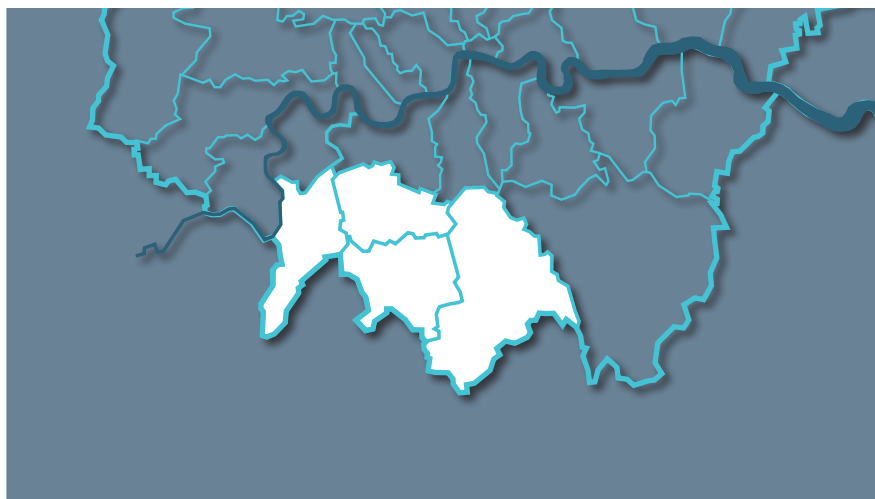


- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London Waste Plan



EQUALITIES IMPACT ASSESSMENT (EqIA) Addendum Report on Main Modifications

June 2022

EQUALITIES IMPACT ASSESSMENT (EqIA)

Addendum Report on Proposed Modifications

Draft South London Waste Plan (SLWP)

June 2022

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1. Background

Introduction

1.1 This Equalities Impact Assessment (EqIA) Addendum Report assesses the impacts of each of the Main Modifications to the draft South London Waste Plan (SLWP) on each of the key equality target groups within the four partner boroughs. The four partner boroughs have prepared a final consolidated schedule of Main Modifications to the draft SLWP arising from the outcome of the Examination in Public (EiP) Hearing which took place from 1-2 September 2021 and the Inspectors' subsequent recommendations on further changes needed to address outstanding issues. The consolidated schedule sets out all material changes made to the draft SLWP compared to the Regulation 19 submission version published in January 2021 and supersedes the previous schedules of Main Modifications prepared in March and July 2021 respectively (Examination Doc SLWP02a and SLWP02b). It also has a new number system.

1.2 This Final EqIA Addendum Report on Main Modifications has been prepared for final public consultation alongside the Sustainability Appraisal (SA) Addendum Report and the consolidated schedule of Main Modifications itself.

1.3 This report should be read in conjunction with the previous EqIA Reports on the Draft SLWP (Proposed Submission) prepared for Regulation 19 consultation in September 2020 and the EqIA Screening Report prepared on the SLWP Issues and Preferred Options document in October 2019.

1.4 The following sections provide a re-cap of the context within which the the SLWP is being prepared, in terms of the purpose of the new plan and the stages in its preparation.

Purpose of the new South London Waste Plan

1.5 The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new SLWP covering the time period 2022-37. When it is adopted in 2022-23, the new plan will replace the previous SLWP 2011-21¹ introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the New London Plan 2021 up to 2036, including the aim of achieving net self-sufficiency by 2026; and
- setting out planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy, promote the circular economy and minimise any adverse impacts upon on nearby land uses and the local environment.

1.6 A new plan is needed from 2022 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaborative working at the sub-regional level is essential for effective waste planning.

¹ the current South London Waste Plan 2012 is available at <https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view>
EqIA Addendum Report on South London Waste Plan Proposed Modifications (June 2022)

Stages in the preparation of the draft plan

1.7 Following initial public consultation on Issues and Preferred Options and an accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation²), a draft version of the SLWP 2021-36 (Proposed Submission) was published for further consultation together with an accompanying SA Report³ incorporating an EqIA (Appendix 1) between 4 September and 22 October 2020 (Regulation 19 consultation⁴). The draft plan, which incorporated a number of changes made in the light of representations received and changing circumstances, proposes to safeguard 46 existing sites for waste uses and identifies ten development management policies to guide planning applications for new or intensified waste facilities within the four boroughs over the next 15 years.

1.8 On 19 January 2021, the draft SLWP was submitted to the Secretary of State for Housing, Communities and Local Government for Examination-in-Public (EiP) in line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft plan was accompanied by a number of submission documents, including the the SA Report incorporating EqIA; a Schedule of Main Modifications arising from Regulation 19 consultation; the Sequential Test (flood risk); the Duty to Cooperate Statement; Statement of Consultation, Technical Papers and site appraisals.

1.9 Subsequently, in July 2021, five 'matters statements' were prepared as part of a further submission to the EiP together with a schedule of further proposed changes to the plan in order to address each of the matters, issues and questions (MIQs) previously identified by the Inspector. The matters statements covered the following topics:

- Matter 1: Is the Plan legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been discharged?
- Matter 2: Is the Plan in general conformity with the London Plan?
- Matter 3: Does the Plan make adequate provision for the waste management apportionments required by the London Plan and any other arisings, and is it positively prepared in this regard?
- Matter 4: Does the Plan set out an effective suite of policies for the management of waste in the area; and are they justified and consistent with national policy?
- Matter 5: Does the Plan set out effective mechanisms for its implementation and monitoring?

1.10 The EqIA Report prepared previously for Regulation 19 consultation between September and October 2020 (see above) formed part of the above submission to the EiP.

1.11 Following the EiP Hearing into the draft SLWP, which was held at the Merton Council Chamber between 1-2 September 2021, the Inspectors prepared closing remarks on the outcome of the hearings (2 September 2021) and subsequently a post-hearing letter on 7 September 2021⁵ which set out the next steps for preparing and consulting upon the final schedule of Main Modifications.

1.12 The final consolidated schedule of Main Modifications to the draft SLWP has now been prepared for public consultation alongside the SA Addendum Report and the EqIA (this document).

1.13 Adoption of the of the final SLWP 2022-2037 is expected later in 2022 subject to Full Council approval in each of the four partner Boroughs.

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

³ the SA Report on the draft SLWP (Proposed Submission) included an Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment screening report. A Sequential Test (flood risk) on the draft SLWP was prepared as a separate consultation document.

⁴ under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

⁵ the Inspectors' Post-Hearing Letter can be viewed at <https://drive.google.com/file/d/1g8USKHZTGYh4hz6XqdGLDQpQ4kphfKkl/view>
EqIA Addendum Report on South London Waste Plan Proposed Modifications (June 2022)

What is an EqIA?

1.14 An EqIA is defined by the Equality and Human Rights Commission⁶ as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making.

1.15 EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and sex equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including joint development plan documents) from April 2011, local authorities still have a legal duty to “give due regard” to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying.

1.16 When applied to planning policy documents such as the SLWP, the first stage of EqIA involves screening to identify the potentially beneficial and adverse impacts of emerging policies and proposals on each of the specific equality target groups and to identify any gaps in knowledge. Then - where any potentially significant adverse effects are identified and/or if the potential impact is not intended and/or illegal - a full stage 2 assessment should be carried out. This should focus on the significant negative impacts and identify possible mitigation measures. Consultation with stakeholders and members of equality target groups should be undertaken during this phase.

1.17 This EqIA Addendum Report effectively finalizes the full stage 2 assessment and should be read in conjunction with the previous EqIA Report on the Proposed Submission SLPW prepared for Regulation 19 consultation in October 2020

Legislation

1.18 The requirement to consider the impacts of policies and strategies upon certain equality target groups through EqIA process arises from the following legislation.

Race Relations (Amendment) Act 2000

1.19 This amendment required local authorities to be pro-active in promoting racial equality by undertaking a Race Equality Impact Assessment of their strategies and plans.

Disability Discrimination (Amendment) Act 2005

1.20 The Act required local authorities to promote equality of opportunity for disabled people by ensuring that their policies, practices, procedures and services do not discriminate against them.

Equality Act 2006

1.21 The Act established the Commission for Equality and Human Rights (CEHR) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC).

Gender Equality Duty 2007 (as required by the Equality Act 2006)

1.22 This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote sex equality. There is a requirement to produce and

⁶ see <http://www.equalityhumanrights.com>

publish a gender equality scheme. As part of this, the authorities must assess the impact of their existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

Equality Act 2010

1.23 The Equality Act 2010 brought together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act simplifies, strengthens and harmonises the previously existing legislation in order to protect individuals from unfair treatment and promotes a fair and more equal society. The main pieces of legislation that have merged are:

- Sex Discrimination Act 1975;
- Race Relations Act 1976;
- Disability Discrimination Act 1995;
- Employment Equality (Religion or Belief) Regulations 2003;
- Employment Equality (Age) Regulations 2006;
- Equality Act 2006, Part 2; and
- Equality Act (Sexual Orientation) Regulations 2007.

1.24 Section 149 of the Act introduces a 'general duty' on all public sector bodies to have regard to the following considerations in the exercise of their functions:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.25 In seeking to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic', public bodies should have regard to:

- removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1.26 The relevant protected characteristics are age; disability; sex reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

LB Croydon Equality Strategy 2020-2024

1.27 The Equality Strategy for Croydon 2020-24, which has been developed in partnership with Croydon's residents, businesses, voluntary and community sector and staff, seeks to deliver a combined strategic Vision for the London Borough of Croydon as **"a place of opportunity where everyone can belong, addressing the needs and aspirations of all those who live and work in the borough"**.

1.28 This Vision is supported by the following equalities outcomes and objectives:

Outcomes and Objectives

Outcome 1: The Council addresses social inequities as a community leader and employer.

- Objective 1: The Council's workforce reflects our diverse communities at all levels;
- Objective 2: The Council acts as a role model and champions a fair society;
- Objective 3: We ensure equality training is central to the way work, is regularly undertaken, and is reviewed to meet changing needs.

Outcome 2: We work with residents to better understand our communities.

- Objective 1: Continue to increase our network across seldom heard groups;
- Objective 2: Information about the Council's work towards tackling inequality is easy to access and understand;
- Objective 3: Data about local communities is more effectively collected, analysed and used to inform decisions and improve services.

Outcome 3: Use partnerships to improve access and meet individual needs as they arise.

- Objective 1: Enable better education outcomes by offering support to groups who need it most;
- Objective 2: Support the creation of jobs that enhance quality of life; and
- Objective 3: Services are proactive in targeting group that have accessibility issues as a result of disability, age, mental health, disability, language, digital and/or physical barriers.
- Objective 4: Inequalities that lead to school exclusions and young people entering the criminal justice system are addressed, specifically for black boys, white working class boys, gypsy roma and travellers, and those accessing free school meals.

Outcome 4: People in Croydon are supported to be in good health.

- Objective 1: Work with partners to tackle social isolation and bring people together;
- Objective 2: With our partners use our knowledge of specific health challenges to support improvements; and
- Objective 3: We work with our partners to open the door to health services, and support them to make sure residents know where and how to access services.

RB Kingston Equality Diversity and Inclusion Strategy 2021-2025

1.29 Kingston's Equality Diversity and Inclusion Strategy 2021-2025 sets out the following Vision and objectives.

Vision

We will learn from, and improve our understanding of, the diverse communities we serve. We will celebrate our diversity and champion communities, making sure that Kingston is a safe and welcoming borough for all. We will identify, design and deliver accessible and inclusive services that meet the diverse needs of communities, and we will be the best employer for people of all backgrounds

Objectives

Objective 1: Listen to, and learn from, the diverse communities we serve. We will do this by:

- increasing engagement with and participation from minority, seldom heard, protected and vulnerable groups;
- talking to residents about how combinations of equality aspects influence their experiences of services and the borough; and
- improving the quality of the data and information we collect and the way it is used to assess the impact of decisions.

Objective 2: Celebrate the diversity of our borough and champion communities, making sure that Kingston is a safe borough for all We will do this by:

- encouraging mutual understanding between and across all communities;
- working with partners, residents, businesses and communities to challenge discrimination and tackle harassment and hate crime; and
- working with communities to develop a clear shared vision of Kingston for all to take ownership of

Objective 3: Deliver accessible and inclusive policies and services that meet the diverse needs of communities We will do this by:

- strengthening equality analysis in service planning and decision making across the organisation
- designing with, rather than for, communities, engaging effectively before services are developed;
- developing strong oversight and management to monitor progress and identify areas of further opportunity; and
- improving the systems we use to identify who is using our services and how satisfied they are with these services

Objective 4: Be the best employer for people of all backgrounds We will do this by:

- being a representative workforce which promotes equalities;
- reaching into the community to tap into our borough's vast talent and potential;
- placing inclusivity and wellbeing being at the heart of service delivery and throughout the entire employee lifecycle;
- valuing and respecting each other and challenging poor behaviour;
- listening to each other and encouraging everyone to be themselves at work;
- striving to follow equal opportunities best practice in both our policies and approaches; and
- ensuring an informed workforce who understand the importance of equality when making decisions.

LB Merton Equality and Community Cohesion Strategy 2017-2021

1.30 Merton's Equality and Community Cohesion Strategy 2017-2021 sets out the following aims and objectives.

Aims

The aims of the Equality and Community Cohesion Strategy 2017-21 are to:

- bridge the gap between the levels of deprivation and prosperity in the borough;
- improve understanding of the borough's diversity and foster better understanding between communities;
- improve understanding of 'hidden' disabilities and the challenges that disabled residents face in all aspects of their lives. We aim to work in a cross-cutting way and take a holistic approach to more effectively address the needs of disabled residents;
- support those who do not usually get involved in decision-making to better understand how they can get involved and get their voices heard;
- support residents to access on-line access services;
- provide services that meet the needs of a changing population
- employ staff that reflect the borough's diversity.

Equality objectives

1. To ensure key plans and strategies narrow the gap between different communities in the borough;
2. To Improve equality of access to services for disadvantaged groups;
3. Ensure regeneration plans increase the opportunity for all Merton's residents to fulfil their educational, health and economic potential, participate in the renewal of the borough and create a health promoting environment;
4. Encourage recruitment from all sections of the community , actively promote staff development and career progression opportunities and embed equalities across the organisation;
5. Promoting a safe, healthy and cohesive borough where communities get on well together
6. Fulfil our statutory duties and ensure protected groups are effectively engaged when we change our services.

LB Sutton's Equality & Diversity Framework 2019-20 to 2023-24

1.31 Sutton's Equality and Diversity Framework sets out the Council's commitment and approach to eliminating unlawful discrimination, harassment and victimization, advancing equality of opportunity, and fostering good relations within the borough Sutton from 2019-20 to 2023-24.

1.32 It sets out the following Core Objectives:

Objective 1

Encourage tolerance, mutual understanding and respect between all community members and interest groups, including people with a disability, newly-arrived migrants, asylum seekers and refugees, gypsies and travellers, people of different ethnicities and race, people of different faiths, gender identity and sexual orientation.

Objective 2

Target and challenge social isolation, particularly that experienced by people with a disability, Black Asian and Minority Ethnic (BAME) individuals, and older people at risk of isolation or with long-term conditions.

Objective 3

Strengthen the Council's approach to engaging with residents and community groups so that they feel they have a say in the services the Council delivers, particularly people with a disability and faith and BAME groups. This includes maximising the use of existing Council mechanisms, such as borough consultations, Local Committees and external ones such as the Fairness Commission.

Objective 4

Empower equality and diversity organisations, the voluntary sector, local businesses and residents by monitoring and publishing equality and diversity information and outcomes so that they can understand the reasons for Council decisions and challenge any decisions that they believe are unjustified.

2. Equalities Target Groups in South London

Equalities target groups

2.1 Table 2.1 identifies the range of equality target groups considered as part of this EqIA report.

Table 2.1: Equalities Target Groups

Equality Target Group	Equality Target Strand
Women	Sex
Black and minority ethnic (BME) people	Race
Older people	Age
Young people and children	Age
Disabled people	Disability
Lesbians, gays, bisexuals and transgendered	Sexuality
Different faith groups	Faith
People affected by social deprivation	Social Deprivation

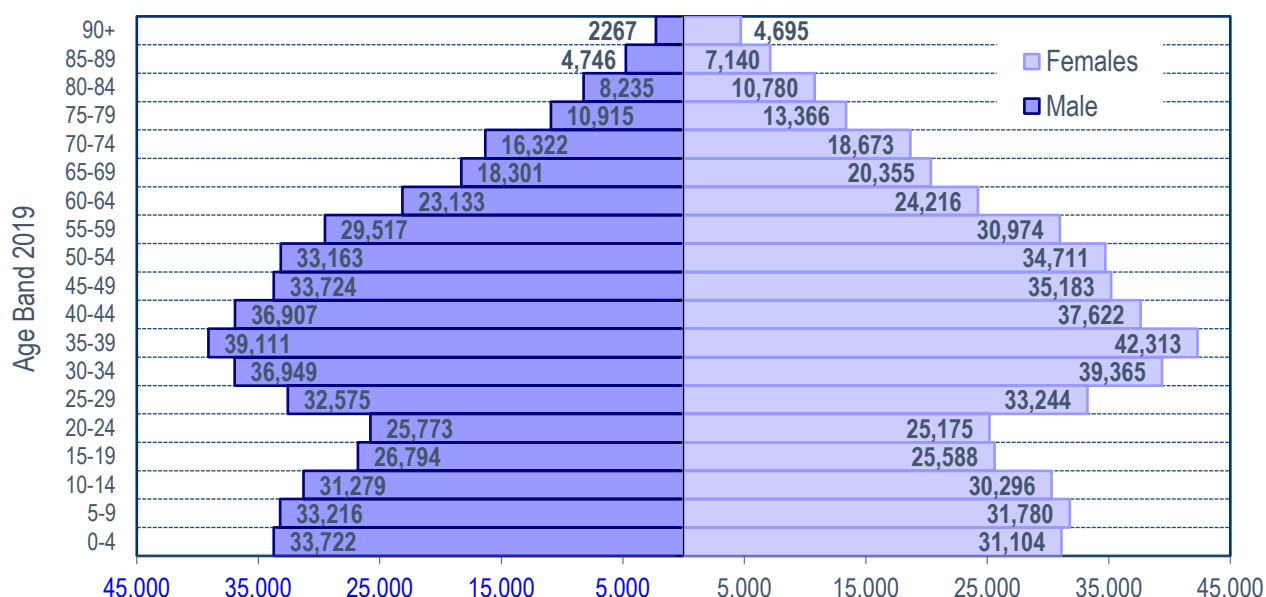
Women, older people, young people and children

Table 2.2: Population structure for SLWP boroughs and plan area 2019

Resident Population 2019				
	Age band	Males	Females	All persons
Croydon	Borough residents aged 0-15	42,104 (22.6%)	40,478 (20.5%)	82,582 (21.5%)
	Borough residents aged 16-64	120,450 (64.6%)	127,654 (64.7%)	248,104 (64.6%)
	Borough residents aged 65+	23,865 (12.8%)	29,287 (14.8%)	53,152 (13.9%)
	Total	186,419	197,419	383,838
	Age band	Males	Females	All persons
Kingston	Borough residents aged 0-15	16,801 (19.4%)	16,488 (18.6%)	33,289 (19%)
	Borough residents aged 16-64	58,605 (67.8%)	58,416 (66%)	117,021 (66.9%)
	Borough residents aged 65+	11,099 (12.8%)	13,571 (15.4%)	24,670 (14.1%)
	Total	86,505	88,475	174,980
	Age band	Males	Females	All persons
Merton	Borough residents aged 0-15	23,074 (23.8%)	21,844 (20.5%)	44,918 (22.1%)
	Borough residents aged 16-64	62,029 (64.1%)	70,046 (65.8%)	132,075 (65%)
	Borough residents aged 65+	11,739 (12.1%)	14,595 (13.7%)	26,334 (12.9%)
	Total	96,842	106,485	203,327
	Age band	Males	Females	All persons
Sutton	Borough residents aged 0-15	21,983 (22%)	20,688 (19.7%)	42,671 (20.8%)
	Borough residents aged 16-64	63,817 (63.9%)	66,668 (63.6%)	130,485 (63.7%)
	Borough residents aged 65+	14,084 (14.1%)	17,535 (16.7%)	31,619 (15.5%)
	Total	99,884	104,891	204,775
	Age band	Males	Females	All persons
SLWP area	Residents aged 0-15	103,962 (22.2%)	99,498 (20%)	203,460 (21%)
	Residents aged 16-64	304,901 (64.9%)	322,784 (65%)	627,685 (65%)
	Residents aged 65+	60,787 (12.9%)	74,988 (15%)	135,775 (14%)
	Total	469,650	497,270	966,920

Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Figure 2.1: Population structure by sex and age band for the plan area 2019



Source: GLA 2018-based Housing Led Projections (updated Feb 2020)

Disabled people

Table 2.3: Incapacity benefit claimants for SLWP boroughs and plan area 2019

	Numbers	Percentage aged 16-64
Croydon	280	0.11%
Kingston	80	0.07%
Merton	110	0.08%
Sutton	120	0.09%
SLWP	590	0.09%
London	6,980	0.12%

Source: Incapacity Benefit or Severe Disablement allowance claimants (DWP, 2019)

Black and minority ethnic (BME) people

Table 2.4: Ethnic breakdown for SLWP boroughs and plan area 2019

	White	Black and Minority Ethnic (BAME)	Asian or Mixed Race	Black or Mixed Race	Other	Chinese
Croydon	188,737 (47.6%)	207,812 (52.4%)	76,805 (19.4%)	109,216 (27.5%)	16,762 (4.2%)	5,029 (1.3%)
Kingston	121,925 (67.5%)	58,673 (32.5%)	36,758 (20.4%)	8,292 (4.6%)	9,520 (5.3%)	4,104 (2.3%)
Merton	133,098 (63.2%)	77,354 (36.8%)	42,749 (20.3%)	24,124 (11.5%)	7,561 (3.6%)	2,920 (1.4%)
Sutton	153,461 (73.2%)	56,206 (26.8%)	31,975 (15.3%)	15,833 (7.6%)	5,686 (2.7%)	2,711 (1.3%)
SLWP	597,221 (59.9%)	400,045 (40.1%)	188,287 (18.9%)	157,465 (15.8%)	39,529 (4.0%)	14,764 (1.5%)
London	5,161,532 (56.7%)	3,944,624 (43.3%)	1,819,907 (20.0%)	1,442,062 (15.8%)	526,430 (5.8%)	156,224 (1.7%)

Source: GLA Housing-led Ethnic Projections (November 2017)

Faith groups

Table 2.5: Religion for SLWP boroughs and plan area 2019

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion
Croydon	49.3%	-	5.5%	-	8.8%	-	2.8%	33.6%
Kingston	41.9%	1.3%	6.1%	-	11.0%	-	2.2%	37.6%
Merton	51.7%	-	5.3%	-	6.1%	-	3.5%	33.3%
Sutton	48.8%	-	8.2%	-	7.3%	-	2.1%	33.6%
SLWP	48.4%	0.2%	6.2%	0.0%	8.3%	0.0%	2.7%	34.3%
London	44.5%	0.9%	5.2%	2.2%	14.2%	1.4%	2.3%	29.4%

Source: GLA Data store – Annual Population Survey (June 2019)

Social deprivation

Table 2.6: Index of Multiple Deprivation (IMD 2019) - national ranking and change since 2015

	Social deprivation ranking compared to the 317 areas in England ⁷		
	IMD 2015 ⁸	IMD 2019	Change 2015-19
Croydon	95 th	108 th most deprived in England	↓
Kingston	270 th	273 rd most deprived in England	↓
Merton	209 th	213 th most deprived in England	↓
Sutton	211 th	226 th most deprived in England	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 2.7: Index of Multiple Deprivation (IMD 2019) - London ranking and change since 2015

	Social deprivation ranking compared to the 33 London Boroughs		
	IMD 2015	IMD 2019	Change 2015-19
Croydon	17 th	15 th most deprived in London	↑
Kingston	32 nd	32 nd most deprived in London	No change
Merton	28 th	29 th most deprived in London	↓
Sutton	29 th	31 st most deprived in London	↓

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

Table 2.8: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England

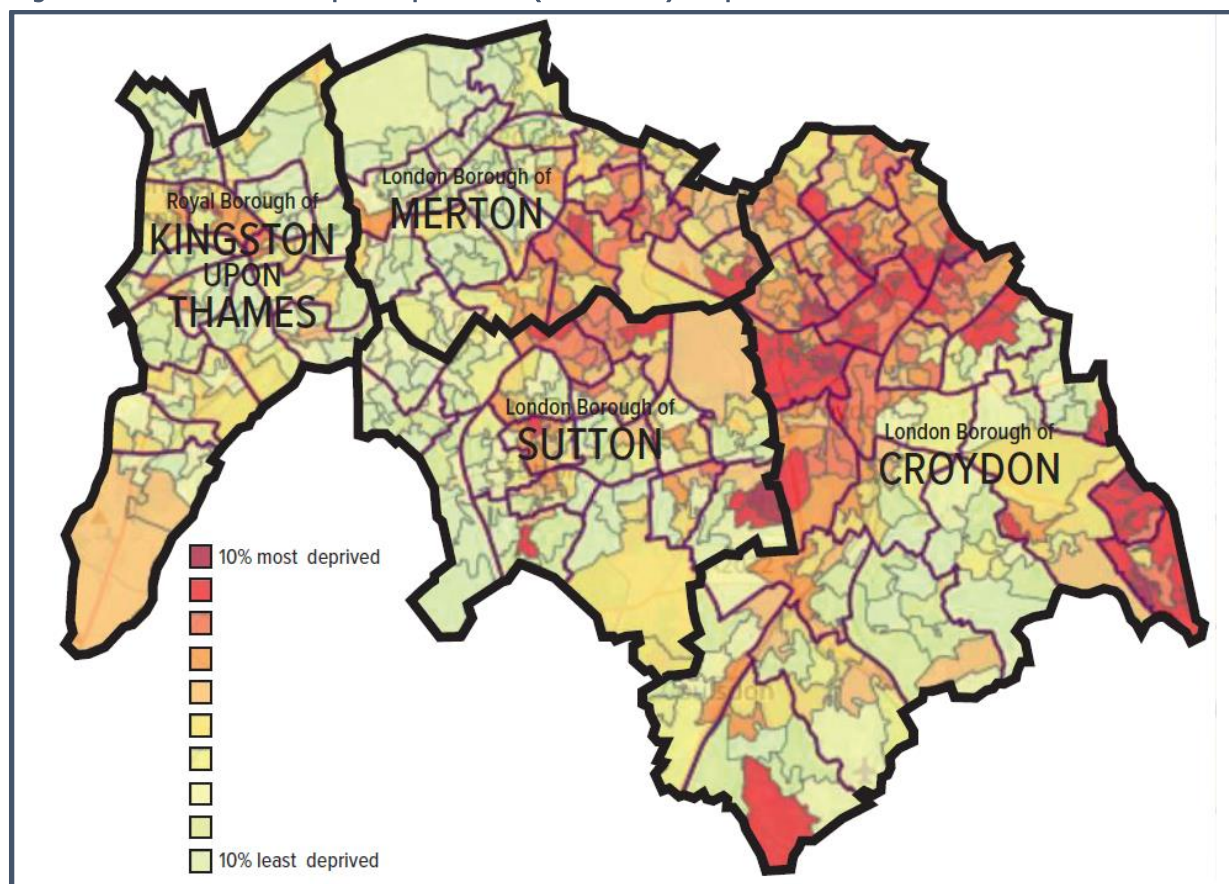
	IMD 2019 – Ranking of average score			
	LSOAs ranked in 10% most deprived	LSOAs ranked in 20% most deprived	LSOAs ranked in 10% least deprived	LSOAs ranked in 20% least deprived
Croydon	5	44	7	19
Kingston	0	1	13	38
Merton	0	3	22	41
Sutton	1	7	23	42

Source: Index of Multiple Deprivation (IMD), Department for Communities and Local Government (CLG) 2019

⁷ based on IMD 2019 'rank of average score' (1st = most deprived and 317th = least deprived)

⁸ 2015 data recast to 2019 lower tier (district) authorities following boundary changes

Figure 2.2: Index of Multiple Deprivation (IMD 2015) map for SLWP area⁹



⁹ showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)

3. Equalities Impact Assessment

EqIA criteria

3.1 Table 3.1 sets out the EqIA criteria as the basis for assessing the potential impacts of emerging South London Waste Plan (SLWP) policies upon each equality target group.

Table 3.1 EqIA criteria

EqIA Criteria
<i>Will the policy or proposal have beneficial or adverse impacts for women?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for black and minority ethnic (BAME) groups or faith groups?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for older people?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for young people and children?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for disabled people and people with a limiting long-term illness?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for lesbians, gays, bisexuals and/or transgendered people (LGTB groups)?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for people affected by social deprivation?</i>
<i>Will the policy or proposal have beneficial or adverse impacts for gypsies and/or travellers?</i>

EqIA Matrix and Scoring system

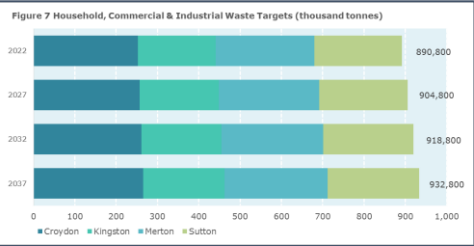
3.2 The outcome off EqIA Screening in relation to each of the proposed waste policies WP1-WP10 set out in the draft SLWP Submission Version are presented in the Screening Matrix below. As before, the extent of the likely beneficial or adverse impacts on each target equality group is recorded in the matrix using the symbols shown in Table 4.2.

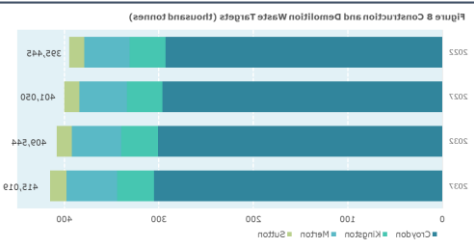
Table 4.2: Scoring system for use in EqIA screening

Symbol	Scale of effect
++	Larger beneficial impact
+	Smaller beneficial impact
-	Neutral or no impact
X	Smaller negative impact
XX	Large negative effect.
?	Uncertain impact and/or the nature and magnitude of the impact is subject to the implementation of other planning policies.

EqIA MATRIX: IMPACTS OF PROPOSED SLWP MODIFICATIONS ON EQUALITY GROUPS

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
THE SOUTH LONDON WASTE PLAN – WHAT IT IS								
<p>MODIFICATION 1.1 (Post EIP) Para 1.1 First Sentence – page 1 Amend as follows: "The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 <u>2022</u> to 2036 <u>2037</u>."</p> <p>Purpose: To ensure consistency with the NPPF requirement for a 15-year plan period from adoption</p>	No significant impacts							
<p>MODIFICATION 1 (Post EIP) After Para 1.3 – page 1 Insert: "Community involvement in local planning matters is an essential part of the planning process. Each of the South London Waste Plan Boroughs has an adopted Statement of Community involvement (SCI), a document which aims to ensure that all sections of the community understand how they are able to contribute to the planning process. When planning applications are submitted to the Boroughs, including applications involving waste uses, community involvement will be sought in accordance with the relevant Boroughs' SCI."</p> <p>Purpose: • To clarify how communities will be involved in future planning applications.</p>	++	++	++	++	++	++	++	++
<p>COMMENTARY Modifuication 1 will have large beneficial impacts on women; BME/faith groups; older people; young people, disabled people; people with a limiting long-term illness, LGTB people and Gypsies & Travellers and people affected by deprivation by ensuring that:</p> <ul style="list-style-type: none">• all sections of the community across the four boroughs, including all equalities target groups, understand how they are able to contribute to the planning process;• when waste planning applications are submitted to the Boroughs, including applications involving waste uses, community involvement will be sought in accordance with the relevant Boroughs' SCI								
<p>MODIFICATION 2 Para 2.1 Final Sentence – page 3 Amend as follows: "This South London Waste Plan is the replacement document and covers the period 2021 <u>2022</u> to 2036 <u>2037</u> and supersedes the 2012 South London Waste Plan. A list of superseded policies is set out in Appendix 5".</p> <p>Purpose: • To ensure the Plan period is a minimum of 15 years from adoption. • To make it clear that the 2012 South London Waste Plan and its Policies is superseded in full. To address Inspector's Preliminary Matter INSP01. Previously Mod 1.</p>	No significant impacts – factual change							
<p>MODIFICATION 3 Para 2.11 First Sentence – page 5 Amend third bullet as follows: 95% of construction, demolition and excavation waste to be recycled by 2020 <u>of excavation material to go to beneficial use and 95% of construction and demolition waste for reuse, recycling or recovery. Beneficial use could include using excavated material within the development, or in habitat creation, flood defences, climate change adaption/mitigation or landfill restoration.</u></p> <p>Purpose: • To improve clarity and to ensure SLWP wording is consistent with the 2021 London Plan and NPPF • Inspector's Question M3 [iv] 9. • Previously Mod 1.1.</p>	No significant impacts – factual change							

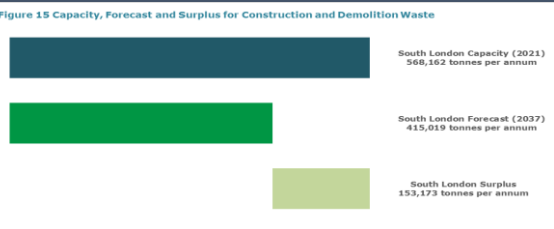
	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
KEY ISSUES								
MODIFICATION 4 Para 3.8 First Sentence – page 10 Amend as follows: "The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. <u>Similarly, HCI waste sent to the Redhill Landfill site is due to be managed in Beddington, following the planned closure of the landfill in 2027.</u> Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes. <u>However, the Plan identifies sufficient capacity within the plan area to exceed arisings for construction and demolition waste. The Boroughs will continue to monitor cross-boundary movements of waste through the duty to cooperate."</u> Purpose: <ul style="list-style-type: none">To improve clarity on cross-boundary movements of waste and ongoing duty-to-cooperate.Inspector’s Question M3 (iv) 7.Previously Mod 1.2.	No significant impacts – factual change							
MODIFICATION 5 Para 3.11 - page 12 Amend as follows: The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities <u>outside the South London waste plan area</u> which receive South London waste are able to do so in the future. <u>No planning issues have been identified which will prevent the continued cross-boundary movements of waste</u> and the achievement of this task can be seen in the Statements of Cooperation which accompany this plan. <u>The Boroughs will continue to monitor cross-boundary movements of waste and engage with relevant authorities through the duty to cooperate, so any substantial changes can be considered in accordance with Appendix 1 'Monitoring'.</u> Purpose: <ul style="list-style-type: none">Duty to CooperateInspector’s Question M3 (i) 5.Previously Mod 1.3			++	++	++			++
COMMENTARY Proposed Modification 5 will have potential beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by: <ul style="list-style-type: none">emphasising the SLWP boroughs’ shared commitment to monitor cross-boundary waste movements over the period of the plan;where plan monitoring identifies that policy objectives and targets for minimising air pollution in close proximity to operational waste sites; promoting net self-sufficiency; promoting an environmentally sustainable strategic approach to managing South London’s waste arisings; promoting waste re-use, recycling and recovery; securing the transition to a circular economy are not being achieved, undertaking the relevant ‘Management Actions’ set out in Appendix 1 to the SLWP on ‘Monitoring and Contingencies’ (as amended) The increased focus on plan monitoring and undertaking appropriate management actions to secure sustainable waste planning objectives will have both short and long-term benefits for the above equality groups. For example it is well established that older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts. There will be less significant benefits for Women; BME/Faith groups; LGBT people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.								
MODIFICATION 5.1 (Post EIP) Figure 7 - page 13 Replace Figure 7 with the updated version as follows:  <ul style="list-style-type: none">Purpose: To ensure figures covered a 15-year Plan period from adoption, as required by the NPPF.	No significant impacts – factual change							

		IMPACTS ON EQUALITY TARGET GROUPS							
		Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 6 Para 3.16 First Sentence – page 14 <i>"The London Plan sets a target that <u>in London 95% of excavation waste will go to beneficial use and</u> recycle and reuse <u>95% of construction and demolition waste will be reused, recycled or recovered</u> 95% of Construction and Demolition Waste by 2020."</i>		No significant impacts – factual change							
<ul style="list-style-type: none">Previously Mod 1.4.Purpose: To improve clarity and to ensure the wording in the SLWP is consistent with the 2021 London Plan and NPP									
MODIFICATION 6.1 (Post EIP) Figure 8 – page 14 Update Figure 8 as follows:		No significant impacts – factual change							
									
<ul style="list-style-type: none">Purpose: To ensue figures covered a 15-year Plan period from adoption, as required by the NPPF .									
VISION AND OBJECTIVES									
MODIFICATION 7A Para 4.2 – page 19 Amend as follows: <i>"To achieve the vision, the South London Waste Plan has the following objectives, <u>which will be delivered through the policies in the Plan:....</u>"</i>		No significant impacts – for clarity							
<ul style="list-style-type: none">Purpose: For clarityPreviously Mod 1.4									
MODIFICATION 7B Para 4.2 – page 19 Amend as follows: <i>"Objective 1: <u>To plan for net self-sufficiently by</u> Meet the 2019 ItP London Plan <u>meeting the 2021 London Plan target for Household and Commercial and industrial waste.</u></i> <i><u>To be delivered through Policies WPAGE 1, WP3 and WP4.</u>"</i>				++	++	++			++
<ul style="list-style-type: none">Purpose: To incorporate the core aim of net self-sufficiencyInspector’s Question M3 (i) 9.Previously Mod 1.5 pt (a).									
COMMENTARY Proposed Modification 7B will have some potential beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by incorporating the core sustainable waste management aims of achieving net self-sufficiency and meeting the London Plan 2021 combined apportionment targets within the plan area as part of the wording of Objective 1, Assuming that Objhective 1 is delivered as part of an environmentally sustainable strategic approach to managing South London’s waste arisings over the plan period, achieving net self-sufficiency and meeting the combined apportionment will serve to minimise cross-boundary waste movements over the period of the plan and local pollution artising from additional waste-related HGV movements that would otherwise occur The above equalities target groups are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. There will be less clear benefits for women; BME/Faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.									

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<p>MODIFICATION 7C Para 4.2 – page 19 Amend as follows:</p> <p><i>"Objective 2: <u>To plan for net self-sufficiently by meeting</u> Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural, where practical or necessary.</i> <u>To be delivered through Policies WP2, WP3 and WP4.</u>"</p> <p>• Purpose: Inspector’s Question M3 (i) 9. • Previously Mod 1.5.</p>			++	++	++			++
<p>COMMENTARY Proposed Modification 7C will have beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by incorporating the core aim of achieving net self sufficiency as part of the wording of Objective 2,together with meeting the combined apportionment targets for the management of Household and Commercial and Industrial (HCI) waste and for other forms of waste including Construction and Demolition (C&D), excavation, low level radioactive and agricultural waste.</p> <p>Assuming that Objhective 2 is delivered as part of an environmentally sustainable strategic approach to managing South London’s waste arisings over the plan period, achieving net self-sufficiency and meeting the combined apportionment will serve to minimise cross-boundary waste movements over the period of the plan and local pollution artising from additional waste-related HGV movements that would otherwise occur. It will also bring some benefits for the competitiveness of the waste section within south London.</p> <p>The above equalities target groups are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas.</p> <p>There will be less clear benefits for women; BME/Faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</p>								
<p>MODIFICATION 7D Para 4.2 – page 19 Amend as follows:</p> <p><i>"Objective 3: Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan.</i> • <u>To be delivered through Policies WP3 and WP4.</u>"</p> <p>• Purpose: For clarity. • Inspector’s Question M3 (i) 9. • Previously Mod 1.5b</p>	<p>No significant impacts – while the proposed modifications to Objectives 3, 5 and 6 help to identify the relevant policies, they do not have a material effect in terms of the likely impacts of the draft plan</p>							
<p>MODIFICATION 7E Para 4.2 – page 19 Amend:</p> <p><i>Objective 4: Ensure there is <u>Support the need for</u> sufficient land for other industrial uses within the South London Waste Plan area’s industrial estates <u>by not safeguarding more land for waste management than is required.</u></i> <u>To be delivered through Policies WPAGE 1, WP2, WP3 and WP4.</u></p> <p>• Inspector’s Question M3 (i) 9. • Previously Mod 1.5c.</p>								++
<p>COMMENTARY Proposed Modification 7E will have some potential beneficial impacts on people affected by social deprivation across the four boroughs by supporting the need for sufficient land for other employment generating industrial uses within strategic industrial locations (SILs) and locally significant industrial locations (LSILS) and by not safeguarding more land for waste management than is required. Provided that Objective 4 is delivered and monitored as part of an environmentally sustainable strategic approach to managing South London’s waste arisings, this will help to address social deprivation by promoting local employment opportunities and South London’s economy.</p> <p>Impacts on other equalities groups, including older people; young people, people with a limiting long-term illness;women; BME/Faith groups; LGTB people and gypsies & travellers will be broadly in line with those experienced by the wider community.</p>								
<p>MODIFICATION 7G Para 4.2 – page 19</p> <p><i>"Objective 6: <u>Ensure the effects of new development are mitigated and, where possible, enhance amenity.</u></i> • <u>To be delivered through Policies WP4, WP5, WP6, WP8 and WP9</u>"</p> <p>• Purpose: For clarity. • Inspector’s Question M3 (i) 9. • Previously Mod 1.5b</p>	<p>No significant impacts – while the proposed modifications to Objectives 3, 5 and 6 help to identify the relevant policies, they do not have a material effect in terms of the likely impacts of the draft plan</p>							

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 7H Para 4.2 – page 19 Amend as follows: <i>"Objective 7: To support the movement of waste as far up the waste hierarchy as practicable. To be delivered through Policies WP3 and WP7"</i>			++	++	++			++
<ul style="list-style-type: none">• Purpose: New objective supprrting movement of waste as high up the waste hierarchy as possible• Inspector’s Question M3 (i) 9.• Previously Mod 1.5 (d)								
COMMENTARY Proposed Modification 7H will have beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affectred by social deprivation by adding a new Objective supporting the movement of waste as far up the waste hierarchy as practicable. Provided that the sustainable waste management principles underlying this new objective are applied on a consistent basis over the plan period, the shift towards waste minimisation, preparing for re-use, recycling and recovery will not only improve resource efficiency and innovation to keep products and materials at their highest use for as long as possible as part of a circular economy, but significantly reduce HGV movements and pollution from waste operations The above equalities target groups are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. There will be less clear benefits for women; BME/Faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.								
MODIFICATION 7I Para 4.2 – page 19 Amend as follows: <i>"Objective 8: To deliver waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy. To be delivered through Policies WPAGE 1, WP2, WP3, WP4, WP5 and WP7"</i>			++	++	++			++
<ul style="list-style-type: none">• Purpose: New objective aimed at applying the proximity principle, supporting co-location and promoting the Ciurcular Economy• Inspector’s Question M3 (i) 9./ Previously Mod 1.5e.								
COMMENTARY Proposed Modification 8 will have beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by adding a new Objective for the purpose of delivering waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy.Provided that the sustainable waste management principles underlying this new objective, namely supporting the proximity principle, the co-location of facilities and the circular economy, are applied effectively over the plan period, this will not only significantly reduce HGV movements and pollution from waste operations but also help to make the most efficient use of industrial land across the plan area. People affected by social and economic deprivation may also benefit from increased employment opportunities as a resut of not safeguarding more land for waste management than is required. The above equalities target groups are expected to benefit since they are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from waste-related HGV movements. There will be less clear benefits for women; BME/Faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.								
MODIFICATION 7J Para 4.2 – page 19 Amend: <i>"Objective 9: To ensure the delivery of sustainable waste development within South London through the integration of social, environmental and economic considerations. To be delivered through Policies WPAGE 1 to WP9"</i>								
<ul style="list-style-type: none">• Purpose: New objective aimed at integrating the full range of social, environmental and economic considerations in delivering sustainable waste development in South London.• Inspector’s Question M3 (i) 9/ Previously Mod 1.5e.								
Proposed Modifuication 7J will have potential beneficial impacts for all equalities target groups included within the scope of this EqIA - women; BME/faith groups; older people; young people, disabled people; people with a limiting long-term illness, LGTB people and Gypsies & Travellers and people affected by deprivation - by introdiucing a new plan objective aimed at integrating the full range of social, environmental and economic considerations in delivering sustainable waste development in South London Provided that Objective 9 is implemented and monitored effectively, so that it informs the development management process and planning decisions on proposed waste developments, it will have benefits for the full range of social, environmental and economic considerations including promoting net self-sufficiency within South London; promoting an environmentally sustainable strategic approach to waste management; promoting waste re-use, recycling and recovery; helping to secure the circular economy; addressing the causes and impacts of climate change; reducing flood risk; promoting sustainable design; delivering sustainable transport; reducing air pollution; minimising construction impacts; protecting biodiversity; promoting local employment; minimising air pollution; minimising impacrs on human health and the open environment; and promoting equalities, accessibility and social inclusion.								

					IMPACTS ON EQUALITY TARGET GROUPS																																									
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MODIFICATION 7.1 (Post EIP) Figure 11 – page 22 Update Figure 11 Arisings and Apportionment at 2022 and 2037as follows: <table><tr><th>Borough</th><th>2022</th><th>2037</th><th></th><th></th></tr><tr><td></td><td>Arisings</td><td>Apportionment</td><td>Arisings</td><td>Apportionment</td></tr><tr><td>Croydon</td><td>306,100</td><td>252,800</td><td>322,600</td><td>264,800</td></tr><tr><td>Kingston</td><td>152,400</td><td>187,600</td><td>158,400</td><td>196,600</td></tr><tr><td>Merton</td><td>174,500</td><td>238,750</td><td>182,000</td><td>250,000</td></tr><tr><td>Sutton</td><td>161,550</td><td>211,650</td><td>169,800</td><td>221,400</td></tr><tr><td>Total</td><td>794,550</td><td>890,800</td><td>832,800</td><td>932,800</td></tr></table>					Borough	2022	2037				Arisings	Apportionment	Arisings	Apportionment	Croydon	306,100	252,800	322,600	264,800	Kingston	152,400	187,600	158,400	196,600	Merton	174,500	238,750	182,000	250,000	Sutton	161,550	211,650	169,800	221,400	Total	794,550	890,800	832,800	932,800	No significant impacts – factual change						
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• Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP																																														
WP1 STRATEGIC APPROACH TO HOUSEHOLD AND COMMERCIAL AND INDUSTRIAL WASTE																																														
MODIFICATION 8 (Post EIP) Figure 13 – page 23 Replace Figure 13 with the updated version:					No significant impacts – factual change																																									
• Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP																																														
MODIFICATION 9 (Post EIP) Para 4.2 – page 19 Amend as follows: <i>"As such, the boroughs will not normally support new waste sites coming forward (outside of sites providing compensatory provision, as set out in Policy WP3), unless there are exceptional circumstances that justify it. This strikes a balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses, whilst giving some flexibility for new waste sites to be delivered in appropriate circumstances.</i> <i>Applications outside of safeguarded waste sites will not be supported unless it can be demonstrate that there is a need for such a facility, having regard to the latest Waste Authority Monitoring Report and the ability of the Plan to meet the London Plan apportionment figure. In addition, applicants will need to provide evidence as to why it is not possible to use, expand or intensify an existing safeguarded waste site (as set out on pages 44-91 of this Plan).</i> <i>Furthermore, applications proposing waste facilities outside of the existing safeguarded sites will not be supported unless it can be demonstrated that the proposed site would be better suited to meeting the identified need for South London having regard to delivering the vision and objectives of the South London Waste Plan. For example, there may be an opportunity to co-locate a recycling facility with a reprocessing plant or an opportunity for small scale expansion of an existing site onto adjacent land which helps facilitate the maximum use of an existing waste site and enable co-location of facilities.</i> <i>There may be instances in the future where advances in waste technologies are such that existing sites do not meet the technical requirements of a proposed waste management facility, for example, the identified locations might be too small for the proposed development or the facility may need to be located near a specific waste producer. In any event, a new waste site will have to satisfy the locational criteria set out in Policy WP4 (b) to (g). The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."</i>							++	++	++			++																																		
• Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective																																														
COMMENTARY Proposed Modification 9 will have beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by confirming that the SLWP will not normally support new waste sites coming forward unless (i) it is for compensatory provision under Policy WP3 (ii) it can be demonstrated that there is a need; (iii) it can be demonstrated that it is not possible to use, expand or intensify an existing safeguarded waste site; or (iv) it can be demonstrated that the proposed site would be better suited to delivering the vision and objectives of the plan Ptomoting the most efficient use of employmentl land for sustainable waste management practices, for example through intensification of existing safeguarded sites and/or co-location in line with circular economy principles rather than developing waste facilities on other industrial sites which are capable of accommodating other employment generating uses, will both help to minimise waste related HGV movements and pollution from waste sites across the plan area and avoid the unnecessary loss of induistrial land outside of safeguarded sites which may have the potential to accommodate othed employment generating uses. This will optimise the provision of waste management facilities across the plan area, avoid the development of additional waste facilities that are not needed to meet the apportionment, promote the circular economy and strike a sustainable balance between meeting the apportionment, achieving net self-sufficiency and not stifling industrial land uses The above equalities target groups are expected to benefit since they are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from waste-related HGV movements. People affected by social and economic deprivation may also benefit from increased employment opportunities as a resut of not safeguarding more land for waste management than is required There will be less clear benefits for women; BME/Faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.																																														

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	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation																		
<p>MODIFICATION 10 (Post EiP) Policy WP1 – page 23 Amend Policy WP1 as follows</p> <p><i>"WP1 Strategic Approach to Household and Commercial and Industrial Waste</i> <i>The boroughs.....</i> <i>.....the SLWP will seek to meet the 2019 ItP 2021 London Plan apportionment target ...to 2036 2037</i> <i>New waste sites (either for transfer or management) will not normally be permitted, unless: they are for compensatory provision (see WP3).</i> <i>(i) they are for compensatory provision (in accordance with Policy WP4); or</i> <i>(i) there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London;</i> <i>and</i> <i>(ii) there is robust evidence that existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and</i> <i>(iii) they would manage waste as high up the waste hierarchy as practicable; and</i> <i>(iv) they would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough’s Development Plan</i></p> <p>• Purpose: To ensure the policy is consistent with national policy and is justified and positively prepared.</p>			++	++	++			++																		
<p>COMMENTARY Proposed Modification 10 is expected to have potential beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by optimising the provision of waste management facilities across the plan area, avoiding the development of additional travel-generating facilities for HC&I waste outside of safeguarded sites that are not needed to meet the apportionment, promoting co-location and ensuring gthat any bnw waste sitesmanage waste as high up the waste hierarchy as practicable. All of these policy measures will serve to minimise additional waste-related HGV movements across the plan area and other potentiallyt adverse impacts arising from the operation of waste sites Minimising waste-related HGV movements, promoting co-location and managing waste as high up the waste hierarchy as possible will have both short and long-term benefits for the above equalities groups. It well established that older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts.</p> <p>There will be less significant benefits for Women; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.</p>																										
<p>WP2 STRATEGIC APPROACH TO OTHER FORMS OF WASTE</p>																										
<p>MODIFICATION 10.1 (Post EiP) Figure 14 – page 24 Updte Figure 14 as follows:</p> <table><tr><th><i>Borough</i></th><th><i>2022 Arisings</i></th><th><i>2037 Arisings</i></th></tr><tr><td><i>Croydon</i></td><td><i>293,381</i></td><td><i>305,058</i></td></tr><tr><td><i>Kingston</i></td><td><i>37,966</i></td><td><i>39,040</i></td></tr><tr><td><i>Merton</i></td><td><i>48,391</i></td><td><i>54,314</i></td></tr><tr><td><i>Sutton</i></td><td><i>15,707</i></td><td><i>16,607</i></td></tr><tr><td><i>Total</i></td><td><i>395,445</i></td><td><i>415,019</i></td></tr></table> <p>• Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP</p>	<i>Borough</i>	<i>2022 Arisings</i>	<i>2037 Arisings</i>	<i>Croydon</i>	<i>293,381</i>	<i>305,058</i>	<i>Kingston</i>	<i>37,966</i>	<i>39,040</i>	<i>Merton</i>	<i>48,391</i>	<i>54,314</i>	<i>Sutton</i>	<i>15,707</i>	<i>16,607</i>	<i>Total</i>	<i>395,445</i>	<i>415,019</i>	<p>No significant impacts – factual change</p>							
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<p>MODIFICATION 11 Figure 15 – page 24</p> <div><p>Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste</p><table><tr><td>South London Capacity (2021)</td><td>568,162 tonnes per annum</td></tr><tr><td>South London Forecast (2037)</td><td>415,019 tonnes per annum</td></tr><tr><td>South London Surplus</td><td>153,173 tonnes per annum</td></tr></table></div> <p>• Purpose: To ensure figures cover 15-year period from adoption, as required by the NPPF and to ensure consistency within the SLWP.</p>	South London Capacity (2021)	568,162 tonnes per annum	South London Forecast (2037)	415,019 tonnes per annum	South London Surplus	153,173 tonnes per annum	<p>No significant impacts – factual change</p>																			
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	IMPACTS ON EQUALITY TARGET GROUPS																									
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation																		
MODIFICATION 12 (Post EIP) Para 5.17 after last sentence – p26 <i>"As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify it, as set out in Policy WP2 (e)."</i>			+	+	+																					
<ul style="list-style-type: none">Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective.																										
COMMENTARY While Proposed Modification 12 may have some potential beneficial impacts on older people; young people; disabled people; and people with a limiting long-term illness by minimising additional waste-related HGV movements across the plan area that would otherwise occur tio serve new waste sites and/or additional capacity to manage low level radioactivewaste, any beneficial impacts are likely to be almost negligible due to the relatively small tonnages of waste involved.																										
MODIFICATION 13 (Post EIP) Para 5.18 after last sentence –p 26 <i>"...Given the relatively small tonnage of this waste, the fact that it can be mixed with C&I Waste and C&D Waste and that it is often dealt with by C&I and C&D waste facilities, there is no need for the SLWP boroughs to provide for this waste stream, <u>unless exceptional circumstances would justify this type of development, as set out in Policy WP2 (e)</u>"</i>			+	+	+																					
<ul style="list-style-type: none">Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective.																										
COMMENTARY While Proposed Modification 13 may have some potential beneficial impacts on older people; young people; disabled people; and people with a limiting long-term illness by minimising additional waste-related HGV movements across the plan area that would otherwise occur tio serve new waste sites and/or additional capacity to manage low level radioactivewaste, any beneficial impacts are likely to be almost negligible due to the relatively small tonnages of waste involved.																										
MODIFICATION 14 (Post EIP) Para 5.19 after last sentence p 26 Add new sentence as follows: <i>"As such, the Boroughs will not normally support new sites coming forward unless there are exceptional circumstances that justify them, as set out in Policy WP2 (d)."</i>			+	+	+																					
<ul style="list-style-type: none">Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy and to ensure the SLWP is justified and effective																										
COMMENTARY While Proposed Modification 14 may have some potential beneficial impacts on older people; young people; disabled people; and people with a limiting long-term illness by minimising additional waste-related HGV movements across the plan area that would otherwise occur tio serve new waste sites and/or additional capacity to manage hazardous waste, any beneficial impacts are likely to be almost negligible due to the relatively small tonnages of waste involved.																										
MODIFICATION 14.1 (Post EIP) Figure 16 – page 27 Replace Figure 16 with the updated version below: Figure 16 Hazardous Waste Arisings at 2022 and 2037 (tpa)	No significant impacts – factual change																									
<table><tr><th>Borough</th><th>2022 Arisings</th><th>2037 Arisings</th></tr><tr><td>Croydon</td><td>9,008</td><td>9,217</td></tr><tr><td>Kingston</td><td>2,404</td><td>2,442</td></tr><tr><td>Merton</td><td>4,591</td><td>4,704</td></tr><tr><td>Sutton</td><td>5,239</td><td>5,328</td></tr><tr><td>Total</td><td>21,242</td><td>21,692</td></tr></table>									Borough	2022 Arisings	2037 Arisings	Croydon	9,008	9,217	Kingston	2,404	2,442	Merton	4,591	4,704	Sutton	5,239	5,328	Total	21,242	21,692
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	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 15 (Post EiP) After Para 5.21 – page 28 Insert new paragraph as follows: <i>"The list of safeguarded waste sites will be reviewed and updated on an annual basis in the Waste Authority Monitoring Report and new sites will be safeguarded for waste uses once operational."</i> <div><div><div><div></div><div>Purpose: To strengthen the clarity of the SLWP with regards to new sites to ensure consistency with the 2021 London Plan and national policy an to ensure the SLWP is justified and effective</div></div></div></div>	-	-	-	-	-	-	-	-
COMMENTARY No significant impacts are identified specifically in relation to equalities trget groups								
MODIFICATION 16 (Post EiP – partly) Policy WP2 – page 28 Amend Policy WP2 as follows: <i>"WP2 Strategic Approach to Other Forms of Waste</i> <i>(a) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 415,019 tpa within their boundaries across the plan period to 2036 2037.</i> <i>(b) New sites (either transfer or management) will not normally be supported for Construction and Demolition Waste, Radioactive Waste, Agricultural Waste and Hazardous Waste, unless:</i> <i>(i) They are for compensatory provision (in accordance with Policy WP4); or</i> <i>(ii) there is an identified need for such a facility within the South London Waste Plan area that cannot be met on a site elsewhere in London; and</i> <i>(iii) there is robust evidence that existing safeguarded sites within the SLWP area are not available or suitable, or that needs cannot be met through the adaption or intensification of existing facilities; and</i> <i>(iv) they would manage waste as high up the waste hierarchy as practicable; and</i> <i>(v) they would accord with all relevant aims and policies of the SLWP (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough’s Development Plan.</i> <i>(Former parts (c) and (d) ‘renumbered’ as parts (d) and (e): Previously Mod 1.6)</i> NOTES <div><div><div><div></div><div>To ensure the policy is consistent with national policy and is justified and positively prepared.</div></div><div><div></div><div>Previously Mod 1.6 (in part)</div></div></div></div>			++	++	++			++
COMMENTARY Proposed Modification 16 is expected to have potential beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by optimising the provision of waste management facilities across the plan area, avoiding the development of additional travel-generating facilities for C&D waste outside of safeguarded sites that are not needed to meet the apportionment, promoting co-location and ensuring gthat any bnw waste sites manage waste as high up the waste hierarchy as practicable . All of these policy measures will serve to minimise additional waste-related HGV movements across the plan area and other potentiallyt adverse impacts arising from the operation of waste sites Minimising waste-related HGV movements, promoting co-location and managing waste as high up the waste hierarchy as possible will have both short and long-term benefits for the above equalities groups. It well established that older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts. There will be less significant benefits for Women; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.								
WP3 SAFEGUARDING OF EXISTING WASTE SITES								
MODIFICATION 17 Para 5.24 – page 29 Amend paragraph as follows: <i>"In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. This includes intensification or redevelopment to provide compensatory provision."</i> <div><div><div><div></div><div>Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered</div></div><div><div></div><div>Inspector’s Question M3 (vi) 11.</div></div><div><div></div><div>Previously Mod 1.7</div></div></div></div>	No significant impacts – This modification has been proposed in order to clarify that the intensification of uses will be allowed not only on safeguarded waste sites, but as part of redevelopment to provide compensatory provision. However this does not constitute a material change in policy.							

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<p>MODIFICATION 18 Para 5.24 – page 29 Amend paragraph as follows:</p> <p><i>"Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the relevant policies in a borough’s Development Plan."</i></p> <ul style="list-style-type: none">• Purpose: Contributes to consistency, clarity and/or correct errors• Inspector’s Question M4 (vii) 1.• Previously Mod 1.8	<p>No significant impacts – This modification has been proposed for purposes of clarity</p>							
<p>MODIFICATION 19 (Post EiP) Para 5.25 Second Sentence and after Para 5.25 – page 29 Add new sentence to end of Para 5.25 and insert new paras as follows:</p> <p><i>"The 2019 ItP 2021 London Plan states "waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed" (paragraph 9.9.2). <u>The Environment Agency’s Waste Data Interrogator should be used when assessing the maximum throughput achieved over the last five years.</u></i></p> <p><i><u>Applicants will need to demonstrate that provision of replacement capacity is secured before permission is granted for a non-waste use. This could be through the intensification of an existing safeguarded waste site or a compensatory site of a suitable size to meet at least the maximum annual throughput, subject to the requirements of Policy WP4. Boroughs will use conditions or legal agreements to satisfy themselves that compensatory capacity will be delivered before a safeguarded waste site is released to another use.</u></i></p> <p><i><u>In accordance with Policy SI 9 of the 2021 London Plan compensatory apacity should be provided within London. If it can be demonstrated that there is sufficient capacity in London to meet London’s apportionment and net self-sufficiency targets, it may be possible to justify the release of waste sites for other uses without the provision of compensatory provision.</u></i></p> <p><i>The evidence base supporting the economic policies in the 2019 ItP 2021 London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses..... ..<u>To help achieve a balance between ensuring there is sufficient waste management capacity in the South London Waste Plan area, whilst not stifling other land uses that are in high demand, compensatory provision from other London Boroughs will not normally be supported, unless the criteria in Policy WP3 can be met.</u>"</i></p> <ul style="list-style-type: none">• Purpose: To ensure the policy is consistent with national policy and is justified and positively prepared.			+	+	+			?
<p>COMMENTARY Proposed Modification 19 will have potential beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by ensuring that waste management replacement capacity is secured before permission is granted for a non-waste use and ensuring that such compensatory provision is normally provided within the plan area . By achieving a balance between having sufficient waste management capacity within the plan area, whilst not stifling other employment-generating uses, this policy measure will both help to minimise additional waste-related HGV movements to more distant compensatory sites outside the SLWP area that would otherwise occur while at the same time avoiding the loss of industrial land and associated employment opportunities outside of safeguarded sites.</p> <p>Minimising waste-related HGV movements will have both short and long-term benefits for the above equalities groups. It well established that older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts. Minimising the loss of employment land to waste uses outside of safeguarded sites will help to address social deprivation by promoting local employment opportunities and South London’s economy.</p> <p>There will be less significant benefits for Women; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.</p>								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<p>MODIFICATION 20 (Post EiP) Policy WP3 – page 30 "WP3 Existing Waste Sites Safeguarding Compensatory Provision <i>(c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis at least meeting the equivalent of maximum achievable throughput of the site being lost. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Waste AMR and the compensatory sites will be safeguarded for waste uses only.</i> <i>(d) Compensatory provision for the loss of a waste site from outside the South London Waste Plan area will not normally be permitted, unless there is robust evidence that:</i> <i>(i) the compensatory provision is required for London to manage its waste sustainably and achieve net self-sufficiency; and</i> <i>(ii) there are no available or suitable sites within the borough or waste planning area where the waste site will be lost; and</i> <i>(iii) existing safeguarded sites within the South London Waste Plan area are not available or suitable or that needs cannot be met through the adaption or intensification of existing facilities; and</i> <i>(iv) it would manage waste as high up the waste hierarchy as practicable; and</i> <i>(v) it would accord with all relevant aims and policies of the South London Waste Plan (particularly the locational criteria set out in Policy WP4 (b) to (e)) and the applicable borough’s Development Plan.</i></p> <p>Safeguarding Waste Hierarchy <i>(e) Applications for non-waste uses on safeguarded waste sites that accord with all relevant aims and policies of the South London Waste Plan and the applicable borough’s Development Plan, would be supported subject to appropriate conditions or legal agreements that ensure continued operational capacity.</i></p> <p><i>(f) Any development on an existing safeguarded waste site, including for compensatory provision, will be required to result in waste being managed at least to the same level in the waste hierarchy”</i></p> <p>• Purpose: To ensure the policy is consistent with national policy and is justified and positively prepared. • Previously Mod 1.9 (part)</p>								
<p>COMMENTARY Proposed Modification 20 will have potential beneficial impacts on older people; young people; disabled people; and people with a limiting long-term illness by discouraging compensatory provision for the loss of a waste site from more distant industrial locations outside the plan area and ensuring that any compensatory sites manage waste as high up the waste hierarchy as practicable.</p> <p>This policy measure will both help to minimise additional waste-related HGV movements to more distant compensatory sites outside the SLWP area that would otherwise occur while at the same time promoting more efficient and less polluting waste management practices higher up the waste hierarchy..</p> <p>Minimising impacts arising from HGV movements and other potential perational impacts from waste siutes will have both short and long-term benefits for the above equalities groups. Older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movement and polluting emissions from waste operations. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts.</p> <p>There will be less significant benefits for Women; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community</p>								
WP4 SITES FOR COMPENSATORY PROVISION								
<p>MODIFICATION 21 (Post EiP) Para 5.28 – page 31 Amend paragraph as follows: <i>"As set out in Policy WP, the The SLWP expects no new sites for waste except where .. required for compensatory provision (or new sites meeting the exceptional circumstances, set out in WPAE 1 and WP2). The location must be carefully considered.”.</i></p>	<p>No significant impacts – For clarity</p>							

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<div><div><div>MODIFICATION 22</div><div>Policy WP4 parts (a) and (b) – p31</div><div>Amend as follows:</div><div>"Policy WP4</div><div>Proposals for new waste sites <u>or development of existing safeguarded sites</u> to provide compensatory provision should:</div><div>(a) Demonstrate that the site is capable of providing sufficient compensatory capacity <u>at least the equivalent of maximum achievable throughput of the site being lost</u>.</div><div>(b) Be Located on sites:</div><div>(i) <u>Safeguarded for waste, including waste transfer stations, or</u> within Strategic Industrial Locations or Locally Significant Industrial Locations; "</div></div><div><div>• Purpose: To strengthen the clarity of the SLWP with regards to how compensatory provision can be delivered and how much, and to ensure consistency with the 2021 London Plan and national policy;</div><div>• Inspector’s Question M2(i) 4;</div><div>• Previously Mods 1.11a and 1.11b</div></div></div>			+	+	+			?
<div><div>COMMENTARY</div><div>Proposed Modification 22 will have potential beneficial impacts on older people; young people; disabled people; and people with a limiting long-term illness by ensuring that proposals for compensatory provision, either on new sites or existing safeguarded sites demonstrate that the site is capable of providing at least the equivalent of maximum achievable throughput of the site being lost. Maintaining self-sufficiency in terms of overall waste management capacity within the SLWP area will help to minimise additional waste-related HGV movements to more distant sites outside the SLWP area that would otherwise occur.</div><div>Minimising impacts arising from HGV movements will have potential benefits for the above equalities groups. Older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movement and polluting emissions from waste operations. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts.</div><div>There will be less significant benefits for Women; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community</div></div>								
<div><div><div>MODIFICATION 23</div><div>Policy WP4 parts (d)(i) & (v) – p31</div><div>"(d) (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or MOL);</div><div>(v) <u>not within the Green Belt or Metropolitan Open Land</u>"</div></div><div><div>• Purpose: clarity and ensure consistency with national policy;</div><div>• Inspector’s Question M4(i) 3;</div><div>• Previously Mods 1.12</div></div></div>	-	-	-	-	-	-	-	-
<div><div>COMMENTARY</div><div>No significant impacts on equalities target groups are identified.</div></div>								
<div><div><div>MODIFICATION 24</div><div>Policy WP4 parts (f) and (h) – page 31</div><div>Amend as follows:</div><div>"(f) <u>result in waste being managed at least to the same level in the waste hierarchy as the site being lost</u>.</div><div>(f) <u>(h) Meet the other policies of the relevant borough’s Development Plan.</u>"</div></div><div><div>• Purpose: To ensure consistency with London Plan policy;</div><div>• in response to Inspector’s Question M2(i); and</div><div>• Previously Mods 1.13</div></div></div>	-	-	-	-	-	-	-	-
<div><div>COMMENTARY</div><div>While Modification 24 is expected to have positive impacts for all equalities target groups within the vicinity of waste sites, these wilkl be no greater or less in magnitude than the positive benefits predicted for the wider population (see SA Addendum Report)</div></div>								
<div><div><div>MODIFICATION 25</div><div>Policy WP4 – page 31</div><div>Consolidated changes to Policy WP4 for reference: (see above)</div></div></div>	See respective appraisal outcomes for Modifications 22, 23 and 24 above							

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
WP5 PROTECTING AND ENHANCING AMENITY								
MODIFICATION 26 Policy WP5 part (a) – page 33 <i>(a) Developments for compensatory or intensified waste facilities should contribute positively to the character and quality of the area and ensure that any potential adverse impacts of the development are designed and managed to mitigate any achieve levels that will not significantly adversely affect are appropriately mitigated.</i>	-	-	-	-	-	-	-	-
<ul style="list-style-type: none">• Purpose: To ensure consistency with national policy;• in response to Inspector’s Question M4(i) 6; and• Previously Mods 1.14								
COMMENTARY While Modification 26 is expected to have positive impacts for all equalities target groups within the vicinity of waste sites, these will be no greater or less in magnitude than the positive benefits predicted for the wider population (see SA Addendum Report)								
MODIFICATION 27 WP5 pts (c)(iii) & (c)(iv) p33 <i>"Policy WP5</i> <i>(c) (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals, and residential areas. Heritage Assets and the need to conserve, and where practicable, enhance those elements which contribute to their significance, including their setting;</i> <i>(iv) sensitive receptors, such as schools, hospitals and residential areas;"</i>	-	-	-	-	-	-	-	-
<ul style="list-style-type: none">• Purpose: To ensure consistency with national policy;• in response to Inspector’s Question M4(i) 5; and• Previously Mods 1.15								
COMMENTARY While Modification 27 is expected to have some positive benefits for all equalities target groups, these will be no greater or less than the positive benefits predicted for the wider population (see SA Addendum Report)								
MODIFICATION 28 Policy WP5 part (c)(v) – page 33 Amend as follows: <i>"Policy WP5</i> <i>(c) (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;</i> <i>(c) (v) Air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances; potential impacts within Air Quality Focus Areas. Air Quality Management Areas and/or the Mayor’s expanded Ultra Low Emission Zone (ULEZ); cumulative impacts with other waste sites; the London Plan requirement for development proposals to be at least ‘Air Quality Neutral’; and the use of design solutions to prevent or minimise increased exposure of people and in particular vulnerable individuals to poor air quality.</i> "			++	++	++			++
<ul style="list-style-type: none">• Purpose: To improve clarity over air quality requirements and ensure consistency with national policy;• Previously Mods 1.16								
COMMENTARY Proposed Modification 28 will have clear beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by taking account of the following in planning decisions: <ul style="list-style-type: none">• air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances;• potential impacts within Air Quality Focus Areas, Air Quality Management Areas and/or the Mayor’s expanded Ultra Low Emission Zone (ULEZ);• cumulative impacts with other waste sites;• the London Plan requirement for development proposals to be at least ‘Air Quality Neutral’; and• the use of design solutions to prevent or minimise increased exposure of people and in particular vulnerable individuals to poor air quality The increased clarity and detail on air quality objectives both in the context of determining planning applications on waste facilities but also in relation to plan monitoring and review is expected to have significant positive impacts benefits for each of the the above equalities groups. Older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. In addition, people affected by social deprivation are more likely to live in close vicinity to waste sites and therefore more likely to be adversely affected by higher levels of air pollution. There will be less significant benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<div><div><div>MODIFICATION 29</div><div>Policy WP5 (vii), (viii) & (ix) – p 33</div><div><i>(vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;</i></div><div><i>(viii) opportunities to minimise ‘waste miles’ and the potential of using sustainable modes of transport for incoming and outgoing materials</i></div><div><i>(viii) (ix) The safety and security of the site.</i></div></div><div><div>• Purpose: To strengthen the links between the Plan policies and the monitoring framework.</div><div>• in response to Inspector’s Question M4(i) 4; and Previously Mods 1.17</div></div></div>	+		++	++	++			++
<div>COMMENTARY</div> <div>Proposed Modification 29 will have beneficial impacts on older people; young people; disabled people; and people with a limiting long-term illness by requiring developers to take account of opportunities to minimise ‘waste miles’ and the potential of using less polluting sustainable modes of transport for incoming and outgoing materials, since these groups are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements.. In addition, people affected by social deprivation are more likely to live in close vicinity to waste sites and therefore more likely to be adversely affected by higher levels of air pollution.</div> <div>In addition, the requirement to take further account of the safety and security of proposed waste facilities could have possible benefits for women who can be more vulnerable to crime or fear of crime. There will be less significant benefits for people affected by social deprivation; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.</div>								
<div><div><div>MODIFICATION 30</div><div>Policy WP5 final sentence – p 33</div><div><i>"The information in the schedule below will provide the basis for the assessment of the impact of a development <u>and should therefore be considered as part of any pre-application engagement.</u>"</i></div><div>• Purpose: To strengthen the links between the Plan policies and the monitoring framework;</div><div>• in response to Inspector’s Question M4(i) 13; and Previously Mods 1.18.</div></div></div>	-	-	-	-	-	-	-	-
<div>COMMENTARY</div> <div>While Modification 27 is expected to have some positive benefits for all equalities target groups, these will be no greater or less than the positive benefits predicted for the wider population (see SA Addendum Report)</div>								
<div><div><div>MODIFICATION 31</div><div>Policy WP5 – p33 Consolidated changes to WP5</div></div></div>	See respective EqIA outcomes for Modifications 26, 27, 28 and 29 above							
<div><div><div>MODIFICATION 32</div><div>Policy WP5 Schedule part 22 – page 34</div><div><i>22. Air Quality Impact Assessment, demonstrating setting out the effects on air quality in the locality of the <u>proposed development site</u> arising from <u>approved construction works, on-site waste operations and associated vehicle movements.</u> the operation of the site and vehicles movements to and from it. <u>In line with London Plan Policy SI 1 on ‘Improving Air Quality’ and the relevant Local Plan policies, Air Quality Assessments must demonstrate that proposed developments:</u></i></div><div><div><div><i>• <u>are at least ‘Air Quality Neutral’ having regard to the latest available Mayoral guidance on neutral and air quality positive approaches; promote opportunities to deliver further improvements to air quality; and do not conflict with ongoing London-wide or borough level activities aimed at reducing air pollution</u></i></div><div><i>• <u>do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; delay the date at which compliance will be achieved in areas that are currently in exceedance of national air quality objectives; or create an unacceptable risk of high ... exposure to poor air quality;</u></i></div><div><i>• <u>have assessed the cumulative impacts of multiple air pollution sources from the new development, for example, the on-site waste operations and associated vehicle movements, in combination with similar air pollution impacts from approved and proposed development, as advised by the council’s Air Quality Officer;</u></i></div><div><i>• <u>incorporate design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, including, but not limited to, children, people in poor health and the elderly; and</u></i></div><div><i>• <u>incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions.</u></i></div></div><div><div>• Purpose: To improve clarity over air quality requirements, ensure consistency with national policy and strengthen links to monitoring framework</div><div>• Previously Mod 1.19</div></div></div></div></div>			++	++	++			++
<div>COMMENTARY</div> <div>By providing further details of the content and minimum requirements of Air Quality Assessments, on air quality neutrality, potential conflict with borough or Mayoral activities, avoiding the creation of new areas that exceed national air quality objectives, incorporating design solutions to prevent or minimise exposure for vulnerable groups; and the need to-incorporate arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions, this proposed modification is assessed as having significant beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation. It is well established that older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. In addition, people affected by social deprivation are more likely to live in close vicinity to waste sites and therefore more likely to be adversely affected by higher levels of air pollution.</div> <div>There will be less significant benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</div>								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<div>MODIFICATION 33</div> <div>Policy WP5 Schedule pts 30-35 – p 34</div> <div><div><div>30</div>Measures for protecting Public Rights of Way</div><div>31</div>Transport Assessment, which may address measures such as highway safety, protecting Public Rights of Way and an access strategy</div> <div>32</div> <div>Travel Plan-Transport Management Strategies such as a Delivery Servicing Plan/Freight Plan, a Route Management Strategy, a Construction Logistics Plan and a Travel Plan.</div> <div>32</div> Route Management Strategy <div><div>33</div>Access Strategy</div> <div>34</div> Delvry Servicing Plan/Freight Pln <div>35</div> Construction Logistics Plan <div>36</div> Highway safety measures <div></div> <div><div><div>Purpose: To improve the clarity of the SLWP</div><div>Inspector’s Question M4 (i) 11; and</div><div>Previously Mod 1.20</div></div></div>	<div>No significant impacts –</div> <div>This modification does not constitute a material change in policy</div>							
POLICY WP6: SUSTAINABLE CONSTRUCTION AND DESIGN OF WASTE FACILITIES								
<div>MODIFICATION 34 (Post EiP)</div> <div>Para 5.36 – page 36</div> <div>Amend paragraph as follows:</div> <div><i>"5.36-In responding to the 'climate emergency' and the transition to a zero carbon economy within the South London Waste Plan area, all proposed waste facility developments should seek to achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' carbon emissions of construction materials. As a minimum, all major waste proposals will be required to deliver net zero carbon standards in line with London Plan Policy SI2 through application of the Mayor's energy hierarchy: (i) be lean: use less energy and manage demand during operation (ii) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly (iii) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site (iv) be seen: monitor, verify and report on energy performance. A minimum 35% reduction beyond Part L 2013 must be achieved on site for both major and minor proposals. Any shortfall in emissions reductions must then be addressed through a financial contribution to the relevant borough's carbon offset fund."</i><i>A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation. "Designing Waste Facilities—A Guide to Modern Design in Waste” (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy S12 of the 2020 London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change</i></div> <div><div><div>Post Examination Modification;</div><div>Purpose: To improve clarity and ensure consistency with London Plan policy</div></div></div>			++	++	++			++
<div>COMMENTARY</div> <div>This proposed modification will have significant beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by ensuring that waste developments achieve the highest standards of sustainable design and construction both in terms of their operational impacts and ‘whole life-cycle’ (embodied) carbon emissions; addressing the causes of climate change (long-term); helping to secure the transition to a circular economy withr less pollution and waste; minimisinge air pollution and potential impacts on sensitive land-uses (minimising potentially adverse effects on human health Older people; young people; disabled people; and people with a limiting long-term illness are disproportionately affected by climate impacts and the localised adverse effects of air pollution, dust, noise/disturbance, community severance and increased waste-related HGV movements. Apart from the longer term impacts of climate change on the above vulnerable groups, the most significant adverse effects are likely to arise from air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. In addition, people affected by social deprivation are more likely to live in close vicinity to waste sites and therefore more likely to be adversely affected by higher levels of air pollution.</div> <div>There will be less significant benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</div>								
<div>MODIFICATION 35</div> <div>Para 5.38 – page 36</div> <div>Insert new paragraph after 5.38</div> <div><i>"Developers will have to provide justified costs for their proposals to demonstrate why the 'Excellent' rating would make their proposal unviable. The details of the costs to be provided should ideally be agreed with the relevant local authority as part of pre-application engagement."</i></div> <div><div><div>Purpose: To improve the clarity of the SLWP;</div><div>Previously Mods 1.22</div></div></div>	-	-	-	-	-	-	-	-
COMMENTARY: The purpose of Modification 35 is to improve the clarity of the SLWP but this change is not expected to have significant impacts in relation any of the equalities target groups.								

Purpose: To improve the clarity of the SLWP

Inspector's Question M4 (i) 11; and

Previously Mod 1.20

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<p>MODIFICATION 36 (Post EIP) Para 5.39 – page 36 Amend as follows:</p> <p><i>"As well as addressing the causes of climate change, waste proposals must be fully adapted to the future impacts of climate change through the following measures:</i></p> <ul style="list-style-type: none"><i>Heating, Cooling and Energy Use Overheating and cooling. Addressing summer overheating and the urban heat island (UHI) effect by incorporating green infrastructure as part of the design and layout in line with the Mayor's minimum 'urban greening factor' standards in London Plan Policy G6 (or the equivalent standards set out at borough level). "Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities— A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise.</i><i>Flood Risk. Dealing with the increased frequency and severity of storm events resulting from climate change by incorporating sustainable urban design (SuDS) measures such as filter strips, permeable paving soakaways and green roofs as part of the design and layout. All waste proposals must achieve greenfield run off rates and volumes in the 1 in 100 year storm event plus climate change in line with part B of London Plan Policy SI 13; Flood Readiness. Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas.</i><i>Odours. Dealing with odour issues which are exacerbated with higher temperatures by avoiding the use of unenclosed waste facilities will become particularly vulnerable to odour issues."</i> <p><ul style="list-style-type: none">Post Examination Modification;Purpose: To improve clarity and ensure consistency with London Plan policy</p>			++	++	++			++
<p>COMMENTARY This proposed modification will have significant beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by ensuring that proposed waste developments:</p> <ul style="list-style-type: none">are fully adapted to the future impacts of climate change;addressing summer overheating and the urban heat island (UHI) effect by incorporating green infrastructure as part of the design and layoutincorporate sustainable urban design (SuDS) measures such as filter strips, permeable paving soakaways and green roofs as part of the design and layout in order to deal with the increased frequency and severity of storm events resulting from climate change and achieve greenfield run-off rates and volumes in the 1 in 100 year storm event plus climate change; andavoid the use of unenclosed waste facilities in order to minimise odour issues which are exacerbated with higher summer temperatures by <p>Older people; young people and children; disabled people; and people with a limiting long-term illness are disproportionately affected by climate impacts including overheating and the UHI effect, flooding and other impacts such as odour and particulates. In addition, people affected by social deprivation are more likely overall to be affected by poor health (exacerbated by climate change) and live in close vicinity to waste sites. While there will be benefits for women; BME/Faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</p>								
<p>MODIFICATION 37 Para 5.41 (now 5.42) – page 36 Amend as follows:</p> <p><i>"5.41 5.42 Therefore in accordance with national and regional advice, the 201921 ItP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:"</i></p> <p><ul style="list-style-type: none">Purpose: To improve clarity and consistency with London PlanPreviously Mod.1.24</p>	<p>No significant impacts –</p> <p>This modification does not constitute a material change in policy</p>							
<p>MODIFICATION 38 Para 5.40 First Sentence – p37 Amend as follows:</p> <p><i>"In the construction phase of any development, consideration should be given to Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. It is also an opportunity to promote and contribute towards the London Plan target of 95% of excavation material going to beneficial use and 95% of construction and demolition waste being reused, recycled or recovered."</i></p> <p><ul style="list-style-type: none">Purpose: To improve clarity and to ensure SLWP is consistent with the London Plan and NPPF;Previously Mod.1.26</p>	<p>No significant impacts –</p> <p>This modification is factual and does not constitute a material change in policy</p>							


	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<div><div>MODIFICATION 39</div><div>Policy WP6 part (b) – page 37</div><div>(b) Waste facilities will be required to: (v) minimise waste and promote sustainable management of construction waste <u>the beneficial use of excavation waste and the reuse, recycling or recovery of construction and demolition waste on site</u>; and</div><div><div>• Purpose: To improve clarity and to ensure the SLWP is consistent with the 2021 London Plan and NPPF</div><div>• Previously Mod.1.27</div></div></div>	-	-	-	-	-	-	-	-
No significant impacts on equalities target groups are identified								
POLICY WP7: THE BENEFITS OF WASTE								
<div><div>MODIFICATION 40 (Post EIP)</div><div>Para 5.44 last sentence – page 38</div><div>Amend as follows:</div><div>"Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted. <i>Notwithstanding this, the Mayor's London Plan sets out a number of benefits from waste that should be encouraged when development proposals are brought forward. Therefore, in accordance with London Plan Policy SI 8 Part D, the South London Waste Plan Boroughs will support schemes that also propose additional benefits alongside waste operations.</i>"</div><div><div>• Post Examination Modification</div><div>• Purpose: To improve clarity and ensure consistency with London Plan policy</div></div></div>			+	+	+			+
<div>COMMENTARY</div> <div><p>This proposed modification (together with Modification 41 – see below) will have some potential benefits for on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by encouraging waste proposals which deliver additional environmental benefits alongside waste operations such as achiving circular economy objectives; reducing life-cycle carbon impacts; supporting co-location (complementary waste management and secondary material processing facilities on a single site); support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets; and contribute towards renewable/ efficient energy generation.</p><p>Older people; young people and children; disabled people; and people with a limiting long-term illness are disproportionately affected by climnate change, higher levels of pollution and additional HGV moivements which result from the inefficient use of waste sites; a failure to promote the co-location of complementary waste management and secondary material processing facilities and a failure to promote renewable energy generation</p><p>In addition, people affected by social deprivation may benefit fron prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets including in terms iof employment opportunities.</p><p>While there will be benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</p></div>								
<div><div>MODIFICATION 41 (Post EIP)</div><div>Policy WP7 – page 38</div><div>Amend as follows:</div><div>"<i>WP7 The Benefits of Waste</i> <i>Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.</i> <i>Waste development for additional Energy from Waste facilities will not <u>that can deliver additional benefits, as set out in London Plan Policy SI 8 Part D, Points 3 and 4, will be supported</u> encouraged.</i> <i>Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities"</i></div><div><div>• Post Examination Modification</div><div>• Purpose: To improve clarity and ensure consistency with London Plan policy.</div></div></div>			+	+	+			+
<div>COMMENTARY</div> <div><p>Modification 41 (together with Modification 40 – see above) will have some potential benefits for on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by encouraging waste proposals which deliver additional environmental benefits alongside waste operations such as achiving circular economy objectives; reducing life-cycle carbon impacts; supporting co-location (complementary waste management and secondary material processing facilities on a single site); support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets; and contribute towards renewable/ efficient energy generation.</p><p>Older people; young people and children; disabled people; and people with a limiting long-term illness are disproportionately affected by climnate change, higher levels of pollution and additional HGV moivements which result from the inefficient use of waste sites; a failure to promote the co-location of complementary waste management and secondary material processing facilities and a failure to promote renewable energy generation</p><p>In addition, people affected by social deprivation may benefit fron prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets including in terms iof employment opportunities.</p><p>While there will be benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</p></div>								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
POLICY WP8:NEW DEVELOPMENT AFFECTING WASTE SITES								
<div>MODIFICATION 42</div> <div>Policy WP8 – page 39</div> <div>Amend as follows:</div> <div>"WP8 New Development Affecting Waste Sites</div> <div><i>New development should be designed to ensure that existing, <u>consented or safeguarded</u> waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.</i></div> <div><i>Where new development is proposed that may be affected by an existing, <u>consented or safeguarded</u> waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:</i></div> <div><i>(i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision;</i></div> <div><i>(ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligation;</i></div> <div><i>(iii) <u>Engage early with the operator of the waste site to ensure a full understanding of the operation (including on-site activities and hours of operation) and to ensure baseline assessments are robust.</u></i></div> <div><div>• Purpose: To improve clarity and consistency within the SLWP</div><div>• Previously Mod.2 (with minor changes)</div></div>	-	-	-	-	-	-	-	-
<div>COMMENTARY</div> <div>No significant additional benefits for equalities target groups are identified.</div>								
POLICY WP9:PLANNING OBLIGATIONS								
<div>MODIFICATION 43</div> <div>Para 5.52 – page 40</div> <div>Amend examples as follows:</div> <div><div>• "<i>Transport Management Strategies, that include Delivery and Servicing Plans that incorporate measures to: manage traffic routes to the site</i></div><div><i>Traffic management measures, including the routing of vehicles; supporting staff to travel sustainably; ensure improving road safety; reducing</i></div><div><i>reduce</i> freight traffic, particularly at peak times, <i>facilitate a transition to low emission vehicles and a monitoring regime.</i></div><div>• <i>off-site</i> <i>post implementation</i> <i>monitoring of emissions</i> <i>and reporting of impacts upon</i> the water environment, <i>particularly for new or intensified</i></div><div><i>waste sites adjacent to main rivers or other watercourses</i></div><div>• <i>post implementation monitoring and annual reporting of local air quality and polluting emissions from both on-site waste operations and</i></div><div><i>associated HGV movements in the vicinity of new or intensified waste sites against national air quality objectives and any relevant emissions</i></div><div><i>limits set as part of the planning permission and/or waste license</i>"</div></div> <div><div>• Purpose: To improve the clarity of the SLWP with regards to examples of planning obligations that could be sought. Previously Mod.1.28</div></div>			++	++	++			++
<div>COMMENTARY</div> <div>Modification 43 assessed as having beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by ensuring that planning obligations are used to require developers to:</div> <div><div>• undertake post implementation monitoring and annual reporting of local air quality and polluting emissions from both on-site waste operations and associated HGV movements in the vicinity of new or intensified waste sites against national air quality objectives and any relevant emissions limits set as part of the planning permission and/or waste license;</div><div>• undertake post implementation monitoring and annual reporting of impacts upon the water environment; and</div><div>• implement transport management strategies</div></div> <div>Since older people; young people and children; disabled people; and people with a limiting long-term illness are disproportionately affected by the adverse effects of air pollution, water pollution, noise/disturbance, community severance and road safety issues arising from waste-related HGV movements. In addition, people affected by social deprivation are more likely to live in close vicinity to waste sites and therefore more likely to be adversely affected by higher levels of air pollution. There will be less significant benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</div>								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 44 Policy WP9 – page 40 Amend as follows: <i>"Policy WP9 Planning Obligations</i> <i>Planning obligations will be used to ensure that all new Waste development or waste redevelopment <i>must ensure that where these have off-site impacts, these are addressed to make the development acceptable</i> provide that these are mitigated meets on and off site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development."</i>	No significant impacts – Clarification of the approach to planning obligations as set out in planning legislation and national policy							
• Purpose: consistency with NPPF. Previously Mod.2.1								
POLICY WP10 MONITORING AND CONTINGENCIES								
MODIFICATION 45 Para 5.54– page 41 <i>"The South London Waste Plan boroughs recognise that on-going plan monitoring and review are essential to:</i> <ul style="list-style-type: none"><i>delivering objectives of the plan;</i><i>assessing the implementation of the strategic policies;</i><i>analysing the effectiveness of policies; and</i><i><u>analysing waste planning permissions and compliance with planning conditions and obligations.</u></i>			+	+	+			+?
• Purpose: To improve clarity around monitoring and to ensure consistency with national policy • Previously Mod.1.28a								
COMMENTARY Modification 45 will have possible benefits with respect to older people; young people and children; disabled people; and people with a limiting long-term illness; by ensuring that all approved developments for new or intensified waste facilities comply with their planning conditions and/or obligations. This will be achieved by enforcing all relevant planning requirements to undertake post implementation monitoring and annual reporting of local air quality and polluting emissions in line with the aims of Policy WP10. There will be less significant benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.								
MODIFICATION 46 (Post EiP) After Para 5.57 – page 41 <i>"The South London Waste Plan boroughs will engage with all relevant Duty to Cooperate stakeholders on an ongoing basis in a constructive, an active and an ongoing basis on any relevant strategic matters. A lead borough shall be nominated to carry out this responsibility as and when required."</i>	+	+	+	+	+	+	+	+
Purpose: To improve the clarity of the SLWP and to make clear the Plan’s ongoing commitment to DtC								
COMMENTARY Modification 46 will have potential benefits for all equalities target groups by ensuring that the SLWP boroughs continue to engage with all relevant Duty to Cooperate stakeholders in a constructive, an active and an ongoing basis on any relevant strategic matters. with each other and with all other relevant 'duty to cooperate' bodies to monitor the plan and the copordinate ant necessary contingency actions to ensure that the plan’s strategic objectives, policies and targets are met.								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<p>MODIFICATION 47 (Post EiP) Para 5.59 First Sentence – p41 Insert new paragraphs after 5.58 <i><u>"In addition to monitoring the implementation of the Plan, it is equally important to ensure the performance of operational waste sites is monitored too. This is the responsibility of a number of parties, namely: The South London Waste Plan Boroughs, the Environment Agency and waste site operators.</u></i> <i><u>The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health. The operator's performance in relation to that responsibility is assessed by checking compliance with the terms and conditions of the permit.</u></i> <i><u>"Environmental permits are issued by either the Environment Agency for large-scale facilities and those with greater risk to the environment (known as "A1 installations") or the local authority for smaller-scale facilities with lower risk to the environment (which include "A2 installations" and "Part B installations"). The responsibility for checking compliance falls to the issuer of the permit (the regulator).</u></i> <i><u>Regulations are the basis for any enforcement action and the principal offences are:</u></i> <i><u>• operating [without] a permit;</u></i> <i><u>• causing or knowingly permitting a water discharge activity or groundwater activity without a permit;</u></i> <i><u>• The Environmental Permitting failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice.</u></i> <i><u>Operator competence can be considered by the regulator at any time, whether as part of the determination of an application or at any time during the life of the permit. The regulator can suspend or revoke the permit if an operator fails to comply with the conditions of the permit, risking harm to the environment or human health.</u></i> <i><u>The SLWP Boroughs will monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the Waste AMR. Any additional information on enforcement action can be requested from the regulator. In addition, planning legislation gives powers to local authorities to take enforcement action where development has been carried out, either: without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not be delivered. As such, the South London Waste Boroughs' individual Planning Enforcement teams will investigate alleged planning breaches related to waste developments within their respective boroughs. When considering what action to take, if necessary, the Boroughs will have regard to national planning policy and guidance, and any relevant legislation.</u></i></p> <p>• Post Examination Modification • Purpose: To improve clarity of the SLWP with regards to the different stakeholders involved in monitoring and what their roles are</p>			++	++	++			++
<p>COMMENTARY Modification 45 will have significant benefits with respect to older people; young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none">clarifying the respective roles and rsponsibilities of the SLWP Boroughs, the EA and waste site operators in terms of monitoring and reporting on breaches of planning obligations, enforcement notices and/or waste permitting conditions; andsetting out a commitment for the SLWPO Boroughs to monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the Waste AMR.making use of powers laid down in planning legislation for local authorities to take enforcement action where development has been carried out, either (i) without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not be delivered.ensuring that planning enforcement officers within each partner borough will investigate and enforce alleged planning breaches related to waste developments having regard to the relevant legislation.								
<p>MODIFICATION 48 Policy WP10 – page 41 Amend as follows: <i>"Policy WP10</i> <i>The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report (AMR) will report <u>on the outcome of plan</u> the monitoring and the boroughs, in consultation with each other <u>and with other relevant Duty to Cooperate bodies as appropriate, such as the GLA, LWARB, EA, the South London Waste Partnership and the waste management industry,</u> will decide whether it is necessary to implement any of the contingency actions in light of the monitoring."</i></p> <p>• Purpose: To improve the clarity of the SLWP with regards to those stakeholders likely to be engaged in DtC and contribute towards the monitorin of the Plan • Previously Mod 2.2</p>	-	-	-	-	-	-	-	-
<p>COMMENTARY No significant impacts are identified specifically with respect to equalities target groups .</p>								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<p>MODIFICATION 49 How to read the information on Safeguarded Sites – page 43 Under 'Maximum throughput (in tonnes per annum)′- amend as follows:</p> <p><i>"The maximum throughput achieved by the site in any one year between 2013 and 2017 in the last five year period, using the latest available information from the Environment Agency Waste Data Interrogator. The 2019 ItP 2021 London Plan recommends that boroughs should use this measure to assess capacity."</i></p> <ul style="list-style-type: none">• Purpose: To improve the clarity and consistency of the SWLP and to ensure the latest London Plan is referenced ;• Previously Mod.1.25	<p>No significant impacts – This modification does not constitute a material change in policy</p>							
<p>SITES AND FIGURES</p>								
<p>MODIFICATION 50 (Post EiP) Sites and figures – pages 44 to 91 Update figures in accordance with the Figures set out in the updated Appendix 2 in Annex 1 to the Modifications Schedule.</p> <ul style="list-style-type: none">• Purpose: So the SLWP reflects the latest available data at the time of the hearings.	<p>No significant impacts – This modification is factual and does not constitute a material change in policy</p>							
<p>MODIFICATIONS 51, 53-56, 59, 62, 65-69, 72, 75-79, 84, 89-90, 98, 101-102, 104, 108, 110-111, 113 and 117</p> <p>Amend 'Issue to Consider' as follows:</p> <p><i>"Protecting the residential amenity Avoiding harm to the living conditions of the occupants of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts."</i></p> <p>MODIFICATION 51 Site C4 – page 45 MODIFICATION 53 Site C5A – page 46 MODIFICATION 54 Site C5b – page 47 MODIFICATION 55 Site C6 – page 48 MODIFICATION 56 Site C6 – page 48 MODIFICATION 59 Site C9 – page 51 MODIFICATION 62 Site C10 – page 51 MODIFICATION 65 Site C12 – page 4 MODIFICATION 66 Site C13 – page 55 MODIFICATION 67 Site K2 – page 57 MODIFICATION 68 Site K3 – page58 MODIFICATION 69 Site K4 – page 59 MODIFICATION 72 Site M1 – page 61 MODIFICATION 73 Site M3 – page 63 MODIFICATION 74 Site M4 – page 64 MODIFICATION 75 Site M5 – page 65 MODIFICATION 78 Site M7 – page 67 MODIFICATION 79 Site M8 – page 68 MODIFICATION 84 Site M11 – page 71 MODIFICATION 89 Site M13 – page 73 MODIFICATION 90 Site M14 – page 72 MODIFICATION 98 Site M16 – page 76 MODIFICATION 101 Site M17 – page 77 MODIFICATION 102 Site M18 – p78 MODIFICATION 104 Site S2 – page 81 MODIFICATION 108 Site S3 – p81 MODIFICATION 110 Site S4 – p83 MODIFICATION 111 Site S7 – p86 MODIFICATION 113 Site S9 – p88 MODIFICATION 117 Site S12 – p 91</p> <ul style="list-style-type: none">• Purpose: To improve clarity and ensure consistency across safeguarded sites in the SLWP			++	++	++			++
<p>COMMENTARY Modifications 51, 53-56, 59, 62, 65-69, 72, 75-79, 84, 89-90, 98, 101-102, 104, 108, 110-111, 113 and 117 are expected to have beneficia impacts with respect to older people; young people and children; disabled people; and people with a limiting long-term illness; by setting out a strengthened commitment for new or intensified waste developments to “avoid harm” to the living conditions of the occupants of residential properties in the vicinity of each of the 30 allocated sites listed, especially with regard to air emissions, HGV movements and noise impacts. There will be less significant benefits for women; BME/faith groups; LGTB people and gypsies & travellers and these will be broadly in line with those experienced by the wider community.</p>								
<p>MODIFICATIONS 52 AND 70 ‘Opportunity to increase waste managed’ - Delete sentence:</p> <p><i>"There are no plans by the South London Waste Partnership to intensify operations at this site."</i></p> <p>MODIFICATION 52: Site C5a, p 46 MODIFICATION 70: Site K4, p 59</p> <ul style="list-style-type: none">• Purpose: Contributes to consistency, clarity and updates with the latest information• in response to Con25/Rep 90 from South London Waste Partnership:• Previously Mods 3 and 4.	<p>No significant impacts – factual change</p>							
<p>MODIFICATIONS 57 and 115 Add the Tier number to the archaeological consideration:</p> <p><i>"Evaluating and preserving any archaeological remains (Tier 4)"</i></p> <p>MODIFICATION 57: Site C7 – p 49 MODIFICATION 115:Site S10–p 89</p> <ul style="list-style-type: none">• Purpose: To improve clarity and ensure consistency across safeguarded sites in the SLWP.• Inspector’s Question M4 [vi] 2c; and Previously Mod 12.9	-	-	-	-	-	-	-	-
<p>COMMENTARY: Modifications 57 and 115 are not expected to have any significant impacts with respect to any of the equalities target groups forming the basis of this EqIA.</p>								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 58 Site C8: Issues to consider – p 50 <i>Conserving, and where possible enhancing, Ensuring the preservation or enhancement of the setting and significance of Airport House, a Grade II* Listed building opposite</i> <ul style="list-style-type: none">• Purpose: To ensure consistency with national policy• Previously Mod 3.2	-	-	-	-	-	-	-	-
COMMENTARY Modification 58 is not expected to have any significant impacts with respect to any of the equalities target groups forming the basis of this EqIA.								
MODIFICATION 60 Site C9: Issues to consider – p51 Amend issue as follows: <i>"Developers planning to intensify develop the safeguarded site should pay particular attention to:</i> <ul style="list-style-type: none">• <i>Designing the site so that operations, whether already on site or proposed to be situated in replacement buildings, are would be carried out within fully enclosed building(s) that do not impact the openness of the Green Belt/MOL."</i> <ul style="list-style-type: none">• Purpose: To improve clarity and ensure consistency with national policy;• Previously Mod 3.3 (with minor changes)	-	-	-	-	-	-	-	-
COMMENTARY Modification 60 is not expected to have any significant impacts with respect to any of the equalities target groups forming the basis of this EqIA.								
MODIFICATION 61 Site C9: Map – page 1 Replace existing site boundary with the site boundary in red on the map above. 	No significant impacts – factual change							
<ul style="list-style-type: none">• Purpose: To improve clarity and correct an error).• previously Mod 3.2								
MODIFICATION 63 Site C10: Issues to consider – page 52 Amend issue as follows: <i>"The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018 and attention should be paid to ensure satisfactory residential amenity of the for any existing and future occupiers of this allocation."</i> <ul style="list-style-type: none">• Purpose: To ensure residential amenity is protected for G & Ts• Inspector’s Question M4 [vi] 2i• Previously Mod. 3.5							++	
COMMENTARY Modification 63 is assessed as having strongly beneficial impacts on Gypsies and Travellers bt requiring proposed waste developments to maintain residential amenity for the occupiers of this allocated gypsy and traveller site, this proposed modification is assessed as having								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 64 Site C11– page 53 Delete this site and all reference to it in the Plan <ul style="list-style-type: none">The site has planning permission for a waste use but this has not been implemented. Site is currently being used for industrial uses and the land owners do not intend to implement the waste permissionInspector’s Question M3 [v] 6Previously Mod 3.6	No significant impacts							
MODIFICATION 71 After Site K4 – page 55 Add new site safeguarding sheet: <i>"K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD"</i> See Annex 1 to Modifications Schedule <ul style="list-style-type: none">Purpose: To consistency, clarity and updates with latest information	-	-	-	-	-	-	-	-
COMMENTARY Modification 71 is not predicted to have any significant impacts with respect to any of the equalities target groups forming the basis of this EqIA.								
MODIFICATIONS 76, 82, 85, 88, 91, 94, 99, 109, 112 and 119 Issues to consider (multiple sites) Amend bullet point as follows: <i>"Designing a facility that does not impact on the openness of <u>takes into consideration its wider visual or landscape effects on the adjoining Metropolitan Open Land</u>".</i> <div><div><u>MODIFICATION 76:</u> Site M6 - p66 <u>MODIFICATION 82:</u> Site M10 – p70 <u>MODIFICATION 85:</u> Site M11 – p 71 <u>MODIFICATION 88:</u> Site M12 – p72 <u>MODIFICATION 91:</u> Site M14 – p72</div><div><u>MODIFICATION 94:</u> Site M15 – p 75 <u>MODIFICATION 99:</u> Site M16 – p76 <u>MODIFICATION 109:</u> Site S3 – p82 <u>MODIFICATION 112:</u> Site S7 – p86 <u>MODIFICATION 119:</u> Site S12 – p91</div></div> <ul style="list-style-type: none">Purpose: To ensure consistency with national policy and internal consistency in SLWPRelated to previous Mod 3.1.	-	-	-	-	-	-	-	-
COMMENTARY Modifications 76, 82, 85, 88, 91, 94, 99, 109, 112 and 119 are not predicted to have any significant beneficial or adverse impacts specivally with respect to any of the equalities target groups forming the basis of this EqIA.								
MODIFICATIONS 77, 83, 87, 92, 93, 95, 100, 106-107 and 118 Issues to consider Insert the following as an additional bullet point: <i>"Protecting the amenity of the Wandle Valley Regional Park and those using it."</i> <div><div><u>MODIFICATION 77:</u> Site M6, page 66 <u>MODIFICATION 83:</u> Site M10, page 70 <u>MODIFICATION 87:</u> Site M12, page 72 <u>MODIFICATION 92:</u> Site M14, page 74 <u>MODIFICATION 93:</u> Site M15, page 75</div><div><u>MODIFICATION 95:</u> Site M15, page 75 <u>MODIFICATION 100:</u> Site M16, p 76 <u>MODIFICATION 106:</u> Site S2, page 81 <u>MODIFICATION 107:</u> Site S3, page 81 <u>MODIFICATION 118:</u> Site S12, p91</div></div> <ul style="list-style-type: none">Purpose: To improve the clarity and consistency of the SLWPRelated to previous Mod 3.1.	-	-	-	-	-	-	-	-
COMMENTARY Modifications 77, 83, 87, 92, 93, 95, 100, 106-107 and 118 are not predicted to have any significant beneficial or adverse impacts specivally with respect to any of the equalities target groups forming the basis of this EqIA.								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 80 Site M9: Opportunity to increase waste managed – page 69 Delete: <i>"No. The plot throughput ration is above the average for this type of facility so there are unlikely to be opportunities to intensify the throughput"</i> Add: <i>"Yes. Although the plot throughput ratio is currently above average for this type of facility any forthcoming planning application seeking opportunities to intensify the throughput would need to demonstrate that the site has the appropriate environmental capacity"</i> <div><div><div>• Purpose: Contributes to consistency, clarity and updates with the latest information</div><div>• in response to Con16/Rep 94 from Mr M Kelly as agent</div><div>• Previously Mod 6</div></div></div>	-	-	-	-	-	-	-	-
COMMENTARY Modification 80 is not predicted to have any significant beneficial or adverse impacts specifivally with respect to any of the equalities target groups forming the basis of this EqIA.								
MODIFICATION 81: Site M9, page 69 MODIFICATION 96: Site M15, page 7 Issues to consider Amend as follows: <i>"Protecting the residential amenity Contributing positively to the living conditions of those residential properties in the vicinity of the site, especially with regard to air emissions and noise impacts."</i> <div><div><div>• Purpose:. To improve clarity and ensure consistency across safeguarded sites in the SLWP</div><div>• Previously Mod 2.4</div></div></div>			+	+	+			+
COMMENTARY Modifications 81 and 96 will have sonme potential benefits with respect to older people; young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by including the aim of 'contributing positively' to the residential amenity of those properties in the vicinity of the respective sites (M9 and M15) as one of the 'issues to consider', There are no benefits specifically relating tr Women; BME/Faith groups; LGTB people or Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.								
MODIFICATION 86 Site M12: Issues to consider p72 Amend as follows: <i>"Protecting the residential amenity of those properties (both bricks and mortar and Gypsy and Traveller accommodation) in the vicinity of the site, especially with regard to air emissions and noise impacts"</i> <div><div><div>• Purpose: To ensure residential amenity is protected for Gypsy and Travellers</div></div></div>							++	
COMMENTARY Modification 86 is assessed as having strongly beneficial impacts on Gypsies and Travellers by ensuring that any proposed waste facilities on site M12 wil protect the residential amenity for accupants of gyspsy and traveller accommodation as well as built dwellings ('bricks and mortar), this proposed modification is expected to haveas having								
MODIFICATION 97 Site M16: Issues to consider – p76 Delete <i>"Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area".</i> Replace with: <i>"Conserving, and where possible enhancing, the significance of the Wandle Valley Conservation Area"</i> <div><div><div>• Purpose: To ensure consistency with national policy</div><div>• response to Con44/Rep 103 from Historic England and Inspector’s Question M4 [vii] 2e</div><div>• Previously Mod 12.1</div></div></div>	-	-	-	-	-	-	-	-
COMMENTARY Modification 97 is not predicted to have any significant beneficial or adverse impacts specifivally with respect to any of the equalities target groups forming the basis of this EqIA								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
MODIFICATION 103 Site S1 777 Recycling Centre–p 80 Delete Site S1 ‘777 Recycling Centre’ and any other references to it in the Plan. <div>• Purpose: Site throughput has significantly declined and will continue to do so. Operations are due to cease due to viability SLWP has sufficient capacity to achieveself-sufficiency without it</div>	-	-	-	-	-	-	-	-
COMMENTARY Modification 103 is not predicted to have any significant beneficial or adverse impacts specifivally with respect to any of the equalities target groups forming the basis of this EqIA								
MODIFICATION 105 Site S2: Issues to consider – p 81 Insert additional bullet point: <i>"Undertaking an air quality assessment and transport assessments in accordance with the requirements of Policy WP5"</i> <div>• Purpose: Improve clarity of the SLWP and internal consistency • in response to Inspector’s Question M4 [vii] 20 • Previously Mod 12.5</div>	-	-	-	-	-	-	-	-
COMMENTARY Modification 105 in itself will not any significant beneficial or adverse impacts specifically with respect to any of the equalities target groups forming the basis of this EqIA since the additional requirements to undertake air quality assessment and transport assessments is in accordance with Policy WP5								
MODIFICATION 114 Site S10: Issues to consider – p89 Amend bullet point as follows: <i>"Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads 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"</i> <div>• Inspector’s Question M4 (vii) 2L • Previously Mod 12.8</div>			+	+	+			+
COMMENTARY Proposed Modification 114 will have beneficial impacts with respect to older people; young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by amending the ‘issues to consider’ to require an assessment of the cumulative impacts on the highway network (in discussion with TfL) and opportunities for limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads. There are no benefits specifically relating to women; BME/Faith groups; LGTB people or Gypsies & Travellers and these will be broadly in line with those experienced by the wider community.								
MODIFICATION 116 Site S11: TGM Environment – p 90 Delete Site S11 from schedule of safeguarded sites, Appendix 2 and any other references in the Plan. <div>• Purpose: The site has planning permission for a waste use but this has not been implemented. Currently being used for industrial uses and the land owners do not intend to implement the permission. • Inspector’s Question M3 [iv] 9 • Previously Mod 12.10</div>	No significant impacts – factual change							
MODIFICATION 120 Appendix 1: Monitoring Table–p93 Modify the Monitoring and Contingencies Table in accordance with Annex 2 <div>• Purpose: To ensure that the monitoring of the SLWP is effective. • in response to multiple Inspector’s questions regarding plan monitoring</div>			++	++	++			++
COMMENTARY By significantly expanding the scope of future monitoring and reporting on SLWP objectives and targets in order to address specific issues of concern highlighted by objectors and the Inspector, principally around minimising the adverse impacts of air pollution, dust, noise and HGV movements associated with waste operations, and by identifying the actions to be taken in the event that SLWP objectives and targets are not being delivered, Modification 120 is expected to have significant benefits for older people; young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation .								

	IMPACTS ON EQUALITY TARGET GROUPS							
	Women	BME/ Faith groups	Older people	Young people and children	Disabled people and limiting long- term illness	Lesbians, gays bisexuals and transgender	Gypsies and Travellers	People Affected by Social Deprivation
<div><div><div>MODIFICATION 121</div><div>Appendix 2 – page 99</div><div>Update Appendix 2 in accordance with Annex 3 to this Schedule of Main Modifications</div><div>Purpose: Contributes to consistency, clarity and updates with the latest information.</div></div></div>	No significant impacts – factual change							
<div><div><div>MODIFICATION 122</div><div>Appendix 3– page 102</div><div>Amend Site S1 ‘777 Recycling’ as follows: <i>"Safeguarding carried forward as , Site S1 The throughput of the , Site has significantly declined and the operator is planning to cease operations due to viability. Capacity from this site is no longer required to meet the waste apportionment."</i></div><div>Purpose: To ensure internal consistency within the SLWP</div></div></div>	-	-	-	-	-	-	-	-
<div><div>COMMENTARY</div><div>Modification 122 is not predicted to have any significant beneficial or adverse impacts specifivally with respect to any of the equalities target groups forming the basis of this EqIA</div></div>								
<div><div><div>MODIFICATION 123</div><div>Appendix 4: Glossary – page 104</div><div>Additions to the Glossary: <i>'Consented Waste Site: A site that has planning permission for a new waste management facility or an existing , Site that has planning permission where an increase in intensification is permitted, for example where: longer operating times are permitted on the existing site; and/or additional storage, machinery, buildings, parking or access roads are permitted on the existing site; and/or the boundary of the site is extended to allow for either of the above.</i> <i>Existing Waste site: A waste site that is materially in operation as a waste site</i> <i>Safeguarded Waste site: A site that is safeguarded for waste uses. This may include sites that are materially operational as waste facilities, vacant waste facilities or vacant plots of land that are safeguarded for waste.</i></div></div></div>	No significant impacts – factual change							
<div><div><div>MODIFICATION 124</div><div>Appendix 5: Superseded Policies – page 106</div><div>Add new Appendix 5 as follows: Appendix 5 South London Waste Plan 2012 Superseded Policies (*various)</div></div></div>	No significant impacts – factual change							

4. Conclusions

Overall EqIA Outcome

4.1 The overall outcome of the EqIA process, taking account of the findings of the initial EqIA Screening Report on South London Waste Plan (SLWP) 'Issues and Preferred Options' (October 2019); the EqIA on the SLWP Proposed Submission Version (October 2020); and the EqIA Final Addendum Report on Proposed Modifications (June 2022 – this report), shows that the SLWP will have beneficial impacts on all equality target groups identified for the purposes of the assessment and are not expected to lead to adverse discriminatory impacts upon any particular group.

4.2 The assessment matrix included at each of the previous stages of the EqIA process has provided a detailed assessment and discussion of the likely impacts for each emerging policy (Policies WP1-WP10); for each safeguarded waste site taking account of associated environmental controls; and for each of the proposed actions set out in the monitoring framework. By contrast, the focus of this final EqIA Addendum report is to assess the additional implications of each of the proposed modifications to the plan.

4.3 Overall, the EqIA process has demonstrated that the draft SLWP 2022-2037 proposed for adoption (i.e. Option 1 as modified), will have positive impacts mostly for older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation by comparison with both Option 2: Existing Plan (Exceed Apportionment) and Option 3 'Do-Nothing' scenario (i.e. allow 2012 SLWP to expire and not be replaced) by:

- minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or 'broad locations' in South London over the plan period;
- minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality;
- safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses
- ensuring that waste facilities are fully adapted to climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS.
- providing a greater degree of certainty about the nature and extent of planned waste related developments would serve to reassure local communities and equalities target groups in particular over what to expect. There are therefore be particular benefits for BME people, certain faith groups, older people and young people, who are more likely to live within socially deprived areas already affected by a poor quality environment and in close proximity to potential waste sites;
- promoting the circular economy and the co-location of complementary waste facilities to support manufacturing-from-waste with waste management facilities has potentially significant benefits for certain equalities target groups, in particular certain faith groups, older people and young people, who are more likely to be affected by social and economic deprivation, who would thus benefit from enhanced and more widespread local employment and educational opportunities; and
- co-location, along with other measures likely to promote 'linked trips', would have particular benefits for disabled people, along with children and older people, who are more vulnerable to the adverse health and social impacts of road transport compared to the wider community.

- introducing a new commitment through proposed Policy WP8 'New Development Affecting Waste Sites' to ensure that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and quality of life. In certain circumstances, this will help to avoid or mitigate the adverse impacts of waste operations and associated HGV movements on vulnerable groups such as the elderly, the young, people suffering from health problems and people living within socially deprived areas arising from air pollution, dust, noise, water pollution, surface water run-off, light pollution and impacts on the local road network; and
- introducing a range of new commitments through Policy WP10 'Monitoring and Contingencies' and through substantially expanded monitoring framework to ensure that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on an annual basis and that consultation will take place between the partner boroughs to determine whether any of the identified contingency actions need to be taken. Ongoing monitoring and review is therefore provides a further guarantee that the various beneficial impacts for equalities groups identified in the EqIA matrix can be delivered.

4.4 Overall, there will be less significant benefits specifically in relation to Women; BME/Faith groups; LGTB people and Gypsies & Travellers since any beneficial impacts on these groups are likely to be broadly in line with those experienced by the wider community.

Findings of the EqIA Addendum Report on Modifications

4.5 While some of the proposed modifications to the SLWP are updates or factual in nature and therefore have no positive or adverse impacts on equalities target groups, a significant proportion are assessed as having further beneficial impacts mainly for older people; young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation.

4.6 As discussed in the assessment matrix and above, these groups are disproportionately affected by the adverse impacts of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased waste-related HGV movements and certain waste operations. These impacts include a higher risk of respiratory disease resulting from elevated levels of nitrogen dioxide (NO₂) and particulates particularly within the vicinity of waste sites and the surrounding road network. These groups also tend to be disproportionately affected by noise/disturbance, loss of amenity, negative impacts upon quality of life and the longer term impacts arising from climate change.

4.7 People affected by social deprivation may also be affected by the reduced local employment opportunities that might result from safeguarding more industrial land for waste uses than is needed to deliver the apportionment and self-sufficiency.

4.8 The most significant modifications to the plan in terms of having potential benefits for equalities groups – mainly through minimising the environmental impacts of waste operations and associated HGV movements on surrounding vulnerable land uses are summarised below.

The SLWP - What it is?

4.9 Modification 1 will have beneficial impacts on all equalities groups by ensuring that:

- all sections of the community across the four boroughs, including all equalities target groups, understand how they are able to contribute to the planning process;
- when waste planning applications are submitted to the Boroughs community involvement will be sought in accordance with the relevant Boroughs' SCI

Vision and Objectives

4.10 Modification 5 will have beneficial equalities impacts by:

- emphasising the SLWP boroughs' shared commitment to monitor cross-boundary waste movements over the period of the plan; and
- where plan monitoring identifies that policy objectives and targets for minimising air pollution in close proximity to operational waste sites; promoting net self-sufficiency; promoting an environmentally sustainable strategic approach to managing South London's waste arisings; promoting waste re-use, recycling and recovery; securing the transition to a circular economy are not being achieved, undertaking the relevant 'Management Actions' set out in Appendix 1 to the SLWP on 'Monitoring and Contingencies' (as amended)

4.11 Modification 7C will have beneficial impacts by incorporating the core aim of achieving net self-sufficiency as part of the wording of Objective 2, together with meeting the combined apportionment targets for the management of Household and Commercial and Industrial (HCI) waste and for other forms of waste including Construction and Demolition (C&D), excavation, low level radioactive and agricultural waste. Assuming that Objective 2 is delivered as part of an environmentally sustainable strategic approach to managing South London's waste arisings over the plan period, achieving net self-sufficiency and meeting the combined apportionment will further serve to minimise cross-boundary waste movements over the period of the plan and local pollution arising from additional waste-related HGV movements that would otherwise occur.

4.12 Modification 7E will have potential benefits on people affected by social deprivation by supporting the need for sufficient land for other employment generating industrial uses within strategic industrial locations (SILs) and locally significant industrial locations (LSILs) and by not safeguarding more land for waste management than is required. Provided that Objective 4 is delivered and monitored as part of an environmentally sustainable strategic approach to managing South London's waste arisings, this will help to address social deprivation by promoting local employment opportunities and South London's economy.

4.13 Modification 7H will have beneficial impacts by adding a new Objective supporting the movement of waste as far up the waste hierarchy as practicable. Provided that the sustainable waste management principles underlying this new objective are applied on a consistent basis over the plan period, the shift towards waste minimisation, preparing for re-use, recycling and recovery will not only improve resource efficiency and innovation to keep products and materials at their highest use for as long as possible as part of a circular economy, but significantly reduce HGV movements and pollution from waste operations.

4.14 Proposed Modification 7J will have potential beneficial impacts for all equalities target groups by introducing a new plan objective aimed at integrating the full range of social, environmental and economic considerations in delivering sustainable waste development in South London;

4.15 Proposed Modification 8 will have beneficial impacts by adding a new objective for the purpose of delivering waste management capacity in line with the proximity principle and to support the co-location of facilities to minimise waste movements and support opportunities for the circular economy. This will not only significantly reduce HGV movements and pollution from waste operations but also help to make the most efficient use of industrial land across the plan area. People affected by social and economic deprivation may also benefit from increased employment opportunities as a result of not safeguarding more land for waste management than is required.

WP1 Strategic Approach to Household and Commercial and Industrial Waste

4.16 Modification 9 will have beneficial equalities impacts by promoting the most efficient use of employment land for sustainable waste management practices, for example through intensification of existing safeguarded sites and/or co-location in line with circular economy principles, rather than

developing waste facilities on other industrial sites which are capable of accommodating other employment generating uses. This will both help to minimise waste-related HGV movements and pollution from waste sites across the plan area and avoid the unnecessary loss of industrial land outside of safeguarded sites which may have the potential to accommodate other employment generating uses.

WP2 Strategic Approach to Other Forms of Waste

4.17 Modifications 10 and 16 will have equalities benefits by optimising the provision of waste management facilities across the plan area, avoiding the development of additional travel-generating facilities for HC&I waste outside of safeguarded sites that are not needed to meet the apportionment, promoting co-location and ensuring that any new waste sites manage waste as high up the waste hierarchy as practicable. All of these policy measures will serve to minimise additional waste-related HGV movements across the plan area and other potentially adverse impacts arising from the operation of waste sites.

WP3 Safeguarding of Existing Waste Sites

4.1 Modification 19 will have equalities benefits by ensuring that waste management replacement capacity is secured before permission is granted for a non-waste use and ensuring that such compensatory provision is normally provided within the plan area. By achieving a balance between having sufficient waste management capacity within the plan area, whilst not stifling other employment-generating uses, this policy measure will both help to minimise additional waste-related HGV movements to more distant compensatory sites outside the SLWP area that would otherwise occur while at the same time avoiding the loss of industrial land and associated employment opportunities outside of safeguarded sites.

WP5 Protecting and Enhancing Amenity

4.2 Modification 28 will have beneficial impacts for equalities groups by providing increased clarity and detail on air quality objectives both in the context of determining planning applications on waste facilities but also in relation to plan monitoring and review. The following considerations must be taken into account in making planning decisions:

- air quality and polluting emissions, including dust, from approved construction works, on-site waste operations and associated vehicle movements in the locality of new or intensified waste sites, taking account of national air quality objectives and current exceedances;
- potential impacts within Air Quality Focus Areas, Air Quality Management Areas and/or the Mayor's expanded Ultra Low Emission Zone (ULEZ)
- cumulative impacts with other waste sites;
- the London Plan requirement for development proposals to be at least 'Air Quality Neutral'; and
- the use of design solutions to prevent or minimise increased exposure of people and in particular vulnerable individuals to poor air quality

4.3 Modification 32 will have strongly beneficial impacts for equalities target groups by providing much greater detail on the content of Air Quality Assessments. Air Quality Assessments must demonstrate that proposed developments:

- are at least 'Air Quality Neutral' having regard to the latest available Mayoral guidance on neutral and air quality positive approaches; promote opportunities to deliver further improvements to air quality; and do not conflict with ongoing London-wide or borough level activities aimed at reducing air pollution
- do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; delay the date at which compliance will be achieved in areas that are currently in exceedance of national air quality objectives; or create an unacceptable risk of high ... exposure to poor air quality;
- have assessed the cumulative impacts of multiple air pollution sources from the new

development, for example, the on-site waste operations and associated vehicle movements, in combination with similar air pollution impacts from approved and proposed development, as advised by the council's Air Quality Officer;

- incorporate design solutions to prevent or minimise increased exposure of people particularly vulnerable to poor air quality, including, but not limited to, children, people in poor health and the elderly; and
- incorporate proposed arrangements for post implementation monitoring and annual reporting of local air quality and polluting emissions

Policy WP6: Sustainable Construction and Design of Waste Facilities

4.4 Modification 34 will have beneficial impacts for equalities groups by ensuring that waste developments achieve the highest standards of sustainable design and construction both in terms of their operational impacts and 'whole life-cycle' (embodied) carbon emissions; addressing the causes of climate change (long-term); helping to secure the transition to a circular economy with less pollution and waste; minimising air pollution and potential impacts on sensitive land-uses (minimising potentially adverse effects on human health).

4.5 Modification 36 will have beneficial impacts by ensuring that proposed waste developments:

- are fully adapted to the future impacts of climate change
- address summer overheating and the urban heat island (UHI) effect by incorporating green infrastructure as part of the design and layout
- incorporate sustainable urban design (SuDS) measures and achieve greenfield run-off rates; and
- avoid the use of unenclosed waste facilities in order to minimise odour issues which are exacerbated with higher summer temperatures .

Policy WP9: Planning Obligations

4.6 Modification 43 will have beneficial equalities impacts by ensuring that planning obligations are used to require developers to:

- undertake post implementation monitoring and annual reporting of local air quality and polluting emissions from both on-site waste operations and associated HGV movements in the vicinity of new or intensified waste sites against national air quality objectives and any relevant emissions limits set as part of the planning permission and/or waste license;
- undertake post implementation monitoring and annual reporting of impacts upon the water environment; and
- implement transport management strategies;

Policy WP10: Monitoring and Contingencies

4.7 Modification 45 will have beneficial equalities impacts by:

- clarifying the respective roles and responsibilities of the SLWP Boroughs, the EA and waste site operators in terms of monitoring and reporting on breaches of planning obligations, enforcement notices and/or waste permitting conditions; and
- setting out a commitment for the SLWPO Boroughs to monitor any enforcement action taken against waste operators to ensure that existing waste facilities do not cause harm to the environment or local communities. This will be published as part of the Waste AMR.
- making use of powers laid down in planning legislation for local authorities to take enforcement action where development has been carried out, either (i) without planning permission, and / or consent; where a condition on a planning permission has not been met; and where a planning obligation has not been delivered; and
- ensuring that planning enforcement officers within each partner borough will investigate and enforce alleged planning breaches related to waste developments having regard to the relevant legislation.

4.8 Modification 46 will have potential benefits for all equalities target groups by ensuring that the SLWP boroughs continue to engage with all relevant Duty to Cooperate stakeholders in a constructive, an active and an ongoing basis on any relevant strategic matters. with each other and with all other

relevant 'duty to cooperate' bodies to monitor the plan and the coordinate any necessary contingency actions to ensure that the plan's strategic objectives, policies and targets are met:

Sites and Figures

4.9 Modifications 51, 53-56, 59, 62, 65-69, 72, 75-79, 84, 89-90, 98, 101-102, 104, 108, 110-111, 113 and 117 are expected to have beneficial impacts with respect to older people; young people and children; disabled people; and people with a limiting long-term illness by setting out a strengthened commitment for new or intensified waste developments to "avoid harm" to the living conditions of the occupants of residential properties in the vicinity of each of the 30 allocated sites listed, especially with regard to air emissions, HGV movements and noise impacts.

4.10 Modification 63 is assessed as having strongly beneficial impacts on Gypsies and Travellers by requiring proposed waste developments to maintain residential amenity for the occupiers of this allocated gypsy and traveller site.

4.11 Modifications 81 and 96 will have some potential benefits with respect to older people; young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by including the aim of 'contributing positively' to the residential amenity of those properties in the vicinity of the respective sites (M9 and M15) as one of the 'issues to consider'.

4.12 Modification 86 is assessed as having strongly beneficial impacts on Gypsies and Travellers by ensuring that any proposed waste facilities on site M12 will protect the residential amenity for occupants of gypsy and traveller accommodation as well as built dwellings ('bricks and mortar').

4.13 Modification 120 is expected to have significant benefits by significantly expanding the scope of future monitoring and reporting on SLWP objectives and targets in order to address specific issues of concern highlighted by objectors and the Inspector, principally around minimising the adverse impacts of air pollution, dust, noise and HGV movements associated with waste operations, and by identifying the actions to be taken in the event that SLWP objectives and targets are not being delivered

Next Steps

4.14 This EqIA Addendum Report is being published for final public consultation alongside the Schedule of Modifications and the sustainability appraisal (SA) Addendum Report over a 7 week period from 14 July to 2 September 2022. Copies are available at:

- www.sutton.gov.uk/wasteplan

4.15 Adoption of the final SLWP 2022-2037 is expected later in 2022 subject to Full Council approval in each of the four partner Boroughs.

