

DRAFT SOUTH LONDON WASTE PLAN

Schedule of Consultees And Representations on The Main Modifications Consultation (September 2022)

SCHEDULE OF CONSULTEES

Consultees Nos. from the previous Draft South London Waste Plan stage have been preserved. However, not all consultees responded to the Main Modifications, which is why there are some gaps in the consultee numbers below.

No	Name
Con1	The Mayor of London
Con4	Natural England
Con5	National Highways / Highways England
Con18	Day Group Ltd (Firstplan as agent)
Con19	D B Cargo (Firstplan as agent)
Con21	Wimbledon Park Residents Association
Con32	Merton Conservatives Group
Con35	777 Demolition & Haulage (BPP Consulting)
Con37	Environment Agency
Con38	Surrey County Council
Con40	SUEZ
Con42	Viridor
Con44	Historic England
Con48	Resident MS
Con49	The Coal Authority
Con50	Gloucestershire County Council
Con51	Ministry of Metals
Con52	Reigate and Banstead Borough Council
Con53	Kingston Talking Newspaper
Con54	Social Media Representor 1
Con55	Social Media Representor 2

SCHEDULE OF REPRESENTATIONS

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
General Comments					
1	Con1: Mayor of London	N/a	General comment	<p>Thank you for consulting the Mayor of London on the proposed Main Modifications to the draft South London Waste Plan (SLWP) following the Examination Hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make more detailed comments on his behalf which are set out below.</p> <p>The Mayor already provided comments on the Regulation 19 version of the draft SLWP on 22 October 2020 (Ref: LDF36/SLWP02/HA02) in which he made it clear that as written the Publication Stage version of the SLWP was not in general conformity with the Intend to Publish London Plan for two reasons. Firstly, it failed to secure compensatory capacity of at least equivalent throughput to that which would be lost as a result of draft Policy WP3(c) and secondly, for a failure to appropriately implement the waste hierarchy in accordance with Policy SI9 C of the Intend to Publish version of the London Plan.</p> <p>At the request of the South London Waste boroughs the Mayor issued a letter to them setting out the Mayor's opinion on the general conformity of the draft waste plan on 21 April 2021(Ref: LDF36/SLWP02/LP03/HA01). The Mayor made it clear that the general conformity issues raised in his Regulation 19 response remained and were still valid.</p> <p>Working in collaboration to resolve the general conformity issues, a Statement of Common Ground (SCG) was agreed on 3 and 4 August 2021 between the GLA and South London Waste Boroughs. The SCG contains proposed modifications that address all the general conformity concerns raised by the Mayor in his earlier correspondence. Following the completion of the agreed SCG, the South London Waste boroughs, once again, requested a letter from the Mayor for his opinion on the general conformity of the draft waste plan in light of the proposed modifications within it. This letter was issued on 26 August 2021 and stated that the modifications</p>	Noted.

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				<p>proposed in the SCG sufficiently address the general conformity issues that had been raised and as such the Mayor was of the opinion that if implemented as agreed the draft Plan would be in general conformity with the London Plan 2021 (LP2021).</p> <p>The Mayor is pleased that the current consultation on the main modifications to the draft Waste Plan incorporate all the changes which were agreed as part of the SCG.</p> <p>Detailed comments on the proposed main modifications to the draft SLWP are set out in the table below [These are below under the relevant MM].</p>	
2	Con 4: Natural England	N/a	No comment.	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 14th July 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk</p>	Noted.
3	Con 5: National Highways	N/a	General comment and support	<p>Thank you for your e-mail of 14th July 2022 inviting National Highways to comment on the above consultation and indicating that a response is required by 2nd September 2022.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network. The strategic road network is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-</p>	The Councils note that National Highways are “satisfied that this consultation on Proposed Main Modifications to the South London Waste Plan will not materially affect the safety, reliability and / or operation of the SRN”. Any future proposals on existing waste or for new sites will require a planning application and the transport

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				<p>term operation and integrity. We are specifically concerned with any proposals which have the potential to impact the A3, the A23 and the M25 which experience congestion at peak times.</p> <p>As stated in our responses to previous consultations on the South London Waste Plan, we would be concerned if any material increase in traffic were to occur on the SRN as a result of any planned growth without careful consideration of mitigation measures. It is important that the Waste Plan is not progressed without appropriate infrastructure in place. In general, we support proposals that consider sustainable measures which manage down demand and reduces the need to travel. The transportation of waste has the potential to generate a significant number of heavy goods vehicle (HGV) trips. Although individual sites might not have a significant impact, cumulatively, developments could still have the potential to impact the SRN, particularly road safety. In general we would be concerned with an increase in slow moving HGVs accessing the SRN and the resulting potential impact to the safe and efficient operation of the SRN. We support policy WP5 and WP9 which are generally in line with what is set out above, in particular regarding road safety.</p> <p>We support proposals that promote alternatives to road based transport, such as transportation of waste via rail and water. In addition to further minimise potential impacts to the SRN we would look to site operators to identify opportunities to reduce trips during peak periods; this might be through construction and operational management plans to support individual proposals.</p> <p>The main modifications, which this consultation specifically relates to, do not appear to make any substantial changes to the proposed policies map. We have noted that there have been a couple of listed removal and additions of specific waste sites to the plan, but these should not of themselves cause any additional impact, and any changes to individual sites may be subject to the future planning consultations for specific sites if/when they come forward. We have no other comments to make regarding the proposed main modifications to the South London Waste Plan 2022 – 2037.</p>	<p>impacts fully assessed in accordance with the policies and the Development Plan.</p>

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				We are satisfied that this consultation on Proposed Main Modifications to the South London Waste Plan will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF 2019, particularly paragraphs 108 and 109).	
4	Con18: Day Group	N/a	Support	<p>Other MMs have been proposed to Policies and supporting text previously commented on. These have been reviewed and do not raise issue for Day Group. On this basis the proposed Main Modifications are in general terms supported and considered to be 'sound'.</p> <p>It is highlighted for completeness that part (a) of Policy WP3 Existing Waste Sites states: "The sites set out on pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses". From review of the tracked changes document and the 'Additional Modifications' document it does not appear that this page number referencing have yet been identified for updating. Given the changes to the Plan it is assumed the page numbering for the identified sites will change and that this reference in WP3 will need to be updated. This same referencing will also need to be updated at Objective 3 and para 5.23. It is key that the correct page number referencing within Policy WP3 and elsewhere is updated to ensure the SLWP is clear on the safeguarded sites being referenced. It is assumed this will be caught by way of final edit of the SLWP.</p> <p>Changes to the Policies Map published as part of the consultation have also been reviewed. Proposed changes to the Policies Map to include the Safeguarded Site "C4, Day Aggregates Purley Depot, Approach Road, Croydon" are fully supported and correctly reflects the proposed safeguarded status of the site within the SLWP.</p> <p>I trust this response in respect of the proposed Main Modifications with particular reference to the issues previously responded on by Day Group is helpful. I would be grateful for confirmation of receipt of these representations and confirmation that they have been duly made.</p>	<p>Agree.</p> <p>Formatting checks will be carried about when the final version of the document is prepared. The Councils will ensure correct page numbers and paragraphs numbers are included in the final version.</p>

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5	Con19: D B Cargo	N/a	General comment	<p>In addition DB Cargo responded on the following Policies in their previous representations.</p> <ul style="list-style-type: none"> • Policy WP3 - Existing Waste Sites • Policy WP8 - New Development Affecting Waste Sites <p>It is highlighted for completeness that part (a) of Policy WP3 Existing Waste Sites states: "The sites set out on pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses". From review of the tracked changes document and the 'Additional Modifications' document it does not appear that this page number referencing have yet been identified for updating. Given the changes to the Plan it is assumed the page numbering for the identified sites will change and that this reference in WP3 will need to be updated. This same referencing will also need to be updated at Objective 3 and para 5.23. It is key that the correct page number referencing within Policy WP3 and elsewhere is updated to ensure the SLWP is clear on the safeguarded sites being referenced. It is assumed this will be caught by way of final edit of the SLWP.</p>	<p>Noted.</p> <p>Formatting checks will be carried about when the final version of the document is prepared. The Councils will ensure correct page numbers and paragraphs numbers are included in the final version.</p>
6	Con21: WPRA	N/a	Objection	<p>Executive Summary</p> <p>The draft 2022 South London Waste plan did not properly take account of the toxic effects of air pollution despite the large numbers of waste carrying HGV's on local roads. Instead it safeguarded the waste sites adopted in the 2012 South London Waste even though some of these were known to be causing harm to human health. As a result it was unsound. Quite a few of the proposed modifications to the 2022 plan place strong constraints on the air pollution that can be generated by new developments or the intensification of existing sites.</p> <p>However, these do not apply to the existing sites. These modifications should be changed so that these air pollution conditions apply to the existing sites when they are subject to their annual review. The Boroughs should also be required to assess air quality on the affected roads and also develop a clear strategy for the closure of failing sites and the search for new less polluting sites. Without these changes waste processing in south</p>	<p>Disagree. Boroughs are required to safeguarded existing waste sites in accordance with London Plan Policy SI 9 and the SLWP has done so (notwithstanding the release of some sites where evidence showed these were no longer operational or operates were planning to move capacity or cease operations).</p> <p>As discussed during the hearing sessions there are a number of organisations and mechanisms for managing</p>

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				<p>London will not have properly taken account of air pollution and so it will be unsound.</p> <p>1. The draft South London Waste Plan 2022</p> <p>[1.1] Most of the sites designated in the South London Waste Plan 2012 are now processing waste. In 2012 the health consequences of air pollution were not so widely understood and so it is perhaps not surprising that this played essentially no part in the assignment of the waste sites. It might have been hoped that the consequences for air quality and traffic congestion were assessed when the sites applied for planning permission, but this was not the case. Thus the way waste is currently processed in South West London has not taken account of air pollution despite the large number of waste carrying HGV's that are travelling on the roads and that it is well known that on average about 30 people die every day as a result of air pollution in London.</p> <p>[1.2] By 2022 the consequences of air pollution were well known. Indeed, in our previous submissions, we listed the national and local planning guidelines on air quality in enforce 2022. It was well known that the roads around some waste processing sites exceeded the EU guidelines, for example Gap, Haydon, and Durnsford Roads as well as Plough Lane along which the waste carrying HGV's travel. from and to Weir Road in Merton.</p> <p>[1.3] One might have hoped that the South London Waste Plan 2022 would assess the air pollution due to the waste processing sites introduced in the 2012 plan. In the 2022 draft plan a waste site was only assessed to be causing air pollution if it was close to an air focus area! Indeed a site, which was distant from such an area, could be found to generate little air pollution even though the roads along which the waste carrying HGV's travel were known to have very high levels of air pollution! At the hearing in front of the inspectors no one was prepared to defend this approach. As we said at the hearing, and in our submitted documents, the 2022 draft South London Waste Plan was unsound and could not be defended. The national and local planning guidelines that underlie our comments, including those in this document, are given in our previous submissions and so we will not repeat them here.</p>	<p>waste sites, including the London Plan, the SLWP, the Environment Agency and the Boroughs' Planning Enforcement and Environmental Health teams. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to close down operational waste sites and, even if a waste safeguard were removed from a site through a plan-led process, it does not automatically follow that the sites would cease operations.</p> <p>The MMs have sought to explain these different agents and their responsibilities and this is clearly set out in MM47. This includes who is responsible for monitoring existing waste sites as the draft SLWP, when adopted, cannot retrospectively apply policies to consented schemes or operational sites.</p> <p>Any sites that proposes redevelopment or intensification will have to satisfy the policies of the SLWP, Boroughs' local plans and the London Plan, all of</p>

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				<p>[1.4] One problem was that the air pollution, or the traffic levels, on the relevant roads due to waste carrying HGV's were not measured by the Boroughs. As such it was difficult for the Boroughs to identify which waste sites were causing excessive air pollution and harm to local residents. As we pointed out, with some foresight, these measurements could have been achieved as part of the usual monitor procedures. We carried out a survey and found that during working hours on each weekday there were about 600 HGV's going in and out the sites on Weir Road. Furthermore the large majority of these were going to and from sites to the south of Weir Road and so they were taking their waste unnecessarily through Wimbledon. Hence there were very large numbers of HGV's generated by the Weir Road sites causing significant problems with air quality, a fact that was rather obvious to local residents.</p> <p>[1.5] The 2022 plan safeguarded many of the 2012 sites. It proposed that they could be intensified rather than any new sites allowed. Thus the mistakes of the 2012 plan were perpetuated into the far future. Taking account of air pollution and traffic journeys the 2022 plan should not have safeguarded those sites that generated excessive air pollution, such as those in Weir Road. Indeed it should have begun the process of finding alternative sites to compensate for the resulting lack of waste provision when the failing sites were closed. Our objections were implicitly referred to in the questions of the inspectors on the 2022 draft plan. As a result they were discussed at the hearing in September 2021. A number of modifications to the 2022 plan were subsequently made which involve air quality.</p> <p>An assessment of the air pollution and traffic congestion was not carried out for the waste sites put forward in the 2012 plan. Nor were such assessments carried out when the sites applied for planning permission or in the 2022 plan. This was despite the fact that some of these sites were known to be causing harm to the health of the local residents near the roads along which the waste carrying HGV's travel. Instead the sites put forward in the 2012 plan were safeguarded in the 2022 plan and new sites were</p>	<p>which includes policies on air quality. The WPRA have made representations relating to air quality at all stages of the SLWP production, including evidence given during the EiP and discussions with Merton Council outside of the formal stages. The Councils have addressed these extensively and these responses are available in the Examination Library. However, further MMs have been put forward to address the concerns of the WPRA. As such, it is considered that the SLWP is robust and sound. In addition, the air quality policies of the SLWP have been subject to SA /SEA at every stage of the Plan production, including the Main Modifications, and the Boroughs are more than satisfied that they are robust and sound.</p>

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				strongly discouraged. In this way the waste sites causing harm to human health were perpetuated into the far future	
7	Con32: Merton Conservatives Group	N/a	General comment	<p>Merton Conservatives support the modifications to the SLWP 2022-2037.</p> <p>However, we support a more ambitious target for recycling, especially items which are currently sent to land fill. We support the target of being net self-sufficient in terms of waste generation and waste management for all types of waste and feel that this can be achieved before 2036.</p> <p>Additionally, the plan should contain clauses to encourage the boroughs to progressively find and designate suitable safeguarded waste sites which are further away from residential areas and closer to where the waste is arisen from or transported from, such as near the A3 and major arterial roads (e.g. Red routes). The boroughs should set tough air quality standards for the areas around existing waste sites and work with the waste operators to reduce the harm they are causing to residential areas, for example air pollution, noise, road damage, and damage to vehicles and buildings. We support the call of many residents and other groups for stronger protection for those who live near to waste sites.</p>	<p>Noted. As set out in response to previous representation at the draft Plan stage, whilst the four SLWP boroughs support the ambitious targets for the recycling of municipal waste set out in the Mayor's Environment Strategy and the London Plan 2021, this is not a target that can be delivered by a land-use plan prepared by a joint waste planning authority (although the safeguarded of waste sites does support this ambition, along with policies that support the circular economy). As the joint waste disposal authority, the South London Waste Partnership is responsible for waste collection and disposal within the four boroughs, and is therefore in a position to promote higher recycling rates.</p> <p>The Boroughs consider that the proposed modifications to the Monitoring table address the issues you have raised in regards to air quality. In particular, Indicator 5.7 states that "<i>Consistent and significant failure to meet relevant air quality targets over successive</i></p>

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					<i>monitoring periods will trigger a review of the SLWP's policies and safeguarded sites.</i>
8	Con37: Environment Agency	N/a	General comment	<p>Thank you for consulting the Environment Agency on the main modifications following the Examination in Public. We welcome the proposed modifications and the new South London Waste Plan which will help to ensure waste management sites and infrastructure are designed and maintained to high environmental standards. We support the planning policies to ensure waste management activities are enclosed in quality buildings and are operated well to protect and enhance the environment.</p> <p>Environmental Permitting and Planning As you are aware certain waste management activities also require a permit or exemption from the Environment Agency. The permitting regime is regularly reviewed and environmental requirements, standards and tracking systems are likely to evolve over the lifetime of this plan. We will keep you updated on any major changes to ways of working on environmental permitting to help inform any updates to the SLWP policies/guidance where necessary. Environmental management : Environmental permits - detailed information - GOV.UK (www.gov.uk)</p> <p>We are keen to continue to work in partnership with you to ensure waste management sites across the plan area do not cause environmental issues and welcome joint working to share information on the status of waste management sites. Environmental incidents should be reported to our incident hotline Report an environmental incident - GOV.UK (www.gov.uk) We support early interventions to address any poor performing waste management sites and joined up multi agency working between Environment Agency, London Fire Brigade, Health and Safety Executive and Local Planning Authorities'.</p>	Noted.

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				We continue to encourage early and joined up pre application discussions for sites requiring environmental permits and planning consent. Applicants should contact us at kslplanning@environment-agency.gov.uk for pre application advice.																	
9	Con38: Surrey County Council	N/a	General comment	<p>Thank you for consulting Surrey County Council as the Minerals and Waste Planning Authority (MWPA) in relation to the proposed main modifications to the South London Waste Plan 2022 – 2037.</p> <p>Please note that we have no comments to raise at this stage.</p>	Noted.																
10	Con40: SUEZ	N/a	Factual update	<p>Thank you for the opportunity to comment on the Main Modifications to the Draft South London Waste Plan (SLWP).</p> <p>Appendix 3 It is noted that the description for Site 126, Benedict's Wharf listed at Appendix 3, is not currently accurate.</p> <p>The description for Site 126 taken from the 'Plain Text Version' of the South London Waste Plan Draft for Submission to Government Consultation Document, dated September 2020 is provided at Figure 1.</p> <p>Figure 1: Extract from Appendix 3 to the Plain Text Version of the South London Waste Plan showing inaccurate description for Site 126, Benedict's Wharf</p> <table border="1"> <thead> <tr> <th>Site No</th> <th>Site Name</th> <th>Location</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>101</td> <td>Rentokil Initial Services Ltd</td> <td>Merton</td> <td>No longer managing waste in the area according to Environment Agency</td> </tr> <tr> <td>126</td> <td>Benedict's Wharf Transfer Station</td> <td>Merton</td> <td>Closed and capacity transferred to Site S12: Country Waste Skip Hire</td> </tr> <tr> <td>A</td> <td>SafetyKleen</td> <td>Croydon</td> <td>Safeguarding carried forward as</td> </tr> </tbody> </table> <p>This description shown in Figure 1 states that the Benedict's Wharf site is closed. In fact, the Benedict's Wharf site remains operational at the present time.</p>	Site No	Site Name	Location	Description	101	Rentokil Initial Services Ltd	Merton	No longer managing waste in the area according to Environment Agency	126	Benedict's Wharf Transfer Station	Merton	Closed and capacity transferred to Site S12: Country Waste Skip Hire	A	SafetyKleen	Croydon	Safeguarding carried forward as	<p>Agree.</p> <p>The Councils consider this to be a factual correction.</p>
Site No	Site Name	Location	Description																		
101	Rentokil Initial Services Ltd	Merton	No longer managing waste in the area according to Environment Agency																		
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				<p>Since the Examination of the South London Waste Plan, Veolia Group became the owners of SUEZ in January 2022, following a hostile takeover of SUEZ Group. In the UK, the Competition and Markets Authority (CMA) have investigated the effect of the purchase on UK markets. In August 2022, the CMA confirmed that the two companies coming together in the UK would result in a lessening of competition and that therefore, our UK SUEZ business should be sold in its entirety to maintain competition in the UK waste and recycling market.</p> <p>Due to the uncertainty of our future owners at this time and their proposed investment strategy for the business, SUEZ has taken the decision to put the sale of our Benedict's Wharf site on hold until the ownership of SUEZ is settled. It is therefore proposed to amend the description for Site 126 in Appendix 3 to read:</p> <p><i>Site 126: This 355,000tpa Permitted facility may now close following the grant of planning permission to allow residential development, with capacity transferred to Site S12: Beddington Resource Recovery Facility.</i></p>	
11	Con 48: Resident MS	N/a	General comment	<p>Thank you for the opportunity to comment on the documents published at https://www.sutton.gov.uk/-/main-modifications</p> <p>Following scrutiny of the Schedule of Main Modifications, Sustainability Appraisal on the Main Modifications, & Equalities Impact Assessment on the Main Modifications, it is apparent a great deal of work has been undertaken to ensure the draft South London Waste Plan has been modified to take into account the concerns of both objectors & the Planning Inspector. Full credit should be given to the Councils' & other staff involved in assessing whether the Modifications are likely to meet the Government's tests for soundness in terms of positivity, robustness, effectiveness, & consistency.</p> <p>Of the supporting documents also published on the website, the "Changes to the Policies Map" could benefit from further proof-reading.</p>	Noted and thank you.

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12	Con 49: The Coal Authority	N/a	No comment	<p>Thank you for your email below regarding the Proposed Main Modifications to the South London Waste Plan 2022 to 2037.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, London Borough of Sutton lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	Noted.
13	Con50: Gloucestershire County Council	N/a	No comment	M&W officers have reviewed the consultation information and have no further comments to make.	Noted.
14	Con53: Kingston Talking Newspaper	N/a	General comment	I think you do really need to list any major changes that might affect residents, and publish that. It has to be said that there is going to be an increase in those with no internet as the cost of living increase bites, so more than ever all consultations need to also contain some other methods of returning views, such as telephone etc.	Noted.
15	Con54: Social Media Representor 1	N/a	General comment	Found it, very, erm padded with words and pictures. But going through it, one question so far I have, a small question, but yet a poignant one given the towns swimming pool: "95% of construction, demolition and excavation waste to be recycled by 2020" How are you doing on that?	Noted. The target of 95% stems from London Plan Policy SI 7 'Reducing waste and supporting the circular economy'. However, the policy does not contain a date, as appeared in the previous stage

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					<p>of the SLWP, so this had been amended to ensure consistency with the London Plan in MM3 and MM6 and in turn is supported by Policy WP6.</p> <p>To help achieve this target, construction and demotion waste should be reused, recycled and recovered so it can be put to use, preferable onsite or in local projects. Similar excavation waste should be put to a beneficial use. This could, for example, include using the material as a resource within the construction of the proposed development, or in other local construction projects, or using the material in habitat creation, flood defences or landfill restoration. This will support the circular economy objectives of the SLWP and the London Plan.</p>
16	Con54: Social Media Representor 1	N/a	General comment	Another question: "The strategic approach and policies in the London Plan are based on the forecast amount of waste that needs to be planned for" I see the construction forecast chart (Demolishing Croydon are they!). No household or Business forecasts?	Noted. The SLWP contains the forecast waste projections for each waste stream, including household and business (referred to in the SLWP as commercial waste) and this is set out in Figures 7, 8, 11, and 13-17. These are updated by MM5.1, MM6.1, MM7.1, MM8,

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					MM11, MM14.1. Further details on the forecasts is set out in the SLWP Technical Report, which is available in the Examination Library online.
17	Con54: Social Media Representor 1	N/a	General comment	Slowly going thru it and another question "Other Waste Streams: The other waste streams which the Government requires to be planned for are: Hazardous waste, Low Level Radioactive waste, Agricultural waste and Wastewater" Wastewater would include sewage - yes?	Agree. Yes, this includes sewage.
18	Con54: Social Media Representor 1	N/a	General comment	Q: "Furthermore,... an appropriate and desirable option. Examples include the transfer of hazardous waste to specialist treatment facilities in Cambridgeshire & Peterborough or the importation of household, commercial and industrial waste from Kent" Why no breakdown figures?	Noted. Full details of waste movements are set out in the SLWP Technical Report, which is available online in the Examination Library, This is updated through the Waste Authority Monitoring Report. This information is also publicly available in the Environment Agency Waste Data Interrogator, which is where the Boroughs source the information.
19	Con54: Social Media Representor 1	N/a	General comment	Q: "the South London Waste Plan Technical Report 2019 has used Environment Agency data for five years to 2017 "Why isn't this revised or scaled via trending increase in homes/development etc? More so given Croydon's surge in construction waste since this timeframe!	Disagree. When the 2019 Technical Report was produced the latest available data was to 2017. This data has been updated to 2019, as set out in the Schedule of Main Modifications. Furthermore, this data will be updated and published each year in the Waste Authority Monitoring Report. This information is also

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					publicly available in the Environment Agency Waste Data Interrogator, which is where the Boroughs source the information.
20	Con54: Social Media Representor 1	N/a	General comment	Q: "the 20,W3 London Plan requires major development, such as new waste facilities, to be net zero carbon and this is a key issue for the South London Waste Plan."Any data/monitoring approach that can be shared upon this? Details matter over words.	As set out in the SLWP, the London Plan requires the London Plan requires major development, such as new waste facilities. The policies in the SLWP support the delivery of zero carbon development, specifically through WP6 and WP7. In addition, individual borough local plans will also contain policies on achieving zero carbon development. MM34, MM35 and MM36 provides further details in relation to zero carbon developments.
21	Con54: Social Media Representor 1	N/a	General comment	"London Plan proposals to move towards a circular economy, to keep products and materials circulating within the economy at their highest value for as long as possible. Leasing, sharing, reusing, repairing and re-manufacturing" But not repairing Swimming pools?	The Kingsfisher Leisure Centre redevelopment was approved by Kingston's Planning Committee in May 2022. The demolition phase of the Kingfisher Leisure Centre (including the swimming pool) will be required to comply with a Site Waste Management Plan to ensure the Development Plan promotes circular economy outcomes and

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					supports the aim for net-zero waste in accordance with Policy SI7 of the London Plan (2021).
22	Con54: Social Media Representor 1	N/a	General comment	<p>Page 21 - the target's set and strategy are flawed as it has no actualities feeding into it and is just an accountancy fantasy without that. Let alone, Your own forecasts for Croydon already exceed targets. Why is this not being fixed? As seriously flawed to fail.</p> <p>I've only got as far as page 21 - but then I used to review plans/technical documents at the highest level for bigger things in past work, so I'll just do a document and pass it on to somebody more suitable to champion or I'm going to fill twitter up very quickly. You're welcome</p>	<p>Disagree. The SLWP contains the forecast waste projections for each waste stream, Further details on the forecasts is set out in the SLWP Technical Report, which is available in the Examination Library online.</p> <p>Furthermore, this data will be updated and published each year in the Waste Authority Monitoring Report. This information is also publicly available in the Environment Agency Waste Data Interrogator, which is where the Boroughs source the information.</p>
23	Con54: Social Media Representor 1	N/a	General comment	Given that the feed-in data is not updated, and the models have some flaws (at least from my 10 min glance) I would ask, what is being done about that first as this is just looking like an accountancy magic act with a new date.	<p>Disagree. The SLWP contains the forecast waste projections for each waste stream, Further details on the forecasts is set out in the SLWP Technical Report, which is available in the Examination Library online.</p> <p>Furthermore, this data will be updated and published each year in the Waste Authority</p>

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					Monitoring Report. This information is also publicly available in the Environment Agency Waste Data Interrogator, which is where the Boroughs source the information.
24	Con54: Social Media Representor 2	N/a	General comment	Is there a plain English version? The documents are very technical.	The current consultation focusses specifically on the Schedule of Main Modifications and associated documents. However, a track-changed version of the document was also provided so the changes could be read in the context of the wider plan.
Main Modifications					
25	Con52: Reigate and Banstead BC	MM4	Support	<p>Thank you for the opportunity to comment upon the draft South London Waste Plan – proposed main modifications. We have the following comments regarding the proposed modifications.</p> <p>Reference 4 page 10 – We welcome the reference to the planned closure of the Redhill Landfill site, and alternative arrangements for waste previously managed by the Redhill site. We consider this modification has been positively prepared.</p>	Noted.
26	Con1: Mayor of London	MM5	Support	The Mayor welcomes the commitment from the boroughs to monitor the cross-boundary movements of waste.	Noted.
27	Con1: Mayor of London	MM6.1	Support	The Mayor welcomes the proposed modification which will ensure that the approach is consistent with Policy SI 7A of the LP2021 and that the proposed targets for demolition and excavation waste will be met.	Noted.

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28	Con1: Mayor of London	MM7	Support	The Mayor welcomes the proposed modification which updates reference to the LP2021 and provides a clear commitment to plan for net self-sufficiency. Also welcome is the proposed Objective 7 to support the movement of waste as far up the waste hierarchy as practicable and proposed Objective 8 to minimise waste movements.	Noted.
29	Con1: Mayor of London	MM9	Support and suggested change	The proposed new paragraphs seek to restrict new waste sites from coming forward with the main focus for future waste management proposals being directed towards existing safeguarded waste sites. It is clear that the intention to do so, should not stifle things like advances in new waste technologies, and this is welcomed. But the South London Waste Boroughs should introduce greater flexibility so that opportunities to promote and support waste management activities further up the waste hierarchy are supported and given due consideration. In light of this it is considered that the proposed modification should be reviewed again and amended accordingly.	Disagree. The Council's consider that the modifications introduce the required flexibility that strikes the right balance between ensuring meeting waste targets, ensuring land isn't sterilised by unnecessary designations and still allows for innovation through the development and intensification of existing sites or the delivery of new sites for compensatory provision or the delivery of new sites where the policy tests of the Plan are met. Furthermore, MM10 specifically supports new sites that are propose to manage waste sites as high up the waste hierarchy as practical, alongside policies that support and promote the circular economy.
30	Con51:	MM9 MM10	Object	Our representation is on a number of proposed Main Modifications which individually and together introduce a very strong presumption against any	Disagree. As set out in MM9 the SLWP has sought the right

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	Ministry of Metals	MM12 MM13 MM16		<p>new waste development across the whole South London Waste Plan area, particularly on sites that are currently not in a waste use (and safeguarded for such use).</p> <p>These are:</p> <ul style="list-style-type: none"> • MM 9: new paragraphs after para 5.8; • MM10: new criteria added to Policy WP1 clause (d) to qualify 'normally'; • MM12: new sentence confirming new sites (assume to mean applications for waste development on sites not currently in waste use or safeguarded as such) will not be supported unless there are 'exceptional circumstances' defined in Policy WP2(e); [it appears this refers to WP2 amended clause d] • MM13: Introduction of clause requiring demonstration of 'exceptional circumstances' defined in Policy WP2(e); [it appears this refers to WP2 amended clause d] • MM16: new criteria in Policy WP2 clause d. <p>As currently written these proposed Main Modifications are not sound on the following basis:</p> <p>Positively prepared: While the Plan identifies that existing and forecast needs can be met through existing capacity, it effectively rules out any sites not currently in a waste use coming forward and being permitted for waste use over the whole Plan period.</p> <p>While the proposed new paragraphs following para 5.8 introduce a caveat that applications for permission for waste use on new sites will not 'normally' be permitted, explained as an attempt to 'strike a balance' and 'giving some flexibility' for new sites to come forward (with some helpful examples provided), the criteria included in these paragraphs and in the proposed modifications to Policy WP1 (d) and Policy WP2 (d) introduce restrictive tests that will be very difficult, if not impossible, to meet.</p>	<p>balance between the competing needs of waste and industrial uses. Whilst the Boroughs acknowledge the policy tests are tough they do not except that they are impossible, as asserted. The SLWP has provided robust evidence that there is sufficient capacity across existing safeguarded sites to exceed the apportionment set out in the London Plan which supports the approach taken.</p> <p>The SLWP therefore achieves the right balance between meeting waste targets, ensuring land isn't sterilised by unnecessary designations and still allows for innovation through the development and intensification of existing sites or the delivery of new sites for compensatory provision or the delivery of new sites where the policy tests of the Plan are met.</p> <p>The Boroughs consider that the SLWP in general conformity and which is consistent with the Mayor of London's view, who has previously issued a Letter of Conformity (available in the Examination Library Ref 'OTHE03') and has raised no</p>

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				<p>National Planning Policy Framework (NPPF) paragraph 16 clause (b) defines positive plan preparation as being 'in a way that is aspirational but deliverable'. The Plan as modified by the Main Modifications would not effectively provide for new sites coming forward and include overly restrictive criteria, and so could not be considered to be either aspirational or deliverable.</p> <p>The proposed Main Modifications are not positively prepared and therefore are not sound as written.</p> <p>Robust: The Plan identifies that capacity at existing and safeguarded waste sites is sufficient to meet forecast needs. There may however be circumstances where a new site proposed for waste development in South London is acceptable in land use terms and preferable to existing safeguarded sites due to its location, design, relative environmental and amenity impact. The Plan should provide flexibility to accommodate such development, being responsive to changes in the commercial and technological environment as well as enabling opportunities for sustainable development (NPPF para 16 clause a).</p> <p>The Main Modifications seek to introduce overly-restrictive criteria reflecting and reinforcing this assumption, and are therefore not considered to be robust or justified, and so are not sound as written.</p> <p>Effective: The proposed criteria in Policy WP1 d (MM10) are overly restrictive, with the 'and' between clauses ii to v meaning all will need to be met. Clause ii in particular, requiring demonstration that need cannot be met 'elsewhere in London', is far too restrictive and will be impossible to demonstrate and so is not deliverable and not sound. This appears to be a reference to provision of capacity in London as whole in Policy SI9 (c) of the London Plan – but that policy specifically applies to provision of compensatory capacity for loss of safeguarded sites, and not permitting of new sites for waste management use. Therefore the two issues have been conflated unnecessarily. Clause iii requiring demonstration that intensification is not</p>	<p>objections to general the approach of MM10.</p>

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				<p>possible is also not sound, as while there may be a theoretical potential to intensify (based on site area, type and existing throughput) the actual delivery of any intensification will be dependent on a range of factors likely to be outside the control of an applicant for a new site (and the planning authority). This includes the willingness or ability of a particular operator to invest in a site, service a greater throughput/catchment, and access additional waste streams.</p> <p>The requirement to demonstrate 'exceptional circumstances' (MM12 and 13), defined in the proposed criteria in Policy WP2 d (MM16) is also not deliverable for the same reasons.</p> <p>The proposed Main Modifications therefore are not effective and not sound as written.</p> <p>Consistency with national policy: The National Planning Policy for Waste (NPPW) paragraph 5 applies to plan-making and requires planning authorities to assess suitability of sites for new or enhanced facilities against a range of criteria. Paragraph 7 refers to determination of waste planning applications and sets out considerations for planning authorities including the locational criteria in Appendix B. The South London Waste Plan should provide flexibility for proposals for waste uses on new sites to be considered on their merits and against deliverable criteria that would enable development on suitable sites.</p> <p>NPPF paragraph 16 (as referred to above) requires that Plans should 'be prepared positively in a way that is aspirational but deliverable' (clause b) but the Plan and the proposed Main Modifications (especially MM10 & MM16) are neither (for the reasons cited above).</p> <p>NPPF paragraph 81 requires policies and decisions to help create the conditions in which business can invest, expand and adapt. By introducing overly-restrictive tests and criteria,</p>	
31	Con21: WPRA	MM9	Object	[3.2] The modifications should replace the requirement of air quality neutral for a new site by the requirement that the new site would substantial reduce	The air quality policies of the SLWP, and the boroughs'

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
				<p>air pollution by taking into account that it replaces sites that are causing damage to human health.</p> <p>Specifically change MM9 so as to include this justification for a new site. This is consistent with the modification MM7 i.e. Objective 8. Similarly change MM10 and MM21.</p> <p>[Representation repeated below under MM10 and MM21]</p>	<p>individual Local Plans and guidance documents, would be considered alongside policy WP1, if a new waste site were proposed. As such, the boroughs do not consider it is necessary to add a specific air quality criteria to Policy WP1 or its justification/amplification as the Plan should be read as a whole.</p>
32	Con1: Mayor of London	MM10	Support and suggested change	<p>The proposed modification is welcome as it provides more guidance and clarity on how proposals for new waste sites will be approached and considered. The Mayor is pleased that the management of waste as high up the waste hierarchy is included as one of the criteria for new waste sites and is consistent with Policy SI 8E2 of the LP2021. Advances in waste technologies may mean that existing waste sites are no longer suitable, and this could be included as an additional element. This point is raised in the proposed addition to paragraph 5.8 and could be reflected in Policy WP1 (d) too for consistency.</p>	<p>Noted.</p> <p>If existing sites were no longer suitable there are already mechanisms within the Plan for relocation such as comprehensive redevelopment of the site, by providing compensatory provision on an alternative site or new sites through the exiting provisions of WP1, WP2 and WP3. As such, the Council's consider it unnecessary to add this as a specific provision.</p>
33	Con21: WPRA	MM10	Object	<p>[3.2] The modifications should replace the requirement of air quality neutral for a new site by the requirement that the new site would substantial reduce air pollution by taking into account that it replaces sites that are causing damage to human health.</p> <p>Specifically change MM9 so as to include this justification for a new site. This is consistent with the modification MM7 i.e. Objective 8. Similarly change MM10 and MM21.</p>	<p>The air quality policies of the SLWP, and the boroughs' individual Local Plans and guidance documents, would be considered alongside policy WP1, if a new waste site were proposed. As such, the boroughs do not consider it is necessary to add a specific air</p>

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
				[Representation repeated below under MM9 and MM21]	quality criteria to Policy WP1 or its justification/amplification as the Plan should be read as a whole.
34	Con21: WPRA	MM15	Object	<p>[2.2] An important modification is MM 15 which reads <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></p> <p>- There appears to be no modification that clearly requires the local authorities to measure the air pollution, or traffic levels, on roads that are affected by the waste sites. The same is true for the levels of dust, noise and air pollution at the sites. All this should be required.</p> <p>While Merton, for example, has made good progress towards installing continuous and automatic monitoring of air quality and traffic levels, with for example Breath London, it is so far temporary in nature, not systematically rolled out and is not fully funded. For example, some of the key roads used by the HGV's from Weir Road waste sites, such as Alexander, Durnsford, and Gap Roads and Plough Lane, are not properly monitored. Without such data it will be difficult to know what sites are failing in the annual review.</p> <p>Given a list of the sites which are failing, and so no longer safeguarded, the plan does not specify how new, less polluting, sites can be found. It appears that this is to be left up to the market to arrange. This might be difficult because it will involve developers whose business is waste and others who have expertise in industrial land.</p> <p>Given that the origin of the problems, it is only fair that the Boroughs should take some responsibility for bringing about the solution. They should be required to have strategies to find new less polluting sites much as they did for the 2012 plan. To be concrete lets take the example of the sites in Weir Road. The waste carrying HGV traffic does lead to significant air pollution on the surrounding roads and this is causing very significant harm to local residents. During the first review of the 2022 plan these sites should no longer be safeguarded and so lined up for closure. For this to take place</p>	<p>As discussed during the hearing sessions there are a number of organisations and mechanisms for managing waste sites, including the London Plan, the SLWP, the Environment Agency and the Boroughs' Planning Enforcement and Environmental Health teams. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to close down operational waste sites and, even if a waste safeguard were removed from a site through a plan-led process, it does not automatically follow that the sites would cease operations.</p> <p>The MMs have sought to explain these different agents and their responsibilities and this is clearly set out in MM47. This includes who is responsible for monitoring existing waste sites as the draft SLWP, when adopted, cannot retrospectively apply policies to</p>

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				<p>compensatory provision will have to be found. Given the new very strict restrictions mentioned above in MM32 this will not be easy as it should, for example, be air quality neutral. However, what is really required is that this new provision substantially reduces air pollution taking into account the reduction in pollution at Weir Road. From this viewpoint the modifications in MM32 are not helpful.</p> <p>WimSoc in its letter to the Council in October of last year (referring to the Weir Road operation) said that processing facilities of this type of waste should be relocated to another site in the SLWP Boroughs that is directly accessed from a major road and does not as now cause such severe traffic and environmental impact on local residential roads. WRPA in its submission to the local plan also advocated the same.</p> <p>The modifications place very strong constraints on new developments, new planning permissions and possibly on intensifications of use. They will have little effect as the 2022 draft plan also places very strong constraints on possible new sites and largely freezes in place the previously allocated sites in the 2012 plan. Essentially the stable door has been closed after the horse has bolted.</p> <p>The new air quality constraints should apply to the operations on the existing sites when they are subject to the annual review. The Boroughs should also be required to develop a clear strategy for the closure of failing sites and the search for new less polluting sites.</p>	<p>consented schemes or operational sites.</p> <p>For example, MM47 states that 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 Annual Monitoring Report. Any additional information on enforcement action can be requested from the regulator.</p>
35	Con21: WPRA	MM15	Object	<p>[3.1] The modifications should require the boroughs to carry out air quality and traffic assessments on the roads used by the HGV's coming from waste processing sites.</p> <p>Particular attention should be paid to roads on which the EU air pollution limits are exceeded. They should also monitor the levels of dust, air quality and noise at the waste sites themselves and the waste operators should be obliged to allow such monitoring on site if the local authority wishes to do so. The results should be published. Perhaps MM15 should be changed to</p>	<p>Disagree.</p> <p>As discussed during the hearing sessions there are a number of organisations and mechanisms for managing waste sites, including the London Plan, the SLWP, the Environment Agency and the Boroughs' Planning</p>

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				specifically require the boroughs to carry out such air quality and traffic assessments.	<p>Enforcement and Environmental Health teams as some of the matters raised go well beyond the scope of the SLWP to tackle alone.</p> <p>This is why the MMs have sought to explain these different agents and their responsibilities and this is clearly set out in MM47. This includes who is responsible for monitoring existing waste sites as the draft SLWP, when adopted, cannot retrospectively apply policies to consented schemes or operational sites.</p> <p>MM47 states that 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. 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</p>

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					<p>the environment (which include “A2 installations” and “Part B installations”). The responsibility for checking compliance falls to the issuer of the permit (the regulator). The Environmental Permitting Regulations are the basis for any enforcement action and the principal offences are:</p> <ul style="list-style-type: none"> • operating a regulated facility without a permit; • causing or knowingly permitting a water discharge activity or groundwater activity without a permit; and • failing to comply with a permit condition, flood risk activity emergency works notice, flood risk remediation notice or an enforcement-related notice. <p>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.</p>

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					As such, there are existing mechanisms in place to monitor air quality performance, as discussed extensively prior to and during the EIP hearings. Notwithstanding this, the modifications to the Monitoring Table (MM120) have been proposed to further strengthen air quality monitoring. Specifically, Indicator 5.7 states that its 'Outcomes sought' is: <i>"That polluting emissions from the construction and operation of waste sites and associated transport movements do not cause an exceedance of national and regional air quality objectives and are minimised to acceptable levels that do not cause undue harm are not harming to the environment or local communities"</i> and in the 'Management Actions' that: <i>"Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP's policies and safeguarded sites."</i>
36	Con1: Mayor of London	MM16	Support and suggested change	The proposed modifications to the Policy provide clear guidance and clarity on how proposals for new sites for construction and demolition, radioactive, agricultural and hazardous waste will be considered and introduce a	Disagree. If existing sites were no longer suitable there are already mechanisms within the

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				<p>necessary level of flexibility that will allow for this type of development that meet the relevant proposed criteria. For these reasons the proposed modification is welcome.</p> <p>Advances in waste technologies may mean that existing waste sites are no longer suitable, and this could be included as an additional element. This point is raised in the proposed addition to paragraph 5.8 and could be reflected in Policy WP2 (d) too for consistency.</p>	Plan for relocation such as comprehensive redevelopment of the site, by providing compensatory provision on an alternative site or new sites through the exiting provisions of WP1, WP2 and WP3. As such, the Councils consider it unnecessary to add this as a specific provision.
37	Con21: WPRA	MM17	Object	[3.3] Change MM17 to exclude intensification of sites that are causing harm to human health as a result of air pollution. The site M14 is a case in point.	The Plan has to be read as a whole when proposals for development are being prepared. All relevant policies of the SLWP and the boroughs' Development Plans will need to be satisfied. This includes policies on air quality and protecting and enhancing amenity.
38	Con1: Mayor of London	MM19	Support and suggested change	The Mayor welcomes that Policy SI 9 of the LP2021 is reflected and supported in the draft Plan including that if there is clear evidence that there is surplus capacity in elsewhere in London to meet apportionment and that the target of achieving net self-sufficiency is not compromised, this can provide the justification to release waste sites for other land uses. However, paragraph 9.9.2 of the LP2021 should also be taken into consideration in this instance, which is clear that any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis. In this light the new paragraph should make it clear that the release of sites should not be done on a case by case basis but must only be done as part of a review or update to the South London Waste Plan to be consistent with Policy SI 9C of the LP2021.	Disagree. The London Plan forms part of the Development Plan for each borough, which includes Policy SI 9 of the LP2021. As such, the Boroughs do not consider it necessary to repeat its policies within the SLWP.

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39	Con1: Mayor of London	MM20	Support and suggested change	The Mayor is pleased that proposed modifications to Part (c) reflect the modifications agreed as part of the Statement of Common Ground. Part (e) of the Policy should make it clear that applications for non-waste uses on a safeguarded waste site will only be supported where compensatory capacity is provided ahead of any release of a waste site or waste use.	Noted. The Boroughs consider clause (e) of the policy is already sufficiently clear. This is also clarified in MM19.
40	Con21: WPRA	MM21	Object	<p>[3.2] The modifications should replace the requirement of air quality neutral for a new site by the requirement that the new site would substantial reduce air pollution by taking into account that it replaces sites that are causing damage to human health.</p> <p>Specifically change MM9 so as to include this justification for a new site. This is consistent with the modification MM7 i.e. Objective 8. Similarly change MM10 and MM21.</p> <p>[Representation repeated below under MM9 and MM10]</p>	The air quality policies of the SLWP, and the boroughs' individual Local Plans and guidance documents, would be considered alongside policy WP3, if a new waste site were proposed. As such, the boroughs do not consider it is necessary to add a specific air quality criteria to Policy WP3 or its justification/amplification as the Plan should be read as a whole.
41	Con1: Mayor of London	MM24	Support	The Mayor is pleased that proposed modifications to Policy WP4 reflect the modifications agreed as part of the Statement of Common Ground.	Noted.
42	Con44: Historic England	MM27	General comment	With apologies that this email is sent after the close of the consultation – Historic England has no comments to make on the main modifications, other than to welcome the amendment to policy WP5, but also to point out that the amendment is worded slightly differently on pages 15 and 16 of the consultation document. I believe the wording on page 15 is the correct one and as proposed by Historic England.	Agree. The correct wording is that set out in MM27 on page 15. MM31, where the slight incorrect working is located, was a consolidated version of the whole policy. The Boroughs confirm that MM27 is what is intended for the final policy.
43	Con21: WPRA	MM28	Object	[2.1] There are a significant number of modifications and quite a few of these concern air quality. Indeed some of these are provide strong constraints. For example - modification MM28 to policy WP5 requires ... taking account of national air quality objectives and current exceedances... but this only applies new developments.	Noted. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
					retrospectively apply policies to existing sites that are operational or permitted. As discussed above, there are a number of other mechanisms and organisation that are responsible for monitoring the impact of existing sites.
44	Con21: WPRA	MM28 MM32 MM43 MM47 MM53	Suggested Change	[3.4] The modifications MM28, MM32, MM43, MM53 and MM47 are excellent requirements but they do not apply to existing sites and this should be changed so that they do when the existing sites are subject to the annual review. Clearly existing sites should satisfy the same constraints as new developments.	<p>Noted. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to retrospectively apply policies to existing sites that are operational or permitted. As discussed above, there are a number of other mechanisms and organisation that are responsible for monitoring the impact of existing sites.</p> <p>However, the modifications to the Monitoring Table (MM120) have been proposed to further strengthen air quality monitoring. Specifically, Indicator 5.7 states that <i>“Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP’s policies and safeguarded sites.</i></p>

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45	Con21: WPRA	MM32	General comment	Modification MM32 requires that 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.. but this only concerns the information required for a planning application.	Noted. The information set out in MM32 will provide the basis for the assessment of the impact of a proposed development, in this instance air quality, and will help boroughs conclude whether air quality policies can be satisfied.
46	Con1: Mayor of London	MM36	Support and factual correction	While the proposed modification is welcome it should be noted that reference to Policy G6 for the Mayor's urban greening factor is the incorrect policy. The sentence should be amended so that it correctly refers to Policy G5 of the London Plan.	The council will change this in the final version as a factual correction.
47	Con1: Mayor of London	MM38	Support	The promotion of the LP2021 targets in the proposed amendment that 95% of all inert excavation material goes to beneficial uses and 95% of construction and demolition waste is to be reused, recycled or recovered is very welcome and is consistent with Policy SI 7 of the LP2021	Noted.
48	Con1: Mayor of London	MM40	Support	The proposed amendment refers to and reflects the Mayor's approach set out in LP2021 Policy SI 8D and this is very welcome.	Noted.
49	Con1: Mayor of London	MM41	Support	The proposed amendment refers to and reflects the Mayor's approach set out in LP2021 Policy SI 8D and this is very welcome.	Noted.
50	Con1: Mayor of London	MM42	Support	The addition to the policy requiring early engagement with operators of waste sites is welcomed. It should also be noted that where new development could have a potentially negative impact on an existing waste site, the SLWP should consider the application of the Mayor's Agent of Change principle as set out in paragraph 9.8.20 of the LP2021 and Policy D13. The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new development and this should be incorporated into Policy WP8.	Noted. The London Plan forms part of each Boroughs' Development Plan so it is not considered unnecessary to repeat its provisions within the SLWP.

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51	Con18: Day Group	MM42	Support	<p>We are instructed by our client, Day Group Ltd, to provide the following response in respect of the Main Modifications (“MM”) to the Draft South London Waste Plan (“SLWP”) consultation running to 2 September 2022. This response follows representations made on behalf of Day Group in October 2020 to the South London Waste Plan (Submission Version), which was supportive of the amendments included in the Submission Plan in that they responded to Day Group objections made at Issues and Preferred Options stage.</p> <p>In particular Day Group responded on the following Policies/supporting text and considered the Submission Plan to be sound in terms of how these were proposed.</p> <ul style="list-style-type: none"> • Site Safeguarding: C4, Day Aggregates Purley Depot, Approach Road, Croydon CR8 2AL • Policy WP3 - Existing Waste Sites • Policy WP8 - New Development Affecting Waste Sites • Appendix 2 – Sites Counting Towards the Apportionment and C&D Target; <p>It is noted in the context of Policy WP8 our previous representations confirmed that the Policy was considered to robustly address the overarching issues which need to be considered when new development is proposed in the vicinity of such sites. However, the response also stated that to maximise the prospects that new development will not prejudice, directly or indirectly, the waste function of safeguarded sites that it is key that baseline assessments take fully into account all operations and potential sources of noise and disturbance. This is to ensure that new development is designed based on a full understanding of the operation of the safeguarded site – taking into account all activities and hours of operation. This is best achieved via early engagement between the developer and the waste site operator.</p> <p>The Day Group Response to the Submission Plan suggested additional wording to Policy WP8 to further strengthen the protection it affords safeguarded waste sites. This being with the intent to underpin the</p>	Agree.

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				<p>“effectiveness” of the plan and its “consistency with national policy”. This response was acknowledged by the joint Waste Authorities within the Schedule of Representations published in January 2021, which stated that the Waste Authorities agreed with the suggested wording for Policy WP8.</p> <p>MM42 now formally sets out the proposed additional wording to Policy WP8 as sought by Day Group. On this basis MM42 is welcomed and fully supported and considered to be ‘sound’.</p>	
52	Con19: D B Cargo	MM42	Support	<p>In the context of Policy WP8 our previous representations to the Submission Plan suggested additional wording to Policy WP8 to further strengthen the protection it affords safeguarded waste sites. This being with the intent to underpin the “effectiveness” of the plan and its “consistency with national policy”. This response was acknowledged by the joint Waste Authorities within the Schedule of Representations published in January 2021, which stated that the Waste Authorities agreed with the suggested wording for Policy WP8.</p> <p>MM42 now formally sets out the proposed additional wording to Policy WP8 as sought by DB Cargo. On this basis MM42 is welcomed and fully supported and considered to be ‘sound’.</p> <p>I trust this response in respect of the proposed Main Modifications is helpful and in particular the confirmation that proposed safeguarding of the Chessington Railhead Site (under MM71) has resolved the issues of soundness previously identified. I would be grateful for confirmation of receipt of these representations and confirmation that they have been duly made.</p>	Agree.
53	Con21: WPRA	MM43	Object	<p>Modification MM43 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;. but this applies to new developments.</p>	Noted. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to retrospectively apply policies to existing sites that are operational or permitted. As

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					<p>discussed above, there are a number of other mechanisms and organisation that are responsible for monitoring the impact of existing sites.</p> <p>However, the modifications to the Monitoring Table (MM120) have been proposed to further strengthen air quality monitoring. Specifically, Indicator 5.7 states that <i>“Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP’s policies and safeguarded sites.”</i></p>
54	Con21: WPRA	MM47	Object	<p>Modification MM47 contains The waste operator is responsible for ensuring that its regulated facility does not cause pollution of the environment and harm to human health but this only concerns compliance with the terms and conditions of the permit. These will have little effect as the 2022 plan essentially does not essentially permit significant new development as it freezes in place the sites allocated in the 2012 plan.</p>	<p>Noted. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to retrospectively apply policies to existing sites that are operational or permitted. As discussed above, there are a number of other mechanisms and organisation that are responsible for monitoring the impact of existing sites.</p> <p>However, the modifications to the Monitoring Table (MM120)</p>

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					have been proposed to further strengthen air quality monitoring. Specifically, Indicator 5.7 states that <i>“Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP’s policies and safeguarded sites.</i>
55	Con 48: Resident MS	MM48	General Comment	It is on the issues of robustness & effectiveness of the monitoring that I have concerns, given the continuing demands & constraints on Local Authority funds. Whilst the Sustainability Appraisal gives Modification 120, p.93 credit for anticipated maximum Beneficial Impact against all criteria, to ensure that the benefits are delivered, it would be helpful to have a little more clarity at Ref: 48, p.41, which strengthened Policy WP10. Whilst the annual publication of the Waste Authority Monitoring Report can be implied by the entries in Appendix 1 of the Draft South London Waste Plan Consultation Document submitted in September 2020, it would be helpful to know the Main Modifications confirm this.	Noted, no action. The Councils consider that the wording of policy WP10 makes it clear that the requirements of the Monitoring and Contingency table in Appendix 1 will be reported through the annual Authority Monitoring Report (AMR). In any event, the publication of an AMR is a statutory requirement of plan making.
56	Con1: Mayor of London	MM49	Support	The proposed modification means that the approach to establishing maximum throughput of a site is clearly consistent with the approach set out in paragraph 9.9.2 of the LP2021.	Noted.
57	Con21: WPRA	MM53, 55, 59 62, 65, 66, 67, 68, 69, 72, 73, 74, 75, 78, 79, 84, 89, 90, 93, 96, 98, 101, 102, 104, 105, 108, 110, 111, 113	Object	Modifications MM53, 55 59 62, 65, 66, 67, 68, 69, 72, 73, 74, 75, 78, 79, 84, 89, 90, 93, 96, 98, 101, 102, 104, 105, 108, 110, 111, 113 and 117 has the following ...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... but these refers to intensification, or a new planning permission.	Noted. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to retrospectively apply policies to existing sites that are

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		105, 108, 110, 111, 113 and 117			<p>operational or permitted. As discussed above, there are a number of other mechanisms and organisation that are responsible for monitoring the impact of existing sites.</p> <p>However, the modifications to the Monitoring Table (MM120) have been proposed to further strengthen air quality monitoring. Specifically, Indicator 5.7 states that <i>“Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP’s policies and safeguarded sites.</i></p>
58	Con21: WPRA	MM53, 55, 59, 62, 65, 66, 67, 68, 69, 72, 73, 74, 75, 78, 79, 84, 89, 90, 93, 96, 98, 101, 102, 104, 105, 108, 110, 111, 113 and 117	Object	[3.5] The modifications MM53, 55 59 62, 65, 66, 67, 68, 69, 72, 73, 74, 75, 78, 79, 84, 89 , 90, 93, 96, 98, 101, 102, 104, 105, 108, 110, 111, 113 and 117 have the following ...Avoiding harm to the living conditions of the occupants of those residential [MM53] properties in the vicinity of the site, especially with regard to air emissions and noise impacts... but they refer to intensification, or a new planning permission. However, we know some sites, such as those in Weir Road (M10, M12, M14) are currently causing harm to human health as a result of the air pollution that they generate. In particular M14 is identified for intensification when we know this is already the case for this site. The wording should be changed so that the existing sites, as they are currently operating, are subject to this condition when they are subject to the annual review and it should be made clear that it also applies to the pollution on local roads in the vicinity.	Noted. Whilst boroughs can enforce planning conditions attached to consented schemes the SLWP does not have the power to retrospectively apply policies to existing sites that are operational or permitted. As discussed above, there are a number of other mechanisms and organisation that are responsible for monitoring the impact of existing sites.

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				<p>[3.6] Boroughs should be required to give a clear strategy for how the replacement of sites that fail the annual review by new sites can be achieved. We leave it to the Boroughs to suggest which modification could incorporate this. The modifications should be changed so that the Boroughs are required to assess air quality in the affected roads, the air quality conditions also apply to the existing sites and also be required to have a strategy for the replacement of polluting sites by others that are less polluting. If these changes are not adopted then waste processing in South London has not properly taken into account air pollution and so the 2022 plan is not sound. The alternative is to re-run the 2022 plan so as to properly take account of air pollution from the outset, as should have been the case in the first place.</p> <p>This document is co-signed by the following resident associations and organisations which are affected by the Weir Roads waste sites</p> <ul style="list-style-type: none"> • The Wimbledon Park Residents Association • The Wimbledon Union of Residents Associations • The Wimbledon Society • Chair Wimbledon Society Planning and Environment Committee • The Wimbledon East Hillside Residents Association • The South Ridgway Residents Association • Belvedere Estate Residents Association <p>The following councillors in the Weir Road area have agreed to co-sign</p> <ul style="list-style-type: none"> • Wimbledon Park Ward - Jil Hall, Samantha MacArthur and Tony Reiss. • East Hillside Ward - Dan Holden and Susie Hicks • Village Ward -Max Austin, Thomas Barlow • Wandle Ward - Kirsten Galea <p>— We have only asked organisations and councillors near the Weir Road sites. Several councillors were on holiday and so could not be contacted even so we have most of them.</p>	<p>However, the modifications to the Monitoring Table (MM120) have been proposed to further strengthen air quality monitoring. Specifically, Indicator 5.7 states that <i>“Consistent and significant failure to meet relevant air quality targets over successive monitoring periods will trigger a review of the SLWP’s policies and safeguarded sites.</i></p>

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59	Con21: WPRA	MM120	General comment	<p>In Annex 2 Monitoring Table New Indicator 5.4 Biodiversity Net Gain – the reference to Biodiversity Metric 3.0 has been superseded following the introduction of Biodiversity Metric 3.1 by Natural England in April 2022. You may wish to amend to be consistent with national policy.</p> <p>In Annex 2 Monitoring Table Indicator 6.2 Carbon emissions: Reference is made to the standards set out in Part L2 of the Building Regulations 2013. However, these were updated in June 2022. You may wish to amend to be consistent with national policy.</p>	<p>Agree.</p> <p>The Councils consider these to be factual corrections so will make this change in the final version.</p>
60	Con1: Mayor of London	MM123	Support	The proposed modifications to the glossary definitions will provide far greater clarity on the differences between consented, existing and safeguarded waste sites and this is welcomed.	Noted.
Safeguarded Waste Sites					
61	Con19: D B Cargo	MM71	Support	<p>We are instructed by our client, DB Cargo, to provide the following response in respect of the Main Modifications (“MM”) to the Draft South London Waste Plan (“SLWP”) consultation running to 2 September 2022. This response follows objections made on behalf of DB Cargo in October 2020 to the South London Waste Plan (Submission Version), and submission of a Hearing Statement and appearance at the Examination in Public (“EIP”).</p> <p>The objections raised by DB Cargo were primarily with regard to the failure of the Submission Draft SLWP to safeguard the Chessington Rail Head Site at Garrison Lane, Chessington. The Plan’s approach to the Chessington Railhead was not considered to be ‘sound’ on the basis that the failure to safeguard the Railhead was not justified, not effective and not consistent with London Plan nor NPPF requirements.</p> <p>As originally proposed the Plan had failed to make policy provision in the form of an allocation or policy safeguarding for the Chessington Rail head site for waste uses or at minimum provide acknowledgement of the site within supporting text given its very particular circumstances. This was despite the fact that both the site owner (Network Rail) and the Long Lease Holder/Freight Operator (DB Cargo) are both statutory railway undertakers and had confirmed that the site was being brought forward under rail related</p>	Agree.

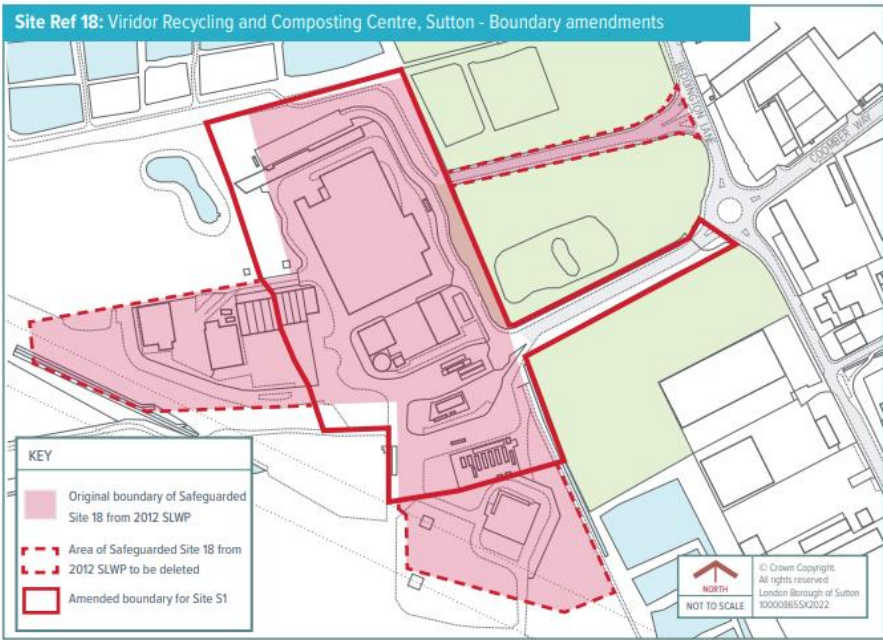
Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
				<p>permitted development rights to facilitate the transfer of freight by rail. Further, that DB Cargo had appointed an experienced minerals and waste operator and granted them a 25 year under-lease subject to the site being in rail use.</p> <p>At the EIP it was accepted by the SLWP Authorities that the site should be safeguarded. The proposed identification of the site under MM71 as site 'K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD' fully addresses the points discussed at the Hearing Sessions, resolves the objections raised in terms of the soundness of the Plan, and is fully supported.</p> <p>Changes to the Policies Map published as part of the consultation have also been reviewed. Proposed changes to the Policies Map to include the Safeguarded Site "K5 Chessington Railhead, Garrison Lane, Chessington, KT9 2LD" are fully supported and correctly reflect the site mapping provided to the SLWP Authorities and the proposed safeguarded status of the site within the SLWP.</p>	
62	Con35: 777 Demolition	MM103	Support	<p><u>Main Modification Ref 103: Deletion of site S1 '777 Recycling Centre' and any other references to it in the Plan</u> (Appendix 2 schedule of Sites counting towards apportionment; Appendix 3 ref 21).</p> <p>We <u>support</u> the Proposed Main Modification which reflects the discussion and position agreed by the Councils at the Examination on 1st & 2nd September 2021.</p> <p>The Proposed Main Modification is considered to be necessary to make the Plan sound. It is:</p> <p>Positively prepared: As demonstrated in our representations on the draft Plan and in Statements submitted to the Examination, and agreed by the Inspectors and the</p>	Agree.

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
				<p>Councils at the Examination, there is more than sufficient existing waste management capacity within the Plan area, to meet the Plan's waste management needs. This will remain the case without the capacity offered by Site 1 '777 Recycling Centre'.</p> <p>Its removal/deletion from the list and description of sites (page 80 and any other part of the Plan) to which Policy WP3 and requirements for safeguarding of waste sites applies, would therefore not impact on the Plan seeking to meet objectively assessed needs. The draft South London Waste Plan recognises (para 3.21 and 5.25) that there is 'exceptional' demand for business and industrial land in the Plan area, particularly the London Borough of Sutton, and sterilisation of land by applying waste designations unnecessarily is to be avoided to support a sustainable business base in the face of unprecedented economic change. The London Plan advises that release of safeguarded sites should be considered as part of the Plan-led process (para 9.9.2).</p> <p>Removal/deletion of Site S1 from the Plan would enable the future re-development of the Site for employment and industrial use, and so contribute to achievement of the much-needed increase in employment/industrial land within LB Sutton (and within the Beddington Lane Strategic Industrial Location) and delivery of the Sutton Local Plan objectives and Policy 14, and London Plan (especially Policy E5).</p> <p>The SA Addendum on the Main Modifications identifies that the proposed Main Modification would have 'small beneficial' impacts against 5 objectives, and no negative impacts.</p> <p>The Proposed Main Modification is therefore 'positively prepared'.</p> <p>Robust: As described above, the evidence presented in our representations to the draft Plan and in Statements submitted to the Examination, were considered to provide robust evidence that the Site was not required to meet objectively assessed needs for waste management as more than</p>	

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
				<p>sufficient capacity exists and more can be released through intensification of existing sites. It was also demonstrated and agreed that the throughput of the Site has been declining for a number of years and the operator plans to cease waste management at the Site due to it being increasingly economically unviable. Its contribution to existing waste management capacity has also been declining, and given the availability of existing waste management capacity and the potential to increase capacity through intensification of existing sites, its loss without compensatory capacity being expressly provided would not adversely affect the Plan's objectives and the provision of sufficient waste management capacity to meet the Plan's needs.</p> <p>The Proposed Main Modification is therefore robust.</p> <p>Effective: Deletion of the Site and its removal from safeguarding, would not adversely affect the deliverability of the Plan, given that there is more than sufficient existing waste management capacity to meet the Plan's assessed needs, with the potential for more to be released through intensification of existing sites.</p> <p>The Proposed Main Modification is therefore effective.</p> <p>Consistent with national policy: The National Planning Policy for Waste (NPPW) does not include a requirement for safeguarding of existing waste sites in development plans. Para 2 requires that Waste '...Local Plans should ensure that planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options' and that 'spurious precision should be avoided.'</p> <p>Para 3 requires waste Local Plans to 'identify sufficient opportunities to meet the identified needs of their area' including (final bullet) considering 'the extent to which the capacity of existing operational facilities would satisfy any identified need.'</p>	

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				<p>NPPW (para 8) concerns determination of applications for non-waste development that may impact on existing waste facilities rather than formulation of planning policy, and requires that impacts must be 'acceptable and ... not prejudice the implementation of the waste hierarchy and/or the efficient operation of sites.'</p> <p>As discussed above, the data demonstrates, and it was agreed at the Examination, that there is more than sufficient waste management capacity to meet the needs of the Plan throughout the Plan period with the deletion/removal of Site S1.</p> <p>The National Planning Policy Framework does not address waste management. As discussed previously, deletion/removal of Site S1 from the Plan and safeguarding provisions would enable its re-development for employment/industrial use within the SIL. As such this would be consistent with:</p> <ul style="list-style-type: none"> • Para 8 (a) 'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.' • Para 11 (a) 'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area...;' • Para 81 'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.' • Para 120 d) 'promote and support the development of under-utilised land and buildings, ' <p>The Proposed Main Modification is therefore consistent with and will help to deliver National policy.</p>	

Changes to the Policies Map

Rep No	Con No	MM Ref	Type of Representation	Representation	Comment
63	Con42: Viridor	N/a	Factual Suggestion	<p>Site Ref 18: Viridor Recycling and Composting Centre, Sutton - Boundary amendments</p>  <p>We write to clarify a point in the emerging SLWP. The solid red line below is an Energy Recovery Facility and Transfer Facility, rather than Viridor Recycling and Composting Centre.</p>	<p>The map shown is taken from the 'Changes to the Policies map' document. It shows the changes to the boundary of the site safeguarding from the 2012 South London Waste Plan and therefore has the title taken from that 2012 document. The safeguarded site in the main South London Waste Plan is correctly titled as the 'Energy Recovery Facility'.</p>