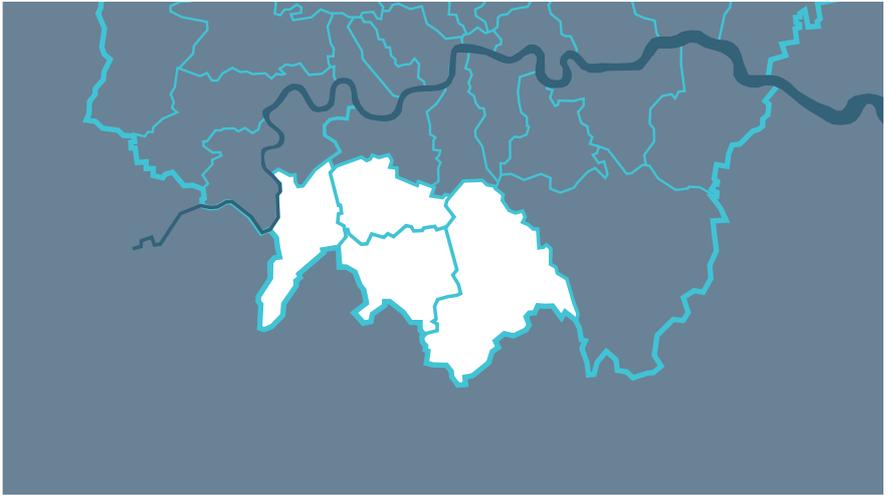


- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



## Issues and Preferred Options Consultation Document

October 2019



## The Consultation

This is an Issues and Preferred Options consultation document for the development of a new South London Waste Plan 2021-2036. This document is essentially an updated version of the currently adopted Waste Plan and additionally includes questions to act as prompts to help with the consultation.

This consultation is undertaken to meet the requirements of Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

The accompanying Sustainability Appraisal is also available for consultation.

The timetable for and how and where further information about the consultation is as follows:

<h3>Consultation dates</h3>
Thursday 31 October 2019 to Sunday 22 December 2019

**Copies of the document, the Sustainability Appraisal and background evidence are available at:**

<https://www.croydon.gov.uk/planningandregeneration/framework/localplan>

[www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/1353/new\\_local\\_plan](http://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan)

[www.merton.gov.uk/planning-and-buildings/planning/local-plan](http://www.merton.gov.uk/planning-and-buildings/planning/local-plan)

[www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

Hard copies of the documents are available at council offices and libraries across the four boroughs.

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## The South London Waste Plan – What it is

- 1.1 The South London Waste Plan will set out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 to 2036. It will be used for the determination of planning applications relating to waste facilities (i.e. a facility on a site where waste is sorted, processed, recycled, composted or disposed of or a facility on a site where waste is mainly delivered for bulking prior to transfer to another place for processing, recycling, composting or disposal). Development for waste facilities should only be allowed in accordance with this plan and other documents and plans which constitute a borough's Development Plan, unless material considerations indicate otherwise.



- 1.2 The South London Waste Plan is a joint Development Plan Document and will form part of the Development Plans for the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton.
- 1.3 Most adopted plans within a borough's Development Plan, such as a Local Plan or Core Strategy, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies of the Mayor of London's London Plan, which is also part of the Development Plan. Therefore, for the development of a waste facility, a number of adopted plans and supplementary planning documents will have to be consulted.
- 1.4 For further information, in the first instance, visit the planning policy pages of the relevant borough's website:
- <https://www.croydon.gov.uk/planningandregeneration/framework>
  - [www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/285/development\\_plan\\_documents](http://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/285/development_plan_documents)
  - [www.merton.gov.uk/planning-and-buildings/planning/localplan](http://www.merton.gov.uk/planning-and-buildings/planning/localplan)
  - [www.sutton.gov.uk/planningpolicy](http://www.sutton.gov.uk/planningpolicy)
- 1.5 The London Plan can be accessed at:  
[www.london.gov.uk/what-we-do/planning/london-plan](http://www.london.gov.uk/what-we-do/planning/london-plan)



## Introduction

### Background

- 2.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In 2007, the four boroughs decided to plan for waste collaboratively and produce a joint Development Plan Document (DPD), covering the principal types of waste such as household, commercial and industrial and construction and demolition waste. This resulted in the production of the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. This South London Waste Plan Issues and Preferred Options document is the start of the process of updating the 2012 waste plan and is anticipated to be adopted in 2021. It will then cover the planning period 2021 to 2036.
- 2.2 The South London Waste Plan sets out the partner boroughs' long-term vision, spatial strategy and policies for the sustainable management of waste over the next 15 years. Policies and site safeguarding set out in detail how the four boroughs will meet their waste management targets and limit the impact of waste facilities.
- 2.3 The South London Waste Plan boroughs should prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008, as amended). This plan must set out an analysis of the current waste management situation and future forecasts, an assessment of the need for waste installations, location criteria for sites and policies.
- 2.4 The "National Planning Policy for Waste" (NPPW), published in 2015, sets out the Government's waste planning policies which all Waste Planning Authorities must have regard to when developing local waste plans. The NPPW is supplemented by the "Planning Practice Guidance" section on waste which provides further detail on how to implement the policies.
- 2.5 The NPPW states that Waste Planning Authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

## Planning for Waste

### The Waste Hierarchy

- 2.6 The underlying philosophy for the management of waste is reflected in the waste hierarchy which ranks waste options according to a priority which is usually shown in an inverted pyramid-like diagram, see opposite. The ranking of the various waste management options is based on current scientific research on how the options would impact on the environment in terms of climate change, air quality, water quality and resource depletion.



Figure 1  
The Waste Hierarchy



## The Waste Hierarchy

2.7 This illustrates the principle that the top priority for waste is to prevent creating it in the first place, then it is re-use, recycled, recovered and finally disposed of (e.g. landfill). This is a spatial planning document so it does not directly concern itself with the prevention of waste but it does seek to manage waste in the highest levels possible.

## National Drivers

2.8 The Waste Management Plan for England (2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and the management of waste. To that effect, it encourages waste planning authorities to:

- Deliver sustainable and efficient facilities
- Consider waste management alongside other requirements such as transport, housing and jobs
- Ensure businesses and residents are engaged
- Drive waste up the Waste Hierarchy

2.9 The way that waste authorities need to delivery effective waste planning is to apply the principles of self-sufficiency and proximity (commonly referred to as the "proximity principle"). This, in theory, expects waste authorities to deal with their own waste but there is no expectation that each local authority should deal solely with its own waste and instead should strive for net self-sufficiency. However, planning over a larger area such as that covered by the South London Waste Plan boroughs does provide for a more strategic and sustainable approach to waste in this area.

## Regional Drivers

2.10 The regional driver for the South London Waste Plan is the Mayor of London through the London Plan. This plan takes the policies and targets for the Draft London Plan (July 2019) as the boroughs expect the waste section of the draft plan, at least, to be adopted.

2.11 The Draft London Plan reflects the general philosophy of the waste hierarchy as well as national guidance but, in informing the South London Waste Plan, it sets out how this should be achieved in London. In particular, the Draft London Plan reiterates the targets for waste management set out in the Mayor's London Environment Strategy (2018), namely:

- No biodegradable or recyclable waste to landfill by 2026
- 65% of 'municipal' (household and business) waste recycled by 2030, comprising: 50% Locally Authority Collected Waste recycled by 2025; and 75% business recycled by 2030
- 95% of construction, demolition and excavation waste to be recycled by 2020

2.12 The strategic approach and policies in the London Plan are based on the forecast amount of waste that needs to be planned for the "arisings". These are then transformed into apportionments for individual boroughs based on criteria on the scope of a borough to manage waste. These have informed this South London Waste Plan Issues and Preferred Options document and more information on the apportionments are set out in Section 4 (Policy WP1 and WP2).

2.13 In order to meet the apportionment and targets, the Draft London Plan requires boroughs to:

- Safeguard existing sites
- Provide new waste management sites where required
- Optimise the waste management capacity of existing sites, and
- Create environmental, social and economic benefits from waste and secondary materials management





## Local Drivers

2.14 The South London Waste Plan is driven by the need of the boroughs to meet their Draft London Plan targets and apportionments and the sustainable development aim to provide enough waste capacity to manage the waste the area generates.

2.15 To this end, in December 2018, the four boroughs commissioned waste planning consultants Anthesis to undertake a study of the boroughs existing capacity and likely future capacity. From this evidence, the following preferred strategy has been identified:

- Safeguard existing, operational waste sites
- Encourage the intensification of appropriate sites to meet the Construction and Demolition waste stream capacity shortfall
- Not plan for other waste streams as either the waste stream is so small as to be insignificant or the capacity is sufficient already

## The Sustainability Appraisal

2.16 The purpose of a Sustainability Appraisal (SA) is to evaluate development policies and proposals through the integration of social, environmental and economic considerations into the preparation of the planning documents. The South London Waste Plan boroughs have already produced a Scoping Report setting out the sustainability issues and how they will be evaluated. A Sustainability Appraisal on the South London Waste Plan Issues and Preferred Options document has also been carried out and is also part of this consultation.

## Equalities Impact Assessment

2.17 At the next stage of the plan's preparation when policies and sites are more finalised, the South London Waste Plan boroughs will carry out an Equalities Impact Assessment to ensure the South London Waste Plan does not adversely affect members of socially excluded or vulnerable groups and to meet the partner boroughs' statutory duties.

## Duty to Cooperate

2.18 The Localism Act 2011 (Section 110) prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must "maximise the effectiveness" of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on waste issues, particularly cross-boundary issues. This process is being undertaken as part of this South London Waste Plan Issues and Preferred Options consultation and will be ongoing through to the plan's adoption.



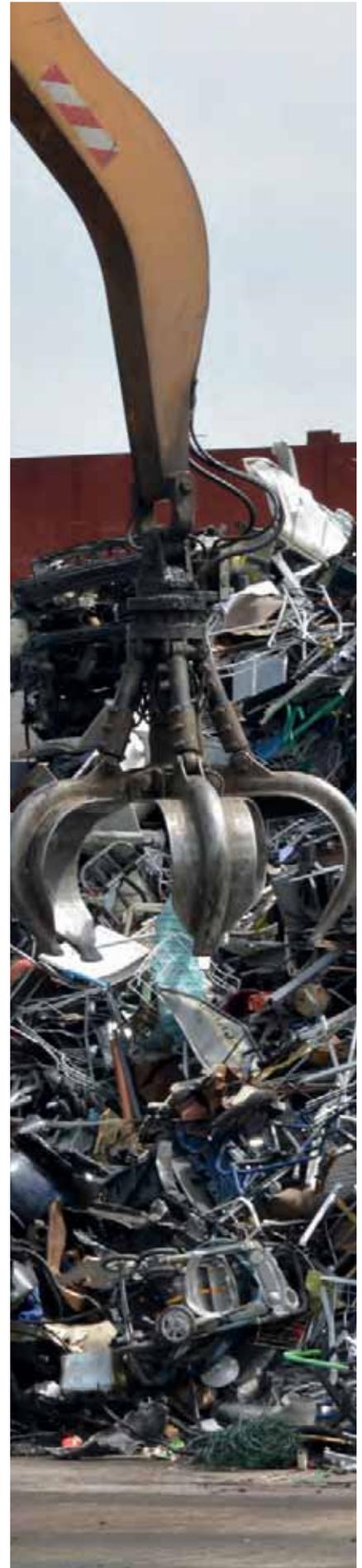


## Key Issues

- 3.1 Like the South London Waste Plan 2012, the development of the replacement South London Waste Plan must be informed by an up-to-date and proportionate analysis of the context of the plan area and the key issues and challenges facing it.
- 3.2 A full description of the partner boroughs' characteristics is available in the accompanying Sustainability Appraisal (SA) report. The SA includes an analysis of population demographics, employment, social deprivation and the provision of transport networks. It identifies the location of the boroughs' conservation areas, nature conservation areas and protected open space as well as areas at risk of flooding. These are all important factors when considering suitable locations for waste management facilities. The Sustainability Appraisal has been produced alongside the Issues and Preferred Options South London Waste Plan document and has influenced the Plan's production.
- 3.3 Evidence supporting the South London Waste Plan Issues and Preferred Options document has been produced by the consultancy Anthesis on behalf of the four boroughs. The draft South London Waste Plan Technical Report 2019 sets out key data on waste issues in south London and analyses it in the context of national policy, the published London Plan 2016 and the emerging draft London Plan 2017-2019. The SLWP Technical Report 2019 is published alongside this consultation
- 3.4 From local evidence, national and London's policy on waste, five key issues have been identified for the draft South London Waste Plan 2021-2036 to address.

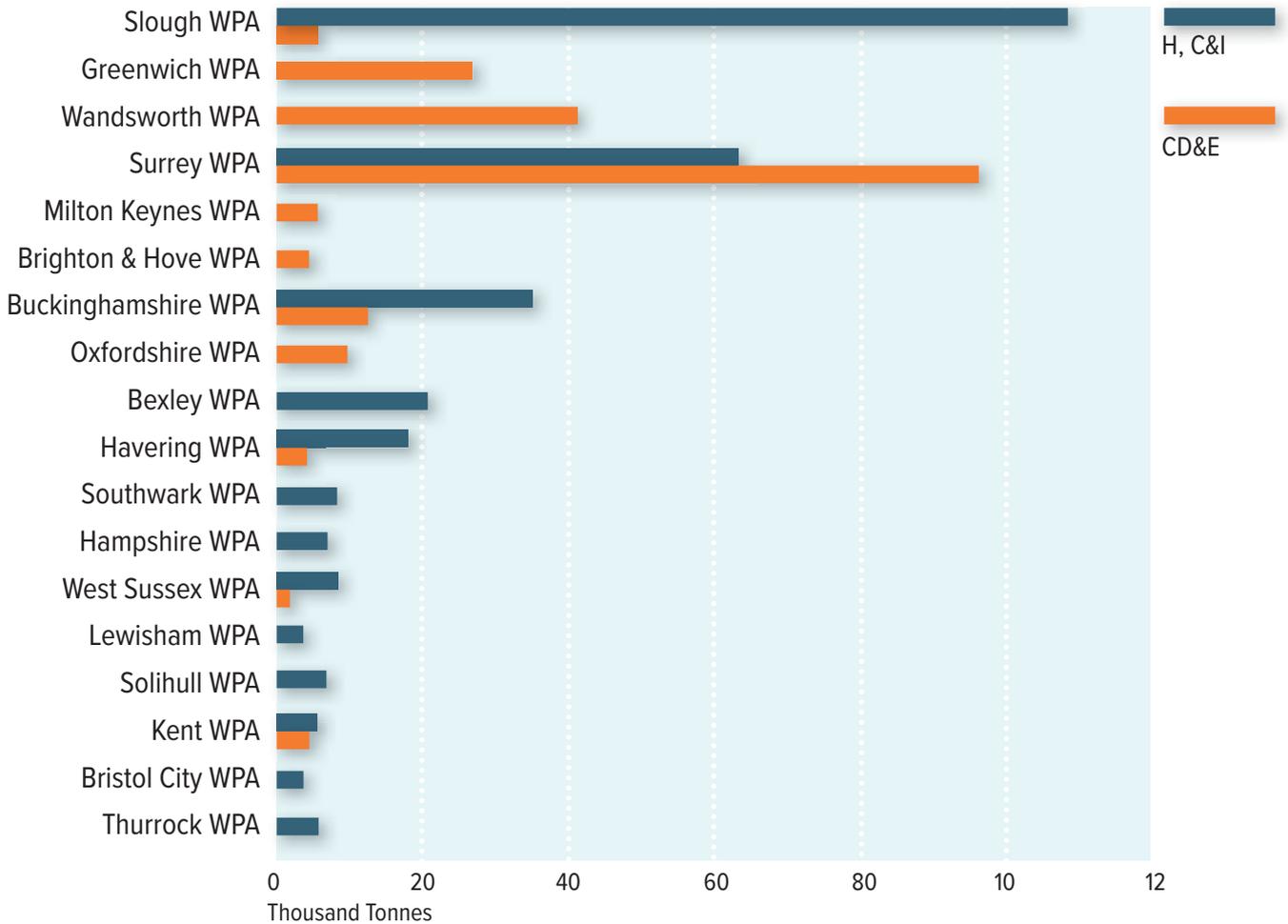
## Key Issue 1 Cross Boundary Issues

- 3.5 Waste is a strategic cross-boundary issue. Authorities have a legal "duty to co-operate" under the Localism Act to ensure that authorities work together on strategic issues such as plan-making for waste.
- 3.6 The Mayor's London Plan considers waste arising from households, businesses and other sources within London's boundaries and apportions an amount of this waste for each London borough to manage. However, different types of waste are managed in different facilities which often need a wide catchment to be economically viable so to achieve net self-sufficiency every area will have some waste imports and exports.



3.7 The South London Waste Plan Technical Report 2019 sets out in detail the last five years of exports and imports between the SLWP boroughs and other waste authorities.

Figure 2 South London Waste Plan Exports (tonnes) of Household, Commercial and Industrial (H, C&I) and Construction & Demolition (CD&E) Waste in 2017



3.8 The Technical Report Table 44 demonstrates that in 2017 approximately 300,000 tonnes of household and commercial and industrial waste was exported to be managed in other waste authorities. The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey WPA, with no one facility receiving more than 31,000 tonnes.

Figure 3 South London Waste Plan Imports and Exports of Waste Streams in 2017 (tonnes)

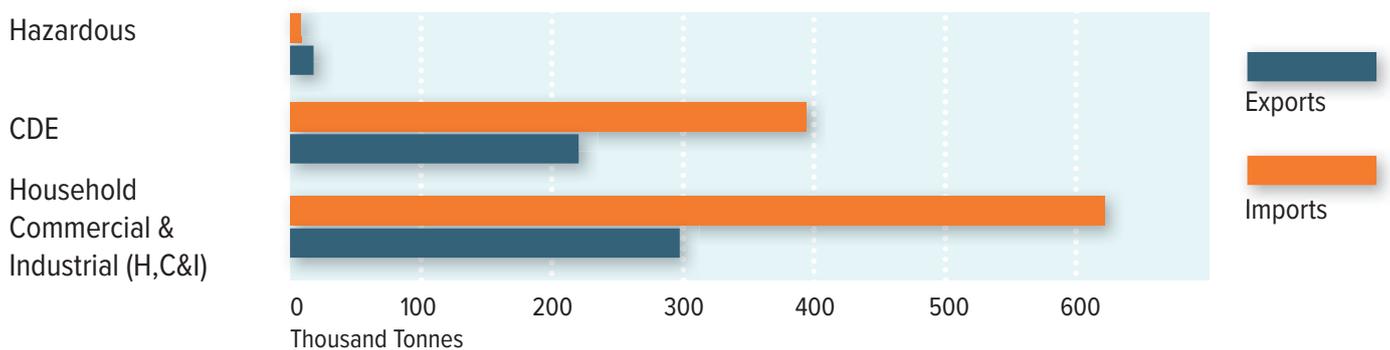


Figure 4 South London Waste Plan Imports of Household, Commercial & Industrial (H,C&I) Waste in 2017 (tonnes)

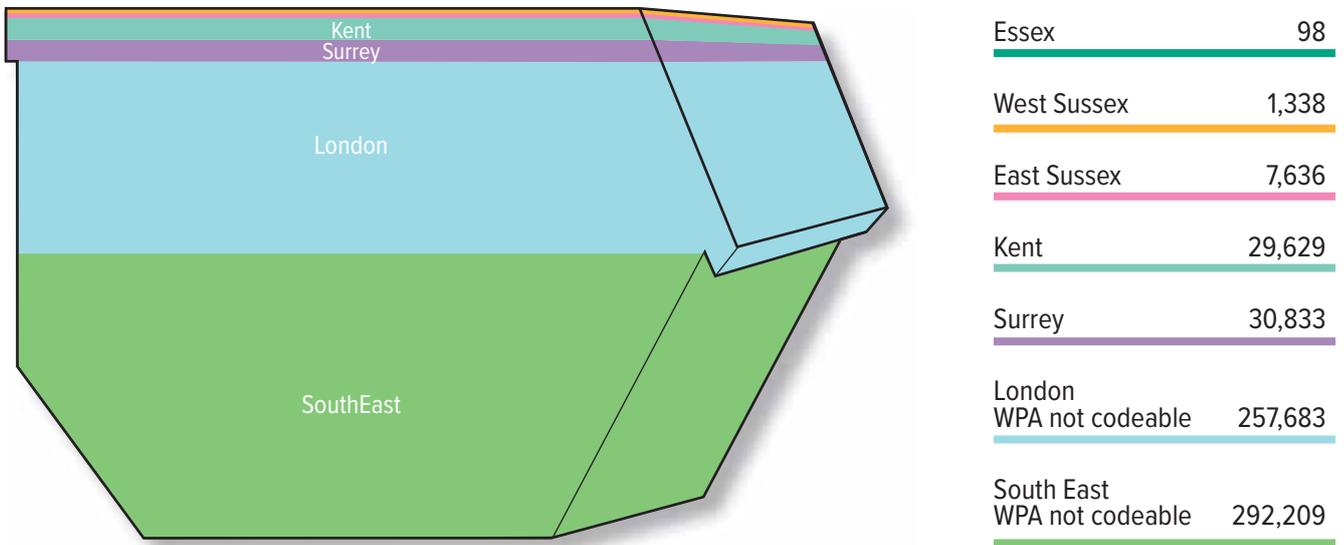
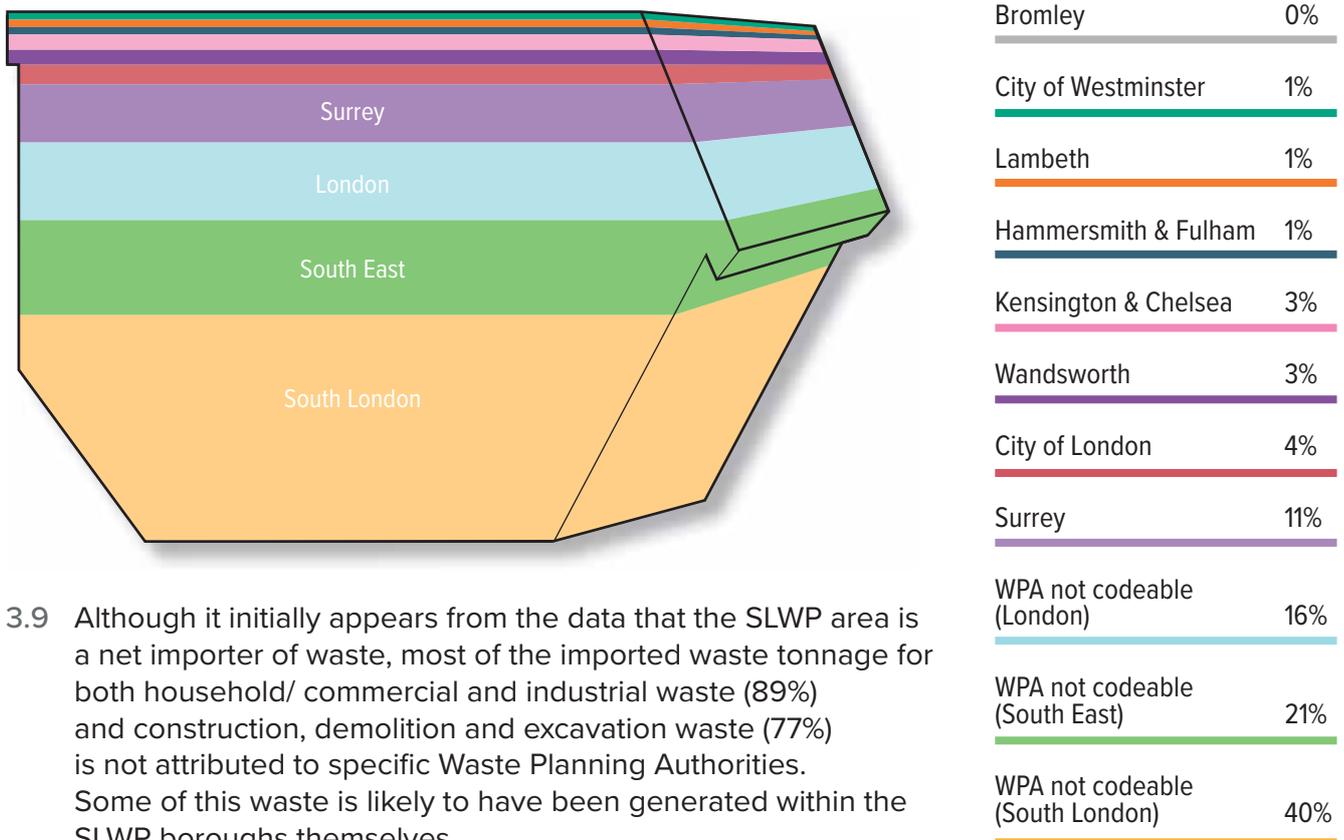


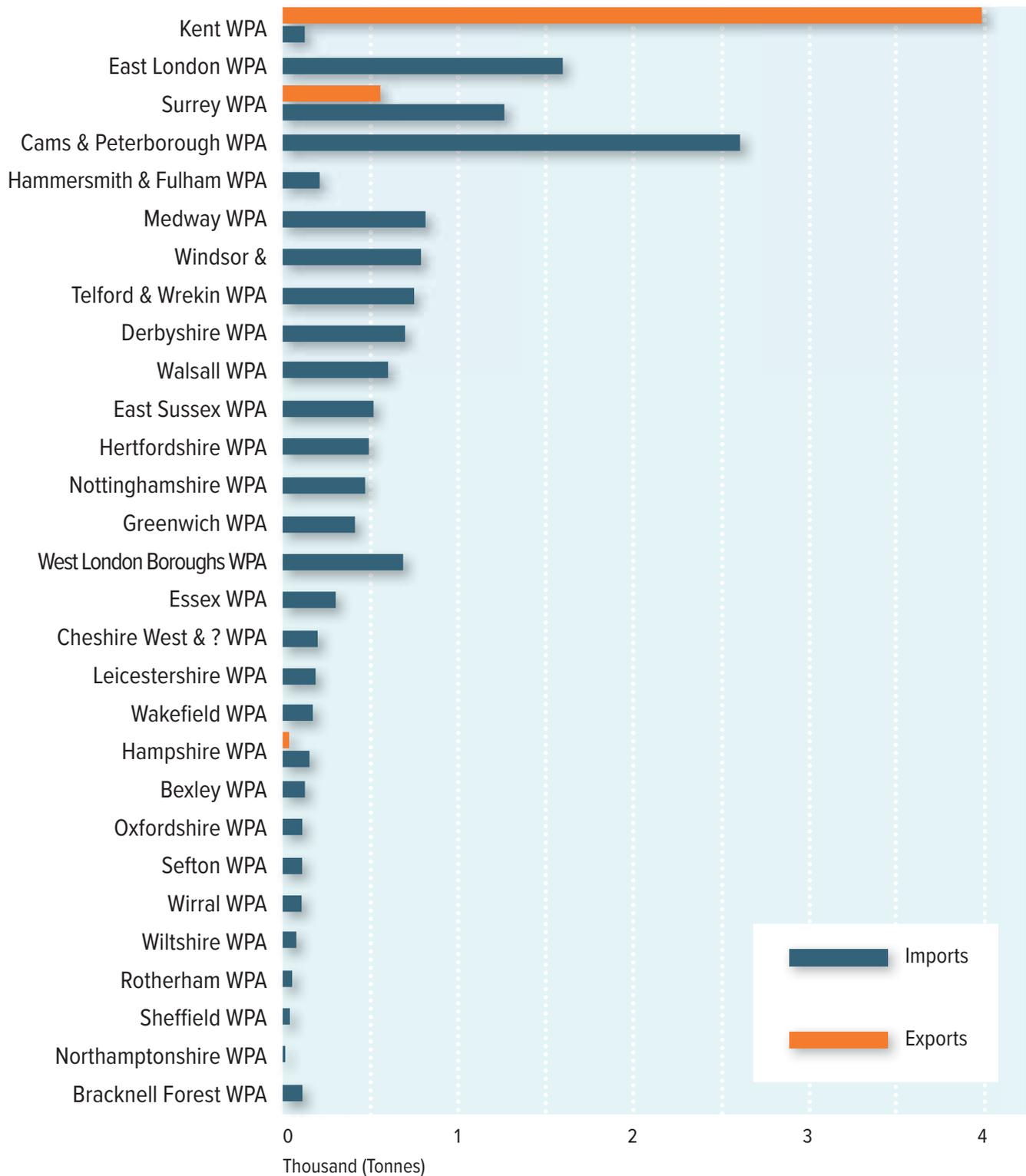
Figure 5 South London Waste Plan Imports of CD&E Waste in 2017 (tonnage)



3.9 Although it initially appears from the data that the SLWP area is a net importer of waste, most of the imported waste tonnage for both household/ commercial and industrial waste (89%) and construction, demolition and excavation waste (77%) is not attributed to specific Waste Planning Authorities. Some of this waste is likely to have been generated within the SLWP boroughs themselves.

3.10 Hazardous waste, such as from healthcare, oil, solvents and other building materials, requires specialist facilities for treatment and disposal so may travel further than other types of waste as there are fewer and more dispersed specialist facilities required to deal with the lower tonnages. South London is a net exporter of hazardous waste; in 2017 the SLWP exported 20,200 tonnes and imported 800 tonnes.

Figure 6 South London Waste Plan Imports and Exports of Hazardous Waste by Waste Planning Authority in 2017 (tonnes)



3.11 The task for the South London Waste Plan boroughs is to ensure that net self-sufficiency can be achieved and those facilities which receive South London waste are able to do so into the future.

## Key Issue 2 How much waste must the South London Waste Plan plan for?

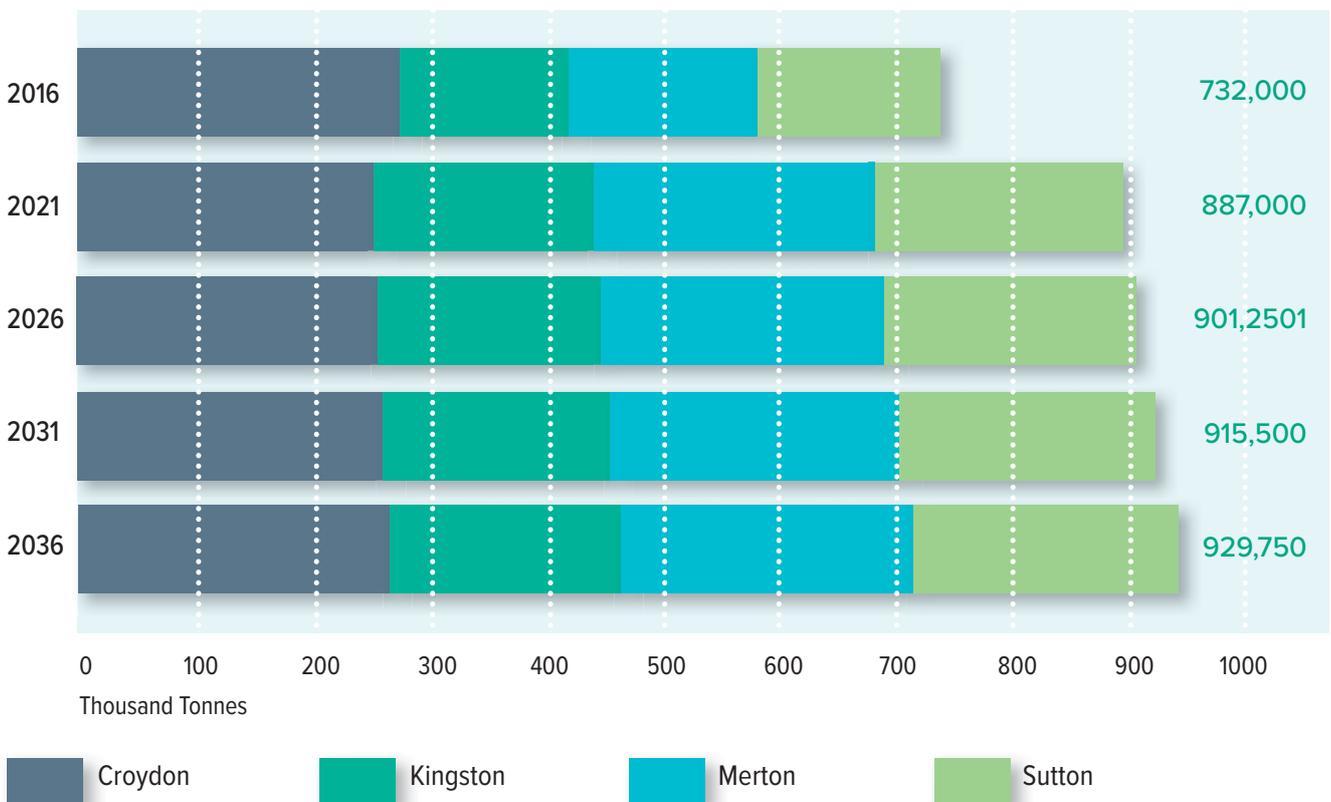
3.12 The National Planning Policy for Waste and the associated guidance requires waste planning authorities to plan for seven waste streams:

3.13 **Local Authority Collected Waste (LACW)**, also known as municipal or household waste: Waste collected by a Local Authority, including recycling, household and trade waste.

3.14 **Commercial/industrial:** non-hazardous waste produced by shops, businesses and industry.

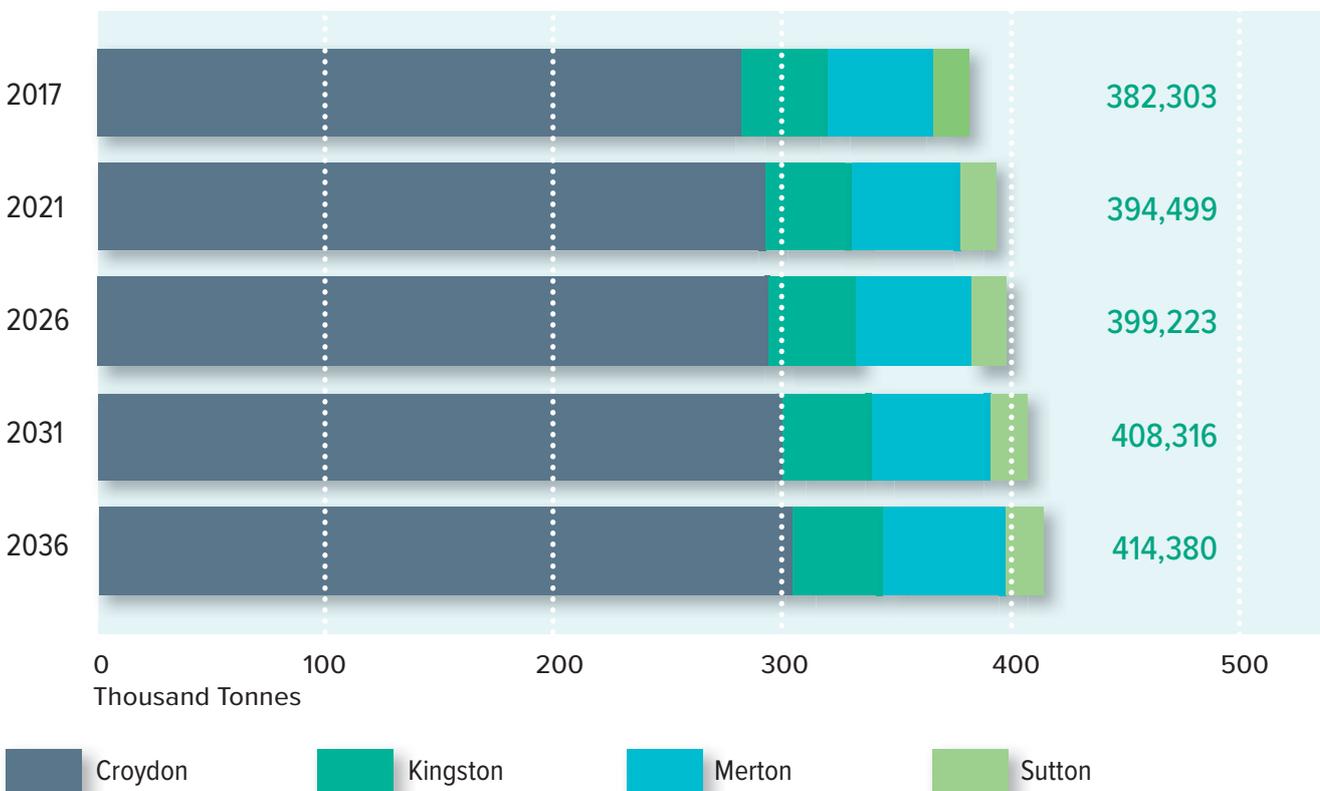
3.15 These two waste streams are collectively the largest amount of waste produced in the SLWP area; both make up the draft London Plan 2019 apportionment targets. Most of the boroughs within the SLWP area have been set apportionment targets higher than their anticipated waste arisings and collectively the apportionment is higher than the anticipated arisings. The South London Waste Plan Technical Report 2019 has therefore used the higher draft London Plan 2019 apportionment targets for each SLWP authority as a more accurate and up-to-date target of what has to be planned for. As set out in Figure 7 below, the South London Waste Plan boroughs must plan for facilities to manage a target of 929,750 tonnes of apportioned waste (Local Authority Collected Waste and Commercial and Industrial Waste) by 2036.

Figure 7 Household, Commercial & Industrial Waste Targets (tonnes)



**3.16 Construction, Demolition & Excavation:** soil, concrete, brick, plastic, wood and other waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures. This is the third largest waste stream and the amount of waste produced each year is highly influenced in London by the strength or weakness of London’s housebuilding and commercial property development market. The London Plan sets a target that London will recycle and re-use 95% of Construction and Demolition Waste by 2020. The London Plan excludes excavation from the net self-sufficiency target as it is to recycle this waste stream in a London context. The South London Waste Plan Technical Report 2019, chapter 4, sets out how the overall Construction and Demolition Waste arisings in the South London Waste Plan area has been forecast using GLA’s employment figures in the construction sector until 2036. By 2036 a total of 414,380 tonnes of Construction and Demolition waste should be managed in the South London Waste Plan area.

Figure 8 Construction and Demolition Waste Targets (tonnes)



**3.17 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. However, as the text for Policy WP2 explains, there are either satisfactory arrangements in place, the waste stream is so small as to be insignificant or capacity improvements have already been made.

**3.18** The task for the South London boroughs is to provide sufficient capacity for those waste streams which will need additional capacity to meet their 2036 target.

## Key Issue 3: Scarcity of Land

- 3.19 In south London, any requirement for waste facilities must be considered and balanced against the land needs of other land uses.
- 3.20 The four SLWP boroughs may all see a substantial increase in their share of London's housing needs if the 2018 draft London Plan's housing targets are found sound. Each borough may need to plan for a substantial number for new homes, in some cases more than 200% additional homes than the current London Plan and with new housing comes the associated schools, healthcare, jobs and businesses and recreational areas that are essential to support a functioning city, a good quality of life and the sustainable development required by the National Planning Policy Framework. South London is also well known for its green and open spaces. Croydon, Kingston and Sutton all have Green Belt, which has some of the highest levels of planning protection from development and 33% of Merton is protected green space, such as Wimbledon and Mitcham Commons.
- 3.21 In the context of a huge increase in demand for land for new homes and associated infrastructure and the protection of green and open spaces, south London is also in demand for industrial land. Due to the shortage of available land for business and industry when compared with demand, the draft London Plan 2018 classifies Croydon, Kingston and Merton to retain their industrial capacity and Sutton to provide more capacity. In the context of the demand for scarce land from all sides, it will be necessary to plan sufficiently for waste within the SLWP boroughs and not sterilise industrial land for other uses with unnecessary waste designations.
- 3.22 Despite the difficulties, there are some positives that can be observed. The SLWP boroughs have worked together on the South London Waste Plan 2011-2021. During these 10 years sites for waste management have been delivered in accordance with the sites and areas set out in the SLWP 2012. Modern waste facilities are more efficient in their layout, processing capability and landtake. This means waste facilities take less industrial land than in recent years.
- 3.23 The task for the south London boroughs is to provide sufficient management capacity for waste uses but ensure that they do not stifle other land uses with high land demand.





## Key Issue 4: Waste Transfer Facilities

- 3.24 Given that the aim of the South London Waste Plan is to manage more waste within the plan's borders, thus supporting the Mayor of London's targets for greater self-sufficiency, and that logistics and travel is increasingly expensive, the need to transfer waste to facilities outside the plan area will change as more reuse, recycling and management facilities are developed. In practice, as set out in the South London Waste Plan Technical Report 2019 and based on Environment Agency data, most waste sites that operate mainly for the transfer of waste to other areas also have a waste management facility on-site, such as a bulking or materials recovery facility to assist with sorting and recycling.
- 3.25 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples set out in the South London Waste Plan Technical Report 2019 include the continuing transfer of hazardous waste to a small number of specialist treatment facilities outside London, or the transfer of waste to an existing recycling facility located in close proximity, but just outside the plan area's borders. Although the South London Waste Plan boroughs acknowledge that as much of their own waste as practicably possible should be managed within its boundaries, the South London Waste Plan should be sufficiently flexible to support transfer where waste cannot reasonably be treated within the plan area, or where the negative environmental impacts of doing so are greater than other options.
- 3.26 Transfer stations operated by waste management contractors tend to bulk collected wastes before transporting to other facilities for, for instance, landfilling, energy recovery or separation for recycling. As such this capacity does not count towards the London apportionment. However, many transfer stations do practise separation of recyclates from waste materials before they are bulked for onward transport. To properly recognise this additional recycling activity, the South London Waste Plan Technical Report 2019 has used Environment Agency data for five years to 2017 to produce an average recycling rate practiced within the waste transfer facility. The average recycling rate has then been counted towards the apportionment target and not as waste transfer. As the costs of materials and travel rise (particularly in London via initiatives such as the Ultra Low Emissions Zone expansion) this will further support the circular economy approach and result in a greater financial imperative to reduce waste and reuse waste materials.
- 3.27 The task for the South London boroughs is to encourage more reuse and recycling on waste transfer stations.

## Key Issue 5: Climate Change, the End of Landfill and the Circular Economy

- 3.28 As started by the South London Waste Plan 2011, the South London Waste Plan Issues and Preferred Options proposes to reduce the reliance on disposal to landfill sites both within the plan area and outside London. Therefore, this South London Waste Plan Issues and Preferred Options document proposes:
- Not to safeguard the Beddington Farmlands landfill site as it is due to close in 2023 and its waste will be managed higher up the waste hierarchy as other recovery rather than disposal
  - To seek to reduce the amount of Construction and Demolition Waste going to landfills in Surrey.
- 3.29 Tackling climate change is a key Government priority for the planning system and a driver for all South London Waste Plan boroughs. The South London Waste Plan boroughs are all focused on the challenges posed by climate change and are driven by the requirements to mitigate and adapt to the effects of climate change. While it is recognised that waste management facilities will continue to generate CO2 emissions, the Draft London Plan 2018 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
- 3.30 The South London Waste Plan boroughs support The Mayor's Environment Strategy 2019 and draft London Plan 2018 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 products - from lawnmowers to window glass – has been identified as having a positive impact on businesses, jobs and the economy as well as reducing waste. London and other cities are prime locations for moving from a linear to a circular economy due to the expense and traffic pollution incurred in transferring goods. Activities are taking place in South London boroughs to move towards a more circular economy include the reuse of materials recovered from extensive building demolition that might previously have ended up as Construction, Demolition and Excavation waste.
- 3.31 The tasks for the South London boroughs is to continue their work to reduce the amount of waste going to landfill, make major waste developments zero carbon, make minor waste developments as close to zero carbon as possible and finally provide opportunities for the circular economy to expand.





## Vision and Objectives

- 4.1 The key issues identified in the previous chapter have informed the four South London Waste Plan boroughs vision and objectives for the South London Waste Plan and these are set out below:

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient in terms of waste generation and waste management for all types of waste. In addition, the South London Waste Plan area will be playing its part in managing London's Household and Commercial and Industrial Waste within the capital's boundaries.

The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated as far as it is possible to do so. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates.

**Question Vision** Do you agree with the draft Vision?

- 4.2 To achieve this vision, the South London Waste Plan has the following objectives:
- Meet the Draft London Plan target for Household and Commercial and Industrial Waste
  - Meet the identified needs for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.
  - Safeguard existing waste sites to meet these targets and needs on existing sites
  - Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates
  - Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity
  - Ensure the effects of new development are mitigated and, where possible, enhance amenity

**Question Objectives** Do you agree with the draft Objectives?





## WP1 Strategic Approach to Household and Commercial and Industrial Waste

### London Plan Arisings and Apportionment Targets

5.1 The boroughs' targets for Household and Commercial and Industrial Waste are set by the Mayor of London and the boroughs are using the Draft London Plan (July 2019) waste arisings and apportionment targets as these are the most up-to-date targets. The Mayor forecasts the amount of Household Waste produced by a borough as follows:



5.2 The amount of Commercial and Industrial Waste produced by a borough is calculated as follows:



5.3 However, the Mayor of London then redistributes portions of the borough arisings between boroughs, giving those boroughs he considers to have more scope to manage waste a higher waste management target (or apportionment) and those he considers has less scope to manage waste a lower waste management target. The Mayor used the following criteria for apportioning or redistributing waste between boroughs: existing waste facilities and industrial land, arisings in a borough, presence of railheads and wharves, proximity to major routes, restrictive land designations (such as heritage or biodiversity), flood risk and socio-economic factors. The South London Waste Plan boroughs objected to these criteria at the Draft London Plan Examination-in-Public on the grounds that the criteria did not take account of whether industrial land was vacant or occupied and the socio-economic factors were unfounded (see [https://www.london.gov.uk/sites/default/files/m69\\_rb\\_kingston\\_2607\\_lb\\_croydon\\_5622\\_lb\\_merton\\_2565\\_lb\\_sutton\\_2044.pdf](https://www.london.gov.uk/sites/default/files/m69_rb_kingston_2607_lb_croydon_5622_lb_merton_2565_lb_sutton_2044.pdf)).

5.4 The Mayor of London’s arisings and apportionment targets for the South London Waste Plan boroughs are set out in Figure 11.

Figure 11 Arisings and Apportionment at 2021 and 2036 (tonnes per annum)



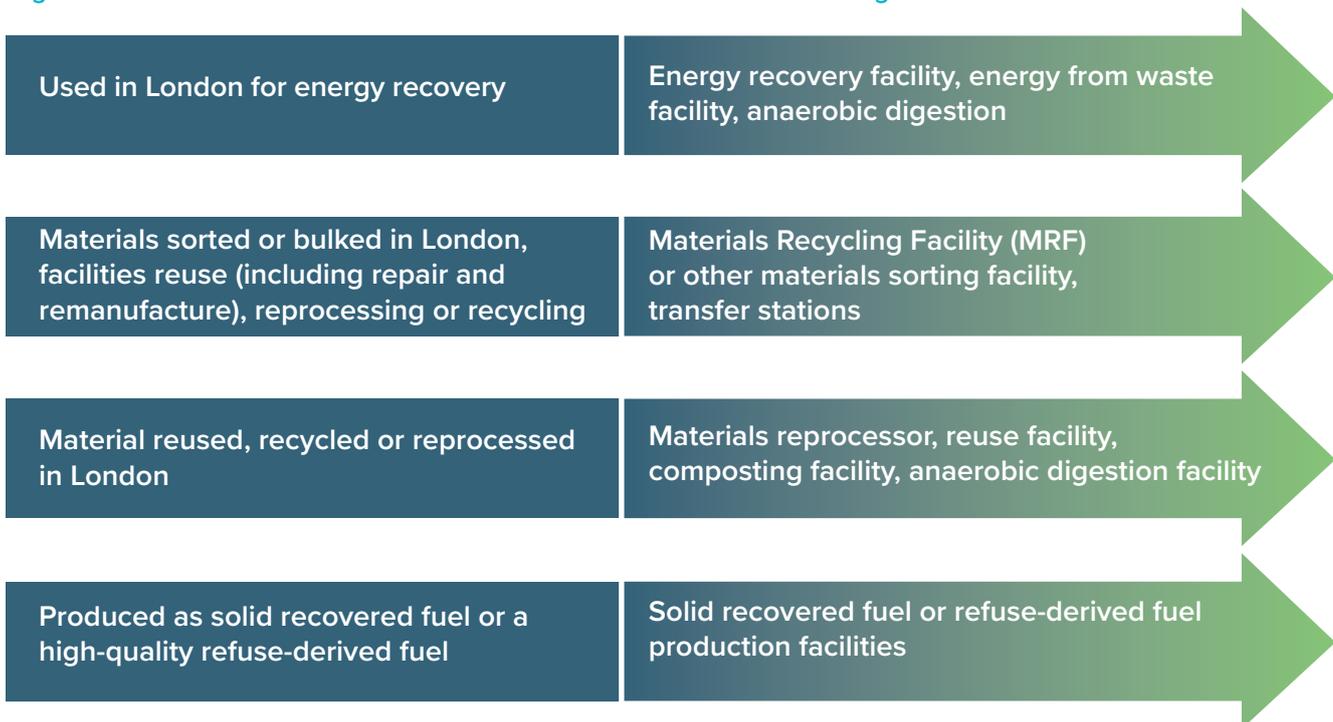
	2021		2036	
	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	320,000	264,000
Kingston	152,000	187,000	157,000	196,000
Merton	173,000	238,000	180,000	249,250
Sutton	161,000	210,000	168,000	220,500
<b>TOTAL</b>	<b>791,000</b>	<b>887,000</b>	<b>825,000</b>	<b>929,750</b>

5.5 In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generate.

### Existing Capacity

5.6 Appendix 1 shows the existing capacity for waste management across the four South London Waste Plan boroughs. The figures have been calculated by Anthesis consultants for the four boroughs and what constitutes waste management and what sort of facilities provide waste management are set out in Figure 12.

Figure 12 Processes and Facilities which Contribute to Waste Management



5.7 Appendix 1 also shows that the current existing capacity for Household and Commercial and Industrial Waste is sufficient to meet the Mayor's apportionment, with the figures reproduced in Figure 13.

**Figure 13 Capacity, Target and Oversupply for Household and Commercial and Industrial Waste**



### Approach to Meeting the Target

- 5.8 Since the four South London Waste Plan boroughs have sufficient waste management capacity to meet their 2036 target, it is proposed to safeguard the existing sites and allow the intensification of the existing sites where appropriate. Unlike the previous South London Waste Plan, the sufficient existing capacity means that the boroughs have no need to identify additional sites for waste management and no need to identify areas which may be suitable for waste management. As all the boroughs have a high demand in their industrial areas for other employment-generating uses, this is especially important for the South London Waste Plan boroughs. With industrial land in high demand, the South London Waste Plan boroughs do not want to be sterilising sites in industrial areas from other employment uses by unnecessarily designating waste sites.
- 5.9 Therefore, in accordance with Paragraph 3 of the National Planning Policy for Waste (which requires local authorities to plan for waste) the Draft London Plan (July 2019) apportionment targets and this plan's objectives:

#### **WP1 Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste**

- The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
- During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the Draft London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.
- The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging intensification of these sites as appropriate (see Policy WP3).
- New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).

**Question WP1** Do you agree with Policy WP1?

## WP2 Strategic Approach to Other Forms of Waste

5.10 In addition to Household and Commercial and Industrial Waste, the Planning Practice Guidance (Paragraph 013 Reference ID: 28-013-20141016) also requires local authorities to plan for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.

### Construction and Demolition Waste

- 5.11 Construction and Demolition Waste is mainly made up of soils, stone, concrete, brick and tile although other waste, such as wood, metals, plastic and cardboard can be found in the waste stream as well. The data regarding Construction and Demolition Waste is poor. Arisings are calculated by employment forecasts for the construction industry, which can be highly susceptible to fluctuations as a result of the health or otherwise of the regional and national economy. Capacity is also difficult to measure as it is suspected that a lot of the recycling or reuse of Construction and Demolition waste takes place on the construction site itself or at waste management facilities with exemptions from Environment Agency permits.
- 5.12 Nevertheless, consultants Anthesis have produced a forecast of Construction and Demolition Waste for the South London Waste Plan boroughs and this is set out in Figure 14.

Figure 14 Construction and Demolition Waste Arisings and at 2021 and 2036 (tonnes per annum)



	2021 Arisings	2036 Arisings
Croydon	292,970	304,695
Kingston	37,887	39,040
Merton	47,975	54,038
Sutton	15,667	16,607
<b>TOTAL</b>	<b>394,499</b>	<b>414,380</b>

5.13 Appendix 1 shows the existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and it shows there is a shortfall not only for the 2036 forecast but also for the 2021 forecast. The exact figures are set out in Figure 15.



5.14 The South London Waste Plan boroughs consider that the shortfall could easily be remedied on the existing safeguarded sites because:

- The throughput for many of the facilities which manage Construction and Demolition Waste does not count towards the waste management totals (because they are primarily involved in waste transfer operations); and/or
- These sites are significantly underutilising their potential capacity.

5.15 Figure 16 shows the waste facilities which manage Construction and Demolition Waste and how they are underperforming.

Figure 16 Construction and Demolition Waste Facilities and Throughput Potential (tonnes per annum)

Site	Maximum	Licence	Throughput counting towards Apportionment
<b>C1</b> Able Waste Services	46,463	74,999	43,268
<b>C4</b> Days Aggregates	179,300	249,999	0
<b>C5</b> Factory Lane Waste Transfer Station*	19,736	200,000	5,206
<b>M1</b> B&T@Work	3,729	5,000	0
<b>M6</b> George Killoughery	71,253	74,999	0
<b>M7</b> LMD Waste Management	24,999	74,999	20,774
<b>M8</b> LMD Waste Management	38,738	50,000	33,845
<b>M9</b> Maguire Skips	58,150	74,999	0
<b>M10</b> Maguire Skips	53,313	74,999	42,856
<b>M11</b> Morden Transfer Station	39,950	74,999	0
<b>M12</b> NJB Recycling	48,687	75,000	18,030
<b>M13</b> One Waste Clearance*	20,000	75,000	4,547
<b>M14</b> Reston Waste Transfer and Recovery	71,595	74,999	30,131
<b>M17</b> UK and European (Ranns) Construction	804	75,000	0
<b>S1</b> 777 Recycling Centre*	56,912	372,600	32,972
<b>S5</b> Hinton Skips*	8,000	75,000	1,819
<b>S8</b> King Concrete	1,060	74,999	0
<b>S9</b> Premier Skip Hire*	12,000	75,000	2,728
<b>S10</b> Raven Recycling	15,224	74,999	5,506
<b>TOTAL</b>	<b>769,913</b>	<b>1,927,590</b>	<b>241,682</b>

\* Also manages Household and Commercial and Industrial Waste, which counts towards that apportionment



5.16 Figure 15 shows the 172,698 tonnes per annum shortfall at 2036 could be easily eradicated if some of the sites refocused their operations from transfer to management and processed to their maximum throughput achieved over the past five years. Similarly, the shortfall for Construction and Demolition waste management could also be eradicated if some of the facilities processed waste at volumes close to their licensed capacities. The South London Waste Plan boroughs are aware that not all sites will be able to intensify but the boroughs consider there is scope on some of 19 sites in Figure 8 to remove the shortfall. There is also the possibility that market forces may incentivise some waste facilities currently providing the overcapacity in the Household, Commercial and Industrial Waste stream to switch to Construction and Demolition Waste.

### Low Level Radioactive Waste

5.17 Low Level Radioactive Waste commonly occurs in paper, plastics and scrap metal that have been used in hospitals, research establishments and the nuclear industry. There are currently no specific facilities for processing such waste within the South London Waste Plan area. Within the area, there are 10 organisations with permits to keep and use radioactive facilities. According to the Pollution Inventory Dataset (2017), only seven are active in the keeping and using of Low Level Radioactive Waste and all are hospitals or medical research establishments. Most Low Level Radioactive Waste is in the form of dust which can be washed off and therefore, these hospitals and research establishments have permits to discharge small amounts of permitted radioactive wastewater to the sewer. There are no solid transfers of this type of waste in any of the facilities. Therefore, this evidence places no requirement on the South London Waste Plan boroughs to provide for solid waste management infrastructure.

### Agricultural Waste

5.18 The Waste Data Interrogator identified that only 383 tonnes of agricultural waste was generated in the South London Waste Plan boroughs in 2017. Given the relatively small tonnage of this waste, the fact that it can be mixed with Commercial and Industrial Waste and Construction and Demolition Waste and that it is often dealt with by Commercial and Industrial and Construction and Demolition waste facilities, there is no need for the South London Waste Plan boroughs to provide for this waste stream.

## Hazardous Waste

5.19 Hazardous waste is categorised as waste which is harmful to human health either immediately or over a period of time. Typically, hazardous waste can include asbestos, chemicals, oil, electrical goods and healthcare waste. All hazardous waste has to be treated in specialist facilities and so often this waste may travel further than non-hazardous waste to reach the appropriate specialist facility. Figure 17 shows the hazardous waste arisings in the South London Waste Plan area, which are already counted within the Commercial and Industrial and Construction and Demolition waste streams. Given that the waste generation in South London is small, its projected increase is small and that the small quantity of waste is already being managed by specialist facilities outside the area, there is no requirement on the South London Waste Plan boroughs to provide any hazardous waste treatment facilities

Figure 17 Hazardous Waste Arisings and at 2021 and 2036 (tonnes per annum).

		2021 Arisings	2036 Arisings
	<b>Croydon</b>		9,008
<b>Kingston</b>		2,404	2,432
<b>Merton</b>		4,591	4,685
<b>Sutton</b>		5,239	5,303
<b>TOTAL</b>		<b>21,242</b>	<b>21,612</b>

## Wastewater

5.20 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and manages the sewerage infrastructure as well as the sewage treatment works. Figure 18 shows Thames Water's relatively small projected increase in wastewater treatment and sludge volume between 2020 and 2035.

Figure 18 Wastewater and Sludge Generation at 2020 and 2035

	2020		2035	
	Wastewater treated (m <sup>3</sup> /year)	Sludge (total dissolved solids/year)	Wastewater treated (m <sup>3</sup> /year)	Sludge (total dissolved solids/year)
<b>Croydon</b>	11,179,842	6,309	11,570,942	6,552
<b>Kingston</b>	10,938,459	5,429	11,378,691	5,666
<b>Merton</b>	9,657,944	5,685	10,240,412	6,059
<b>Sutton</b>	21,113,960	11,547	22,545,500	12,366
<b>TOTAL</b>	<b>52,890,205</b>	<b>28,970</b>	<b>55,735,545</b>	<b>30,643</b>

5.21 The four boroughs are served by Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works. Thames Water has informed the South London Waste Plan boroughs that these works all have adequate capacity to manage the incoming sewage and have all had major capacity increases recently. Between 2020 and 2025, Thames Water plans general capital maintenance projects and, specifically at the Hogsmill Sewage Treatment Works, biodiversity enhancements and a replacement to the combined heat and power plant.

5.22 Therefore, in accordance with national planning practice guidance, the Draft London Plan (July 2019) and this plan's objectives:

### WP2 Strategic Approach to Other Forms of Waste

- (a) Development that results in the intensification of existing sites to provide additional Construction and Demolition waste management capacity will be supported, subject to Policy WP3(b).
- (b) New sites (either transfer or management) for Construction and Demolition waste should be for compensatory provision only (see Policy WP3).
- (c) New sites (either transfer or management) will not be supported for radioactive waste, agricultural waste and hazardous waste.
- (d) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan plan and the relevant borough's Development Plan.



**Question WP2** Do you agree with Policy WP2?

## WP3 The Safeguarding of Existing Waste Sites

### Safeguarding

5.23 In order to preserve the existing capacity, the South London Waste Plan boroughs will safeguard all the existing waste sites, set out on Pages 42-90, for waste uses and these will be shown on the boroughs' Policies Map.

### Intensification on Safeguarded Sites

5.24 In order to meet the shortfall against Construction and Demolition target and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. However, this will have to be considered against all the relevant policies in a borough's Development Plan. For example, while a redevelopment to increase capacity may be desirable in terms of meeting the target, it may not be desirable with regard to the additional strain that is placed on the local road network. Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the policies in a borough's Development Plan.



### Compensatory Provision

5.25 The Draft London Plan (July 2019) states that “waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used, where this is not available potential capacity of the site should be appropriately assessed” (paragraph 9.9.2). However, this approach may not be effective for the South London Waste Plan area, where industrial land is in high demand. Firstly, it means that a borough outside the South London Waste Plan area can encourage a waste facility to relocate in the South London Waste Plan area, thereby effectively transferring its waste apportionment to the South London Waste Plan area and making the four boroughs a “waste dumping ground”. With the London Plan industrial land forecasts, the South London Waste Plan boroughs do not have the capacity to provide compensatory provision for other boroughs. Secondly, the compensatory provision of the maximum throughput achieved over the last five years is too prescriptive and, in the experience of the South London Waste Plan boroughs, is difficult to implement as there may be other factors as to why the maximum throughput cannot be achieved on a compensatory site, such as site limitations or new contract arrangements. The South London Waste Plan boroughs consider that the amount of compensatory provision for a lost waste site is best considered on a case-by-case basis.

## Waste Hierarchy

5.26 Planning Practice Guidance (Paragraph: 009 Reference ID: 28-009-20141016) states that “driving waste up the Waste Hierarchy is an integral part of the national waste management plan for England and national planning policy for waste. All local planning authorities must have regard to the Plan and national policy in preparing their Local Plans.” In other words, this entails ensuring waste that can be recycled is not used as fuel, ensuring waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of a waste facility means waste operations cannot easily rise up the waste hierarchy be re-used is not recycled and, in the first place, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of waste facility means waste operations cannot easily rise up the waste hierarchy by intensification. The boroughs will attempt to adhere to national and regional guidance but will implement it flexibly on a case-by-case basis.



5.27 Therefore, in accordance with this plan’s objectives:

### WP3 Existing Waste Sites

#### Safeguarding

- (a) The sites set out on Pages 42-90 of this South London Waste Plan will be safeguarded for waste uses only.

#### Intensification

- (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough’s Development Plan.

#### Safeguarding Compensatory Provision

- (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis.
- (d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.

#### Safeguarding Waste Hierarchy

- (e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.

**Question WP3** Do you agree with Policy WP3?

## WP4 Sites for Compensatory Provision

- 5.28 As set out in Policy WP1, the South London Waste Plan expects no new sites for waste use except where they are required for compensatory provision. The location of compensatory sites must be carefully considered.
- 5.29 Policy SI18 of the Draft London Plan (July 2019) suggests that Strategic Industrial Locations and Locally Significant Industrial Locations are suitable locations, while Appendix B of the National Planning Policy for Waste (October 2014) provides further information on locational criteria for waste treatment facilities.
- 5.30 Therefore, in accordance with the National Planning Policy for Waste, the Draft London Plan and this plan's objectives:



### WP4 Sites for Compensatory Provision

Proposals for new waste sites to provide compensatory provision should:

- (a) Demonstrate that the site is capable of providing sufficient compensatory capacity.
- (b) Be located on sites:
  - (i) within Strategic Industrial Locations or Locally Significant Industrial Locations;
  - (ii) not having an adverse effect on nature conservation areas protected by international or national regulations;
  - (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,
  - (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.
- (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;
- (d) Have particular regard to sites which:
  - (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land);
  - (ii) are located more than 100 metres from open space;
  - (iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
  - (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;
  - (v) have direct access to the strategic road network;
  - (vi) have no Public Rights of Way crossing the site;
  - (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views;
  - (viii) offer opportunities to accommodate various related facilities on a single site;
- (e) Include appropriate mitigation measures which will be considered in assessing site suitability;
- (f) Meet the other policies of the relevant borough's Development Plan.

**Question WP4** Do you agree with Policy WP4?



## WP5 Protecting and Enhancing Amenity

- 5.31 Waste facilities have the potential to generate a large number of amenity issues especially in an area as diverse as the plan area which includes urban, suburban and semi-rural built environments. The issues include effects on the built and historic environment, encroachment into open space, flood risk, harm to biodiversity, water quality and unacceptable emissions into the air (both from the plant itself and the traffic movements generated), unacceptable noise and vibration (both from the plant and traffic), litter and vermin and bird population increase.
- 5.32 Waste developments should be well designed and managed to ensure that amenity impacts can be mitigated or prevented. These may be addressed on an ongoing basis through conditions imposed by planning permissions that are granted by planning authorities and environmental permits that are regulated by the Environment Agency. The National Planning Policy for Waste (Paragraph 7) directs waste planning authorities to “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced”
- 5.33 The National Planning Policy Guidance (Paragraph: 050 Reference ID: 28-050-20141016) advises planning authorities that “before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body.” Consequently, in the consideration of waste facility applications, each borough will seek advice from the Environment Agency and other agencies as appropriate. In addition, developers are encouraged to contact the appropriate partner borough, the Environment Agency and Natural England prior to submission of an application to discuss all relevant matters and to engage in early public consultation on a proposal.
- 5.34 Waste developments should be designed paying particular attention to how the design of a facility can enhance the local environment and mitigate amenity issues. For instance, waste activities should be within a fully enclosed and covered building and the impact may be further limited by considering setting, hard and soft landscaping, height, bulk and massing, detailing, materials, lighting and boundary treatments.
- 5.35 Therefore, in accordance with the National Planning Policy for Waste and this plan’s objectives:

### WP5 Protecting and Enhancing Amenity

- (a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.
- (b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.
- (c) Particular regard will be paid to the impact of the development in terms of:
  - (i) The Green Belt, Metropolitan Open Land, recreation land or similar;
  - (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
  - (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
  - (iv) Groundwater, surface water and watercourses;
  - (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;
  - (vi) Noise and vibration from the plant and traffic generated;
  - (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;
  - (viii) Odour, litter, vermin and birds; and,
  - (ix) The design of the waste facility, particularly:
    - complementing or improving the character of an area;
    - limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
    - being of a scale, massing or height appropriate to the townscape or landscape;
    - using good quality materials;
    - minimising the requirement for exterior lighting; and,
    - utilising high-quality boundary treatments.

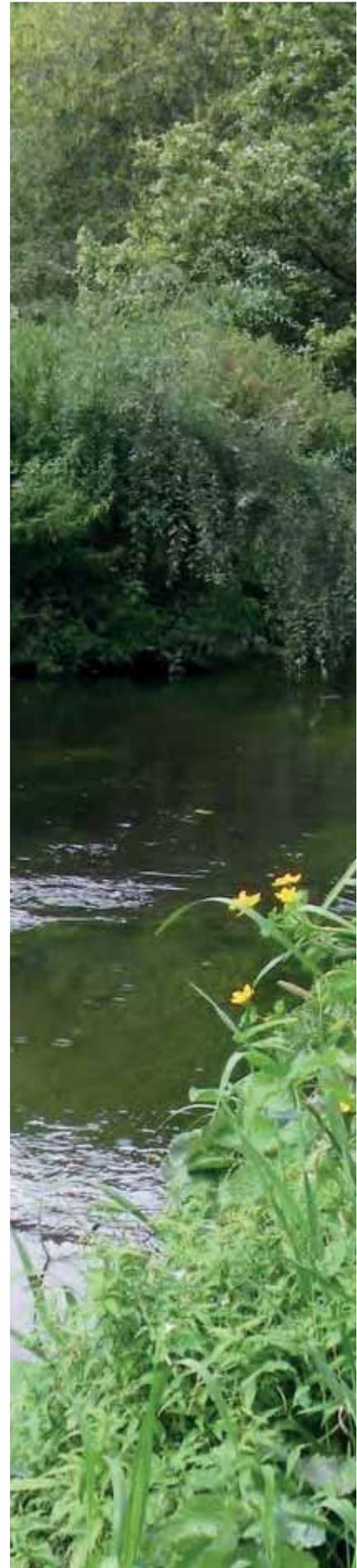
The information in the schedule below will provide the basis for the assessment of the impact of a development.

**Question WP5** Do you agree with Policy WP5?



### Schedule: Information which may be required for a planning application

- 1** Type(s) of waste to be managed at the site, e.g. CD&E and C&I.
- 2** Estimated annual throughput of each type of waste materials and timescale of operations for the current proposals and the estimated maximum capacities for the site, if different.
- 3** Estimated capacity of the site
- 4** Method of working. The annual throughput per treatment method, e.g. Transfer, MRF, AD.
- 5** Markets to be served
- 6** Present use, conditions and ground levels of the site and its surroundings.
- 7** Site layout, means of access, the design and siting of buildings and fixed and mobile machinery to be used
- 8** Hours of operation
- 9** Statement of Community Involvement
- 10** Preliminary assessment of BREEAM standard, undertaken by a BRE accredited assessor and commitment to submit a design stage certificate before construction can start on site and to undertake a post-construction review
- 11** Energy Assessment, including an assessment of energy demand and CO2 emissions
- 12** Assessment of the impact of the proposed development on the built and historic environment
- 13** Archaeological evaluation
- 14** Landscape assessment and landscaping proposals, including screening, landscaping works and boundary treatments
- 15** Tree Survey/Arboricultural Report
- 16** Biodiversity Assessment would be required where proposals are likely to affect nature conservation areas such as a: National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Metropolitan, Borough or Local Importance for Nature Conservation, or Green Corridors.
- 17** Topographical Survey
- 18** Geological Assessment
- 19** Hydrological and hydrogeological assessment
- 20** Flood Risk Assessment
- 21** Site drainage details





- 22** Air Quality Impact Assessment, demonstrating the effects on air quality in the locality of a proposed site arising from the operation of the site and vehicles movements to and from it.
- 23** An assessment which identifies potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, and which identifies the mitigation measures to be used to minimise the effects of those nuisances.
- 24** Noise Impact Assessment
- 25** Sustainability Statement
- 26** Circular Economy Statement
- 27** Job creation details, including skills, training and apprentice opportunities
- 28** TV and Radio Reception Impact Assessment
- 29** Measures to prevent new or increased risk to aviation from the proposed development
- 30** Measures for protecting Public Rights of Way
- 31** Transport Assessment
- 32** Travel Plan
- 32** Route Management Strategy
- 33** Access Strategy
- 34** Delivery Servicing Plan/Freight Plan
- 35** Construction Logistics Plan
- 36** Highway safety measures
- 37** Design and Access Statement
- 38** Restoration, after care, after use and long-term management provision
- 39** An Environmental Impact Assessment may also be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 40** A Habitats Regulations Assessment, if the relevant borough and Natural England consider it may affect a European-designated site. European sites which may be affected are:
- The Richmond Park SAC
  - The Wimbledon Common SAC
  - The Mole Gap to Reigate Escarpment SAC
  - The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA)
- 41** Any other requirements from the relevant borough's Validation List

## WP6 Sustainable Design and Construction of Waste Facilities

- 5.36 A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation. “Designing Waste Facilities - A Guide to Modern Design in Waste” (DEFRA, 2008) states: “There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?” In addition, Policy S12 of the Draft London Plan (July 2019) provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change.
- 5.37 In terms of standards, the Building Research Establishment (BRE) has established a range of BREEAM schemes for rating the overall environmental performance of different types of non-residential buildings. Buildings are rated on a scale of ‘Pass,’ ‘Good,’ ‘Very Good,’ ‘Excellent’ or ‘Outstanding.’ However, there is no specific BREEAM scheme for waste facilities since there are many different technologies and building types. However, BRE advice is that it will be for developers to liaise with the BRE and BRE-accredited assessors in order to identify a suitable ‘bespoke’ BREEAM scheme to suit the particular characteristics of the proposed development. It is considered by the boroughs that many waste facilities should be able to meet the ‘Excellent’ standard. Similar standards should apply if the BREEAM is replaced by another environmental performance rating regime.
- 5.38 The reduction of carbon emissions is a key element of a BREEAM scheme and, in this respect, the Draft London Plan (July 2019) sets out that all major developments should be net zero carbon, including a minimum on-site reduction of at least 35% beyond building regulations 2013 (or equivalent).
- 5.39 Developers should also consider climate change adaptation measures in schemes. “Designing Waste Facilities - A Guide to Modern Design in Waste” also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise:
- **Odours.** With temperature increases, waste will need to be treated more quickly and unenclosed waste facilities (e.g. for composting facilities) will become particularly vulnerable to odour issues.
  - **Heating, Cooling and Energy Use.** Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly. Storage and unoccupied areas may be better placed in the warmest areas of the facility.
  - **Flood Readiness.** Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas. In addition, facilities should incorporate improvements to flood risk management in support of the objectives of the Catchment Flood Management Plan (CFMP) and the partner boroughs’ Strategic Flood Risk Assessments (SFRAs).
  - **Soil Subsidence.** The wetting and drying effect on soil may cause subsidence. Developers may need to consider deeper foundations or piling. Root barriers may be required depending on surrounding vegetation.
  - **Property Damage.** Higher wind speeds leading to structural damage, more intense rain leading to water infiltration and higher peak temperatures leading to blistering, warping and softening may affect the design of a building and the choice of materials.



5.40 In the construction phase of any development, consideration should be given to recycling Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. However, the boroughs are aware that this is not always feasible.

5.41 Therefore in accordance with national and regional advice, the Draft London Plan (July 2019) (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:

#### WP6 Sustainable Construction of Waste Facilities

- (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with the South London Waste Plan and any other relevant policies of the relevant borough's Development Plan.
- (b) Waste facilities will be required to:
  - (i) minimise on-site carbon dioxide emissions in accordance with the Draft London Plan Policy SI2;
  - (ii) be fully adapted and resilient to the future impacts of climate change in accordance with the Draft London Plan Policy GG6 , particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;
  - (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with Draft London Plan Policy G5;
  - (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;
  - (v) minimise waste and promote sustainable management of construction wastes on site; and,
  - (vi) protect, manage and enhance local habitats and biodiversity.

**Question WP6** Do you agree with Policy WP6?

## WP7 The Benefits of Waste

5.42 The 2008 Climate Change Act (amended 2019) sets a target to make UK net zero carbon by 2050. The target will have to be partly achieved by societal changes, such as new technology, waste minimisation and increased rental and sharing, but waste facilities will have a major role to play in achieving the target and can contribute to the circular economy.

### Reuse, Refurbishment, Recycling and By-products

5.43 Therefore, the South London Waste Plan boroughs will encourage waste treatment applications that can lead to a prolonged product life (reuse and refurbishment), can provide secondary materials (remanufacture) or produce by-products, such as biogas from composting and refuse derived fuel and providing combined cooling, heat and power.

### Energy from Waste

5.44 In the London Environment Strategy (Objective 7.4), the Mayor of London states that “achieving reduction and recycling targets will mean that no new energy from waste facilities in London will be needed.” Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted.

### Job Creation and Social Value

5.45 Although the South London Waste Plan boroughs have relatively high employment rates overall, there are pockets of the four boroughs where employment is lower. The intensification of existing waste sites provides an opportunity for increased employment, often within a low employment hotspot. Therefore, the South London Waste Plan boroughs would welcome information on how the intensification may generate additional employment.

5.46 Therefore, in accordance with the London Plan, the London Environment Strategy and this plan’s objectives:

### WP7 The Benefits of Waste

- (a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.
- (b) Waste development for additional Energy from Waste facilities will not be supported
- (c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.

**Question WP7** Do you agree with Policy WP7?



## WP8 Planning Obligations

5.47 Planning Obligations, or Section 106 agreements, are legal agreements negotiated between local authorities and developers or unilateral undertakings made by developers. The use of planning obligations will be in line with the prevailing legislation and guidance and the prevailing policies of the relevant borough.

5.48 In all cases, the boroughs in the plan area will try to use a planning condition to make a proposed development acceptable before resorting to a planning obligation. However, there may be situations where the use of planning conditions is not possible. The following are examples of where a planning obligation may be considered:

- Traffic management measures, including the routing of vehicles;
- Access and highway improvements;
- Provision of infrastructure, including low carbon and decentralised energy networks,
- Carbon offsetting contributions;
- Protection of sites of international, national, regional or local importance;
- Environmental enhancement;
- Flood risk compensation works;
- Archaeological investigation, recording and keeping of artefacts and safeguarding of remains;
- Off-site monitoring of emissions and the water environment; and,
- Provision and management of off-site or advance planting and screening.
- Job brokerage, training and skills to encourage local employment opportunities.

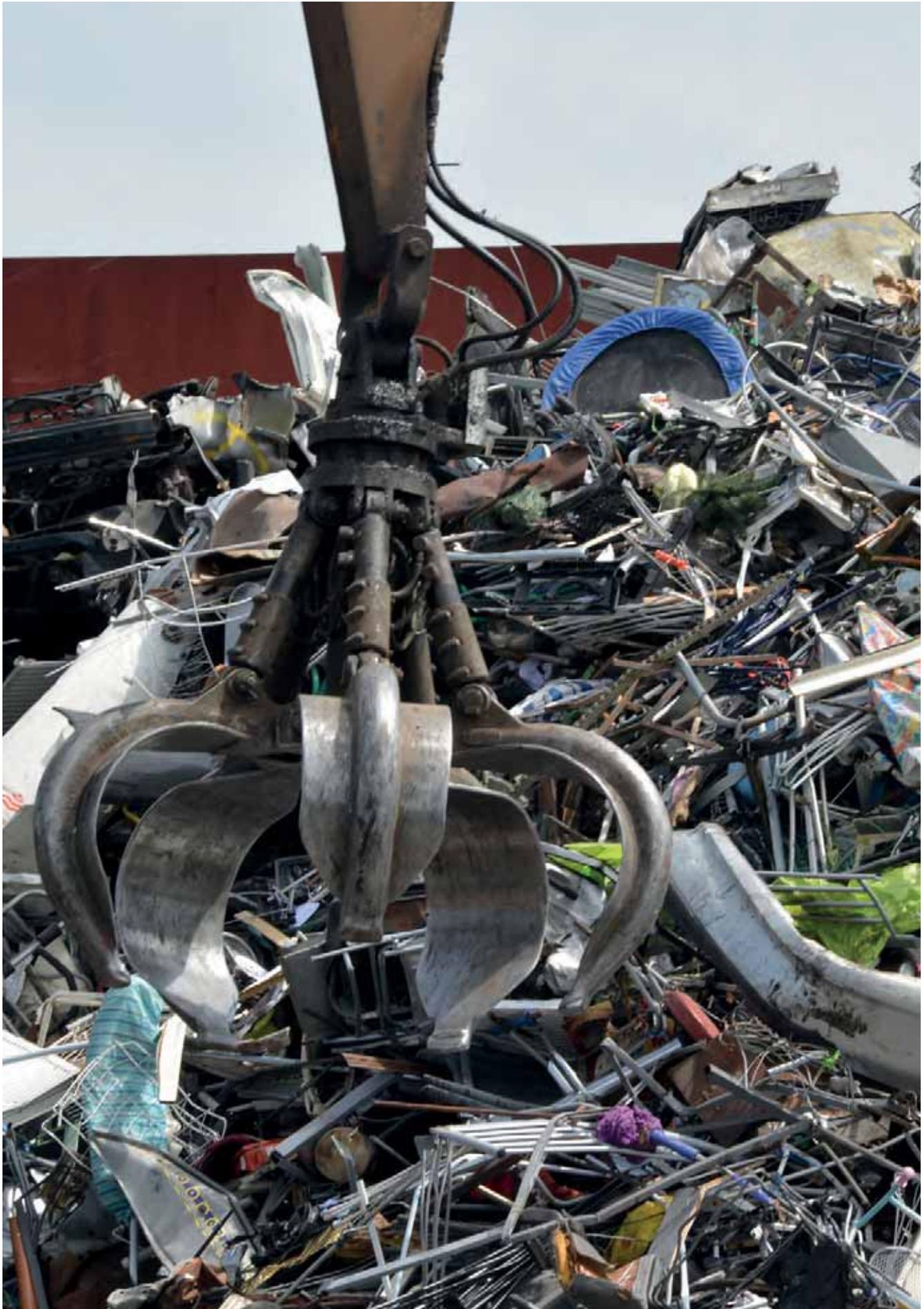
5.49 In addition, dependent on the relevant borough's Community Infrastructure Levy (CIL) Charging Schedule, a waste development may be CIL-liable.

### WP8 Planning Obligations

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.

**Question WP8** Do you agree with Policy WP8?





## How to read the information on Safeguarded Sites

**Site size:** in hectares

**Type of facility:** usually derived from the type of permit granted. There are three types of waste facilities:

- (i) a waste management facility, which reuses, recycles or reprocesses waste and therefore its throughput can count towards the south London target;
- (ii) a waste transfer facility, which processes or sorts waste for management elsewhere. In practice, however, most transfer stations do some management and, where this management capacity is known, it is counted towards the south London target;
- (iii) a waste treatment facility is a general term covering both waste management and waste transfer facilities

**Type of waste accepted:** from the following types:

- (i) household; or
- (ii) commercial and industrial; or
- (iii) local authority collected waste, usually a combination of household and commercial and industrial; or
- (iv) construction and demolition; or
- (v) excavation; or
- (vi) wastewater; or
- (vii) hazardous (eg asbestos, chemicals, oil, electrical goods and some types of healthcare waste)

**Maximum throughput (in tonnes per annum):** The maximum throughput achieved by the site in any one year between 2013 and 2017. The Draft London Plan recommends that boroughs should use this measure to assess capacity

**Licensed capacity (in tonnes per annum):** The maximum capacity for the site from its Environment Agency permit. This is not a reliable guide to capacity as permitted capacities are based on capacity bands into which permits are divided rather than the operating annual capacity of the site, and, therefore, the capacity detailed in the licence tends to be at the top end of the charging bands. Therefore, many sites give permitted capacities of 74,999 tonnes, 24,999 tonnes and 4,999 tonnes and it is likely that such figures used are over estimates of actual operational capacities.

**Qualifying throughput (in tonnes per annum):** This is the element of the maximum throughput which counts as waste management. For it to count as waste management, it must be applicable to one of the London Plan criteria for waste management:

- (i) used in London for energy recovery;
- (ii) materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- (iii) materials reused, recycled or reprocessed in London;
- (iv) produced as a solid-recovered fuel or a high-quality refuse-derived fuel

**Site Description:** A description of the site and its immediate surroundings

**Planning Designations:** The principal and relevant designations covering the site from the relevant borough's Policies Map

**Currently Safeguarded:** Whether the site is safeguarded in the 2011 South London Waste Plan

**Opportunity to increase waste managed:** Whether the site has the scope to increase its capacity to manage waste. This may come from increasing throughput through the reconfiguration of the site. It does not include switching from non-waste management activities (such as sorting) to waste management activities (such as recycling).

**Issue to consider if there is a further application:** The principal issues facing the site if it is redeveloped for additional or a different type of waste treatment. This is unlikely to be the case in most instances. Appendix 1 shows the sites which have been assessed as being able to intensify.

### C1 Able Waste Services, 43 Imperial Way, Croydon CR0 4RR



Site size (ha)	0.45
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	46,463
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	43,268 (C&D)

Not to Scale

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**Site Description** Two-storey office block fronting Imperial Way with modern double-height warehouse to rear. The site lies within the Imperial Way Industrial Estate which comprises a mix of new and 1970s warehouses, mostly two-storey.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded** No

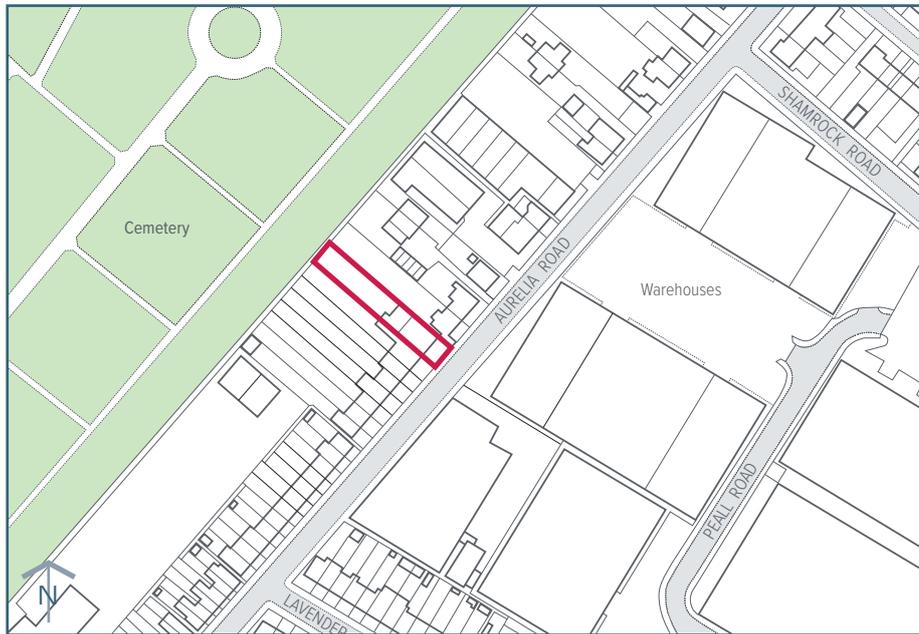
**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank.
- Providing appropriate soft landscaping and regard to the adjacent Roundshaw Park

**Question C1** Do you agree this site should be safeguarded for waste uses?

## C2 Croydon Car Spares, 111 Aurelia Road, Croydon CR0 3BF



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Site size (ha)	0.05
Type of facility	Metal Recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	241
Licensed capacity (tpa)	572
Qualifying throughput (tpa)	241 (HCI)

**Site Description** A small, double-storey interwar workshop.  
 The site is located within a mixed use area. The site has residential properties on both sides and an industrial area/retail park opposite.

**Planning Designations** Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This site is very constrained site and there is no opportunity to expand.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Ampere Way APA
  - Protecting the amenity of those using the nearby locally listed park - Mitcham Road and Croydon Crematorium.
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land

**Question C2** Do you agree this site should be safeguarded for waste uses?

### C3 Curley Skip Hire, Rear of 64 Northwood Road, Croydon CR7 8HQ



Not to Scale

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Site size (ha)	0.07
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	9,294
Licensed capacity (tpa)	10,920
Qualifying throughput (tpa)	0

**Site Description** The site is mainly open skip storage and hardstanding with some single-storey covered areas for sorting waste.

The site lies within a small industrial site located in a predominantly residential area. The units are mainly double and triple-height inter-war sheds.

**Planning Designations** None

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This site is adjacent to site allocations for residential and community uses: Audrey House, 50 Northwood Road (Site Allocation reference 284). The site is therefore not considered suitable for intensification or expansion.

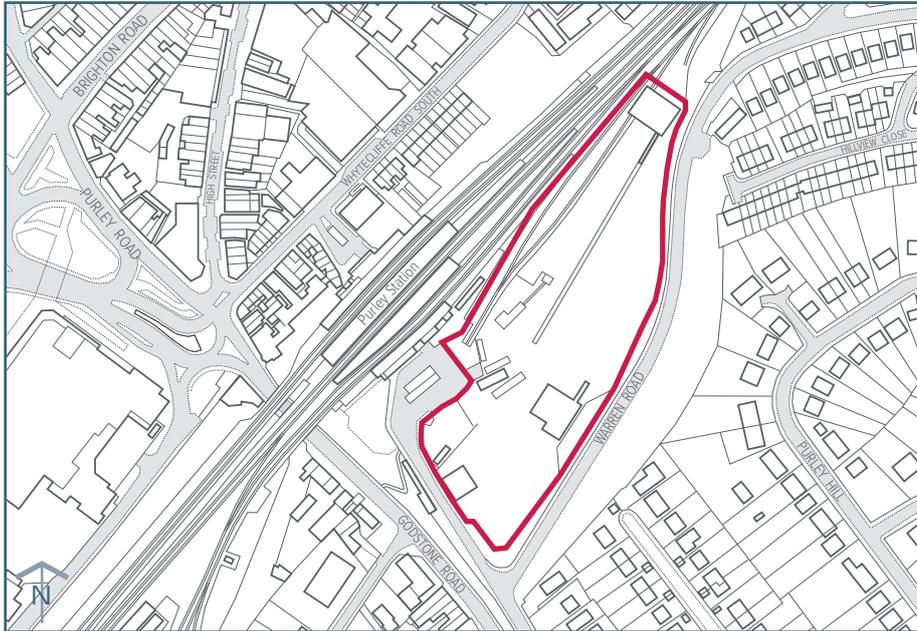
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts and having regard to the future occupiers of the allocated housing site and community use.

**Question C3** Do you agree this site should be safeguarded for waste uses?

### C4 Days Aggregates Purley Depot, Approach Road, Croydon CR8 2AL



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Site size (ha)	2.0
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	179,300
Licensed capacity (tpa)	249,999
Qualifying throughput (tpa)	0

**Site Description** Open aggregates storing, treatment, recycling and storage facility with associated two-storey, mid-century office block and enclosed sheds.  
The site lies adjacent to Purley rail station and is reasonably isolated from nearby

**Planning Designations** Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The railhead makes this site well-suited to its current use. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

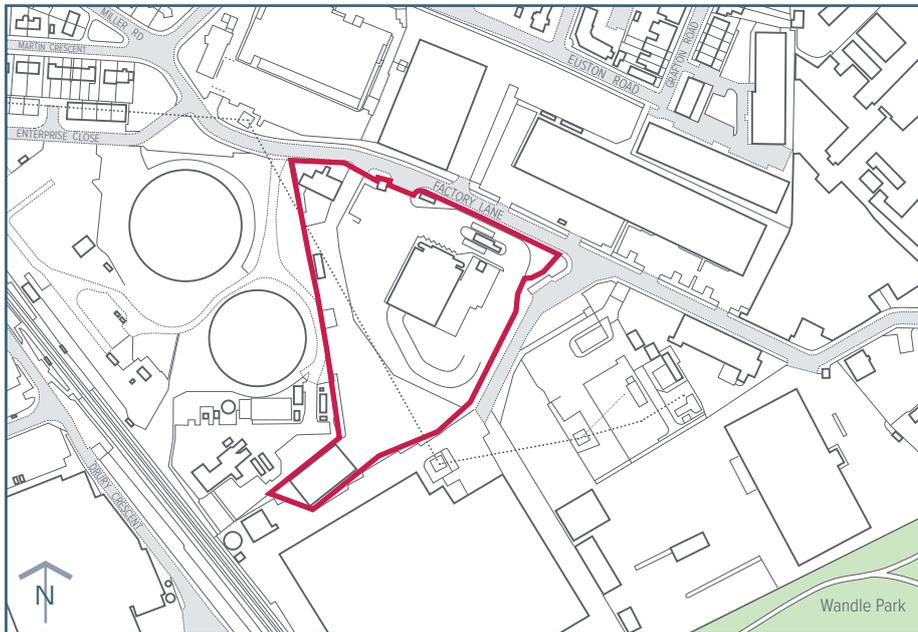
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – London to Brighton Road
- Not harming biodiversity in the vicinity
- Providing appropriate soft landscaping

**Question C4** Do you agree this site should be safeguarded for waste uses?

### C5 Factory Lane Waste Transfer Station, Factory Lane, Croydon CR0 3RL



Not to Scale

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Site size (ha)	1.8
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	19,736
Licensed capacity (tpa)	200,000
Qualifying throughput (tpa)	9,623 (HCI) 5,206 (C&D)

**Site Description**

A large triple-storey building surrounded by hardstanding.

The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycling centre and waste transfer station. Active gas holders lie to the north-west of the site and power lines are overhead.

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded**

Yes – Site reference in 2011 SLWP: 1

**Opportunity to increase waste managed**

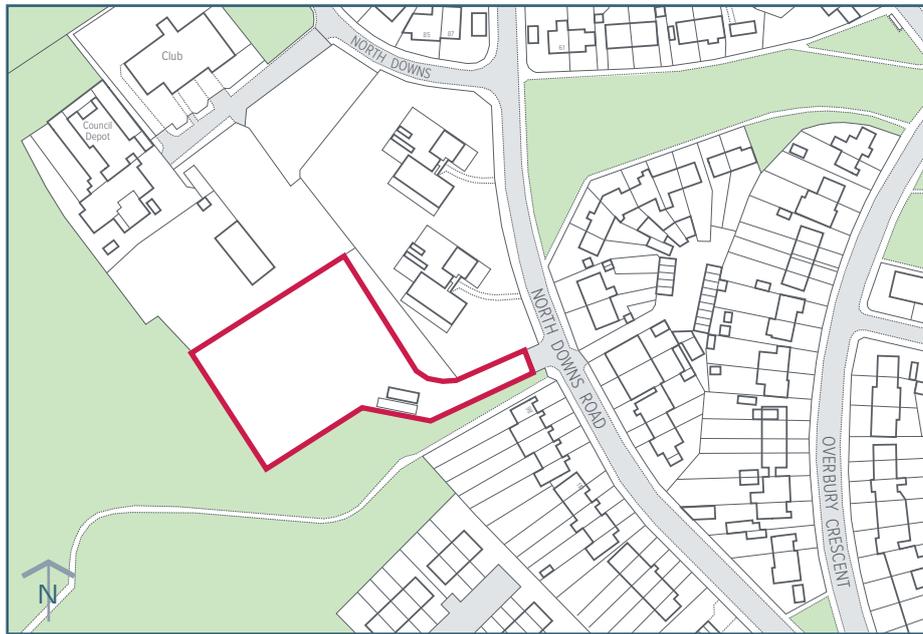
Yes. There are no plans by the South London Waste Partnership to intensify operations at this site. While household reuse and recycling centres have a low throughput per hectare, the site is large and there may be an opportunity to co-locate other waste uses on the site.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any remains in the Ampere Way archaeology priority area
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

**Question C5** Do you agree this site should be safeguarded for waste uses?

### C6 Fishers Farm Civic Amenity Site, North Downs Road, Croydon CR0 0LF



Site size (ha)	0.2
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	6,895
Licensed capacity (tpa)	15,125
Qualifying throughput (tpa)	4,542(HCI)

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**Site Description** Open local authority household reuse and recycling centre  
 Located on the edge of a residential area adjacent to farmland

**Planning Designations** Archaeological Priority Area

**Currently Safeguarded** Yes – Site Reference in SLWP 2011: 2

**Opportunity to increase waste managed** No. There are no plans to intensify

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area
  - Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Riddlesdown
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Green Belt
  - Providing appropriate soft landscaping

**Question C6** Do you agree this site should be safeguarded for waste uses?

### C7 Henry Woods Waste Management, Land adjacent to Unit 9, Mill Lane Trading Estate, Croydon CR0 4AA



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Site size (ha)	0.7
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	12,885
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

**Site Description** Open skip storage and waste sorting  
The site lies within an existing strategic industrial area.

**Planning Designations** Strategic Industrial Area  
Archaeological Priority Area

**Currently Safeguarded** No

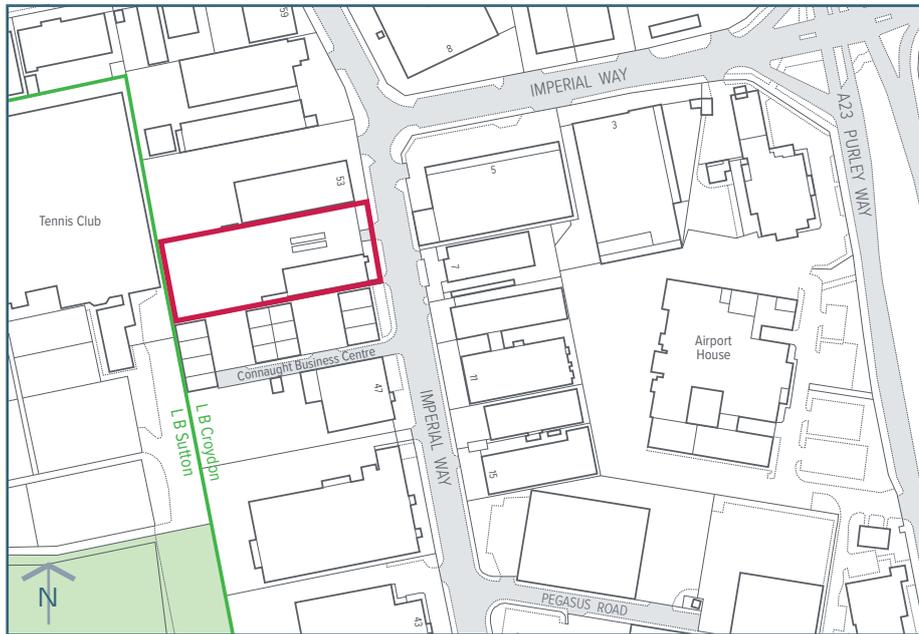
**Opportunity to increase waste managed** No. This is a very constrained site with no opportunity for expansion or intensification

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
  - Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads

**Question C7** Do you agree this site should be safeguarded for waste uses?

### C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR



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Site size (ha)	0.4
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	4,213
Licensed capacity (tpa)	4,999
Qualifying throughput (tpa)	4,213 (HCI)

<b>Site Description</b>	<p>Modern double-height warehouse with adjacent hardstanding area for metal sorting</p> <p>The site lies within the Imperial Way Industrial Estate, which comprises a mix of new and mid-century warehouses, mostly double height.</p>
<b>Planning Designations</b>	<p>Strategic Industrial Area</p> <p>Archaeological Priority Area</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. This site is achieving near its permitted capacity so it is unlikely that there is an opportunity to intensify the site in its current form.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question C8** Do you agree this site should be safeguarded for waste uses?

### C9 Pear Tree Farm, Featherbed Lane, Croydon CR0 9AA



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Site size (ha)	1.8
Type of facility	Waste Transfer Station
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	37,500
Licensed capacity (tpa)	37,500
Qualifying throughput (tpa)	0

<b>Site Description</b>	Uncovered sorting facility, skip storage area along with vehicle storage and repair Site is within the Green Belt surrounded by farmland
<b>Planning Designations</b>	Green Belt      Archaeological Priority Area
<b>Currently Safeguarded</b>	Yes - Site reference in SLWP 2011:5
<b>Opportunity to increase waste managed</b>	No. This site is within the Green Belt and has been refused permission to intensify operations on several occasions on the basis of harm to the Green Belt and character and appearance of the area. Therefore this site is not suitable for intensification.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby open spaces</li> <li>● Evaluating and preserving any archaeological remains as the site is in the archaeological priority area - Croydon Downs</li> <li>● Minimising flood risk on- and off-site</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Green Belt</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question C9** Do you agree this site should be safeguarded for waste uses?

### C10 Purley Oaks Civic Amenity Site, Brighton Road, Croydon CR8 2BG



Not to Scale

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Site size (ha)	0.2
Type of facility	Transfer
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	9,099
Licensed capacity (tpa)	12,535
Qualifying throughput (tpa)	6,684 (HCI)

**Site Description** Open local authority reuse and recycling centre. Located within a local centre with nearby residential development.

**Planning Designations** Place Specific Policy area: DM42.1 Purley District Centre  
Archaeological Priority Area

**Currently Safeguarded** Yes – Site reference in SLWP 2011: 4

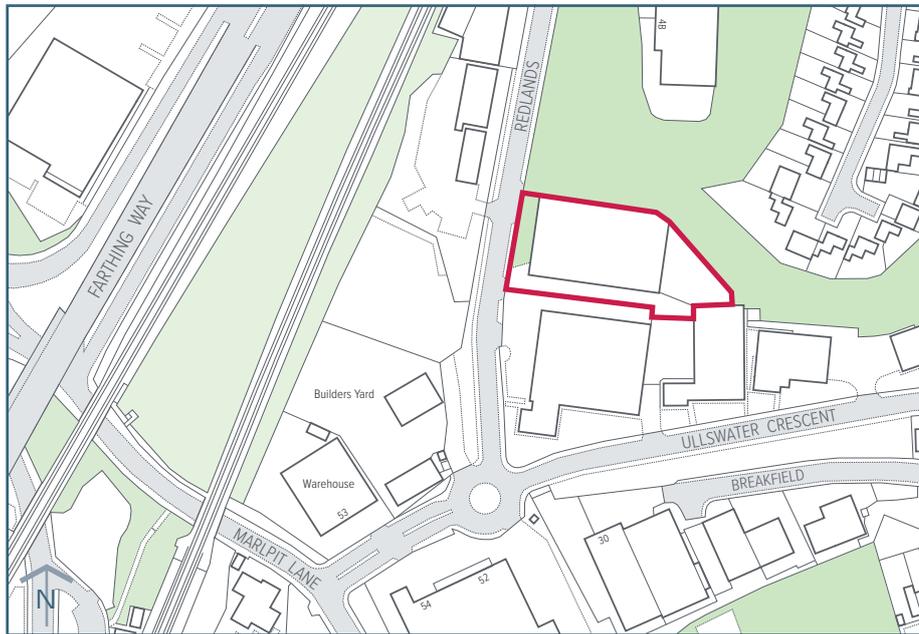
**Opportunity to increase waste managed** No. The site is adjacent to the proposed Site DM42.3 for a Gypsy and traveller site so there is no capacity to expand

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Evaluating and preserving any archaeological remains in the archaeology priority area London to Brighton Roman Road
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
- Providing appropriate soft landscaping
- Note that the Schedule 2 Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018

**Question C10** Do you agree this site should be safeguarded for waste uses?

### C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon CR5 2HT



Not to Scale

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Site size (ha)	0.3
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	Not operational
Licensed capacity (tpa)	12,782
Qualifying throughput (tpa)	0

**Site Description** Large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear

The site lies within an industrial area with similar adjacent uses. To the east, there is a residential area with a buffer of green space and trees between.

**Planning Designations** Strategic Industrial Location

**Currently Safeguarded** Yes – Site reference in SLWP 2011: A

**Opportunity to increase waste managed** Yes. The site is currently vacant waste site and so there is an opportunity to add throughput to the apportionment total

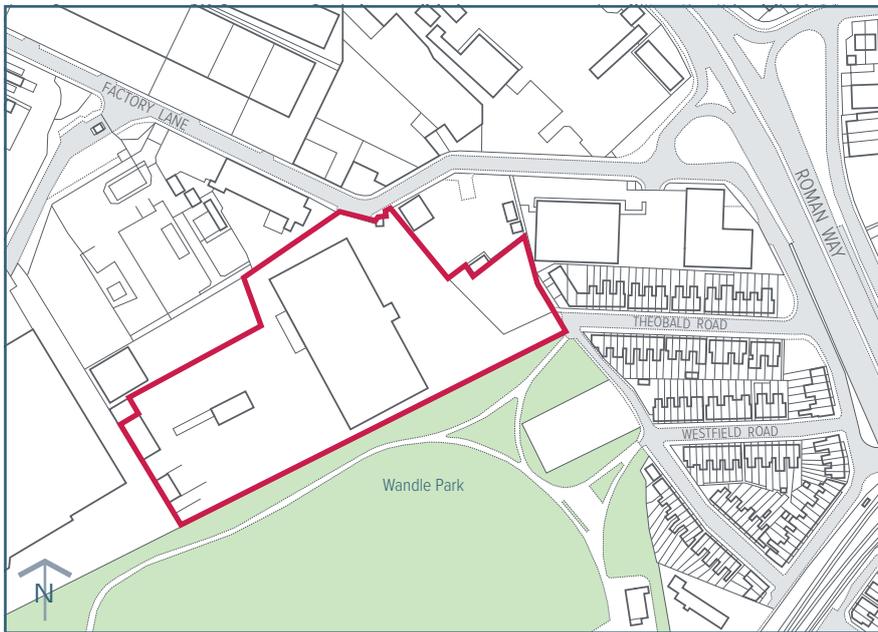
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts

**Question C11** Do you agree this site should be safeguarded for waste uses?

### C12 Stubbs Mead Depot, Factory Lane, Croydon CR0 3RL



Not to Scale

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Site size (ha)	0.06
Type of facility	Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	24,383
Licensed capacity (tpa)	Unknown
Qualifying throughput (tpa)	0

**Site Description**

Large double-height shed with associated circulation.

The site lies within an industrial area with similar adjacent uses. To the south, there is Wandle Park and to the east some residential properties are relatively nearby

**Planning Designations**

Strategic Industrial Location

**Currently Safeguarded**

Yes – Site reference in SLWP 2011: B

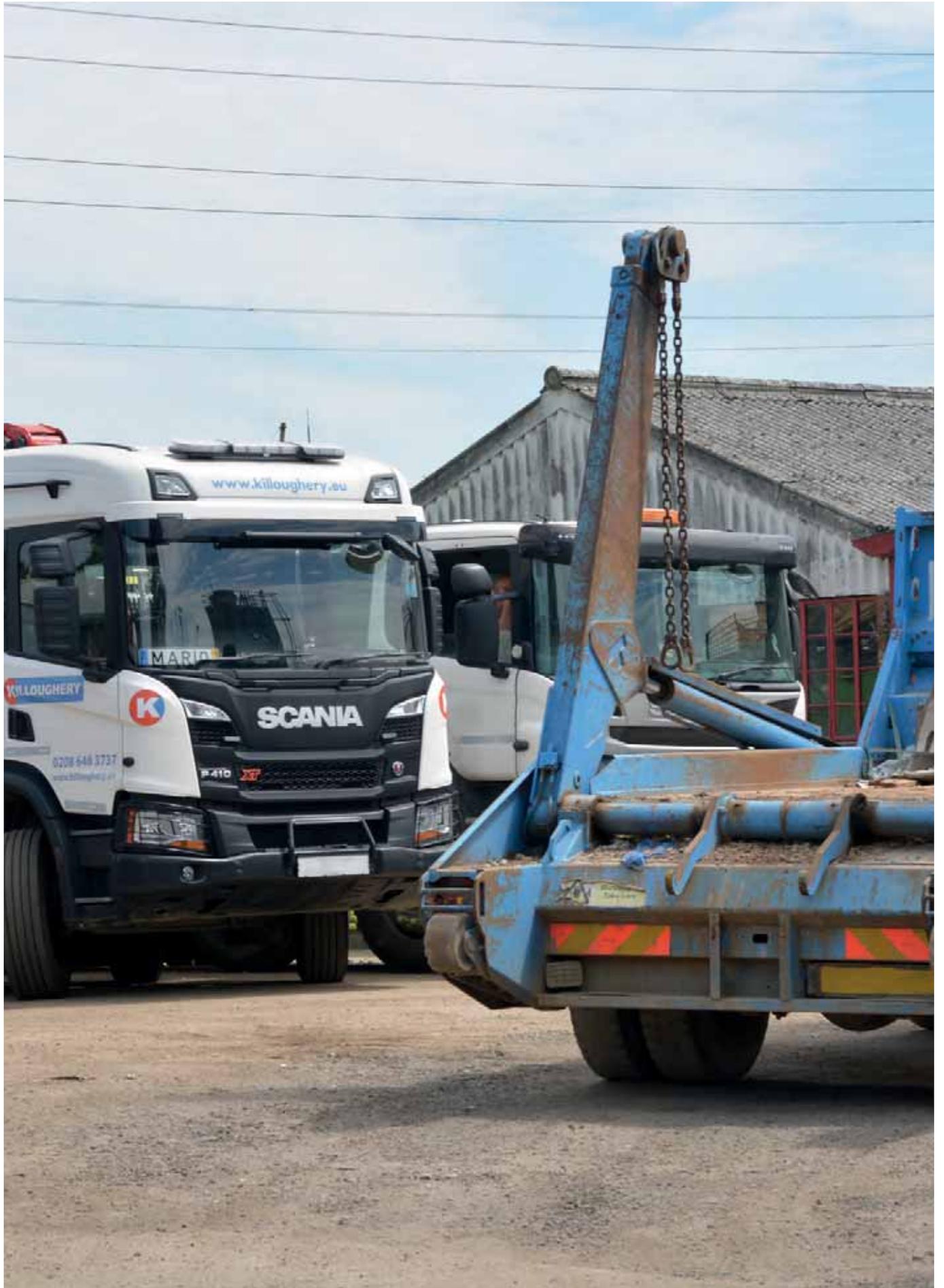
**Opportunity to increase waste managed**

Yes. The site had some throughput in the past but has not registered a return since 2015.

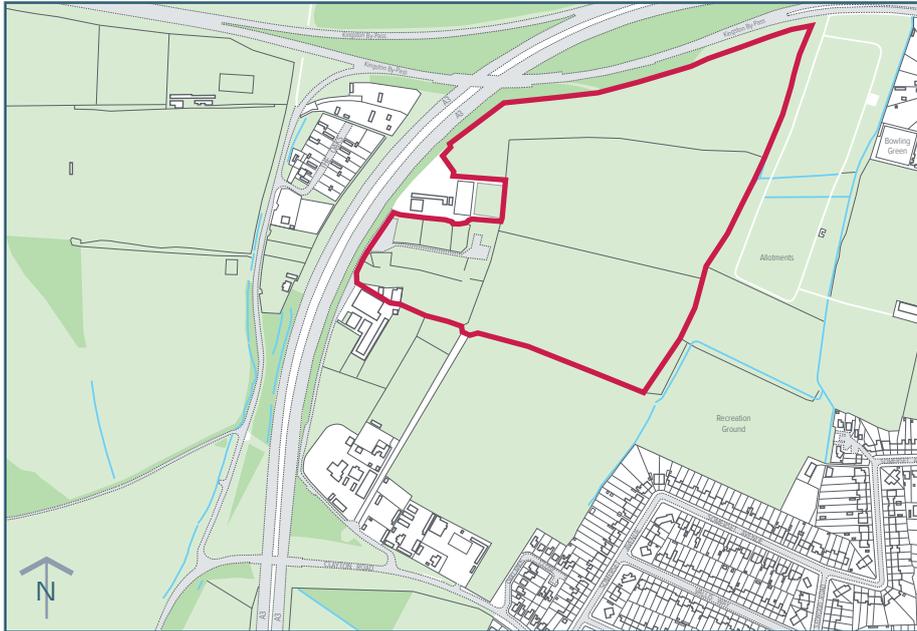
**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Wandle Park
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

**Question C12** Do you agree this site should be safeguarded for waste uses?



## K1 Chessington Equestrian Centre, Clayton Road, Kingston KT9 1NN



Not to Scale

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Site size (ha)	9.9
Type of facility	Deposit of waste to land as a recovery operation
Type of waste	Excavation,
Maximum throughput tonnes per annum (tpa)	44,285
Licensed capacity (tpa)	99,999
Qualifying throughput (tpa)	0

**Site Description** Open facility.  
 The site is located in the Green Belt. Chessington Equestrian Centre is adjacent. There are mobile homes and an industrial area to the south of the site.

**Planning Designations** Green Belt

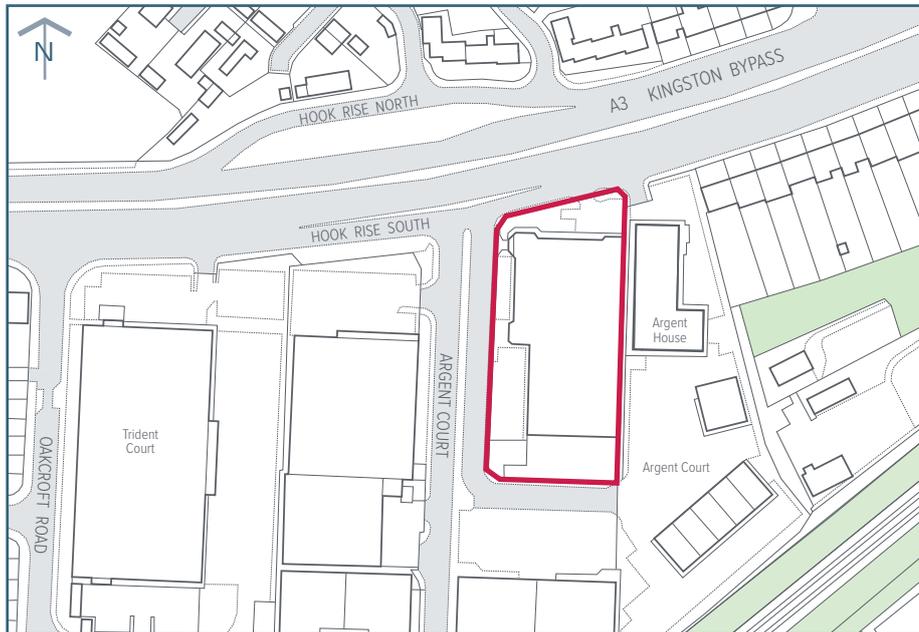
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The Chessington Equestrian Centre has a permit to accept inert excavation waste as a recovery operation. This is not a permanent waste site and therefore no opportunity to intensify uses.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Hook and Southborough Cricket Club and King Edward’s Recreation Ground
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question K1** Do you agree this site should be safeguarded for waste uses?

**K2 Genuine Solutions Group, Solutions House, Unit 1A, 223 Hook Rise South, Kingston KT6 7LD**



Not to Scale

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Site size (ha)	0.3
Type of facility	recycling and Reuse
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	1,630
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	1,630 (HCI)

**Site Description** Two-storey office block fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear  
 In an industrial area surrounded by similar large industrial sheds. Fronting onto Hook Rise South, beyond which is the Kingston bypass.

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

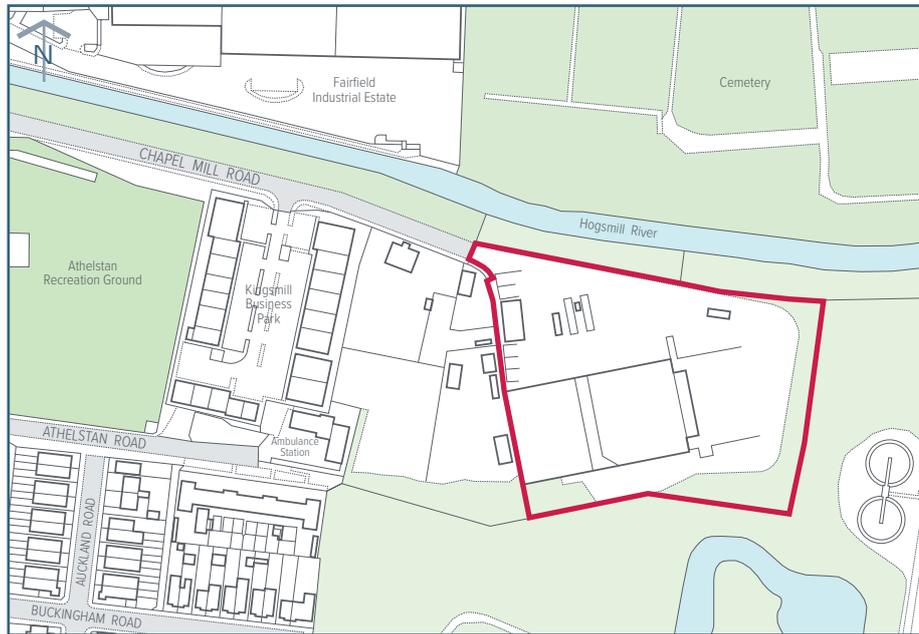
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This type of facility typically has a lower throughput per hectare, so it is unlikely that there is an opportunity to intensify operations at this site in its current form.

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Tolworth Recreation Ground, King George’s Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Providing appropriate soft landscaping

**Question K2** Do you agree this site should be safeguarded for waste uses?

### K3 Kingston Civic Amenity Site, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Not to Scale

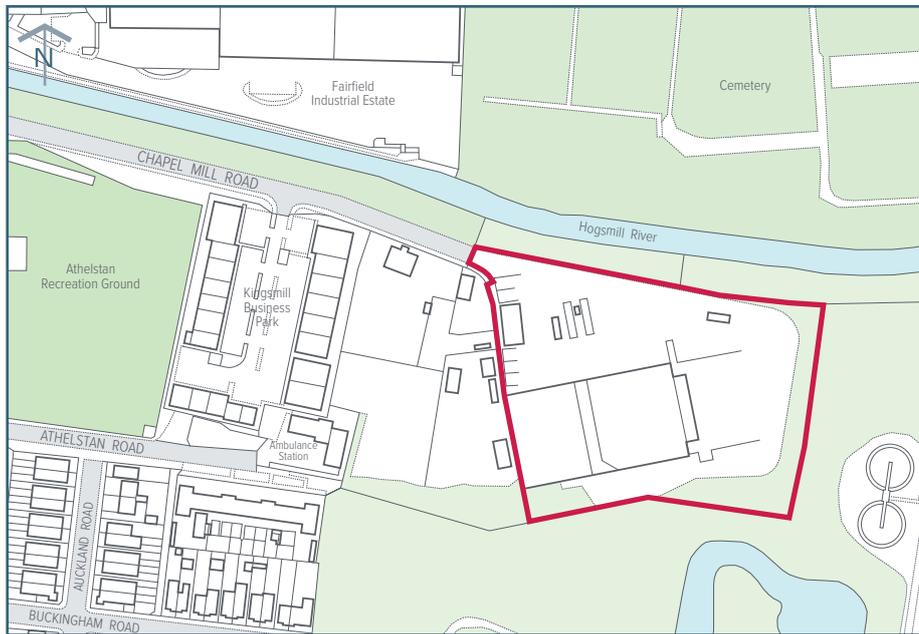
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Site size (ha)	2.0 (including K4)
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,363
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,392 (HCI)

<b>Site Description</b>	Enclosed local authority reuse and recycling centre The site lies within an industrial area which is surrounded by open space. The Kingston Waste Transfer Station is within the same site.
<b>Planning Designations</b>	Locally Significant Industrial Site Area of Archaeological Significance
<b>Currently Safeguarded</b>	Yes. Site reference in SLWP 2011: 6
<b>Opportunity to increase waste managed</b>	No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.
<b>Issues to consider if there is a further application</b>	Developers planning to intensify the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question K3** Do you agree this site should be safeguarded for waste uses?

### K4 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



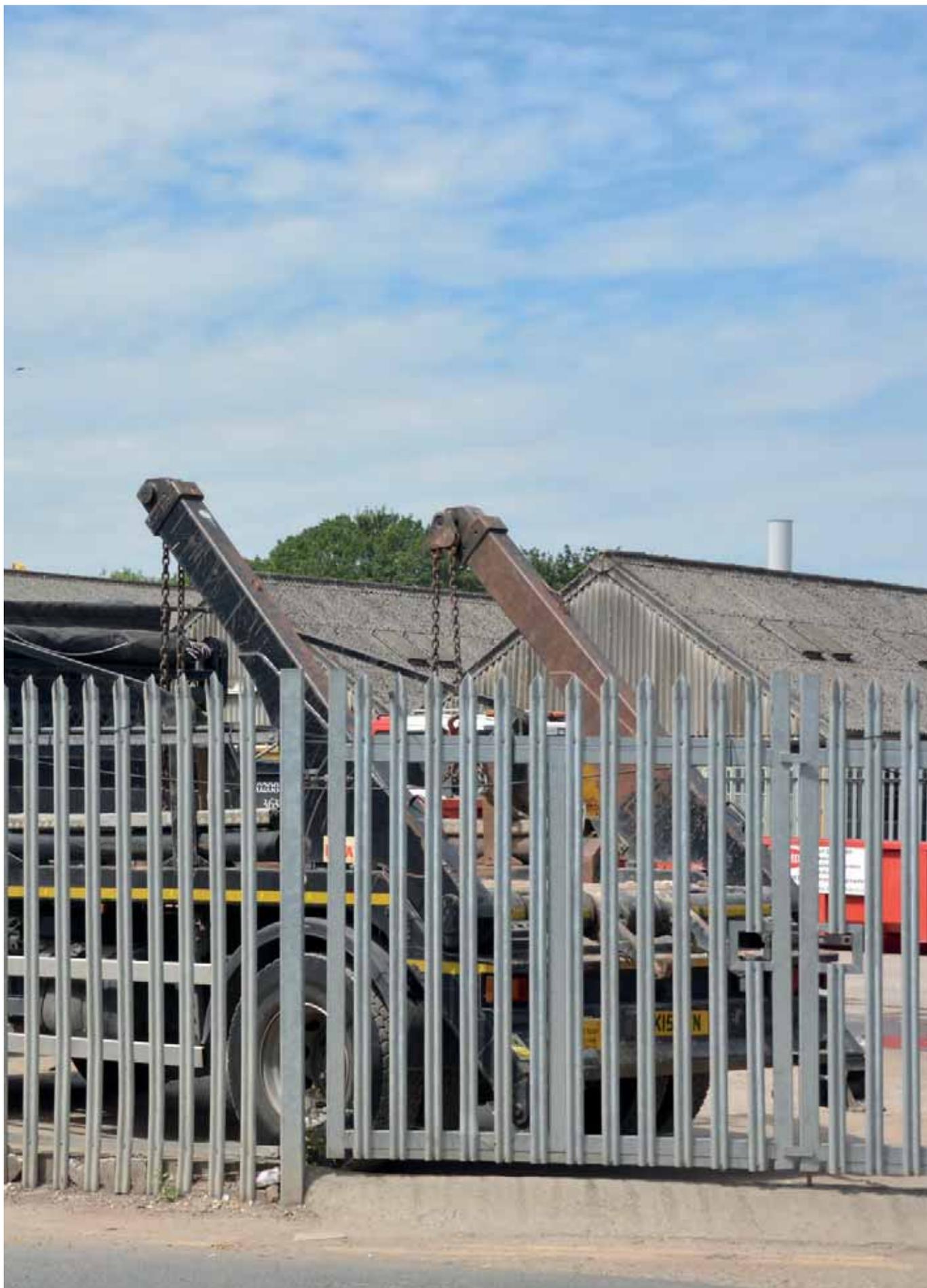
Not to Scale

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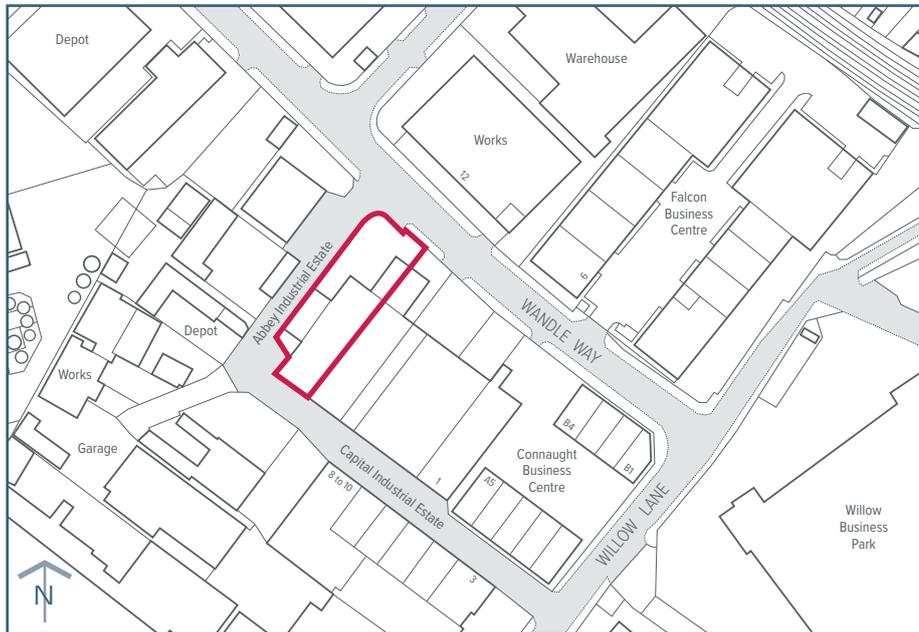
Site size (ha)	2.0 (including K3)
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	68,883
Licensed capacity (tpa)	200,500
Qualifying throughput (tpa)	19,620 (HCI)

<b>Site Description</b>	<p>Double-height enclosed shed with hardstanding for vehicles.</p> <p>The site lies within an industrial area which is surrounded by open space. The Kingston Civic Amenity Site is within the same site.</p>
<b>Planning Designations</b>	<p>Locally Significant Industrial Site      Area of Archaeological Significance</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Open Land</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question K4** Do you agree this site should be safeguarded for waste uses?



### M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.06
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	3,729
Licensed capacity (tpa)	5,000
Qualifying throughput (tpa)	0

**Site Description** Open area with skips  
 Located within an industrial area and surrounded by similar two-storey sheds. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

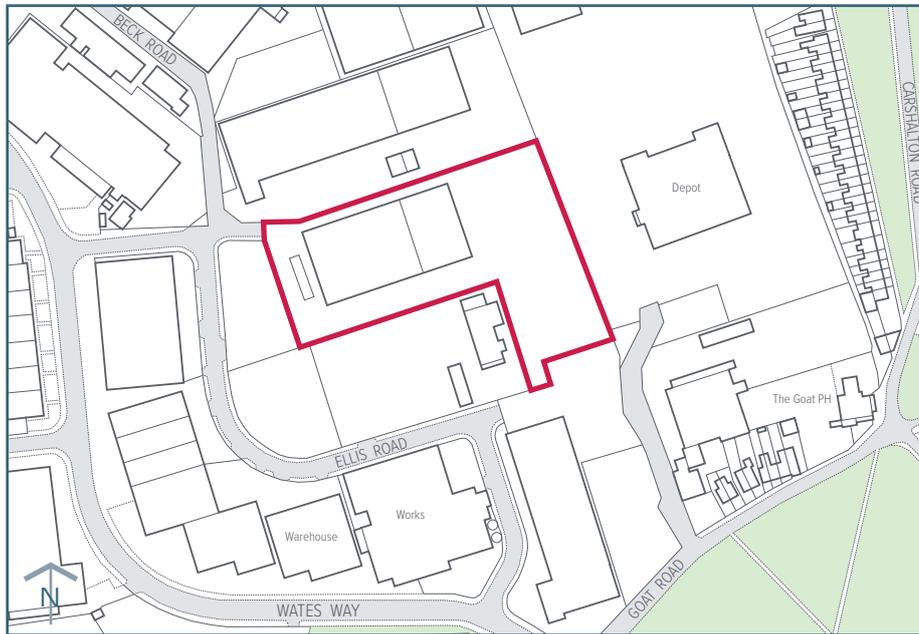
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
    - Designing the site so that operations are carried out within a fully enclosed building
    - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
    - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
    - Evaluating and preserving any archaeological remains
    - Providing appropriate soft landscaping

**Question M1** Do you agree this site should be safeguarded for waste uses?

## M2 European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX



Not to Scale

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Site size (ha)	1.0
Type of facility	Metal recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	70,100
Licensed capacity (tpa)	109,500
Qualifying throughput (tpa)	70,100 (HCI)

**Site Description** A collection of large double-height warehouses and office space with hardstanding for metal sorting, vehicles and skips

Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north west of the site

**Planning Designations** Strategic Industrial Location  
Archaeological PriorityZone

**Currently Safeguarded** Yes. Site Reference in SLWP 2011: 22 (under name of B Nebbett & Son)

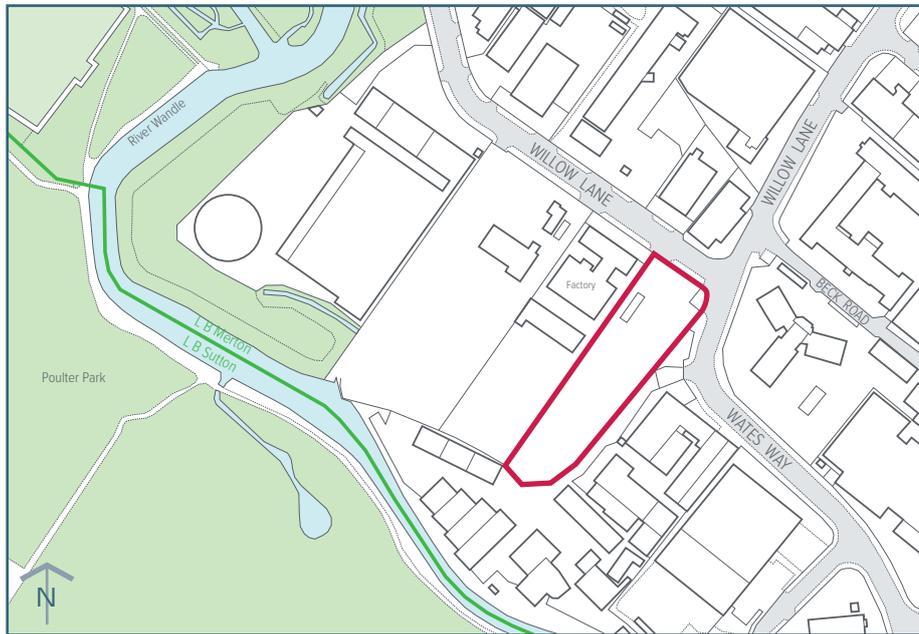
**Opportunity to increase waste managed** No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Minimising flood risk on- and off-site
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

**Question M2** Do you agree this site should be safeguarded for waste uses?

### M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.4
Type of facility	Paper sorting and baling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	5,000
Licensed capacity (tpa)	N/A
Qualifying throughput (tpa)	5,000 (HCI)

**Site Description** Hardstanding for material sorting, vehicles and skips. Two-storey portakabin office  
 Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. There is a 2010 planning permission for metals recycling on this site with a throughput of 1,500 tonnes per week, which equates to 78,000 tonnes per annum. Therefore, there could be an opportunity to intensify throughput on the site with some intervention.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M3** Do you agree this site should be safeguarded for waste uses?

**M4 Garth Road Civic Amenity Site, 66-69 Amenity Way, Garth Road, Merton SM4 4AX**



Not to Scale

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Site size (ha)	0.7 (including M5)
Type of facility	Household Waste Amenity Site
Type of waste	Local Authority, collected waste
Maximum throughput tonnes per annum (tpa)	14,594
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,866 (HCI)

**Site Description**

Open local authority reuse and recycling centre

The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

**Planning Designations**

Locally Significant Industrial Location

**Currently Safeguarded**

Yes. Site Reference in SLWP 2011: 9

**Opportunity to increase waste managed**

No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Providing appropriate soft landscaping

**Question M4** Do you agree this site should be safeguarded for waste uses?

### M5 Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



Not to Scale

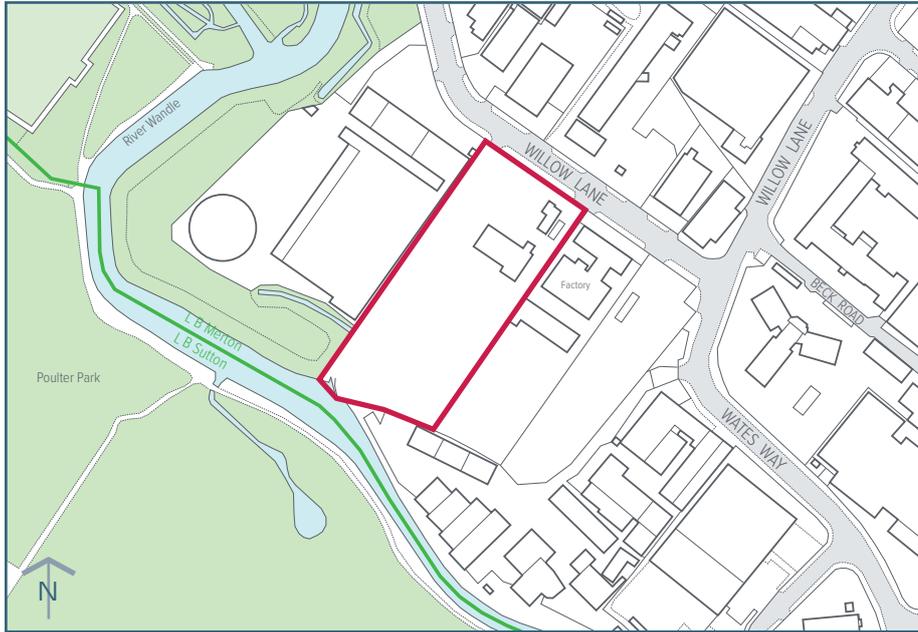
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Site size (ha)	0.45
Type of facility	Transfer Station
Type of waste	Local Authority, Collected Waste and Hazardous
Maximum throughput tonnes per annum (tpa)	18,839
Licensed capacity (tpa)	22,281
Qualifying throughput (tpa)	15,704 (HCI)

<b>Site Description</b>	<p>Transfer station</p> <p>The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units</p>
<b>Planning Designations</b>	Locally Significant Industrial Location
<b>Currently Safeguarded</b>	Yes. Site Reference in SLWP 2011: 9
<b>Opportunity to increase waste managed</b>	No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question M5** Do you agree this site should be safeguarded for waste uses?

## M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste accepted	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	71,253
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

### Site Description

A large site comprising a double-height industrial shed with hardstanding for vehicles, skips and waste.

Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

### Planning Designations

Strategic Industrial Location      Archaeological Priority Zone

### Currently Safeguarded

No

### Opportunity to increase waste managed

No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M6** Do you agree this site should be safeguarded for waste uses?

### M7 LMD Waste Management, Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.06
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	24,999
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	20,774 (C&D)

**Site Description**

Mainly open hardstanding for Construction and Demolition waste sorting. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

No. It is unlikely that there is an opportunity to intensify operations

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M7** Do you agree this site should be safeguarded for waste uses?

### M8 LMD Waste Management, 32 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	38,738
Licensed capacity (tpa)	50,000
Qualifying throughput (tpa)	33,845 (C&D)

**Site Description**

Double-height shed with attached single-storey offices

Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location opposite the site

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

No. The throughput ratio is above average for this type of facility

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M8** Do you agree this site should be safeguarded for waste uses?

### M9 Maguire Skips, Storage Yard, Wandle Way, Merton CR4 4NB



Not to Scale

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Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	58,150
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

**Site Description** Mainly open hardstanding for skips and sorting. Double-height covered area. Located within the Willow Lane industrial estate and surrounded by similar industrial properties, however, there are residential properties approximately 20 metres to the north of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

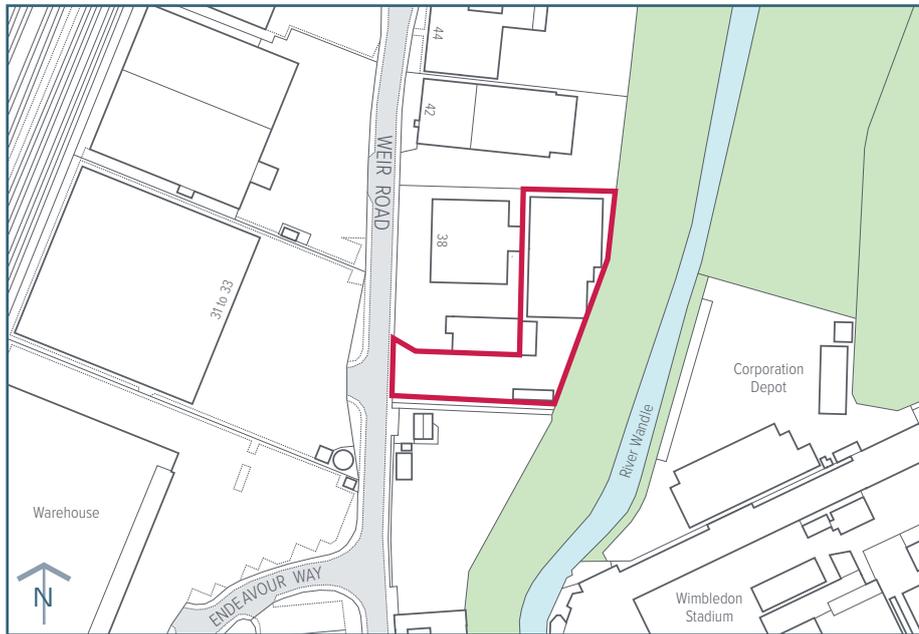
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The plot throughput ratio is above average for this type of facility so there are unlikely to be opportunities to intensify the throughput.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M9** Do you agree this site should be safeguarded for waste uses?

### M10 Maguire Skips, 36 Weir Court, Merton SW19 8UG



Not to Scale

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Site size (ha)	0.3
Type of facility	Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	53,313
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	42,856 (C&D)

**Site Description**

Enclosed double-height shed with outside hardstanding space

Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority one

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

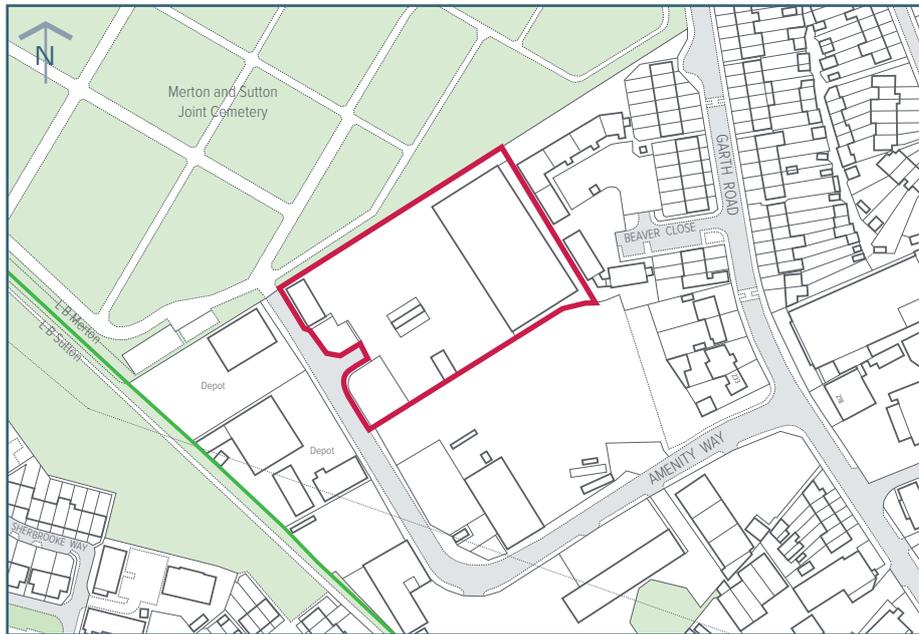
No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M10** Do you agree this site should be safeguarded for waste uses?

### M11 Morden Transfer Station, Amenity Way, Merton SM4 4AX



Not to Scale

© Crown copyright Licence No. 100019285 (2019)

Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	39,950
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

**Site Description** Double-height industrial shed with hardstanding

The site lies within an industrial location surrounded by similar activities, and flats and a cemetery respectively along its north-eastern and north-western boundaries

**Planning Designations** Locally Significant Industrial Location

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 25 (as Sloane Demolition)

**Opportunity to increase waste managed** No. There are no known plans to intensify operations at the facility

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the adjacent cemetery
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M11** Do you agree this site should be safeguarded for waste uses?

### M12 NJB Recycling, 77 Weir Road, Merton SW19 8UG



Not to Scale

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Site size (ha)	0.4
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	48,687
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	18,030 (C&D)

**Site Description** Enclosed triple-height shed with outside hardstanding space for vehicles  
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. The site is adjacent to a Gypsy and Traveller site in Wandsworth

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

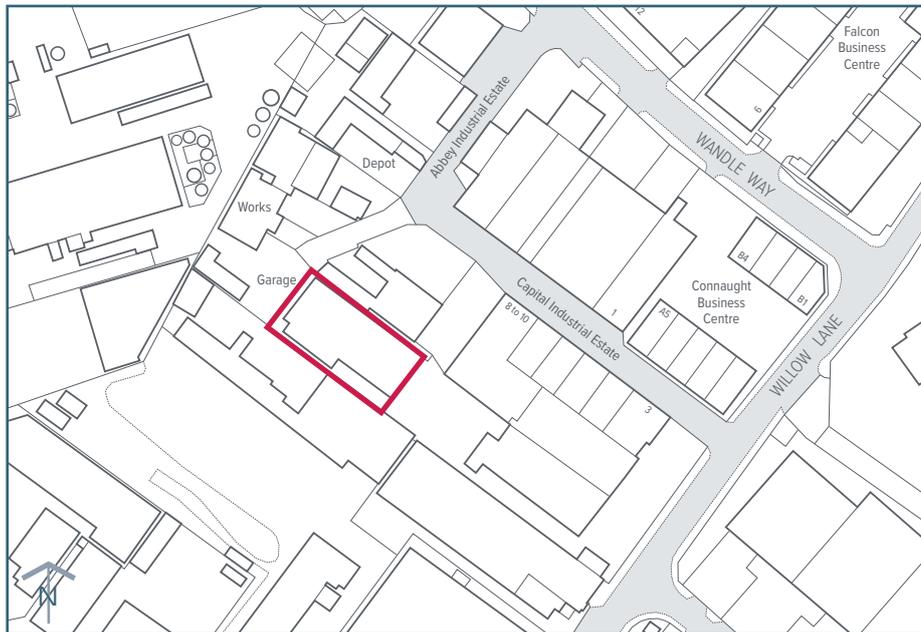
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M12** Do you agree this site should be safeguarded for waste uses?

### M13 One Waste Clearance, Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA



Not to Scale

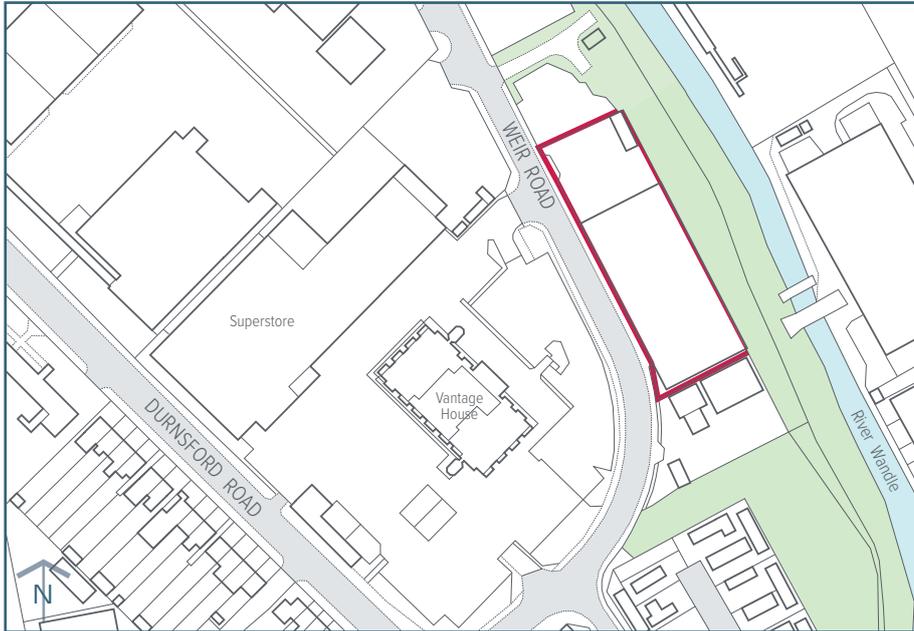
© Crown copyright Licence No. 100019285 (2019)

Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	20,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	13,453 (HCI) 4,547 (C&D)

<b>Site Description</b>	The facility is a fully enclosed industrial unit Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site
<b>Planning Designations</b>	Strategic Industrial Location Archaeological Priority Zone
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. The throughput per hectare is based on the few weeks the facility has been operating, which is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form
<b>Issues to consider if there is a further application</b>	Developers planning to intensify the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question M13** Do you agree this site should be safeguarded for waste uses?

**M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG**



Site size (ha)	0.43
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	71,595
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	30,131 (C&D)

Not to Scale

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**Site Description** Enclosed triple-height shed with outside hardstanding for vehicles  
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

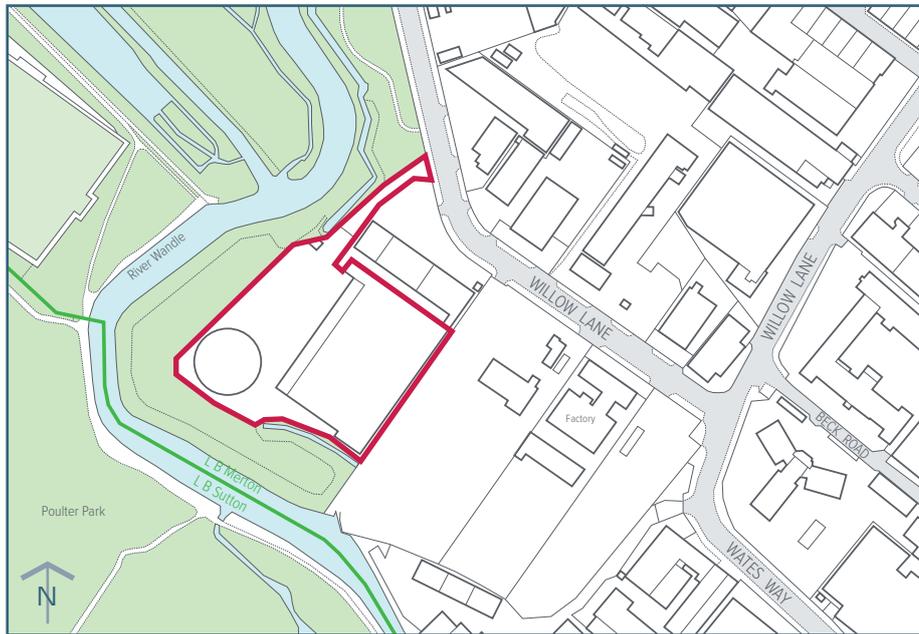
**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 27 (known as the SITA Transfer Station)

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
    - Designing the site so that operations are carried out within a fully enclosed building
    - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
    - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
    - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
    - Evaluating and preserving any archaeological remains
    - Not harming biodiversity in the vicinity
    - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
    - Designing a facility that does not impact on the openness of Metropolitan Open Land
    - Providing appropriate soft landscaping

**Question M14** Do you agree this site should be safeguarded for waste uses?

### M15 Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.9 (includes M16)
Type of facility	Anaerobic Digestion
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	36,341
Licensed capacity (tpa)	99,999
Qualifying throughput (tpa)	46,341 (HCI)

#### Site Description

The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel

The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

#### Planning Designations

Strategic Industrial Location  
Archaeological Priority Zone

#### Currently Safeguarded

Yes. Site Reference in 2011 SLWP: V (known as Vortal)

#### Opportunity to increase waste managed

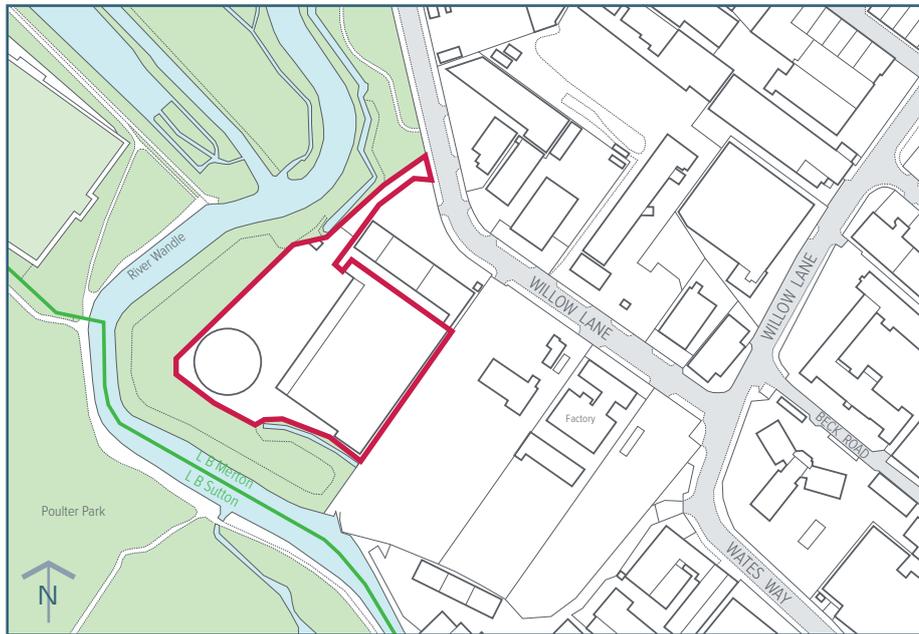
No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

#### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M15** Do you agree this site should be safeguarded for waste uses?

## M16 Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.9 (includes M15)
Type of facility	Composting
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	51,715
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	51,715 (HCI)

**Site Description** The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel

The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: V (known as Vortal)

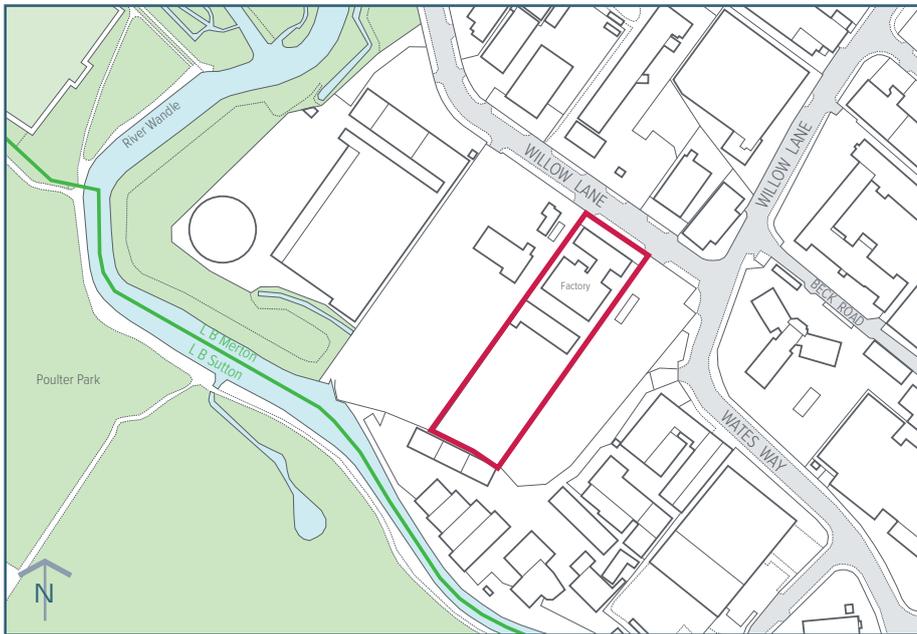
**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Minimising flood risk on- and off-site
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Providing appropriate soft landscaping

**Question M16** Do you agree this site should be safeguarded for waste uses?

**M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA**



Site size (ha)	0.5
Type of facility	Treatment of waste to produce soil
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	804
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** A large site comprising a double-height industrial shed with hardstanding for vehicles, hardstanding for skips and construction, demolition and excavation waste

The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties. The River Wandle lies to the west of the site. Connect House, which was converted to residential use through permitted development lies to the north-east of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

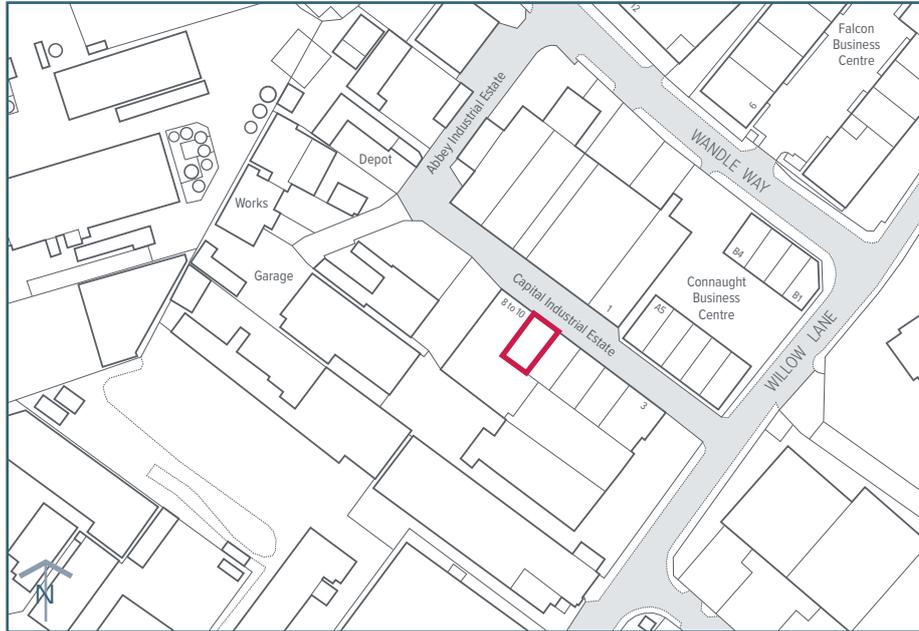
**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. The site appears to be operating well below its potential as a waste management site and there is the opportunity to intensify operations and increase throughput on the site

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M17** Do you agree this site should be safeguarded for waste uses?

**M18 Wandle Waste Management, Unit 7, Abbey industrial Estate, Willow Lane, Merton CR4 4NA**



Not to Scale

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Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Hazardous,
Maximum throughput tonnes per annum (tpa)	141
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	0

**Site Description**

A double-height industrial shed

The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development lies to the south of the site

**Planning Designations**

Strategic Industrial Location  
Archaeological PriorityZone

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

No. The throughput on this site is very small and it is unlikely that there is an opportunity to intensify operations at the site

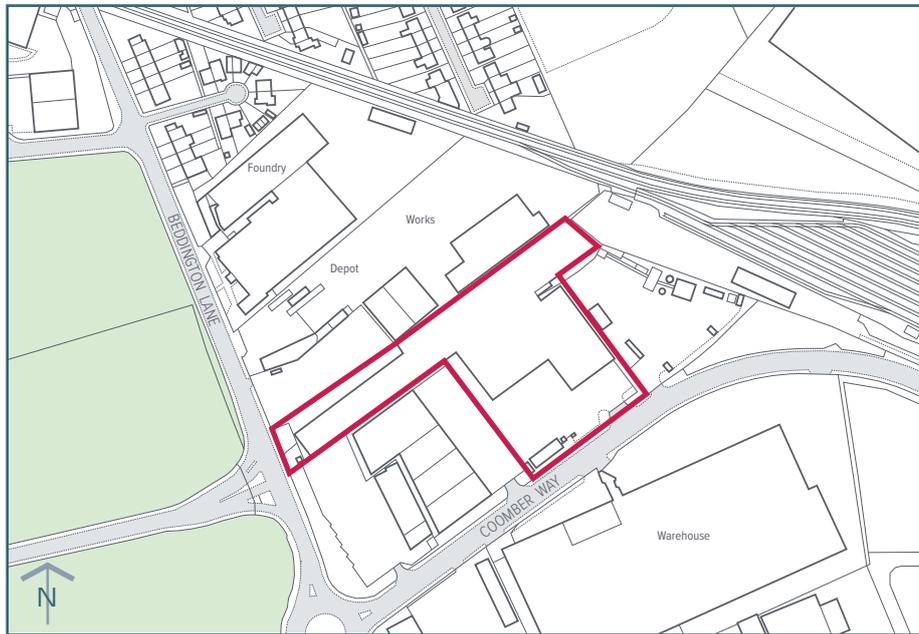
**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M18** Do you agree this site should be safeguarded for waste uses?



### S1 777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TQ



Not to Scale

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Site size (ha)	1.0
Type of facility	Material Recycling and Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	56,912
Licensed capacity (tpa)	372,600
Qualifying throughput (tpa)	20,625 (HCI) 32,972 (C&D)

**Site Description**

The site comprises large double-height and triple-height modern industrial sheds with hardstanding for skip storage and parking  
 The site is part of a large strategic industrial location, backing on to tram lines to the rear.

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 21

**Opportunity to increase waste managed** Yes. The site has a current maximum throughput of just under 57,000 tonnes but the operator states they could manage more waste

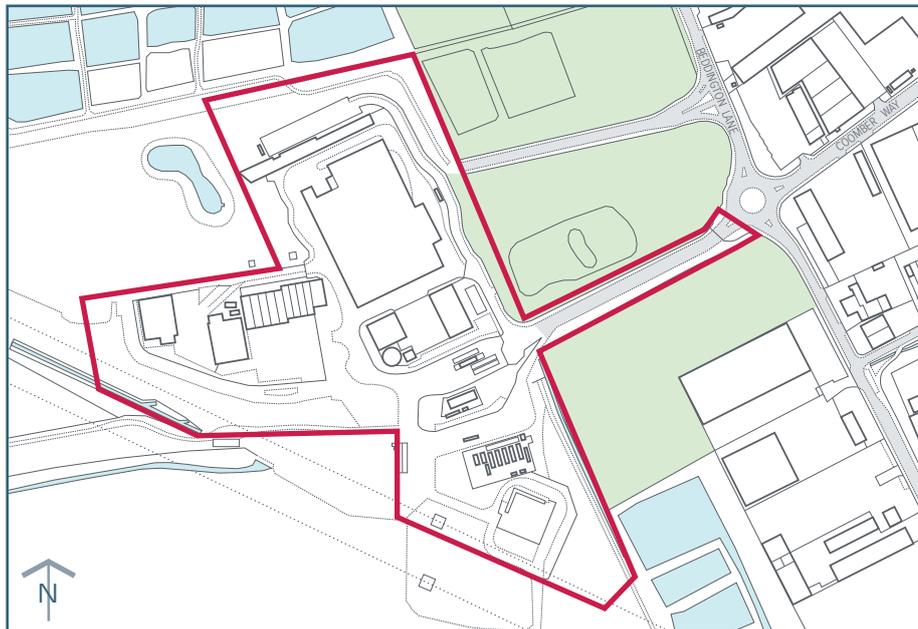
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

**Question S1** Do you agree this site should be safeguarded for waste uses?

## S2 Beddington Farmlands Energy Recovery Facility, Beddington Waste Management Facility, 105 Beddington Lane, Sutton CR0 4TD



Not to Scale

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Site size (ha)	7.44
Type of facility	Energy from waste
Type of waste accepted	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	275,000
Licensed capacity (tpa)	302,500
Qualifying throughput (tpa)	275,000 (HCI)

### Site Description

An energy recovery facility. The facility lies within the Wandle Valley Regional Park and Metropolitan Open Land and is adjacent to the Viridor Recycling Facility and the Beddington Farmlands Landfill site. The land immediately to the east has permission for an extension to the Beddington Strategic Industrial Location

### Planning Designations

Metropolitan Open Land                      Metropolitan Green Chain  
 Site of Importance for Nature Conservation  
 Land safeguarded for the Wandle Valley Regional Park                      Archaeological Priority Zone

### Currently Safeguarded

No

### Opportunity to increase waste managed

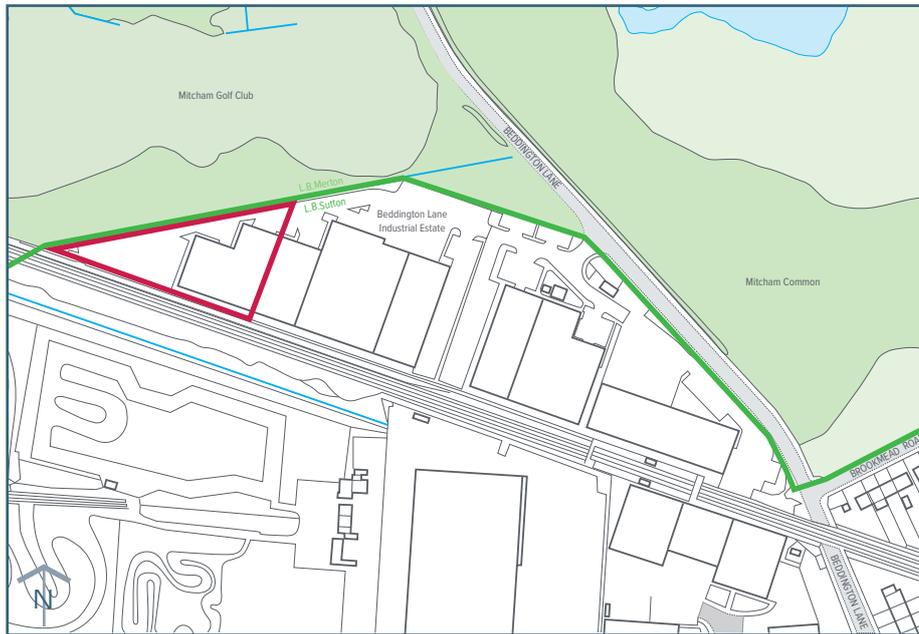
No. This is a new facility and therefore there are no opportunities to upgrade or intensify operations at the current time

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question S2** Do you agree this site should be safeguarded for waste uses?

### S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TD



Not to Scale

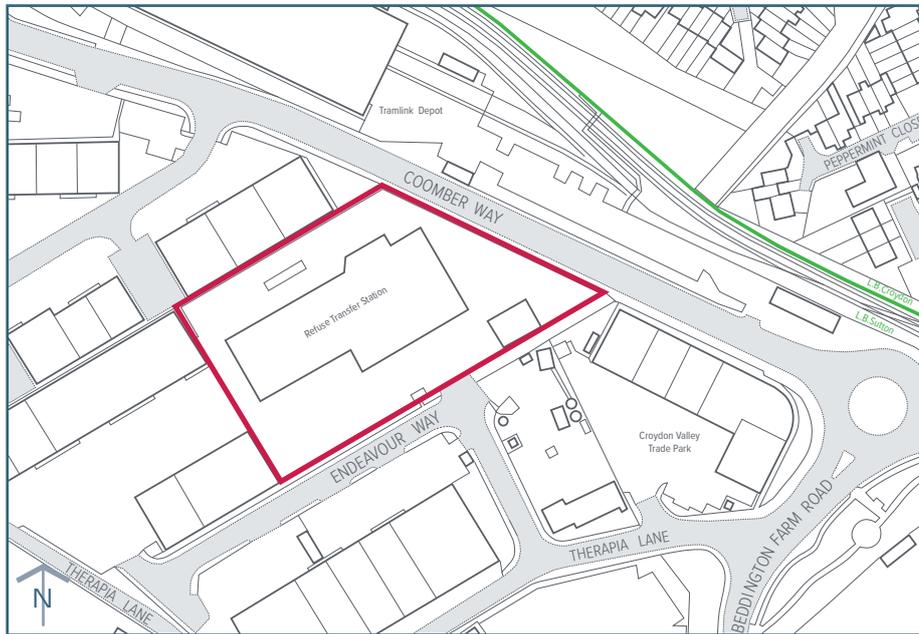
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Site size (ha)	0.2
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	9,601
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

<b>Site Description</b>	<p>Modern, double-height industrial unit</p> <p>The Beddington Lane industrial estate lies at the northern end of the Purley Way and Beddington Strategic Industrial Location. It largely comprises large, double-height industrial sheds with some ancillary office space</p>
<b>Planning Designations</b>	<p>Strategic Industrial Location</p> <p>Archaeological Priority Area</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	Yes. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the future Wandle Valley Regional Park</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Open Land</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question S3** Do you agree this site should be safeguarded for waste uses?

### S4 Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR



Not to Scale

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Site size (ha)	0.7
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	27,799
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	21,113 (HCI)

#### Site Description

A double- and triple-height enclosed sheds with hardstanding for vehicles  
 The site lies within a large industrial estate (Beddington Strategic Industrial Location) surrounded by similar industrial properties

#### Planning Designations

Strategic Industrial Location  
 Archaeological Priority Area

#### Currently Safeguarded

Yes. Site Reference in 2011 SLWP: 98

#### Opportunity to increase waste managed

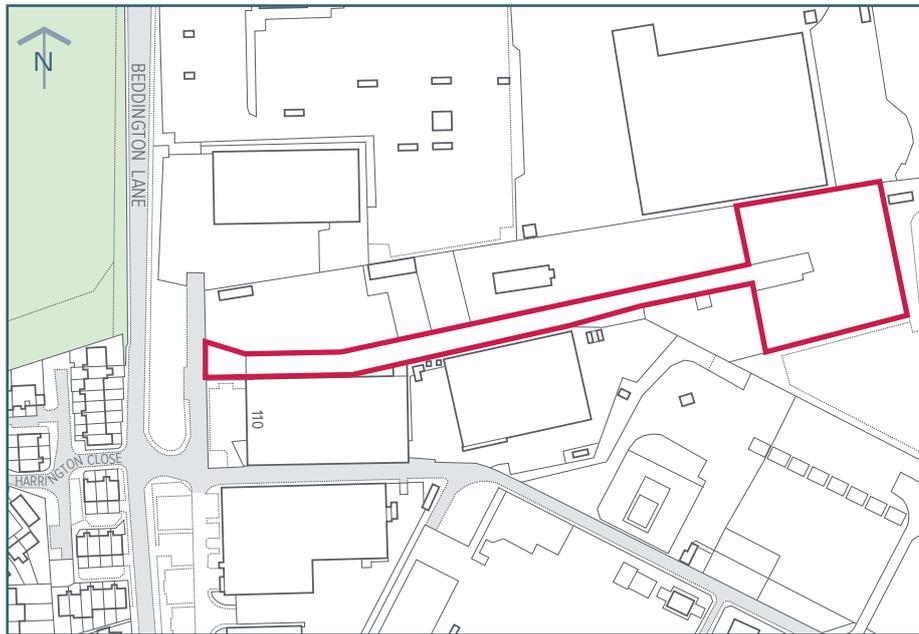
Yes. This site seems to be operating below the average throughput for this type of facility

#### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S4** Do you agree this site should be safeguarded for waste uses?

### S5 Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton CR0 4YZ



Not to Scale

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Site size (ha)	0.6
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	8,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	5,381 (HCI) 1,819 (C&D)

**Site Description**

Site Description An enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles

The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

Yes. This is a new facility which has only been operating for a short time. The operational throughput capacity of 8,000tpa has been estimated on the first quarterly return by the company. However, the planning application states that up to 50,000tpa could be managed on site. The estimated throughput is lower than average for this type of facility

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S5** Do you agree this site should be safeguarded for waste uses?

## S6 Hydro Cleansing, Hill House, Beddington Farm Road, Sutton CR0 4XB



Not to Scale

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Site size (ha)	0.2
Type of facility	Physical Treatment
Type of waste	Wastewater and Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	13,912
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	0

### Site Description

Fronted by two-storey, 1960s office block with facility to the rear

The site is located on Beddington Farm Road in the Beddington Strategic Industrial Location. It is adjacent to the Surrey Jaguar Centre and the Royal Mail Centre

### Planning Designations

Strategic Industrial Location  
Archaeological Priority Area

### Currently Safeguarded

No

### Opportunity to increase waste managed

No. The throughput per hectare is typical for this type of facility so it is unlikely that it will be able to intensify operations in its current form

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S6** Do you agree this site should be safeguarded for waste uses?

## S7 Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton SM3 9QH



Not to Scale

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Site size (ha)	0.4
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,799
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	8,640 (HCI)

### Site Description

Open local authority reuse and recycling centre

The site is located in the north-west of the Kimpton Strategic Industrial Location. The site is opposite the Kimpton Linear Park, which is designated as a Metropolitan Green Chain, Metropolitan Open Land and Public Open Space

### Planning Designations

Strategic Industrial Location

### Currently Safeguarded

Yes. Site Reference in 2011 SLWP: 3

### Opportunity to increase waste managed

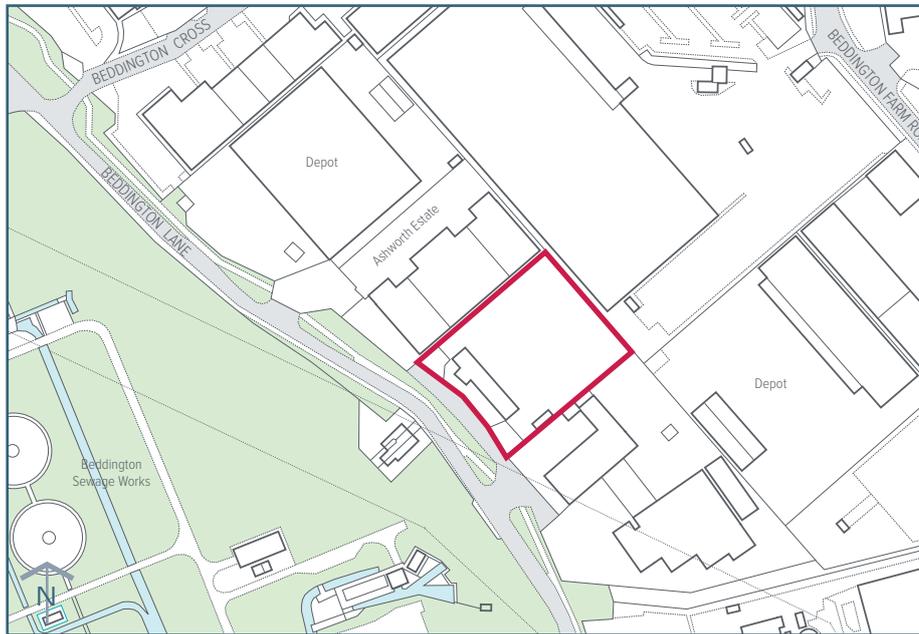
No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Kimpton Linear Park
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question S7** Do you agree this site should be safeguarded for waste uses?

### S8 King Concrete, 124 Beddington Lane, Sutton CR0 4YZ



Site size (ha)	0.4
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	1,060
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** Open site for concrete production and aggregates recovery  
 The site is part of the Beddington Strategic Industrial Location and is surrounded by similar uses

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

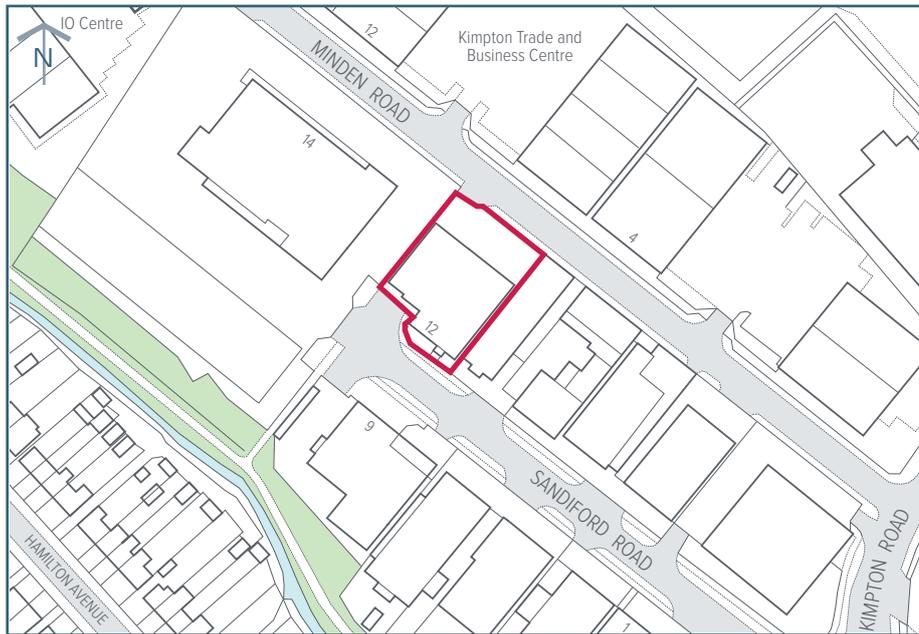
**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. Although not all of the site is a waste recycling facility, it is managing well under the average throughput for this type of facility. The planning application states that the facility will recycle 20,000tpa of Construction, Demolition and Excavation waste on site

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
    - Designing the site so that operations are carried out within a fully enclosed building
    - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
    - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
    - Evaluating and preserving any archaeological remains
    - Providing appropriate soft landscaping

**Question S8** Do you agree this site should be safeguarded for waste uses?

### S9 Premier Skip Hire, Unit 12, Sandiford Road, Sutton SM3 9RD



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Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	12,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	8,072

**Site Description** Two-storey office and warehouse building with hardstanding for skip storage

The site is located within the Kimpton Strategic Industrial Location and the closest residential properties are 75-100m south and west of the site on Hamilton Avenue

**Planning Designations** Strategic Industrial Location

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Providing appropriate soft landscaping

**Question S9** Do you agree this site should be safeguarded for waste uses?

### S10 Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR



Site size (ha)	0.3
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	15,224
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	5,310 (HCI) 5,506 (C&D)

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#### Site Description

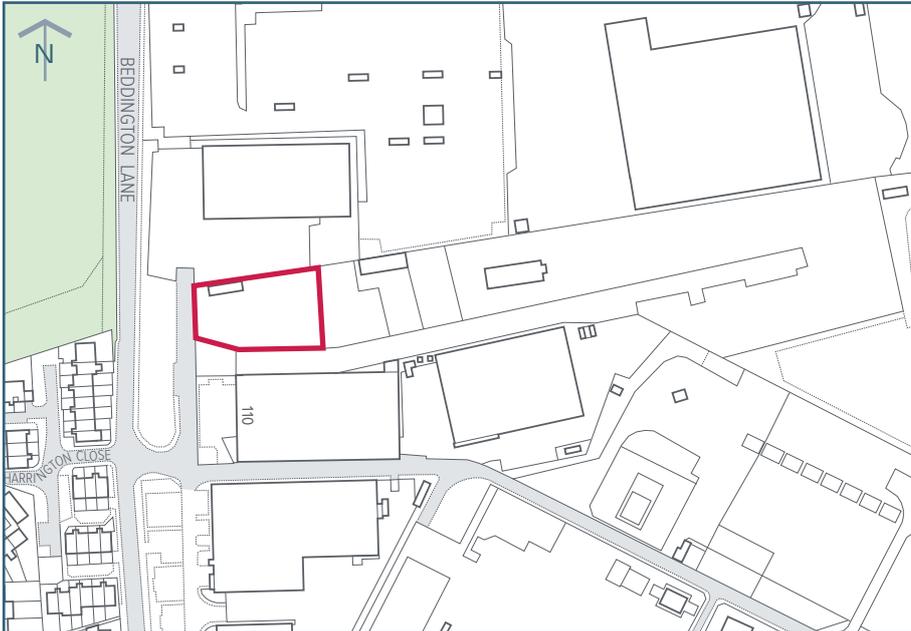
Double-height enclosed sheds with hardstanding for skips

The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

Planning Designations	Strategic Industrial Location Archaeological Priority Area
Currently Safeguarded	No
Opportunity to increase waste managed	No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form
Issues to consider if there is a further application	Developers planning to intensify the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question S10** Do you agree this site should be safeguarded for waste uses?

## S11 TGM Environmental, 112 Beddington Lane, Sutton CR0 4TD



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	15,000
Qualifying throughput (tpa)	15,000 (HCI)

### Site Description

The site is currently being used for skip and vehicle storage by Raven Recycling. However the site has planning permission for waste paper and cardboard recovery by TGM Environmental with a throughput of 15,000 tonnes per annum

The site occupies the land to the front of 112 Beddington Lane. The site lies within the Beddington Strategic Industrial Location. And similar uses surround the site.

### Planning Designations

Strategic Industrial Location  
Archaeological Priority Area

### Currently Safeguarded

No

### Opportunity to increase waste managed

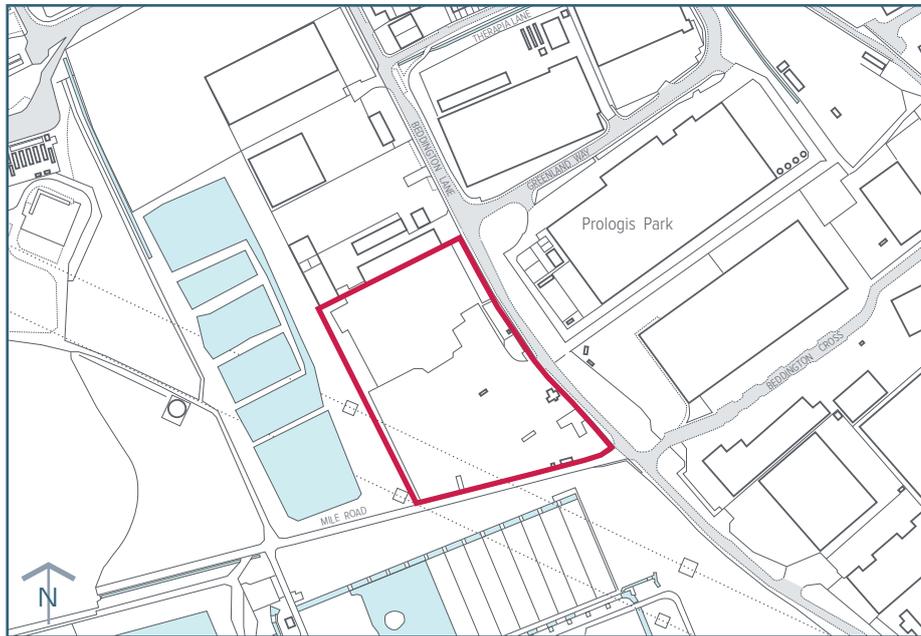
No. The operation has yet to relocate from 156 Beddington Lane. However this site offers additional space to enable the operator to undertake baling on site which did not take place on the previous site. The throughput is average for the size of the site and so it is unlikely that the facility can be intensified in its current form.

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S11** Do you agree this site should be safeguarded for waste uses?

## S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CRO 4TH



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Site size (ha)	2.8
Type of facility	Treatment with Transfer Station
Type of waste accepted	Household, Commercial and Industrial (HCI), Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	350,000
Qualifying throughput (tpa)	305,000 (HCI and C&D)

**Site Description** The site is currently vacant but the new planning permission proposal is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring. The site occupies the land to the west of Beddington Lane. It is surrounded by the proposed Wandle Valley Regional Park, Beddington Lane and industrial units to the north.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 17

**Opportunity to increase waste managed** No. The site has only recently been granted planning permission so no increase in the waste managed is likely to take place.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land

**Question S12** Do you agree this site should be safeguarded for waste uses?



## Appendix 1 Sites Counting Towards the Apportionment and C&D Target

Ref	Name	Household/C&I	C&D	Potential for Intensification
<b>Croydon Capacity</b>				
C1	Able Waste Services	0	43,268	
C2	Croydon Car Spares	241	0	
C3	Curley Skip Hire	0	0	
C4	Days Aggregates Purley Depot	0	0	
C5	Factory Lane Waste Transfer Station	9,623	5,206	Yes
C6	Fishers Farm Reuse and Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Materials	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Civic Amenity Site	6,684	0	
C11	Safety Kleen	0	0	Yes
C11	Safety Kleen	0	0	Yes
C12	Stubbs Mead Depot	0	0	Yes
CEX	Exempt Sites	7,580	0	
Croydon Total		<b>32,883</b>	<b>48,474</b>	
<b>Kingston Capacity</b>				
K1	Chessington Equestrian Centre	0	0	
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Civic Amenity Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
Kingston Total		<b>35,642</b>	<b>0</b>	
<b>Merton Capacity</b>				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M4	Garth Road Civic Amenity Site	9,866	0	
M5	Garth Road Transfer Station	15,704	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management (Willow Lane)	0	33,845	
M9	Maguire Skips (Wandle Way)	0	0	
M10	Maguire Skips (Weir Court)	0	42,856	
M11	Morden Transfer Station	0	0	
M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	

Ref	Name	Household/C&I	C&D	Potential for Intensification
<b>Merton Capacity</b>				
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	Yes
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites (including M3: Deadman Confidential)	6,000	0	Yes
Merton Total		<b>213,179</b>	<b>150,183</b>	
<b>Sutton Capacity</b>				
S1	777 Recycling Centre	20,625	32,972	Yes
S2	Beddington Farmlands Energy Recovery Facility	275,000	0	
S3	Cannon Hygiene	0	0	Yes
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Civic Amenity Site	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Country Waste Skip Hire	305,000	0	
SEX	Exempt Sites	500	0	
Sutton Total		<b>664,641</b>	<b>43,025</b>	
<b>South London Capacity</b>				
Croydon		32,883	48,474	
Kingston		35,642	0	
Merton		213,179	150,183	
Sutton		664,641	43,025	
South London Total		<b>946,345</b>	<b>241,682</b>	
<b>South London Capacity Gap</b>				
South London Capacity		946,345	241,682	
South London Targets		929,750	414,380	
Capacity Gap		<b>+16,565</b>	<b>-172,698</b>	

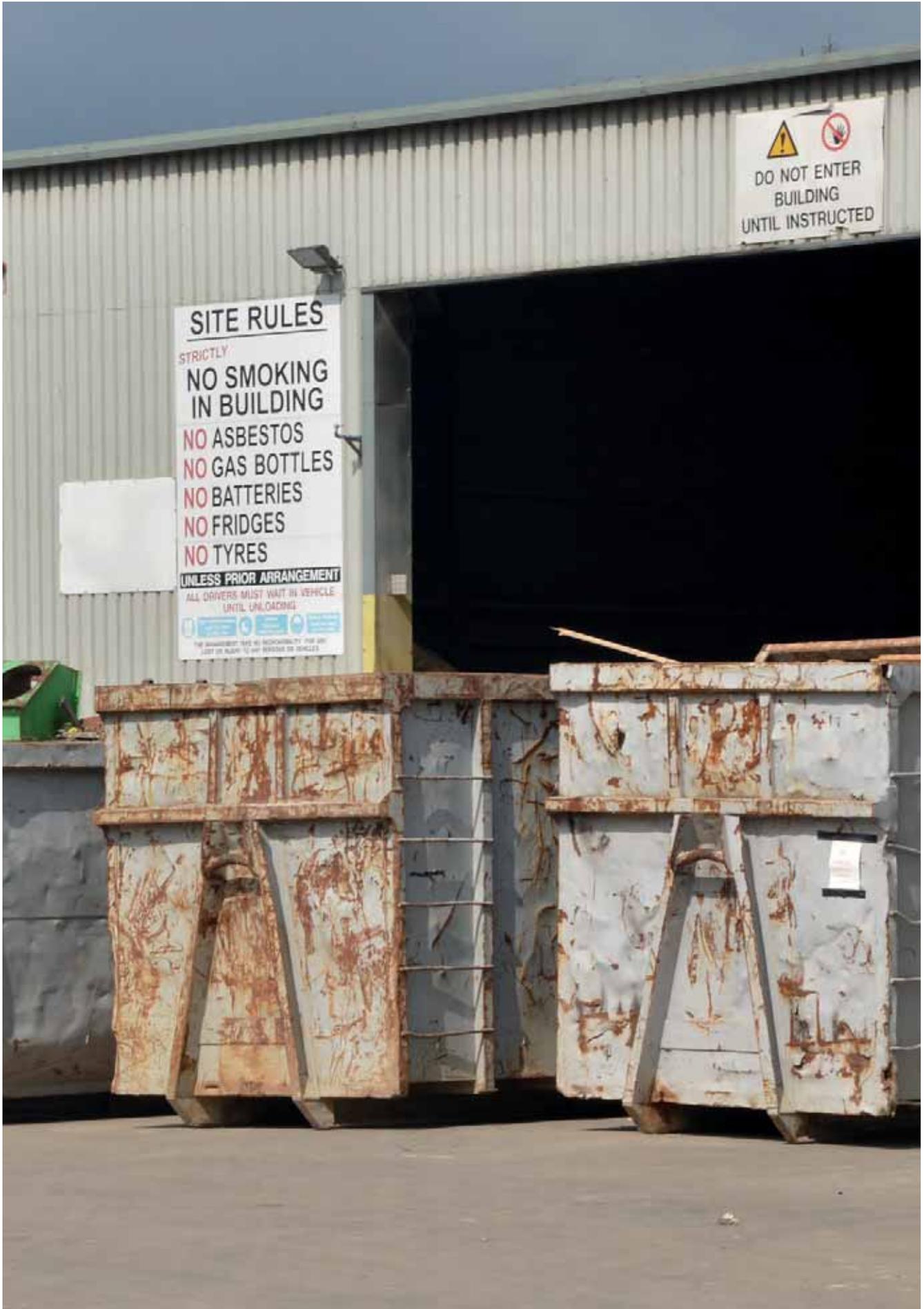
## Appendix 2 Sites and Areas from the 2011 South London Waste Plan

Ref	Name	Borough	Fate
<b>Safeguarded Sites</b>			
1	Factory Lane Waste Transfer Station	Croydon	Safeguarding carried forward as Site C5
2	Fisher's Farm Civic Amenity Site	Croydon	Safeguarding carried forward as Site C6
3	Kimpton Civic Amenity Site	Sutton	Safeguarding carried forward as Site S7
4	Purley Oaks Civic Amenity Site	Croydon	Safeguarding carried forward as Site C10
5	Pear Tree Farm Waste Transfer Station	Croydon	Safeguarding carried forward as Site C9
6	Kingston Civic Amenity Site	Kingston	Safeguarding carried forward as Site K3
9	Garth Road Civic Amenity Site	Merton	Safeguarding carried forward as Site M4
17	Country Waste Recycling Ltd	Sutton	Safeguarding carried forward as SiteS12
18	Viridor Recycling and Composting Centre	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park
19	SE Skips/Waste World Ltd	Merton	Company replaced on Site M8 by LMD Waste Management
21	777 Recycling	Sutton	Safeguarding carried forward as Site S1
22	B Nebbett and Son	Merton	Company relocated and capacity transferred to Site M12
23	Five Star Japanese Autos	Merton	No longer managing waste in the area according to the Environment Agency
25	Sloane Demolition	Merton	Safeguarding carried forward as Site M11 (now known as Morden Transfer Station)
26	Weir Road Civic Amenity Site	Merton	Closed and capacity transferred to Site M4: Garth Road Civic Amenity Site
27	SITA Transfer Station	Merton	Company replaced on Site M14 by Reston Waste Management
97	Sevenside Waste Paper	Sutton	Closed and capacity transferred to Site S11: TGM Environmental
98	Croydon Transfer Station	Sutton	Safeguarding carried forward as Site S4
100	European Metal Recycling (Therapia Lane)	Sutton	Closed and long-term vacant. Company relocated and capacity transferred to Site M2
101	Rentokil Initial Services Ltd	Merton	No longer managing waste in the area according to the Environment Agency
126	Benedict's Wharf Transfer Station	Merton	Closing and capacity transferred to Site S12: Country Waste Skip Hire
A	SafetyKleen	Croydon	Safeguarding carried forward as Site C11
B	Stubbs Mead Depot	Croydon	A feasibility study is being undertaken to understand the Local Plan housing allocation. It is due to be reported on in late October 2019. Safeguarding carried forward as Site C12.
V	Vertal	Merton	Safeguarding carried forward as Site M16 (now known as Riverside Bio)
BF	Beddington Farmlands Landfill	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park

Ref	Name	Borough	Fate
<b>Areas With Sites Which May Be Suitable For Waste Facilities</b>			
169	Willow Lane Industrial Estate	Merton	No longer needed
99	Purley Oaks Highways Depot	Croydon	No longer needed
102	Purley Way, Lysander Way, Imperial Way Industrial Estate	Croydon	No longer needed
105	Factory Lane Industrial Estate	Croydon	Safeguarding on part of area carried forward as Site C5
125	Factory Lane Industrial Estate (South Side)	Croydon	No longer needed
351	Chessington Industrial Estate	Kingston	No longer needed
252	Chessington Industrial Estate	Kingston	No longer needed
253	Chessington Industrial Estate	Kingston	No longer needed
491	Kimpton Industrial Estate	Sutton	No longer needed
532	Beddington Lane Industrial Estate	Sutton	No longer needed
533	Beddington Lane Industrial Estate	Sutton	No longer needed
534	Beddington Lane Industrial Estate	Sutton	No longer needed
535	Beddington Lane Industrial Estate	Sutton	No longer needed
539	Beddington Lane Industrial Estate	Sutton	No longer needed
5312	Beddington Lane Industrial Estate	Sutton	No longer needed
641	Durnsford Road Industrial Estate	Merton	No longer needed
642	Durnsford Road Industrial Estate	Merton	No longer needed
702	Garth Road Industrial Estate	Merton	No longer needed
1006	Wandle Valley Industrial Estate	Sutton	No longer needed

**Question Appendix 2** Do you agree with the approach of carrying forward only existing sites from the 2011 South London Waste Plan?

**Question Other** Is there anything that any other aspect of waste planning in South London that the plan ought to contain?  
(To cover Regulation 18)



## Appendix 3 Glossary

### Anaerobic Digestion

Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be useful, for example biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used on farms as a fertiliser

### Circular Economy

A circular economy is an alternative to a traditional linear economy (make-use-dispose).

In the circular economy:

- resources are kept in use for as long as possible,
- the maximum value is extracted from them while in use,
- products and materials are recovered and regenerated at the end of each service life.

### Commercial Waste

Controlled waste arising from trade premises

### Construction, Demolition & Excavation Waste

Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

### DEFRA - Department for Environment, Food and Rural Affairs

Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment

### Environment Agency

A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice

### Exemption

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within

### Hazardous Landfill

Sites where hazardous waste is landfilled. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste

### Hazardous Treatment

Sites where hazardous waste is treated so that it can be landfilled

### Hazardous Waste

Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste

### HCI

Household, Commercial and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams

### Household Waste

Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and “bring sites”

### Industrial Waste

Waste from a factory or industrial process

### Inert waste

Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater

### Inert Landfill

A landfill site that is licensed to accept inert waste for disposal

### In-Vessel Composting

A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are many different systems, but they can be broadly categorised into six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls

### ILW - Intermediate level radioactive waste

Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities

### Local Authority Collected Waste (LACW)

Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials

### Landfill

The permanent disposal of waste into the ground, by the filling of man-made voids or similar features

### Landfill Directive

European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation

### LLW – low level radioactive waste

Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

### Materials Recycling Facility (MRF)

A facility for sorting and packing recyclable waste

### Mechanical Biological Treatment (MBT)

The treatment of residual waste using a combination of mechanical separation and biological treatment

### Non-Hazardous Landfill

A landfill which is licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet the relevant waste acceptance criteria

### Non-Inert

Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change once landfilled

### Organic Waste

Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

### Open Windrow Composting

A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

### Proximity Principle

Requires that waste should be managed as near as possible to its place of production, reducing travel impacts

### Recovery

Value can be recovered from waste by recovering materials through recycling, composting or recovery of energy

### Recycled Aggregates

Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads

### Recyclate

Raw material sent to, and processed in, a waste recycling plant or materials recovery facility (e.g. plastics, metals, glass, paper/card)

### Recycling

The reprocessing of waste either into the same product or a different one

### Residual Waste

Waste remaining after materials for re-use, recycling and composting have been removed

### Waste Electrical and Electronic Equipment (WEEE)

End of life electrical or electronic equipment and covers virtually everything with a plug or battery. There are specific sites for the depollution, disassembly, shredding, recovery or preparation for disposal. The sites must meet the EU's WEEE Directive.

### Waste Hierarchy

A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal of this waste.

### Waste Local Plan

A statutory development plan prepared (or saved by the waste planning authority, under transitional arrangements), setting out policies in relation to waste management and related developments

### Waste Minimisation / Reduction

The most desirable way of managing waste, by avoiding the production of waste in the first place

### Waste Planning Authority (WPA)

The local authority responsible for waste development planning and control. They are unitary authorities, including London Boroughs and the City of London, National Park Authorities, and county councils in two-tier areas.

The WPAs for the South London Waste Plan are

- London Borough of Croydon,
- Royal Borough of Kingston,
- London Borough of Merton, and
- London Borough of Sutton

### Waste Regulation Authority

The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

### Waste Transfer Station

A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal. Although in practice, usually some recycling and management takes place as part of the sorting and baling.





