stream and so further years' data will be needed before firm conclusions can be drawn. The indicators also show that the indicators for WP3 and WP4 were met as both the Schedule 1 sites and the Schedule 2 areas showed increases in sites, area and capacity.

Policy WP5

- 5.5 There was one planning permission on a windfall site. However, the windfall site is in a Strategic Industrial Location and near other Schedule 2 areas so it is a fairly appropriate location for a windfall site.

Policy WP6

- 5.6 The performance against the indicators for Policy WP6 has been patchy. The target of achieving a BREEAM bespoke excellent standard has been missed except in the case of three large developments as has the carbon emission minimisation target.

Policy WP7

- 5.7 The performance against Policy WP7, which includes more traditional planning considerations, has been more successful. 11 of the 14 permissions are for waste activities in a fully, enclosed covered building. The impact of the permissions on the Green Belt/Metropolitan Open Land, nature conservation areas, historic and sensitive receptors, water, noise, traffic, odour, vermin, litter and birds have all been limited fairly successfully. The exception is the case of the Energy Recovery Facility on Beddington Farmlands which may bring other benefits to compensate for the loss of Metropolitan Open Land.

Policy WP8

- 5.8 Only one permission was relevant for Policy WP8. The success of this permission in meeting Policy WP8 depends on whether the Beddington Energy Recovery Facility is connected to a district heat and power network.

Management Actions

- 5.9 Paragraph 4.9 of the South London Waste Plan states that actions to address areas where targets are not being met will only take place following an analysis of three year rolling averages of performance. The councils will monitor the implementation of planning permissions as these are the key to the plan achieving its objectives.

POLICY WP1, Indicator 1	
Indicator: Number, site area (ha) and annual capacity of existing and new licensed waste facilities for HW and C&I waste	
SLWP Objectives: Bullets 2, 3 and 6	SA Indicator: 1.1: To maximise net self sufficiency in the management of all waste arisings within South London
Monitoring: <u>Existing</u> Total Existing Sites: 25 (+1 from Waste Plan baseline) Total Site Area: 29.55 (+0.37 from Waste Plan baseline) 2013 Capacity: 281,061 tonnes (-95,126 tonnes from South London Waste Plan baseline) 2011-2013 Average: 307,012 tonnes (-69,175 tonnes from the South London Waste Plan baseline) <u>New Unimplemented Planning Permissions</u> Total New Sites: 1 Total Site Area: 6ha (circa) Potential Annual Capacity: 302,500 tonnes POTENTIAL TO MEET 2016 AND 2021 TARGETS IF PERMITTED DEVELOPMENTS ARE IMPLEMENTED AND IMPLEMENTED PERMISSIONS START HANDLING THROUGHPUT	Target and Source: By 2016 • To manage 732,000 tonnes of HW and C&I waste within the South London Waste Plan area By 2021 • To manage 747,000 tonnes of HW and C&I waste within the South London Waste Plan area
Delivery Partners: GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry	
Monitoring against Delivery: Monitor annually against target. Partner borough monitoring spreadsheet fed by the data from the partner borough application protocol. Assess target annually, act on rolling three year phase, considering unmet target and relevant waste management capacity in the planning pipeline	
Contingencies: If target not being delivered and not enough capacity in planning pipeline, explore reasons for failure: contact waste management industry especially south London operators to explore reasons for lack of deliverability; also other outer London waste plan areas (to facilitate comparison)	

Management Actions:

Identify reasons for failing target and address as follows:

- *Schedule 1 sites not coming forward*

- Contact landowners/ developers of Schedule 1 sites to ensure sites are coming forward (this feeds into the trajectory updates). If stalled, identify reason for stalling and borough(s) to act as a facilitator for development

- *Planning applications for facilities in Schedule 2 areas*

- Hold periodic meetings with waste operators to ensure we have their views of needs and site

- *Vacancy rates high in SILs and LSILs but planning applications not coming forward*

- Monitor vacancy rates in SILs and LSILs (already monitored by boroughs) and send information to waste operators

- *Sites not available*

- Meet major landowners to assess potential
- Identify scope for borough(s) to act as a facilitator for land assembly
- Assess the market churn to identify any level of churn and, if high, why waste operators are shut out
- Discuss public sector land availability with borough(s') estate departments

- *Sites available but planning applications not coming forward*

- Establish a "waste plan forum" to bring together landowners and developers to discuss needs and way forward
- Identify whether this is a South London problem or a wider problem by raising issue through London RTAB and share delivery experience through the London RTAB
- Consult and co-ordinate with the GLA. Also work jointly with the GLA on facilitating delivery
- Involve the London Waste and Recycling Board as a possible funding partner

- *Planning applications being refused*

- Consider producing an SPD or revising the DPD

POLICY WP1, Indicator 2	
Indicator: Proportion of HW and C&I arisings that are recycled. Proportion of HW and C&I arisings that are composted	
SLWP Objectives: Bullets 1,2 and 6	SA Indicator: 1.3 & 1.4 To promote waste management in accordance with waste hierarchy in order to maximise landfill diversion.
Monitoring: <u>Household Waste</u> Recycled or composted: 42% (139,307 tonnes) Not recycled or composted: 58% (193,018 tonnes) <u>Commercial and Industrial (estimate from Local Authority Collected Waste)</u> Recycled or composted: 33% Not recycled or composted: 67% POTENTIAL TO MEET 2016 AND 2021 TARGETS FOR HW TARGET PROBLEMATIC FOR C&I	Target and Source: <ul style="list-style-type: none"> By 2016, Proportion arisings recycled or composted: HW = 50%; C&I=70% By 2021 Proportion arisings recycled or composted HW=50%, C&I=70%
Delivery Partners: GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry	
Monitoring against Delivery: Assess target annually, actions on a rolling three year basis. Applicants to demonstrate positive carbon outcome of their facility having regard to the waste hierarchy (PPS10) using the WRATE model (Environment Agency) until it is replaced by the GLA model	
Contingencies: Contingencies: if target not being delivered and not enough capacity in planning pipeline, explore reasons for failure: contact waste management industry especially south London operators to explore reasons for lack of deliverability; also other outer London waste plan areas and south east (to facilitate comparison)	
Management Actions: Depending on reasons for failing target – as Policy WP1, Indicator 1	

POLICY WP1, Indicator 3	
Indicator: Proportion of HW and C&I arisings that are managed under “other recovery” in the waste hierarchy	
SLWP Objectives: Bullets 1,2 and 6	SA Indicator: 1.3 & 1.4 To promote waste management in accordance with the waste hierarchy in order to maximise landfill diversion
Monitoring: <u>Local Authority-Collected Waste (MSW + some C&I)</u> Incineration with ERF: 14% Incineration without ERF: Minute amount <u>Commercial and Industrial</u> Unknown NO TARGET	Target and Source: -
Delivery Partners: -	
Monitoring against Delivery: -	
Contingencies: -	
Management Actions: -	

POLICY WP2, Indicator 1	
Indicator: Amount of C, D & E waste landfilled annually	
SLWP Objectives: Bullets 1,2 and 6	SA Indicator: 1.4 To promote waste recycling or composting in accordance with the waste hierarchy in order to maximise landfill diversion
Monitoring: Estimated Arisings: 810,200 tonnes 5% of Arisings: 40,510 tonnes Landfilled in the Plan Area: 81,745 tonnes (10%) TARGET MISSED	Target and Source: That 5% or less of the London Plan arisings of CD&E waste attributed to the four boroughs in the SLWP area is landfilled.
Delivery Partners: GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry	
Monitoring against Delivery: Assess target annually, actions on a rolling three year basis	
Contingencies: If % of C D&E arisings sent to landfill is greater than 5% over a 3 year period and there is not capacity in the pipeline to manage this waste, then contact waste management industry to explore reasons and take management actions. Also comparison with surrounding areas and source of landfilled CD&E if possible.	
Management Actions: Depending on reasons for failing target. Consider working with EA, GLA and developers (e.g. housebuilders etc) to explore barriers and encourage greater onsite recycling	

POLICY WP3, Indicator 1	
Indicator: Number, site area (ha) and annual capacity (tonnes, waste stream throughput) of Schedule 1 sites	
SLWP Objectives: Bullets 3 and 6	SA Indicator: 1.2 To provide sufficient sites and waste management facilities in suitable locations to deal with all waste streams making up South London's future apportionment
Monitoring: Schedule 1 Sites Total Existing Sites: 25 (+1) Total Site Area: 29.55ha (+0.4) 2013 Capacity: 281,112 tonnes (-90,762 tonnes from South London Waste Plan baseline) Potential New Schedule 1 Sites (from unimplemented Planning Permissions) Total New Sites: 0 Total Site Area: 0 Potential Annual Capacity: 302,500 tonnes TARGET ACHIEVED WITH PLANNING PERMISSIONS	Target and Source: Number, site areas (ha) and capacity (tonnes, throughput, facility type) of Schedule 1 sites not to decrease unless compensatory capacity (tonnes, throughput, facility type) is provided elsewhere through facilities in line with other SLWP policies.
Delivery Partners: GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry	
Monitoring against Delivery: Assess target annually, actions on a rolling three year basis	
Contingencies: If target not met on rolling three year basis and no recovery in planning pipeline, explore reasons for failure through contact with waste management industry, comparison of capacity with surrounding areas, further Schedule 1 site assessments etc to inform management actions	
Management Actions: As Policy WP1, Indicator 1, plus could explore greater deliverability on Schedule 2 sites	

POLICY WP4, Indicator 1	
Indicator: Number, site area (ha) and annual capacity (tonnes, waste stream throughput) of new licensed waste facilities on Schedule 2 sites	
SLWP Objectives: Bullets 3 and 6	SA Indicator: 1.2 To provide sufficient sites and waste management facilities in suitable locations to deal with all waste streams making up South London's future apportionment
Monitoring: New Sites from Implemented Planning Permissions: 6 New Area: 3.76ha New Annual Capacity: 9,500 tonnes TARGET ACHIEVED	Target and Source: Additional waste management capacity (tonnes) to meet apportionment and strive to meet arisings (Target (capacity gap) in 2011 = up to 261,240 tonnes, which is approximately 4.29 hectares of land)
Delivery Partners: GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry	
Monitoring against Delivery: Assess target annually, actions on a rolling three year basis	
Contingencies: If target not met on rolling three year basis and no recovery in planning pipeline, explore reasons for failure through contact with waste management industry, comparison of capacity with surrounding areas, further Schedule 1 site assessments etc to inform management actions	
Management Actions: As Policy WP1, Indicator 1, plus could explore greater deliverability on Schedule 1 sites	

POLICY WP5, Indicator 1	
Indicator: For Part (a) Number, site area (ha) and annual capacity (tonnes, waste stream throughput) of waste management facilities approved under WP5	
SLWP Objectives: Bullets 3 and 6	SA Indicator: -
Monitoring: No management capacity approved. One waste transfer station approved IN A STRATEGIC INDUSTRIAL LOCATION, ADJACENT TO A SCHEDULE 2 AREA	Target and Source: (a) Reasons for Schedule 1 and 2 sites not being considered deliverable (suitable, available and achievable) to provide additional waste management capacity
Delivery Partners: -	
Monitoring against Delivery: Monitor annually, assess performance on a three-year rolling basis	
Contingencies: If more sites are being delivered through Policy WP5 because Schedule 1 and 2 sites are not being assessed as deliverable (i.e. suitable, available and achievable) then investigation of the reasons that Schedule 1 and 2 sites are not deliverable, and appropriate management actions to be taken	
Management Actions: As Policy WP1 Indicator 1 plus longer term action could be to designate new sites through DPD revision.	

POLICY WP5, Indicator 2	
Indicator: For parts (b) and (c), see WP1 and other	
SLWP Objectives:	SA Indicator: -
Monitoring: See Policy WP1	Target and Source: -
Delivery Partners: -	
Monitoring against Delivery: -	
Contingencies: -	
Management Actions: -	

POLICY WP5, Indicator 3	
Indicator: For part (d) (i), Number, area and condition of internationally, and nationally designated nature conservation sites (SSSIs, SPAs, SACs)	
SLWP Objectives: Bullets 4,6	SA Indicator: 8.1 To ensure that waste management sites and associated activities have no adverse impacts on internationally and nationally designated nature conservation sites
Monitoring: 0. One planning permission granted through WP5 and there will be no adverse effect on internationally or nationally regulated nature conservation areas. TARGET ACHIEVED	Target and Source: 0. (That no planning permissions for new waste management facilities on windfall sites are granted where the environmental assessment of the site demonstrates an adverse effect on internationally or nationally regulated nature conservation areas.)
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, GIGL, Natural England	
Monitoring against Delivery: Monitor per application using Habitat Regs Assessment, Biodiversity Assessments, GIGL data, quality assessments of SSSIs etc	
Contingencies: Contingencies: none – no permissions should be granted contrary to this element of the policy.	
Management Actions: Management actions: not applicable	

POLICY WP5, Indicator 4	
Indicator: For Part (d) (ii), number, area and condition of internationally, and nationally designated sites of historic importance	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 9.2 To conserve and enhance the quality of South London's built and historic environment
Monitoring: 0. One planning permission granted through WP5 and there will be no adverse effect on internationally or nationally regulated sites of historic importance. TARGET ACHIEVED	Target and Source: 0. (That no planning permissions for new waste management facilities on windfall sites are granted where the site assessment demonstrates an adverse effect on internationally or nationally regulated sites of historic importance)
Delivery Partners: Waste management industry, GLA, partner boroughs, English Heritage	
Monitoring against Delivery: Monitor per application using design and access statement etc	
Contingencies: Contingencies: none – no permissions should be granted contrary to this element of the policy.	
Management Actions: Management actions: not applicable	

POLICY WP5, Indicator 5	
Indicator: For part (d) (iii), number, area and capacity of permissions granted for sites under Policy WP5 contrary to Environment Agency advice on flooding	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 5.1 To avoid, reduce and manage flood risk affecting or arising from waste related developments
Monitoring: 0. One planning permission granted through WP5 and not granted contrary to Environment Agency advice. TARGET ACHIEVED	Target and Source: 0 (That no planning permissions for new waste management facilities on windfall sites are granted contrary to Environment Agency advice (PPS25 sequential test, impact assessments etc)
Delivery Partners: Environment Agency, waste management developers, partner boroughs	
Monitoring against Delivery: Monitor per application flood risk assessments and partner boroughs SFRAs and SWMPs	
Contingencies: Contingencies: none – no permissions should be granted contrary to this element of the policy.	
Management Actions: Management actions: not applicable	

POLICY WP5, Indicator 6	
Indicator: For bullet points, Number, area and capacity of sites that achieve positive results for all of the issues raised under the bullet points (precise monitoring details in WP7)	
SLWP Objectives: Bullets 4 and 6	SA Indicator: See indicators for WP7 below
Monitoring: 100%. The permission meets all the criteria TARGET ACHIEVED	Target and Source: 100% positive result for each indicator (see targets for WP7 below)
Delivery Partners: See delivery partners for WP7 below	
Monitoring against Delivery: -	
Contingencies: -	
Management Actions: -	

POLICY WP6, Indicator 1	
Indicator: Number of permissions granted for waste management facilities: • qualifying for bespoke BREEAM excellent • complying with each of the essential standards in the Mayor's Sustainable Design and Construction SPG	
SLWP Objectives: Bullets 2 and 6	SA Indicator: 4.4 To promote the highest sustainable design and construction standards
Monitoring: Croydon 12/02077: BREEAM: unknown SPG: complies with some Croydon 13/00455: BREEAM: unknown SPG: complies with some Merton 08/P2235: BREEAM: Excellent SPG: complies with most Merton 08/P2724: BREEAM: Very Good SPG: complies with most Merton 11/P3200: BREEAM: not rated SPG: complies with some Merton 12/P0232: BREEAM: not rated SPG: complies with some Merton 13/P1050: BREEAM: not rated SPG: complies with some Merton 13/P3797: BREEAM: not rated SPG: complies with some Sutton D2011/63923: BREEAM: unknown SPG: complies with some Sutton D2012/66220: BREEAM: Excellent SPG: complies with most Sutton D2013/67162: BREEAM: unknown SPG: complies with some Sutton D2013/68624: BREEAM: Excellent SPG: complies with most Sutton D2013/67833: BREEAM: not rated SPG: complies with some Sutton D2013/67584: BREEAM: not rated SPG: complies with some TARGET MISSED	Target and Source: 100% of waste management developments to qualify for bespoke BREEAM excellent and comply with each of the essential standards in the Mayor's Sustainable Design and Construction SPG
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, BRE	
Monitoring against Delivery: Monitor annually, actions on rolling 3 year basis	
Contingencies: Contingencies if performance does not fall within acceptable ranges - more than 20% of permissions granted over rolling three years fail to meet BREEAM excellent (bespoke) and the Mayor's SPD standards where these are feasible.	
Management Actions: Management actions: investigate with BRE/GLA why standards not being met, provide specific advice (e.g. BRE workshops) to support measures	

POLICY WP6, Indicator 2	
Indicator: For part (a), number of permissions granted which minimise carbon emissions in accordance with Table 4.6	
SLWP Objectives: Bullets 2 and 6	SA Indicator: -
Monitoring: Croydon 12/02077: Not stated Croydon 13/00455: Not stated Merton 08/P2235: c200 increase in carbon tonnage Merton 08/P2724: Not stated Merton 11/P3200: Building will be a passive shell Merton 12/P0232: Not stated Merton 13/P1050: Building will be a passive shell Merton 13/P3797: Will result in carbon reduction Sutton D2011/63923: Not stated Sutton D2012/66220: Depends on CHP connection Sutton D2013/67162: Not stated Sutton D2013/68624: Not stated Sutton D2013/67833: Not stated Sutton D2013/67584: Not stated UNABLE TO ASSESS TARGET	Target and Source: By 2013: 25% improvement on building regs compared to 2010 carbon emissions By 2016 40% improvement on building regs compared to 2010 carbon emissions By 2019 as per building regs requirements By 2031 – zero carbon
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, BRE	
Monitoring against Delivery: Monitor by development, towards targets in Table 4.6, use BREEAM assessment (BRE 2011 allows comparison between London Plan carbon targets and BREEAM	
Contingencies: BREEAM excellent is bespoke so contingencies can be built into the assessment with BRE	
Management Actions: If developments regularly not meeting BREEAM excellent bespoke, explore with BRE the reasons why, consider refusing permission or adapting scheme	

POLICY WP6, Indicator 3	
Indicator: For part (b), (monitored under same criteria as WP7)	
SLWP Objectives: -	SA Indicator: -
Monitoring: See monitoring indicators for Policy WP7	Target and Source: -
Delivery Partners: -	
Monitoring against Delivery: -	
Contingencies: -	
Management Actions: -	

POLICY WP6, Indicator 4	
Indicator: For part (c), Number of permissions incorporating SuDS, green roofs, rainwater harvesting	
SLWP Objectives: Bullets 2 and 6	SA Indicator: 4.4 To promote the highest standards of sustainable design and construction
Monitoring: Croydon 12/02077: No Croydon 13/00455: No Merton 08/P2235: No Merton 08/P2724: Green roof, SuDS, rainwater harvesting, climbers instead of green wall Merton 11/P3200: Rainwater harvesting Merton 12/P0232: No Merton 13/P1050: No Merton 13/P3797: No Sutton D2011/63923: No Sutton D2012/66220: Brown roof, SuDS, rainwater harvesting, new ponds Sutton D2013/67162: No Sutton D2013/68624: No Sutton D2013/67833: No Sutton D2013/67584: No TARGET MISSED	Target and Source: 100% of waste management developments to incorporate SuDS and appropriate climate change adaptation measures where possible
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency	
Monitoring against Delivery: Monitor annually, actions on rolling 3 year basis	
Contingencies: If performance does not fall within acceptable ranges - more than 20% of permissions granted over rolling three years fail to incorporate climate change adaptation measures where these are feasible	
Management Actions: Investigate which climate change adaptation measures not being met, and reasons; provide specific advice (e.g. workshops, SPD) to encourage measures	

POLICY WP7, Indicator 1	
Indicator: Number of delivered waste management facilities within a fully enclosed covered building	
SLWP Objectives: Bullets 2, 4 and 6	SA Indicator: 6.1 To improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health.
Monitoring: Croydon 12/02077: No Croydon 13/00455: Yes Merton 08/P2235: Yes Merton 08/P2724: Yes Merton 11/P3200: No Merton 12/P0232: Yes Merton 13/P1050: Yes Merton 13/P3797: Yes Sutton D2011/63923: Yes Sutton D2012/66220: Yes Sutton D2013/67162: Yes Sutton D2013/68624: Yes Sutton D2013/67833: No Sutton D2013/67584: Yes TARGET MISSED	Target and Source: 100% of waste management developments to be within a fully enclosed, covered facility.
Delivery Partners: Waste management industry	
Monitoring against Delivery: Monitor annually	
Contingencies: Contingencies if any waste management development is granted permission where the management aspects of any waste management development (e.g. MRF, not storage of materials) is not enclosed	
Management Actions: Explore reasons for decision and ensure that no treatment element of waste management facilities is not within an enclosed building	

POLICY WP7, Indicator 2	
Indicator: For part (a), number of facilities with no or a positive impact on Green Belt or MOL	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 7.1 To safeguard permanence and integrity of Green Belt and MOL
Monitoring: Croydon 12/02077: No impact Croydon 13/00455: No impact Merton 08/P2235: No impact Merton 08/P2724: No impact Merton 11/P3200: No impact Merton 12/P0232: No impact Merton 13/P1050: No impact Merton 13/P3797: No impact Sutton D2011/63923: No impact Sutton D2009/61962: No impact Sutton D2012/66220: No Impact Sutton D2013/68624: No impact Sutton D2013/67833: No impact Sutton D2013/67584: No impact TARGET MISSED	Target and Source: 100% of waste management developments to have no or a positive impact on Green Belt / MOL
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency	
Monitoring against Delivery: Monitor annually, actions on rolling 3 year basis (design and access statement)	
Contingencies: Explore reasons for failure within specific planning decisions.	
Management Actions: Provide more detailed assessment (e.g. via SPD) Schedule 1 and 2 sites in relation to open characteristics of Green Belt / MOL	

POLICY WP7, Indicator 3	
Indicator: For part (b), number of facilities which do not harm biodiversity especially on internationally and nationally protected nature conservation areas (SSSIs, SAC, SPA, SINC etc)	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 8.1 To ensure that waste management sites and associated activities have no adverse impacts on internationally and nationally designated nature conservation sites
Monitoring: Croydon 12/02077: No impact Croydon 13/00455: No impact Merton 08/P2235: No impact Merton 08/P2724: No impact Merton 11/P3200: No impact Merton 12/P0232: No impact Merton 13/P1050: No impact Merton 13/P3797: No impact Sutton D2011/63923: No impact Sutton D2012/66220: No impact Sutton D2013/67162: No impact Sutton D2013/68624: No impact Sutton D2013/67833: No impact Sutton D2013/67584: No impact TARGET ACHIEVED	Target and Source: 0. (That no planning permissions for new waste management facilities are granted where the environmental assessment of the site demonstrates an adverse effect on internationally or nationally regulated nature conservation areas.)
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, GIGL, Natural England	
Monitoring against Delivery: Monitored annually Biodiversity Assessment for applicants, comparison with GIGL data, quality assessments of SSSIs etc	
Contingencies: Explore reasons for failure within specific planning decisions.	
Management Actions: Provide more detailed assessment (e.g. via SPD) of biodiversity characteristics of Schedules 1 and 2 sites	

POLICY WP7, Indicator 4	
Indicator: For part (c), number of facilities which do not harm archaeological sites, the historic environment and sensitive receptors	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 1.11 Protecting and enhancing the quality of the local environment for residents living near waste management facilities
Monitoring: Croydon 12/02077: No impact Croydon 13/00455: No impact Merton 08/P2235: No impact Merton 08/P2724: No impact Merton 11/P3200: No impact Merton 12/P0232: No impact Merton 13/P1050: No impact Merton 13/P3797: No impact Sutton D2011/63923: No impact Sutton D2012/66220: No Impact Sutton D2013/67162: No impact Sutton D2013/68624: No impact Sutton D2013/67833: No impact Sutton D2013/67584: No impact TARGET ACHIEVED	Target and Source: 0
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, English Heritage	
Monitoring against Delivery: Monitor annually, actions on rolling 3 year basis (design and access statement)	
Contingencies: Explore reasons for failure within specific planning decisions	
Management Actions: Provide more detailed assessment (e.g. via SPD) of characteristics of Schedules 1 and 2 sites	

POLICY WP7, Indicator 5	
Indicator: For part (d), number of facilities which do not harm groundwater surface water and watercourses	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health
Monitoring: Croydon 12/02077: No impact (Condition imposed) Croydon 13/00455: No impact (Condition imposed) Merton 08/P2235: No impact (Condition imposed) Merton 08/P2724: No impact (Condition imposed) Merton 11/P3200: No impact (Condition imposed) Merton 12/P0232: No impact (Condition imposed) Merton 13/P1050: No impact (Condition imposed) Merton 13/P3797: No impact (Condition imposed) Sutton D2011/63923: No impact Sutton D2012/66220: No Impact (Condition imposed) Sutton D2013/67162: No impact (Condition imposed) Sutton D2013/68624: No impact (Condition imposed) Sutton D2013/67833: No impact (Condition imposed) Sutton D2013/67584: No impact TARGET ACHIEVED	Target and Source: 0
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency	
Monitoring against Delivery: Monitor annually, actions on rolling 3 year basis (flood risk assessments in comparison with partner boroughs SFRAs and SWMPs)	
Contingencies: Explore reasons for failure within specific planning decisions	
Management Actions: Improve design guidance to minimise flood risk, co-ordinate enforcement action for breaches with EA and partner boroughs	

POLICY WP7, Indicator 6	
Indicator: Improve design guidance to minimise flood risk, co-ordinate enforcement action for breaches with EA and partner boroughs	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health
Monitoring: 0 TARGET ACHIEVED	Target and Source: 0
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency	
Monitoring against Delivery: Monitor annually, actions on rolling 3 year basis (air quality assessments in comparison with partner boroughs especially Air Quality Management Areas). Also enforcement complaints and actions from active facilities	
Contingencies: Explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions	
Management Actions: Improve design guidance to minimise air pollution, co-ordinate enforcement action for breaches with EA and partner boroughs.	

POLICY WP7, Indicator 7	
Indicator: For part (f), number of facilities which do not demonstrate minimal impact from noise	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 6.2 to minimise the impact of noise and vibration from existing or new waste facilities and related activities
Monitoring: Croydon 12/02077: No impact (Condition imposed) Croydon 13/00455: No impact (Condition imposed) Merton 08/P2235: No impact (Condition imposed) Merton 08/P2724: No impact (Condition imposed) Merton 11/P3200: No impact (Condition imposed) Merton 12/P0232: No impact (Condition imposed) Merton 13/P1050: No impact (Condition imposed) Merton 13/P3797: No impact (Condition imposed) Sutton D2011/63923: No impact Sutton D2012/66220: No Impact (Condition imposed) Sutton D2013/67162: No impact (Condition imposed) Sutton D2013/68624: No impact (Condition imposed) Sutton D2013/67833: No impact (Condition imposed) Sutton D2013/67584: No impact (Condition imposed) TARGET ACHIEVED	Target and Source: 0
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, DEFRA	
Monitoring against Delivery: Monitor annually, actions on rolling 3-year basis (noise impact assessment). Also EA and borough enforcement of active waste management facilities. Also comparison with DEFRA's Road Traffic Noise Map.	
Contingencies: Explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	
Management Actions: Improve design guidance to minimise noise, co-ordinate enforcement action for breaches with EA and partner boroughs.	

POLICY WP7, Indicator 8	
Indicator: For part (g), number of facilities which do not demonstrate minimal impact from traffic (noise, air pollution etc)	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health
Monitoring: Croydon 12/02077: No impact (Condition imposed) Croydon 13/00455: No impact (Condition imposed) Merton 08/P2235: No impact (Condition imposed) Merton 08/P2724: No impact (Condition imposed) Merton 11/P3200: No impact (Condition imposed) Merton 12/P0232: No impact (Condition imposed) Merton 13/P1050: No impact (Condition imposed) Merton 13/P3797: Reduction in traffic movements Sutton D2011/63923: No impact Sutton D2012/66220: No Impact (Condition imposed) Sutton D2013/67162: No impact (Condition imposed) Sutton D2013/68624: No impact (Condition imposed) Sutton D2013/67833: No impact (Condition imposed) Sutton D2013/67584: No impact (Condition imposed) TARGET ACHIEVED	Target and Source: 0
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, DEFRA	
Monitoring against Delivery: Monitor annually: Travel plan, transport assessments, route management strategy, access strategy, delivery servicing / freight plan. Also enforcement complaints and actions from active facilities	
Contingencies: Explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	
Management Actions: Improve design guidance to minimise vehicle movements and their impacts, co-ordinate enforcement action for breaches with EA and partner boroughs.	

POLICY WP7, Indicator 9	
Indicator: For part (h), number of facilities which demonstrate no impact from odour, litter, vermin and birds	
SLWP Objectives: Bullets 4 and 6	SA Indicator: 6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health
Monitoring: Croydon 12/02077: No impact Croydon 13/00455: No impact Merton 08/P2235: No impact (Condition imposed) Merton 08/P2724: No impact (Condition imposed) Merton 11/P3200: No impact Merton 12/P0232: No impact Merton 13/P1050: No impact (Condition imposed) Merton 13/P3797: Odour Management Plan requirement Sutton D2011/63923: No impact Sutton D2012/66220: No Impact (Condition imposed) Sutton D2013/67162: No impact (Condition imposed) Sutton D2013/68624: No impact Sutton D2013/67833: No impact (Condition imposed) Sutton D2013/67584: No impact TARGET ACHIEVED	Target and Source: 100%
Delivery Partners: Waste management industry, GLA, partner boroughs, Environment Agency, DEFRA	
Monitoring against Delivery: Monitor annually, including enforcement actions on active facilities: landscape assessments, odour assessments	
Contingencies: Explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	
Management Actions: Improve design guidance to minimise impacts and co-ordinate enforcement action for breaches with EA and partner boroughs.	

POLICY WP8, Indicator 1	
Indicator: Number of developments granted for energy from waste facilities that demonstrate a positive carbon outcome	
SLWP Objectives: Bullets 2, 4 and 6	SA Indicator: 1.3 & 1.4 To promote waste management in accordance with the waste hierarchy in order to maximise landfill diversion
Monitoring: Sutton D2012/66220: Depends on CHP connection UNABLE TO ASSESS TARGET	Target and Source: 100%
Delivery Partners: GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry, BRE	
Monitoring against Delivery: Assess target annually, actions on a rolling three year basis. Applicants to demonstrate positive carbon outcome of their facility having regard to the waste hierarchy (PPS10) using the WRATE model (Environment Agency) until it is replaced by the GLA model	
Contingencies: If target not being delivered and not enough capacity in planning pipeline, explore reasons for failure: contact waste management industry especially south London operators to explore reasons for lack of deliverability; also other outer London waste plan areas and south east (to facilitate comparison)	
Management Actions: Depending on reasons for failing target.	



6. Conclusions

Capacity, Arisings and Targets

- 6.1** The South London Waste Plan has missed its projected targets for the quantity of Household Waste (HW) and Commercial and Industrial (C&I) Waste managed in 2013 and there has been a decline in the amount of HW and C&I waste managed. This is largely due to changes in ownership on existing sites. However, with new planning permissions providing potentially 443,000 tonnes of capacity, there is a likelihood that the targets for these waste streams will be met in 2016 and 2021. Future capacity appears to be very dependent on whether waste operators built out their planning permissions.
- 6.2** It is difficult to draw firm conclusions from the analysis of Construction, Demolition and Excavation (C, D and E) Waste but it appears that the plan area has missed its 95% recycling target. More than 10% of the plan area's arisings were landfilled at Beddington Farmlands and landfill activity is likely to increase until restoration is complete in 2017.

Changes to Schedules 1

- 6.3** There have been a number of changes to the Schedule 1 sites to reflect the recent changes in ownership and there has been one addition: a metal recycling facility in Croydon.

Policy Analysis

- 6.4** The HW recycling and composting rate is currently 42% while the C&I recycling or composting rate is estimated to be 33%. The HW rate will need to improve to meet its target of 50% but it is doubtful whether the C&I rate will hit its target.
- 6.5** The planning permissions granted during the monitoring period suggest that attention is being paid to conventional planning concerns, such as the Green Belt/Metropolitan Open Land, nature conservation, the historic and built environment, water, noise, traffic impact and environmental health. The

exception to this observation is the Energy Recovery Facility on Beddington Farmlands where the possibility to provide a state-of-the-art waste facility providing heat and power justified the use of Metropolitan Open Land.

- 6.6** Additionally, 11 of the 14 permissions will have waste activities undertaken in a fully enclosed, covered building, which is a major policy aim of the South London Waste Plan. It is hoped that, in the future, all planning permissions for waste activities will ensure that waste treatment activities are undertaken in a full enclosed, covered building.
- 6.7** However, issues relating to sustainability and/or climate change have not had such an impact. Only three of the permissions will meet the BREEAM Excellent standards.

Management Actions

- 6.8** No management actions to deal with failing policies are planned. The boroughs have stated that they will only take action on the basis of a three-year rolling average, as this will mitigate for exceptional annual monitoring returns. However, the councils will monitor the building out of planning permissions closely.



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