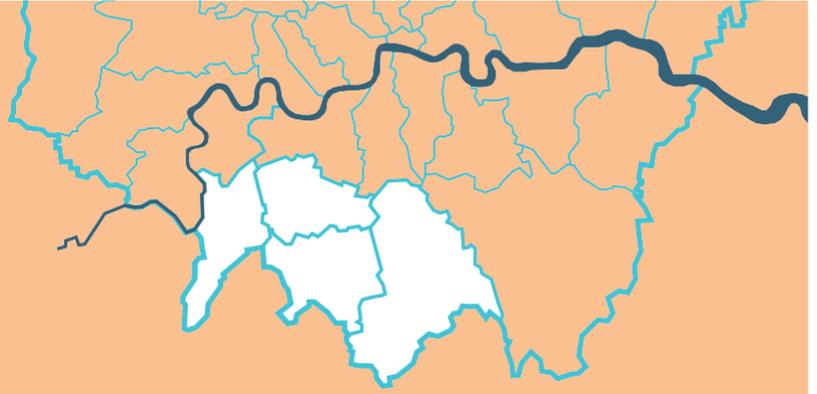


- **L B Croydon**
- **R B Kingston**
- **L B Merton**
- **L B Sutton**



# South London Waste Plan



## Evidence Base Document Reg 19 - Statement of Consultation

January 2021

**CROYDON**  
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## 1. Introduction and Legislation

1.1 This Statement of Consultation (SoC) details the actions of the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton (hereafter “The Councils”) undertook for the publication of the South London Waste Plan.

1.2 This Statement is often referred to as a Regulation 19 statement. In fact though, it is intended to meet the requirements of Regulations 19, 20, 21 and 22 of the Local Plan Regulations (SI2012/767)

1.3

### Regulation 22 (1) of the Local Plan Regulations

22.—(1) The documents prescribed for the purposes of section 20(3) of the Act are—

- (a) the sustainability appraisal report;
- (b) a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;
- (c) a statement setting out—
  - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations

## 2. Consultation Methods

2.1 The elements of the consultation were as follows:

<b>When?</b>	The publication period ran from 4 September 2020 to 22 October 2020.
<b>Who?</b>	The following groups or persons were consulted: <ul style="list-style-type: none"><li>● Specific consultation bodies, relevant authorities, general consultation bodies and residents’ groups on the LB Croydon database plus businesses and residents who expressed a wish to be on the LB Croydon consultee database</li><li>● Specific consultation bodies, relevant authorities, general consultation bodies and residents’ groups on the RB Kingston database plus businesses and residents who expressed a wish to be on the RB Kingston consultee database</li><li>● Specific consultation bodies, relevant authorities, general consultation bodies and residents’ groups on the LB Merton</li></ul>

	<p>database plus businesses and residents who expressed a wish to be on the LB Merton consultee database</p> <ul style="list-style-type: none"> <li>● Specific consultation bodies, relevant authorities, general consultation bodies and residents' groups on the LB Sutton database plus businesses and residents who expressed a wish to be on the LB Sutton consultee database</li> <li>● Prescribed bodies for Duty-to-Cooperate purposes</li> <li>● Owners of the waste sites proposed to be safeguarded</li> <li>● Members of the London Waste Planning Forum</li> <li>● Local Authorities who received or sent more than 2,500 tonnes of Household or Commercial &amp; Industrial waste, 5,000 tonnes of Construction, Demolition &amp; Excavation waste and 100 tonnes of Hazardous waste in any year between 2013 and 2017.</li> <li>● Residents and groups who responded at the Issues and Options consultation in 2019</li> </ul>
<p><b>How?</b></p>	<p>The following consultation methods were employed:</p> <ul style="list-style-type: none"> <li>● Emails and letters to: <ul style="list-style-type: none"> <li>- All on the four Councils' consultee database;</li> <li>- Owners of waste sites proposed to be safeguarded;</li> <li>- Prescribed Duty-to-cooperate purposes bodies;</li> <li>- Members of the London Waste Planning Forum;</li> <li>- Local Authorities who received or sent more than 2,500 tonnes of Household or Commercial &amp; Industrial waste, 5,000 tonnes of Construction, Demolition &amp; Excavation waste and 100 tonnes of Hazardous waste in any year between 2013 and 2017; and</li> <li>- Residents and groups who responded to the Issues and Options consultation in 2019</li> </ul> </li> <li>● Webpages on each of the four Councils' websites</li> <li>● Inclusion on the consultation portal of the Council's website, if the Council has a consultation portal</li> <li>● Documents placed at the main offices and libraries of all four Councils, where they are open</li> <li>● Press releases, where required by the SCI</li> <li>● Tweets and Facebook posts, where required by the SCI</li> </ul>

- 2.2 Therefore, the scope of the consultation extended beyond the requirements of Regulation 19 which required the Councils to

### **Regulation 19 of the Local Plan Regulations**

#### **Publication of a Local Plan**

19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

### **3. Statements of Community Involvement**

- 3.1 In addition, the consultation needs to meet the requirements of each Council's Statement of Community Involvement approved or adopted on the date the consultation started (4<sup>th</sup> September 2020). The Councils' approved or adopted Statement of Community Involvement on that date is as follows:

- LB Croydon Statement Of Community Involvement (November 2018)
- RB Kingston Statement of Community Involvement (June 2020)
- LB Merton Statement of Community Involvement (June 2020)
- LB Sutton Statement of Community Involvement (December 2019)

- 3.2 It should be noted that for the Issues and Options consultation, RB Kingston and LB Merton had Statements of Community Involvement which were over five years old and so deemed out-of-date. Consequently, it was necessary to default to the consultation requirements in the Local Plan Regulations for these two boroughs. For this consultation, however, both councils adopted new Statements of Community involvement prior to the consultation and so these new Statements of Community Involvement can be used this publication stage. In addition, LB Sutton adopted a new Statement of Community Involvement in December 2019 to replace the 2014 Statement of Community Involvement, which was used for the Issues and Options consultation.

- 3.3 The following tables set out each Council's Statement of Community Involvement Requirements and whether they have been met.

<b>London Borough of Croydon</b>			
<b>Method of Consultation</b>	<b>Required by SCI?</b>	<b>Done</b>	<b>Evidence Available</b>
Contact consultees on database	Required	YES	See appendix
Webpage	Required	YES	See appendix
Consultation portal webpage	Required	YES	See appendix
Documents in council offices and libraries	Required	YES	Delivered
Seeking hard-to-reach groups	Required	YES	Within the consultee database
Notice in local newspaper	Optional	NO	-
Advertisement in council communications	Optional	NO	-
General meetings	Optional	NO	-
Bespoke meetings	Optional	NO	-
Social media	Optional	NO	-

<b>Royal Borough of Kingston</b>			
<b>Method of Consultation</b>	<b>Required by SCI?</b>	<b>Done</b>	<b>Evidence Available</b>
Contact consultees on database	Required	YES	See appendix
Webpage	Required	YES	See appendix
Consultation Portal	Required	YES	See appendix
Documents in Guildhall 2	Required	YES	Guildhall 2 – not open but hotline to call
Seek Letter of Conformity	Required	YES	See appendix
Documents in libraries	Optional	NO	-
Those affected by policies or sites	Optional	YES	All safeguarded site owners and occupiers sent email or letter
Press release	Optional	NO	-
Existing forums and focus groups	Optional	NO	-
Display in council reception	Optional	NO	-
Notices at prominent locations	Optional	NO	-
General meetings	Optional	NO	-
Bespoke meetings	Optional	NO	-
Social media	Additional	YES	See appendix

<b>London Borough of Merton</b>			
<b>Method of Consultation</b>	<b>Required by SCI?</b>	<b>Done</b>	<b>Evidence Available</b>
Contact consultees on database	Required by Reg 19	YES	See appendix
Webpage	Required	YES	See appendix
Consultation portal webpage	Required	YES	See appendix
Document in Civic Centre	Required by Reg 35	YES	Delivered
General meetings	Optional	NO	-
Bespoke meetings	Optional	NO	-
Press notices	Optional	NO	-

<b>Council magazine</b>	Optional	<b>NO</b>	-
<b>Social media</b>	Optional	<b>YES</b>	See appendix

<b>London Borough of Sutton</b>			
<b>Method of Consultation</b>	<b>Required by SCI?</b>	<b>Done</b>	<b>Evidence Available</b>
<b>Contact consultees on database</b>	Required	<b>YES</b>	See appendix
<b>Webpage</b>	Required	<b>YES</b>	See appendix
<b>Consultation portal webpage</b>	Required	<b>YES</b>	See appendix
<b>Documents in council offices and libraries</b>	Required	<b>YES</b>	Delivered
<b>Press release</b>	Required	<b>YES</b>	See appendix
<b>Council committee meeting</b>	Required	<b>YES</b>	See appendix
<b>Social media</b>	Required	<b>YES</b>	See appendix
<b>General meetings</b>	Optional	<b>NO</b>	-
<b>Bespoke meetings</b>	Optional	<b>NO</b>	-

#### **4. Consultation Responses**

- 4.1** A total of **115** representations were received from **47** respondents on the Draft South London Waste Plan and its Sustainability Appraisal document.
- 4.2** The following table provides a summary of the main issues raised in the representations. A full list of the representations are set out in an accompanying document.

## Main Issues Arising from the Consultation

Observations	39 Representations
<ul style="list-style-type: none"> <li>● The Mayor of London commented that the plan was not in conformity with the London Plan Intend to Publish (ItP) 2019, as it fails to secure compensatory capacity of at least equivalent throughput to that which would be lost as a result of draft Policy WP3(c). There was also concerned about the implementation of the waste hierarchy.</li> <li>● Transport for London observed that three sites located in the Weir Road Industrial Area were identified in a 2015 consultation as sites to support Crossrail 2 and a reference to this should be provided.</li> <li>● National Grid highlighted a number of safeguarded waste sites that are crossed or are in close proximity to National Grid Assets and flagged up existing guidance for developing near pylons and overhead power lines.</li> <li>● Natural England had no comments to make on the plan.</li> <li>● Highways England stated it was satisfied that the consultation for Draft South London Waste Plan will not materially affect the safety, reliability and operation of the Strategic Road Network.</li> <li>● Sport England did not have any comments to make.</li> <li>● Buckinghamshire County Council did not have any comments to make.</li> <li>● Cheshire West and Chester Council confirm that it was not aware of any major proposed reductions in the current provision of waste disposal facilities that would cause strategic cross-boundary issues in terms of future waste movements.</li> <li>● The Wandle Valley Forum considered that more recognition was needed for the Wandle and commented that the plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 that has a positive impact on the River Wandle. Additionally, the response commented that protecting the amenity of those using the regional park should be reference in other Merton sites.</li> <li>● Wimbledon Park Residents' Association commented that the methodology used to assess air quality was flawed.</li> <li>● Councillor Nick Matthey for Beddington North Ward (Sutton) commented on various matters, including the general environmental impact of waste incineration, energy from waste plants, the carbon intensity of energy from waste plants, a lack of data on vehicle movement, data on gross vehicle weights, the impact of traffic and air pollution</li> <li>● The Wimbledon Society commented on the lack of proposals to improve recycling rates, the adverse impact of permitted development tights on waste and industrial sites, lack of clarity on monitoring of environmental conditions, a lack of clarity over resources for implementing the waste plan, consistency with boroughs' local plans, a suggestion of a target for energy required to run facilities.</li> <li>● The Merton Conservative Group commented that waste vehicles should have restricted access to the road network, encouraged the use of sustainably fuel vehicles and improved air quality monitoring was required. Additional comments were made on the achievability of recycling targets, the performance of waste collection providers in Merton and the need for the rest of London to improve recycling. Support was offered for being self-sufficient and for the apportionment approach.</li> <li>● The South West London Air Quality Monitoring Group objected to the continued used of the Beddington Energy Recovering Facility on</li> </ul>	

the grounds of its health impacts, climate impact and the avoidable burning of recyclables.

- The Environment Agency commented on the absence of references to national strategies and a circular economy diagram. In addition, a number of legislative changes were signposted as well as potential future changes, potential impacts of coronavirus and a need to regularly review the Technical Study. Finally, the EA commented that there was a lack of clarity on the approach taken with 'no new sites' and how this fits in with environmental permitting regulations.
- Surrey County Council commented that the additional supporting evidence, such as the quantification of the Excavation waste forecast to arise in the SLWP area over the plan period, could be beneficial to justify the approach to planning for Excavation waste.
- Historic England supported the Sustainability Appraisal commented that we consider that there should be an unambiguous policy that will ensure that the historic environment is conserved and enhanced.
- Viridor suggested that the Beddington Recycling Centre should be considered for contingency space and infrastructure for times when the ERF is not operational, and for supporting uses in association with restored landfill.
- A number of responses from local residents on various matters, including concerns about fly tipping, street cleaning, creating COVID secure workplaces, concerns about the ERF, inconsistencies between sites in the Plan and the Technical Report and a requirement of more focus on the climate emergency. In addition there was a suggestion that there should be a policy that monitors the final destination of waste, a policy on cleaning glass/plastic and concerns about very thin plastic film waste.

## Issues

<b>Key Issue 3 – Scarcity of Land</b>	1 representation
<ul style="list-style-type: none"> <li>• Viridor commented that the draft Plan does not address the matter of planning for management and maintenance of modern mechanical waste processes when facilities are temporarily unavailable.</li> </ul>	
<b>Key Issue 4 – Waste Transfer Facilities</b>	1 representation
<ul style="list-style-type: none"> <li>• Viridor commented on the importance of transfer station when facilities such as the Beddington ERF are not available and the need for flexibility in the plan for this to be addressed.</li> </ul>	

<b>Key Issue 5 – Climate Change, the End of Landfill and the Circular Economy</b>	1 representation
<ul style="list-style-type: none"> <li>Viridor supported the proposal to not safeguard the Beddington Farmlands Landfill site which closed to waste at the end of 2019 but drew attention to inert waste, which will be brought to the site until 2023. In addition Viridor suggested that the area of safeguarded at the Beddington ERF site (S2) should be expanded to accommodate future infrastructure that could contribute towards reducing carbon emissions.</li> </ul>	
<b>Vision and Objectives</b>	1 representation
<ul style="list-style-type: none"> <li>Viridor suggested added an objective to ensure Waste Management Sites that are meeting capacity requirements are capable of meeting these needs all the time, not only when the facility is operational.</li> </ul>	
<b>Policy WP1: Strategic Approach to Household Waste and Commercial and Industrial waste</b>	8 representations
<ul style="list-style-type: none"> <li>The Mayor of London objected to Policy WP1 (d) was considered to prevent new waste sites from coming forward. The Major suggested an amended policy should support new waste sites coming forward in appropriate circumstances, which could include criteria such as the site's position in the waste hierarchy and requirements around impact on amenity.</li> <li>777 Demolition and Haulage considered that the existing management appears to be an under estimate of actual capacity available in the plan area, commenting that the draft Plan and the supporting Technical Report contain inaccuracies, inconsistencies and unreasonable assumptions resulting in this under estimate. 777 Demolition and Haulage provided a detailed response to justify its view.</li> <li>SUEZ supported the inclusion of S12 to meeting apportionment and highlighted its critical role in achieving this. However, SUEZ drew attention to the fact that implementation of the permission as S12 in contingent on planning permission being granted for redevelopment of its Benedict Wharf site, which has been referred to the Mayor for decision. In addition, SUEZ objected to Policy WP1(d) as not being consistent with national policy.</li> <li>Viridor commented that WP1(a) should be amended to recognise that facilities for accommodating the temporary displacement of waste are needed, for example when facilities are closed for maintenance, WP1(c) should recognise that extension to facilities should be included to meet waste targets and WP1(d) should also recognise that waste needs to be accepted somewhere when facilities are closed for maintenance.</li> <li>Thames Water requested that the full name of the organisation was used.</li> <li>Residents questioned the need for a new plan, asked how the councils will develop efficient and effective management to eliminate</li> </ul>	

the need for additional waste capacity and asked about recycling rates.

<b>Policy WP2: Strategic Approach to Other Forms of Waste</b>	4 representations
<ul style="list-style-type: none"> <li>● Thames Water supported Policy WP2 (d) which was considered in line with the NPPF and NPPG.</li> <li>● D B Cargo consider the Policy WP2 needed be amended to include reference to its suggested safeguarding of the Chessington Railhead.</li> <li>● The South London Waste Partnership requested a modification to WP2(e) to include a reference to potential anaerobic digestions facilities to treat municipal food waste.</li> <li>● 777 Demolition and Haulage considered that the existing management appears to be an under estimate of actual capacity available in the plan area, commenting that the draft Plan and the supporting Technical Report contain inaccuracies, inconsistencies and unreasonable assumptions resulting in this under estimate. 777 Demolition and Haulage provided a detailed response to justify its view.</li> </ul>	
<b>Policy WP3: Existing Waste Sites</b>	10 representations
<ul style="list-style-type: none"> <li>● The Mayor of London commented the WP3(c) was not in conformity with the London Plan ItP which requires compensatory capacity to at least meet, and should exceed, the maximum achievable throughput of the site propose to be lost. The Mayor recommend removing the reference to case-by-case' basis in WP3(c) and add addition criteria to WP4 to reflect the London Plan requirements.</li> <li>● The Mayor of London commented that the Mayor's ambition for net waste self-sufficiency could be reflected in the wording of Policy WP3 (d) and suggested that the SLWP boroughs continue to engage with other boroughs who may have a shortfall through the Duty to Cooperate.</li> <li>● The Mayor of London supported the principle of WP3(e) that requires waste to be managed to at least the same level in the waste hierarchy. However, the Mayor considered the wording unclear and could lead to compensatory provision being made at a lower level in the waste hierarchy. As such the Mayor considers Part E to not be in conformity with the London Plan ItP.</li> <li>● King Concrete supported the safeguarded of its site (Site S8) but suggested adding "where possible" to the requirement for enclosed buildings.</li> <li>● Day Group Ltd supported draft Policy WP3.</li> <li>● D B Cargo suggested amendments were needed to include reference to its suggested safeguarding of the Chessington Railhead.</li> <li>● 777 Demolition and Haulage objected to draft Policy WP3, commenting that not allowing compensatory provision from outside the</li> </ul>	

Plan area was overly restrictive and not in conformity with the London Plan. In addition, 777 Demolition and Haulage commented the draft Plan and its technical report under estimate available capacity across the Plan area but overestimate the capacity on its site. Suggested changes were provided, including changing the policy to allow compensatory provision from outside the Plan area, recognition of additional capacity they have identified and the deletion of site S1.

- Spaces4 Work commented that the forecast arisings in the London Plan are considered to be in excess of what can be reasonably expected due to Covid-19 and C,D&E waste arisings that uses the GLA employment projections result in an overestimation. In addition the draft Waste Plan over underestimates actual capacity. Amendments to the evidence base, including Figures 13 and 15, demonstrating a larger surplus of existing waste management capacity available to manage forecast arisings/needs. Deletion of Site S5 from the schedule of sites to be safeguarded. Deletion of Site S11 from the schedule of sites to be safeguarded
- SUEZ objected to Policy WP3(d), to restrict compensatory provision from outside the SLWP area being permitted, as inflexible and inconsistent with national policy.
- Viridor supported the safeguarding of existing sites in draft Policy WP3. However, Viridor objected to the proposed redline boundary, which excludes the recycling centre that has temporary permission to 2022. Viridor suggested that WP3(b) should prefer extensions of existing sites over new separate sites. Viridor support the need for compensatory provision under WP3(C) but requested clarity over whether it applies to temporary permissions. In addition, Viridor commented suggested a number of factual updates.

**Policy WP4: Sites for Compensatory Provision**

5 representations

- The Mayor of London commented that restricting new waste sites to SILS / LSIS was not consistent with the intention of the London Plan ItP, which directs waste sites to these locations but does not restrict them to it. The Major encourages the SLWP to make changes that would allow greater flexibility for the delivery of waste sites outside of these areas.
- 777 Demolition and Haulage commented that the approach set out in Policy WP4 is less flexible and deliverable approach than the London Plan. 777 Demolition and Haulage considered that the policy intension of the London Plan, to allow compensatory capacity through the intensification of existing sites should be reflected in the SLWP.
- Spaces4 Work also commented that the approach set out in Policy WP4 is less flexible and deliverable approach than the London Plan and considered that the policy intension of the London Plan, to allow compensatory capacity through the intensification of existing sites should be reflected in the SLWP. Spaces4 work suggest that the Policy should explicitly provide for compensatory capacity for loss of safeguarded waste sites to be provided through reconfiguration and intensification of existing waste management sites, as well as provision of new sites. This would allow the SWLP to rationalise sites that are proposed for safeguarding and allow for the deletion of sites S5 and S11.
- Surrey County Council commented that the reference in WP4 (d) to “have particularly regard to” was ambiguous and suggested amendments to make the policy clear and effective.
- Viridor commented that the impact of the policy of temporary waste sites is needed.

<b>Policy WP5: Protecting and Enhancing Amenity</b>	5 representations
<ul style="list-style-type: none"> <li>• The Environment Agency supported the inclusion of previously suggested references in criteria (viii) and policies to protect and enhance amenity and deliver sustainable construction across waste management sites. The Environment Agency also commented that ongoing monitoring of policy WP5 with regards to the enclosures of waste sites, which should be applied to all the current waste sites as well as new or intensified sites. Enclosure should be within a quality building and not temporary scaffolding and plastic structures.</li> <li>• SUEZ commented that the policy requirement of WP5 (b) is too restrictive.</li> <li>• Historic England commented that the SLWP should include a policy requirement for waste development applications to assess the potential impact on the historic environment and suggested wording for inclusion. In addition Historic England suggested that the Plan references to archaeological evaluation could be improved.</li> </ul>	
<b>Policy WP6: Sustainable Design and Construction</b>	4 representations
<ul style="list-style-type: none"> <li>• The Merton Liberal Democrat Group commented that the SLWP gives no supportive evidence of a strategy of transferring to clean waste vehicle fleet, insufficient methodology as to how journeys will reduce CO2 increases on roads, no inclusion of PM2.5 data and no guidelines for drivers/staff for anti-idling driving training. The Merton Liberal Democrat Group support proposals on environmental grounds, provided that relevant policies are adhered to. However, concern was raised about how the Plan will potentially affect Local biodiversity Action Plans Targets and stated that the Plan does not contain details for increasing habitats for wildlife on existing sites. Concern was raised that the SA Framework (Objective 6) does not mention green walls. Finally concerns was raised that no new facilities were proposed in Merton, meaning that Merton will not get any benefits from biodiversity gain. The Merton Liberal Democrat Group raised concerns about the CO2 emissions from the Beddington ERF and did not consider that carbon offsetting to be acceptable as an appropriate form of CO2 reduction.</li> <li>• The Environment Agency supported Policy WP6 and supported joint enforcement action against poor performing waste sites. In addition the EA suggested that design guidance for waste management sites be developed to support implementation of the Plan and specifically assist in the delivery of CREEAM and /or CEEQUAL 'Excellent'.</li> </ul>	
<b>Policy WP7: The Benefits of Waste</b>	2 representations

- Residents asked what work was being done with local food business whose trade relies on paper and their contributions to disposal and how their practices contribute to local and national targets. In addition it was suggested that a reference to employment opportunities within waste management is included and support was offered for the Plan's approach to the circular economy.

<b>Policy WP8: New Development Affecting Waste Sites</b>	3 representations
<ul style="list-style-type: none"> <li>• Day Group Ltd supported draft Policy WP8 but suggested an amendment to improve effectiveness.</li> <li>• D B Cargo suggested amendments were needed to include reference to its suggested safeguarding of the Chessington Railhead</li> <li>• Suez supported the draft Policy.</li> </ul>	
<b>Site C1 to C13</b>	1 representation
<ul style="list-style-type: none"> <li>• Historic England requested that the Archaeological Priority Areas (APA) for Croydon sites C1 to C13 are updated to reflect Croydon's APA review which assigned the sites to Tiers I-IV</li> </ul>	
<b>Site C1: Able Waste Services, 43 Imperial Way, Croydon</b>	1 representation
<ul style="list-style-type: none"> <li>• Historic England recommended the Plan identify and reference designated heritage assets near site C1.</li> </ul>	
<b>Site C4: Days Aggregates Purley Depot, Approach Road, Croydon</b>	1 representation
<ul style="list-style-type: none"> <li>• Day Group Ltd supported the inclusion on Site C4.</li> </ul>	
<b>Site C5A: Factory Lane Waste Transfer Station, Factory Lane, Croydon</b>	1 representation

- The South London Waste Partnership commented that the operational requirements on the site may have changed and requested the potential for reconfiguration of site C5A be included in the Plan.

<b>Site C12: Stubbs Mead Depot, Factory Lane, Croydon</b>	1 representation
<ul style="list-style-type: none"> <li>• Historic England commented that, whilst the site is not located in an APA, it would require archaeological consideration as it is over 0.5 ha</li> </ul>	

<b>Site K4: Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road</b>	1 representation
<ul style="list-style-type: none"> <li>• The South London Waste Partnership commented that the operational requirements on the site may have changed and requested the potential for reconfiguration of Site K4 be included in the Plan.</li> </ul>	

<b>Proposed New Site: New Site in Kingston: Chessington Railhead, Garrison Lane</b>	1 representation
<ul style="list-style-type: none"> <li>• D B Cargo requested that the Chessington Railhead, Garrison Lane is added to the SLWP as a safeguarded site.</li> </ul>	

<b>New Site in Kingston: Land adjacent to Site K4 , part of the Hogsmill Sewage Treatment Works</b>	1 representation
<ul style="list-style-type: none"> <li>• The South London Waste Partnership commented that the only facility within the SLWP area for segregated food waste (M15) and this isn't sufficient capacity to treat all food waste currently produced by residents. The South London Waste Partnership suggested that the Hogsmill Sewage Treatment Works, adjacent to site K4 (Kingston Waste Transfer Station), presents an opportunity to consider the construction of an anaerobic digestion facility on this flank of the Hogsmill site in order to provide additional proximate</li> </ul>	

food waste treatment infrastructure to meet the needs of the Partnership area.

**Site M6: George Killoughery, 41 Willow Lane, Merton**

1 representation

- The Wandle Valley Forum commented that the SLWP should explicitly support any development of Site M6 that respects the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. In addition the Wandle Valley Forum suggested added the protection of the amenity of those using the future Wandle Valley Regional Park as an issue to consider. Finally the Wandle Valley Forum suggested including safeguarding provisions for a new public footpath along the east bank of the Wandle if development proposals come forward for Site M6.

**Site M9: Maguire Skips. Storage Yard, Wandle Way, Merton**

1 representation

- Maguire Skips supported the safeguarding of its site and requested the 'Opportunity to increase waste managed' is updated to reflect the potential for intensification of the site.

**Site M10: Powerday, Weir Court, 36 Weir Road, Merton**

2 representations

- Transport for London commented that the 'issues to consider' for Site M10 are updated for each of these sites to include a reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.
- The Wandle Valley Forum commented that the SLWP should explicitly support any development of Site M10 that respects the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. In addition the Wandle Valley Forum suggested added the protection of the amenity of those using the future Wandle Valley Regional Park as an issue to consider for Site M10.

**Site M11: Morden Transfer Station, Amenity Way, Morden**

1 representation

- SUEZ supported the safeguarding of the site

<b>Site M12: NJB Recycling, 77 Weir Road, Merton</b>	2 representations
<ul style="list-style-type: none"> <li>• Transport for London commented that the 'issues to consider' for Site M12 are updated for each of these sites to include a reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.</li> <li>• The Wandle Valley Forum commented that the SLWP should explicitly support any development of Site M12 that respects the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. In addition Site M12 should provide a sympathetic boundary to the Wandle Trail.</li> </ul>	

<b>Site M14: Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton</b>	2 representations
<ul style="list-style-type: none"> <li>• Transport for London commented that the 'issues to consider' for M14 are updated for each of these sites to include a reference to the identified requirement of these sites for Crossrail 2, and that TfL/Crossrail 2 will need to be consulted on any plans to intensify or change the use of these sites.</li> <li>• The Wandle Valley Forum commented that the SLWP should explicitly support any development of sites M14 that respects the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. In addition the Wandle Valley Forum suggested added the protection of the amenity of those using the future Wandle Valley Regional Park as an issue to consider for site M14.</li> </ul>	

<b>Site M15: Riverside AD Facility, 43 Willow Lane, Merton</b>	2 representations
<ul style="list-style-type: none"> <li>• The Wandle Valley Forum commented that the SLWP should explicitly support any development of sites M15 that respects the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. In addition the Wandle Valley Forum suggested added the protection of the amenity of those using the future Wandle</li> </ul>	

Valley Regional Park as an issue to consider. Finally the Wandle Valley Forum suggested including safeguarding provisions for a new public footpath along the east bank of the Wandle if development proposals come forward for site M15.

- Historic England recommended the Plan identify and reference designated heritage assets near site M15.

<b>Site M16: Riverside Bio Waste treatment Centre, 43 Willow Lane, Merton</b>	1 representation
<ul style="list-style-type: none"> <li>• The Wandle Valley Forum commented that the SLWP should explicitly support any development of sites M16 that respects the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space and public access along the river bank. In addition the Wandle Valley Forum suggested added the protection of the amenity of those using the future Wandle Valley Regional Park as an issue to consider. Finally the Wandle Valley Forum suggested including safeguarding provisions for a new public footpath along the east bank of the Wandle if development proposals come forward for site M16.</li> </ul>	
<b>Sutton Sites – General Comment</b>	1 representation
<ul style="list-style-type: none"> <li>• A residents commented that there were many waste operators in the Beddington area, which does not enhance the environment or living experience and that Sutton Council should focus on enhancing life in Beddington North.</li> </ul>	
<b>Site S2: Beddington Farmlands Energy Recovery Facility, 105 Beddington Lane, Sutton</b>	2 representations
<ul style="list-style-type: none"> <li>• A residents commented that the continued use of the ERF in a suburban environment is not justified or consistent with national policy, that an assessment of the cumulative impact on the highway network is needed and an expanded HGV fleet would have a negative impact on air quality.</li> <li>• The Sutton and Croydon Green Party commented that ERF will have to be closed by 2030, and plans put in place to reduce, reuse, and recycle more waste instead of sending waste to the ERF, to meet carbon neutral commitments by 2030.</li> </ul>	
<b>Site S5: Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton</b>	2 representations

- Hinton Skips supported the safeguarding of Site S5.
- Spaces4 work commented that the throughput of the site was small and requested the site not be safeguarded so the landowner can retain flexibility over its future use. Spaces4 Work considered that the loss of this site would have no significant impact on the amount of capacity available in the Plan area

**Site S8: King Concrete, 124 Beddington Lane, Sutton**

1 representation

- King Concrete supported the safeguarding of its site.

**Site S11: TGM Environmental, 122 Beddington Lane, Sutton**

1 representation

- Spaces4 Work commented that the site is not is any waste use and is occupied by Amazon, the planning permission for waste was never implemented so the proposed safeguarding for waste should be removed.

**Site S12: Beddington Lane resource recovery Facility, 79-85 Beddington Lane, Sutton**

1 representation

- A resident objected to Site S12 as having a negative impact on the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts. In addition, an expanded HGV fleet would have a negative impact on air quality.
- SUEZ commented that the implementation of the planning permission for this site is dependent upon the ability to redevelop Benedict Wharf in Mitcham, Merton, which is currently uncertain. If the Mayor of London resolves to refuse planning permission for the alternative (nonwaste) use of Benedict Wharf, the site will remain in operational waste use and BRRF will not be deliverable. The overall strategy of the SLWP would then need to be revised accordingly, which may mean, for example, considering whether site S12 could be released from safeguarding to contribute to industrial land supply

<b>Appendix 2: Sites Counting Towards the Apportionment and C&amp;D Target</b>	1 representation
<ul style="list-style-type: none"><li>• Day Group Ltd support the sites counting towards apportionment and C&amp;D target.</li></ul>	

## **APPENDIX – EVIDENCE OF CONSULTATION**

# Croydon Email to Database Consultees

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## Publication of the South London Waste Plan (B5)

1 message

Local Development Framework <LDF@croydon.gov.uk>  
To: Local Development Framework <LDF@croydon.gov.uk>

4 September 2020 at 15:57

Dear Sir/Madam,

### PUBLICATION OF THE SOUTH LONDON WASTE PLAN

I am writing to inform you that the boroughs of Croydon, Kingston, Merton and Sutton have published the **Draft South London Waste Plan** and are accepting representations on the document and its Sustainability Appraisal from **4<sup>th</sup> September to 22<sup>nd</sup> October 2020**.

I am writing to you because either you are on one of the council's planning policy consultation database or you responded to the Waste Plan Issues and Options consultation last year or you work within planning or the waste industry.

The Draft South London Waste Plan 2021-2036, produced by the London Borough of Croydon, Royal Borough of Kingston, London Borough of Merton and London Borough of Sutton, sets out the councils' strategy for waste management and waste facilities across the four boroughs. It safeguards sites to ensure that the councils' national policy requirements and London Plan targets are met. It includes policies to guide waste facility development across the area, which are to be used for deciding planning applications.



The council is contacting you as you have either registered to be informed about consultations relating to planning policy matters or is contacting you or your organisation in order to carry out a public task.

Any responses received to the consultations will be held electronically for the purposes of meeting the council's duties arising from reporting consultations. Consultation responses will be made public but your personal data will not be made public. Consultation responses will be kept for two years.

Consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer who will work for the Planning Inspector who will examine the plan. The Programme Officer may contact you using the personal information you have provided.

<https://mail.google.com/mail/u/0?ik=37b3c46560&view=pt&search=all&permthid=thread-F%3A1676915703214393368%7Cmsg-F%3A1676915703...> 2/3

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07/09/2020 RBK, LBS and AFC (unifiedgov.co.uk) Mail - Publication of the South London Waste Plan (B5)

If you wish to have your details removed from the planning policy consultation list at any time please reply to this email to [ldf@croydon.gov.uk](mailto:ldf@croydon.gov.uk) (to help this process please add remove to the title of this email and reply). By remaining on the consultation list you consent to the council holding your name, contact details and, where relevant, organisation name in order to be contacted solely for future consultations on planning policy and related matters. Your details are held electronically and will not be passed on to any third parties for marketing purposes. The council's privacy policy can be viewed [here](#).

Yours faithfully,

Local Plan Team

London Borough of Croydon

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Council services, online, 24/7 [www.croydon.gov.uk/myaccount](http://www.croydon.gov.uk/myaccount).

Please use this web site address to view the council's e-mail disclaimer - <http://www.croydon.gov.uk/email-disclaimer>

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 Statement of Representations.pdf  
256K

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## South London waste plan

Information on the current South London waste plan, and consultation on a new plan due for 2021.

Information on the current South London waste plan, and consultation on a new plan due for 2021.

The South London Waste Plan (adopted 30 January 2012) sets out the spatial issues and objectives to be met in waste management for the next ten years up to 2022. It is a joint development plan document (DPD) and covers the geographical area comprising the London Borough of Croydon, the Royal Borough of Kingston upon Thames, the London Borough of Merton and the London Borough of Sutton. It contains policies to guide the determination of planning applications for waste facilities and identifies existing waste sites to be safeguarded and areas where waste facility development may be suitable.

The South London waste plan is part of the development plan for Croydon's local plan programme. It is in conformity and should be read alongside with the policies of the Croydon Local Plan 2013.

### Latest news

The South London Waste Plan is currently being updated. A draft South London Waste Plan has been published for comments to be made. It sets out the proposed strategy of Croydon, Kingston, Merton and Sutton councils for the location of waste facilities and how planning applications will be decided. The new South London Waste Plan when adopted will cover a 15 year planning period from 2021-2036.

Publishing the draft South London Waste Plan is a formal stage in the statutory process of preparing a new Waste Plan. All comments made will be sent to a Planning Inspector appointed by the Secretary of State who will consider whether changes need to be made to the draft South London Waste Plan to make it sound.

For details of how to comment on the draft South London Waste Plan see below.

### Commenting on the draft South London Waste Plan

You can comment on the draft South London Waste Plan from Friday 4 September 2020 to 5pm on Thursday 22 October 2020. The South London Waste Plan can be downloaded at the bottom of this page. It is accompanied by a Sustainability Appraisal which can also be commented upon.

Due to COVID-19 it is not currently possible to view a paper copy of the South London Waste Plan at Croydon Council buildings. Copies have been sent to libraries and should they reopen before 22 October you will be able to view a paper copy there. In the meantime should you need to view a paper copy of the document please email [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk) or phone 020 8770 2000, explain your problem to the operator and ask him/her to contact Duncan Clarke or Dean James who will try to arrange for you to view a paper copy of the document at the offices of Sutton Council.

### How to respond

As a joint Plan all comments on the draft South London Waste Plan are being processed by Sutton Council so please send comments to:

Email: [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk)  
By post: Planning Policy, London Borough of Sutton  
24 Denmark Road, Canshelton S11 2JG

Our preferred approach would be to use the form below to make your comments

[Comment form \(word document\)](#)

# Croydon Consultation Portal Webpage

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### South London waste plan

**Why are we doing this?**

The South London Waste Plan (adopted 30 January 2012) sets out the spatial issues and objectives to be met in waste management for the next ten years up to 2022. It is a joint development plan document (DPO) and covers the geographical area comprising the London Borough of Croydon, the Royal Borough of Kingston upon Thames, the London Borough of Merton and the London Borough of Sutton. It contains policies to guide the determination of planning applications for waste facilities and identifies existing waste sites to be safeguarded and areas where waste facility development may be suitable.

The South London waste plan is part of the development plan for Croydon's local plan programme. It is in conformity and should be read alongside with the policies of the Croydon Local Plan 2018.

The South London Waste Plan is currently being updated. A draft South London Waste Plan has been published for comments to be made. It sets out the proposed strategy of Croydon, Kingston, Merton and Sutton councils for the location of waste facilities and how planning applications will be decided. The new South London Waste Plan when adopted will cover a 15 year planning period from 2021-2036.

Publishing the draft South London Waste Plan is a formal stage in the statutory process of preparing a new Waste Plan. All comments made will be sent to a Planning Inspector appointed by the Secretary of State who will consider whether changes need to be made to the draft South London Waste Plan to make it 'sound'.

**What do we want to know?**

You can comment on the draft South London Waste Plan from Friday 4 September 2020 to 5pm on Thursday 22 October 2020. The South London Waste Plan can be downloaded at the bottom of this page. It is accompanied by a Sustainability Appraisal which can also be commented upon.

Due to COVID-19 it is not currently possible to view a paper copy of the South London Waste Plan at Croydon Council buildings. Copies have been sent to libraries and should they reopen before 22 October you will be able to view a paper copy there. In the meanwhile should you need to view a paper copy of the document please email [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk) or phone 020 8770 5000, explain your problem to the operator and ask him/her to contact Duncan Clarke or Dean James who will try to arrange for you to view a paper copy of the document at the offices of Sutton Council.

**How to respond**

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As a joint Plan all comments on the draft South London Waste Plan are being processed by Sutton Council so please send comments to:

E mail: [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk)  
By post: Planning Policy, London Borough of Sutton  
24 Denmark Road, Carshalton SM5 2JG

Our preferred approach would be to use the form below to make your comments

[Comment form \(word document\)](#)

**What happens after the consultation**

All comments will be sent, along with the draft South London Waste Plan and its accompanying Sustainability Appraisal to the Planning Inspectorate. A Planning Inspector appointed by the Secretary of State will then examine the draft South London Waste Plan taking into consideration all the comments made.

The Planning Inspector will determine whether the draft South London Waste Plan has been prepared in compliance with the relevant regulations. They will also consider whether the policies in the draft Plan are supported by evidence and whether they will actually achieve what they are meant to achieve. The Planning Inspector will also check that the draft South London Waste Plan is not trying to constrain development when there is a need for that development to take place.

Once the Planning Inspector has concluded the examination, a report will be sent to the four councils detailing changes that need to be made to the draft South London Waste Plan before it can be adopted. The South London Waste Plan can then be adopted by each of the four boroughs and will become part of the statutory development plan for Croydon.

**Documents**

- Draft South London Waste Plan
- Sustainability Appraisal
- Comment Form (word document)
- Statement of Representations Procedure

Contact (for more details)  
Spatial planning team  
020 8407 1385  
[SpatialPlanning@croymdon.gov.uk](mailto:SpatialPlanning@croymdon.gov.uk)

**Project start date**  
04 Sep 2020

**Report available by**  
Due 31 January 2021

**Who can take part?**  
All - everyone invited to take part

**Topic Area**  
Environment, Planning and regeneration

**Location**  
London Borough of Croydon

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# Kingston Email to Database Consultees



Duncan Clarke <duncan.clarke@sutton.gov.uk>

---

## Consultation on the South London Waste Plan - Submission Version

1 message

Local Plan <localplan@kingston.gov.uk>  
Bcc: duncan.clarke@sutton.gov.uk

4 September 2020 at 16:59

To Whom It May Concern:

### Consultation on the South London Waste Plan - Submission Version

I am writing to inform you that the boroughs of Croydon, Kingston, Merton and Sutton have published the Draft South London Waste Plan and accompanying Sustainability Appraisal, and are accepting representations on the document and its Sustainability Appraisal from Friday 4th September to Thursday 22nd October 2020, at 5pm.

I am writing to you because either you are on one of the council's planning policy consultation database, an organisation in the planning or waste industry, or you responded to the Waste Plan Issues and Preferred Options consultation last year.

The Draft South London Waste Plan 2021-2036 sets out the councils' strategy for waste management and waste facilities across the four boroughs. It safeguards sites to ensure that the councils' national policy requirements and London Plan targets are met. It includes policies to guide waste facility development across the area, which are to be used for deciding planning applications.

To view the consultation documents, please go to: [kingstonletstalk.co.uk/south-london-waste-plan-submission-consultation](http://kingstonletstalk.co.uk/south-london-waste-plan-submission-consultation)

Attached to this email is a copy of the Statement of Representations and Consultation Response Form.

If you require paper copies of the consultation documents, please contact: [localplan@kingston.gov.uk](mailto:localplan@kingston.gov.uk)

### Consultation Information Arrangements

The council is contacting you as you have either registered to be informed about consultations relating to planning policy matters or is contacting your organisation in to carry out a public task.

Any responses received to the consultations will be held electronically to meet the council's duties arising from reporting consultations.

Please note that some consultation responses will be made public but your personal details and data will not be made public. Consultation responses will be kept for two years.

If you wish to have your details removed from the planning policy consultation list at any time please contact: [dpo@kingston.gov.uk](mailto:dpo@kingston.gov.uk)

By remaining on the consultation list you consent to the council holding your name, contact details and, where relevant, organisation name to be contacted solely for future consultations on planning policy and related matters. Your details are held electronically and will not be passed on to any third parties for marketing purposes. The council's privacy policy can be viewed [here](#).

Yours faithfully,

**Tim Naylor**  
Assistant Director for Strategic Planning & Infrastructure

The Royal Borough of Kingston upon Thames  
Guildhall 2, High Street, Kingston upon Thames KT1 1EU

Telephone: 020 8547 5000  
Email: [localplan@kingston.gov.uk](mailto:localplan@kingston.gov.uk)  
Website: [www.kingston.gov.uk](http://www.kingston.gov.uk)

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2 attachments

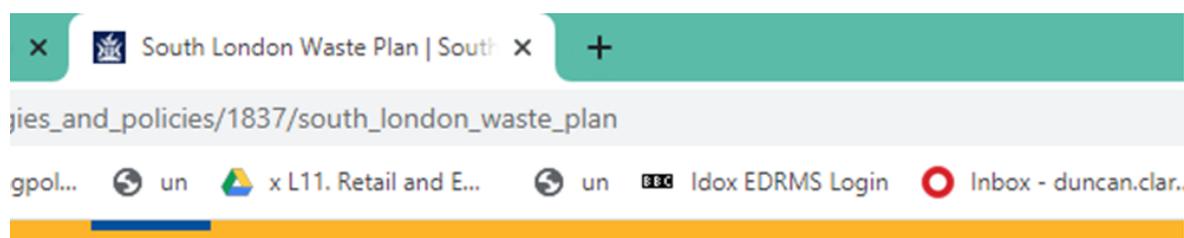
<https://mail.google.com/mail/u/0?ik=37b3c46590&view=pt&search=all&permthid=thread-f%3A1676919640575614970%7Cmsg-f%3A1676919640...> 1/2

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07/09/2020 RBK, LBS and AIC (unifiedgov.co.uk) Mail - Consultation on the South London Waste Plan - Submission Version

 Statement of Representations.pdf

## Kingston Webpage



Home > Planning and building control > Planning applications and permissions > Planning strategies and policies > **South London Waste Plan**

## South London Waste Plan

In 2012, the Royal Borough of Kingston upon Thames, along with the three London boroughs of Croydon, Merton and Sutton adopted the South London Waste Plan (Development Plan Document) 2011-2021 which allocated sites, created planning policies and designated areas for waste management development.

The plan also safeguarded existing waste sites and identified areas which may be suitable for waste use. The plan period is coming to an end and so it is necessary to prepare a new one.

The four South London Councils of Croydon, Merton, Kingston and Sutton have again agreed to prepare the South London Waste Plan. The new waste plan will cover the period from 2021 to 2036.

No new waste sites are being proposed in this new plan. The existing waste sites are being safeguarded and intensified where appropriate.

The Planning and Compulsory Purchase Act 2004 requires local planning authorities to engage and involve the local community and other interested parties in the area in the production of development plan documents, including waste plans.

The first public consultation (Issues and Preferred Options) took place between October and December 2019. Details of this previous consultation are [available online](#).

A second public consultation (Submission Version) will take place between 4 September and 22 October 2020.

To give your views on the consultation [visit Kingston Let's talk](#).

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Home > South London Waste Plan Submission Consultation

## South London Waste Plan Submission Consultation

In 2012, the Royal Borough of Kingston upon Thames, along with the three London boroughs of Croydon, Merton and Sutton adopted the South London Waste Plan (Development Plan Document) 2011-2021 which allocated sites, created planning policies and designated areas for waste management development.

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The Planning and Compulsory Purchase Act 2004 requires local planning authorities to engage and involve the local community and other interested parties in the area in the production of development plan documents, including waste plans.

The first public consultation (Issues and Preferred Options) took place between October and Development 2019. Further information about this consultation is available [here](#).

A second public consultation (Submission Version) will take place over the period beginning on Friday 4th September 2020 and **ending at 5pm on Thursday 22nd October 2020**. The consultation documents are available to download from the Documents section of this webpage.

Representations to the consultation can be made by:

- Completing the consultation response form at the bottom of this webpage
- Email: [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk)
- Post: Planning Policy, London Borough of Sutton, 24 Denmark Road, Carshalton SMS 2JG

If you would like to send representations by email or post, please complete the representation response form, which can be downloaded from the Documents section of this webpage.

If you require paper copies of the consultation documents, please contact:

Strategic Planning, Royal Borough of Kingston upon Thames, Guildhall 2, High Street, Kingston upon Thames, KT1 1EU

Email: [localplan@kingston.gov.uk](mailto:localplan@kingston.gov.uk)

Telephone: 020 8547 5000

### Who's Listening

**Strategic Planning**

Royal Borough of Kingston upon Thames

Phone: 020 8547 5000

Email: [localplan@kingston.gov.uk](mailto:localplan@kingston.gov.uk)



### Documents

- South London Waste Plan 2021-2036 Submission Draft (11.7 MB) (pdf)
- Sustainability Appraisal of the South London Waste Plan 2021-36 Submission Draft (13.6 MB) (pdf)
- Representations received on the South London Waste Plan Issues and Preferred Options Consultation (2019) (1.98 MB) (pdf)
- Consultation Response Form (PDF version) (267 KB) (pdf)
- Consultation Response Form (Word document) (133 KB) (docx)
- Frequently Asked Questions.pdf (80.6 KB) (pdf)

### Lifecycle

- Open**  
This consultation is Open for contributions.
- Under Review**  
Contributions to this consultation are closed for evaluation and review. The Project team will report

## Kingston SCI Requirement - Letter of Conformity



### *The South London Waste Plan Boroughs*

Direct Line: 020 8770 6453  
e-mail: [duncan.clarke@sutton.gov.uk](mailto:duncan.clarke@sutton.gov.uk)  
Date: 4<sup>th</sup> September 2020

**Please reply to:**

London Borough of Sutton  
24 Denmark Road Carshalton  
Surrey. SM5 2JG  
[www.sutton.gov.uk](http://www.sutton.gov.uk)

Mr Sadiq Khan  
The Mayor of London  
City Hall,  
The Queens Walk,  
London SE1 2AA

Dear Mr Khan,

#### **REQUEST FOR OPINION ON CONFORMITY WITH THE LONDON PLAN REGARDING THE DRAFT SOUTH LONDON WASTE PLAN**

In accordance with the Planning and Compulsory Act 2004, Section 24(4)(a), I am writing to you to request your opinion on the Draft South London Waste Plan's conformity with the London Plan.

The Draft South London Waste Plan is currently on its Regulation 19 publication period and I would be grateful if I could receive your opinion by the close of the publication period on 22 October 2020.

The Draft South London Waste Plan comprises the following documents for consultation:

- The Draft South London Waste Plan
- The Sustainability Appraisal on the Draft South London Waste Plan

The website link to these documents is: [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

The website also includes a comprehensive evidence base library which you may also wish to use in coming to your opinion.

If you have any questions, please do not hesitate to contact me.

Yours sincerely,

*D Clarke*

Duncan Clarke MRTPI

Strategic Planning Manager  
London Borough of Sutton

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 **Kingston Council**   
@RBKingston

The second stage of the South London Waste Plan is being consulted on. Find out more 



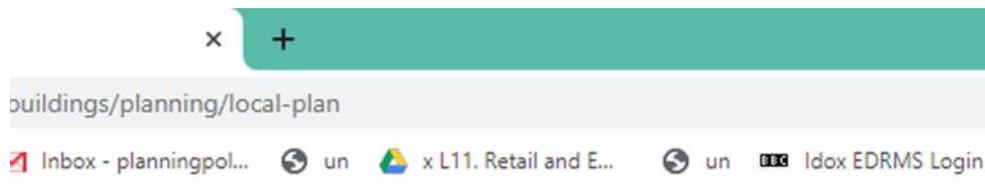
South London Waste Plan Submission Consultation  
In 2012, the Royal Borough of Kingston upon Thames, along with the three London boroughs of Croydon, Merton and ...  
[kingstonletstalk.co.uk](http://kingstonletstalk.co.uk)

3:02 PM · Sep 7, 2020 · Hootsuite Inc.



## Merton Webpage



### South London Waste Plan

The South London Waste Plan guides planning applications for developments that manage waste in the boroughs of Croydon, Kingston, Merton and Sutton.

#### New South London Waste Plan

- The South London Waste Plan 2012 is being revised. In summer 2020 councillors across all four boroughs considered the results of the public consultation held in 2019 and agreed to submit the Draft South London Waste Plan to the Secretary of State for an independent examination.

The Draft South London Waste Plan has now been published and we are seeking your views on the document and its Sustainability Appraisal. Representations and comments will be accepted from 4 September until 5pm on 22 October 2020.

Sutton Council are the project lead for the South London Waste Plan and all consultations on behalf of the above named boroughs.

All the relevant documents and further information can be viewed at:  
[www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

Following the consultation, the councils will review the representations and then send all the representations, together with the Draft South London Waste Plan, to the Planning Inspectorate. The Inspectorate will then appoint a Planning Inspector and he/she will hold an Examination-in-Public on the Draft South London Waste Plan, when he/she may invite some of those people who have made representations to give evidence in person.

#### South London Waste Plan 2012

- [South London Waste Plan](#)
- [Sustainability Report](#)
- [Adoption Statement](#)
- [South London Waste Plan - Planning Inspector's final report](#)
- [Appendix A: Schedule of soundness changes](#)
- [Appendix B - Schedule of minor changes](#)

## Merton Consultation Portal

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on.gov.uk/kms/dmart.aspx?LoggingIn=tempVar&strTab=PublicDMart&noip=1  
ContactCentre Inbox - planningpol... un x L11. Retail and E... un Idox EDRMS Login Inbox -

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Pages 1 Total results: 1

### Publication stage of the Draft South London Waste Plan

Start: 04 Sep 2020  
Ends: 22 Oct 2020



#### Why do we want your views?

The South London Waste Plan 2012 is being revised. In summer 2020 councillors across all four boroughs considered the results of the public consultation held in 2019 and agreed to submit the Draft South London Waste Plan to the Secretary of State for an independent examination.

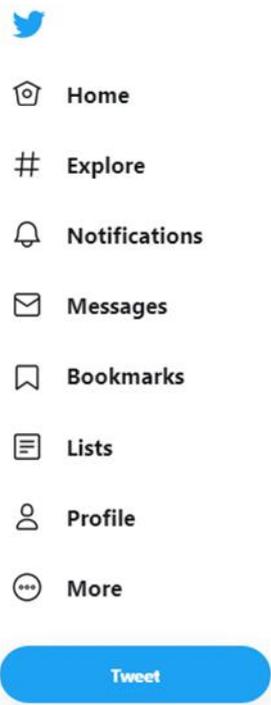
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Sutton Council are the project lead for the South London Waste Plan and all consultations on behalf of the above named boroughs.

All the relevant documents and further information can be viewed on [Sutton Council's website](#)

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@Merton\_Council

Have your say! The draft South London Waste Plan is being updated. It sets out the proposed strategy of Croydon, Kingston, Sutton and Merton councils for the location of waste facilities and how planning applications will be decided. For more information [ow.ly/ZXz050Biei2](https://ow.ly/ZXz050Biei2)



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## Sutton Webpage (Page 1 of 2)

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### Current Consultations

#### Draft South London Waste Plan

Sutton Council, along with Croydon, Kingston and Merton Councils, has published the Draft South London Waste Plan and is seeking your views on the document and its Sustainability Appraisal:

[S1: Draft South London Waste Plan](#)

[S2: Sustainability Appraisal on South London Waste Plan](#)

The Draft South London Waste Plan 2021-2036, sets out the Councils' strategy for waste management and waste facilities across the four boroughs. It safeguards sites to ensure that the Councils' national policy requirements and London Plan targets are met and it includes policies to guide waste facility development across the area, which are to be used for deciding planning applications.

The Councils are accepting representations and comments on the Draft South London Waste Plan from the 4th September until 5pm on 22 October 2020.

[Statement of Representations Procedure](#)

#### Frequently Asked Questions

##### How do I submit a comment or representation?

You can send an email to: [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk) or

Write to: Planning Policy, London Borough of Sutton, 24 Denmark Road, Carshalton, SM5 2JG.

However, the Government prefers representations in a specific format. If you wish to object to a part of the Draft South London Waste Plan, you must do it against one of the tests of soundness. In other words, you must say why:

- The plan is not positively prepared – not based on a strategy to meet need and infrastructure requirements
- The plan is not justified - not based on the most appropriate strategy
- The plan is not effective – not deliverable
- The plan is not consistent with national policy

In addition, you can object to the plan on the grounds that it is not legally compliant or the councils have not met the duty to cooperate with other councils.

Given the specific format, we would advise you to use one of these consultation response forms:

[Representation Form \(Word\)](#)

[Representation Form \(PDF\)](#)

##### Is there any background information in addition to the two documents for consultation?

Yes. There are evidence base studies and information from last year's issues and options consultation which is background information. It is called the Examination Library and the full list of documents can be found here:

**Sutton Webpage 2 of 2**

## EXAMINATION LIBRARY INDEX

Most documents have links to them within the Examination Library Index but here are the documents which do not:

### N8: Cherkley Court Judgement

E1: Representations on the Draft South London Waste Plan (to be published after the consultation closes)

E2: Regulation 12 Statement of Consultation (to be published after the consultation closes)

E3: Letter of Conformity from The Mayor of London (to be published after the consultation closes)

E4: Statement of Cooperation Part 1

E5: Statement of Cooperation Part 2

E6: Site Appraisals

E7: Deliverability Report

E8: Sequential Test

E9: South London Waste Plan Technical Paper

E10: South London Waste Plan Technical Paper Appendices

E11: PAS Legal Compliance Checklist

F1: South London Waste Plan Issues and Referred Options Document

F2: Sustainability Appraisal on the South London Waste Plan Issues and Referred Options Document

F3: Appendices to Sustainability Appraisal on the South London Waste Plan Issues and Referred Options Document

F4: Regulation 18 (Issues and Referred Options) Representations Schedule

F5: Regulation 18 (Issues and Referred Options) Statement of Consultation

F6: Sustainability Appraisal Scoping Report

F7: Sustainability Appraisal Scoping Report Representations

## How can I view a hard copy of the Draft South London Waste Plan?

Hard copies of the Draft South London Waste Plan will be available to view at the Sutton Civic Centre and in all the Sutton libraries. The civic centre is open during normal office hours but library opening hours may change, please [check the website for opening hours](#).

## What happens after the consultation?

Following the consultation, the councils will look at the representations and then will send all of the representations together with the Draft South London Waste Plan to the Planning Inspectorate. The Inspectorate will then appoint a Planning Inspector and he/she will hold an Examination-in-Public on the Draft South London Waste Plan, when he/she may invite some of those people who have made representations to give evidence in person.

## What happens if I have further questions?

If you have any further questions, you can email [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk) or phone 0205 770 5000 and ask to leave a message for Duncan Clarke or Dean James.

### Consultation Information Arrangements

The council is contacting you as you have either registered to be informed about consultations relating to planning policy matters or is contacting you or your organisation in order to carry out a public task.

Any responses received to the consultations will be held electronically for the purposes of meeting the council's duties arising from reporting consultations. Consultation responses will be made public but your personal data will not be made public. Consultation responses will be kept for two years.

Consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer who will work for the Planning Inspector who will examine the plan. The Programme Officer may contact you using the personal information you have provided.

If you wish to have your details removed from the planning policy consultation list at any time please contact [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk). By remaining on the consultation list you consent to the council holding your name, contact details and, where relevant, organisation name in order to be contacted solely for future consultations on planning policy and related matters. Your details are held electronically and will not be passed on to any third parties for marketing purposes. The council's privacy policy can be viewed [here](#).

# Sutton Consultation Portal



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## Response Form for The Draft South London Waste Plan Consultation

### Overview

The Draft South London Waste Plan 2024-2026, sets out the council's strategy for waste management and waste facilities across the four boroughs. It safeguards sites to ensure that the council's national policy requirements and London Plan targets are met. It includes policies to guide waste facility development across the area, which are to be used for deciding planning applications.

Links to the South London Waste Plan and the Sustainability Appraisal can be found at the bottom of this page under related information.

Further information can be found in the Examination Library Index ([opens in new window](#)).

Closes 22 Oct 2020

Opened 4 Sep 2020

Results expected 23 Nov 2020

Feedback expected 1 Apr 2021

#### Contact

Planning Policy Team  
020 8770 5000  
[planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk)

### Why We Are Consulting

The draft South London Waste Plan is published in order for representations to be made prior to submission to the Government. The representations will be considered alongside the published plan when submitted, which will be examined by a planning inspector. The Planning and Compulsory Purchase Act 2004 (as amended) states that the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

The Government prefers representations in a specific format. If you wish to object to a part of the Draft South London Waste Plan, you must do it against one of the tests of soundness. In other words, you must say why:

- The plan is not positively prepared - not based on a strategy to meet need and infrastructure requirements
- The plan is not justified - not based on the most appropriate strategy
- The plan is not effective - not deliverable
- The plan is not consistent with national policy

In addition, you can object to the plan on the grounds that it is not legally compliant or the councils have not met the duty to cooperate with other councils.

On the following page guidance notes are provided which explain in greater detail legal compliance, compliance with the duty to cooperate and soundness.

To make comments on the draft South London Waste Plan, the councils welcome responses using this online form.

The consultation opens on Friday 4 September and the deadline for representations is 2pm on Thursday, 22 October.

Any representations will be held electronically for the purposes of meeting the council's duties arising from reporting consultations. Representations will be made public but your personal data will not be made public. Consultation responses will be kept for two years.

Representations and your personal data will be passed to the Planning Inspectorate and a Programme Officer who will work for the Planning Inspector who will examine the plan. The Programme Officer may contact you using the personal information you have provided.

For more information on how Sutton processes your personal information please visit our [Privacy Notice](#) ([opens in a new window](#)). Any comments you make may be made public on the Council's website however we will remove all personally identifiable information.

Give Us Your Views

## Sutton Committee Meeting

Committee as part of the presentation of the Authority Monitoring Report

3. That the need for Article 4 Direction or other council interventions be reviewed, should the number of HMOs increase significantly and complaints about them increase significantly, and/or the amount of 3+-bedroom housing begins to decrease significantly.

19. **Authority to consult on and submit to the Secretary of State the draft South London Waste Plan** PDF 182 KB

- [View the background to item 19.](#)
- [View the decision for item 19.](#)

As part of the Ambitious for Sutton vision to make the borough a great place to live and work, representations on the draft South London Waste Plan will be sought prior to its submission to the Secretary of State for Housing, Communities and Local Government.

**Minutes:**

The Head of Development Management and Strategic Planning introduced the report. Members discussed the conformity of the plan with the London Plan, designation of sites, the levels of waste handled in each of the boroughs and the priority being given to reduce waste across the boroughs.

**RESOLVED**

That authority be given to publish the Draft South London Waste Plan and associated documents, Appendices A and B, in order that representations may be made (a Regulation 19 representation stage).

20. **Authority to Consult on the Draft Cheam Village Conservation Area Character Appraisal and Management Plan** PDF 132 KB

## Sutton Facebook Post (also serves as Press Release)

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Write a comment...

Top fan

Alan Courtney

Your statement also doesn't take account of the OFSTED report comment regarding the dissatisfaction of a large group of parents nor the failure of ANY parent groups or charities to endorse your actions or strategies...

Like · Reply · 16 h

View 3 more comments

Sutton Council

22h · 🌐

The Draft South London Waste Plan Consultation is now open. We are proposing with neighbouring Councils that there should be no new waste sites. Have your say: <https://buff.ly/3jNc/mW...> See more

1 comment 13 shares

👍 Like
💬 Comment
🔗 Share

Most relevant ▾

Write a comment...

Top fan

Josh Miles

It's all very well discussing wether or not to have new waste sites, but why don't you start at the basics, like making sure every household has enough bins and getting them collected weekly?

Like · Reply · 10 h

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The Draft South London Waste Plan Consultation is now open.

We are proposing with neighbouring Councils that there should be no new waste sites.

Have your say: [buff.ly/3jNcJmW](https://buff.ly/3jNcJmW)

Submit your views by 22 October



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## Statement of Representations Procedure (sent to all database consultees) 1 of 4



### **Draft South London Waste Plan (Submission Version – Regulation 19) Publication Stage Representations Statement**

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#### **Title of Document:**

**South London Waste Plan – Draft for Submission to Government  
(Regulation 19)**

#### **Subject Matter and Area Covered:**

The Draft South London Waste Plan 2021-2036, produced by the London Borough of Croydon, Royal Borough of Kingston, London Borough of Merton and London Borough of Sutton, sets out the councils' strategy for waste management and waste facilities across the four boroughs. It safeguards sites to ensure that the councils' national policy requirements and London Plan targets are met. It includes policies to guide waste facility development across the area, which are to be used for deciding planning applications.

Alongside the Draft South London Waste Plan, the councils are consulting on the Draft South London Waste Plan Sustainability Appraisal.

#### **Period within which representations must be made:**

Representations can be made over the period beginning Friday, 4 September 2020 and ending at 5pm on Thursday 22 October 2020.

#### **Representations must be sent to:**

**E mail:** [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk)  
**By post:** Planning Policy, London Borough of Sutton  
24 Denmark Road, Carshalton SM5 2JG

#### **How to make representations:**

During this consultation, the representations must be made against the following criteria:

- Legal Compliance
- Soundness
  - (i) Positively Prepared
  - (ii) Justified
  - (iii) Effective
  - (iv) Consistent with National Policy
- Compliance with the Duty to Cooperate

## Statement of Representations Procedure 2 of 4

Therefore, it is strongly advised that representors use the standard representations form at [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

### **Where to view the Documents:**

The Draft South London Waste Plan and the Sustainability Appraisal can be viewed on line at:

**Croydon website:**

<https://new.croydon.gov.uk/planning-and-regeneration/planning/planning-policy/croydons-development-plan/south-london-waste-plan>

**Kingston website:**

[https://www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/1837/south\\_london\\_waste\\_plan](https://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1837/south_london_waste_plan) or  
<https://kingstonletstalk.co.uk/admin/projects/south-london-waste-plan-submission-consultation>

**Merton website:**

<https://www.merton.gov.uk/planning-and-buildings/planning/local-plan>

**Sutton website:**

[www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations) or  
<https://sutton.citizenspace.com/>

or in paper form at the following locations:

### **London Borough of Croydon**

<b>Ashburton Library</b> Shirley Road, CR9 7AL Tel: 020 7884 5175	Currently operating a select and collect service: <a href="https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service">https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service</a>
<b>Bradmore Green Library</b> Bradmore Way, CR5 1PE Tel: 020 7884 5220	Closed as of August, please phone for update
<b>Broad Green Library</b> 89 Canterbury Road, CR0 3HH Tel: 020 7884 5210	Closed as of August, please phone for update
<b>Central Library</b> Katharine Street, Croydon CR9 1ET Tel: 020 7884 5140	Currently operating a select and collect service: <a href="https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service">https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service</a>
<b>Coulsdon Library</b> Brighton Road, CR5 2NH Tel: 020 7884 5180	Currently operating a select and collect service: <a href="https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service">https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service</a>
<b>New Addington Library</b> 61 Central Parade, CR0 0JD Tel: 020 7884 5205	Closed as of August, please phone for update
<b>Norbury Library</b> Beatrice Avenue, London SW16 4UW Tel:	Close until the autumn for renovations
<b>Purley Library</b> Banstead Road, CR8 3YH Tel: 020 7884 5160	Closed as of August, please phone for update
<b>Sanderstead Library</b> Farm Fields, Sanderstead CR2 0HL Tel: 020 7884 5165	Closed as of August, please phone for update
<b>Selsdon Library</b> Addington Road, CR2 8LA Tel: 020 7884 5190	Currently operating a select and collect service: <a href="https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service">https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service</a>
<b>Shirley Library</b>	Closed as of August, please phone for update

## Statement of Representations Procedure 3 of 4

Wickham Road / Hartland Way, CR0 8BH Tel: 020 7884 5170	
<b>South Norwood Library</b> Lawrence Road, SE25 5AA Tel: 020 7884 5195	Closed as of August, please phone for update
<b>Thornton Heath Library</b> Brigstock Road, CR7 7JB Tel: 020 7884 5185	Currently operating a select and collect service: <a href="https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service">https://www.croydon.gov.uk/leisure/libraries/library-select-and-collect-service</a>
<b>Upper Norwood Library Hub</b> 39-41 Westow Hill Upper Norwood SE19 1TJ Tel: 020 8670 4389	Renovations taking place, please phone for an update

### Royal Borough of Kingston

<b>Royal Borough of Kingston upon Thames</b> Guildhall 2 High Street Kingston upon Thames. KT1 1EU Tel: 020 8547 5002	<b>Mon:</b> 9:00-17:00 <b>Tues:</b> 10.00-17.00 <b>Wed-Fri:</b> 9.00-17.00
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### London Borough of Merton

<b>London Borough of Merton</b> Civic Centre London Road Morden. SM4 5DX Tel: 020 8274 4901	<b>Mon-Fri:</b> 9:00-17:00
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### London Borough of Sutton

<b>Civic Offices</b> Sutton Central Library, St Nicholas Way, Sutton SM1 1EA Tel: 020 8770 5000	<b>Mon-Fri:</b> 9:00-17:00
<b>Sutton Central Library</b> St Nicholas Way, Sutton SM1 1EA	<b>Mon-Wed:</b> 10am - 4pm. <b>Thurs:</b> 1pm - 7pm <b>Fri:</b> 10am - 4pm. <b>Sat:</b> 10am - 2pm
<b>Cheam Library</b> Church Road, Cheam, SM3 8QH	<b>Wed:</b> 10am-4pm. <b>Fri:</b> 10am-4pm
<b>Circle Library</b> Green Wrythe Lane, Carshalton, SM5 1JJ	<b>Wed:</b> 10am - 4pm. <b>Fri:</b> 10am - 4pm
<b>Library @ Sutton Life Centre</b> Alcorn Close, Sutton, SM3 9PX	<b>Tues:</b> 10am-4pm. <b>Thurs:</b> 10am-4pm
<b>Library @ Phoenix Centre</b> Mollison Drive, Roundshaw, Wallington, SM6 9NZ	<b>Tues:</b> 10am-4pm. <b>Thurs:</b> 10am-4pm
<b>Wallington Library</b> Shotfield, Wallington, SM6 0HY	<b>Tues-Wed:</b> 10am - 4pm. <b>Thurs:</b> 1pm - 7pm <b>Fri:</b> 10am - 4pm. <b>Sat:</b> 10am - 2pm
<b>Worcester Park Library</b> Stone Place, Windsor Road, Worcester Park, KT4 8ES	<b>Tues-Wed:</b> 10am - 4pm. <b>Thurs:</b> 1pm - 7pm <b>Fri:</b> 10am - 4pm. <b>Sat:</b> 10am - 2pm
<b>Westcroft Library</b> Westcroft Leisure Centre, Westcroft Road, Carshalton, SM5 2TG	<b>Mon-Wed:</b> 10am-4pm. <b>Thurs:</b> 1pm-7pm <b>Fri:</b> 10am-4pm. <b>Sat:</b> 10am-2pm

**Please note:** The details for principal offices and libraries are correct as of August but may change due to circumstance. If you are having trouble viewing a hard copy of the documents, please email: [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk) or phone 020 8770 5000, explain your problem to the operator and ask him/her to contact Duncan Clarke or Dean James, who will resolve the issue.

## Statement of Representations Procedure 4 of 4

### Consultation Information Arrangements

Any representations received to the publication will be held electronically for the purposes of meeting the council's duties arising from reporting consultations. Representations will be made public but your personal data will not be made public. Consultation responses will be kept for two years.

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