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The Draft South London Waste Plan 2021-2036

The London Borough of Sutton Council has invited representations on the Draft South London Waste Plan 2021-2036, produced by the London Borough of Croydon, Royal Borough of Kingston, London Borough of Merton and London Borough of Sutton.

As the Member of Parliament for Carshalton & Wallington in the London Borough of Sutton, I wish to submit the following representation to be considered as part of the Publication Stage of the Plan consultation.

Having reviewed the draft plan and supporting evidence I want to raise a few issues:

- The potential overestimation of capacity in the four boroughs;
- Increased cumulative impacts of intensifying Beddington waste facilities, and;
- Energy recovery facility and compliance with carbon targets.

<u>The potential overestimation of capacity in the four boroughs</u>

One of the key visions of the South London Waste Plan (SLWP) is to create a waste management process that is self-sufficient within the four boroughs of Croydon, Kingston, Merton and Sutton. Whilst this vision is certainly admirable and largely supported in principle, there remain questions over the capacity for the four boroughs to deliver on that.

The SLWP's predictive modelling suggests that the four boroughs will be operating with excess capacity to manage their waste by the end of the plan term. The plan goes further and suggests that the four boroughs will be capable of and committed to managing more waste than they generate: "In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generated."[1] This roughly calculates as an extra 104,750 tpa to manage on top of the waste generated by the four boroughs themselves.

In 2017, the four boroughs exported 300,000 tpa waste. 108,000 tpa of this total will, in future, be managed by Beddington.[2] It is unclear from the plan documents whether the remaining 192,000 tpa waste, which was exported in 2017, will continue to be exported or managed within the four boroughs. Regardless, the inclusion of the exported 192,000 tpa waste is more than enough to fill the extra capacity gap of the four boroughs.

The SLWP makes it clear that the four boroughs are currently net importers of waste with 620,000 tpa imported in 2017. As above, it is unclear whether the sources of the 620,000 tpa imports will continue to be managed by the four boroughs going forward.

Further, the are concerns about the forecast and estimates for the waste arisings and apportionments due to the baseline datasets. 2017 tpa waste figures are used by the GLA as the baseline for the predictive modelling.

Policy 2 of the National Planning Policy for Waste (2014) makes it clear that waste authorities "ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. Spurious precision should be avoided."

The entire SLWP (2019) strategy is based on waste data that is three years out of date, and likely to be even more be even more by the time it is due to be adopted. It is also likely that households waste generation has and will continue to grow over the coming weeks, months and years if people continue to work from home, rather than commuting into working, due to COVID-19 (as has been monitored in other waste authorities).[3] Concerningly, the impact of COVID-19 is not referenced at all within the plan or accompanying documents.

The best available data has not been used as the evidence base for this plan, as per Policy 2 of the NPPW. Therefore, the strategy of the plan cannot be justified, bringing into question the soundness of the document.

The SLWP's predictive arisings and apportionments for the four boroughs are not just modelled from past waste data, but also take into account a reduced 5% waste target for the four boroughs. Whilst a strategy to reduce waste is, of course, welcomed in principle, there needs to be a plan in place to ensure that that target is achievable.

Policy S18b of the Draft London Plan (2019), states that development documents must "identify how waste will be reduced." And, the London Environment Strategy states that plans should demonstrate how they "help move waste up the waste hierarchy to ensure a greater focus on reduction, reuse and recycling."[4] Despite this, the SLWP does not contain sufficient information to demonstrate how it will reach the 5% waste reduction target and help move waste up the hierarchy.

Sutton Council already has a recent history of failing to discharge their responsibilities with regards to household waste collection. To ensure the entire SLWP's strategy is achievable, greater work is needed to plan with the waste authorities the realistic roadmap to achieving this.

These concerns may seem minor on paper but in reality they could have huge implications. Without reliable evidence bases and predictive modelling, there is a very real concern that the capacity for waste management is overestimated for the four boroughs. In the years to come, this could result in unacceptable cumulative impacts from a local waste process that is working overcapacity.

Increased cumulative impacts of intensifying Beddington waste facilities

The SLWP seemingly places great responsibility on Beddington to provide extra capacity for waste management. As well as the extra 107, 952 tpa waste from 2017 that will be managed in lieu of the Slough site, there also could be compensatory capacity heading to Beddington in lieu of the Benedict Wharf site in Merton, which has a capacity of 275,000 tpa. Despite this, page 81 on the Plan states that there is "no opportunities to upgrade or intensify operations at the current time."

These two extra contributions in Beddington alone were not considered when planning permission was given to the recycling facility and the ERF in Beddington. Combined, this totals over 21,000 annual vehicle movements to and from Beddington Lane based on Veolia's 18-tonne waste collection vehicle fleets. Whilst the Beddington Energy Recovery Facility is supposedly strictly monitored for its emissions, the related vehicle emissions to and from the site are not included in these limits (more on emissions below).

The SLWP Technical Paper states that "there is a major traffic congestion [sic] in nearby Beddington SIL, particularly on Beddington Lane".[5] Likewise, the SLWP suggests that if further applications are to be considered, the plan suggests "undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads."

The increased pressure on Beddington to support waste management across the four boroughs has not been given enough consideration. The NPPW suggests that waste plans should consider the "suitability of the road network" when potentially enhancing waste management facilities.[6]

Paragraph 102b of the National Planning Policy Framework also places great importance of considering the impact of traffic during plan making:

"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains."

Despite this, there doesn't appear to be any identification of the traffic impact of the SLWP or proposals to mitigate the impact.

Without identifying the true impact of the traffic generated from the potential new waste streams into the four boroughs within the SLWP, it cannot be certain that the plan complies with national planning policy and, therefore, brings doubt over the soundness of the document.

Energy recovery facility and compliance with carbon targets

Beddington is home to a new Energy Recovery Facility (ERF), which incinerates household waste to generate electricity for the grid, as well as hot water and heating for the nearby New Mill Quarter housing estate of approximately 800 properties.

Despite not being fully operational, the ERF has already become the greatest air polluter in Sutton. Furthermore, throughout this year alone there have been several incidences where emissions at the ERF have breached limits or, more often, not been reported at all (invalid report).

Because of regular breaches at the Beddington incinerator, the Environment Agency has increased the frequency of reporting from every half hour to every 10 minutes. The 10-minute maximum imposed by the Environment Agency is mg per cubic metre. On 26 January, the emissions from just one of the Beddington incinerator's two chimneys were nearly five times that level, and consequently it was shut down for two days. The other chimney was even worse and exceeded emissions limits on 2, 14, 20 and 26 January. On 26 January the level was 10 times over the limit. To add insult to injury, the operators were still registering at least one invalid report almost every day of the month and, as mentioned above, this is does not take into account the vehicle emissions transporting the waste.

This is a critical issue when assessing waste services and carbon emissions in South London.

The emerging London Plan places strict limits on carbon emissions generated from energy recovery facilities:

*"To support the shift towards a low-carbon circular economy, all facilities generating energy from waste should meet, or demonstrate that they can meet in future, a measure of minimum greenhouse gas performance known as the carbon intensity floor (CIF). The CIF is set at 400g of CO2 equivalent generated per kilowatt hour (kwh) of electricity generated."***[7]**

Without reliable and consistent emissions data from Beddington ERF, it cannot be confirmed that the facility complies with the London Plan emissions limits.

Further, upon a recent visit to the ERF earlier in the year, I was concerned to find out that on numerous occasions, emission levels will spike when inappropriate materials are incinerated, rather than recycled or dealt with in another way. One such example is gas canisters. It's concerning that such highly polluting objects are not extracted from the waste stream before incineration. Likewise, less harmful recyclable materials are also wrongly being incinerated, instead of recycled.

When I enquired with Viridor what processes are in place to prevent inappropriate domestic waste materials from being incinerated, I was informed that little was actively done to remove these materials once they entered the waste stream at collection. With the exception of staff briefly looking at the waste when collected from homes and deposited at the ERF, little is done to primarily identify and extract inappropriate materials. Whilst it's true that prevention is always the best method of stopping materials being incinerated, starting at the home, there is still more to be done at the incineration site to tackle this issue.

Emphasis is placed on this in the London Environment Strategy:

*"Waste going to EFW plants often contains large amounts of recyclable materials that are high carbon and high value. Reducing the amount of high carbon materials particularly plastics and metals going to EFW plants will deliver GHG savings, and reduce the reliance on fossil fuels. This will drive change and investment within boroughs and with facility operators, to ensure that truly residual waste is used to generate both heat and power for the benefit of Londoners."***[8]**

The draft South London Waste plan need to pay greater attention to addressing the emissions reports and incineration of inappropriate materials at Beddington ERF. Whilst I appreciate it is difficult to alter processes at a functioning waste removal facilities, it is important to target these particular issues of concern. As has been demonstrated elsewhere in the world, mechanical and biological treatment processes can help filter out inappropriate materials from the waste stream before incineration and contribute towards reducing emissions.

Conclusion

I have highlighted three major queries in this letter which I believe contravene local and national waste and planning policy. These areas need further consideration before the emerging South London Waste Plan is adopted. Whilst I welcome, in principle, improved efficiency of the waste process in our area and appreciate the need to be self-sufficient, there needs to be thoughtful consideration of the cumulative impacts of intensifying waste facilities in South London.

Further, there is insufficient data provided to truly establish the waste capacity in South London over the coming years. Without reliable evidence bases and predictive modelling, there is a very real concern that the capacity for waste management is overestimated for the four boroughs.

Finally, I appreciate that it is unrealistic to merely wish away all of the negative impacts of

the Beddington ERF in my constituency without an alternative solution. However, at the very least, more needs to be done to address concerns regarding emissions limits, as well as consider the introduction of new techniques to ensure inappropriate materials are filtered out of the waste process.

I hope you will consider the points raised in this letter as the process to adopt a new South London Waste Plan continues.

With best wishes,

Elliot Colburn
Conservative Member of Parliament for Carshalton and Wallington

[1] SWLP 2021 publication draft, para. 5.5

[2] SWLP 2021 publication draft, para. 3.8

[3] https://www.gateshead.gov.uk/article/16221/Lockdown-leads-to-big-increase-in-household-waste

[4] London Environment Strategy 2018, pg. 292

[5] SWLP Technical Paper Appendices 2021, pg. 136

[6] National Planning Policy for Waste 2014, policy 5

[7] London Plan 2019, para. 9.8.14

[8] London Environment Strategy 2018, pg. 323