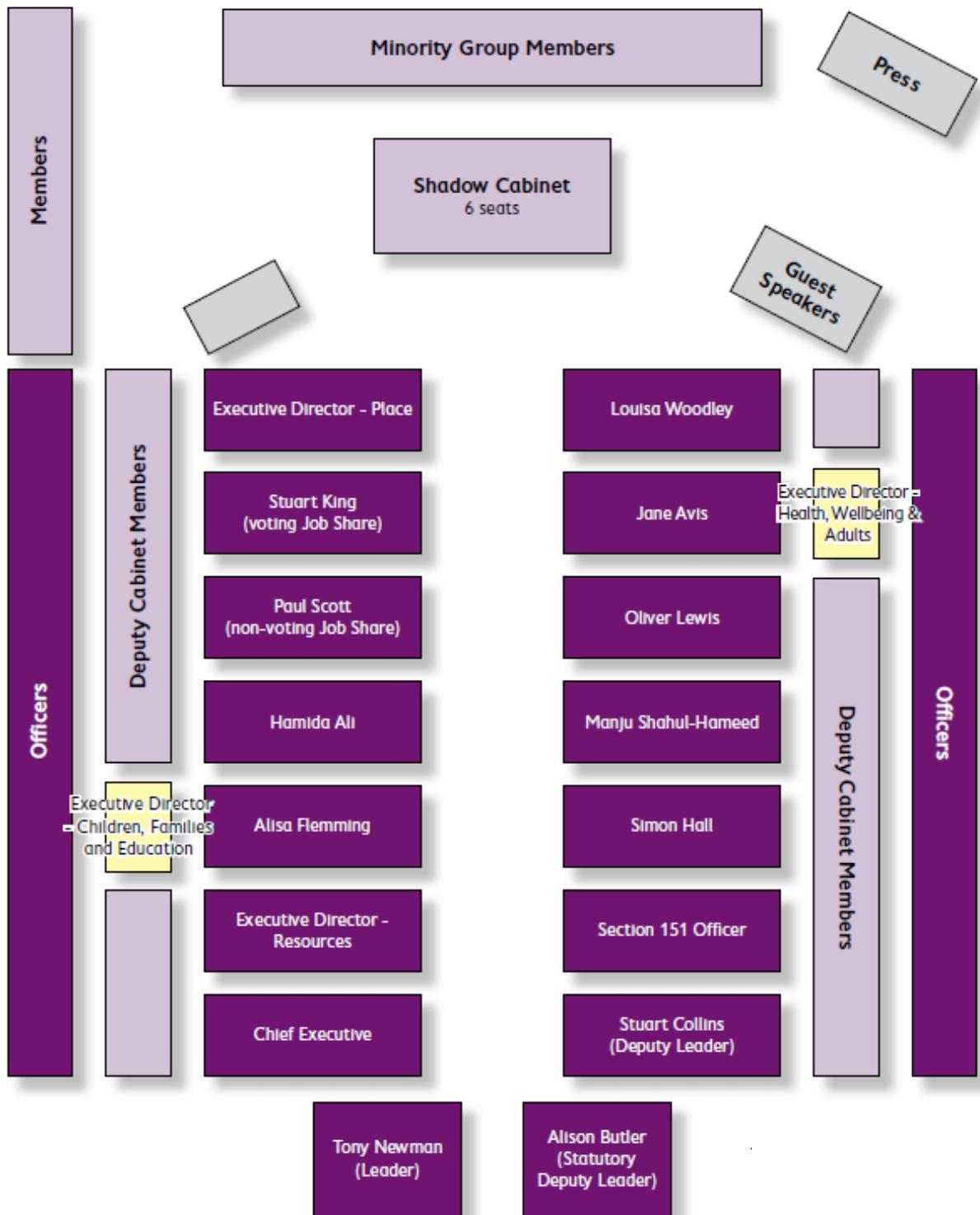




**CABINET
AGENDA**
for the meeting
on
8 June 2020 at
6.30 pm

Cabinet Seating Plan



To: Croydon Cabinet Members:

Councillor Tony Newman, Leader of the Council - Budget and Strategic Policy

Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes & Gateway Services

Councillor Stuart Collins, Deputy Leader and Cabinet Member for Clean Green Croydon

Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities

Councillor Jane Avis, Cabinet Member for Families, Health & Social Care

Councillor Alisa Flemming, Cabinet Member for Children, Young People & Learning

Councillor Simon Hall, Cabinet Member for Finance & Resources

Councillor Stuart King, Cabinet Member for Environment, Transport & Regeneration (Voting - Job Share)

Councillor Oliver Lewis, Cabinet Member for Culture, Leisure & Sport

Councillor Paul Scott, Cabinet Member for Environment, Transport & Regeneration (Non-Voting - Job Share)

Councillor Manju Shahul-Hameed, Cabinet Member for Economy and Jobs

Invited participants:

Councillor Louisa Woodley, Chair of the Health & Wellbeing Board

All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Monday, 8 June 2020 at 6.30 pm. This meeting will be held remotely.**

Members will be sent a link to remotely attend the meeting in due course.

JACQUELINE HARRIS BAKER
Council Solicitor and Monitoring Officer
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www.croydon.gov.uk/meetings
29 May 2020

PLEASE NOTE: Members of the public are welcome to remotely attend this meeting via a weblink which will be publicised on the Council website at least 24 hours before the meeting.

The agenda papers for all Council meetings are available on the Council website www.croydon.gov.uk/meetings

If you require any assistance, please contact Victoria Lower
020 8726 6000 x14773 as detailed above.

AGENDA – PART A

1. Apologies for Absence

2. Minutes of the previous meeting (Pages 7 - 28)

To approve the minutes of the meeting held on 11 May 2020 as an accurate record.

3. Disclosure of Interests

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

4. Urgent Business (If any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

Cabinet Member: Leader of the Council

5. Croydon Together: Update on our ongoing response to Covid-19 (Pages 29 - 44)

Officer: Jo Negrini
Key decision: no

Cabinet Member: Leader of the Council

6. Developing a sustainable economic recovery and renewal plan for Croydon (Pages 45 - 62)

Officer: Shifa Mustafa
Key decision: no

Cabinet Member: Cabinet Member for Environment, Transport & Regeneration (Job Share)

7. South London Waste Plan - Publication of Proposed Submission draft and Submission to the Secretary of State (Pages 63 - 620)

Officer: Shifa Mustafa

Key decision: yes

Cabinet Member: Cabinet Member for Safer Croydon & Communities

8. Equality Annual Report (Pages 621 - 714)

Officer: Jo Negrini and Jacqueline Harris Baker

Key decision: no

Cabinet Member: Children, Young People & Learning

9. Children, Young People & Families Plan (Pages 715 - 744)

Officer: Robert Henderson

Key decision: no

Cabinet Member: Leader of the Council

10. Recommendations from the Citizen's Assembly on Climate Change (Pages 745 - 792)

Officer: Shifa Mustafa

Key decision: yes

Lead Member: Chair of Scrutiny & Overview

11. Stage 1: Recommendations from Scrutiny (To Follow)

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Member: Cabinet Member for Finance & Resources

12. Investing in our Borough (Pages 793 - 800)

Officer: Jacqueline Harris Baker

Key decision: no

13. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

Cabinet

Meeting held on Monday, 11 May 2020 at 6.30 pm. This meeting was held remotely

MINUTES

Present: Councillor Tony Newman (Chair)

Councillor Alison Butler, Stuart Collins, Hamida Ali, Jane Avis, Alisa Flemming, Simon Hall, Stuart King (non-voting – Job Share), Oliver Lewis, Paul Scott (voting – Job Share) and Manju Shahul-Hameed

Also Present: Councillor Tim Pollard, Jason Cummings, Jason Perry, Mario Creatura, Maria Gatland, Lynne Hale, Simon Hoar, Yvette Hopley, Vidhi Mohan, Helen Pollard, Sean Fitzsimons, Robert Ward, Pat Clouder, Clive Fraser, Helen Redfern, Leila Ben-Hassel, Margaret Bird, Simon Brew, Janet Campbell, Patsy Cummings, Nina Degrad, Bernadette Khan, Shafi Khan, David Wood and Louisa Woodley

PART A

The Leader invited all present to join them in a minute's silence in remembrance of all those who had sadly passed away due to the covid-19 pandemic.

The Leader noted that the council had supported the vulnerable residents of Croydon throughout the pandemic and continued to battle to secure PPE for those working on the frontline, including those working in care homes. The very close working with the NHS, through the One Croydon Alliance, was highlighted as supporting a coordinated response and putting the borough in a stronger position to respond than it may have been.

The Leader thanked everyone who had supported the response to the crisis and highlighted the work of the CVA, food banks, residents' associations and the people of Croydon who had stepped up to respond positively to the pandemic. Additionally, the Leader thanked all the officers of the council who had worked to ensure that residents had received the support they needed.

26/20 **Minutes of the previous meeting**

The part A minutes of the Cabinet meeting held on 24 February 2020 were agreed.

27/20 **Disclosure of Interests**

There were none.

28/20

Urgent Business (If any)

There were no items of urgent business.

29/20

Update on Croydon's response to Covid-19

The Director of Public Health noted that the report circulated within the agenda was written on 3 May and since that date there had been nationally an increasing number of people who had been tested and sadly an increase in the number of people who had died. It was, however, noted that there had been a slowing down of the rate of cases.

Whilst most people suffered from mild symptoms, primarily a fever and cough, severity did appear to increase with age. With most people suffering mild symptoms only, it was stated that many people may have had covid-19 but were unaware of it.

Of those who had contracted covid-19, the Director of Public Health stated that 15% had been admitted to hospital and 5% had been admitted to intensive care.

Whilst it was noted that infections had peaked, in terms of those being diagnosed, due to the population practising good social distancing; the pandemic was not over. The curve, it was stated, had been flattened artificially through the lockdown. The risk remained that there may be a second or third peak in cases and as such, the Director of Public Health stressed that the nation was in a dangerous period of the pandemic and so it was important people continued to socially distance.

The Director of Public Health stated that everyone had come together at a difficult time to tackle the most significant public health issue for a century. It was important, she reiterated, that everyone needed to maintain their resolve until there was a vaccination or a scientific intervention.

The Chief Executive of the council informed Members that Croydon had the largest care market in London with 123 care homes of which 63 worked with older residents. The situation for care homes had been chronic and the council had been working closely with the sector to support them through this terrible time, however unfortunately a number of residents had passed away due to the virus.

Members were informed that the council had worked closely with care homes to ensure they had the right support, training and PPE for their staff. It was stated that the council had been the care homes main supplier of PPE during the crisis. Work continued with the care homes, and the council maintained daily communication with them and were ensuring staff had access to testing. The Chief Executive informed Cabinet that the Director of Public Health had been appointed as the Borough's lead on testing and tracing in care homes.

It was noted that PPE had been a topical issue throughout the pandemic and that in the early days of the crisis, supply had been a major issue. However, due to the work of officers and through the pan-London local authority network, this concern had been addressed and the council had ensured that staff and care homes had sufficient supplies throughout the pandemic and work had begun to ensure schools had supplies also. The Chief Executive thanked the procurement team for their tireless work in securing supplies of PPE.

The Chief Executive informed Members that the council had received a database from the government of over 11,000 residents that required shielding. Whilst the government was providing food supplies for those residents, the council had provided additional supplies where required. Every resident on the shielded list had been contacted so they were aware of how to contact the council for support. The council had also worked closely with the NHS to ensure residents had their medicines delivered.

It was noted that there had been an increase in the number of residents requiring the support of food banks and the council had sought to support the community sector. An emergency grant scheme for the sector had been established for grants up to £10,000 and due to over-subscription, the council was looking to set up a second phase to continue supporting the sector.

Street homelessness had been another area of focus for the council and it had worked to support the GLA in providing accommodation for people including central London rough sleepers during the pandemic.

Cabinet was informed that the majority of schools had remained open during the pandemic, with 90 schools open on 7 May 2020. The majority of the children attending school were the children of key workers and the council continued to support vulnerable children to access education. All vulnerable children had been contacted by children's services to ensure they were receiving the support they required.

The Chief Executive stated that the council was provided funding by government to issue business grants with an accumulative value of £38m. To ensure due diligence of the grants, the council had required businesses to complete short surveys after which the grant monies were released.

Members were informed that the key priorities going forward were to continue supporting vulnerable residents through the crisis. When moving from a health crisis to recovery it was important that the council supported the restarting of the economy to provide both economic and environmental stability.

In terms of the council resuming services, the Chief Executive advised that the key concern was a possible second or third wave of the pandemic

and ensuring staff safety. As such, it was noted that social distancing guidance in the workplace would be important and the council had begun to look at the implications of social distancing. It was stated that Bernard Weatherill House would have a staff capacity of 20%, circa 375, and so it was important to assess priority services to return to the office. Not only did the council need to review its office space to ensure it was safe and the return of staff was well managed, but also leisure centres, libraries and museums. To ensure the safety of staff, PPE would be provided for the office and for commutes and through the support of Croydon University Hospital (CUH) staff would have access to testing. The Chief Executive stressed her thanks to the hospital during this period and the importance of the strong partnership.

Mike Bell, Chair of CUH Board, gave Cabinet an overview of the impact of covid-19 on the NHS and started by thanking all staff for their help and support during this period.

It was noted that London had been hit hard by covid-19 and Croydon had been hit particularly hard and early on during the pandemic. Much like, Brent and Newham, it was noted that a number of residents in Croydon had diabetes, hypertension and other underlying health conditions which were known to have an impact on people's ability to survive the virus.

Members were informed that CUH had admitted 937 patients who had tested positive for covid-19 and sadly 265 of those patients had passed away.

In terms of trends, three weeks previous the hospital had around 250 covid-19 positive patients admitted whereas on the day of the meeting there were around 50 patients with covid-19 in the hospital. Not only were there fewer numbers of patients, it was noted that the number of new cases being diagnosed was also reducing. Whilst the curve of infections had been flattened it was stressed that the threat of covid-19 continued.

Members were informed that Mike Bell was happy to attend future Cabinet and committee meetings to discuss the resilience of the NHS in terms of ongoing covid-19 and returning services to the hospital. It was noted that partnership work with the council and all parts of the health sector had been integral to driving the borough's response to the pandemic.

Mike Bell advised Members that the NHS in Croydon had prepared for covid-19 and had sought to maintain as many of its core services as possible and would seek to reintroduce more services in the next month.

Whilst covid-19 had been devastating, it was noted that it had pushed for the development of services with over 80% of outpatient activity now taking place on the telephone which was hoped would continue. Intensive care capacity had also increased from 15 to 37 beds and high dependency care capacity had increased from 37 to 59. Again, it was

anticipated this increased capacity would be maintained following the pandemic.

Members were informed that primary care had been transformed over this period with video conferencing appointments. However, practices had also remained open for business and patients were encouraged to speak with primary care practitioners if they were unwell as it was feared that people were avoiding accessing health services due to covid-19.

The role of pharmacy care was highlighted as having been vital to the response to the pandemic and had facilitated the expansion of prescribing and home delivery of medicines to those self-isolating.

Whilst it was noted that there had a huge amount of coverage of NHS workers struggling to access PPE, Members were advised that CUH had maintained full supplies of WHO compliant PPE throughout the pandemic. Supplies had been of a sufficient level to enable the hospital to respond to emergency calls for PPE for care homes.

The strain of working during this period was noted as being deeply traumatic and the hospital had put in place additional mental health support for staff and had worked with the trade unions to ensure the health and safety of all staff.

It was recognised that covid-19 was not an equal opportunities virus and had impacted poorer communities and BAME communities harder. CUH were working to analyse the admissions data and were cross referencing it to demographic information to gain a greater understanding of the impact of the virus. Early indications suggested there was a link between cardiovascular diseases and body mass index however more work would be undertaken to gain a greater understanding of the virus and to support working with the communities. It was recognised that it was imperative that more work focussed on conquering health inequalities.

The Chair of CUH Board thanked the people and businesses of Croydon for their amazing support during this time. Over 1,000 meals were being delivered per day as were treats such as Easter eggs. Schools were also recognised for their work to create additional equipment for hospital staff. It was stressed that supporting staff welfare was integral to the hospital and all support was appreciated.

The Chief Executive thanked all partners, and in particular NHS partners, for their work during this period and noted that the partnership and integration which had been developed over the preceding years had enabled the borough to respond and support its residents. All council staff were thanked for their work to ensure the council was able to continue providing core services and frontline contractors were thanked for their commitment to delivering services.

The Leader thanked the Chief Executive, Director of Public Health and the Chair of the CUH Board for all their work during this period and noted that CUH would play a leading role in furthering understanding of the virus' impact on health inequalities.

The Statutory Deputy Leader and Cabinet Member for Homes & Gateway Services thanked all those who had responded to support the most vulnerable residents and highlighted the work of Evolve, Thames Reach and others which had been working with the homeless sector to ensure rough sleepers were not left on the streets.

The Cabinet Member highlighted the work of the Gateway Service which was already in place to support those impacted by Welfare Reform. This service, it was noted, had been able to step up and support those in need.

The work of caretakers and the responses repair service were thanked for ensuring repairs continued to take place, so residents had heating and safe homes. The Cabinet Member stated that the crises had highlighted the importance of people having a home to call their own and this remained a priority for the council.

The Cabinet Member for Clean Green Croydon thanked council officers, in particular Steve Iles and Tom Lawrence, who had worked with Veolia during this challenging time to ensure residential bin collections still took place. Members were informed that the Cabinet Member had written to Veolia staff to personally thank them for their commitment.

The enforcement team was also thanked by the Cabinet Member as it was noted that a small minority of residents had continued to fly-tip during the lockdown and these had been caught with the 47th vehicle being seized during the period.

Members were informed that from Wednesday 13 May 2020, the household refuse and recycling centres would be reopened. Social distancing measures would be put in place and guidance had been posted on the Council's website. It was recognised that residents may experience queuing at the centres initially and so the council would provide expected wait times when known. The Cabinet Member also confirmed that the bulky waste collection service was also being restarted and could be booked in advance.

Veolia staff were thanked for their hard work to continue to deliver services during this difficult time for frontline staff.

The Cabinet Member for Safer Croydon & Communities thanked and paid tribute to all council staff for their response to covid-19. The work of the Resilience team was highlighted as they had provided around the clock support to the council's response. Additionally, the Cabinet Member highlighted the work of the Family Justice Service which had increased service provision to be a seven day service. The Licensing team

continued to work to ensure premises which should have been closed during lockdown were closed.

Members were informed that the council continued to support communities and had sought to maximise help from the voluntary sector with the CVA coordinating requests for support and managing new volunteers. The Cabinet Member noted that everyone owed the voluntary sector a huge debt for their extensive response to the pandemic, including the expansion of food banks to provide a six day a week service. The council had established an emergency grant scheme to support the voluntary sector and whilst almost 30 organisations had received funding it had been oversubscribed and so more funding had been made available.

Whilst it was noted that violent crime had reduced, there were increasing concerns in relation to domestic violence and the Family Justice Centre had been working with the police to develop a safe spaces campaign with supermarkets and other venues.

The Cabinet Member for Families, Health & Social Care noted the incredible amount of work and partnership working between the health service and the council during this period. Discharges from hospital had aided recovery and had been possible due to the partnership working.

The council and CUH were congratulated for their work in successfully sourcing PPE during the crisis. It was stated that this success was not because of the government but had been achieved in spite of the government.

The work of care workers was particularly highlighted by the Cabinet Member, noting that they were often wrongly underappreciated and had continued to put themselves on the frontline despite concerns of a lack of PPE and a lack of testing.

The Cabinet Member for Children, Young People & Learning noted that schools had done a large amount of work during this period by not only ensuring schools were open for the children of frontline children but had also supported the most vulnerable children in the borough. Schools had continued to support families, and teachers, teaching assistants and nurseries were thanked for their tireless work to ensure young people were supported.

Members were informed that young people were being called to ensure they were supported and technology was being provided where required. It was recognised that more work was required to support access to technology and work would continue on this over the following months.

Vulnerable families were continuing to be supported by the council with social workers ensuring all children in need and children with protection plans were contacted. Members were advised that 90% of visits with

priority 1, priority 2 and priority 3 children had taken place in person and virtually.

The Cabinet Member for Finance & Resources stated that the pandemic had been a huge financial challenge for the council and despite the promises at the start of the crisis from the government only £19.9m had been received which was only a fraction of the amount the council had spent on responding to covid-19. Costs related to covid-19 included expenditure, lost income and budget savings not being realised. It was highlighted that to-date £400,000 had been spent on PPE and £500,000 had been spent on accommodation.

Members were informed that the council had worked closely with suppliers to ensure they were still able to deliver services, where appropriate. Sustainability payments had been provided to the care sector and providers had been paid four weeks in advance.

Business grants had been paid to local businesses to support them during the difficult period and council tax support had been extended. The Cabinet Member announced that new claimants for council tax support would receive £150 reduction and those residents which had seen a reduction in their wages would be able to apply for a reduction of £150 also. The council, it was stated, remained committed to supporting those impacted by covid-19.

The Cabinet Member paid tribute to the work of Croydon Digital Services which had enabled the council to have excellent working from home functionality, had developed new services such as a hotline for shielded residents and had launched a service update page which provided an overview of the status of council services.

The Cabinet Member for Economy & Jobs thanked officers who had been working to support businesses and residents during the lockdown. It was noted that covid-19 was first a health problem and then an economic problem.

The council was working with key stakeholders to ensure the council can support the local economy. Over 2,000 businesses had been contacted and almost £39m in business grants had been released. The Cabinet Member noted that a number of businesses had not applied for grants and so encouraged everyone to highlight the grant scheme to local businesses.

Croydon Works had been redeveloped and had been engaging with businesses across the borough with a particular focus on those sectors with increased vacancies. Croydon Works had facilitated vacancies being filled for a number of organisations including those outside the borough such as St Helier Hospital and St George's Hospital.

The Cabinet Member informed Members that a business survey had been launched which was hoped would enable the council to better understand how it could support local businesses. To further support the local economy, a business support website had been established and would be updated with further information.

The Cabinet Member for Culture, Leisure & Sport stated that work had initially taken place to close libraries and museums and work with partners to ensure they were in line with government guidance.

To support residents and the culture sector there had been an increased online presence which people were engaging with. New content was being released online and those producing it were thanked.

Whilst parks had been kept open, play areas had been closed in line with guidance and would remain closed following updated guidance. The Cabinet Member advised Members that the council remained in contact with Friends of Parks groups to keep them updated of the situation in their local areas.

Members were informed that a culture relief fund of £135,000 had been established to support the cultural sector and whilst the Cabinet Member noted that there were challenges, he looked forward to reintroducing services as and when it was safe to do so and looked forward to 2023 when Croydon would be the London Borough of Culture.

The Cabinet Member for Transport, Environment & Regeneration (non-voting – Job Share) stated that at the outset the council had put in place parking dispensations for NHS and key workers which was followed by the suspension of parking charges. The council had only issued fines for dangerous driving and traffic violations.

The council had introduced low traffic initiatives which had reflected use patterns and sought to promote greater adherence to 20mph speed limits, support social distancing and encourage walking and cycling. To further support cycling, the Cabinet Member stated that improvements to cycle routes would be introduced and included a London Road cycle route being introduced by the end of the month.

It was noted that public transport capacity would be significantly reduced with social distancing measures as such, across London, there would be a need to repurpose the roads to meet demands for walking and cycling and to support this work, the council would work with all interested parties to access the funding available for new transport schemes.

The Cabinet Member for Environment, Transport & Regeneration (voting – Job Share) thanked all the staff in planning and regeneration teams for their work during the period and for supporting the wider council's response. It was noted that the teams were looking to the future and to combating the housing crises as the pandemic had brought to light the

lack of decent homes. Work continued to develop the Local Plan which would ensure the delivery of those much needed homes.

Members noted that the planning team had maintained business as usual, where possible, and two remote Planning Committee meetings had been held to-date, which were meetings held in public.

The Cabinet Member noted that the regeneration team was working to develop recovery plans to assist the council in supporting regeneration of the area following the pandemic.

The Chair of the Health & Wellbeing Board noted that one initial concern had been the home delivery of medication to shielded residents and thanked the volunteers who had supported home deliveries to those residents. Work continued to ensure the vulnerable and shielded their medicines when they were due.

The localities work which had been undertaken by the council prior to the pandemic was stated to have been invaluable in the council's and NHS' response. Communities had also stepped forward and had worked with the council to provide services to vulnerable residents.

The Chair of the Health & Wellbeing Board noted that mental health would need to be a focus going forward as a number of people will have been adversely affected by the crises and it would be ongoing concern.

The disproportionate impact on BAME communities was highlighted by the Chair of the Health & Wellbeing Board and the work by CUH to gain a better understanding of this impact was welcomed. It was noted that there were concerns within these communities as it was recognised that the poorest residents would have no other choice but to use public transport and would face an increased risk of infection.

Members were informed that the Health & Wellbeing Board would look to develop strategies to support mental health and tackle health inequalities going forward.

The Leader of the Opposition thanked the NHS for their fantastic work and council staff who had worked to maintain services. He also highlighted the work of care workers which was very important but was often under appreciated. The work of the voluntary sector was also noted for its support to assist vulnerable residents during this time. Finally, the Leader of the Opposition stated that many residents were initially concerned that the kerbside waste collection service would be disrupted but due to the work of Veolia staff this had not been the case.

Whilst the opposition supported the council in its work to respond to the crises and support residents, it was stated that it was important that challenge remained. The Leader of the Opposition queried whether it was appropriate that Brick by Brick had submitted a number of contentious

planning applications a few days after lockdown had begun. It was suggested that the message from the council, in relation to this, was inappropriate as residents did not have an opportunity to meet to form a coherent objection to the applications. It was further suggested that lessons would need to be learnt following the pandemic on appropriate forms of intensification which did not increase transmission rates.

In response to the concerns raised, the Cabinet Member for Homes & Gateway Services stated that the engagement process for planning applications started long before the application was submitted and that for Brick by Brick applications, engagement had taken place prior to submission. In terms of the council's engagement period on planning applications, this had been extended by a week to enable residents greater opportunity to respond. Members were also informed that the Deputy Chair of the Planning Committee had referred all Brick by Brick applications to the Planning Committee to ensure they were fully considered.

The Cabinet Member for Homes & Gateway Services noted that the covid-19 crisis had increased the need for people to have their own home and not be in bedsits, or similar, and so it was important that the council did not obstruct the development of good quality homes in appropriate locations.

In response to concerns raised by Councillor Tim Pollard, the Leader noted that the meeting was the first meeting of Cabinet since the pandemic had begun and that it was important that the council gave a full presentation on the significant work which had been undertaken; however future meetings, it was stated, would be more traditional. The Leader further noted that members of the public could dip in and out of the webcast and that it was not a requirement to watch the entire meeting.

The Leader informed Members that there were a number of challenges facing local politicians and suggested that it may be pertinent to review options to devolve more powers and ensure best use of ward budgets. It was hoped that the Governance Review Panel would reflect on this and bring forward possible options. The Leader confirmed that he was confident that the political parties could work together in the future to ensure the council responded in the best manner.

Concerns were raised by Members of the Shadow Cabinet that the council had received £60m for business grants and that while the council had been advertising these grants there were a number of businesses which had not received the support. Members stated that some businesses had waited four to five weeks for grant payments which were urgently required and requested that these be paid urgently.

In response, the Cabinet Member for Finance & Resources confirmed that the council had spoken with other councils to get an understanding of best practice. Furthermore, it was stated that a number of officers had been

transferred to support the allocation of grants and were now undertaking doorstep visits to encourage applications. The Cabinet Member informed Members that difficulties had arisen due to MHCLG guidance changing several times over the period and it was necessary to undertake sufficient checks on a business to avoid the concern that MHCLG may demand monies returned if not correctly allocated. In relation to concerns raised in relation to six business grant applications submitted on 4 April, the Leader confirmed that an update would be provided to the councillor by the following day on the progress of processing those grant applications.

The Cabinet Member for Finance & Resources stated that the council was in conversation with tenants on the investment purchases and noted that there may be some need for flexibility however any short-term impact would not impact the long-term return of the investment.

Everyone involved in the continuation of education in the borough was thanked for their hard work and dedication, including social workers who had engaged with vulnerable children who were not attending school. Despite the work of all those involved, it was noted that education had been interrupted and would be impacted.

The Cabinet Member for Children, Young People & Learning informed Members that there had been a number of initiatives put in place to support the work of schools. Where children had not been able to access education via technology take-home packs had been provided and the sector was looking at the support which could be provided and supporting families to have access to the internet as a number of secondary schools were setting homework through online portals.

Opposition Members advised the meeting that they had phoned a number of care homes based in their wards and had found that a number of staff were concerned about the impact of the virus on care homes as there had been high numbers of deaths and cases. Members were advised that the council had been providing guidance to all care homes in the borough and had procured PPE for care home staff. The council had focussed on supporting care homes as it was recognised they were at high risk of infection and had not had the attention that the NHS had received nationally. It was stated that it was imperative that a national solution to adult social care was developed.

The Executive Director Health, Wellbeing and Adults expressed his condolences to everyone who had lost someone during this time and thanked families for their understanding when they had not been able to visit a loved one. The Executive Director noted that there were a number of homes being supported in the borough and not just those caring for the elderly but also those supporting residents with learning difficulties or mental health problems.

In response to questions the Cabinet Member for Environment, Transport & Regeneration (non-voting – Job Share) confirmed that the details of the specific roads included within the low traffic initiatives were published on the council's website and that notices had been placed in the affected areas. The webpage also gave the option to residents to suggest additional roads for low traffic schemes.

Members were informed that the council had used emergency powers to introduce the initiatives which lasted initially for 21 days and could be extended for a further 21 days. If the scheme was to be in place for longer then the council would need to implement a temporary traffic order. The Cabinet Member stated that the council wanted to engage with ward councillors who knew their areas best to support the implementation of the schemes.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED:

1. That the Council record its thanks for all the front line and support service staff that have continued to provide vital services across the borough;
2. That the Council record its thanks for the work of organisations, staff and volunteers across Croydon, including voluntary and community groups, who have enabled a strong coordinated response across Croydon and ensured vulnerable residents receive the support they need;
3. That the Cabinet note the report and the actions taken in response to the Covid-19 pandemic; and
4. That the Leader, Cabinet Member for Finance & Resources, Chief Executive and S151 Officer continue efforts to raise awareness of costs incurred by Croydon Council in responding to Covid-19, supporting residents, business and communities, and the need for further funding from central government.

30/20

Outcome of the Ofsted Inspection of Early Help and Children's Social Care

The Cabinet Member for Children, Young People & Learning thanked all involved in the council's journey to being rated 'Good' by Ofsted inspectors and highlighted to work of Rob Henderson, Nick Pendry and previous directors, Martin Pratt at Camden Council and the work of the Safeguarding, Scrutiny Committees, Deputy Cabinet Member and Shadow Cabinet Members.

Members were advised that Ofsted had made four judgements which were outlined at paragraph 3.2 of the report. It was noted that Ofsted inspectors had seen a great transformation of the service to support children in need of help and protection which was enabling the council to meet the needs of individuals. Concerns in relation the Single Point of Contact had been addressed quickly so there was only one “front door” and the voice of the child was heard. Members were also advised that promising conversations were taking place to further enhance opportunities for children and families to access services and ensure meaningful work was taking place at the right time.

In terms of children in care and care leavers, the initial inspection in 2017 had found serious concerns and since then progress had been made to ensure social workers were committed, knowledgeable and knew their children well and understood the importance of permanence. It was noted that Croydon had a large cohort of unaccompanied asylum-seeking children UASC, with over 350 UASC at any one time, and these children were benefiting from the effective multi-agency work taking place. Members were informed that work continued in this area as the council continued its journey to achieve ‘outstanding’.

The Cabinet Member informed Members that services to support children with disabilities had undergone a dramatic transformation with staff being well supported. Furthermore, significant work had gone into supporting children with disabilities during the covid-19 pandemic. The Cabinet Member thanked Mike Brown for his work in transforming this service.

It was noted by the Cabinet Member that more work was required to maximise the stability of placements so children can have their ‘forever home’ at any earlier stage. The council remained committed to supporting UASC despite the continued underfunding by the Home Office and the Ofsted report acknowledged this work.

The impact of strong corporate and political leadership had been noted by inspectors and the Cabinet Member stated that the council’s financial commitment to deliver changes in the service could not be underestimated and thanked the Cabinet Member for Finance & Resources for their support on the improvement journey.

Cabinet noted that Ofsted had made four recommendations which included the need for improved quality of written plans for young people. Whilst it was recognised that social workers knew their children and their needs well this had not always been fully recorded and it was important that records were completed. Additionally, a recommendation had focussed on supporting care leavers to find accommodation and the Cabinet Member noted the council’s commitment to support care leavers with housing and council tax support.

The Leader of the Council reiterated the thanks for the Cabinet Member of all involved who had been committed to improving children's social care in the borough.

The Executive Director Children, Families & Education stated that he was very proud of the work of all involved and noted that the outcome was the best that the council have hoped for in a short period of time. It was noted that Ofsted had seen real action and pace of change in addition to the passion and commitment of the skilled workforce. The practitioners, families, Members, transformation board and the council were thanked for their support to achieve the transformation of the service.

The Shadow Cabinet Member congratulated all involved in the improvement journey and highlighted the work of staff. It was noted that the financial commitment of the council and the appointments of Rob Henderson and Nick Pendry had supported the improvements made in addition to the virtual school and improved partnership working.

Whilst it was recognised that the council had improved services for children and young people there was still some way to go and that it was important that the council remained focussed on making progress with the four recommendations from Ofsted.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To note the findings from the re-inspection of Croydon's Early Help and Children's Social Care Services by Ofsted which concluded on 14th February 2020 and was published on Ofsted's website on 16th March 2020.

31/20

Children, Young People & Families Plan

Due to time constraints during the meeting, the Leader requested that this report be taken to the next meeting of Cabinet to enable a full discussion of the Plan.

The Leader of the Council delegated authority to the Cabinet to make the following decision:

RESOLVED: To take the report to the next meeting of Cabinet for discussion.

32/20

Report on Consultation on proposals to renew the private sector housing Selective Licensing Scheme in Croydon

The Cabinet Member for Homes & Gateway Services informed Members that the council had launched the first Selective Licensing Scheme in Croydon in 2015 which sought to ensure private rented homes met

required standards. The scheme covered over 36,000 properties in the borough.

Through the scheme, the council had taken action against non-compliance however it was noted that most landlords took corrective action where required and that it had not been necessary to take many to court. Although, Members were informed that over 70 landlords had been banned following contraventions.

Given the impact of the current scheme, the Cabinet Member stated it was imperative to renew the scheme to ensure private renters in the borough had good quality homes. The council had completed 12 weeks of consultation of the proposed new scheme through a variety of means including residents' surveys and stakeholder group meetings. The outcome of the consultation found that 64% of residents felt that the current scheme had been effective and that 70% of Croydon residents were in favour of the council continuing with some form of Selective Licensing.

The Cabinet Member highlighted that the report sought Cabinet's approval to proceed the preferred option, option 3 of the report, which sought two designations within the borough with a proposed implementation date, subject to Secretary of State Approval, being 1 February 2021.

The proposed option included the two designations; designation A covered 92.5% of the borough's privately rented sector and focussed on poor housing conditions whilst designation B covered 7.5% of the private rented sector and sought to focus on problems of persistent anti-social behaviour.

Cabinet was informed that the objectives of the scheme included full compliance with all licensable dwellings being licensed, improved property conditions, reduction in anti-social behaviour incidents, improved professionalism of private landlords and an increased focus on the health and wellbeing of tenants and their families.

In terms of the licensing fee, the Cabinet Member informed Members that it was proposed that the fee would be payable in two stages and would amount to £750 for a single dwelling which it was noted to be favourable in comparison to other councils' licensing schemes.

The Cabinet Member concluded by thanking Shayne Coulter who had recently retired and had been instrumental in introducing the first scheme and at the initial stages of the proposed scheme. It was noted that Shayne had been dedicated to improving the standard of housing in the borough and the council wished her well for the future.

The Shadow Deputy Leader noted that the Opposition did not object to the principle of the scheme as they also wanted to see poor landlords

removed from the private rented market; however noted that it was felt that the proposed scheme appeared contrived and concerns were raised that the evidence base was not complete as an area highlighted as suffering from persistent anti-social behaviour included a woodland area.

In response to the concerns raised, the Cabinet Member stated that a large amount of work had gone into developing the proposed scheme including working with barristers, other boroughs and undertaking extensive consultation to ensure the proposal was appropriate. It was, however, noted that there was only guidance on Selective Licensing Schemes and so it was not clear what the Secretary of State's comments may be.

The Cabinet Member stated that the anti-social behaviour incidents highlighted in the map related to specific properties and not to the general area.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To

1. Consider the outcome of the consultation process detailed in the Consultation Report produced by Opinion Research Services (April 2020) (at Appendix 1 of the report), in particular the representations received and the Council's consideration of, and response to, these representations (at Appendix 2 of the report).
2. Consider the Consultation Evidence Report (at Appendix 3 of the report) which highlights the scale of problems relating to poor housing conditions and anti-social behaviour (ASB) in the private rented sector, identifies the objectives that a selective licensing designation would help the Council achieve and possible alternatives to such a designation and the equalities analysis at Appendix 13 of the report.
3. Upon consideration of the matters at 1 and 2, agree to choose selective licensing scheme option 3; from the three options presented at Cabinet on the 21st October 2019 that were central to the public consultation exercise and with due consideration of the alternative options presented; as the best option to proceed with, with the aim of achieving the significant improvements needed to the private rented sector in Croydon.
4. Upon consideration of the matters at 1, 2 and the agreement in 3 and using its powers under s.80 Housing Act 2004, agree to the designation of 22 wards, called area A (predominately in north Croydon), as a selective licensing area delineated and edged red and infilled green on the map at Appendix 4 of the report.

5. Upon consideration of the matters at 1, 2 and the agreement in 3 and using its powers under s.80 Housing Act 2004, agree to the designation of 6 wards, called area B (in south Croydon) as a selective licensing area as delineated and edged red and infilled orange on the map at Appendix 5 of the report.
6. Having agreed 4 and 5 that Cabinet delegate to the Executive Director Place, in consultation with the Cabinet Member for Homes & Gateway Services and the Director of Law and Governance, responsibility for agreeing the final document/s forming the application(s) to request confirmation of the selective licensing designation(s) from the Ministry of Housing, Communities and Local Government (MHCLG);
7. Having agreed 4 and 5 and where the appropriate national authority (Secretary of State for Housing, Communities and Local Government) confirms one or both designation(s) that Cabinet:
 - a. Delegate authority to the Executive Director Place, in consultation with the Cabinet Member for Homes & Gateway Services to agree, along with the national authority, that the respective commencement date(s) for the designation(s) be the 1st February 2021 or from such other date as is specified by the national authority for this purpose;
 - b. Agree the proposed scheme objectives as detailed in Appendix 6 of the report;
 - c. Agree to the proposed fee structure for licence applications made under the selective licensing scheme(s) at Appendix 7 of the report;
 - d. Agree the proposed licence conditions that would apply to any granted selective licence as set out at Appendix 8 of the report;
 - e. Agree the proposed policy regarding the granting of property licences under any new licensing designation(s) at Appendix 11 of the report;
 - f. Delegate to the Executive Director Place in consultation with the Cabinet Member for Homes & Gateway Services authority to agree changes to the proposed implementation of the schemes where necessary including updating scheme documentation to reflect revised commencement date/s specified by the national authority for this purpose and to ensure that all statutory notifications are carried out in the prescribed manner for the designations and to take all

necessary steps to provide for the operational delivery of any licensing schemes agreed by Cabinet.

33/20

Stage 1: Recommendations arising from Scrutiny

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To receive the recommendations arising from the Streets, Environment & Homes Sub-Committee (4 February 2020), Scrutiny & Overview Committee (25 February 2020) and the Health & Social Care Sub-Committee (10 March 2020), and to provide a substantive response within two months (i.e. at the next available Cabinet meeting on 13 July 2020).

34/20

Stage 2 Response to Recommendations arising from Scrutiny & Overview Committee on 29 October 2019, Children & Young People Scrutiny Sub-Committee on 5 November 2019 and Streets, Environment & Homes Scrutiny Sub-Committee on 17 December 2019

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To approve the response and action plans attached to this report at Appendix A and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

35/20

Investing in our Borough

The Cabinet Member for Finance & Resources informed Members that the report detailed important contracts which had been negotiated and awarded during the covid-19 pandemic. Additionally, it was noted, that the council had acquired further property which had been required to support residents during this period.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To approve

1. The procurement strategy which will result in contract awards for the provision of ANPR solution, and Parking ICT Case Management system for a maximum term of 10 years as set out at agenda item 11a.

RESOLVED: To recommend

2. To the Leader of the Council, that in respect of decisions requiring Cabinet's approval, or prior reporting to Cabinet, concerning the

acquisition or disposal of property, procurement strategies and contract awards and variations, where due to the challenges created by Covid 19 a decision cannot reasonably await the decision of Cabinet:

- a. The Cabinet Member for Finance and Resources in consultation with the Leader, be authorised to agree such decisions concerning the disposal or acquisition of properties;
- b. The nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated member is the Cabinet Member for Finance and Resources in consultation with the Leader, be authorised to agree such decisions concerning the award and/or variation of contracts;
- c. Note that any awards made under these delegations will be notified in the standard contracts report to the next meeting of Cabinet following the decision being made.

RESOLVED: To note

3. The list of delegated award decisions for contracts over £5,000,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet, as set out in section 4.2.1 of the report.
4. The contracts between £500,000 and £5,000,000 anticipated to be awarded by the nominated Cabinet Member, in consultation with the nominated Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader, as set out in section 4.1.2 of the report.
5. The list of delegated award decisions made by the Director of Commissioning and Procurement, between 18/03/2020 – 17/04/2020, as set out in section 4.2.3 of the report.
6. The delegation agreed by the Leader in respect of the purchase of properties in relation to the HRA, and the delegated decisions made by the Cabinet Member for Homes & Gateway Services, in consultation with the Cabinet Member for Finance & Resources to approve the purchase of properties in relation to the HRA, as set out in section 4.3.1 of the report.

7. Property acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet, as set out in section 4.3.2 of the report.

a **Parking ICT Case Management System & ANPR Cameras Procurement**

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To approve the procurement strategy for the Parking ICT Case Management System & ANPR Cameras Procurement with the following recommendation:

Procure the Parking ICT Case Management system with an estimated value of £1.5 million and the provision of an ANPR solution, providing hardware, software and support, with an estimated value of £8.9 million for a 10 year term. The procurement will use an EU Open tender process consisting of two lots: Lot 1, provision of a Parking ICT system, hosting, support and maintenance & Lot 2, provision of ANPR cameras, back end IT system to manage and control the camera network and images, associated support and maintenance and hosting of the camera management system.

36/20

Exclusion of the Press and Public

This item was not required.

37/20

Minutes of the previous meeting

The part B minutes of the Cabinet meeting held on 24 February 2020 were agreed.

The meeting ended at 9.25 pm

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For General Release

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| REPORT TO: | CABINET: 8 JUNE 2020 |
| SUBJECT: | Croydon Together: Update on our ongoing response to Covid-19 |
| LEAD OFFICER: | Jo Negrini, Chief Executive |
| CABINET MEMBERS: | Councillor Tony Newman, Leader of the Council and all Cabinet Members |
| WARDS: | All |
| <p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: Covid-19 has had an unprecedented impact on a global scale, including the UK and Croydon. Our response has been wide ranging, as will the recovery, covering all aspects of the Corporate Plan, including:</p> <ul style="list-style-type: none"> • People live long, healthy, happy and independent lives: through our public health messaging, adult social care and support for vulnerable residents • Our children and young people thrive and reach their full potential: through our support for schools and families, particularly the most vulnerable • Business moves here and invests, our existing businesses grow: by paying government grants and support with business rates | |
| <p>FINANCIAL IMPACT: Whilst this report is for information, and therefore does not have any direct financial impact, it is clear that Covid-19 will have a significant impact on both the Council's financial position, as well as the financial position of residents and businesses across the borough.</p> | |
| <p>KEY DECISION REFERENCE NO.: N/A</p> | |
| <p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> | |
| <p>1. RECOMMENDATIONS</p> <p>1.1 That the Cabinet note the report and the actions taken in response to the Covid-19 pandemic</p> | |

2. EXECUTIVE SUMMARY

- 2.1 This report follows a comprehensive report to Cabinet on 11 May, detailing the impact that the Covid-19 pandemic was having in Croydon, and how the Council and our partners were responding to support residents and businesses across the borough.
- 2.2 The impact is far reaching. There has been over 250,000 cases of Covid-19 in the UK, and over 35,000 fatalities. This is a significant increase since the

previous report, but the data suggests the country has 'passed the peak', with the number of new infections reducing.

- 2.3 As well as the immediate response to the pandemic, the Council has been preparing for the recovery phase and how services and facilities will operate after the lockdown is lifted. The impact of Covid-19 will be felt for the next 18-24 months, with social distancing and other measures required until a vaccine is developed.
- 2.4 The Government has published a roadmap for lifting the lockdown restrictions, as well as revised guidance to support individuals and organisations as they seek to stay safe. This is informing our planning for each phase of the Government roadmap.
- 2.5 All organisations, including the Council, have been required to rapidly redesign the way they deliver goods and services whilst maintaining physical (social) distancing, for the protection of both users and staff. The Council has worked with partners to support residents, particularly the most vulnerable, prioritising key services and redeploying resources to provide support where it is most needed. As the lockdown lifts, a wider range of services need to be redesigned to operate within social distancing guidelines.

3. BACKGROUND

- 3.1 At the Cabinet meeting on 11 May 2020, a report was received providing an update on the Council's response to the Covid-19 virus. The report provided background information on the pandemic, including the latest information on infections across the UK and locally in Croydon.
- 3.2 The report confirmed that as a communicable disease, without any vaccine or scientific intervention, the immediate impact of Covid-19 will be felt for the next 18-24 months.
- 3.3 The Council has been working with partners to develop our renewal and recovery plans that balance the impact of ongoing protective measures and social distancing with the need to reopen services and support residents and businesses.
- 3.4 Whilst this report provides updated information regarding the response to Covid-19, the majority of the report is focused on the activities to support residents, businesses and staff as the lockdown is lifted. In particular, information is given regarding the plans for council services which will continue to be impacted for to ongoing measures to protect staff and service users from Covid-19.
- 3.5 Since the previous Cabinet report the national data would suggest that the country has indeed passed the 'peak' of the pandemic, with infection levels and deaths reducing consistently.
- 3.6 As at 5pm on 18 May, the number of confirmed Covid-19 cases in Croydon was 1,485, compared to 1,388 cases on 3 May (the data included in the last Cabinet report). This shows an increase of 97 new infections.

3.7 As at 5pm on 18 May, the number of confirmed Covid-19 deaths at Croydon University Hospital was 295, compared to 259 on 3 May (the data included in the last Cabinet report).

4. CROYDON RESPONSE - UPDATE

- 4.1 This section of the report provides brief updates on the key elements of the Croydon response. The response continues Croydon Council and partners within the Local Strategic Partnership (which is chaired by the Leader of the Council), have worked together to respond to the impact of Covid-19 in Croydon.
- 4.2 The Council's emergency response structure remain in place, including Gold and Coordination and Contingency Planning groups. The Borough Emergency Control Centre continues to support these structures, collecting, collating and disseminating information to support quick and informed decisions and to / from London structures. Dashboards are produced on a daily basis within the latest information across a range of indicators.
- 4.3 The Leader of the Council has continued to chair weekly meetings of the Local Strategic Partnership. These meetings have been critical in coordinating the response across partner organisations, enabling frequent and honest communications and collaboration to tackle the challenges faced across Croydon.
- 4.4 The Council's cabinet has been meeting informally regularly throughout the pandemic. Cabinet Members continue to work closely with their relevant officers to inform the Council's response and plan for future recovery.

Care homes

- 4.5 There has been national coverage regarding the number of Covid-19 infections and deaths within care homes. As Croydon has more care homes than any other part of London, this has been a key area of focus for our response.
- 4.6 The Council has enacted our Care Home System Response Plan, which includes enhanced hospital discharge arrangements, PPE supply, and advanced payment to support cash flow.
- 4.7 Gold has received daily updates on the demand for beds, the capacity within the sector and the impact of Covid-19 on care homes. The number of care homes with residents displaying Covid-19 symptoms has reduced since the previous report, as has the overall number of care home residents displaying symptoms. Regrettably, there have been 147 Covid-19 deaths within Croydon care homes (as of 18 May).

Shielding and vulnerable residents

- 4.8 On 11 May, the Government published revised guidance (stay alert, stay safe). This guidance, however, confirmed that shielded residents (as identified by NHS and GPs due to pre-existing health conditions) need to continue to stay

safe by staying at home. Other people that are particularly vulnerable should continue to take care to minimise contact with others outside their household.

- 4.9 As of 18 May, there were 14,054 shielded residents in Croydon, of whom 2,800 needed support to get basic supplies as they do not have friends/family nearby to undertake tasks for them. The Government has organised food parcels for these residents (6,261 as of 18 May), but the Council is providing interim and additional support, including 1,552 essential supplies parcels.
- 4.10 Our Gateway services continue to respond to an increase in requests for emergency funding for residents needing food, amenities, rent and other essentials, as well as increased demand for welfare rights advice, debt management and free school meals support, and increased support for destitute residents who have no recourse to public funds (NRPF).
- 4.11 The Council established a quick and simple online form for any resident wishing to defer their Council Tax payments for 2 months. 3,583 residents applied for this deferral.

Voluntary and Community Sector support

- 4.12 As set out above, Covid-19 has created a significant increase in vulnerable residents for a variety of reasons. Many of these residents have turned to the voluntary and community sector, and the council is working closely with the sector to provide support to the most vulnerable residents.
- 4.13 Many voluntary and community groups have responded to the pandemic and offered new services, or redesigned services to continue supporting vulnerable residents during the lock down.
- 4.14 Advice and guidance has been provided through a weekly webinar for VCS groups across Croydon as well as regular communication between the Council and the VCS infrastructure organisations.
- 4.15 The Council established a new fund titled 'Croydon's VCS Covid-19 Emergency Fund' to support VCS groups that are responding directly to Covid-19 in Croydon. As of 15 May 2020, 71 bids had been received for the Covid-19 emergency fund. Of these:
- 36 bids had been approved, totalling £185,951
 - 34 bids had been declined, totalling £224,219
 - 1 bid was under consideration, or further information was being sought, totalling £6,801
- 4.16 As the pandemic has progressed, so has the focus of the fund – with a shift from short term issues such as food provision to medium term issues such as mental health, domestic violence and social isolation.

Business and supplier support

- 4.17 Covid-19 has had a devastating impact on the local economy. It is clear that the virus will lead to a global recession. Croydon is a major business centre, and the impact on the local economy will therefore be significant.

4.18 Croydon has been allocated £60.6m to support businesses with grants of £10k or £25k payable, based on business rate values. Businesses need to complete a simple application process. £42.06m has been paid to 3,101 Croydon businesses as of 18 May. This equates to 69.4% of the business grant budget. 3,101 businesses paid are 74% of all 4,218 eligible businesses in Croydon. The Council continues to contact all businesses to ensure they are aware of this funding and to support them through the simple verification process and make payments as quickly as possible.

5. GOVERNMENT GUIDANCE AND ROADMAP

5.1 As set out in the previous section, the Council and our partners continue to support residents and businesses in responding to Covid-19. On 11 May, the Government published revised guidance and a roadmap for removing the lockdown restrictions.

5.2 The Government roadmap set out a three phased approach:

- Phase 1 sought to contain, delay, research and mitigate.
- Phase 2: smarter controls, replacing existing social restrictions with smarter measures to control the epidemic, developed and announced in periodic 'steps' over the coming weeks and months
- Phase 3: reliable treatment (eradication is unlikely)

5.3 We are currently in phase 2. It is important to note that throughout this phase, people will still need to minimise the spread through good hygiene, social distancing and regular disinfecting of surfaces. The roadmap sets out the need for public and work spaces to be redesigned to make any social contact safer, including track and trace monitoring.

5.4 There are 3 steps within phase 2 with gaps between steps of several weeks, to allow monitoring.

- Step 1: exercise more than once a day, outdoor public places open
- Step 2: phased return for primary schools, non-essential retail
- Step 3: places of worship, leisure facilities, hospitality

The precise timetable will depend on the infection risk at each point and effectiveness of mitigation measures.

5.5 Step 1 was implemented from Wednesday 13 May. This encouraged businesses to open (unless they were required to close) and for people to go to work if they were unable to work from home. Advice was changed to recommend that people wear face coverings when in enclosed spaces where social distancing is not always possible (e.g. on public transport) to protect against transmission.

5.6 In order to avoid crowds in urban parks, the revised guidance confirmed that people could drive to public spaces, irrespective of distance. Unlimited exercise was permitted, as was spending time outside for leisure. People are also allowed to meet with one person from outside their household, provided social distancing is maintained. Playgrounds, outdoor gyms and ticketed outdoor leisure venues must remain closed in step 1.

- 5.7 The Director of Public Health for Croydon has advised that this is a very dangerous phase within the pandemic. It is critical that people do not become complacent and that social distancing and good hygiene are maintained.
- 5.8 Step 2 will be implemented no earlier than 1 June. This step includes
- the phased return for early years settings and schools. Further details are set out below regarding the implications and planning to support this in Croydon.
 - the phased opening of non-essential retail and where social distancing can be maintained.
 - Reopening more local public transport
- 5.9 Step 3 will be implemented no earlier than 4 July. The Government's ambition at this step is to open at least some of the remaining businesses and premises that have been required to close, including personal care (such as hairdressers and beauty salons) hospitality (such as food service providers, pubs and accommodation), public places (such as places of worship) and leisure facilities (like cinemas). Government guidelines will need to be met and where social distancing may prove difficult, some venues will remain closed. The Government will phase and pilot re-openings to test their ability to adopt guidelines.
- 5.10 The roadmap and guidance documents are clear that this is not a short-term crisis. Covid-19 will circulate in the human population long term, possibly causing periodic epidemics. Large epidemic waves cannot be excluded without continuing some measures. There is no easy or quick solution. Only a vaccine or effective drugs can reliably control this epidemic and reduce mortality without some form of social distancing/contact tracing.

6. REOPENING CROYDON

- 6.1 As set out in the Cabinet report on 11 May, the Council has been developing plans for how and when to reopen services and facilities for residents and businesses. This work is being coordinated with partners to ensure that a consistent approach is undertaken and public health messages remain clear and easy for everyone to follow. Decisions on when to open services and facilities is also being coordinated across London.
- 6.2 The Council has been developing a recovery strategy for its services, and linking this with the actions of our partners to ensure a connected and coordinated approach to providing services and support to our residents and businesses. The Croydon Together approach will focus on 4 key areas of work:
- Continued support for vulnerable residents: as set out above, many residents will need to continue shielding, with other vulnerable residents needing to take particular care. As well as essential supplies, support such as mental health and befriending services will be needed.
 - Environment and sustainability, focused on short/medium term improvements: creating a sustainable Croydon is not new ambition, and in the renewal and recovery phase we need to ensure that this remains a central aspect to support quality of life

- Economic recovery and support for businesses: the impact on businesses will last beyond a lockdown. A separate report on our approach is elsewhere on the agenda.
- Building on the strong local community structures that have provided support to residents: ensuring that our activities are coordinated with the community activities that have developed, and linked with our approach for prevention and early intervention at a locality level.

6.3 The approach will not be about restoring services to an 'as was' arrangement. All services need to adapt to new demands and new operational requirements. Where services have needed to adapt quickly, we need to ensure that these adaptations are suitable for the medium term. Where services have closed due to the pandemic, we need to consider if and when they can be restored safely, whilst still maintaining capacity to support priority 1 services at all times.

6.4 Services will continue to adjust and change as they respond to the needs of residents and businesses in a very different environment. The use of remote technology has been adopted rapidly and widely in response to the Covid-19 pandemic, and the council will be identifying how this can support efficient and effective service delivery.

Workforce and buildings

6.5 Government guidance has been issued for all employers to ensure that workplaces are as safe as possible. At the time of writing, the advice continues to be that if staff can work from home they should. Croydon council, and many of our partners, have implemented this very successfully. Our digital platforms enable staff to access the council's IT network from home, and we have provided MS Teams on all laptops to support virtual meetings and working. Training was offered to all staff to support this.

6.6 As set out above, however, this did require some services to adapt or to stop. This ensured that we were able to continue to providing priority 1 services. As we restart some of these services, even with continued changes to how they are delivered, more of our staff will be required to be physically at work in one of the Councils buildings.

6.7 The Government guidance is clear that workplaces will need to be adapted to support social distancing. As an example, in order to maintain social distancing within Bernard Wetherill House we can only support approximately 30% of the normal staffing levels. Continued changes to the way we work will therefore be required.

6.8 A task and finish group is coordinating work in this area, matching service and building requirements. An assessment of essential physical office requirements has been completed for each service. This has been on the basis that:

- We should keep the agile service delivery that has been enabled
- We should keep digital by default for public access/contact
- We blend short touch-down space with required presence in the building

6.9 Each building across the Council's estate has been reviewed to assess its suitability for staff to work within based on social distancing guidance. The suitability for each site was also based on elements such as desk spaces, Wi-

Fi, DDA compliance, parking, bike storage and food/catering. The buildings were then given a red / amber / green rating:

- Green are deemed as suitable for staff and should be opened as part of Phase 1.
- Amber are deemed as suitable but would recommend these are opened as part of Phase 2.
- Red are deemed as not suitable.

- 6.10 All services are being asked to consider options that support social distancing requirements, including 7 day working week, shift working and staggered start and finish times. These actions also offer flexibility for staff that may continue to have caring responsibilities.
- 6.11 Draft plans have been developed for each directorate to support service planning. The Council's first priority is to ensure that all staff can continue to operate in a safe environment. Priority for office space will then be based on the essential category of each service, where it is necessary for them to be in an office. Consideration will also be given to staff who cannot work from home for personal or other reasons.
- 6.12 Throughout the pandemic we have introduced enhanced cleaning standards across our buildings, and ensured there are supplies of essential items such as cleaning wipes and anti-bacterial gel. Additional PPE has been ordered in advance of more staff working in the building.

Schools

- 6.13 The Government announced that all schools were required to close after Friday 20 March for most students. This measure was introduced as part of the lockdown in order to reduce the risk of transmission.
- 6.14 Schools remained open only for selected students:
- Children of key workers
 - Children which are vulnerable
 - Children that have an Educational Health care Plan
 - Children with a social worker
- 6.15 The Council has worked to support all schools to operate safely during very difficult circumstances, providing for these students whilst following government guidance and maintaining social distancing. Schools have also had to ensure safe staffing levels, supporting staff that are vulnerable / shielded, show symptoms or have caring responsibilities. Daily reports are provided by each school confirming student and staff numbers each day.
- 6.16 On 20 May, ninety three schools were open across Croydon, with 1,151 children attending. This number has grown steadily since the start of the lockdown. Schools that have been unable to open have been supported to create a hub model with other schools.
- 6.17 Schools continue to support students not attending school through remote and home learning. This required schools and teachers to rapidly respond to the lockdown and produce home learning packs, introduce online lessons and digital classrooms and establish safeguarding arrangements.

- 6.18 As set out earlier in the report, the Government roadmap announced plans for a phased reopening of schools from 1 June at the earliest. The roadmap set out plans for:
- Reception, Year 1 and Year 6 children to be back in school in smaller sizes, so that youngest children and those preparing for transition to secondary school have maximum time with their teachers
 - Secondary schools and FE colleges to prepare to begin some face to face contact with Year 10 and Year 12 pupils who have key exams next year, in support of their continued remote, home learning.
- 6.19 The Government has also stated that the ambition is for all primary children to return to school before the summer, if feasible.
- 6.20 The Council has been working with schools to support their preparations for welcoming back students. A schools reopening working group has been established with a group of 8 school leaders across the range of schools. Locality meetings with smaller groups of primary leaders took place in mid-May.
- 6.21 A guidance paper has been developed and shared with schools. This included a checklist with key questions to support leaders with completing risk assessments. The Education directorate have set out a clear support offer for schools over the coming weeks and months.
- 6.22 Consultative meetings have also been held with all primary, infant and junior leaders based on locality. Meetings have also been held with professional associations and Trade Unions to share concerns and raise any key questions. The Council has shared concerns with the Regional Schools Commissioner.

Economic renewal

- 6.23 It is clear that the pandemic has had a devastating impact on the economy. Businesses have faced cash flow challenges and closure due to lock down.
- 6.24 The Government roadmap is clear that businesses should open, unless specifically required to close. The roadmap sets out plans for the phased reopening of the retail sector, followed by the leisure sector.
- 6.25 However, social distancing requirements means that even as these sectors reopen, they will not be returning to how things were before Covid-19. Consumer behaviour will continue to be impacted.
- 6.26 The Council and key partners have established a Sustainable Croydon Economic Renewal Board. This will take a cross-disciplinary approach to foster and support an economic renewal that will result in a more equal, inclusive and environmentally sustainable local economy. It will cross both the public and private sector and in collaboration with the Croydon Sustainable Commission, to ensure that sustainability is at the heart of the economic renewal. Full details are set out in a separate agenda item to Cabinet.

Rough sleeping

- 6.27 As part of the safeguarding arrangements during the lockdown, the Council worked with partners across London to provide accommodation for all rough sleepers. 160 rough sleepers were accommodated within Croydon. Of these, 89 were Croydon verified rough sleepers. Between 18 and 20 rough sleepers in Croydon refused accommodation support.
- 6.28 A number of additional accommodation units were procured to support this activity. This will not be sustainable after the lockdown lifts and the Council has been working with London partners to develop an exit strategy.
- 6.29 This will seek to ensure that those who have been laced in emergency accommodation in response to Covid-19 are not asked to leave the accommodation without an ongoing offer of support to end their rough sleeping.
- 6.30 This exit strategy will need to take into consideration accommodation capacity that is potentially put under pressure by the need to rehouse other cohorts. The Council has a strong partnership with the national homelessness charity, Crisis. They have given in principle agreement to support this strategy with tenancy sustainment and start up packs.

Parking enforcement

- 6.31 On 24 March, London Councils issued guidance to all councils (reported in national media) that enforcement should focus on obstructive and unsafe parking, while relaxing the enforcement of bay contraventions. They recommended that the civil enforcement officers should move on illegally parked cars and not necessarily issue a penalty charge notice.
- 6.32 It is recognised parking and traffic management is an important public service, which provides benefits for pedestrians, cyclists, motorists and the wider community. Those benefits include maintaining road safety and access to jobs, goods and services.
- 6.33 Transport is one of the most important factors in ensuring we continue to control the virus and save lives, whilst enabling a phased reintroduction of previously relaxed traffic / parking management and enforcement is therefore necessary to help manage a safe and controlled recovery. As people try to avoid public transport, demand on parking will increase and the reintroduction of charges and enforcement will be necessary to ensure priority can be maintained for those who need it most.
- 6.34 The Croydon Streetspace programme is the combined effort on social distancing, pop up cycle lanes, widened footways and road closures. The table below provides further information on our parking service restart plan:

| | |
|--------|--|
| 26 May | Processing of parking permit applications and parking charges restart. |
| 1 June | Subject to schools restarting from this date, CCTV parking enforcement of schools will start issuing warning notices |
| 8 June | Start with issuing warning notices for on street in bay contraventions |

| | |
|---------|---|
| | <p>Full CCTV enforcement restarts, School Streets to help reduce school run traffic and establish enforcement to protect social distancing</p> <p>Ongoing issuance of PCN for yellow lines and dangerous offences with proactive enforcement.</p> |
| 22 June | <p>Restart of enforcement in parking permit bays – subject to any new and contradictory guidance from London Councils or the government.</p> <p>Plus any backlog in processing of permit, in these case for expired permits will be temporarily not enforced.</p> <p>All other residents will be requested to P&D</p> |

- 6.35 The current advice from London Councils is that local authority parking enforcement teams should not issue Penalty Charge Notices to citizens using Blue Badges where an expiry date of the 1st January 2020 onwards. This will continue until guidance changes.
- 6.36 The Government’s free parking concession and supporting parking pass scheme for the NHS and health and social care staff and NHS COVID 19 volunteers (critical care workers) will continue to operate until government advises of its withdrawal.

Track and trace

- 6.37 A key element of the Government roadmap is to have more sophisticated virus monitoring systems. A track and trace system will enable more specific controls for people that have contact with anyone that develops the virus.
- 6.38 Track and trace are vital components of any strategy to manage the spread of infections at community level. It is a tried and tested method used by Local Authorities with Public Health England over many years to tackle communicable disease, and has been a critical component of the effective management of Covid-19 in other countries.
- 6.39 Track and trace systems are being developed and piloted by Government, with phone and app based elements. The Director of Public Health is supporting this activity with London wide coordination in place.
- 6.40 In the instance an outbreak is identified, the model will mobilise a co-ordinated regional and local response. In a local outbreak of a notifiable disease the Local Authority Director of Public Health will be expected to undertake a key-role in containing an outbreak in a key-complex setting (e.g. sheltered housing, care-home, school, key business, public service setting), enabled and supported by regional resources.
- 6.41 The position of the national tracing model is very dynamic, with core elements of the model being developed, designed and iterated on a daily basis.

Personal Protective Equipment (PPE)

- 6.42 Our dedicated PPE team has continued to coordinate orders, secure supplies and distribute stock. The team are also responding to enquiries, offers of help

(e.g. from local businesses) and requests for emergency supplies from providers.

- 6.43 The Council has maintained sufficient supplies for council staff and at no stage has services been impacted by a lack of PPE. In addition, and where required, emergency PPE supplies have been provided to suppliers (including Care Homes, Home Care), particularly in adult services.
- 6.44 As set out earlier, the Council has also secured additional supplies to support staff as we reopen services and buildings.

Parks and open spaces

- 6.45 We recognise the importance of people having access to outdoor spaces during the pandemic and our parks and open spaces have remained open across the borough. Playgrounds have been closed and outdoor gyms were not permitted to be used as part of lock down measures.
- 6.46 This has been supported by communications messages reminding everyone of the importance of maintaining social distancing within parks and open spaces. The Council has no enforcement powers in relation to the lockdown, so we continue to work with police colleagues where concerns are reported.
- 6.47 The revised guidance issued by the Government on 11 May included changes to some aspects of outdoor spaces. People are now permitted to drive to outdoor spaces, regardless of distance, and some outdoor facilities were permitted to be used.
- 6.48 In response to this the Council has reopened park car parks to their pre Covid-19 schedule. Tennis courts have been reopened with additional signage to remind people of social distancing guidelines. Revised signage has also been placed on basketball courts, skate facilities and MUGAs.
- 6.49 Playgrounds and outdoor gyms will continue to be taped off, with signage confirming that they are closed and cannot be used. Toilets will also remain closed.

7. RISK MANAGEMENT

- 7.1 The dedicated Covid-19 risk register is managed by the Coordination and Continuity Group with regular reports to Gold to ensure the risks are well managed and mitigating actions is taken.

8. CONSULTATION

- 8.1 There has been no formal consultations, due to the urgency needs in responding to the Covid-19 emergency. However, communications with partners has been key, as set out earlier in the report.
- 8.2 Communication with staff has also been critical. As services have been redesigned and staff redeployed to support front line services, regular

communications with all staff has been key. Communications have included direct emails, intranet articles, briefings and Q&A sessions with the Chief Executive.

9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 As reported to Cabinet on 11 May, and reported nationally, the Covid-19 response has created significant financial pressures for local government.
- 9.2 Since the previous Cabinet report, the Government has announced a further £600m of funding to support social care response to Covid-19 (infection control in care homes). This is in addition to the £3.2bn of additional funding previously announced for local government (of which Croydon received £19.9m).
- 9.3 However, The LGA has indicated that, nationally, the estimated financial impact is four or five times the amounts committed by government so far. As such, Croydon's allocation within this does not cover the anticipated whole year financial impact on the Council at this stage, due to the substantial increase in demand for supporting vulnerable residents, as well as the reduction in income as a result of the lockdown.
- 9.4 Ministers have indicated on a number of occasions that they recognise the financial impact on local authorities and are committed to supporting local government financially. We continue to provide feedback to MHCLG and London Councils regarding the costs being incurred.
- 9.6 There is a risk that the government may not fund all costs incurred as a result of Covid-19 and we know now that our costs will be greater than the funding allocated to date.
- 9.7 In response to this risk, the Council has established a Finance Review Board. This Board, which includes external financial experts, will support the council to develop and implement financial plans in response to the Covid-19 cost pressures.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk

10. LEGAL CONSIDERATIONS

- 10.1 The Head of Litigation and Corporate Law makes the following comments on behalf of the Director of Law and Governance.
- 10.2 The Coronavirus Act 2020 is the government's main legislative change in response to the pandemic. Most of its provisions came into effect on 25 March 2020 but detailed further legislation in the form of statutory instruments and government guidance have been issued since that date and continue to be published. The Act has temporarily modified duties and powers relating to social care, mental health, registration of deaths, inquests, the regulation of investigatory powers, gatherings events and premises, the postponement of elections, virtual local authority meetings and protection from eviction. Other

changes to existing legislation and statutory guidance continue to be monitored by the legal service.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

11. HUMAN RESOURCES IMPACT

- 11.1 The Covid-19 has had a very direct impact on people across Croydon, including staff.
- 11.2 As well as our responsibilities to residents, we have a duty of care to all staff. The Council as continued to ensure that staff have the guidance and equipment they need to carry out their work safely. This includes PPE.
- 11.3 As set out in the report, it is anticipated that most staff will continue to work remotely wherever they can, and in line with Government guidance. Risk assessment and social distancing adjustments will be completed before services restart and staff return to offices / other facilities.

Approved by: Sue Moorman, Director of Human Resources

12. EQUALITY IMPACT

- 12.1 There is no direct equality impacts arising from this report.
- 12.2 As set out in the previous Cabinet report, the impact of the virus is far reaching. The combined and unprecedented impact on the local economy, both on businesses and the workforce, will exacerbate inequalities, with some groups disproportionately impacted for the short, medium and long term. Data is increasingly highlighting that younger people are more likely to see reduced earnings or increased unemployment due to Covid-19.
- 12.3 Significant actions have been taken to safeguard vulnerable residents and certain population groups. In addition, the new Sustainable Croydon Economic Renewal Board has equality and inclusion as a core element of its remit.
- 12.4 The Government has launched a review, led by the NHS and Public Health England regarding the disproportionate impact on BAME residents. The Director for Public Health in Croydon has already engaged with national colleagues to ensure Croydon is involved in the review. The Cabinet Member for Safer Croydon & Communities and the Councillor BAME Champion have been working with community groups to ensure the local impact in Croydon is fed into the review.

Approved by: Yvonne Okiyo, Equalities Manager

13. ENVIRONMENTAL IMPACT

13.1 There has been a noticeable improvement in air quality and pollution levels across Croydon (as well as London, UK and globally). This provide an opportunity to take action in order to maintain the improved environment. The Leader of the Council has therefore asked the Croydon Commission for Climate Change to refocus its attention on short and medium term actions over the next 3 years.

14. CRIME AND DISORDER REDUCTION IMPACT

14.1 The police have reported a reduction in many crime rates during the Covid-19 pandemic.

14.2 However, there is concern about the potential for increased domestic abuse and sexual violence as a result of the lockdown, with people spending more time in doors. There is also the risk that it is harder for victims to report crimes or request help if they remain in lock down.

14.3 The FJC service has continued to be delivered throughout the lockdown. The service expanded to offer 7 days a week provision, to maximize the opportunity for anyone to contact them for support.

14.4 The Council has worked with partners and issued regular communications to raise awareness of the services available.

15. DATA PROTECTION IMPLICATIONS

15.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

15.2 The Director of Policy & Partnership advises that this report provides updates only, with no decisions that impact on data.

Approved by: Gavin Handford, Director of Policy & Partnership

CONTACT OFFICER: Gavin Handford, Director of Policy & Partnership

APPENDICES TO THIS REPORT: None

BACKGROUND PAPERS: None

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FOR GENERAL RELEASE

| | |
|------------------------|---|
| REPORT TO: | CABINET 8 JUNE 2020 |
| SUBJECT: | Developing a sustainable economic recovery and renewal plan for Croydon |
| LEAD OFFICER: | Shifa Mustafa, Executive Director of Place Stephen Tate, Director of Growth, Employment and Regeneration |
| CABINET MEMBER: | Councillor Tony Newman, Leader of the Council |
| WARDS: | All |

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

Covid-19 has had an unprecedented impact on a global scale, including the UK and Croydon. Our response will support the following Corporate Plan priorities:

- People live long, healthy, happy and independent lives
- Our children and young people thrive and reach their full potential
- There are good, decent homes, affordable to all
- Everyone feels safer in their street, neighbourhood and home
- We have a cleaner and more sustainable environment
- Everybody has the opportunity to work and build their career
- Business moves here and invests, our existing businesses grow
- We have an excellent transport network that is safe, reliable and accessible to all
- We value the arts, culture, sports and activities

FINANCIAL IMPACT

Whilst this report is for information, and therefore does not have any direct financial impact, it is clear that Covid-19 will have a significant impact on both the Council's financial position, as well as the financial position of residents and businesses across the borough. The Local Government Secretary has said in a number of public statements that local authorities will be reimbursed for costs associated with Covid19 and should not cut corners to manage financial costs.

To date the government has made a number of different funding streams available to local authorities to provide support for the costs we are incurring directly, however these do not currently cover the full cost being incurred.

FORWARD PLAN KEY DECISION REFERENCE NO.: Not a key decision

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Record its thanks to the Council's partners in the public, private and voluntary and community sector who have come together as one borough to respond to the Covid-19 crisis.
- 1.2 Note the approach now proposed for the Council to work in partnership towards a sustainable economic renewal strategy.
- 1.3 Approve the establishment of a cross-sector Croydon Sustainable Economic Renewal Board to lead and coordinate the borough's renewal plan.

2. EXECUTIVE SUMMARY

- 2.1 The Covid-19 outbreak has inflicted an unprecedented blow to communities and the local economy.
- 2.2 Croydon is one of London's most diverse boroughs. It has been heartening to witness how the whole community in Croydon has come together to help one another through this time. Together we are so much stronger in responding to this crisis. The report to cabinet in May 2020 gave an overview of Croydon's response to Covid-19. This report sets out in more detail the impact of the pandemic and lockdown on the local economy, our initial crisis response and our thinking on the steps that are needed in the medium and longer term.
- 2.3 Whilst the health implications of Covid-19 have been severe, it is also now clear that we are heading into a 'significant recession', potentially worse than the global financial crisis of 2008 - a crisis we have only recently recovered from after years of devastating austerity measures that took a dreadful toll on many of the most disadvantaged in our communities.
- 2.4 This new global recession will have a huge impact on businesses and employment in Croydon with long lasting consequences for communities across the borough.
- 2.5 On a national basis, we have seen over the last three months that the impact of the crisis has been to exacerbate existing inequalities, accelerate the decline of high streets and drive unemployment to record levels. The already disadvantaged are the hardest hit; these include: low earners, under-25s and women who are significantly more likely to work in a shutdown sector. Croydon, however, has demonstrated that it is a resilient borough and that we have the capacity to work in partnership to respond dynamically and work towards sustainable economic renewal.

- 2.6 The Council is taking a proactive approach to respond to the crisis. We have a multi-faceted role in supporting the community and the local economy. We have developed a detailed understanding of the state of the local economy and the likely impacts of the lockdown on various sectors in the short, medium and long-term. The Council procures goods and services, it is a major local employer and landowner. It is an investor in Croydon and a source of finance for local businesses and organisations. The Council is in the process of distributing £56m of government funding in grants to 4,118 local businesses. £2.87m of residual grant funding will be used to pay discretionary business grants under the scheme announced by government in May. We will use all our economic functions, as an employer, commissioner, landlord, builder and planner to support the local economy. Regeneration of our town centre is vital and in developing our plans we will be open to talking to all who want to work with us.
- 2.7 The Council also has a local leadership role. We convened a business taskforce comprising leading stakeholders from Croydon and London to understand the impact of the crisis, coordinate emergency interventions, and inform the initial development of a medium and long-term recovery plan. As a local leader we will encourage other large commercial, public and social sector organisations that are committed to Croydon to use local suppliers, employ local residents, pay the London Living Wage and implement best practice in fairness, equality and sustainability.
- 2.8 We are in a rapidly changing situation. The full local repercussions of a world-wide economic crisis are unclear as is the pace at which the lockdown in the UK will be relaxed. As such, we will take an evidence-based, cross-disciplinary approach to foster and support an economic renewal that results in a more equal, inclusive and environmentally sustainable local economy. In working with our partners for the renewal and reform of our local economy we will be guided by our determination to reduce poverty, ill-health, social isolation and inequality. We will continue to lobby government where we think that changes in policy or additional resources are needed to achieve this end.
- 2.9 To lead these efforts, we are proposing to establish a new Croydon Sustainable Economic Renewal Board who will develop a strategic and coordinated borough-wide response, across the public, private and voluntary and community sectors.

3. CROYDON SUSTAINABLE ECONOMIC RENEWAL BOARD

- 3.1 The Croydon Sustainable Economic Renewal Board will take a cross-disciplinary approach to foster and support an economic renewal that results in a more equal, inclusive and environmentally sustainable local economy. Mindful that Croydon is one of London's most diverse boroughs, it will address the inequalities arising from the impact of Covid-19 in terms of job losses and its targeting of the more vulnerable and black and minority ethnic communities. It will work in collaboration with the Croydon Climate Crisis Commission, to ensure that sustainability is at the heart of the economic renewal.
- 3.2 The Board will be chaired by the Leader of the Council. Its core membership

will comprise Croydon Council cabinet members for Economy and Jobs; Environment, Transport and Regeneration; Homes and Gateway Services; Culture, Leisure and Sport; and Safer Croydon and Communities. Other cabinet members will attend as necessary depending on the topic or theme of the meeting.

- 3.3 Membership will also be drawn from key stakeholders from the borough and region across the public, private and voluntary and community sectors, including the Greater London Authority (GLA), Coast 2 Capital Local Economic Partnership, Croydon Health Services NHS Trust, Croydon BME Forum, Croydon Business Improvement District (BID), London South Bank University, BH Live, Schroders, Gatwick Airport Limited, Unison, and the Council's Executive Director of Place..
- 3.4 The Board will consider key themes of economy, business and employment; housing; planning and development, regeneration, social infrastructure and culture; travel and transport; community safety; and third sector and volunteering. These themes may be explored in more detail through subgroups. The board will also consider cross cutting themes including environmental sustainability, equality and inclusion, and wellbeing.
- 3.5 The Board's decisions will be made as recommendations to the appropriate decision-making bodies of its constituent members.

4. THE IMPACT OF COVID-19 IN CROYDON

- 4.1 The Covid-19 pandemic is the biggest public health crisis this country has experienced in over 100 years. Croydon has faced a devastating toll with 1,485 lab confirmed cases (or 385.4 per 100,000) as at 18 May 2020, the 14th highest rate in England and 4th highest in London according to [Public Health England](#). Some of those affected across our community will be left with life-changing implications. Up to 8 May 2020 410 fatalities due to Covid-19 had been registered in Croydon according to the [ONS](#). Some vulnerable groups are at greater risk of catching the disease and/or more likely to die from it (including older people, people from black and minority ethnic (BME) backgrounds, the lower paid, people living in shared accommodation and those with underlying health conditions). We have been working closely with the voluntary and community sector to ensure that extremely vulnerable people can 'shield' themselves from risk whilst still accessing essential food and supplies.
- 4.2 As the number of cases increased exponentially and the NHS was at risk of being overwhelmed, the government implemented a lockdown on 23 March. This checked the increase and the number of new Covid-19 cases is now beginning to decline. However, by closing businesses across all sectors of the economy, the lockdown has inevitably had a major impact on jobs and livelihoods.
- 4.3 It is apparent that the immediate impact of Covid-19 will be felt until such time as a vaccine becomes available. This will drastically change how we live our lives, how we work, how we shop, how we move around the borough, how we spend our leisure time and how we interact with our loved ones.

- 4.4. As such, it is already clear that the public health crisis is now a major global economic emergency. According to the [IMF](#), the crisis could be worse than the global financial crisis of 2008, with global growth in 2020 falling by 6.3 percentage points to -3%. The [OECD](#) estimated that UK output could fall by 26% and consumer spending by 37%. Chancellor Rishi Sunak has warned that “a significant recession” in the UK is likely, with a fall in GDP of 5.8% recorded in March ([ONS](#)), almost as deep as the entire 6.9% drop in output seen over more than a year during the global financial crisis. This will have a huge impact on businesses and employment in Croydon with long-lasting impacts on communities across the borough.
- 4.5 The claimant count in the UK increased by 841,785 (66%) in the four weeks to 9 April 2020 (17 days after lockdown began) to 2.1 million, the highest claimant count since 1996 ([ONS](#)). In Croydon the increase over the same period was 5,830 (54%) to 16,725, not quite as steep as the 61% increase in London overall. Unemployment in Croydon could rise to 14%. Low-skilled, low paid workers, especially women and young people, are being disproportionately affected by the economic shock, according to the IFS. They are more likely to work in sectors that have been shut down or reduced, such as hospitality and retail, and the gig economy. They are also less able to work from home and may have childcare responsibilities. The ability to work from home makes jobs less vulnerable to being lost and higher paid groups are ten times more likely to be able to work from home. People in low paid, casual work who have few savings may face financial hardship now, but may also be in danger of losing their jobs permanently.
- 4.6 Already, the repercussions of the lockdown are being felt in the borough:
- 8,762 households are currently in crisis, at risk or struggling financially.
 - The number of incidents of domestic violence increased by 20.4% in the eight weeks since the lockdown started, compared with the previous eight weeks.
 - Private tenants risk losing their tenancies after the three month pause on evictions.
- 4.7 The Council has carried out detailed research and is developing an increasingly granular understanding of the state of our local economy as well as the short, medium and long-term impacts of the COVID crisis. Our latest research is a survey of Croydon businesses in May about Covid-19 impacts on job losses, access to government funding and resilience, including: contingency funding; insurance; ability to operate during the lockdown; and support needed. The findings of the survey will inform the continued delivery of our current response and the development of medium and longer term measures in our Sustainable Economic Recovery Plan.
- 4.8 Overall, 25% of jobs in Croydon are in highly resilient sectors; this is higher than the UK average employment share. 42% of jobs are in resilient sectors that are expected to experience moderate to high impacts from the lockdown. Croydon’s least resilient sectors have a smaller employee share (16% of jobs) than London and the South East, but they also remain important for the borough.

4.9 The impact on retail businesses across the country has been devastating and wide-ranging, affecting businesses both large and small. The retail sector has a high share of jobs in Croydon and will take an employment hit in the short term, particularly affecting low paid workers. This is likely to have a higher relative impact on Croydon than other comparator areas. Already Debenhams has announced its withdrawal from Centrale and smaller units are seeking support through the government's aid schemes. The Council is continuing to work across our partnerships to secure new uses for any units that may see businesses withdrawing now or in the longer term.

4.10 More detail on the sectors impacted by the lockdown is set out in Appendix 1.

5. THE COUNCIL'S INITIAL CRISIS REPOSE

5.1 The Council has been quick to respond to the crisis. We have worked with our partners to instigate a number of steps to support our businesses and residents; including:

Reinvigorating partnership

5.2 The Council has engaged with London Economic Action Partnership (LEAP) and Coast 2 Capital, both Local Enterprise Partnerships; the GLA; Transport for London (TfL); London Councils; and South London Partnership about our response. We have spoken to more than 3,000 local businesses and have convened a business taskforce to understand the impact of the crisis, coordinate emergency interventions, and inform the initial development of a medium and long-term recovery plan. The taskforce comprises leading stakeholders from Croydon and London, including Croydon, Purley and Central Parade BIDs, the Federation of Small Businesses, London Chamber of Commerce and Industry, London Growth Hub, Coast to Capital and LEAP.

Implementation of government grants and business rates relief schemes

5.3 4,888 Croydon businesses are being supported through 100% business rate relief in 2020/21 and/or a business grant of £10,000 or £25,000. 383 of these are businesses in the retail, hospitality and leisure sectors operating from properties with a rateable value above £51,000, who are receiving the 100% rate relief but no grant. As at 26 May 2020, 3,191 businesses (77.5% of eligible businesses) had received a total of £42.785m in business grants.

Council funding and debt management

5.4 Loans: Croydon Enterprise Loan Fund enables businesses to access loans of up to £50,000. We are in the process of repurposing this loan fund and using the funding to deliver restart and resilience packages for local businesses.

5.5 Grants programmes were quickly established: as at 15 May 2020 Croydon Cultural Relief Fund has given £60,253 in grants to 16 organisations and the Emergency Covid Fund for voluntary and community sector groups has given £185,951 in grants to 36 organisations.

5.6 The Council as landlord is considering offering the option of rent deferment for a set period to qualifying tenants of its commercial property portfolio.

Business support

- 5.7 Information, advice and guidance on how to respond to the crisis and access government support has been provided by the Council through dedicated webpages, telephone support and newsletters; and through Croydon Business Network and the Cultural Business Network. Businesses have also been signposted to further support from business advice hubs, Local Enterprise Partnerships and the borough's three Business Improvement Districts.

Contracts and provider support

- 5.8 The Council has contacted all contracted suppliers with information and given them a single point of contact. An early payment process has been established. Additional support is being offered to suppliers on a case-by-case basis to prevent provider failure.

External funding

- 5.9 We are recalibrating and refocussing existing external grants and funding to respond more effectively to the crisis and support recovery.
- 5.10 We are working with the GLA Pay it Forward team on the creation of a specific page for Croydon to facilitate free fundraising to help local businesses to secure trade by pre-selling vouchers, goods and services.

Responsive planning policy

- 5.11 The Council has taken a flexible approach to applications and planning obligations, to give businesses greater ability to adapt to the challenging circumstances of the lockdown.

Low traffic initiatives

- 5.12 The Council is creating temporary wider footpaths to facilitate social distancing, on-street spaces to exercise and temporary cycle lanes. The government has announced a £250m emergency active travel fund for local authorities to fund emergency bike lanes, wider pavements, safer junctions and cycle and bus-only streets and school streets; which we are currently lobbying for to ensure Croydon receives its fair share.

Employment support

- 5.13 We know that nationally low earners are seven times, under-25s are two-and-a-half times and women are a third more likely to work in a shutdown sector. A rise in precarious forms of employment is likely, including casual, short/fixed term and zero hour contracts. Self-employment is likely to grow due to the contraction of employment opportunities. These workers might have to suffer a significant reduction in income. Young people will require focussed interventions to prevent long term damage to this generation's prospects.
- 5.14 Croydon Works, the job brokerage service, has been getting in touch with all 3,600 registrants on its database to find out how they are faring and identify any employment needs. Additionally, Croydon Works has brokered new job opportunities to meet gaps in resources in health and social care, the police force and supermarkets, often supporting those who have lost their jobs due to the impact of Covid-19. Alongside the Council's Gateway Service, Croydon Works has given targeted individual support to prepare residents for the workplace and help them into work by collaborating with Croydon Adult

Learning and Training (CALAT) to deliver online sessions on employment skills.

- 5.15 CALAT delivers pre-entry level courses, qualifications at levels 1-4, and apprenticeships and work based training for employers. It provides courses suitable for all residents including people in disadvantaged groups, such as care leavers, people who are aged over 50 or long-term unemployed, and ex-offenders who may face additional barriers to access education, training and employment. CALAT is providing training in skills to enable people to apply for jobs in growing sectors of the economy. We have brought together education providers from across Croydon who met to look at addressing the challenges and opportunities.

6. THE GOVERNMENT'S RESPONSE

- 6.1 Since March, we have been working with businesses to help them to access new packages of Government support released in response to the Covid-19 crisis. In Croydon, this has primarily been focussed on small businesses and the self-employed, as this represents the vast majority of businesses (97.2% in Croydon). Government support has included:
- **Salary support:** employee furlough payments of 80% of pay till October (with reductions from August), a Self-Employed Income Support Scheme at 80% till May, and statutory sick pay rebates for small employers
 - **Deferred tax and rate relief:** VAT payments deferred until the end of June, and self-assessment income tax payments for July 2020 deferred for six months. 100% business rate relief in 2020/21 for small businesses and those in the retail, leisure and hospitality sectors.
 - **Business grants** of £10,000 and £25,000 to small businesses and those operating from smaller premises in the retail, hospitality and leisure sectors, and a discretionary fund of up to £617m for certain small businesses with fixed property-related costs ineligible for grant schemes.
 - **Access to credit** through the Coronavirus Business Interruption Loan Scheme (CBILS) for small businesses, with the fees and interest covered for one year, and a Coronavirus Large Business Interruption Loan Scheme. The Future Fund issues loans between £125,000 and £5m, subject to equal match funding from private investors, to innovative companies in financial difficulty that cannot access the CBILS. 100% fast track Bounce Back Loans of between £2000 to £50,000 for small businesses with fees and interest covered for one year. Loans for social enterprises, and some small businesses with cash-flow problems, through Big Society Capital and Access, the Foundation for Social Investment.
 - **Grants and loans** through Innovate UK for SMEs focussing on Research and Development.
 - **Temporary protection** of high street businesses from aggressive rent collection and closure until the end of June.
 - **Additional resources** are on offer in the form of helplines, webinars, growth hubs and the Find a Job service.
 - **Reopening High Streets Safely Fund:** Croydon will receive £341,995 from this Fund (announced on 23 May 2020) to introduce safety measures and marketing to reassure consumers and workers.

- 6.2 Despite the range of schemes, there are gaps in government support. Some businesses are not getting grants or loans because of eligibility criteria, including the sector in which they operate, or because they are not registered for business rates. More than 9,000 business in Croydon are not receiving support through a grant or business rate relief due to the following:
- 3,208 businesses are not in the retail, hospitality and leisure sectors and the rateable value of their premises is above the £15,000 threshold for a small business grant. However, these businesses may be eligible for other government support such as furlough schemes or loans.
 - 5,914 businesses are not based in shops or any physical premises and are therefore not entitled to grants. However, some may be eligible for the government self-employed income support scheme.

7. LOBBYING FOR MORE GOVERNMENT SUPPORT

- 7.1 Since the lockdown was introduced the Council has asked Rishi Sunak MP, Chancellor, and Alok Sharma MP, Secretary of State for Business, Energy and Industrial Strategy for more action to safeguard local businesses against the severe financial implications. With 23 other London council cabinet leads we successfully lobbied Rishi Sunak to request support for the self-employed. The Council also successfully lobbied the government for more support for victims of domestic abuse, including funding and pan-London arrangements.
- 7.2 In view of the gaps in support, the government's action does not go far enough. Croydon's MPs, in particular Steve Reed MP, have lobbied the government to ensure this Council and local government generally receive the funding they need to respond to the Covid-19 emergency.
- 7.3 We have asked Simon Clarke MP, Minister for Regional Growth and Local Government, to extend the limited period for which Croydon is allowed to be a member of Coast to Capital, as well as LEAP Local Enterprise Partnerships, in order to allow businesses access to funds.
- 7.4 The Council is working closely with other London local authorities, London Councils, the GLA, LEAP, South London Partnership, the Federation of Small Businesses (FSB) and London Chamber of Commerce and Industry (LCCI) on the lobbying campaigns and supporting our partners through lobbying activities.
- 7.5 The Council is supporting Croydon BID's 'Raise the Bar' campaign to raise the rateable value threshold so more local businesses qualify for business grants.
- 7.6 As outlined above, the Council is already responding to the crisis by increasing support for businesses and residents facing financial difficulties. In addition to this, we are now moving onto the next stage, working with our partners to lead the economic renewal of the borough that will help rebuild our businesses and provide sustainable employment opportunities for our residents. Our aim is that this renewal will help reduce inequalities and build on the commitment to environmental sustainability that we made before the crisis began.

8. PATH TO RECOVERY AND RENEWAL

- 8.1 Whilst the impact of Covid-19 has been wide-ranging and devastating across our community, we are confident that we can create a sustainable path to economic renewal by building on Croydon's many social and economic assets and by learning the lessons of the past three months. We will be more successful if our approach combines the goals of economic development, equality, poverty reduction, public health and environmental sustainability.
- 8.2 Croydon has a lot to build on. Even before this crisis hit, our borough was already on the path to Good Growth - our population and house building is increasing. It is the fifth largest business base in Outer London and the thirteenth largest in London overall. There are 14,010 businesses operating from 9,179 premises. In line with the rest of London and the UK, the overwhelming proportion (86.2%) of businesses in the borough are micro-sized (with fewer than 10 employees) or self-employed, demonstrating the strong entrepreneurial culture of our borough.
- 8.3 A significant amount of development and projects are already underway in the town centre, in part enabled by the Growth Zone programme. Whilst the Croydon Partnership (Westfield) Whitgift Centre re-development has yet to fully commence, there is an opportunity to review the scope and scale of the planned Croydon Partnership development. The Council will continue to liaise with the Partnership to maximise the contribution this could provide for the economic renewal of the town centre and borough as a whole. The Council is confident that the Growth Zone programme and accompanying financial planning can accommodate such changes, and that the development already underway across the town centre will support a regeneration and infrastructure programme of significant scale.
- 8.4 The review of our Local Plan presents a great opportunity to focus on the sustainable development of our town centre, district centres and places across the borough and support the work of the Croydon Sustainable Economic Renewal Board. Combined with the relative affordability of both our commercial and residential spaces and our close proximity to central London, we are an attractive place for businesses to invest and for Good Growth.
- 8.5 We want a recovery that provides opportunities for training and jobs in sectors that are economically sustainable and have prospects of future development and growth. Our employment support will ensure access to tailored support for disadvantaged residents disproportionately affected by the lockdown and those facing particular barriers to employment.
- 8.6 We can ensure wealth produced in Croydon stays local and is shared amongst many by:
- **Creating fair employment:** we pay the London Living Wage (LLW) and ask our providers to do the same. Our Good Employer Charter encourages local businesses to use local suppliers, employ local residents, pay the LLW and follow best practice in fairness, equality and sustainability.
 - **Progressive procurement:** extending our Value Croydon approach to work with key anchor institutions (large commercial, public and social sector

organisations that are committed to Croydon) so all reinvest as much of their spending as possible in the local economy

- **Using our land and property to benefit local people:** building and renewing housing with local labour and SME subcontractors. We support community land trusts and will transfer more under-used assets to the community if we think they will make better use of them.
- **Supporting local wealth creators:** through local economic development plans to make best use of assets and reactivate empty commercial property, and developing support for SMEs, social enterprises and co-ops.
- **Backing finance that supports our local place:** through Croydon Enterprise Loan Fund, Croydon Credit Union and pension fund investment.

8.7 Croydon's growing creative sector and Borough of Culture status in 2023 provide significant advantages for our renewal plans. The creative sector has been significantly impacted by the lockdown, with events cancelled and cultural venues and hospitality businesses closed for a significant period. We will seek regional and central government intervention to enable it to survive this further period of lockdown and go on to play a central role in the regeneration of Croydon.

8.8 The Croydon Sustainable Economic Renewal Board (described in Section 3) will lead this process, ensuring the development of a strategic and coordinated borough-wide response to the economic crisis arising from Covid 19 that addresses the health and economic inequalities that have been exacerbated by the pandemic.

9. CONCLUSION

9.1 The Covid-19 health and economic crisis is unprecedented, wide-ranging and devastating. However, Croydon is a resilient borough with a strong base upon which to re-build our economy. It is a major sub-regional economic centre. We have a young, agile population and an ingrained entrepreneurial culture with a high number of business start-ups. The high proportion of micro businesses and self-employed are likely to be more agile and flexible in the recovery.

9.2 Croydon is a fantastic place to live in. As we focus on renewal we have the opportunity to ensure our local economy grows and develops from within, and that wealth produced in Croydon stays local and is shared amongst many. We can build on the new form of localism that has arisen, fruit of the 'Stay at Home' message that has seen a shift towards local shopping, greater levels of walking and cycling and a rediscovery of local green and open spaces.

9.4 The strength of our partnerships has shone through in the initial crisis response and we have well-established forums for networking, collaboration and mutual support. This joint work provides a solid foundation on which to build the sustainable economic renewal of the borough.

10. CONSULTATION

- 10.1 To understand the impact of Covid-19 on the local economy and businesses and shape the response by the Council and its partners, we have engaged widely, with organisations such as the GLA and TfL, partner groups such as South London Partnership, and businesses, directly and through Croydon Business Network. We established a business taskforce comprising leading stakeholders from Croydon and London, including Croydon, Purley and Central Parade Business Improvement Districts (BIDs), the Federation of Small Businesses, London Chamber of Commerce and Industry, London Growth Hub, and the Coast to Capital and London Local Enterprise Partnerships (LEPs). The findings of this engagement have been outlined in this paper.
- 10.2 Whereas this paper concentrates on describing the impact so far of the crisis on the local economy and jobs, the proposal to create a Sustainable Economic Renewal Board that draws on partners from across the public, private and voluntary sectors is intended to ensure that our renewal plans and initiatives are drawn up through full engagement and consultation with stakeholders and partners across the Croydon community.

11 PRE-DECISION SCRUTINY

- 11.1 The Council has implemented the measures set out in this report as an immediate response to a rapidly developing economic crisis. The Scrutiny and Overview Committee will review and scrutinise the Council's response and make recommendations on the plans being developed for tackling the economic impacts of lockdown and on the management of the Council's response.

12 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 12.1 Whilst this report does not have any direct financial impact, it is clear that Covid-19 will have a significant impact on both the Council's financial position, as well as the financial position of residents and businesses across the borough. The Local Government Secretary has said in a number of public statements that local authorities will be reimbursed for costs associated with Covid19 and should not cut corners to manage financial costs.
- 12.2 The development of initiatives to support the sustainable economic renewal will require additional funding but this will be sought through external funding sources as far as possible.
- 12.3 Any specific proposals requiring capital investment or with implications for the council's revenue budgets will be considered under the existing financial regulations and brought for Cabinet approval if required by the scheme of financial delegation.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk

13. LEGAL CONSIDERATIONS

- 13.1 The Head of Litigation and Corporate Law makes the following comments on behalf of the Director of Law and Governance.
- 13.2 The report seeks to provide an update on the economic impact of the Covid-19 pandemic along with the partnership work that has been and will be undertaken in response.
- 13.3 In outlining the partnership work to be carried out the report highlights the need to establish an Economic Renewal Board to assist in the borough's recovery, by way of recommendation to the appropriate membership body, in accordance with the relevant legislation.
- 13.4 The Coronavirus Act 2020 ('the 2020 Act') is currently the government's main legislative change in response to the pandemic. Most of its provisions came into effect on 25 March 2020.
- 13.5 Following the inception of the 2020 Act further legislation in the form of statutory instruments along with the introduction of additional government guidance have been issued to tackle the issues that have arisen. The Act has temporarily modified many duties and powers including those relating to social care, mental health, registration of deaths, inquests, the regulation of investigatory powers, gatherings events and premises, the postponement of elections, virtual local authority meetings and protection from eviction.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

14. HUMAN RESOURCES IMPACT

- 14.1 There are no direct LBC workforce impacts arising from the recommendations in this report.

Approved by: Sue Moorman, Director of Human Resources

15. EQUALITY IMPACT

- 15.1 There are no direct equality impacts arising from this report.
- 15.2 The impact of the virus is far reaching. The combined and unprecedented impact on the local economy, both on businesses and the workforce, will exacerbate inequalities, where some parts of our communities are disproportionately impacted for the short, medium and long term. The Council has been acutely aware of the disproportionate impact that the virus and lock down can have on particular demographics, such as older residents and those with pre-existing health conditions.
- 15.3 The lock down has had a disproportionate impact on certain population groups. In addition to residents who were already struggling for a variety of reasons

(health, financial, housing), other groups became vulnerable (or more vulnerable). These include shielded residents, furloughed workers and homeless people.

- 15.4 According to the IFS, the immediate economic shock disproportionately affected low-skilled low paid workers, especially women, and young workers. They are more likely to work in shut down or reduced sectors like hospitality and retail and the gig economy, and are less able to work from home. People in low paid, casual work who have few savings may face financial hardship now, but may also be in danger of losing their jobs permanently. Lower income workers are less likely to have enough savings to cover income falls, even over a short period (Resolution Foundation).
- 15.5 Women make up 78% of the workforce in roles with high-risk of infection (2.5m out of 3.2m), such as social care, nursing and pharmacy. 1m are low paid (Autonomy) They are at high risk of job or income loss, in particular through having to take unpaid leave to cover care (as grandparents, schools and childcare are no longer available), and at more risk of domestic abuse and exploitation during lockdown. Women disproportionately work in retail and hospitality: 17% of female employees against 13% of men working in shutdown sectors.
- 15.6 Data has been emerging to suggest that residents from black and minority ethnic (BAME) communities are disproportionately affected by Covid-19. The government has launched a review, led by the NHS and Public Health England. The Director for Public Health in Croydon has already engaged with national colleagues to ensure Croydon is involved in the review. BAME residents are more likely to be living in low income households. Those in low paying jobs or on zero hours contracts will be more affected. Some may need help to access support. People with no recourse to public funds could become destitute. They are more likely to be living in overcrowded, multigenerational households, making the lockdown harder to endure and isolation less possible. Those with private tenancies may be anxious about their position once the pause on evictions ends.
- 15.7 Crisis actions have been taken by Croydon Works and CALAT to address the specific needs of disadvantaged groups; these are set out at 4.14 and 4.15 in the report.
- 15.8 The Sustainable Economic Renewal Plan will include more activities focused on continued tailored support for disadvantaged residents and building on the strong local community structures that have provided support to residents.
- 15.9 A key priority for the Council is to work with our partners to make Croydon a stronger, fairer place for all our communities. Croydon's Opportunity and Fairness Plan 2016-20 outlines actions to tackle inequalities such as educational attainment, health, homelessness, unemployment, crime and social isolation, particularly in the borough's six most deprived wards.
- 15.10 The proposed approach outlined in this paper is to ensure that the economic renewal of the borough is such that it improves lives across all parts of all our communities and provides for the optimum social, cultural, economic and

environmental outcomes for all. We will work with our partners to deliver against these principles.

- 15.11 A key area of focus for the board will be health and economic inequalities. We will work with partners to ensure that the response targets those who have been disproportionately impacted as a result of Covid, and reduces inequality across the borough.
- 15.12 As such, an Equality Analysis is not relevant to this paper but will be undertaken against any of the specific aspects of the programme e.g. consultations as well as for specific interventions or investment decisions that may follow from the Economic Renewal programme as appropriate and following the Council's guidance.

Approved by: Yvonne Okiyo, Equalities Manager

16. ENVIRONMENTAL IMPACT

- 16.1 There has been a noticeable improvement in air quality and pollution levels across Croydon (as well as London, UK and globally). This provides an opportunity to take action in order to maintain the improved environment. The Leader of the Council has therefore asked the Croydon Climate Crisis Commission to refocus its attention on short and medium term actions over the next 3 years.
- 16.2 The Sustainable Economic Renewal Plan that is developed will take account of the Commission's recommendations and contribute to the development of a decarbonised economy in Croydon. Initiatives to promote walking and cycling are set to receive investment from central government in light of the reduced capacity of public transport due to social distancing rules. Investment to make the public realm and high streets healthy will be an important part of attracting visitors back to the metropolitan and district centres. There is an opportunity to develop a retrofit programme of existing homes that could reduce carbon emissions and fuel poverty.

17. CRIME AND DISORDER REDUCTION IMPACT

- 17.1 As above, the economic renewal programme for the borough will include an integral consideration of the opportunities to address underlying issues of crime and disorder and prevent creating future issues through the principles of good design and strong community collaboration.

18. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 18.1 This report recognises the contribution of the Council's partners in the public, private and voluntary and community sectors who have come together as one borough to respond to the Covid-19 crisis. Having set out the impacts of the lockdown on Croydon's local economy and the council's initial response, it recommends the setting up of Croydon Sustainable Economic Renewal Board

to lead a strategic and coordinated borough-wide response, across the public, private and voluntary and community sectors, to the crisis and to help address the health and economic inequalities that have been exacerbated by the pandemic.

19. DATA PROTECTION IMPLICATIONS

19.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

The Director of Growth Employment and Regeneration advises that this report provides an overview only, with no decisions that impact on personal data.

Approved by: Stephen Tate, Director of Growth, Employment and Regeneration

CONTACT OFFICER: Lucy Webb, Head of Regeneration, 07784 225613
John Montes, Senior Strategy Officer, 020 8726 6000 Ext 61613

APPENDICES TO THIS REPORT: Appendix 1 – Summary of impact of the Covid lockdown on Croydon's economy

BACKGROUND PAPERS: None

Summary of impact of the Covid lockdown on Croydon's economy

Overall picture of Croydon business

- 1 Croydon is the fifth largest business base in Outer London and the thirteenth largest in London overall. There are 14,010 businesses operating from 9,179 premises. In line with the rest of London and the UK, the overwhelming proportion (86.2%) of businesses in the borough are micro-sized (fewer than 10 employees) or self-employed. 11% are small, having 10 to 50 employees.
- 2 Croydon's top five business sectors are professional, scientific and technical; construction; information and communication; retail; and business administration and support.
- 3 The largest concentration of businesses is in the Croydon Metropolitan Centre and surrounding area, with 37,000 employees working in 1700 businesses, which include Croydon's largest businesses. The centre is a major central government hub, with around 7,000 employees, which is set to increase, as more employees are moved out of Whitehall. The top five district centres for businesses outside the centre are Purley, South Norwood, Thornton Heath, Norbury and Shirley.

Summary of the impact on Croydon businesses

- 4 The Council has conducted detailed research and is developing a granular understanding of the state of our local economy and the short, medium and long-term impacts of the COVID crisis. Overall, 25% of jobs in Croydon are in highly resilient sectors. This is higher than the UK average employment share. Croydon's least resilient sectors have a smaller employee share (16% of the total workforce) than London and the South East, but they remain important for the borough. The retail sector has a high share of jobs and will take an employment hit in the short term, particularly affecting low paid workers. This is likely to have a higher relative impact on Gross Value Added (GVA) in Croydon

Highly resilient sectors

- 5 These sectors, that are expected to experience a moderate to low impact from to lockdown, provide around 36,000 jobs (25% of all jobs in Croydon). They contribute 51% of the total GVA to the local economy. The sectors are:
 - Finance and Insurance
 - Real estate
 - Tech, Information and Communication
 - Professional scientific and technical – includes engineering, tax consultancy, advertising and others
 - Education – mainly primary and secondary education
- 6 These sectors are considered to be high value due to the occupations of those employed, with specialist knowledge and skills required, often professional qualifications. A higher proportion of employees commute from other locations into Croydon, or commute out to work in other locations, such as the City, Inner London, or Surrey. The jobs tend to be higher paid. Historically these knowledge industries and science, technology, engineering and mathematics (STEM) related sectors are more resilient than others. There is a growing global demand for these goods and services and higher levels of innovation and automation in these sectors. While some job losses are anticipated (though not

on the scale of some of our larger sectors), it is highly likely that these sectors will continue to be supported in a future recession.

Resilient sectors

7 These sectors, that are expected to experience a moderate to high impact from lockdown, provide 60,000 jobs (42% of all jobs in Croydon). They contribute 36% of GVA to the local economy. The sectors are:

- Construction
- Transport and storage
- Public sector administration
- Retail – supermarkets are the main employers in this sector
- Health and social care

8 As these sectors have a greater employment share in Croydon, any change is likely to have a greater impact on employment numbers. Sectors other than construction and the public sector tend to be labour intensive; jobs tend to be low paid or low skilled. The construction, retail, and health and social care sectors have an agile and flexible workforce with a high turnover of staff. The retail sector is historically less resilient than knowledge industries because it is reliant on consumer demand. Construction will be affected by global supply chains as countries come out of lockdown but the sector is likely to be stimulated by housebuilding programmes and major infrastructure projects. Most employees will be furloughed, but high job losses are nonetheless anticipated in the retail and health and social care sectors, particularly affecting the low paid and women. Due to their size and high contribution to GDP, significant restructuring of these sectors is anticipated through automation, leading to return to growth over time.

Sectors of low resilience

9 These sectors, that are expected to experience a high impact from lockdown, provide 23,000 jobs (16% of all jobs in Croydon). They contribute 9% of GVA to the local economy. The sectors are:

- Art, recreation and entertainment
- Business administration and support services
- Accommodation and food services

10 These sectors have a more modest employment share in the borough and any change is likely to have a greater impact on the sector as a whole. They tend to be labour intensive; jobs tend to be low paid or low skilled. They have an agile and flexible workforce with a high turnover of staff. These sectors are less resilient than others because of their high dependency on consumer behaviour. This is why this sector is the focus of government support packages. High job losses are anticipated in the short term as businesses struggle to stay afloat. They will experience a long term impact, depending on the duration of the lockdown. Survival will depend on how quickly businesses can adapt and restructure. Although this sector is not a major employer, it is important that our plans ensure that Croydon remains rich in amenities and has a vibrant cultural life through local and central government intervention. On this will depend the growth of Croydon's evening and night time economy and future inward investment.

Agenda Item 7

| | |
|------------------------|--|
| REPORT TO: | CABINET 8 June 2020 |
| SUBJECT: | South London Waste Plan – Publication of Proposed Submission draft and Submission to the Secretary of State |
| LEAD OFFICER: | Shifa Mustafa, Executive Director Place Heather Cheesbrough – Director of Planning and Strategic Transport Steve Dennington, Head of Spatial Planning |
| CABINET MEMBER: | Councillor King – Cabinet Member for Environment, Transport & Regeneration (acting – Job Share) Councillor Scott – Cabinet Member for Environment, Transport & Regeation (non-acting – Job Share) |
| WARDS: | All |

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

Include here a brief statement on how the recommendations address one or more of the Council's Corporate Plan priorities:

[Corporate Plan for Croydon 2018-2022](#)

Through the publication of the Proposed Submission draft of the South London Waste Plan, the Council will ensure that Croydon meets the corporate plan priority to have a cleaner and more sustainable environment. The South London Waste Plan enables Croydon to plan for the management of waste and recycling, taking account of the growth in the population and the emerging London Plan's waste apportionments.

FINANCIAL IMPACT

In 2018, the four boroughs successfully bid for £136,594 from the Ministry of Housing, Communities and Local Government's Planning Delivery Fund for joint working to produce a new South London Waste Plan. Not all of this funding has been spent and the South London Waste Plan continues to be funded from this grant award.

FORWARD PLAN KEY DECISION REFERENCE NO.: 1720CAB

The decision may be implemented from 1300 hours on the 6th working day after the decision is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

Cabinet is asked to recommend that Full Council:

- 1.1 Approves the submission of the draft South London Waste Plan (Appendix 1) and its associated Sustainability Appraisal (Appendix 2) to the Secretary of State following the conclusion of the statutory 6-week publication period in accordance with Section 20(1) of the Planning and Compulsory Purchase Act 2004;
- 1.2 Delegates to the Cabinet Member for Environment, Transport and Regeneration (Job Share), in consultation with the Director of Planning and Strategic Transport, the agreement of any Main Modifications required by the appointed Planning Inspector to make the South London Waste Plan sound;
- 1.3 Delegates to the Cabinet Member for Environment, Transport and Regeneration (Job Share), in consultation with the Director of Planning and Strategic Transport the publication of any Main Modifications required by the appointed Planning Inspector for formal consultation; and
- 1.4 Delegates to the Director of Planning and Strategic Transport in consultation with the Cabinet Member for Environment, Transport and Regeneration (Job Share) the making of minor modifications and factual corrections (that are not required to make the South London Waste Plan sound).

The Cabinet is recommended to:

- 1.1 Approve publication of the Proposed Submission South London Waste Plan (Appendix 1) and its associated Sustainability Appraisal (Appendix 2) for six weeks for representations to be made upon it, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
- 1.2 Approve that the Proposed Submission draft of the South London Waste Plan be recommended to Full Council for submission to the Secretary of State subject to conclusion of the statutory 6-week publication period; and
- 1.3 Delegate to the Director of the Director of Planning and Strategic Transport in consultation with the Cabinet Member for Environment, Transport and Regeneration (Job Share) minor and / or factual changes to the Proposed Submission South London Waste Plan prior to publication.

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to seek Cabinet approval to the publication of the Proposed Submission South London Waste Plan for a period of a minimum of 6 weeks, to take place between September to October 2020.
- 2.2 This report also seeks Full Council approval to submit the Proposed Submission South London Waste Plan to the Secretary of State for examination upon conclusion of the statutory six-week publication period.
- 2.3 This is a joint plan undertaken by the four boroughs of Merton, Kingston, Sutton and Croydon which updates the adopted South London Waste Plan 2012-22 which allocated sites, created planning policies and designated areas suitable

for waste management development. This existing South London Waste Plan will finish in 2022. The Proposed Submission South London Waste Plan sets out how the projected amounts of waste to be generated within the four boroughs and the amount of waste apportioned to the boroughs in the emerging London Plan will be managed.

3. DETAIL

Context

- 3.1 In 2012, LB Sutton, LB Croydon, RB Kingston and LB Merton adopted the South London Waste Plan (Development Plan Document) 2011-2021 to provide policies for deciding planning applications for waste use. The plan also safeguarded existing waste sites and identified areas which may be suitable for waste use. Now the plan period for the South London Waste Plan is coming to an end, it is necessary to prepare a new plan to cover the period from 2021 to 2036.
- 3.2 While LB Sutton and LB Croydon were preparing their local plans, it was agreed that the same four boroughs would collaborate on a new South London Waste Plan. The reasons for the collaboration are:
- Without waste policies, all four Councils would be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon have waste policies nor do the emerging Local Plans for Kingston and Merton
 - It is a specialised area of planning that has specific policy requirements
 - Waste treatment is best considered in a regional context, with a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years
 - All London boroughs have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008) (as amended). Paragraph 3 of the National Planning Policy for Waste (October 2014) also requires waste planning authorities to plan to meet their identified waste and advises collaborative working. The emerging London Plan Policy SI8 (December 2019) also sets targets for boroughs to meet in terms of waste management.
- 3.3 The National Planning Policy for Waste states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their waste plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.
- 3.4 The emerging London Plan sets the boroughs the target of managing 100% of London's waste within Greater London by 2026 and having zero biodegradable and recyclable waste going to landfill by 2026. It also sets targets for local authority-collected waste, commercial and industrial waste and construction, demolition and excavation waste.

- 3.5 With a significant need for new homes and consequent commercial activity planned across London, the need to provide essential infrastructure such as waste facilities to meet this growth is, therefore, a regional strategic priority.
- 3.6 The new South London Waste Plan will give the opportunity for the four south London boroughs to ensure that they conform to the waste-related policies in the London Plan, the National Planning Policy Framework and the National Planning Policy for Waste. It will also help the four boroughs to work together to review the long-term vision and objectives to consider waste as a resource in South London, supporting the circular economy (promoting the recycling and re-use of waste materials).
- 3.7 Since the current South London Waste Plan was adopted in 2012, the four boroughs have been working closely together on:
- Monitoring the South London Waste Plan annually
 - Fulfilling the legal Duty to Co-operate with other councils on waste management issues, responding to other Local Development Plans for waste management.
 - Preparing and submitting a successful bid for government funding to support a new South London Waste Plan 2021-2036 on the basis of joint working.
- 3.8 In 2018 the four boroughs successfully bid for government funding (Planning Delivery Fund – Joint Working) for £136,594 to support the project.
- 3.9 Part of the funding was used by the partner boroughs jointly appointed consultants, to review all the relevant waste data within the four partner boroughs, such as, the features of the existing waste transfer and management sites, the origin, destination and quantity of each type of waste that is imported and exported, the projected amounts of waste to be generated within the four boroughs and the capacity to manage the amount of waste apportioned to the partner boroughs in the emerging London Plan.
- 3.10 This research informed the previous South London Waste Plan (Issues and Preferred Options) consultation. The Issues and Preferred Options consultation ran from 31 October 2019 to 22 December 2019.

Relationship with the South London Waste Partnership

- 3.11 Although the South London Boroughs already work together as the South London Waste Partnership and have a shared contract for the municipal collection and disposal of waste, the South London Waste Plan relates to the waste planning functions and responsibilities of the South London Boroughs as Waste Planning Authorities. This is not a plan about waste collection or disposal.
- 3.12 As a Local Development Plan document, at a strategic level, the South London Waste Plan considers the local authority collected waste and the other forms of waste collected by private contractors, and accordingly safeguards sufficient sites to treat both the South London Waste Partnership's waste needs and that of other commercial waste operators.

3.13 At a more detailed level, the policies in the South London Waste Plan will be used to assess the merits of any planning application submitted by the South London Waste Partnership's contractor or any other commercial waste operator.

The Proposed Submission draft of the South London Waste Plan

3.14 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that "planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise". Currently the development plan in Croydon consists of the London Plan, the Croydon Local Plan 2018, and the South London Waste Plan.

3.15 The revised South London Waste Plan covers:

- Strategic planning policies that set out how applications for each type of waste, e.g. Local Authority Collected Waste, Construction, Demolition and Excavation Waste, Hazardous Waste, Agricultural Waste, Clinical Waste, Radioactive Waste, Waste Water will be treated.
- Detailed planning policies that set out how applications will be assessed with regards to matters such as sustainable construction, amenity impacts, transport, sustainable energy recovery and planning obligations.
- It also includes a new policy on the principle of new development needing to take mitigation measures rather than the established uses (known as the Agent of Change principle). It also includes a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies
- Sites safeguarded for waste facilities, with relevant issues highlighted for each site, if proposals were developed for intensification of the existing waste operations.

3.16 The previously approved South London Waste Plan (Issues and Preferred Options) forms the basis of the Proposed Submission South London Waste Plan. There are, however, a number of changes which have been made in the light of the consultation and other developments. The major changes are:

- Key Issue 3 - Scarcity of Land has been updated to reflect the fact that the emerging London Plan housing targets have been reduced and to provide more statistics on the demand for industrial land from non-waste industrial uses
- The Vision and Objectives have been amended because they did not quite reflect the policies
- Policy WP2 (Strategic Approach to Other Forms of Waste) has been amended to reflect the move from a shortfall in Construction and Demolition Waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of some other councils in the South East of England
- Policy WP6 (Sustainable Construction of Waste Facilities) has been amended so that the sustainability credentials can be measured against one and/or two sustainability metrics
- Policy WP8 (New Development Affecting Existing Sites) is a new policy. It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy.

- Policy WP10 (Monitoring and Contingencies) is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies
- Site C2 (Croydon Car Spares, Croydon) has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties
- Site C3 (Curley Skip Hire, Croydon) has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses
- Site C5 (Factory Lane Waste Transfer Station) has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling)
- Site K1 (Chessington Equestrian Centre) has been deleted because it is a temporary site which is closing soon
- Changes to the safeguarded sites in Sutton comprise boundary changes, references to overhead power lines and references to the need of a transport assessment including cumulative impacts
- An appendix setting out a table of indicators for monitoring the policies has been added.
- The appendix showing waste throughput figures has been updated to reflect the latest information from site owners as to which sites may be intensified

What happens next

3.17 The publication on the Draft South London Waste Plan is scheduled to take place in autumn 2020. As the South London Waste Plan is a Development Plan Document, the representations procedure is governed by statutory requirements and, for the final South London Waste Plan to be legally compliant, the publication and seeking of representations must conform with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (SI 2012/767). Any objections to the draft plan must be made with reference to the Test of Soundness for Development Plan Documents, set out in Paragraph 35 of the National Planning Policy Framework and reproduced in the table below.

NPPF Tests of Soundness for Development Plan Documents

| Test of Soundness Definition | |
|--|--|
| Positively Prepared | Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; |
| Justified | An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; |
| Effective | Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and |
| Consistent with National Policy | Enabling the delivery of sustainable development in accordance with the policies in this Framework. |

3.18 Following the publication, there are a number of procedural steps that need to be followed before the plan can be adopted and these are set out in the table below.

Steps to Adoption

| Steps | Timescale (approximate) |
|---|--------------------------------|
| Draft South London Waste Plan Published and Representations Sought | 0 weeks |
| End of Representations Period | +7 weeks |
| Consideration of Representations | +10 weeks |
| Submission to the Secretary of State | +10 weeks |
| Appointment of Planning Inspector | +12 weeks |
| Start of Hearings for the Examination-in-Public | +20 weeks |
| End of Hearings for the Examination-in-Public | +22 weeks |
| Main Modifications (arising from the Examination-in-Public) Consultation <i>Note: This stage may not be required</i> | +26 weeks |
| Issuing of the Inspector's Report | +34 weeks |
| Adoption at Full Council | +44 weeks |

4. CONSULTATION

- 4.1 Between 31 October and 22 December 2019, the four Councils consulted on an South London Waste Plan (Issues and Preferred Options). The document proposed eight draft planning policies and identified 46 existing waste sites across the four boroughs for safeguarding for waste treatment uses over the plan period to 2036. Importantly, the document identified that the four boroughs could meet their target for Household, Commercial and Industrial Waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the Construction and Demolition Waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.
- 4.2 The consultation in Croydon comprised: contacting all those of the planning policy consultation database; a dedicated webpage on the planning policy section of the Council's website; documents available at Council offices and libraries; and a notice in the Croydon Guardian. Consultation took place partly alongside that for the Issues and Options for the Croydon Local Plan review and when publicising this latter consultation, mention was also made to the South London Waste Plan consultation as well.
- 4.3 The consultation closed with 78 individual representors making 1,155 representations. A summary of the responses are set out in the table below.

The complete list of representations with officers' comments are set out in Appendix 3.

Summary of Representations from the Issues and Preferred Options Consultation

| Representor | Comment | Officers' Comment and Actions |
|--|---|---|
| The Mayor of London | <ul style="list-style-type: none"> ◆ Councils must remove their no new sites policies because it does not allow better waste management (reuse is preferred to recycling is preferred to other waste management) or new technologies coming forward ◆ Waste sites which are not required by the boroughs should be offered to other London boroughs ◆ No contingencies for plan not delivering | <ul style="list-style-type: none"> ◆ Officers intend to keep to the 'no new sites policy' because the councils can meet their waste targets through existing sites only and there is great demand for land from non-waste industrial uses, which the Councils must also meet. ◆ The Councils' targets are already 13% above the waste the Councils produce so the Councils are already more than playing their part in meeting Greater London's waste. ◆ A contingencies plan is accepted <p><i>See 'Risks' below.</i></p> |
| Councils outside London (notably Kent, Surrey, Essex and Northants) | <ul style="list-style-type: none"> ◆ The Councils have not dealt with the exportation of waste to the South East, particularly Construction, Demolition and Excavation Waste ◆ The plan was too restrictive and the Councils would not meet their targets | <ul style="list-style-type: none"> ◆ Officers have some sympathy with this position as the South East councils have received London's waste for many decades. However, this is not the case for south London now. ◆ The South London Waste Plan area can meet its waste targets without the need for new waste sites. <i>See 'Risks' below</i> |
| Transport for London | Additions and clarifications | Accepted |
| Environment Agency | Additions and clarifications | Accepted |
| National Grid | Additions and clarifications | Accepted |
| Historic England | Additions and clarifications | Accepted |
| NHS England | Request for additional clinical waste facilities | Unable to obtain further details <i>See 'Risks' below</i> |
| Metropolitan Police Service | Additions and clarifications | Accepted |
| Thames Water | Support | Accepted |
| Viridor | Request for sufficient outdoor operating space | Reduced boundary of Beddington Farmlands Energy Recovery Facility |
| SUEZ | Request for 'Agent of Change' policy (ie: new | Accepted |

| | | |
|----------------------------|--|--|
| | development must mitigate effects from established uses) | |
| Veolia | Request for 'Agent of Change' policy (ie: new development must mitigate effects from established uses) | Accepted |
| Days Aggregates | Request for greater flexibility and correction that the site managed 168,000 tonnes per annum of Construction and Demolition waste | Accepted. This representation meant the shortfall for Construction and Demolition Waste target has been eliminated |
| Poppymill Ltd | Delete the Chessington Equestrian Centre site as it is temporary use | Accepted |
| Curley Skip Hire | Delete the Curley Skip Hire site because it is adjacent to residential uses | Accepted |
| Wandle Valley Forum | Additions and clarifications | Accepted |
| Residents | Numerous issues | See Appendix 3 |

5 PRE-DECISION SCRUTINY

- 5.1 The South London Waste Plan has not been to a scrutiny meeting. The decision to submit the draft South London Waste Plan to the Secretary of State rests with the Council as a whole and cannot be a decision of the Executive alone.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 In 2018, the four boroughs successfully bid for £136,594 from the Ministry of Housing, Communities and Local Government's Planning Delivery Fund for joint working to produce a new South London Waste Plan. Not all of this funding has been spent and the South London Waste Plan continues to be funded from this grant award. Both the examination and adoption of the new South London Waste Plan will also be funded from the remaining Planning Delivery Fund grant. As project managers the London Borough of Sutton manage the project budget and this stage of the Plan's production does not create any budget pressure for the Council.

6.2 Risks

Conformity with the London Plan: Section 19 of the Planning and Compulsory Purchase Act (2004, as amended) requires Development Plan Documents to be in "general conformity" with the London Plan. The Mayor of London has written to the councils to say in some respects the plan is in conformity and in some aspects it is not in conformity. The councils consider

that the plan is in *general* conformity, but not necessarily in absolute conformity. Councils' officers intend to meet GLA officers to discuss the Mayor's opinion and resolve issues where possible. In any event, it is the Planning Inspector at the Examination-in-Public who will make the judgement on whether the plan is in general conformity with the London Plan.

Objections from councils in the South East: Section 33A of the Planning and Compulsory Act (2004, as amended) requires the councils to co-operate with other local authorities where there are significant strategic, cross-boundary issues. Waste is defined as a strategic issue and the movement of waste is a cross-boundary issue. Therefore, the councils need to come to an understanding with the South East authorities over the movement of waste. The councils are currently attempting to conclude statements of common ground with relevant authorities.

Objection from NHS England: During the South London Waste Plan Issues and Preferred Options Document, the councils received a representation from NHS England requesting additional clinical waste treatment facilities in the plan area. Officers have been unable to contact NHS England to ascertain the nature and scale of the additional facilities requested and so have not included a reference in the plan. Should NHS England make a further representation at the Draft South London Waste Plan publication and representation stage, the councils will consider the representation, possibly make a proposed change and present it to the Planning Inspector at the Examination-in-Public to consider.

6.3 **Options**

Abandon the Waste Plan - This would leave the councils with no planning scope to refuse inappropriate waste treatment planning applications or negotiate amendments to inappropriate waste treatment planning applications and pre-applications

Accept all representations and produce a draft plan accordingly - This would mean that the councils would have very limited scope to refuse inappropriate waste treatment planning applications. It could also lead to a situation where unnecessary waste operations occupy industrial land required by non-waste industrial uses, which have an identified need.

Accept the representations which enhance the councils' overall strategy and produce a draft plan accordingly (selected option) - This gives the councils the necessary planning scope to approve appropriate waste treatment planning applications and refuse those that are inappropriate.

6.4 **Future savings/efficiencies**

The project is being fully funded by a government grant.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk and S151 Officer

7. LEGAL CONSIDERATIONS

- 7.1 It is commented on behalf of the Director of Law and Governance that as waste planning authorities, all four of the boroughs have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008) (as amended).
- 7.2 The Housing and Planning Act 2016, gives the Secretary of State greater powers to intervene in the Local Development Plan making process. Specifically it would allow the Secretary of State to intervene if a local authority was failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a Local Development Plan.
- 7.3 The Draft South London Waste Plan has been produced according to the Planning and Compulsory Purchase Act (2004, as amended) and the Town and Country Planning (Local Planning) (England) Regulations (SI 2012/767). The requirement to send the Draft South London Waste Plan to Full Council for approval to submit to the Secretary of State arises from Regulation 3 of the Local Authorities (Committee System) (England) Regulations (SI 2012/1020).

Approved by Samra Yunus ,Corporate Solicitor on behalf of Sean Murphy the Director of Law and Governance & Deputy Monitoring Officer

8. HUMAN RESOURCES IMPACT

- 8.1 There are no Human Resource impact as the production of the South London Waste Plan is set out in the Spatial Plan Service Plan and can be delivered with the current establishment staff level. If any issues arise these will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Place & Interim Head of HR Resources for and on behalf of Sue Moorman, Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 The Sustainability Appraisal, accompanying the Draft South London Waste Plan, includes a comprehensive Equalities Impact Assessment covering all four boroughs involved.
- 9.2 The Equality Analysis concluded that the proposed policies are expected to have a positive impact on groups that share a protected characteristic. Further details can be found in on pages 27-28 of Appendix 1 (Equality Impact Assessment)

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 A full Sustainability Appraisal (incorporating a Strategic Environmental Assessment) of the draft South London Waste Plan has been prepared and the findings incorporated into the Proposed Submission report. This can be found in Appendix 3 of this report. Under the Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004, the Sustainability Appraisal must also be consulted upon alongside the draft South London Waste Plan.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no known direct crime and disorder impacts.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 Publication of the Proposed Submission report is an essential and statutory requirement in preparing the South London Waste Plan. The draft South London Waste Plan (Proposed Submission) report is considered to be positively prepared, justified, effective and consistent with national policy.
- 12.2 In the absence of the new South London Waste Plan future planning decisions will be at risk of challenge as there could be the absence of an up to date development plan and possible non-conformity with London Plan policy.
- 12.3 Following the Proposed Submission publication period, submission of the draft South London Waste Plan is the next essential step in the statutory process of preparing a Development Plan Document.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 There are no options with regard to publication as the processes being undertaken is specified by statutory requirements. The South London Waste Plan (Issues and Preferred Options) report contained all the options previously considered and rejected. This has been consulted upon and following the responses taken into account in preparing the South London Waste Plan (Proposed Submission). It is proposed that the South London Waste Plan (Proposed Submission) report be published so representations can be made by interested parties and those representations can be considered at Examination in Public by an independent Planning Inspector following submission to the Secretary of State.

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

YES

All representations made on the South London Waste Plan will be processed by the London Borough of Sutton on behalf of the four Waste Planning boroughs. Any representations submitted to Croydon Council will be forwarded to the project manager in Sutton.

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

YES

The Director of Planning and Strategic Transport confirms that a DPIA has been completed and will be kept under review.

Approved by: Heather Cheesbrough, Director of Planning and Strategic Transport

CONTACT OFFICER: Dominick Mennie, Team Leader (Plan Making) ext 62877

APPENDICES TO THIS REPORT:

Appendix 1 – Draft South London Waste Plan (Proposed Submission)

Appendix 2 – Sustainability Appraisal of the South London Waste Plan (incorporating a Strategic Environmental Assessment and an Equalities Assessment)

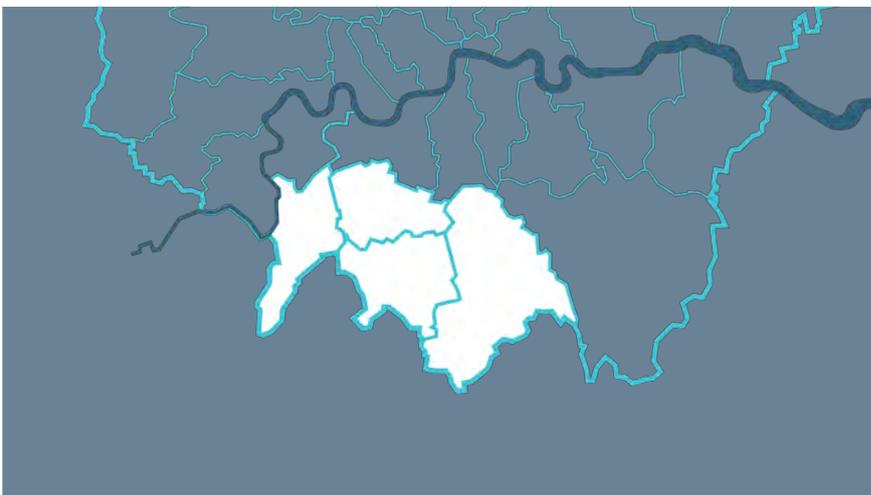
Appendix 3 – Representations on the South London Waste Plan Issues and Preferred Options consultation

Appendix 4 – DPIA

BACKGROUND PAPERS: None

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



South London **Waste Plan**



**Draft for Submission to Government
Consultation Document**

September 2020



The Publication and Request for Representations

This is the Submission Version of the South London Waste Plan 2021-2036.

The South London Waste Plan is a joint document produced by the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton to guide the development of waste treatment facilities across the four boroughs. It includes policies to guide waste treatment development and safeguards existing sites.

This document is termed the Submission Version because it is intended to be submitted to the Secretary of States for Housing, Communities and Local Government for Examination-in-Public.

The publication of the Submission Version of the South London Waste Plan is undertaken to meet the requirements of Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012.

An accompanying Sustainability Appraisal is also available for consultation.

Representations to be made

from xxday xx xx 2020 to xxday xx xx 2020

The planned timetable for the South London Waste Plan is also follows:

| | |
|---------------------------------|---|
| February - June 2019 | Evidence Gathering |
| October - December 2019 | Issues and Preferred Options Consultation |
| September - October 2020 | Submission Version Representations |
| November 2020 | Submission to the Secretary of State |
| January 2021 | Examination-in-Public |
| March onwards | Adoption |

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|--|----|
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| C9 Pear Tree Farm, Featherbed Lane, Croydon | 51 |
| C10 Purley Oaks Reuse and Recycling Centre, Brighton Road, Croydon | 52 |
| C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon | 53 |
| C12 Stubbs Mead Depot, Factory Lane, Croydon | 54 |
| C13 Solo Wood, 43 Factory Lane, Croydon | 55 |

| | | |
|------------|---|----|
| K2 | Genuine Solutions Group, Unit 1A, 223 Hook Rise South, Kingston | 57 |
| K3 | Kingston Civic Reuse and Recycling Centre, Chapel Mill Road, Kingston | 58 |
| K4 | Kingston Waste Transfer Station, Chapel Mill Road, Kingston | 59 |
| M1 | B&T@Work, Unit 5c, Wandle Way, Merton | 61 |
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The South London Waste Plan – What It Is

- 1.1 The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 to 2036. It is to 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, Royal Borough of Kingston, London Borough of Merton and 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:
- www.croydon.gov.uk/planningandregeneration/framework
 - www.kingston.gov.uk/info/200157/planning_strategies_and_policies/285/development_plan_documents
 - www.merton.gov.uk/planning-and-buildings/planning/localplan
 - www.sutton.gov.uk/planningpolicy
- 1.5 The London Plan can be accessed at:
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 is the replacement document covers 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 and is usually shown in an inverted pyramid-like diagram, see overleaf. 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.
- 2.7 The waste hierarchy 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.



Figure 1
The Waste Hierarchy

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:

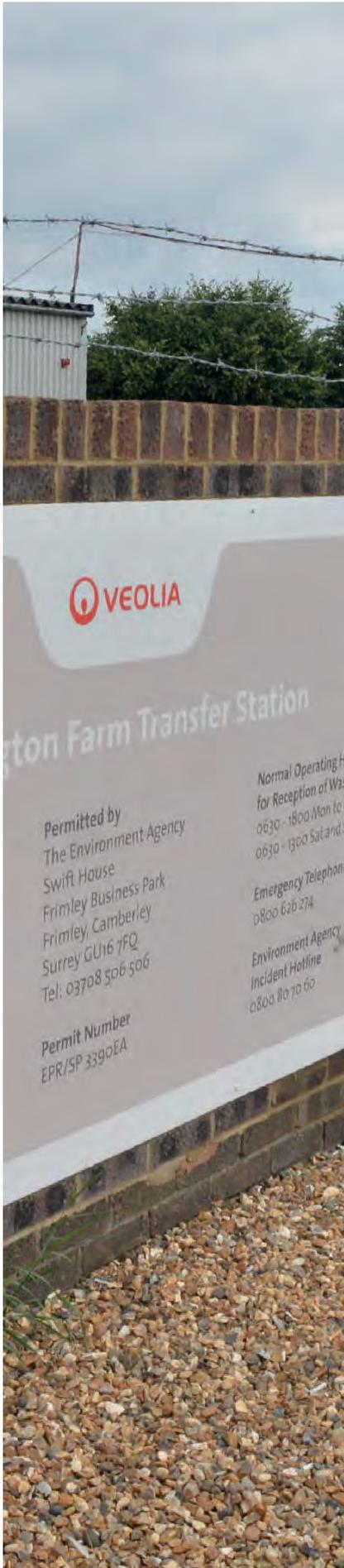
- Deliver sustainable and efficient facilities
- Consider waste management alongside other requirements such as transport, housing and jobs
- Ensure businesses and residents are engaged
- Drive waste up the Waste Hierarchy

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 into consideration the policies and targets of the 2020 London Plan.
- 2.11 The 2020 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 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 2020 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 any 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

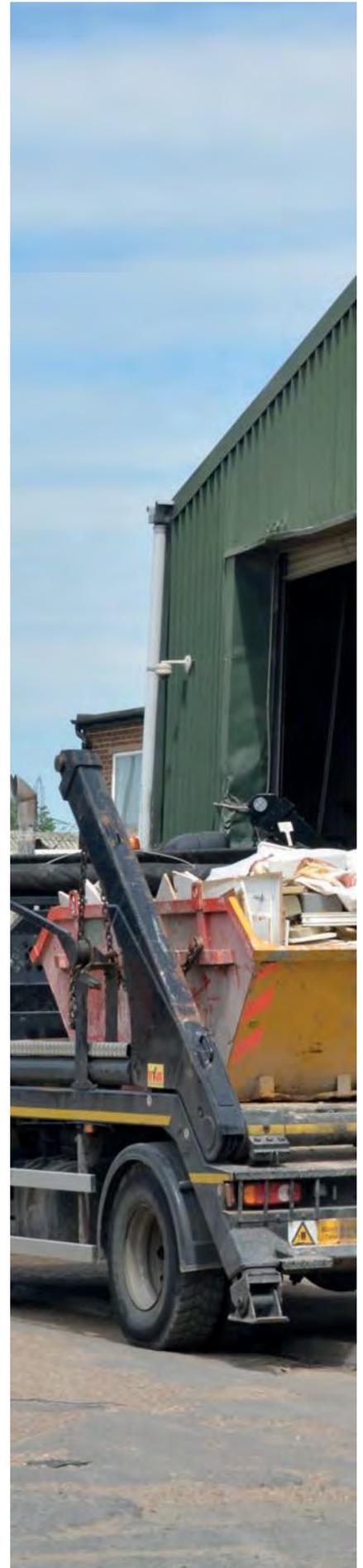
2.16 This plan is accompanied by a Sustainability Appraisal. The purpose of a Sustainability Appraisal is to evaluate development policies and proposals through the integration of social, environmental and economic considerations during the preparation of the planning documents. The South London Waste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

Equalities Impact Assessment

2.17 The plan has also been subject to 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 has been undertaken as part of the preparation for this South London Waste Plan and is an ongoing process.





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 (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 South London Waste Plan and has influenced the Plan's production.
- 3.3 Evidence supporting the South London Waste Plan 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 available on line. 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.

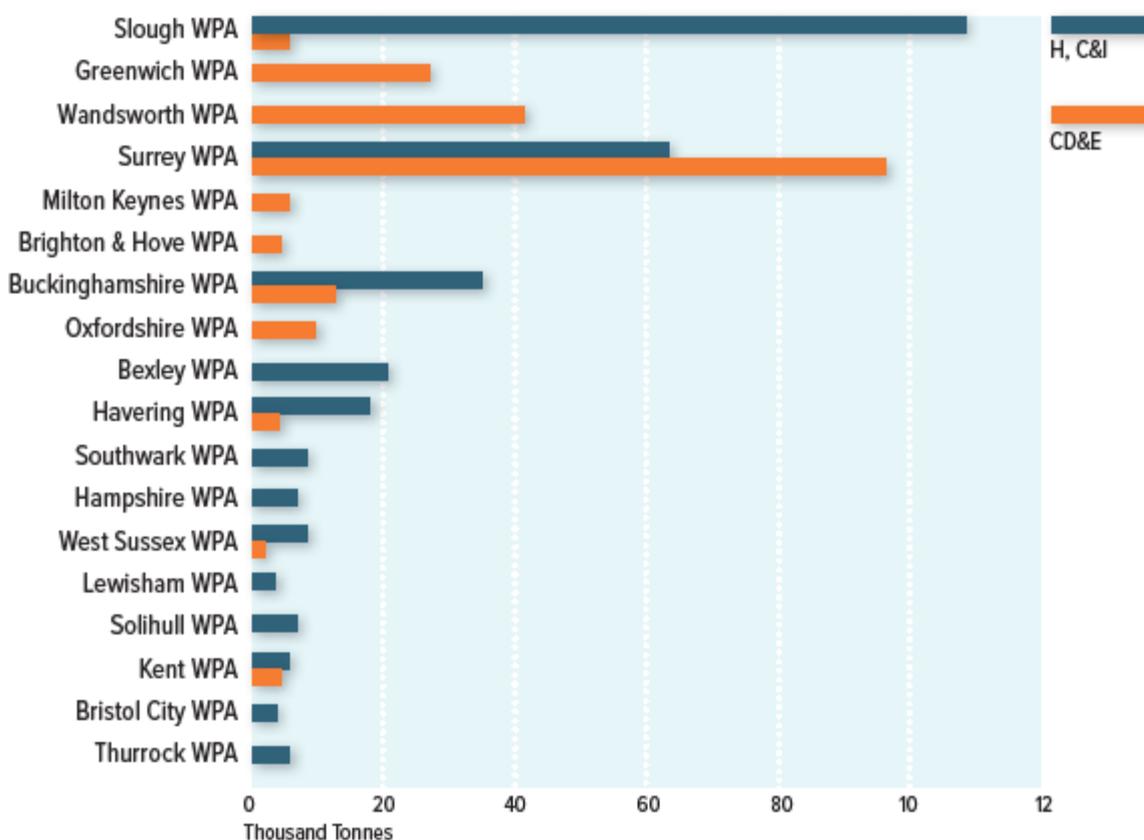
Key Issue 1 Cross Boundary Issues

- 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.



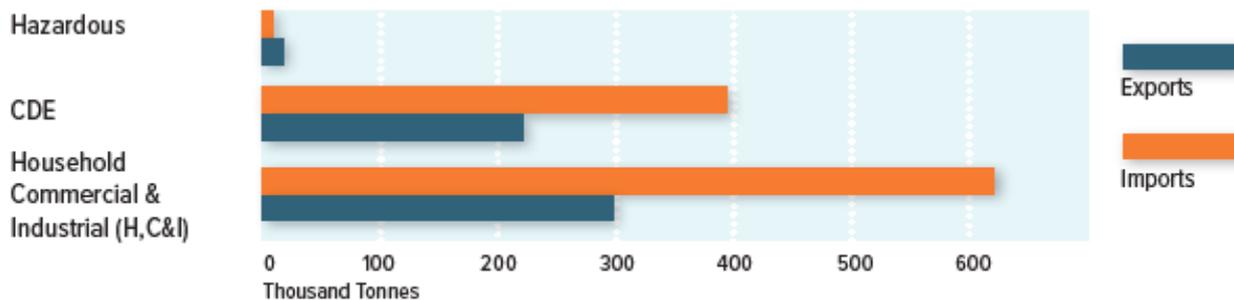
- 3.6 The Mayor’s London Plan considers waste arising from households, businesses and other sources within London’s boundaries and apportions an amount of this waste for each London borough to manage. However, different types of waste are managed in different facilities which often need a wide catchment 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 South London Waste Plan 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 Waste Planning Authority, 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)



3.9 Although it initially appears from the data that the South London Waste Plan 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 South London Waste Plan boroughs themselves.

Figure 4 Origin of South London Waste Plan Imports of Household, Commercial & Industrial Waste (HC&I) in 2017 (tonnage percentage)

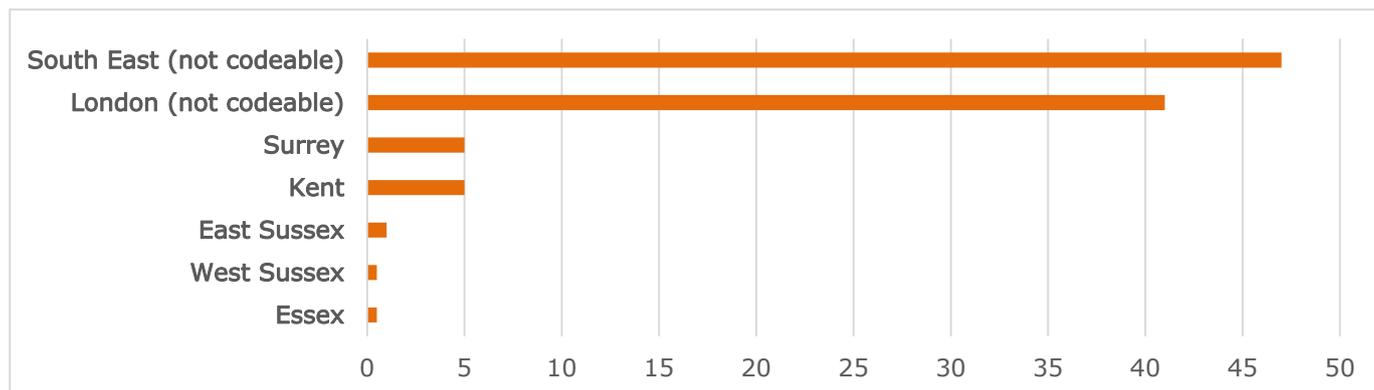
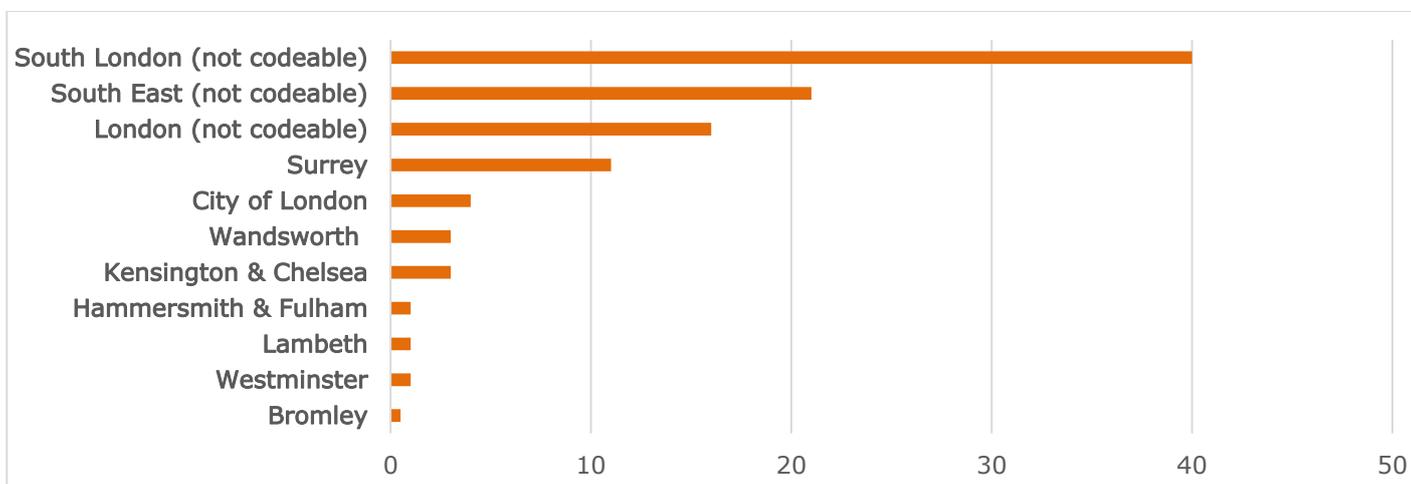
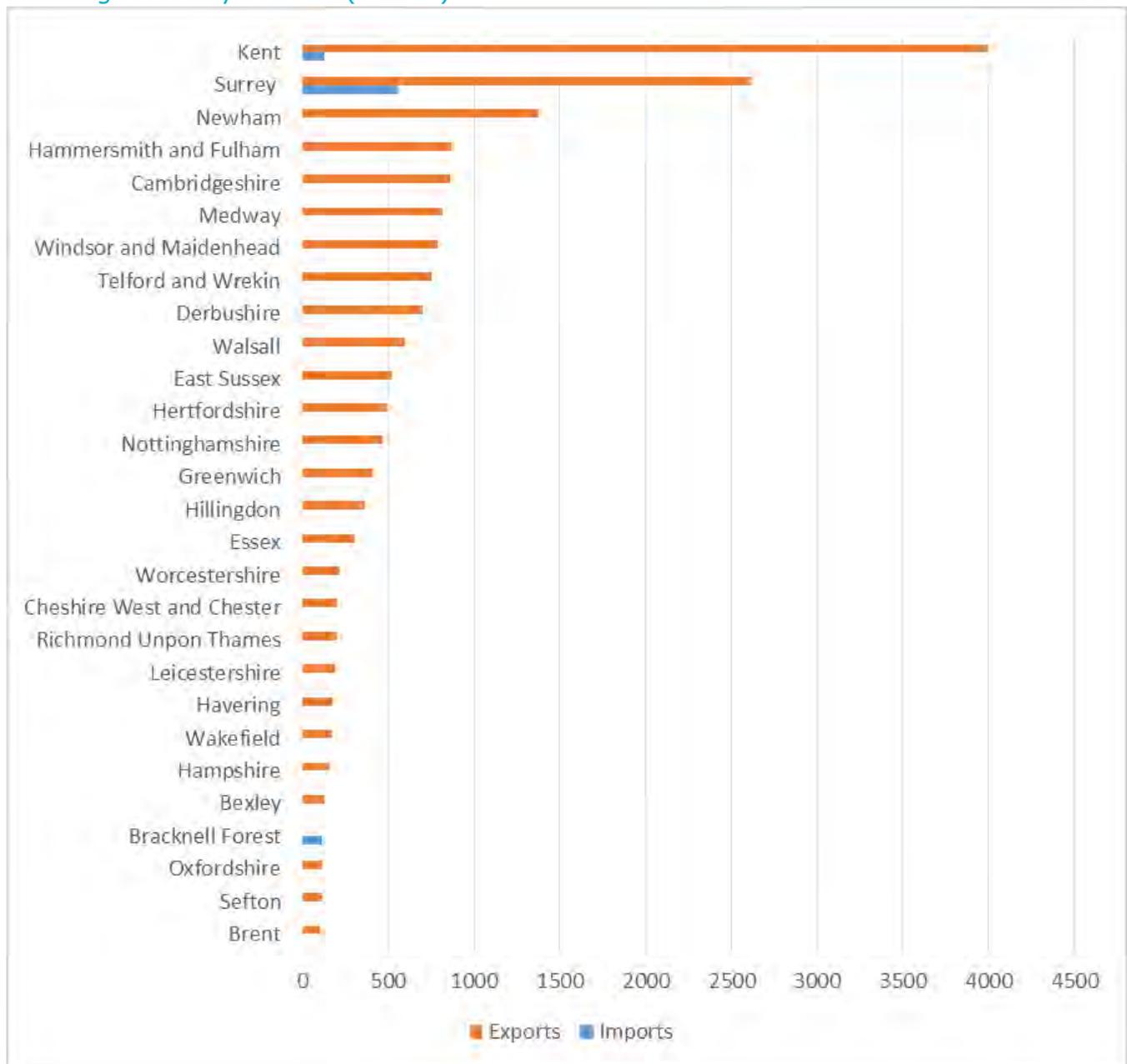


Figure 5 Origin of South London Waste Plan Imports of Construction, Demolition & Excavation Waste C, D&E in 2017 (tonnage percentage)



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 South London Waste Plan area 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 was 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. The achievement of this task can be seen in the Statements of Cooperation which accompany this plan.

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

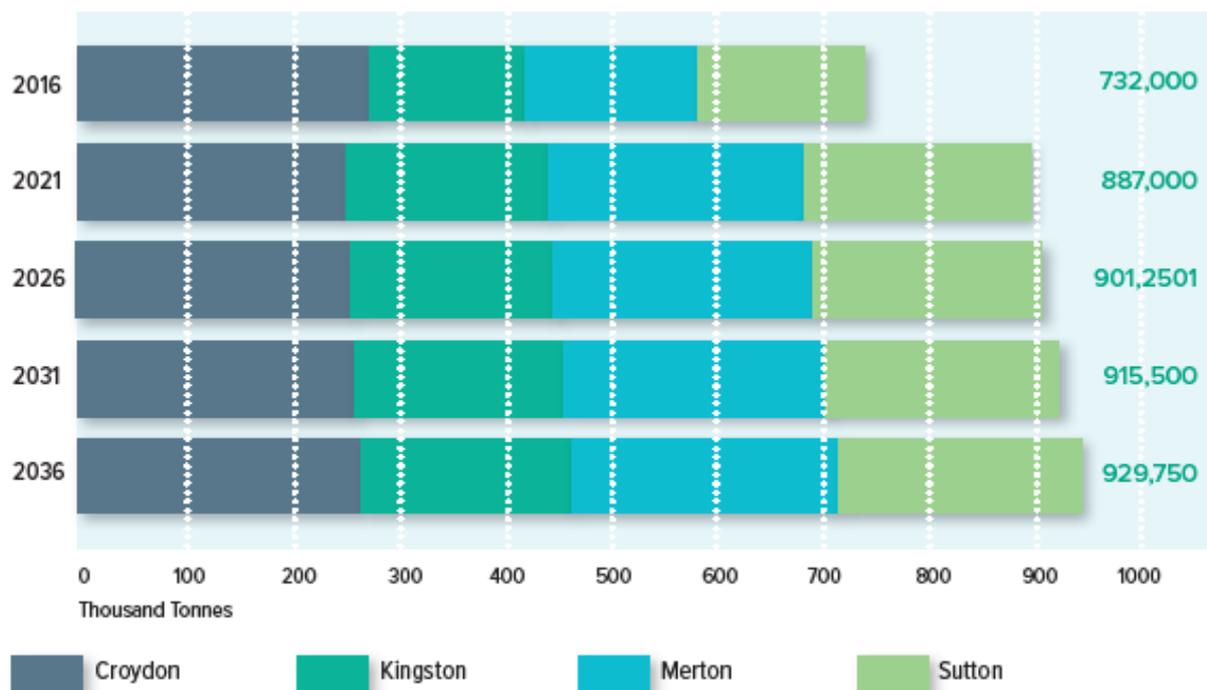
3.12 The National Planning Policy for Waste and the associated guidance requires waste planning authorities to plan for seven waste streams:

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.

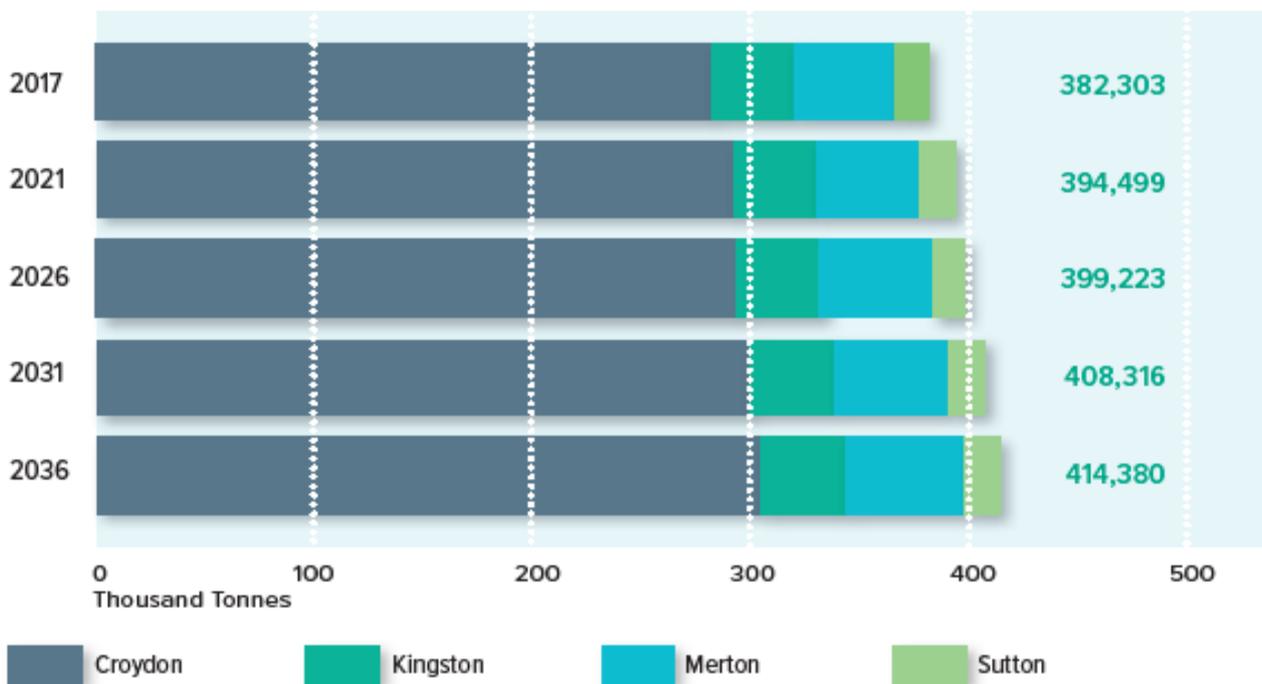
3.15 These two waste streams are collectively the largest amount of waste produced in the South London Waste Plan area; both make up the 2020 London Plan apportionment targets. Most of the boroughs within the South London Waste Plan area have been set apportionment targets higher than their anticipated waste arisings and collectively the apportionment is higher than the anticipated arisings. The 2019 South London Waste Plan Technical Report has therefore used the higher 2020 London Plan apportionment targets for each South London Waste Plan 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 Waste Plan boroughs was to provide sufficient capacity for those waste streams which will need additional capacity to meet their 2036 target. This task has been achieved through Policies WP1, WP2 and WP3.

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 All South London Waste Plan boroughs are set to see a substantial increase in house-building following the adoption of the 2020 London Plan. The four boroughs are expected to deliver 4,430 new homes per year – an increase of 55% on their previous target – 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 protection from development, and 33% of Merton is protected green space, such as Wimbledon and Mitcham Commons.
- 3.21 Besides 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. The 2017 London Industrial Land Demand Study (CAG Consultants for the GLA, Figure 13.3) identified that in the four boroughs the potential loss of industrial land was virtually negated by requirements for warehousing and other types of industry. The vacant land that was identified is necessary for churn and a functioning land market. In the context of scarce land, it is necessary to plan sufficiently for waste but not sterilise industrial land for other uses by applying waste designations too widely.
- 3.22 Over the past decade, the South London Waste Plan boroughs have worked together on the South London Waste Plan 2011-2021. During these ten years, sites for waste management have been delivered in accordance with the plan. 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. The task for the South London Waste Plan boroughs was to provide sufficient management capacity for waste uses but ensure that they do not stifle other land uses with high land demand. This task has been achieved through policies WP1, WP2, WP3 and WP4.



Key Issue 4: Waste Transfer Facilities



3.23 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.

3.24 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples include the transfer of hazardous waste to specialist treatment facilities in Cambridgeshire & Peterborough or the importation of household, commercial and industrial waste from Kent. 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.

3.25 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 practice 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.

3.26 The task for the South London Waste Plan boroughs was to encourage more reuse and recycling on waste transfer stations. This task has been achieved through Policy WP4.

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

- 3.27 As started by the South London Waste Plan 2011, the South London Waste Plan will reduce the reliance on disposal to landfill sites both within the plan area and outside London. Therefore, this South London Waste Plan will:
- 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.
- 3.28 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 2020 London Plan requires major development, such as new waste facilities, to be net zero carbon and this is a key issue for the South London Waste Plan.
- 3.29 The South London Waste Plan boroughs support the 2019 Mayor's Environment Strategy 2019 and 2020 London Plan proposals to move towards a circular economy, to keep products and materials circulating within the economy at their highest value for as long as possible. Leasing, sharing, reusing, repairing and re-manufacturing 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 already 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 and demolition waste and the establishment of repair facilities, usually in vacant retail units rather than on waste sites themselves.
- 3.30 The tasks for the South London Waste Plan boroughs was 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. This task has been achieved through policies WP3, WP6 and WP7.





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 with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met.

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. 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.

4.2 To achieve this vision, the South London Waste Plan has the following objectives:

- **Objective 1:** Meet the 2020 London Plan target for Household and Commercial and Industrial Waste
- **Objective 2:** Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary
- **Objective 3:** Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan
- **Objective 4:** Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates
- **Objective 5:** Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity
- **Objective 6:** Ensure the effects of new development are mitigated and, where possible, enhance amenity





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 2020 London Plan waste arisings and apportionment targets as these are the most up-to-date targets. The Mayor calculates 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.

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 | 174,000 | 238,000 | 180,000 | 249,250 |
| Sutton | 161,000 | 211,000 | 168,000 | 220,500 |
| TOTAL | 792,000 | 888,000 | 825,000 | 929,750 |

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 2 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

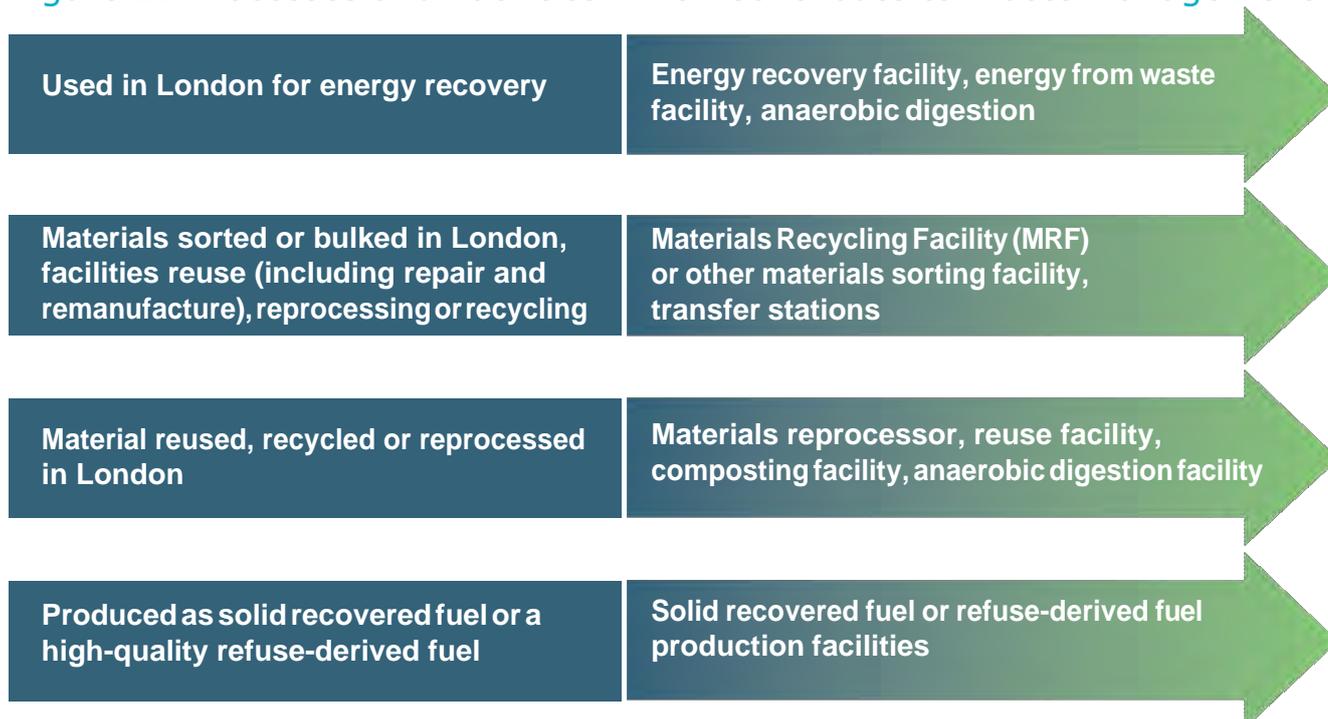
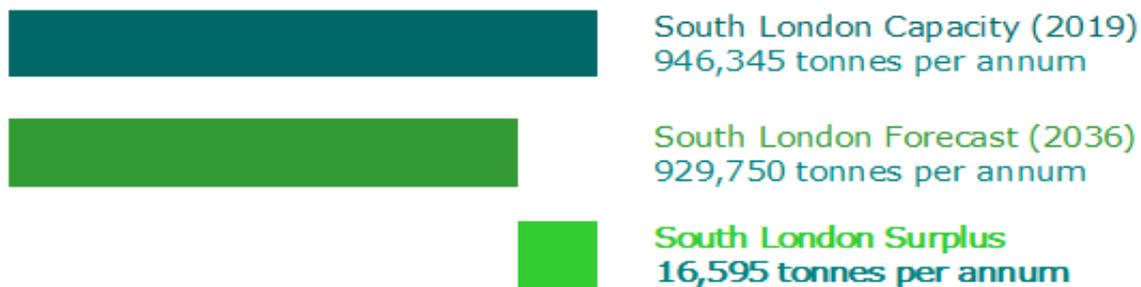


Figure 13 Capacity, Forecast and Surplus for Household and Commercial & Industrial Waste



5.7 Appendix 2 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.

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, which by virtue of having a planning permission and operating are available, viable and suitable, 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 2020 London Plan apportionment targets and this plan's objectives:

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

- (a) 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.
- (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 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.
- (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).
- (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).

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, Excavation 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. 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.

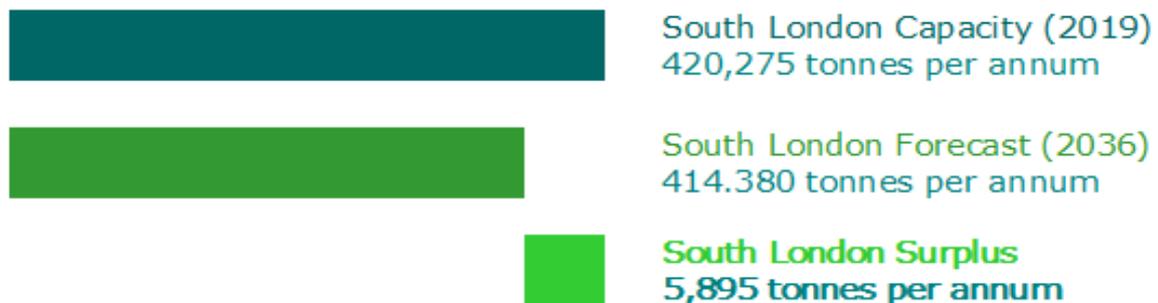
Figure 14 Construction and Demolition Waste Arisings and at 2021 and 2036 (tonnes per annum)



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

5.12 Appendix 2 shows the existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and it shows there is a small surplus for the 2036 forecast. The exact figures are set out in Figure 15.

Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste



- 5.13 The South London Waste Plan boroughs consider that there is considerable scope for the intensification of Construction and Demolition sites and those with potential for intensification are set out in the sites section of the document and Appendix 2.

Excavation Waste

- 5.14 Excavation waste is defined as “naturally occurring soil, stone, rock and similar materials (whether clean or contaminated) as a result of site preparation activities” (Survey of Arisings and Use of Alternatives to Primary Aggregates in England: C, D&E Waste, DCLG, 2005). The 2020 London Plan does not expect the capital to be net self-sufficient in excavation waste as “the particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision to apply net self-sufficiency to this waste stream” (paragraph 9.8.1). Instead, 2020 London Plan expects 95% of excavation waste to go to beneficial use (see the Glossary for the definition of beneficial uses)
- 5.15 In practice, it is very difficult to plan for excavation waste as (1) sites come and go as they develop a need for excavation waste and then are filled, for example the Chessington Equestrian Centre in Kingston; (2) landfill come on and off stream as they are filled; (3) increased construction and demolition waste recycling means less construction and demolition waste going to landfill and so landfills are filling more slowly; (4) increased economic activity leads to greater excavation waste and landfills filling more quickly.
- 5.16 The South East Planning Advisory Group’s Joint Position Statement on the Deposit of Land in the South East of England (2019) states: “the export of such waste [from London] for management within the South East will continue for the foreseeable future [and] inert waste arising on London can be used to restore mineral workings in the South East of England.” Therefore, the South London Waste Plan boroughs do not intend to make provision for such waste but would support an appropriate temporary site within the South London Waste Plan area for excavation waste should a proposal arise.





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. Therefore, in terms of

tonnage, this waste stream has already been accounted for in the household, commercial and industrial and construction and demolition totals but its requirement for specialist facilities has not. Given that the waste generation in South London is small, its projected increase is small, its tonnage is already accounted for and that the small quantity of waste is already being managed by identified specialist facilities, there is no requirement on the South London Waste Plan boroughs to provide any hazardous waste treatment facilities.

Figure 16 Hazardous Waste Arisings at 2021 and 2036 (tonnes per annum)



| | 2021 Arisings | 2036 Arisings |
|--------------|------------------|------------------|
| Croydon | 9,008 | 9,193 |
| Kingston | 2,404 | 2,432 |
| Merton | 4,591 | 4,685 |
| Sutton | 5,239 | 5,303 |
| TOTAL | 21,242 | 21,612 |

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 17 Wastewater and Sludge Generation at 2020 and 2035



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

- 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 2020 London Plan and this plan's objectives:



WP2 Strategic Approach to Other Forms of Waste

- (a) 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.
- (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the forecast arisings for Construction and Demolition waste of managing 420,275 tonnes 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 the intensification of these sites as appropriate (see Policy WP3)
- (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5
- (d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.
- (e) 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 and the relevant borough's Development Plan.

WP3 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 44-91, for waste uses and these will be shown on the boroughs' Policies Map.

Intensification on Safeguarded Sites

5.24 In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. 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 2020 London Plan 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). The evidence base supporting the economic policies in the 2020 London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses. Due to this the evidence also indicates that Croydon, Kingston and Merton should not release industrial land and that Sutton should provide more industrial capacity. As South London is already providing 13% more waste management capacity than waste arising in the south London area, the South London Boroughs have to carefully consider the balance of demand for further waste uses with the demand for other business and industrial enterprises to ensure a diverse and robust business base.

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 by intensification.

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



WP3 Existing Waste Sites

Safeguarding

(a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral 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. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.

(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.

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 2020 London Plan 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.



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

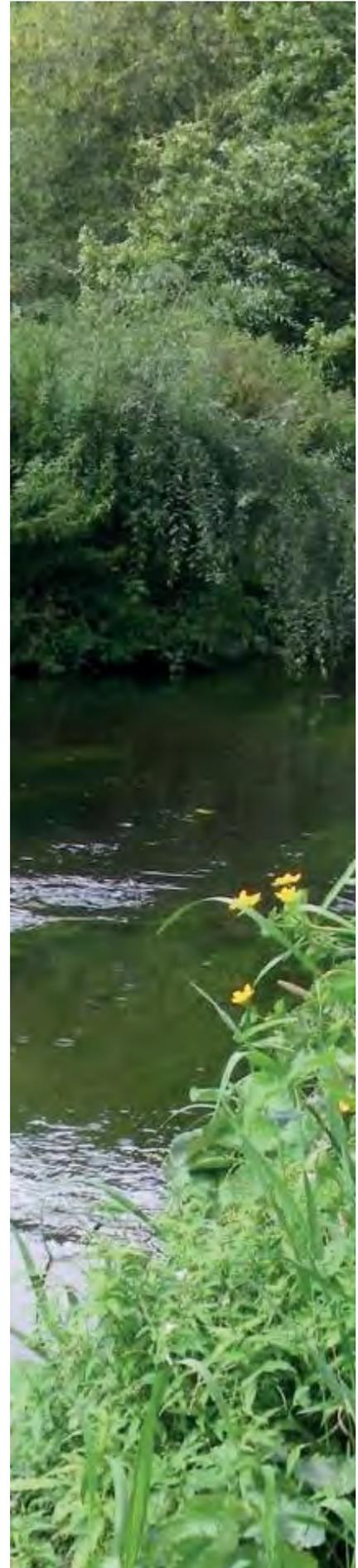
- (a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.
- (b) The parts of a waste facility site where unloading, loading, 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 and the possibility of using sustainable modes of transport for incoming and outgoing materials;
 - (viii) The safety and security of the site
 - (ix) Odour, litter, vermin and birds; and,
 - (x) 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.



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 BREEAM and/or CEEQUAL assessment, a 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 identifying nuisances (eg odours, dust and fumes) likely to affect nearby receptors 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 2020 London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change.
- 5.37 In terms of standards, the Building Research Establishment (BRE) has two standards for rating the overall environmental and sustainability performance of non-residential developments: (1) BREEAM for non-residential buildings; and (2) CEEQUAL for infrastructure projects. In both cases, developments are rated: Outstanding, Excellent, Very Good, Good, Pass and Unclassified. Developers should consider their development and choose the most appropriate standard(s) for their proposed development or whether both are required. If developers use BREEAM, there is no specific scheme for waste facilities, in which developers should liaise with the BRE to identify a suitable 'bespoke' BREEAM scheme to suit the particular characteristics of the proposed development. If developers use CEEQUAL, they should be able to use the general CEEQUAL assessment. In both standards, a rating of Excellent should be achievable.
- 5.38 The reduction of carbon emissions is a key element of both schemes and, in this respect, the 2020 London Plan 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 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 minimising of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly.
 - **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.
 - **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 2020 London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:

WP6 Sustainable Construction and Design of Waste Facilities

- (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL 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 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 line with 2020 London Plan Policy SI2;
 - (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6 , particularly with regard to increased flood risk, 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 2020 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 waste on site;
- and,
- (vi) protect, manage and enhance local habitats and biodiversity.

WP7 The Benefits of Waste



5.42 The 2008 Climate Change Act (as amended) sets a target to make UK net zero carbon by 2050. In addition to societal changes, waste facilities 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 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 2020 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.

WP8 Nearby New Development Affecting Waste Sites

- 5.47 All existing waste sites have strict controls imposed on them whether it be through planning conditions or the Environment Agency permitting regime. However, as an industrial activity, they have the potential to do some harm to sensitive land uses located near to them. Consequently, there is the issue of who has the responsibility of mitigating the impact of nuisances: The existing waste site or a new, proposed sensitive land use, such as residential development.
- 5.48 The National Planning Policy Framework (paragraph 182) and the 2020 London Plan (Policy D13) make it clear that where the operation of an existing business could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or agent of change) should be required to provide suitable mitigation before the completion of the new development.
- 5.49 In the South London Waste Plan area, the conflict between existing waste sites and a proposed, new sensitive land use is unlikely to occur because the existing waste sites are generally in industrial areas and are surrounded by non-sensitive land uses. Nevertheless, the South London Waste Plan boroughs consider, for clarity, a policy setting out who is responsible for the mitigation of any conflict is required.
- 5.50 Therefore, in accordance with the National Planning policy Framework, the 2020 London Plan and this plan's objectives:

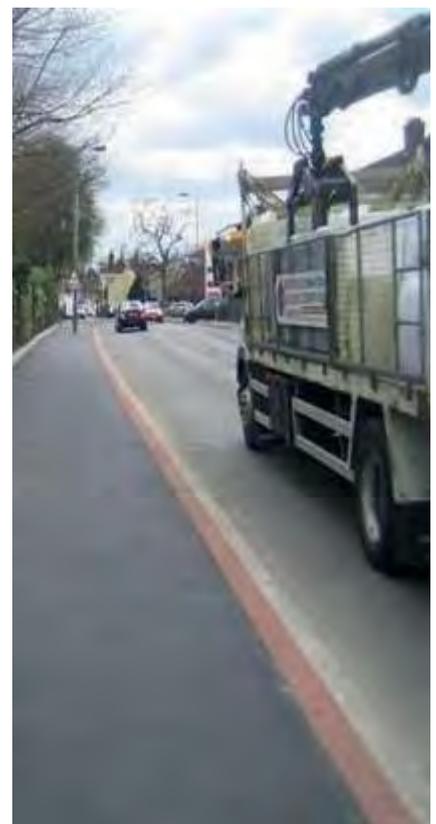
WP8 New Development Affecting Waste Sites

- (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.
- (b) Where new development is proposed that may be affected by an existing waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:
 - (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision
 - (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations



WP9 Planning Obligations

- 5.51 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 policies of the relevant borough.
- 5.52 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; supporting staff to travel sustainably; improving road safety; reducing freight traffic, particularly at peak times
 - 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
 - Provision and management of off-site or advance planting and screening
 - Job brokerage, training and skills to encourage local employment opportunities.
- 5.53 In addition, dependent on the relevant borough's Community Infrastructure Levy (CIL) Charging Schedule, a waste development may be CIL-liable.



WP9 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.

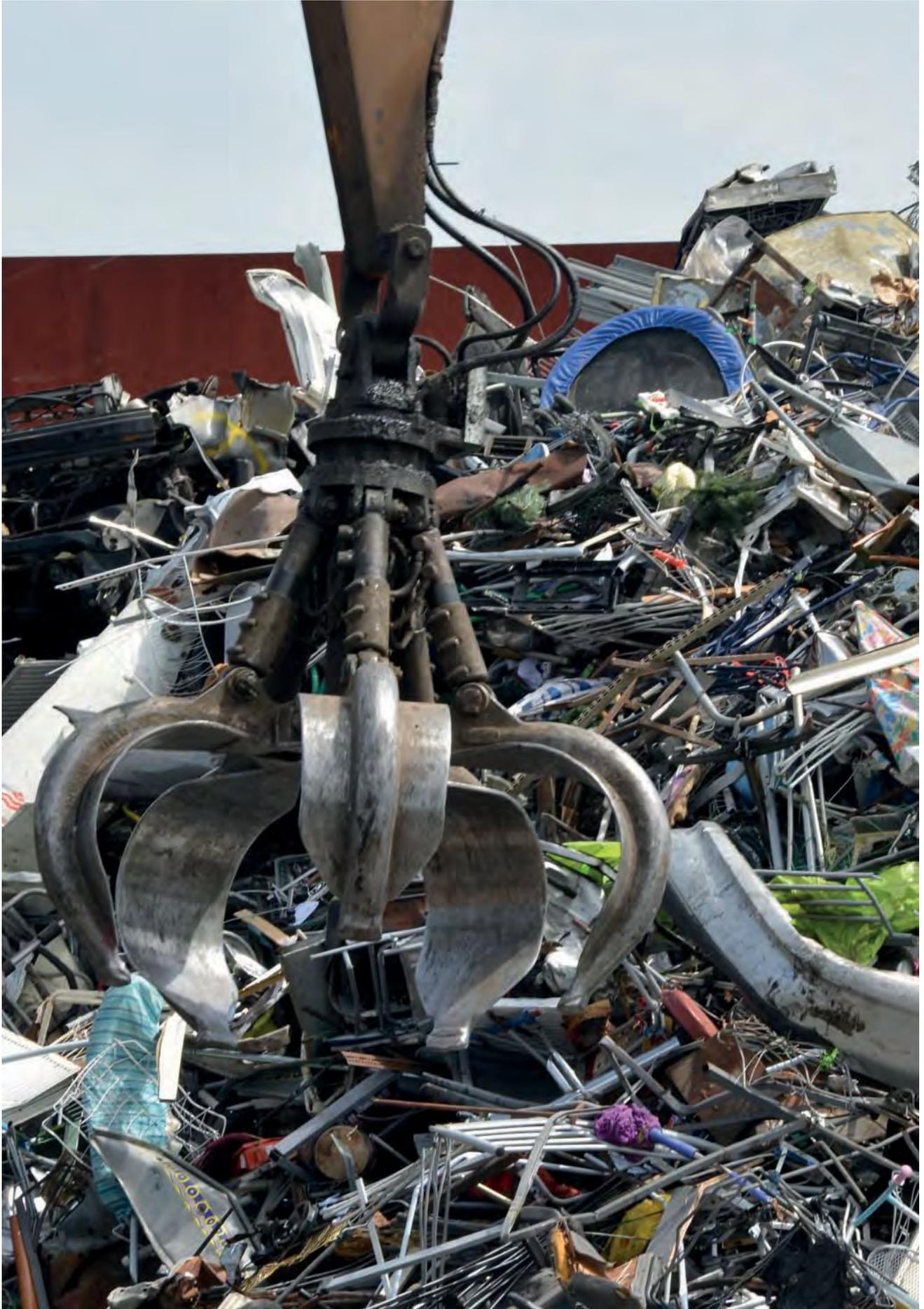
WP10 Monitoring and Contingencies

- 5.54 The South London Waste Plan boroughs recognize that on-going plan monitoring and review are essential to:
- delivering the objectives of the plan
 - assessing the implementation of the strategic policies
 - analysing the effectiveness of policies
- 5.55 In order to ensure plan monitoring is carried out comprehensively, the South London Waste Plan boroughs have created a Monitoring and Contingency Table (Appendix 1) which will measure the progress being made in meeting the strategic objectives. The reporting of the indicators and targets in the Monitoring and Contingencies Table will take place through the London Borough of Sutton's Authority Monitoring Report which is produced annually.
- 5.56 In order to ensure the South London Waste Plan is flexible and can deal with changing circumstances, the boroughs have identified a number of possible risks and constraints to delivery and has set out contingency plans to address these risks. Monitoring will provide the basis on which a contingency within the South London Waste Plan would be triggered. In any event, Paragraph 33 of the National Planning Policy Framework requires that the plan is reviewed every five years.

WP10 Monitoring and Contingencies

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.





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, **(ii)** commercial and industrial, **(iii)** local authority collected waste, usually a combination of household and commercial and industrial, **(iv)** construction and demolition, **(v)** excavation, **(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 2020 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: If a site was 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
- Conserving, and where possible enhancing, the setting of Airport House, a Grade II* Listed building opposite

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



| | |
|---|--------------------------------------|
| Sitesize (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) | 178,593 |

Not to Scale

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Site Description Rail depot, including railway sidings, aggregates storing, construction and demolition waste recycling plant, concrete batching plant, ancillary office building and enclosed sheds.
The site lies adjacent to Purley rail station and is reasonably isolated from nearby properties

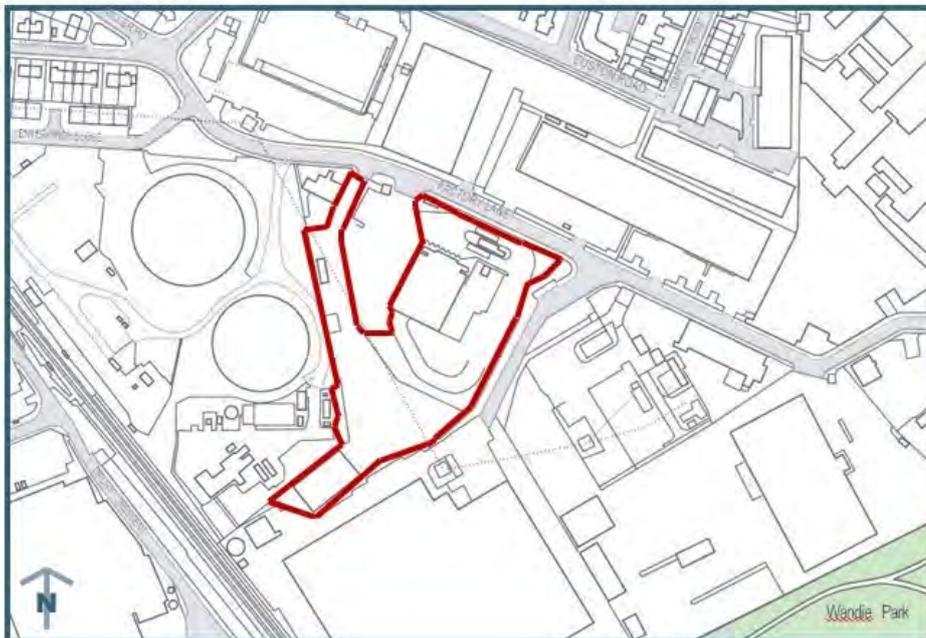
Planning Designations Archaeological Priority Area
Place Specific Policy - Purley District Centre and environs (DM42.1)

Currently Safeguarded No

Opportunity to increase waste managed No. This is a dual-use site, with a minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level.

- 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
 - Not prejudicing the minerals operations on site which are a complementary use

C5A Factory Lane Waste Transfer Station, Factory Lane, Croydon CR0 3RL



Not to Scale

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| | |
|---|--|
| Site size (ha) | 1.2 |
| 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) | 0 |

Site Description

A large triple-storey building surrounded by hardstanding. The site is part of a larger industrial area.
 The site wraps around a household reuse and recycling centre.
 Active gas holders lie to the north-west of the site and power lines are overhead.
 * Maximum throughput and licensed capacity figures are for both sites C5A and C5B

Planning Designations

Strategic Industrial Location
 Flood Zone 2

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. The site is large and there may be an opportunity to co-locate.

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

C5B Factory Lane Reuse and Recycling Centre, Factory Lane, Croydon CR0 3RL



| | |
|---|--|
| 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) | 19,736* |
| Licensed capacity (tpa) | 200,000* |
| Qualifying throughput (tpa) | 9,623 (HCI) 5,206 (C&D) |

Not to Scale

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Site Description Open local authority reuse and recycling centre. The site is part of a larger industrial area. A waste transfer site wraps around the household reuse and recycling centre. Active gas holders lie to the north-west of the site and power lines are overhead.
* Maximum throughput and licensed capacity figures are for both sites C5A and C5B

Planning Designations Strategic Industrial Location
Flood Zone 2

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.

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

C6 Fishers Farm Reuse and Recycling Centre, 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:

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 Hutchinson’s Bank
 - 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

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



| | |
|---|---|
| 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 |

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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

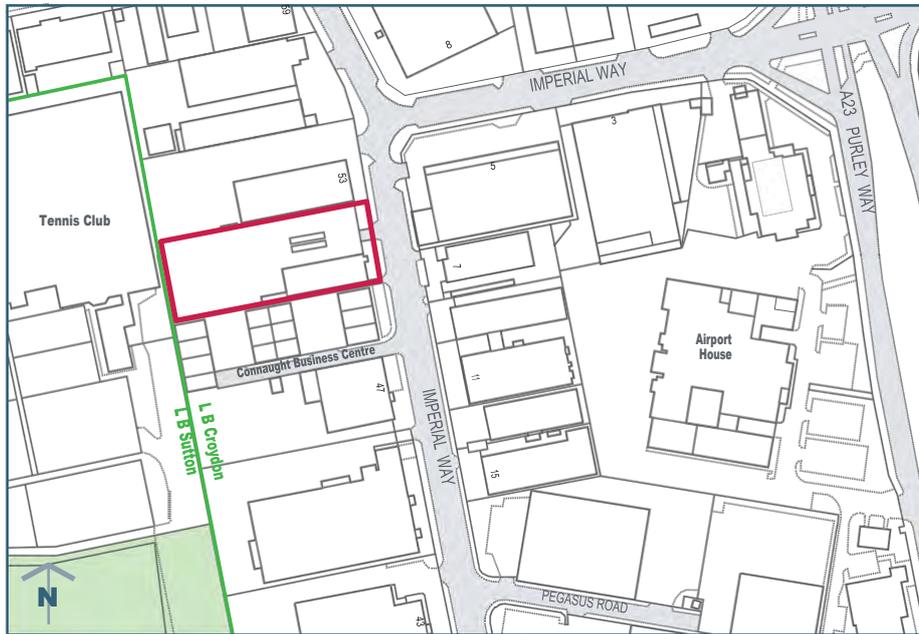
Opportunity to increase waste managed No. This is a very constrained site with no opportunity for expansion or intensification

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
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

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



Not to Scale

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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) |

Site Description Modern double-height warehouse with adjacent hardstanding area for metal sorting. The site lies within the Imperial Way Industrial Estate, which comprises a mix of new and mid-century warehouses, mostly double height.

Planning Designations Strategic Industrial Area
Archaeological Priority Area

Currently Safeguarded No

Opportunity to increase waste managed 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.

- 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 in the archaeological priority area of Mere Bank
 - 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
 - Conserving, and where possible enhancing, the setting of Airport House, a Grade II* Listed building opposite

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 |

| | |
|--|--|
| Site Description | Uncovered sorting facility, skip storage area along with vehicle storage and repair Site is within the Green Belt surrounded by farmland |
| Planning Designations | Green Belt Archaeological Priority Area |
| Currently Safeguarded | Yes - Site reference in SLWP 2011:5 |
| Opportunity to increase waste managed | 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. |
| Issues to consider if there is a further application | <p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> • 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 open spaces • Evaluating and preserving any archaeological remains as the site is in the archaeological priority area - Croydon Downs • Minimising flood risk on- and off-site • 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 Green Belt • Providing appropriate soft landscaping |

C10 Purley Oaks Reuse and Recycling Centre, Brighton Road, Croydon CR8 2BG



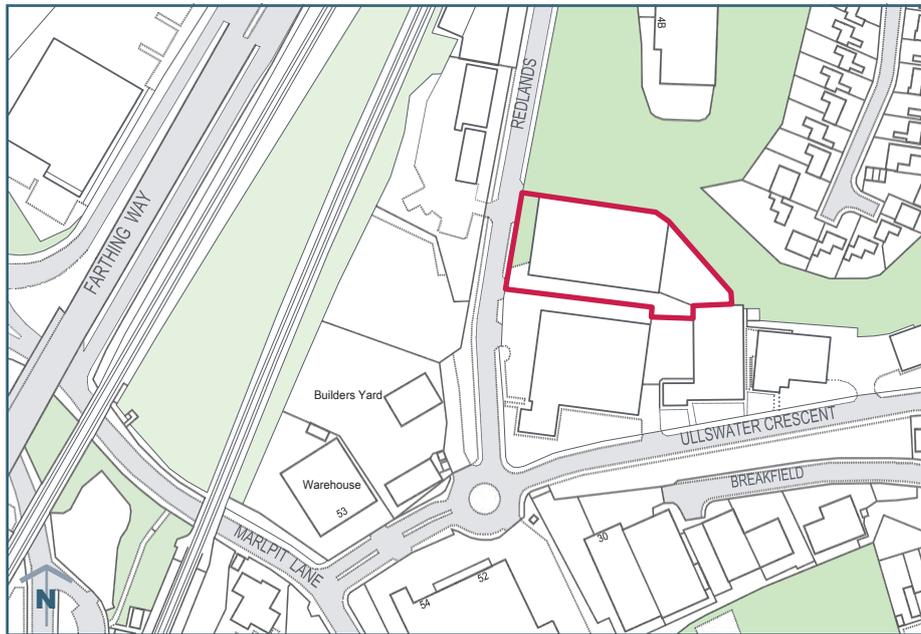
Not to Scale

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| | |
|---|---|
| Site size (ha) | 0.2 |
| Type of facility | Household Waste Amenity Site |
| 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 of the junction of Brighton Road and Purley Downs Road (DM42.3) Archaeological Priority Area Flood Zone 3 |
| 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 | <p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> • 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 • The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018 |

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



| | |
|---|-----------------|
| 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 |

Not to Scale

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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

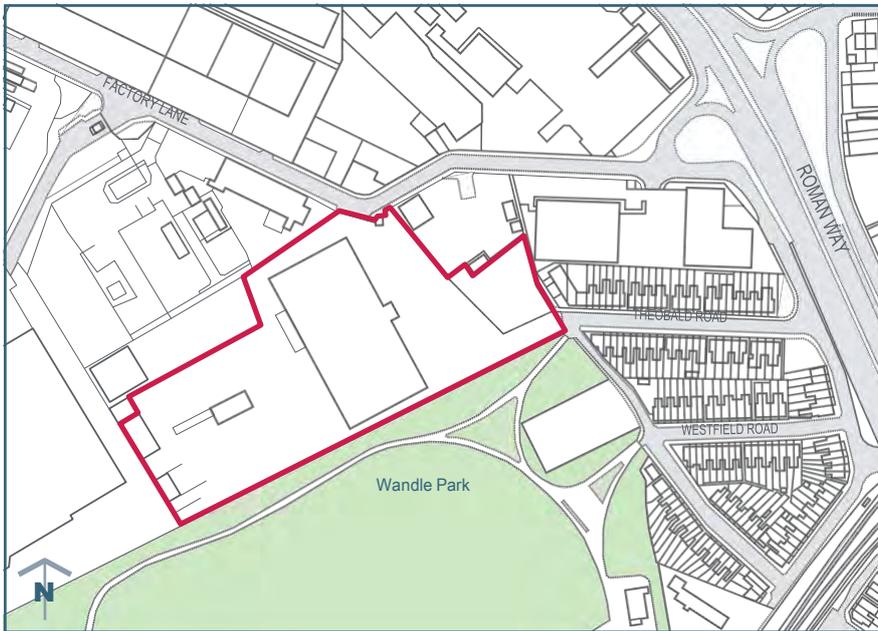
Currently Safeguarded Yes – Site reference in SLWP 2011: A

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

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



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| | |
|---|--|
| Site size (ha) | 2.7 |
| 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
Place Specific Policy – Site Allocations in Waddon (DM49.2)
Flood Zones 2 and 3

Currently Safeguarded

Yes – Site reference in SLWP 2011: B

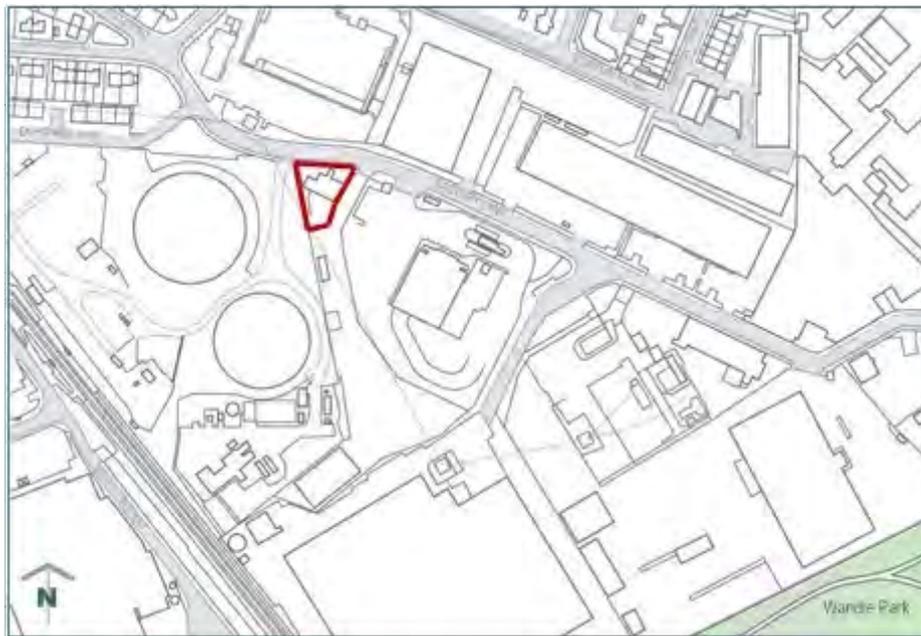
Opportunity to increase waste managed

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:
- Croydon Local Plan site allocation of the site (page 452)
 - 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

C13 Solo Wood, Factory Lane, Croydon CR0 3RL



| | |
|---|--|
| Site size (ha) | .02 |
| Type of facility | Wood Recycling |
| Type of waste | Household, Commercial and Industrial (HCI) |
| Maximum throughput tonnes per annum (tpa) | Unknown |
| Licensed capacity (tpa) | 5,000 |
| Qualifying throughput (tpa) | 5,000 (HCI) |

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Site Description Single-storey building and open storage. The site is part of a larger industrial area. A waste transfer site and a household reuse and recycling centre adjoins the site. Active gas holders lie to the north-west of the site and power lines are overhead.

| | |
|------------------------------|---|
| Planning Designations | Strategic Industrial Location Flood Zone 2 |
| Currently Safeguarded | Yes – Site reference in 2011 SLWP: 1 |

Opportunity to increase waste managed No. The site is small and has little scope for intensification.

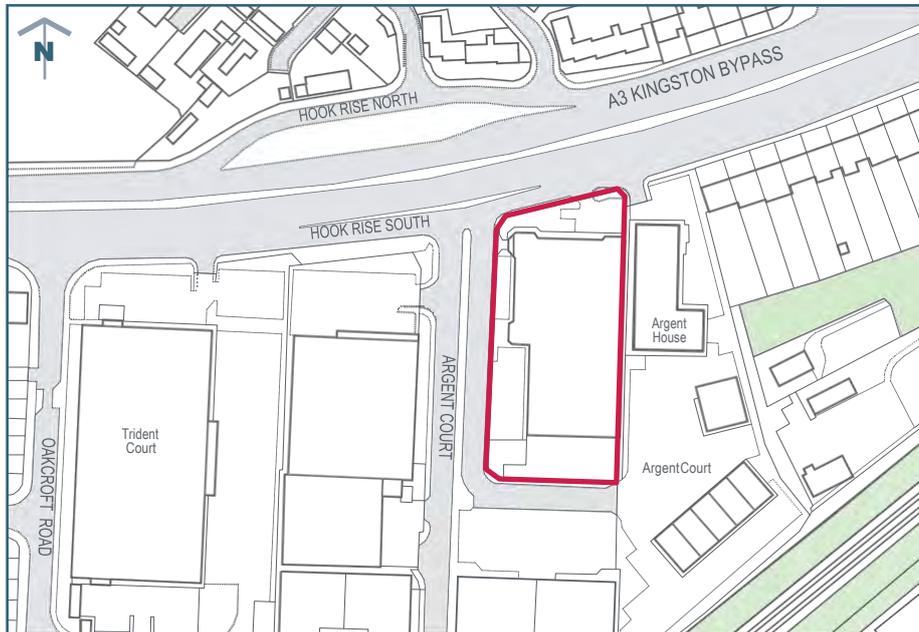
Issues to consider if there is a further application

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
- 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



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

K3 Kingston Reuse and Recycling Centre, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



| | |
|---|--|
| Site size (ha) | 0.7 |
| 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) |

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| | |
|--|--|
| Site Description | 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. |
| Planning Designations | Locally Significant Industrial Site Area of Archaeological Significance |
| Currently Safeguarded | Yes. Site reference in SLWP 2011: 6 |
| 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 | <p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● 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 Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve ● 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 ● Providing appropriate soft landscaping |

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

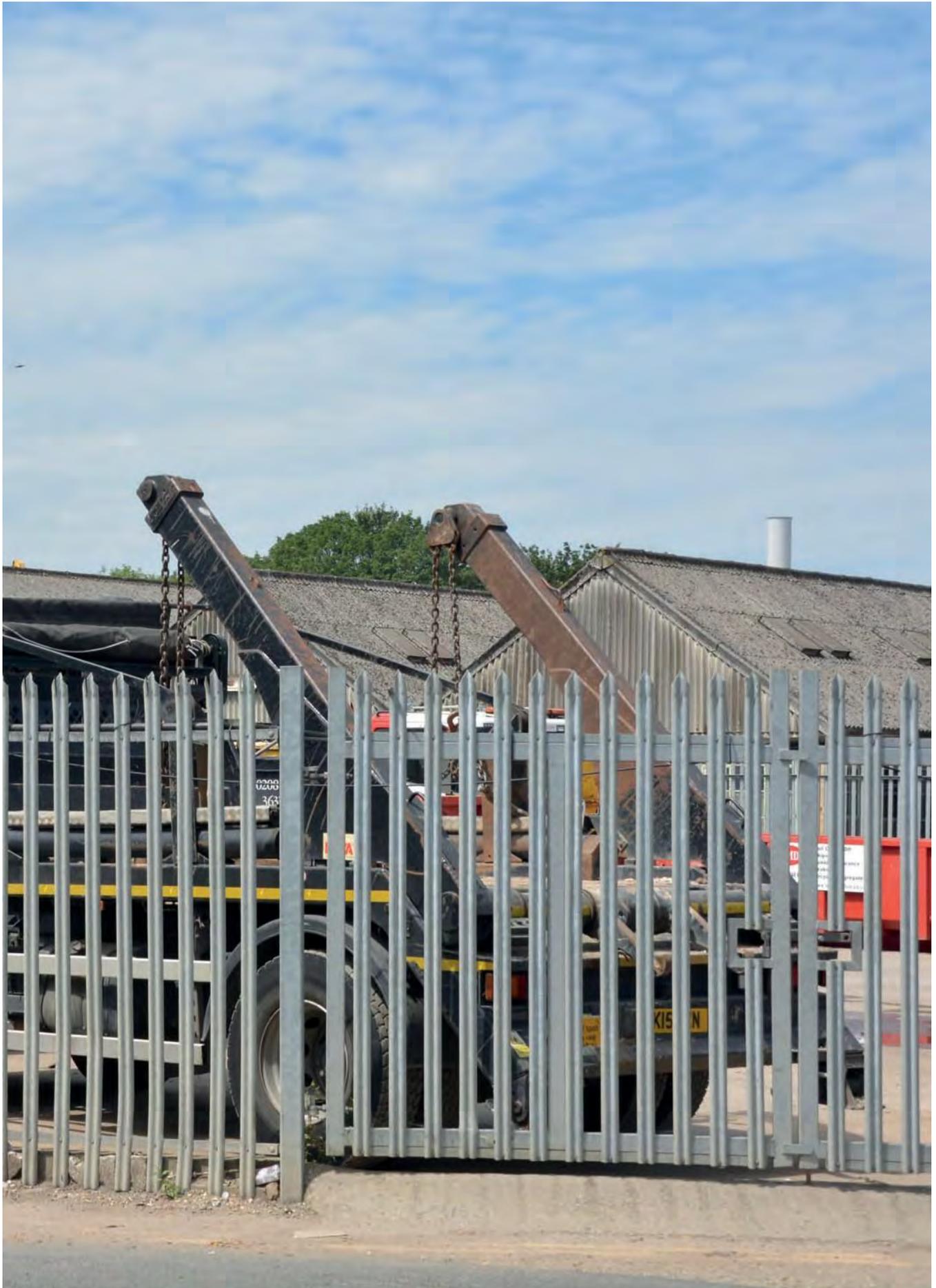


| | |
|---|--|
| Site size (ha) | 1.3 |
| Type of facility | Transfer Station |
| Type of waste | Household, Commercial and Industrial (HCI) |
| Maximum throughput tonnes per annum (tpa) | 68,883 |
| Licensed capacity (tpa) | 200,500 |
| Qualifying throughput (tpa) | 19,620 (HCI) |

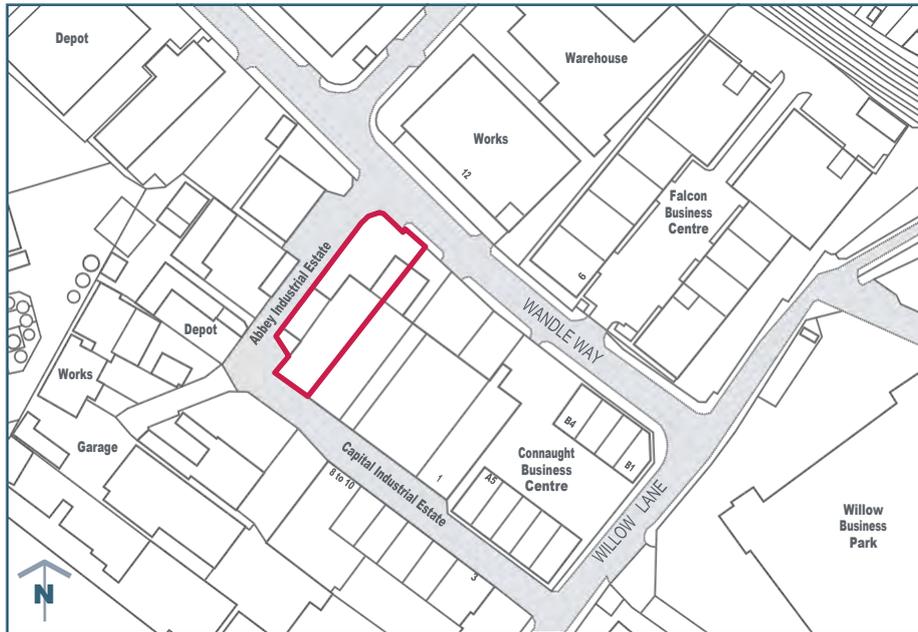
Not to Scale

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| | | |
|--|--|-------------------------------------|
| Site Description | Double-height enclosed shed with hardstanding for vehicles. The site lies within an industrial area which is surrounded by open space. The Kingston Civic Amenity Site is within the same site. | |
| Planning Designations | Locally Significant Industrial Site | Area of Archaeological Significance |
| Currently Safeguarded | No | |
| 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: <ul style="list-style-type: none"> ● 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 Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve ● 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 | |



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



| | |
|---|-----------------------------------|
| Site size (ha) | 0.06 |
| Type of waste | 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 |

Not to Scale

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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

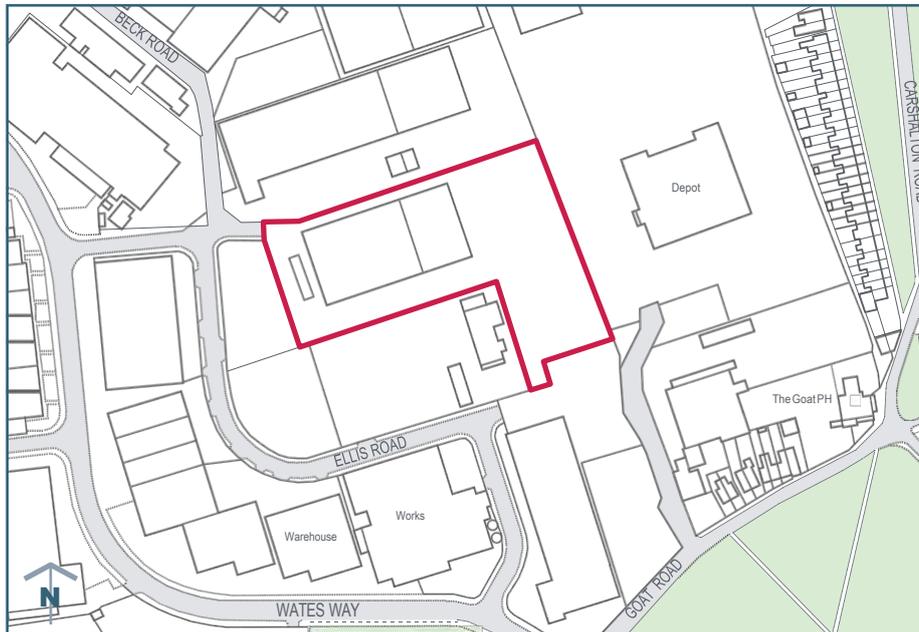
Currently Safeguarded No

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
- Ensuring the safety clearances for the overhead power lines crossing the site are respected

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



| | |
|---|--|
| 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) |

Not to Scale

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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 Priority Zone
 Flood Zone 2

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
 - Ensuring the safety clearances for overhead power lines crossing the site are respected

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



| | |
|---|--|
| 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) |

Not to Scale

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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
Flood Zone 2

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

M4 Garth Road Reuse and Recycling Centre, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



| | |
|---|---------------------------------|
| 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) |

Not to Scale

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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

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) |

Site Description Transfer station
 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
 - Ensuring the safety clearances for the overhead power lines crossing the site are respected

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



| | |
|---|-----------------------------|
| 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 |

Not to Scale

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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

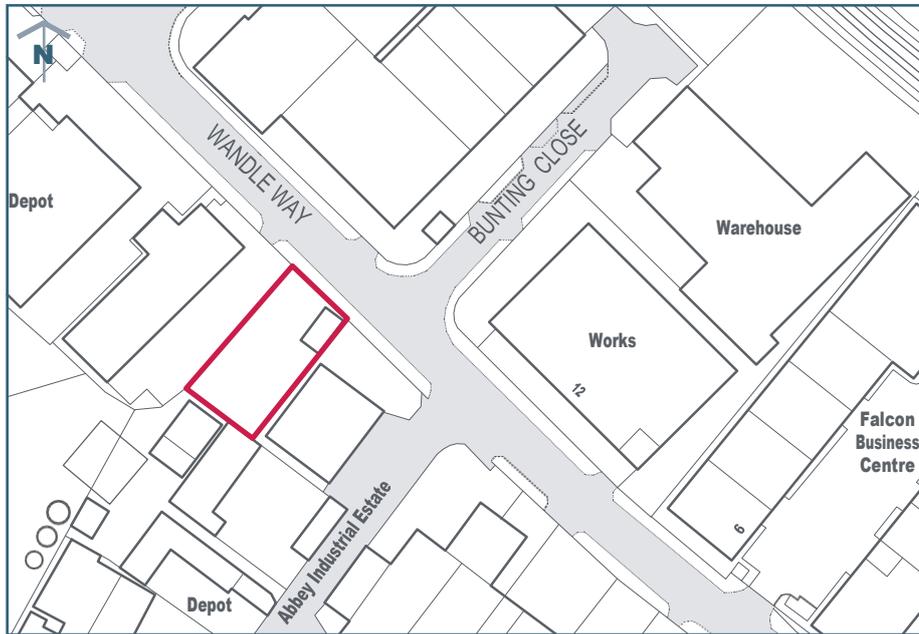
Planning Designations Strategic Industrial Location Archaeological Priority Zone Flood Zone 2

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 there is an 8-metre buffer zone between the top of the riverbank and the edge of the development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

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



| | |
|---|-----------------------------------|
| 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) |

Not to Scale

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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

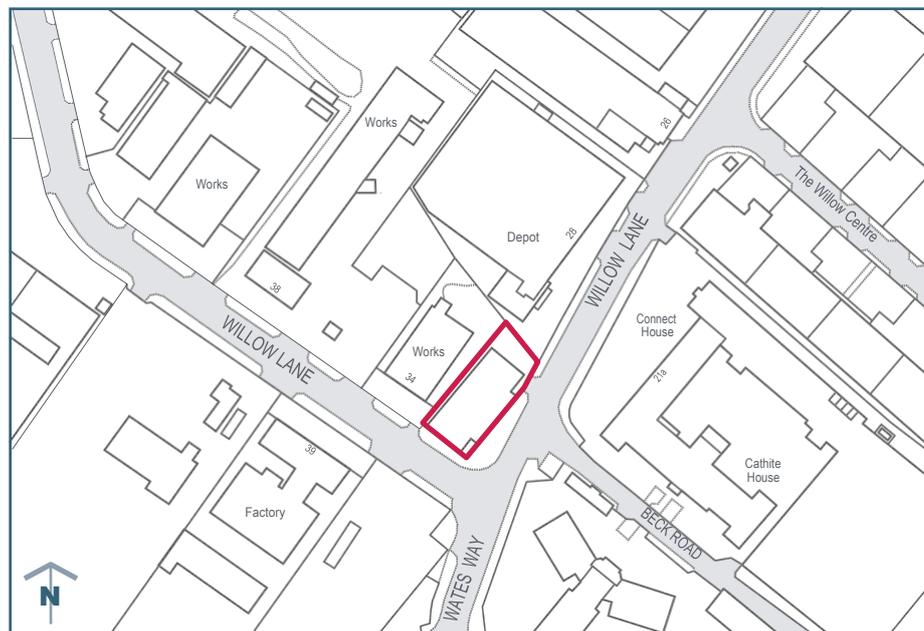
Opportunity to increase waste managed No. It is unlikely that there is an opportunity to intensify operations

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

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



| | |
|---|-----------------------------------|
| 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) |

Not to Scale

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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
 Flood Zone 2

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

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



| | |
|---|-----------------------------------|
| 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 |

Not to Scale

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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

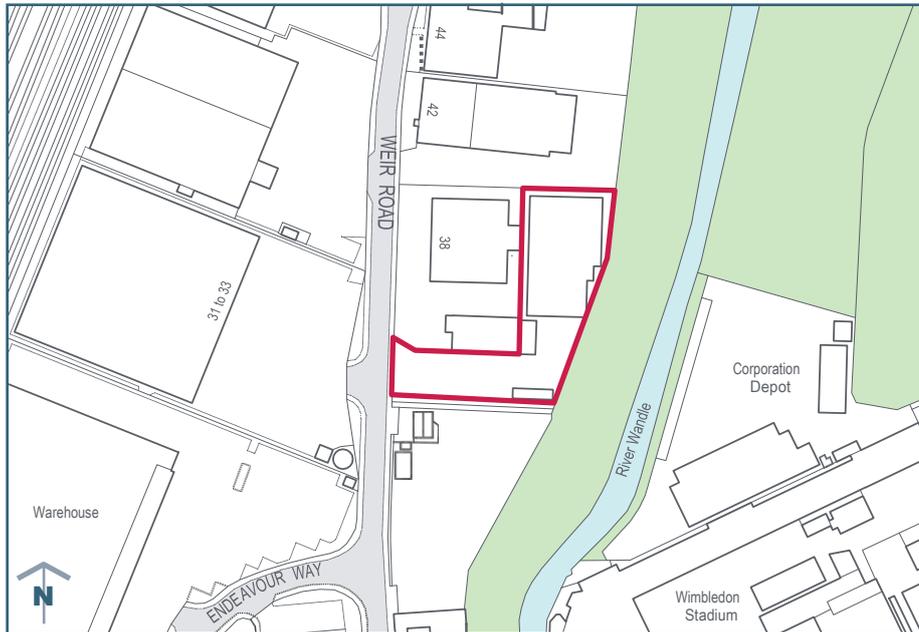
Planning Designations Strategic Industrial Location
Archaeological Priority Zone

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
 - Consulting Transport for London for any impacts on the London Trams Network

M10 Powerday, Weir Court, 36 Weir Road, Merton SW19 8UG



| | |
|---|-----------------------------------|
| 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) |

Not to Scale

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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 there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

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



Not to Scale

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| | |
|---|--|
| 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

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 there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

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



| | |
|---|--|
| 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) |

Not to Scale

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Site Description 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

Planning Designations Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded No

Opportunity to increase waste managed 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

- 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

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: <ul style="list-style-type: none"> ● 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 there is an 8-metre buffer zone between the top of the riverbank and the edge of any development ● Designing a facility that does not impact on the openness of Metropolitan Open Land ● Providing appropriate soft landscaping |

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



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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
 Flood Zone 2

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
 - Ensuring development does not affect adversely the adjacent Wandle Valley Conservation Area
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

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
Flood Zone 2

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
 - Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

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



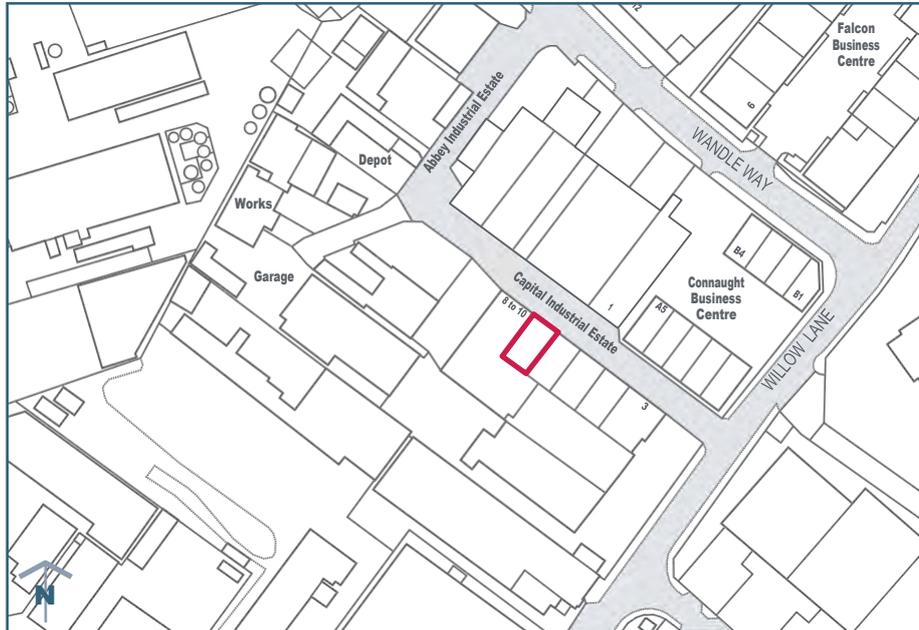
| | |
|---|------------------------------------|
| Site size (ha) | 0.5 |
| Type of facility | Treatment of waste to produce soil |
| Type of waste | Construction and Demolition (C&D) |
| Maximum throughput tonnes per annum (tpa) | 804 |
| Licensed capacity (tpa) | 75,000 |
| Qualifying throughput (tpa)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

Not to Scale

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| | |
|---|---|
| Site Description | <p>A large site comprising a double-height industrial shed with hardstanding for vehicles, hardstanding for skips and construction, demolition and excavation waste</p> <p>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.</p> <p>Connect House, which was converted to residential use through permitted development lies to the north-east of the site</p> |
| Planning Designations | <p>Strategic Industrial Location</p> <p>Archaeological Priority Zone</p> <p>Flood Zone 2</p> |
| 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 | <p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● 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 |

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



| | |
|---|------------------|
| 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 |

Not to Scale

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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 Priority Zone

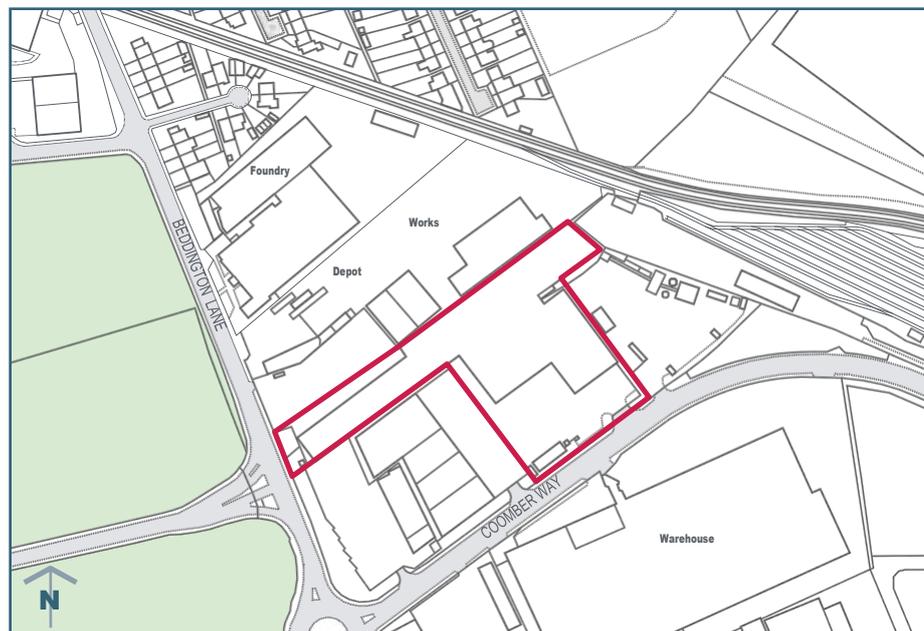
Currently Safeguarded No

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



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



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 No. The site has a current maximum throughput of just under 57,000 tonnes

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
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the nearby underground electricity cable is neither damaged nor made inaccessible

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



| | |
|---|--|
| Site size (ha) | 5.4 |
| 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) |

Not to Scale

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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

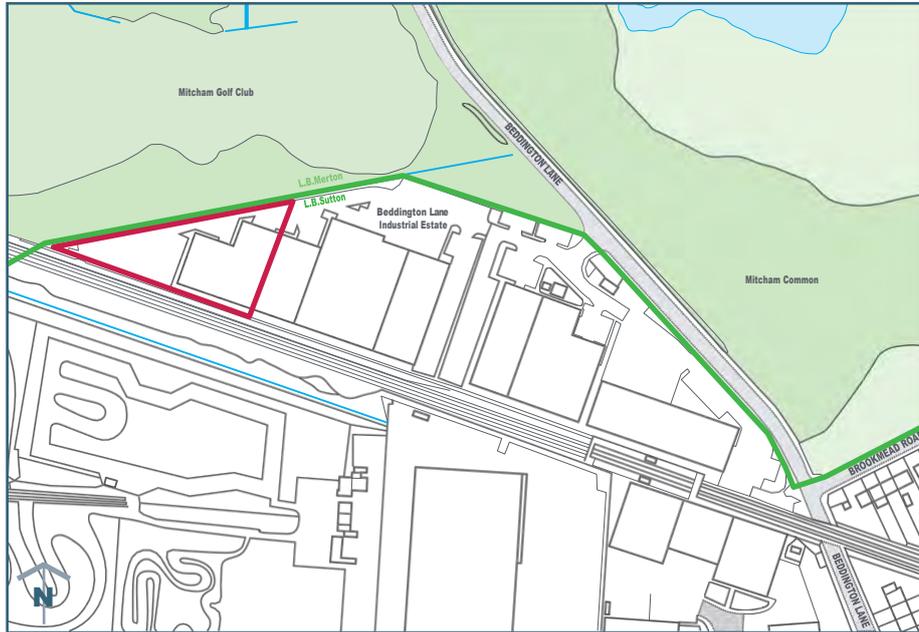
Planning Designations Metropolitan Open Land Metropolitan Green Chain
 Site of Importance for Nature Conservation
 Land safeguarded for the Wandle Valley Regional Park Archaeological Priority Zone

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
 - Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - 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 and providing appropriate soft landscaping
 - Ensuring nearby watercourses are not harmed by the development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Ensuring the safety clearances for the overhead power lines crossing the site are respected

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



| | |
|---|-----------|
| 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 |

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| | |
|---|---|
| Site Description | <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> |
| Planning Designations | <p>Strategic Industrial Location</p> <p>Archaeological Priority Area</p> |
| Currently Safeguarded | No |
| Opportunity to increase waste managed | Yes. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput. |
| Issues to consider if there is a further application | <p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● 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 ● Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads ● 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 and providing appropriate soft landscaping ● Designing a facility that does not impact on the openness of Metropolitan Open Land ● Consulting Transport for London for any impacts on the London Trams Network |

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



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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

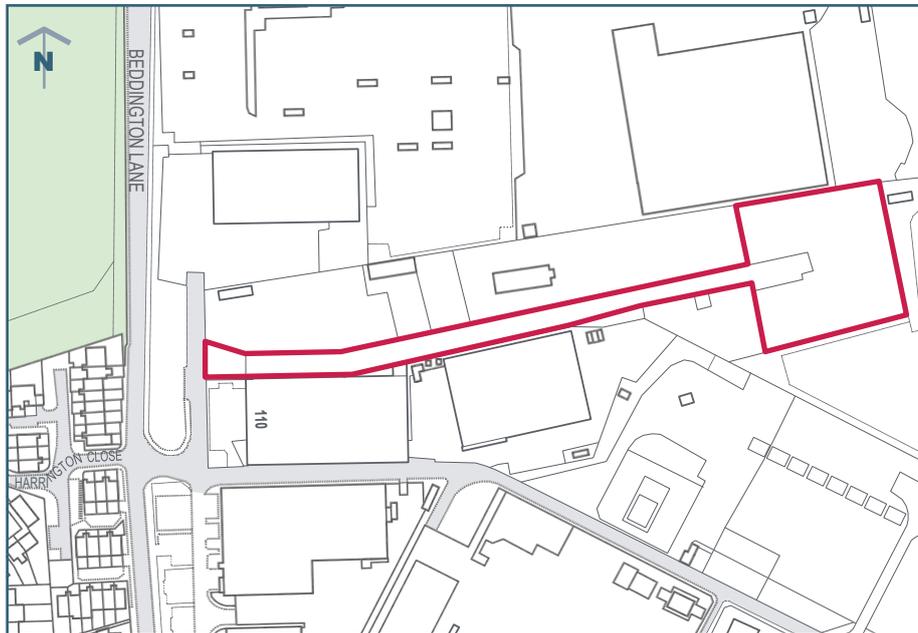
Currently Safeguarded Yes. Site Reference in 2011 SLWP: 98

Opportunity to increase waste managed Yes. The operator has stated it would be possible to intensify operations 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
- Undertaking an assessment on the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

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



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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

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
 Flood Zone 2

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
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Minimising flood risk on- and off-site
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the safety clearances for overhead power lines crossing the site are respected

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



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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

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



| | |
|---|--|
| 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) |

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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
- Ensuring the safety clearance for the overhead power lines crossing the site are respected

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



| | |
|---|-----------------------------------|
| 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) | 1,060 |
| Licensed capacity (tpa) | 74,999 |
| Qualifying throughput (tpa) | 0 |

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Site Description Open site for concrete production and aggregates recovery with a further open yard and warehouse building
 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
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the safety clearances for the overhead power lines crossing the sites are respected

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

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

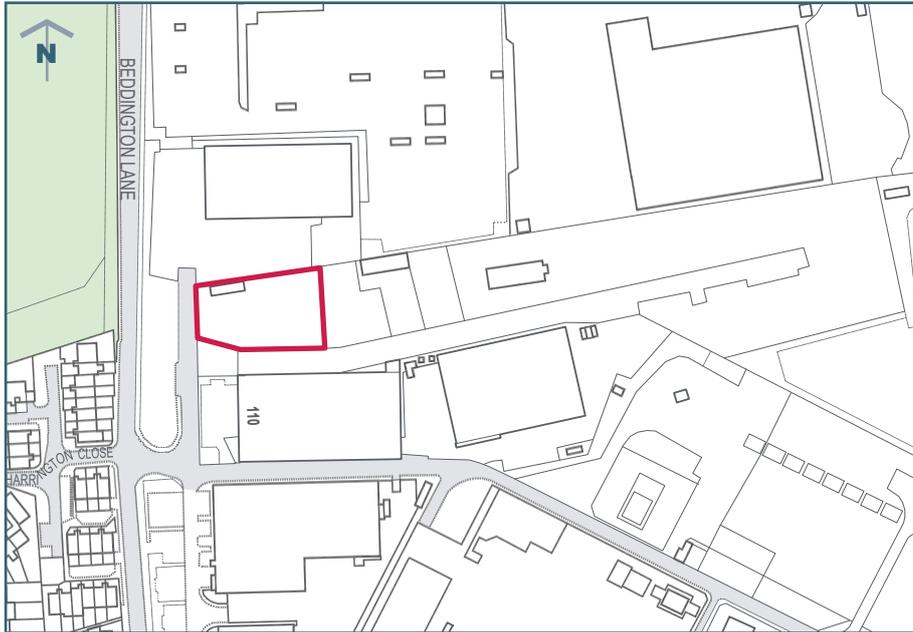
Opportunity to increase waste managed No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

Issues to consider if there is a further application

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

- 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

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) |

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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
 Flood Zone 2

Currently Safeguarded

No

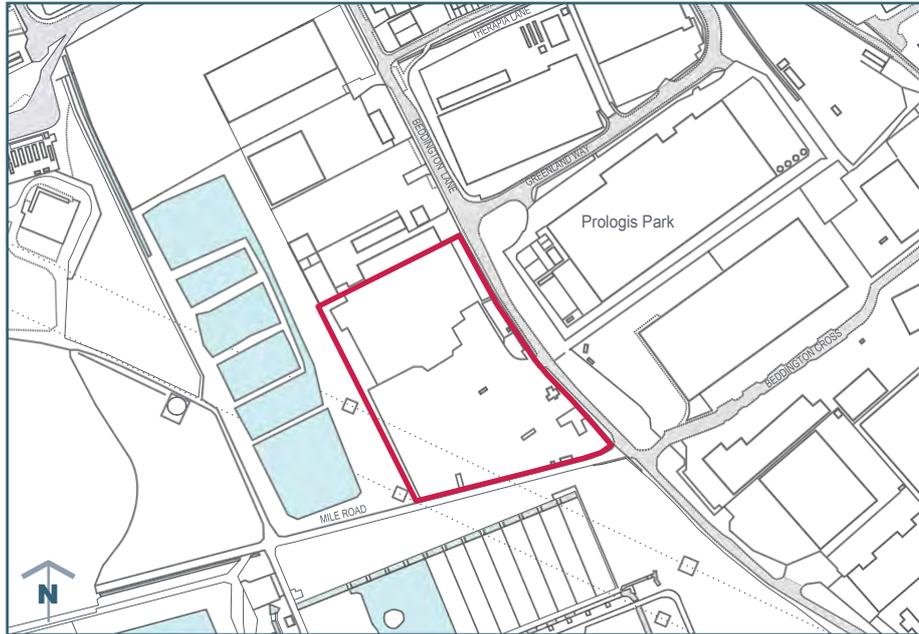
Opportunity to increase waste managed

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

S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH



| | |
|---|---|
| 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) |

Not to Scale

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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
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- 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
- Ensuring the safety clearances for the overhead power lines crossing the site are respected



Appendix 1 Monitoring and Contingencies Table

| Indicator 1 (for Policy WP1) | Household and Commercial and Industrial Waste Managed |
|---------------------------------|--|
| References | Plan Objective :1 SA Objective: 1 |
| Target | By 2036, 929,750 tonnes per annum |
| Monitoring | Monitor annually against target. Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | <p>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify this failure. Possibly revise South London Waste Plan to provide more sites in light of evidence</p> |

| Indicator 2 (for Policy WP2) | Construction and Demolition Waste Managed |
|---------------------------------|--|
| References | Plan Objective :2 SA Objective: 1 |
| Target | By 2036, 414,380 tonnes per annum |
| Monitoring | Monitor annually against target. Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | <p>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify this failure. Possibly revise South London Waste Plan to provide more sites in light of evidence</p> |
| Indicator 3 (for Policy WP2) | Radioactive, Agricultural and Hazardous Waste Treated |
| References | Plan Objective :2 SA Objective: 1 |
| Target | 0 permissions |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | <p>Sites permitted – Analyse the boroughs’ Development Management procedures to identify this failure. Examine whether there is any unidentified need for these streams of waste. Possibly revise South London Waste Plan in light of evidence.</p> |

| Indicator 4 (for Policy WP3 & WP4) | Existing Waste Sites Safeguarded |
|---------------------------------------|---|
| References | Plan Objective :3 SA Objective: 1 |
| Target | 100% of safeguarded existing sites to be operational or to have compensatory provision provided |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | <p>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise South London Waste Plan to provide more sites in light of evidence.</p> |

| Indicator 5 (for Policy WP5(b)) | Compensatory or Intensified Sites with Fully Enclosed Covered Building |
|------------------------------------|---|
| References | Plan Objective :6 SA Objective: 11 |
| Target | 100% of permissions |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | Analyse the boroughs’ Development Management procedures to identify any failure. Examine whether there are specific reasons why sites without a fully enclosed covered building have not been permitted. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence |

| | |
|--|---|
| Indicator 6 (for Policy WP5(c)) | Development on Green Belt, Metropolitan Open Land and Open Space |
| References | Plan Objective :6 SA Objective: 6 |
| Target | 0 ha of development on Green Belt, Metropolitan Open and Open Space |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites on Green Belt, Metropolitan Open and Open Space have been permitted. Possibly revise South London Waste Plan in light of evidence |

| | |
|--|---|
| Indicator 7 (for Policy WP5(c)) | Development on Nationally, Regionally or Locally Designated Nature Conservation Areas |
| References | Plan Objective :6 SA Objective: 12 |
| Target | 0 ha of development on Nationally, Regionally and Locally Designated Nature Conservation Areas |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites with nationally, regionally or locally designated Nature Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence |

| | |
|--|---|
| Indicator 8 (for Policy WP5(c)) | Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas |
| References | Plan Objective :6 SA Objective: 14 |
| Target | 0 ha of development on Nationally, Regionally and Locally Designated Heritage Conservation Areas |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites within Nationally, Regionally or Locally Designated Heritage Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence |

| | |
|--|---|
| Indicator 9 (for Policy WP5(c)) | Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions) |
| References | Plan Objective :6 SA Objective: 7 |
| Target | 0 ha of development permitted against Environment Agency advice |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted contrary to Environment Agency advice. Possibly revise South London Waste Plan in light of evidence |

| | |
|--|--|
| Indicator 10 (for Policy WP6) | Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating |
| Refernces | Plan Objective 5 |
| Target | 100% of permissions |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted have not achieved BREEAM or CEEQUAL "Excellent" rating. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence |

| | |
|--|---|
| Indicator 11 (for Policy WP7) | Development involving Energy from Waste |
| References | Plan Objective :6 SA Objective: 3 |
| Target | 0 permissions |
| Monitoring | Monitor annually against target |
| Delivery Partners | Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry |
| Management Actions | None. There should be no permissions. |

Appendix 2 Sites Counting Towards the Apportionment and C&D Target

| Ref | Name | HC&I | C&D | Potential for Intensification |
|--------------------------|--|---------------|----------------|-------------------------------|
| Croydon Capacity | | | | |
| C1 | Able Waste Services | 0 | 43,268 | |
| C4 | Days Aggregates Purley Depot | 0 | 178,593 | |
| C5A | Factory Lane Waste Transfer Station | 0 | 0 | Yes |
| C5B | Factory Lane Reuse and Recycling Centre Site | 9,623 | 5,206 | |
| C6 | Fishers Farm Reuse and Recycling Centre | 4,542 | 0 | |
| C7 | Henry Woods Waste Management | 0 | 0 | |
| C8 | New Era Metals | 4,213 | 0 | |
| C9 | Peartree Farm | 0 | 0 | |
| C10 | Purley Oaks Reuse and Recycling Centre | 6,684 | 0 | |
| C11 | SafetyKleen | 0 | 0 | Yes |
| C12 | Stubbs Mead Depot | 0 | 0 | Yes |
| C13 | Solo Wood Recycling | 5,000 | 0 | Yes |
| CEX | Exempt Sites | 2,580 | 0 | |
| | Croydon Total | 32,883 | 227,067 | |
| Kingston Capacity | | | | |
| K2 | Genuine Solutions Group | 1,630 | 0 | Yes |
| K3 | Kingston Reuse and Recycling Centre | 9,392 | 0 | |
| K4 | Kingston Waste Transfer Station | 19,620 | 0 | |
| KEX | Exempt Sites | 5,000 | 0 | |
| | Kingston Total | 35,642 | 0 | |
| Merton Capacity | | | | |
| M1 | B&T@Work | 0 | 0 | |
| M2 | European Metal Recycling | 70,100 | 0 | |
| M3 | Deadman Confidential | 9,866 | 0 | Yes |
| M4 | Garth Road Reuse and Recycling Centre | 15,704 | 0 | |
| M5 | Garth Road Transfer Station | 0 | 0 | |
| M6 | George Killoughery | 0 | 0 | |
| M7 | LMD Waste Management (Abbey Industrial Estate) | 0 | 20,774 | |
| M8 | LMD Waste Management (Wandle Way) | 0 | 33,845 | |
| M9 | Maguire Skips | 0 | 0 | |
| M10 | Powerday | 0 | 42,856 | |
| M11 | Morden Transfer Station | 0 | 0 | |

| | | | | |
|-----|--------------------------------------|----------------|----------------|-----|
| M12 | NJB Recycling | 0 | 18,030 | |
| M13 | One Waste Clearance | 13,453 | 4,547 | |
| 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 | 1,000 | 0 | |
| | Merton Total | 213,179 | 150,183 | |

Sutton Capacity

| | | | | |
|-----|---|----------------|---------------|-----|
| S1 | 777 Recycling | 20,625 | 32,972 | |
| S2 | Beddington Farmlands Energy Recovery Facility | 275,000 | 0 | |
| S3 | Cannon Hygiene | 0 | 0 | |
| S4 | Croydon Transfer Station | 21,113 | 0 | Yes |
| S5 | Hinton Skips | 5,381 | 1,819 | Yes |
| S6 | Hydro Cleansing | 0 | 0 | |
| S7 | Kimpton Reuse and Recycling Centre | 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 | Beddington Resource Recovery Facility | 305,000 | 0 | |
| S13 | Exempt Sites | 500 | 0 | |
| | Sutton Total | 664,641 | 43,025 | |

South London Capacity

| | | | |
|---------------------------|----------------|----------------|--|
| Croydon | 32,883 | 227,067 | |
| Kingston | 35,642 | 0 | |
| Merton | 213,179 | 150,183 | |
| Sutton | 664,641 | 43,025 | |
| South London Total | 946,345 | 420,275 | |

South London Capacity against Target

| | | | |
|---|----------------|---------------|--|
| South London Capacity | 946,345 | 420,275 | |
| South London Target | 929,750 | 414,380 | |
| South London Capacity against Target | +16,565 | +5,895 | |

Appendix 3 Sites and Areas from the 2011 South London Waste Plan

| Ref | Name | Borough | New Status |
|--------------------------|--|----------|--|
| Safeguarded Sites | | | |
| 1 | Factory Lane 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 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 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 | Safeguarded 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 | New Status |
|--|--|----------|---|
| Areas With Sites Which May Be Suitable For Waste Facilities | | | |
| 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 |



Appendix 4 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 biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used as fertiliser

Beneficial Use

The placement of excavation waste in a way that:

- (1) provides environmental benefits, particularly in the restoration of priority habitats, flood alleviation or climate change adaptation/mitigation; or
- (2) contributes towards the restoration of landfill sites or mineral workings

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, and products and materials are recovered and regenerated at the end of each service life.

Commercial Waste

Waste arising from trade premises

Construction and Demolition 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

Excavation Waste

Soil, stone, rock and similar materials arising from site preparation activities

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 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 characteristics, quantity or concentration 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 take to household waste reuse and recycling centres

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 principal 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 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 licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet relevant criteria

Non-Inert

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

Recovery

Reuse, 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

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

Reuse

The cleaning or repairing of waste for use in its original form

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 by waste planning authorities, setting out policies in relation to waste management and related developments

Waste Management

Processes by which waste is reused, recycled or recovered. It does not include waste transfer (where waste is sorted and baled) or landfill

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 management. 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

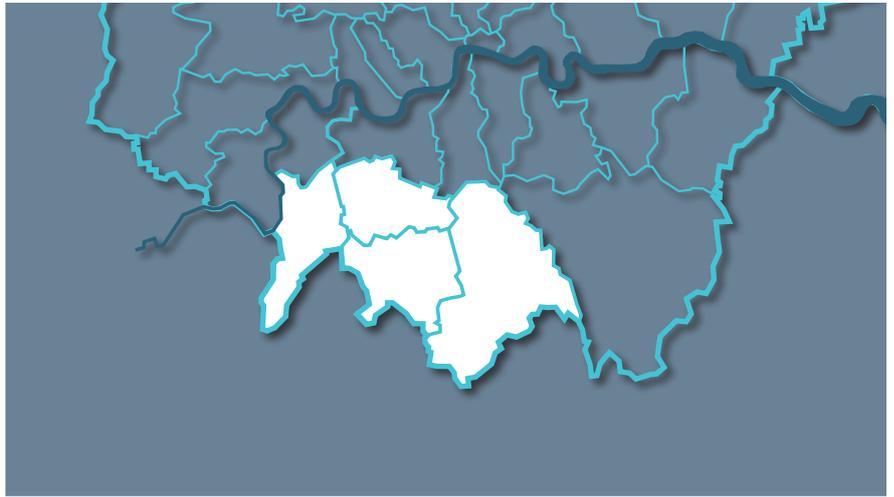
Processes by which waste is sorted or baled prior to transfer to another place for reuse, recycling, recovery or disposal. Although in practice, usually some reuse, recycling and recovery occurs in the sorting and baling.

Waste Treatment

All processes for waste management (see above) and waste transfer (see



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



South London Waste Plan



Sustainability Appraisal (SA)
incorporating Strategic Environmental Assessment (SEA)
on Draft for Submission to Government

September 2020

Executive Summary

This SA Report on the draft South London Waste Plan (SLWP) Submission Version provides a comprehensive review of current and future waste arisings within the plan area; existing waste management sites, throughput and capacity; national, sub-regional and local policies; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the proposed policies and safeguarded waste sites on each of the sustainability objectives making up the SA Framework. The SA Report is accompanied by an Equalities Impact Assessment (EqIA) report and Habitats Regulations Assessment (HRA) screening.

The report meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in national planning practice guidance and the SEA regulations respectively, and has been published to inform public consultation on the draft SLWP Submission Version from xxx MONTH to XXX MONTH (Regulation 19 consultation). It builds upon the SA Scoping Report and the SA Report on the SLWP Issues and Preferred Options document published for public consultation in October 2019 and takes account of representations received.

The SA Matrix in Section 12 demonstrates that draft Policies WP1-WP10, which have been developed by the four partner boroughs as the proposed strategy for the new SLWP for 2021-36 (Option 1), will have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

Overall, the most important sustainability benefits of the preferred strategy include:

- promoting **net self-sufficiency** within South London;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings;
- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in the plan area;
- minimising **air pollution** and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network;
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery**;
- helping to secure the transition to a **circular economy** within south London; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste uses.

Further stakeholder feedback arising from consultation will inform the preparation of the final plan to be submitted to the government.

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1. Introduction

Purpose of the new South London Waste Plan

1.1 The London boroughs of Croydon, Kingston, Merton and Sutton are preparing a new South London Waste Plan (SLWP) covering the time period 2021-36. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21¹ introduced in 2012.

1.2 The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

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

1.3 A new plan is needed from 2021 onwards because, in the absence of waste policies, all four local planning authorities would otherwise be unable to refuse inappropriate applications for waste treatment. Neither the adopted Local Plans for Sutton or Croydon include waste policies nor do the emerging Local Plans for Kingston and Merton. With a number of waste operators transferring between sites in Sutton, Croydon and Merton over the past ten years, the four partner boroughs consider that collaborative working at the sub-regional level is essential for effective waste planning.

1.4 Figure 1.1. shows the geographical coverage of the four partner boroughs.

Figure 1.1: The South London Waste Plan area



¹ the current South London Waste Plan 2012 is available at <https://drive.google.com/file/d/0Bww0pBhg-RKJc3ExSE9vQ1czbU0/view>

1.5 Following public consultation on an Issues and Preferred Options document and accompanying sustainability appraisal (SA) between 31 October and 22 December 2019 (Regulation 18 consultation²), a draft version of the SLWP 2021-36 (the draft plan) has been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public. The draft plan, which incorporates a number of changes made in the light of representations received and changing circumstances, has now been published for further consultation in accordance with Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012. The draft plan safeguards 46 existing sites for waste treatment and identifies ten development management policies to guide waste treatment within the four boroughs over the next 15 years.

1.6 This sustainability appraisal (SA) report, incorporating strategic environmental assessment (SEA), Equalities Impact Assessment (EqIA) and Habitats Regulations Screening, has been published for public consultation alongside the draft plan.

National planning policy requirements

1.7 The National Planning Policy for Waste³ (NPPW) (DCLG, 2015) requires local planning authorities to prepare local plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams by:

- undertaking early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial;
- driving waste management up the Government's waste hierarchy (see Figure 1.2), recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal;
- in particular, identifying the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (in London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans);
- considering the need for additional waste management capacity of more than local significance and reflecting any requirement for waste management facilities identified nationally;
- taking into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required;
- working collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management; and
- considering the extent to which the capacity of existing operational facilities would satisfy any identified need.

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

³ the NPPW is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

Figure 1.2: The Waste Hierarchy

Figure 1
The Waste Hierarchy

London Plan Apportionment targets

1.8 The Intend to Publish London Plan (GLA, December 2019)⁴ includes the following targets for waste which reflect those set out in the Mayor's Environment Strategy (GLA, 2018):

- the equivalent of 100% of London's waste managed within London (i.e. net self-sufficiency) by 2026 for all waste streams except excavation waste;
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

1.9 New apportionment targets are set for each borough in order to meet the net self-sufficiency target for local authority collected waste (LACW) and for commercial and industrial (C&I) waste.

Table 1.1 sets out the combined apportionment targets for South London for 2021 and at the end of the plan period in 2041.

Table 1.1: Apportionment targets for South London in the Intend to Publish London Plan 2019

| Borough | Apportionment (tonnes per annum) | |
|--------------|----------------------------------|----------------|
| | 2021 | 2041 |
| Croydon | 252,000 | 268,000 |
| Kingston | 187,000 | 199,000 |
| Merton | 238,000 | 253,000 |
| Sutton | 210,000 | 224,000 |
| Total | 887,000 | 944,000 |

Requirement for Sustainability Appraisal

1.10 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal (SA) in the preparation of all development plan documents (DPDs) forming part of the local development plan, including local waste plans. SAs should incorporate the requirements of the UK Strategic Environmental Assessment (SEA) Regulations 2004, which implement the requirements of the EU SEA Directive 2001/42/EC. The purpose of SA is to ensure a high level of protection of the environment as part of the preparation of certain plans and programmes.

⁴ the Intend to Publish London Plan 2019 is available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>

What is sustainable development?

1.11 The UK Sustainable Development Strategy (ODPM⁵, 2005) defines sustainable development as *"enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations"*. The Strategy is based on the following guiding principles:

(1) Living within Environmental Limits

Respecting the limits of the planet's environment, resources and bio-diversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.

(2) Ensuring a Strong, Healthy and Just Society

Meeting the diverse needs of all people in existing and future communities, promoting personal well being, social cohesion and inclusion and creating equal opportunity for all.

(3) Achieving a Sustainable Economy

Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them, and efficient resource use is incentivised.

(4) Using Sound Science Responsibly

Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

(5) Promoting Good Governance

Actively promoting effective, participative systems of governance in all levels of society, engaging people's creativity, energy and diversity.

1.12 In seeking to regulate the development and use of land in the public interest, planning is key to achieving sustainable development by promoting environmental, economic and social objectives together over time. The revised National Planning Policy Framework (NPPF) (MHCLG, February 2019) defines the purpose of planning as follows:

- **economic** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **social** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;
- **environmental** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

⁵ the former Office for the Deputy Prime Minister

Purpose of sustainability appraisal

1.13 SA is integral to the preparation and development of all DPDs, including local waste plans. Its purpose is to promote the aims of sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The relationship between the SA and plan preparation processes is shown in Figure 1.3.

1.14 SA reports on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development. By identifying key issues, developing policies and proposals and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable plans which are evidence-based. In the context of waste planning, the appraisal process can help planners and the public gain a better understanding of how well-designed waste facilities in the right locations can deliver long-term benefits for local environmental quality, promoting the circular economy and community well-being.

1.15 To be effective, SA must be

- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- **Objectives-led:** the direction of desired change has measurable targets;
- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

1.16 The SA process also provides the means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

1.17 At the conclusion of the plan-making process, the final SA Report should describe how the adopted plan has addressed the sustainability agenda and the choices that have been made between alternative policies and proposals. This will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.

Consultation on SA Scoping Report

1.18 In order to meet the requirements of the SEA Directive and procedures for community engagement on local plan and SA documents set out in the statutory regulations and respective Statements of Community Involvement (SCI), an initial SA Scoping Report for the new SLWP was published over a five week period from **16 September until 21 October 2019** in order to seek the views of relevant bodies, namely the Environment Agency (EA), Natural England and Historic England, on the proposed scope of the appraisal.

1.19 Its purpose was to define the scope of the appraisal and provide the basis for appraising the potential effects of alternative waste management policies against a comprehensive range of environmental, social and economic criteria. The sustainability objectives, indicators and targets making up the proposed SA Framework were shaped by the aims of national planning policy, the Mayor's Environmental Strategy, the draft London Plan and local planning policies within each of the four boroughs.

1.20 Responses to consultation on the SA Scoping Report were received from the Environment Agency (28 October 2019); Historic England (21 October 2019); and Natural England (17 October 2019). and the comments received have been incorporated within this SA Report. All representations received on the SA Scoping Report (and on the subsequent SA Report on SLWP Issues and Preferred Options) and how they have been addressed are set out in Appendix 3.

Consultation on SA Report on SLWP Issues and Preferred Options

1.21 Following extensive evidence gathering work, culminating in the production of a Technical Paper⁶ by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report (see above), an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019. Importantly, the Issues and Preferred Options document identified that the four boroughs could meet the combined target for household and C&I waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall in meeting the C&D waste target by allowing the intensification of waste treatment for this waste stream on existing sites. The principal headline from the document was to propose no new waste sites, although a replacement site for an existing site would be considered.

1.22 The Issues and Preferred Options document was accompanied by a further SA Report (incorporating SEA, EqIA and Habitats Regulations screening)⁷. Its purpose was to assess the likely effects of the 'preferred option' (consisting of the Vision, eight draft policies and 46 existing waste sites proposed to be safeguarded) and strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework.

1.23 The SA Report concluded that draft Policies WP1-WP8, which were developed by the four partner boroughs as the 'preferred' strategy for the new SLWP (Option 1), would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 were shown to be overwhelmingly negative.

1.24 All representations received on the SA Report on Issues and Preferred Options and how they have been addressed in this SA Report are, again, set out in Appendix 3.

Coverage of SA Report on draft SLWP (Submission Version)

1.25 This document is the SA Report on the draft SLWP 2021-36 (Submission Version). Its purpose is to assess the likely effects of the amended Vision, planning policies and identified sites and the main strategic alternatives against each of the environmental, social and economic objectives making up the SA Framework. As before, the SA Report incorporates the requirements SEA, EqIA and Habitats Regulations screening.

1.26 The following chapters address each of the key stages of appraisal set out in government guidance and best practice within the context of current and future waste arisings, the Vision and

⁶ the South London Waste Technical Paper and accompanying Appendices are available at www.sutton.gov.uk/currentconsultations

⁷ the SA Report on SLWP Issues and preferred Options is available at www.sutton.gov.uk/currentconsultations

objectives for the new plan and prevailing social, economic and environmental trends within south London:

- **Section 2** describes the background to the preparation of the new **South London Waste Plan (SLWP)** and the next steps as the plan approaches the EiP stage;
- **Section 3** reviews **Current Waste Arisings and Capacity in South London** drawing upon the Technical Paper (Anthesis, June 2019) and updated evidence on waste management throughputs based on the EA's waste data interrogator as reported in Sutton's Authority Monitoring Report 2018-19 (LB Sutton, March 2020)⁸;
- **Section 4** outlines the main stages of **Sustainability Appraisal and Strategic Environmental Assessment** drawing upon government guidance and best practice;
- **Section 5** reviews other **Relevant Plans, Programmes and Sustainability Objectives** at the national, regional and local levels (**Task A1**)⁹;
- **Section 6** provides updated **Baseline** information for South London in terms of the key social economic and environmental trends likely to be influenced by the plan (**Task A2**);
- **Section 7** identifies the key **Sustainability Issues** to be addressed by the SLWP and the sustainability appraisal process, taking account of representations received at each stage (**Task A3**);
- **Section 8** sets out the finalised **Sustainability Appraisal Framework** consisting of the key sustainability objectives, indicators and targets against which the likely effects of the draft Plan and alternative options have been appraised (**Task A4**); and
- **Section 9** describes the process by which **Potential Waste Sites** have been identified and assessed as part of the evidence gathering stage. This chapter should be read in conjunction with the more detailed assessment set out in the Technical Paper, the accompanying Appendices and the updated waste throughput data set out in the Sutton AMR 2018-19 (**Task A5**); and
- **Section 10** describes the development of **Proposed SLWP Policies** and defines the strategic alternatives for the purpose of appraisal (**Task A5**); and
- **Section 11** analyses the **Compatibility of the Proposed Vision and Objectives against each of the Sustainability Appraisal Framework Objectives (Tasks B1)**
- **Section 12** sets out the **Results of Appraisal** for each of the draft policies (Policies WP1-WP8) and waste management sites set out in the draft Plan (**Tasks B3, B4 and B5**)
- **Section 13** sets out the **Conclusions (Task A5)**.

Equalities Impact Assessment (EqIA)

1.27 The purpose of Equalities Impact Assessment (EqIA) is to help public bodies identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 removed the formal requirement for public bodies in

⁸ Sutton's AMR 2018-19 is available at https://www.sutton.gov.uk/info/200464/planning_policy/1419/authority_monitoring_report_amr

⁹ in line with best practice, a comprehensive scoping table will be provided as part of the next SA/SEA Report on SLWP Issues and Preferred Options which will be published for public consultation from 31 October to 22 December 2019

England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to 'give due regard' to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty.

1.28 Since many of the issues to be addressed as part of the wider plan appraisal process will inevitably overlap with the consideration of potential impacts upon equalities groups, the requirements of EqIA will be integrated as part of the SA process.

1.29 Accordingly, an updated EqIA Screening report on the draft SLWP (Submission Version) is included in this document as Appendix 1.

Habitats Regulations Assessment (Appropriate Assessment)

1.30 The need for habitats regulations assessment¹⁰ (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive') as set out in the Conservation of Habitats and Species Regulations 2010 (as amended). The Regulations seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

1.31 Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European site, either individually or in combination with other projects.

1.32 The following four European sites are located within or in relatively close proximity to the plan area and are therefore potentially affected by the new SLWP 2021-36:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).

1.33 However, only Wimbledon Common SAC lies within the boundaries of the SLWP area.

1.34 Following initial habitats regulations screening undertaken as part of the SA scoping stage, the four partner boroughs concluded that it was very unlikely that a full HRA will need to be prepared for the new waste plan for the reasons detailed in the SA Scoping Report and in Appendix 2 of the SA Report on SLWP Issues and Preferred Options.

1.35 This view is supported by Natural England, the relevant statutory body with responsibility for promoting nature conservation. A letter sent by Natural England on 17 October 2019 in response to public consultation on the SA Scoping Report stated that it had "no comments" on the plan. In a subsequent email dated 31 January 2020 (see Appendix 2), Natural England confirmed that "no comments" should be interpreted by the four partner boroughs to mean that it does not consider that a full HRA is required for the SLWP.

¹⁰ HRA is also referred to as 'Appropriate Assessment'

Sequential test (flood risk)

1.36 The updated national planning policy framework (NPPF) requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Development plan documents should therefore apply a sequential, risk-based approach to designating sites in order to avoid flood risk to people and property and manage any residual risk, taking account of climate change, by applying the 'sequential test' and if necessary, applying the 'exception test' to all potential development sites in line with technical guidelines¹¹ set out in the NPPG.

1.37 If, following the sequential test, it is not possible, consistent with wider sustainability objectives, for a proposed development to be located in lower flood risk zones, the following two elements of the 'exception test' must be demonstrated where appropriate:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
- a site-specific flood risk assessment (FRA) must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall..

1.38 According to the Government's flood risk vulnerability classifications¹², waste treatment facilities fall within the 'less vulnerable' category, with the exception of landfills and hazardous waste facilities, which are classified as 'more vulnerable'. Therefore, based on the government's flood risk vulnerability and flood zone compatibility table, the vast majority of waste sites (which do not involve hazardous waste or landfilling operations) are compatible with all EA flood zones up to and including Flood Zone 3a (high risk). However a newly proposed site allocation or planning application for a hazardous waste facility located within Flood Zone 3a (high risk). Environment Agency (EA) must pass the exceptions test and should not be permitted at all within Flood Zone 3b.

1.39 As can be seen from the response to consultation on the SA Scoping Report, the EA has undertaken a comprehensive review of the proposed waste sites identified in the Issues and Preferred options document against a range of environmental criteria including flood risk, proximity to main rivers, source protection areas and current environmental permit compliance rating.

1.40 Since no new waste sites are being put forward part of the new SLWP and in view of the fact that all of the existing safeguarded sites within the plan area have previously been subject to the sequential and exceptions test as part of the preparation of the current SLWP 2011-21, and/or been subject to a site-specific flood risk assessment where necessary, it is considered that it is unnecessary to include a sequential test report as part of this document.

Consultation arrangements

1.41 This SA report is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from **xxxx MONTH to XXXX MONTH 2020**.

¹¹ formerly set out in the Government's Planning Policy Statement on Development and Flood Risk (PPS25) (now cancelled)

¹² see Table 3 at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility.pdf

1.42 Copies of the document and evidence are available at the following locations:

- www.croydon.gov.uk/planningandregeneration/framework/localplan/slwaste-plan;
- [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/local-plan; and
- www.sutton.gov.uk/currentconsultations.

Preparing the new South London Waste Plan 2021-36

Consultation on SLWP Issues and Preferred Options document (Regulation 18 Consultation)

2.13 Following extensive evidence gathering work, culminating in the production of the Technical Paper by Anthesis consultants on behalf of the four boroughs in June 2019, and publication of the SA Scoping Report, an SLWP Issues and Preferred Options document was published for public consultation between 31 October and 22 December 2019.

2.14 The following key waste planning issues were identified:

- Key Issue 1 Cross Boundary Issues;
- Key Issue 2 How much waste must the South London Waste Plan plan for?
- Key Issue 3: Scarcity of Land;
- Key Issue 4: Waste Transfer Facilities; and
- Key Issue 5: Climate Change, the End of Landfill, and the The Circular Economy.

2.15 The document put forward eight draft waste policies and identified 46 existing sites across the four boroughs to be safeguarded for waste treatment uses over the plan period to 2036. Importantly, the document identified that the four boroughs could meet their target for household and commercial and industrial waste (C&I) by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites, and proposed to meet the shortfall against the C&I target by allowing the intensification of treatment on existing sites. The document proposed no new waste sites, although a replacement site for an existing site would be considered.

2.16 Consultation methods were developed in accordance with the statutory regulations and respective Statements of Community Involvement (SCIs) and included contacting all individuals and organisations on the respective planning policy consultation databases; dedicated consultation webpages; making the documents available at Council offices and libraries; notices in the local press; council tweets and Facebook posts; presentations to local neighbourhood committees; and letters delivered to residential properties in the vicinity of proposed waste sites.

2.17 At the close of consultation period, a total of 1,155 representations¹⁷ had been received from 78 individual consultees. The key waste planning and sustainability issues arising from public consultation and how they have been addressed in the draft Plan are discussed further in Section 7.

Publication Draft SLWP (Submission Version) (Regulation 19 Consultation)

2.18 A draft version of the SLWP 2021-36 (the draft Plan) has now been published for public consultation between XXX MONTH and YYYY MONTH prior to submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) for Examination-in-Public (EIP).

2.19 The major changes made to the draft waste policies and sites proposed to be safeguarded in the Issues and Preferred Options document are as follows:

- **Key Issue 3 - Scarcity of Land** has been updated to reflect the fact that the London Plan housing targets have been reduced and to provide more statistics on the demand for industrial land from non-waste industrial uses;
- **The Vision and Objectives** have been amended because they did not quite reflect the policies;
- **Policy WP2 (Strategic Approach to Other Forms of Waste)** has been amended to reflect the move from a shortfall in C&D waste to a small surplus against the target. Also, the position regarding Excavation Waste has been clarified to reflect the concerns of South East councils;

¹⁷ a complete list of representations to the SLWP Issues and Preferred document and to accompanying SA Report together with officer comments are available at xxxxxx

- **Policy WP6 (Sustainable Construction of Waste Facilities)** has been amended so that the sustainability credentials can be measured against one and/or two sustainability metrics;
- **Policy WP8 (New Development Affecting Existing Sites)** is a new policy to reflect the requests from SUEZ and Veolia. It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy;
- **Policy WP10 (Monitoring and Contingencies)** is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies;
- **Site C2 (Croydon Car Spares, Croydon)** has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- **Site C3 (Curley Skip Hire, Croydon)** has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- **Site C5 (Factory Lane Waste Transfer Station, Croydon)** has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners;
- **Site K1 (Chessington Equestrian Centre, Kingston)** has been deleted because it is a temporary site which is closing soon;
- other changes to safeguarded sites comprise boundary changes, references to overhead power lines and references to the need of a transport assessment including cumulative impacts;
- a table of indicators has been introduced as part of the draft Plan (as Appendix 1) for the purpose of monitoring the effectiveness of SLWP policies over the plan period; and
- new waste throughput figures have been included in Appendix 2 of the draft Plan in order to reflect the latest information from site owners and amendments as to which sites have potential for intensification.

2.20 Any objections to the draft plan must be made with reference to the 'Tests of Soundness' in Paragraph 35 of the National Planning Policy Framework: **positively prepared; justified; effective; and consistent with national policy.**

Next Steps

2.21 Following the publication of the draft Plan, there are a number of procedural steps that need to be followed before the SLWP 2021-36 can be adopted and these are set out in Table 2.1 below.

Table 2.1: Timetable for adopting the new SLWP 2021-36

| Steps | Timescale |
|---|-----------|
| Draft SLWP Published and Representations Sought | xxx |
| End of Representations Period | xxx |
| Consideration of Representations | xxx |
| Submission to the Secretary of State | xxx |
| Appointment of Planning Inspector | xxx |
| Start of Hearings for the Examination-in-Public (EiP) | xxx |
| End of Hearings for the EiP | xxx |
| Main Modifications (arising from the EiP) <i>NB: This stage may not be required</i> | xxx |
| Issuing of the Inspector's Report | xxx |
| Recommendation for Adoption by the HEB Committee | xxx |
| Adoption at Full Council | xxx |

2. Background to the South London Waste Plan

Current arrangements for waste collection and disposal

2.1 Of the 33 London Boroughs, 21 are arranged into the four statutory joint waste disposal authorities (WDAs) covering East London, North London, West London and West London Riverside (2-tier system). However, each of these Boroughs is responsible for the collection of its own waste.

2.2 The remaining 12 Boroughs, including the South London Boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames, are Combined Waste Collection and Disposal Authorities (i.e. unitary authorities), with separate responsibilities as Waste Collection and Disposal Authorities and as Waste Planning Authorities.

2.3 Each borough's function as a waste planning authority is outlined in National Planning Policy for Waste¹³ (NPPW) (DCLG, 2015) which requires that waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. This is the principal purpose of the South London Waste Plan (SLWP).

South London Waste Partnership

2.4 There are many advantages to joint working on a sub-regional level. Waste arisings rarely remain within individual borough boundaries and joint working can also achieve financial savings for individual boroughs. Accordingly, the four South London boroughs of Croydon, Merton, Sutton and Kingston-upon-Thames formed the South London Waste Partnership in order to jointly procure waste treatment and disposal contracts for municipal waste. As the disposal authority for household waste collected by the four South London Boroughs, the South London Waste Partnership adopted a joint Municipal Waste Management Strategy¹⁴ (JMWMS) for South London in 2011 covering the period 2010-20 with the aims of:

- minimising the climate change impact of managing municipal solid waste (MSW) through effective and efficient diversion from landfill;
- working at a sub-regional level to deliver cost effective and environmentally sound waste management services; and
- working towards conformity with the Waste Strategy for England 2007¹⁵ and the London Municipal Waste Management Strategy.

2.5 The most effective way of achieving these aims is to promote more sustainable waste management practices further up the waste management hierarchy (Figure 1.1).

2.6 In 2008, the four partner boroughs decided to prepare a joint waste plan for South London in order to establish a framework of planning policies and site allocations to meet future waste capacity needs in South London for the period 2010-20.

¹³ the NPPW is available at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

¹⁴ the JMWMS 2010-20 is available at <http://www.slpw.org.uk/wp-content/uploads/2011/03/Waste-Strategy-FINAL.pdf>

¹⁵ the Waste Strategy for England 2007 is available at <https://www.gov.uk/government/publications/waste-strategy-for-england-2007>

The current South London Waste Plan 2012

2.7 The current South London Waste Plan (SLWP), adopted in March 2012, sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within South London over the 10-year period from 2011-21. The SLWP, which forms part of the local development plan for each of the partner boroughs, safeguards 27 existing permitted waste facilities and identifies 11 broad locations (industrial areas) suitable for new waste facilities in order to meet the then London Plan apportionment for 2011 (Table 2.1) and sets out a number of criteria-based policies for determining planning applications for waste management facilities.

Table 2.1: London Plan 2011 Combined Apportionments for the South London Waste Plan area

| Year | Combined municipal (MSW) and Commercial & Industrial (C&I) waste apportionment |
|--------------------|--|
| 2010 | 854,000 tonnes |
| 2015 | 1,130,000 tonnes |
| 2020 | 1,332,000 tonnes |
| 2021 ¹⁶ | 1,326,000 tonnes |

2.8 In seeking to meet and exceed the combined apportionment targets for municipal solid waste (MSW) and commercial and industrial waste (C&I), Policy WP1 of the SLWP aims to provide sufficient capacity within the four boroughs to manage:

- a minimum of 834,011 tonnes of waste by 2016 to meet the 2011 London Plan apportionment and strive to achieve self-sufficiency by providing 1,004,350 tonnes of capacity in total to meet South London's waste management needs; and
- a minimum of 941,024 tonnes of waste by 2021 to meet the 2011 London Plan apportionment and strive to achieve self-sufficiency by providing 1,017,427 tonnes of capacity.

2.9 The above targets are to be achieved by safeguarding existing waste management capacity and encouraging intensification of existing waste sites identified in Policy WP3 and by developing additional capacity within the industrial areas identified in Policy WP4 where this complies with all other waste plan policy requirements and the waste hierarchy.

2.10 Under Policy WP2, planning permission for additional facilities for other waste streams, including construction, demolition and excavation waste (CD&E), hazardous waste, agricultural waste, clinical waste, radioactive waste and waste water will be permitted where there is an identified need for such a facility within the South London Waste Plan area, which cannot be met through existing waste facilities or the adaptation of existing waste facilities.

2.11 Since the adoption of the SLWP in 2012, the four partner boroughs have monitored performance against the above targets through the publication of an Annual Monitoring Report (AMR). Section 3 of this document provides a detailed review of current and future waste arisings within the plan area, and existing and potential waste management sites across the four borough drawing upon updated evidence set out in the Technical Paper.

2.12 The SLWP plan period is now coming to an end and a new waste plan is required in order to meet the Mayor's updated apportionment targets from 2021 to 2041 in the 'Intend to Pubis'h London Plan (GLA, December 2019) and a range of other sustainable waste management targets set out in the Mayor's Environment Strategy (GLA, 2018).

¹⁶ the London Plan 2011 provided an apportionment to 2020. The 2021 apportionment was based on London's continuing 85% self-sufficiency and maintaining the Plan area's contribution to this

3. Current Waste Arisings and Capacity in South London

Evidence gathering

3.1 Any new waste plan must be underpinned by a robust and proportionate evidence base document which includes an assessment of existing capacity, waste management need and suitable sites and areas to meet this need. Accordingly, the four partner boroughs commissioned Anthesis Consultants to prepare a comprehensive evidence base upon which the new South London Waste Plan 2021-36 can be prepared. The outcome of this comprehensive study is set out in the 'South London Waste Technical Paper (Anthesis, June 2019).

3.2 The Technical Paper includes the following outputs:

Policy context

- a review of all legislation and policy relevant to waste planning in England and to the preparation of a waste development plan document (DPD) and its evidence base.

Waste arisings and forecasts for apportioned waste

- waste arisings and forecasts to 2036 for each waste type covered by the draft London Plan apportionment i.e. household and commercial & industrial (C&I) wastes.

Arisings and forecasts for other waste types

- waste arisings and forecasts for other waste streams that do not count towards the draft London Plan apportionment e.g. construction, demolition and excavation waste (CD&E), low level radioactive waste, agricultural waste, hazardous waste and wastewater.

Waste capacity assessment for apportioned waste

- an assessment of current and future waste management capacity of waste sites/facilities in each of the partner boroughs as well as in the SLWP area as a whole, including apportionment criteria¹⁸; existing capacity for permitted and exempt waste sites; the 'capacity gap' between apportionment targets and arisings of other waste types compared to the management capacity; and the likely land requirement to meet any shortfall (for each borough and collectively).

Sites and areas

- potential sites and areas which could help meet the capacity gap, either through the intensification of existing operations, or through delivery of new sites.

Imports and exports

- an assessment of waste imports and exports to and from the SLWP area.

Conclusions and recommendations

- key conclusions and recommendations arising from the study.

¹⁸ apportionment criteria are needed to determine what types of waste facility/operations should be counted as 'waste management' and therefore what waste streams should count towards the apportionment

Waste arisings and forecasts for apportioned waste

3.3 Table 3.1 shows forecast household and C&I waste arisings in the four boroughs over the plan period and the combined apportionment targets for managing this waste set out under Policy SI8 of the 'Intend to Publish' London Plan (GLA, December 2019)¹⁹. Unlike the existing London Plan, the new apportionment targets are not broken down into separate household and C&I waste streams.

Table 3.1: Forecast household and C&I waste arisings and draft London Plan apportionments for 2021 to 2036 (tonnes per annum)²⁰

| | 2021 | | 2026 | | 2031 | | 2036 | |
|-------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| | Arisings | Apportionment | Arisings | Apportionment | Arisings | Apportionment | Arisings | Apportionment |
| Croydon | 305,000 | 252,000 | 309,000 | 256,000 | 312,000 | 260,000 | 320,000 | 264,000 |
| Kingston | 152,000 | 187,000 | 153,000 | 190,000 | 155,000 | 193,000 | 157,000 | 196,000 |
| Merton | 174,000 | 238,000 | 175,000 | 241,750 | 175,000 | 245,500 | 180,000 | 249,250 |
| Sutton | 161,000 | 211,000 | 161,000 | 213,500 | 161,000 | 217,000 | 168,000 | 220,550 |
| SLWP | 792,000 | 887,000 | 800,000 | 901,250 | 808,000 | 915,500 | 825,000 | 929,750 |

3.4 The Mayor calculates future household waste arisings for each Borough on the basis of the average tonnage of waste generated per person multiplied by the forecast number of residents identified in the GLA's latest population projections. A 5% reduction is then factored in to account for the anticipated increase in waste management efficiency and the growth in the circular economy by the end of the London Plan period (2041).

3.5 However, forecast household and C&I waste arisings are then redistributed amongst Boroughs for the purpose of setting revised London Plan apportionment targets. Boroughs considered to have more scope to manage higher levels of waste have been given a higher apportionment target and those considered to have less scope have a lower target. The Mayor used the following criteria for redistributing apportionment 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.

3.6 It can be seen from the above table that three out of the four boroughs have been set apportionment targets which are higher than their anticipated waste arisings from 2021 to 2036, with the exception of Croydon, which has been set a lower target. Overall, the combined apportionment for the four boroughs is higher than the anticipated arisings over the plan period.

3.7 In order to assess whether there is sufficient waste management infrastructure within the SLWP area, the new combined apportionment targets have been used, rather than forecast arisings.

¹⁹ see Policy SI8 'Waste capacity and net waste self-sufficiency' at https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf

²⁰ the new London Plan apportionment targets for each borough in 2021 and 2041 have been used to calculate targets for the intervening years up to the end of the SLWP period in 2036

Arisings and forecasts of other waste types

Construction and Demolition Waste Arisings

3.8 Table 3.2 shows both the current and forecasted construction and demolition (C&D) waste arisings within the plan area. Figures for 2017 are taken from the Environment Agency's (EA) Waste Data Interrogator, and future arisings have been forecast using the GLA's employment forecasts for the construction sector until 2036. These figures show an increase in forecast C&D waste arisings from 382kt in 2017 to 414kt by 2036.

Table 3.2: Forecast C&D waste arisings for the SLWP area (tonnes per annum)

| Area | Waste Source | Waste Type | 2017 | 2021 | 2026 | 2031 | 2036 |
|----------|--------------|--------------|----------------|----------------|----------------|----------------|----------------|
| Croydon | C&D | Inert/C+D | 282,613 | 292,593 | 294,629 | 300,542 | 304,303 |
| | | Hazardous | 364 | 377 | 380 | 388 | 392 |
| | | Total | 282,977 | 292,970 | 295,009 | 300,930 | 304,695 |
| Kingston | C&D | Inert/C+D | 37,530 | 37,850 | 38,242 | 39,002 | 39,002 |
| | | Hazardous | 36 | 37 | 37 | 38 | 38 |
| | | Total | 37,566 | 37,887 | 38,279 | 39,040 | 39,040 |
| Merton | C&D | Inert/C+D | 46,243 | 47,956 | 50,051 | 52,081 | 54,016 |
| | | Hazardous | 19 | 19 | 20 | 21 | 22 |
| | | Total | 46,262 | 47,975 | 50,071 | 52,102 | 54,038 |
| Sutton | C&D | Inert/C+D | 15,478 | 15,638 | 15,834 | 16,214 | 16,576 |
| | | Hazardous | 29 | 29 | 30 | 30 | 31 |
| | | Total | 15,507 | 15,667 | 15,864 | 16,244 | 16,607 |
| SLWP | C& | Inert/C+D | 381,865 | 394,036 | 398,756 | 407,838 | 413,897 |
| | | Hazardous | 448 | 463 | 467 | 477 | 483 |
| | | Total | 382,313 | 394,499 | 399,223 | 408,315 | 414,380 |

Low Level Radioactive Waste

3.9 According to the EA's public register, there are ten organisation holding 13 permits to keep and use radioactive materials within the four SLWP boroughs. These are mainly hospitals, universities and private companies. Any discharges from these permitted facilities to air, water (including discharges to sewer) and land are regulated and monitored under the Pollution Prevention and Control (PPC) regime. The latest EA dataset (2017) identifies small permitted discharges to sewer within the plan area but no solid waste transfer, and therefore this waste places no requirement on the SLWP to deliver additional solid waste management infrastructure.

Agricultural Waste

3.10 Data from the WDI shows that only 383 tonnes of waste from agricultural sources were generated within the SLWP area in 2017. Given the relatively small tonnage of this waste and the predominantly urban character of the four boroughs, this waste stream is not considered to require further consideration.

Hazardous Waste

3.11 Table 3.3 shows that hazardous waste arisings within the plan area are predicted to increase from 20.2 ktpa in 2017 to around 21.6 ktpa by 2036 based on the EA's Hazardous Waste Data Interrogator (WD).

3.12 Future hazardous waste arisings have been forecast using anticipated growth rates in the GLA's draft London Plan and forecast C&I waste arisings. However, these tonnages are already included in the household and C&I waste apportionment and in forecasted CD&E waste arisings.

Table 3.3: Hazardous waste arisings in the SLWP area (tonnes per annum)

| | 2017 (baseline) | 2021 | 2026 | 2031 | 2036 |
|-------------|--------------------|---------------|---------------|---------------|---------------|
| Croydon | 8,514 | 9,008 | 9,008 | 9,008 | 9,193 |
| Kingston | 2,404 | 2,404 | 2,404 | 2,404 | 2,432 |
| Merton | 4,325 | 4,591 | 4,591 | 4,591 | 4,685 |
| Sutton | 4,936 | 5,239 | 5,239 | 5,239 | 5,303 |
| SLWP | 20,180 | 21,242 | 21,242 | 21,242 | 21,612 |

Wastewater

3.13 Thames Water is responsible for wastewater and sewage sludge treatment in London and for the management of sewage treatment works (STWs) and associated sewerage infrastructure. Wastewater quantities are expected to increase from 52.9 million m³/yr to 55.7 million m³/yr over the plan period. The four boroughs are served by STWs at Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC). Thames Water has confirmed that these facilities have adequate capacity to manage the incoming sewage and have all had major capacity increases since 2010²¹.

Waste exports and imports

3.14 In total for the combined household and C&I (apportioned) waste streams, in the baseline year of 2017, the SLWP area exported 309,700 tonnes but 'received' around 620,000 tonnes of apportioned waste which was not identified as being generated within the four boroughs. This would suggest that the SLWP area is a net importer of waste. However, a very large proportion of the imports were non-codeable (ie. origin data not provided), and therefore some of this waste is likely to have been generated within the four boroughs themselves. There is no way of attributing this tonnage to specific WPAs. In addition, 235,000 tonnes of waste received (38% of the total) was received by transfer stations, rather than final destination waste treatment facilities.

3.15 Similarly, 238,000 tonnes of CD&E waste was exported from the SLWP area to other WPAs. However, again although the figure for imports is higher at 393,000 tonnes, only 91,000 tonnes were attributable to specific WPAs, and the remaining origins are unknown. And 71% of the waste imported (278,300 tonnes) was received by transfer stations, rather than final destination waste treatment facilities.

3.16 For hazardous waste, as the data source is different, there is less uncertainty with regard to origins. In this case, SLWP area exported 20,200 tonnes in 2017, with 20% of this going to Kent. South London received 800 tonnes in 2017, and so is a net exporter of hazardous waste.

²¹ details of STW capacity increases in recent years are set out in the Thames Water Asset Management Plans for 2010-15 (AMP5) and for 2015-20 (AMP6)

Existing waste management sites and capacity

3.17 As part of the evidence base for the new plan, a comprehensive analysis has been undertaken for all operational waste management sites in South London in order to establish current and future waste management capacity within the plan area. A number of data sources were used, including discussions with site owners and EA 'active sites', Waste Data Interrogator (WDI) and environmental permitting data (using 2017 as the baseline year).

3.18 In line with the Intend to Publish London Plan 2019, waste is deemed to be 'managed' where:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra definition as a minimum²².

3.19 Where material is bulked at transfer stations for transportation to other waste management facilities, this capacity is not included as a contribution towards the apportionment targets. However, where a proportion of the incoming waste is recycled, this recycling capacity has been included.

3.20 Table 3.4 below provides a breakdown of existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment for household and C&I waste. Where relevant, opportunities to increase capacity are identified, such as intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses.

3.21 Waste facilities in the planning pipeline were identified which, if given permission, would also contribute towards meeting any shortfall in waste management capacity. Exempt sites, which do not require an environmental permit, have also been included where capacity meets the requirements of the London Plan.

3.22 The waste capacity information in Table 3.4 has been revised following consultation on the SLWP Issues and Preferred Options document in order to accommodate new waste throughput figures and to reflect the latest information from site owners as to which sites have potential for intensification. In addition, a number of sites have been amended or deleted as follows:

- Site C2 (Croydon Car Spares, Croydon) has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties;
- Site C3 (Curley Skip Hire, Croydon) has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses;
- Site C4 (Days Aggregates): The estimated throughput of C&D waste at this site has been increased from 0 to 178,593 tonnes per annum following consultation with the site owner;
- Site C5 (Factory Lane Waste Transfer Station) has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners; and
- Site K1 (Chessington Equestrian Centre) has been deleted because it is a temporary site which is closing soon.

²² refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns

3.23 The most significant outcome of the above changes (arising from the increased throughput figures for the Days Aggregates site C4) is that the overall current throughput of C&D waste across the four boroughs has increased from 241,682 to 420,275 tonnes per year.

3.24 Table 3.4 shows that the current capacity for the management of household and C&I waste in South London is 946,345 tonnes per annum. This represents a capacity surplus of 16,595 tonnes per annum compared to the combined apportionment of 929,750 tonnes per annum for 2036.

3.25 The overall current throughput of C&D waste across the four boroughs, at 420,275 tonnes per year, now exceeds forecast C&D arisings at the end of the plan period in 2036 (414,380 tonnes per annum) by +5,895, where there was previously an estimated shortfall of 172,698 tonnes per annum.

Table 3.4 Sites Counting Towards the Apportionment and C&D Targets (updated)

| Ref | Name | Household/C&I (tpa) | C&D (tpa) | Potential for Intensification |
|------------------------|--|---------------------|----------------|-------------------------------|
| Croydon | | | | |
| C1 | Able Waste Services | 0 | 43,268 | |
| C4 | Days Aggregates Purley Depot | 0 | 178,593 | |
| C5A | Factory Lane Waste Transfer Station | 0 | 0 | Yes |
| C5B | Factory Lane Reuse and Recycling Centre site | 9,623 | 5,206 | |
| C6 | Fishers Farm Reuse & 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 | |
| C12 | Stubbs Mead Depot | 0 | 0 | |
| C13 | Solo Wood Recycling | 5,000 | 0 | Yes |
| CEX | Exempt Sites | 2,580 | 0 | |
| | Croydon Total | 32,883 | 227,067 | |
| Kingston | | | | |
| 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 | 35,642 | 0 | |
| Merton Capacity | | | | |
| M1 | B&T@Work | 0 | 0 | |
| M2 | European Metal Recycling | 70,100 | 0 | |
| M3 | Deadman Confidential | 9,866 | 0 | |
| M4 | Garth Road Re-use and Recycling Centre | 15,704 | 0 | |
| M5 | Garth Road Transfer Station | 0 | 0 | |
| M6 | George Killoughery | 0 | 0 | |
| M7 | LMD Waste Management (Abbey Industrial Estate) | 0 | 20,774 | |
| M8 | LMD Waste Management Wandle Way | 0 | 33,845 | |
| M9 | Maguire Skips (Wandle Way) | 0 | 0 | |
| M10 | Powerday (Weir Court) | 0 | 42,856 | |

| Ref | Name | Household/C&I (tpa) | C&D (tpa) | Potential for Intensification |
|----------------------------------|--|---------------------|----------------|-------------------------------|
| M11 | Morden Transfer Station | 0 | 0 | |
| M12 | NJB Recycling | 0 | 18,030 | |
| M13 | One Waste Clearance | 13,453 | 4,547 | |
| 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 | |
| M18 | Wandle Waste Management | 0 | 0 | |
| MEX | Exempt Sites | 1,000 | 0 | |
| | Merton Total | 213,179 | 150,183 | |
| Sutton Capacity | | | | |
| S1 | 777 Recycling Centre | 20,625 | 32,972 | |
| S2 | Beddington Farmlands ERF | 275,000 | 0 | |
| S3 | Cannon Hygiene | 0 | 0 | |
| 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 | 664,641 | 43,025 | |
| South London Capacity | | | | |
| | Croydon | 32,883 | 227,067 | |
| | Kingston | 35,642 | 0 | |
| | Merton | 213,179 | 150,183 | |
| | Sutton | 664,641 | 43,025 | |
| | South London Total | 946,345 | 420,275 | |
| South London Capacity Gap | | | | |
| | South London Capacity (2017 baseline year) | 946,345 | 420,275 | |
| | South London Apportionment/Forecast for 2036 | 929,750 | 414,380 | |
| | Capacity Gap/ Surplus | +16,595 | +5,895 | |

Source: Anthesis Consultants 2019 (incorporating subsequent amendments 2020)

3.26 More detailed site profiles are set out in Appendix 4 of the Technical Paper, including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility and planning constraints. Further information on exempt sites and assumed capacities are provided in Section 5.2.3 of the Technical Paper.

4. Sustainability Appraisal and Strategic Environmental Assessment

Government Guidance and best practice

4.1. The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of the new South London Waste Plan (SLWP) is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended.

Main Stages of Appraisal

4.2. Government guidance identifies five main stages of appraisal (A to E) that should be carried out as part of the preparation of all development plan documents (DPDs), including jointly prepared plans such as the SLWP. Each stage consists of a number of 'key tasks' as outlined below.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

4.3. Stage A, to be undertaken as part of the evidence-gathering process, consist of the following tasks:

- **Task A1:** Identifying other relevant policies, plans and programmes, and sustainability objectives which are likely to influence the options to be considered (Section 5);
- **Task A2:** Collecting 'baseline' information to enable the impacts of policy options on sustainability objectives to be predicted and monitored (Section 6);
- **Task A3:** Identifying sustainability issues and environmental problems as the basis for defining key issues for the plan to address (Section 7);
- **Task A4:** Developing the SA Framework, consisting of sustainability objectives, indicators and targets, in order to test the environmental, social and economic effects of the plan (Section 8); and
- **Task A5:** Consulting on the scope of the SA on the basis of a scoping report presenting the outcome of Stage A.

4.4. The SA Scoping Report, published for public consultation between 16 September and 21 October 2019, presents the outcome of Stage A in relation to the appraisal of the emerging SLWP.

Stage B: Developing and Refining Options and Assessing Effects

4.5. Stage B, which has been carried out as part of the process of identifying SLWP issues and preferred options, involves:

- **Task B1:** Testing plan objectives against the SA Framework to ensure compatibility;
- **Task B2:** Developing plan options, working with the community and stakeholders, in order to achieve the objectives and contribute to sustainable development;
- **Task B3:** Predicting the social, economic and environmental effects of the plan options against the SA Framework and comparing with the 'no plan' and 'business as usual' scenarios;
- **Task B4:** Evaluating the effects of the plan in terms of their significance and the overall sustainability of each option, including the 'preferred option';
- **Task B5:** Considering ways of mitigating adverse effects and maximising beneficial effects; and
- **Task B6:** Proposing measures to monitor the significant effects of plan implementation.

Stage C: Preparing the Sustainability Appraisal Report

4.6. The SA Report, which must be prepared prior to publication, is the key output of the appraisal process:

- **Task C1:** Preparing the SA Report.

4.7. The SA Report should present the outcome of Stages A and B and clearly show that the SEA Directive's requirements have been met in terms of providing information on the likely significant effects on the environment, the reasons for selecting the alternatives dealt with and measures to prevent, reduce or offset any potentially adverse effects.

4.8. In the context of the emerging SLWP, Task C1 has been undertaken in two stages (i) the preparation of the SA Report on SLWP 'Issues and Preferred Options' which was published for public consultation as part of the Regulation 18 process between 31 October and 22 December 2020; and (ii) the SA Report on the SLWP Submission Version (this document) which has been published for public consultation between xxx MONTH and yyy MONTH as part of the Regulation 19 process.

Stage : Consulting on Preferred Options

4.9. Stage D involves the following Tasks:

- **Task D1:** Public participation on Preferred Options and the SA Report to give the public and statutory bodies an opportunity to comment;
- **Task D2(i):** Appraising significant changes which may have been incorporated within the plan prior to submission;
- **Task D2(ii):** Appraising significant changes resulting from representations; and
- **Task D3:** Making decisions and providing information through the production of an Adoption Statement to accompany the adopted plan. The Adoption Statement will outline how the findings of SA have been taken into account and how sustainability considerations have been integrated into the plan.

Stage E: Monitoring the significant effects of implementing the plan

4.10. Stage E requires the significant effects of the plan to be monitored in order to measure its performance against sustainability objectives and inform future policy revisions:

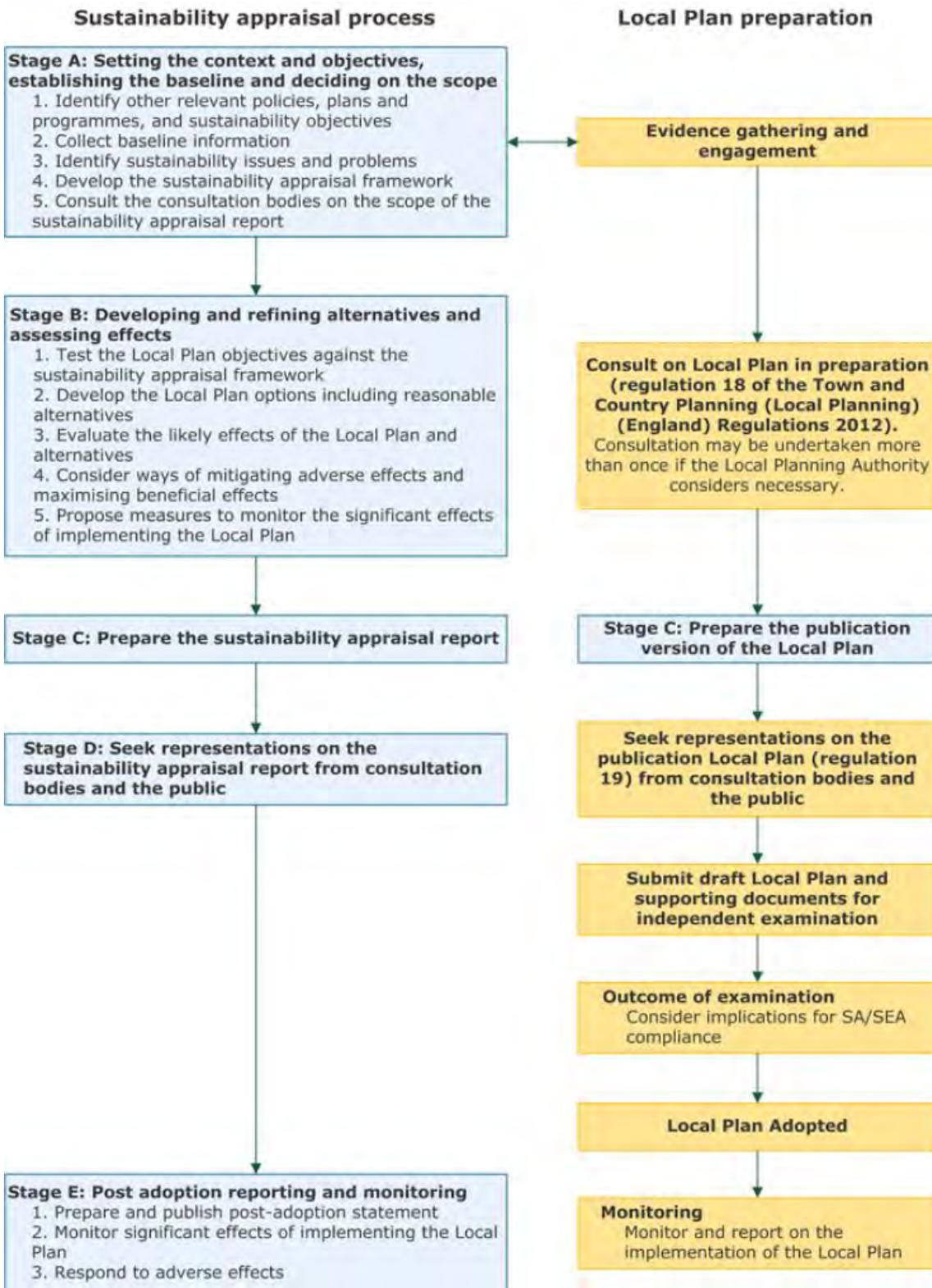
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

4.11. In line with Government guidance, Authority Monitoring Reports (AMRs) should include the findings of plan and SA monitoring. In the case of the SLWP, it is intended that the Sutton AMR will provide the means for reporting on the significant effects of the plan in order to measure its performance against the sustainability objectives, indicators and targets making up the SA Framework (see Section 9).

Key Outputs of Appraisal

4.12. Figure 4.1 shows main stages of SA in relation to the plan-making process.

Figure 4.1: Main Stages of SA in relation to the DPD Process



4.13. Table 4.1 sets out the key outputs of the SA process in relation to the new SLWP in terms of the expected timescale for the preparation of SA Reports for public consultation.

Table 4.1: Key Outputs of the SA process

| Stage of Plan Preparation | Key Appraisal Outputs (publication of SA Reports) | Timescale |
|--|---|--|
| Evidence Gathering | <ul style="list-style-type: none"> SA Scoping Report <i>SA Tasks A1-A5</i> | Consultation with relevant bodies 16 Sept – 22 Oct 2019 |
| Consultation on Issues and Options | <ul style="list-style-type: none"> SA Report on Issues & Options Equalities Impact Assessment (EqIA) report Habitats Regulations Assessment (HRA) screening <i>SA Tasks B1-B6</i> | 31 October - 22 December 2019 |
| Consultation on draft SLWP Proposed Submission | <ul style="list-style-type: none"> SA Report on Proposed Submission EqIA HRA (if required) <i>SA Tasks C1 and D1-D2</i> | XXXXX |
| Submission of draft SLWP incorporating minor changes to the Secretary of State | <ul style="list-style-type: none"> SA Report on Submission Draft incorporating minor changes EqIA HRA (if required) <i>SA Tasks C1 and D1-D2</i> | XXXXX |
| Examination-in-Public | <i>SA Tasks C1 and D1-D2</i> | XXXXX |
| Inspector's Report | <i>SA Tasks C1 and D1-D2</i> | XXXXX |
| Adoption of SLWP incorporating modifications | <ul style="list-style-type: none"> SA Report on modifications arising from Inspector's Report <i>SA Task D3</i> | XXXXX |
| Post-adoption | <ul style="list-style-type: none"> ongoing monitoring of SLWP (via AMRs) <i>SA Tasks E1 and E2</i> | XXXXX |

Equalities Impact Assessment

4.14. An Equalities Impact Assessment (EqIA) is defined by the Equality and Human Rights Commission²³ as *"a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody"*. EqIAs help local planning authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should therefore inform policy preparation from the earliest stages of plan making.

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

²³ further details are available on at <http://www.equalityhumanrights.com>

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

4.17. A full EqIA report has therefore been prepared and included in this document as Appendix 1.

Habitats Regulations Assessment (HRA)

4.18. The purpose of the Habitats Regulation Assessment (HRA) of land use plans (often referred to as 'Appropriate Assessment') is to ensure that the protection and integrity of European nature conservation sites (also known as the Natura 2000 network) is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that a HRA must be carried out on all land use planning documents. This requirement has subsequently been implemented in the UK through an amendment to the 1994 Conservation (Natural Habitats) Regulations (August 2007). The regulations are responsible for safeguarding conservation sites of EU importance such as Special Protection Areas (SPAs), Special Areas for Conservation (SACs) and international RAMSAR sites.

4.19. Government guidance identifies three steps to the HRA process (1) likely significant effects (2) appropriate assessment and ascertaining the effect on site integrity, and (3) mitigation and alternative solutions. Task 1 of the HDA process, which identifies whether a plan is 'likely to have a significant effect' on a European site, is referred to as 'screening' under the Regulations.

4.20. An HRA screening report has therefore been prepared and included in this document as Appendix 2.

5. Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

Policy review

5.1 A comprehensive review of all international, national, regional and local policies, plans and programmes relevant to the South London Waste Plan (SLWP) has been carried in order to identify key sustainability objectives for the purpose of appraisal and waste management issues to be addressed in the Plan.

5.2 This chapter outlines the policy context within which the plan is being prepared at the European, national, subregional and local level. Details of the review findings are set out in Chapter 2 of the South London Waste Technical Paper (Anthesis, June 2019) and Section 5 of the SA Scoping Report (September 2019).

International context

European Union (Withdrawal Agreement) Act 2020 ('Brexit')

5.3 The EU (Withdrawal Agreement) Act 2020, which was given Royal Assent on 23 January 2020, transposed the current framework of environmental regulation set out in EU Directives into UK law and therefore provides some degree of certainty in terms of policy direction for the immediate future.

EU²⁴ Waste Framework Directive 2008

5.4 The EU Landfill Directive 1999/31/EC aims to minimise the negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements and setting the following targets for the reduction of biodegradable municipal waste going to landfill:

- by 2010 to reduce the biodegradable municipal waste disposed to landfill to 75% of that produced in 1995;
- by 2013 to reduce the biodegradable municipal waste disposed to landfill to 50% of that produced in 1995; and
- by 2020 to reduce the biodegradable municipal waste disposed to landfill to 35% of that produced in 1995.

EU Waste Framework Directive 2008

5.5 Article 28 of the EU Waste Framework Directive 2008 requires all Member States to produce a Waste Management Plan. This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery installations. In the UK, these locational criteria are deferred to the Local Plans or waste plans prepared by local planning authorities. The new SLWP will therefore form part of the UK's Waste Management Plan. The Government's Resources and Waste Strategy (see below) commits to reviewing the Waste Management Plan for England in 2019.

Waste Electrical and Electronic Equipment Directive

5.6 The Waste Electrical and Electronic Equipment Directive 2002/96/EC (or 'WEEE' Directive) seeks to address the increasingly rapid growth of waste electrical and electronic equipment and sets out measures to promote the re-use, recycling and recovery of such wastes in order to reduce the need for disposal.

²⁴ while the UK left the EU on 31 January 2020, all relevant EU Directives have been transposed into UK law through the EU (Withdrawal Agreement) Act 2020

EU Review of Waste Policy and Legislation

5.7 The 'Review of Waste Policy and Legislation' published by the EU in December 2015, introduces higher targets for recycling and for the phasing out the landfilling of organic and recyclable materials. This means that any additional waste management facilities required to meet these new targets must be planned for in waste plans. The London Environment Strategy (GLA, 2017) includes similar targets, such as recycling 65% of municipal waste by 2030, and these have been incorporated into the draft new London Plan (GLA, 2017).

UNESCO World Heritage Convention

5.8 The 'Convention Concerning the Protection of the World Cultural and Natural Heritage' was adopted by UNESCO in 1972 and has been signed by 193 countries.

European Convention on the Protection of Archaeological Heritage

5.9 The Convention for the protection of the architectural heritage of Europe is a legally binding instrument setting a framework for an accurate conservation approach in Europe.

National context

Localism Act 2011 and the Duty to Co-operate

5.10 Section 110 of the Localism Act 2011 prescribes the 'Duty to Co-operate' between local authorities in order to ensure that they work together on strategic cross-boundary issues such as waste planning.

HM Government 25 Year Environment Plan

5.11 A Green Future: Our 25 Year Plan to Improve the Environment', sets out the following strategic goals for 'Maximising resource efficiency and minimising environmental impacts at end of life':

- (i) Achieving zero avoidable plastic waste by the end of 2042;
- (ii) Reducing food supply chain emissions and waste;
- (iii) Reducing litter and littering;
- (iv) Improving management of residual waste;
- (v) Cracking down on fly-tippers and waste criminals; and
- (vi) Reducing the impact of wastewater.

UK Resources and Waste Strategy (December 2018)

5.12 The Government's 'Resources and Waste Strategy for England'²⁵ was introduced in December 2018, building on the earlier publication of 'A Green Future: Our 25 Year Plan to Improve the Environment'²⁶ in January 2018. In seeking to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy, the strategy:

- commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in order to align national policies with the Resources and Waste Strategy;
- introduces proposals to ensure that producers will pay for the disposal of their own packaging; set a tax on plastic packaging which does not include 30% recycled content; establish deposit return schemes; deliver streamlined recycling and food waste collection services for households and businesses; and improve the efficiency of energy recovery facilities;
- commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-based targets; and
- seeks to tackle the problem of waste crime, which cost the English economy around £600 million in 2016, harms local communities and which pays no heed to the value of scarce resources.

²⁵ available at <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

²⁶ available at <https://www.gov.uk/government/publications/25-year-environment-plan>

Waste Management Plan for England

5.13 The Waste Management Plan for England (Defra, 2013) identifies how much waste is generated in England, how that waste is managed and future waste infrastructure needs in order to meet the obligations of the revised EU Waste Framework Directive. It confirms that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England.

National Planning Policy Framework

5.14 The revised National Planning Policy Framework (NPPF) (MHCLG, February 2019) states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence which should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. Local Plans should be:

- (a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- (b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- (c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- (d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

5.15 The South London Waste Technical Paper (Anthesis, June 2019) focuses on meeting the above requirements, including identifying South London’s objectively assessed waste management needs (positively prepared); enabling an appropriate strategy to be identified for managing South London’s waste (justified); identifying strategic waste exports from South London (effective); and ensuring conformity with waste policies (consistent with national policy).

5.16 The revised NPPF sets out the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate (DtC). When assessing if the SLWP is sound, the Inspector will look to statements of common ground between the four boroughs and neighbouring authorities in London and the South East for evidence that cross-boundary strategic matters have been addressed and that they have complied with the DtC.

National Planning Policy for Waste (NPPW)

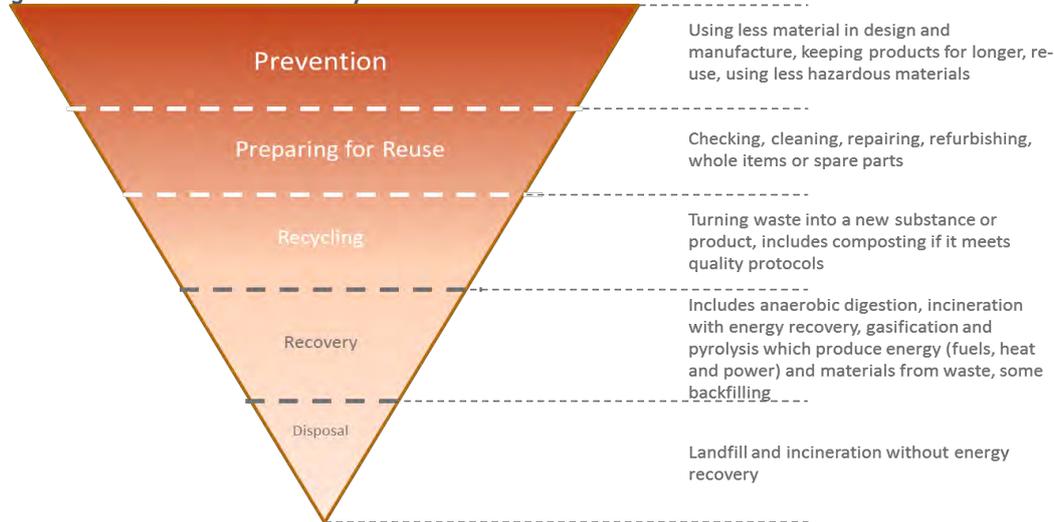
5.17 The National Planning Policy for Waste²⁷ (DCLG, 2015) sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW requires waste planning authorities to:

- prepare Local Plans or local waste plans which drive waste management up the waste hierarchy (see Figure 5.1);
- have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management;
- allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan (suitable areas can be identified as well as sites

²⁷ the National Planning Policy for Waste is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

- for new or enhanced waste management facilities);
- provide additional capacity through facilitating the maximum use of existing facilities;
- direct new waste facilities towards industrial locations;
- identify broad types of waste management facility that would be appropriately located on allocated sites or in suitable areas in line with the waste hierarchy; and
- seek opportunities to co-locate waste management facilities together with complementary activities.

Figure 5.1: The Waste Hierarchy



5.18 Local waste plans must be underpinned by a proportionate evidence base which establishes the need for waste management facilities and identifies suitable sites and areas to meet this need. The evidence base should include details of:

- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings.

5.19 Information on existing waste management facilities should include:

- site location details – site name, operator, address, postcode, borough, grid reference etc;
- type of facility - what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details - reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;
- capacity information - licensed and permitted throughput by waste type;
- site lifetime or maximum capacity - it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources - origin of wastes managed, broken down by type and location;
- outputs from facility - recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information - potential of site for increasing throughput, adding further capacity, other waste management uses etc.

5.20 The Technical Paper provides up-to-date information relating to each of the above points and therefore provides a sound evidence base for preparing the new SLWP.

National Planning Practice Guidance (PPG)

5.21 National Planning Practice Guidance²⁸ (DCLG, 2015) states that a Local Plan relating to waste should identify sufficient opportunities to meet the identified needs of an area for the management of waste in order to drive waste management up the waste hierarchy. Suitable sites and areas for waste management should be identified in appropriate locations to deal with the following streams:

- municipal/household;
- commercial/industrial;
- construction/demolition;
- low level radioactive;
- agricultural;
- hazardous; and
- waste water.

5.22 Local plans should not generally prescribe the waste management techniques or technologies that will be used to deal with specific waste streams in the area (i.e. waste Local Plans should be 'technology blind'). Rather, the Plan should identify the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area. The government tries not to direct towards one waste technology above any others, when there may be a number of technologies, both existing and developing, that might deliver the same favourable outcome.

5.23 Waste planning authorities should engage and collaborate with local communities in an early and meaningful way when identifying options for managing waste. This is particularly the case when considering proposals for waste management facilities such as incinerators which can be locally controversial. To be effective, engagement should be proactive to ensure that local communities are able to understand the range of options that are available and their implications.

5.24 The PPG emphasises that waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place.

Planning (Listed Buildings and Conservation Areas) Act 1990

5.25 The Planning (Listed Buildings and Conservation Areas) Act changed laws relating to the granting of planning permission for building works, with a particular focus on listed buildings and conservation areas. It provides specific protection for buildings and areas of special architectural or historic interest and introduced special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as for Conservation Areas.

Ancient monuments and Archaeological Areas Act 1979

5.26 The Ancient monuments and Archaeological Areas Act 1979 provides specific protection for monuments of national interest

London context

London Environment Strategy

5.27 The Mayor's London Environment Strategy (GLA, May 2018) sets out the following overarching objectives for waste:

- Objective 7.1: Drive resource efficiency to significantly reduce waste, focusing on food waste and single use packaging waste;

²⁸ National Planning Practice Guidance (PPG) on waste is available at <https://www.gov.uk/guidance/waste#preparing-local-plans>

- Objective 7.2: Maximise recycling rates;
- Objective 7.3: Reduce the environmental impact of waste activities; and
- Objective 7.4: Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.

5.28 The Environment Strategy seeks to reduce reliance on landfill and incineration by working towards a 'circular economy'. This radical change in dealing with London's waste will include:

- significantly cutting waste that is produced, with a focus on single use plastics and food waste;
- encouraging greater reuse of materials to minimise the use of virgin resources, including accelerating the take up of business models that promote the circular economy;
- once waste reduction and reuse opportunities have been exhausted, maximising the recycling of materials (including anaerobic digestion) that are left from our homes and businesses;
- where all opportunities to reduce, reuse and recycle materials have been exhausted, maximising the value of truly non-recyclable waste by generating low carbon energy from it to limit the environmental impact, and leave very little waste going to landfill; and
- ensuring that there is sufficient infrastructure in London to support the shift to a circular approach, helping to create opportunities for businesses developing reuse, repair and remanufacturing services

5.29 Updated targets for recycling are set out which are due to be taken forward in the new London Plan due for publication later in 2020:

- no biodegradable or recyclable waste to landfill by 2026; and
- 65% of 'municipal' (household and business) waste recycled by 2030, comprising 50% LACW recycled by 2025; and 75% business recycled by 2030.

5.30 Importantly, modelling undertaken on behalf of the Mayor suggests that if London achieves the reduction and recycling targets set out in the Environment Strategy, it will have sufficient energy from waste (EFW) capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational (see Objective 7.4). :

London Plan 2016

5.31 The London Plan (GLA, March 2016) states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan. Land to manage borough apportionments should be brought forward through protecting and facilitating the maximum use of existing waste sites. Boroughs are encouraged to collaborate by pooling their apportionment requirements.

5.32 As shown below in Table 5.1, the current apportionment target for the four South London boroughs by 2021 is 669,000 tpa.

Table 5.1: London Plan 2016 apportionment targets for South London (tonnes per annum)

| | Apportionment 2021 | Apportionment 2036 |
|-------------|--------------------|--------------------|
| Croydon | 199,000 | 247,000 |
| Kingston | 119,000 | 148,000 |
| Merton | 192,000 | 239,000 |
| Sutton | 159,000 | 198,000 |
| SLWP | 669,000 | 832,000 |

5.33 Many of the waste targets in the current London Plan have been superseded by the London Environment Strategy (see above). For example, recycling targets for local authority collected waste (LACW) and commercial and industrial (C&I) waste have been pushed back from 2020 to 2025 and 2030 respectively.

Draft New London Plan 2020

5.34 The Intend to Publish London Plan (GLA, December 2019) sets out the following revised targets waste which reflect those set out in the London Environment Strategy:

- the equivalent of 100% of London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste; and
- 95% beneficial use of excavation waste.

5.35 New apportionment targets²⁹ for each borough are introduced in Table 9.2 under draft Policy SI8 on 'Waste Capacity and Net Self-Sufficiency' in order to meet the net self-sufficiency target for household and C&I waste. It can be seen from Table 5.2 that the combined apportionment targets for South London from 2021 to 2041 are higher than those set by the current London Plan 2016.

Table 5.2: Intend to Publish London Plan 2019 apportionment targets for South London (tpa)

| | Apportionment 2021 | Apportionment 2041 |
|-------------|--------------------|--------------------|
| Croydon | 252,000 | 268,000 |
| Kingston | 187,000 | 199,000 |
| Merton | 238,000 | 253,000 |
| Sutton | 210,000 | 224,000 |
| SLWP | 887,000 | 944,000 |

5.36 Draft London Plan Policy SI8 has been updated to align with the NPPW approach to identifying sites and/or areas to meet identified waste management need. In addition, the definition of managed waste has been extended to include the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum. This increases the amount of existing capacity which counts towards managing apportioned waste.

5.37 The supporting text to draft Policy SI8 makes clear that boroughs are expected to identify suitable additional capacity for those waste streams not apportioned by the London Plan, where practicable.

London Infrastructure Plan (update 2015)³⁰

5.38 The London Infrastructure Plan 2015 'Moving from waste to reuse' seeks to move away from the 'take-make-dispose' economy towards a more sustainable future where goods are designed to be reused and recycled as part of the so-called circular economy. The plan sets out a commitment to embedding circular economy principles across all areas of infrastructure delivery in London.

5.39 The GLA and the London Water and Recycling Board (LWARB) have developed a Route Map for London's transition to a circular economy³¹. This identifies the need for London's waste authorities,

²⁹ the evidence base underlying the revised apportionments are set out in 'Forecasts for Household and C&I Waste: Report 1' (SLR, March 2017) (NLP/SI/003) at https://www.london.gov.uk/sites/default/files/forecasts_for_household_and_commercial_industrial_waste_report_1_-_gla_waste_arisings_model.pdf

³⁰ the London Infrastructure Plan 2015 is available at

[file:///civvmi_vnas07/MyDocs/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20\(1\).pdf](file:///civvmi_vnas07/MyDocs/patrick.whitter/Downloads/London%20Infrastructure%20Plan%202050%20Consultation%20(1).pdf)

³¹ LWARB Circular Economy Route map at <https://www.lwarb.gov.uk/what-we-do/circular-london/circular-economy-route-map/>

with assistance from the LWARB, to introduce more consistent collection and recycling services that will help to increase the capture of materials from individuals and businesses. Improved waste collection is needed, both under the current system and to support the circular economy. Circular economy principles can also be promoted by designing waste out of manufactured products, so that they can be disassembled and reused with the minimum of effort and energy.

5.40 The estimated economic benefits of accelerating London's move to a circular economy include:

- reduced costs of up to £5 billion from 2016 to 2050;
- a new economic sector bringing employment opportunities and sparking innovation;
- the increased ability of industry to hedge its exposure to global commodity price volatility and supply disruption by reusing waste materials ;
- reduced toxic waste;
- reduced wider impacts, for example on transport. With a move to a circular economy, London is likely to require much less waste disposal infrastructure by 2050; and
- around 40 new facilities in addition to London's existing capacity. Most of them will be required to help reuse and recycle materials, predominantly repair workshops, disassembly lines and recycling and reprocessing facilities.

5.41 The move towards a circular economy is already underway across London, with many companies already prospering as a result of it. It is clear that for companies to reuse resource inputs to the maximum degree, they need to increase the rate at which their products and components are collected and reused with materials recovered.

The Mayor's Sustainable Design and Construction SPG

5.42 The Mayor's supplementary planning guidance (SPG) on 'Sustainable Design and Construction' (GLA, 2014)³² sets out best practice guidance on circular economy principles aimed at reducing waste, increasing recovery from demolition materials, maximising pre-fabricated elements and providing sufficient space for storing recyclables and residual waste ready for collection. This will be superseded upon adoption of the New London Plan and the Mayor's Circular Economy Statement.

The Mayor's Municipal Waste Management Strategy 2011

5.43 The Mayor's Municipal Waste Management Strategy³³ (GLA, 2011) was produced by the previous Mayor and has been replaced by the London Environment Strategy 2017.

The Greater London Historic Environment Record

5.44 The Greater London Historic Environment Record (GLHER) provides some of the most up-to-date information on London's historic environment.

Local context

South London Waste Plan 2012

5.45 The South London Waste Plan (SLWP) (March 2012) sets out the long-term vision, spatial strategy and policies for the sustainable management of waste within the four partner boroughs until 2022. It identifies 27 existing permitted facilities, 11 industrial areas suitable for new waste facilities and sets out policies for determining planning applications relating to waste facilities. The SLWP forms part of the local development plan for each of the partner boroughs.

³² https://www.london.gov.uk/sites/default/files/qla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf

³³ the Mayor's Municipal Waste Management Strategy 2011 is available at <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-municipal-waste-management-strategy>

5.46 The current SLWP plan period is now coming to an end and a new waste plan for the south London is required in order to meet the updated apportionment and new waste management targets set out in the in both the draft new London Plan and the London Environment Strategy (see above).

South London Waste Partnership Joint Municipal Waste Strategy (2011)

5.47 The South London Waste Partnership is the disposal authority for household waste collected by the South London Boroughs. The Partnership's Joint Municipal Waste Strategy (2011) is a statement of intent to guide the authorities in undertaking their individual waste management activities. It covers the period from 2010 to 2020 and includes a strategic goal, objectives and a number of measurable targets.

London Borough of Croydon

5.48 Policy SP6 of Croydon's Local Plan (February 2018) identifies the current SLWP as the key delivery vehicle for waste planning and commits to working in partnership with Kingston, Merton and Sutton to plan for waste across the South London area. Strategic Objective 9 seeks to ensure the responsible use of land and natural resources and management of waste in order to mitigate and adapt to climate change. Policy DM13 requires developers to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design.

Royal Borough of Kingston-upon-Thames

5.49 Policy CS9 of Kingston's Core Strategy (April 2012) sets out strategic waste management priorities and targets for the borough and commits to working in partnership with Croydon, Merton and Sutton to plan for waste across the South London area. Core Strategy Objective 4 seeks to promote sustainable waste management within the four-borough waste partnership by preparing a Joint Waste Plan to identify suitable waste management sites to meet the London Plan apportionment, safeguard existing sites and set out appropriate planning policies to ensure high standards of development.

London Borough of Merton

5.50 Policy CS17 of Merton's Core Planning Strategy (July 2011) sets out strategic priorities and targets for the borough and commits to working in partnership with Croydon, Kingston and Sutton to plan for waste across the South London area. Strategic Policy 1 seeks to apply the waste hierarchy and exploit opportunities to utilise energy from waste.

5.51 Merton's emerging (Stage 2) Local Plan (October 2018) includes an updated strategic policy which identifies the SLWP as the key delivery vehicle for waste planning. Strategic Objective 4 aim to apply the waste hierarchy and exploit opportunities to utilise energy from waste. Policies CC8.10 and CC8.15 both include a commitment to support the principles of the circular economy.

London Borough of Sutton

5.52 Sutton's Local Plan (February 2018) does not include a specific policy for waste, but instead defers to the current SLWP in the supporting text for Policy 14 on 'Industrial Land'.

5.53 Policy 15 states that the council will support proposals from green business where they are suitable for the location proposed.

6. Baseline (Task A2)

What is baseline information?

6.1 The term 'baseline information' refers to the existing environmental, economic and social characteristics of the plan area, and their likely direction of change without any change to current planning policies. The information set out in this chapter has been used as part of the scoping process as the basis for identifying the key issues and problems to be addressed by the new South London Waste Plan (SLWP) (Section 7) and for developing the proposed SA Framework as the basis for assessing the likely impacts of alternative policy options on the social, economic and environmental objectives of sustainable development (Section 8).

6.2 The revised NPPF (MHCLG, 2019) emphasises that an up-to-date evidence base is essential for producing a sound development plan document (DPD). The environmental, social and economic baseline set out below is therefore derived from the following sources:

- Authority Monitoring Reports (AMRs) for 2018-19 prepared by the respective boroughs;
- studies undertaken by the four boroughs or by consultants as part of the evidence base for the Local Plan including employment land reviews, open space studies, infrastructure studies and Strategic Flood Risk Assessment (SFRA);
- studies undertaken by the GLA or by consultants as part of the evidence base for the new London Plan, including the London Industrial Land Demand Study (CAG, 2017);
- the London Employment Sites database;
- development monitoring data via the London Development Database;
- socio-economic and environmental information from the GLA London Datastore, including borough population and household projections; and
- mid-year estimates and population data from the Office for National Statistics.

6.3 This chapter provides an summary of the current baseline situation in terms of the key environmental, social and economic trends likely to be affected by the new plan.

The Plan Area

6.4 The South London Waste Plan area, consisting of the four boroughs of Kingston-upon-Thames, Sutton, Merton and Croydon, is shown in Figure 6.1. While there are pockets of social deprivation, the area as a whole is relatively prosperous and noted for its high environmental quality.

6.5 According to the latest mid-year estimates published by the Office of National Statistics (ONS) in 2019, the combined population of the four SLWP boroughs reached a total of 971,527 in mid 2018, representing an increase of 58,250 (+6.4%) since the 2011 Census. According to the GLA's housing-led projections³⁴, updated in February 2020, this population is expected to increase by 100,167 or +10.1% from a total of 988,295 in 2021 to 1,088,462 by 2036.

6.6 In terms of the future spatial development of the four partner boroughs, the draft new London Plan identifies Opportunity Areas centred upon each of the three Metropolitan Centres of Croydon, Sutton and Kingston together with a further Opportunity Area at Wimbledon/ Colliers Wood/ South Wimbledon. Each of these areas of change is expected to be a focus for significant growth and economic regeneration over the lifetime of the plan to 2041. However the ability of these Opportunity

³⁴ the GLA's latest housing-led population (2018-based) population projections are available at <https://data.london.gov.uk/dataset/housing-led-population-projections>

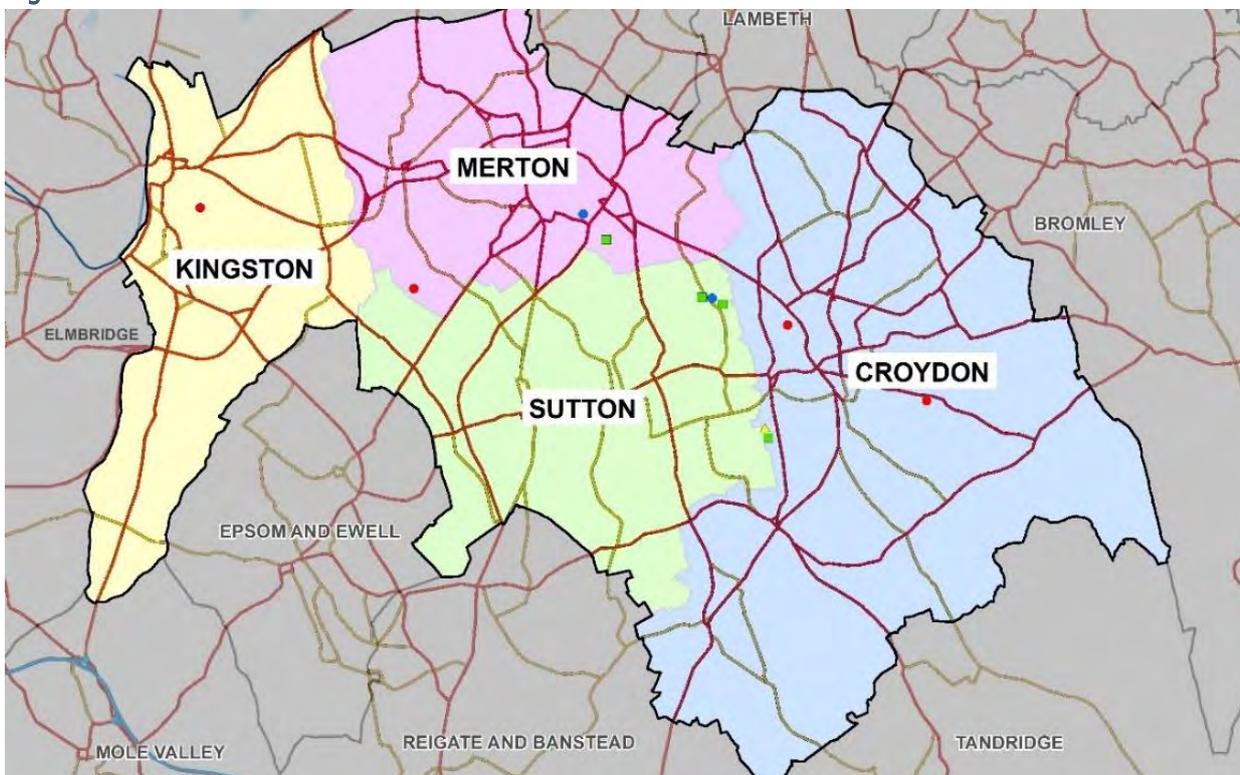
Area areas to accommodate the additional housing and jobs needed over the coming decades will require major investment in strategic transport infrastructure, namely Crossrail 2 and the Tramlink extension.

6.7 The importance of Tramlink as one of the Mayor's Strategic Infrastructure Priorities is reflected in the Key Diagram of the draft new London Plan which identifies Croydon, Sutton and Wimbledon town centres as key elements of the 'Trams Triangle'. Tramlink has already transformed travel opportunities within South London and the proposal to extend the tram to Sutton Town Centre and potentially beyond to the proposed London Cancer Hub (LCH) provides the potential for improving transport accessibility to the town centre and supporting the delivery of additional homes and jobs. The 'Trams Triangle' provides important links to central London and Gatwick via the Brighton mainline and, in the future, Crossrail 2. There are also important links to the east and west, where improved transport connections to Heathrow will be beneficial for places to the west of South West London

6.8 The plan area contains a total of 780 ha of designated industrial land, including 10 Strategic Industrial Locations (SILs), as well as numerous smaller sites. As of 2017, 35 ha of this land (4.5%) was vacant. Many businesses, particularly in the Wandle Valley, are in a supply-chain relationship with the central London economy. Although development opportunities in outer London tend to be concentrated in the town centres and are smaller by comparison with Inner London boroughs, the Wandle Valley corridor offers diverse regeneration potential, including the Wimbledon/ Colliers Wood/ South Wimbledon Opportunity Area. There is also a Strategic Office Location at Croydon Town Centre.

6.9 There is a total of 3,439 ha of green belt and 2,458 ha of Metropolitan Open Land (MOL) in the plan area. This accounts for 28.7% of the land area of the four boroughs.

Figure 6.1: The South London Waste Plan Area.



London Borough of Croydon

6.10 The London Borough of Croydon has an area of 8,650 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Croydon reached a total of 383,838 in mid 2018.

6.11 There is a total of 163.0 ha of designated industrial land within the borough, of which 9.6 ha (5.9%) is currently vacant. There are two Strategic Industrial Locations (SILs) at Marlpit Lane and Imperial Way/ Purley Way, accounting for 118.6 ha.

6.12 With over 380 retail outlets, Croydon Town Centre is one of four Metropolitan Centres in South London, and has been identified as both an Opportunity Area and a Strategic Office Location in the draft new London Plan. Croydon Town Centre is supported by nine district centres at Addiscombe, Coulsdon, New Addington, Norbury, Purley, Selsdon, South Norwood, Thornton Heath, Upper Norwood/ Crystal Palace.

6.13 Croydon is well located near to Gatwick Airport and within easy reach of central London and the south coast.

6.14 Croydon has 2,195 ha of Green Belt and 413 ha of MOL, together accounting for 30.2% of the land area of the borough.

Royal Borough of Kingston-upon-Thames

6.15 The Royal Borough of Kingston-upon-Thames has an area of 3,726 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Kingston reached a total of 174,978 in mid 2018. Kingston's predominant character is of leafy suburbs with relatively low density development of two or three-storey houses with gardens, though there are some higher density neighbourhoods, mainly around Kingston and Surbiton town centres and along major roads.

6.16 Kingston Town Centre is a Metropolitan Centre and identified as an Opportunity Area in the draft new London Plan. There are three district centres: New Malden in the east, Surbiton just south of Kingston, and Tolworth close to the A3. The council has identified four areas where there is scope for accommodating additional growth, at Kingston Town Centre; Norbiton, London Road and Cambridge Estate; New Malden and Tolworth.. However, with the introduction of Crossrail 2 is operational, the borough is expected to benefit from more Crossrail 2 stations than any other and the arrival of the new, higher frequency, higher capacity service will enable significant additional growth opportunities in these areas. It will improve Kingston's attractiveness as an office location and therefore support additional commercial growth in the town centre, building on links with Kingston University and Kingston College.

London Borough of Merton

6.17 Merton is the one of the smallest boroughs in London with an area of 3,762 ha. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Merton reached a total of 210,327 in mid 2018.

6.18 Crossrail 2 and associated investment are expected to have a significant impact on the future regeneration and growth of Merton. This will help support the delivery of housing, mixed-use and commercial development across the borough and the opportunity areas located within it. The step change in transport capacity and connectivity offered by Crossrail 2 is expected to transform

Wimbledon into a major transport hub with opportunities for interchange with National Rail, trams and the Underground.

6.19 The redevelopment required to deliver the Crossrail 2 tunnel offers the opportunity to plan for significant growth and intensification, with residential and commercial development. Crossrail 2 will strengthen Wimbledon's role as a 'major town centre', and as a location with potential for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres.

6.20 Merton has many impressive open spaces including Mitcham and Wimbledon Commons that makes the borough one of the greenest boroughs in London. Around 18% of the borough's area is open space, compared to the 10% London average. The quality and historical character of the borough reflects the number of high quality heritage areas designated as Conservation Areas.

London Borough of Sutton

6.21 The London Borough of Sutton (4,485 ha) forms an important part of the Wandle Valley, one of three growth corridors identified as having 'city region importance' in the current London Plan 2016. According to the latest mid-year estimates published by the ONS in 2019, the resident population of Sutton reached a total of 204,775 in mid-2018.

6.22 Industrial activity is concentrated in the Borough's established industrial areas, three of which are identified as strategic industrial locations (SILs). These are Kimpton, Beddington and a small part of the Purley Way SIL. Each of these is served by key radial routes into London from the M25. Elsewhere, a number of smaller industrial sites are being transformed in housing developments, for example the Felnex Trading Estate and Wandle Valley Trading Estate in Hackbridge

6.23 Sutton Town Centre is one of four Metropolitan Centres in South London and an Opportunity Area in the draft new London Plan. The town centre has 188 retail units within an attractive pedestrianised environment. Sutton Town Centre is complemented by seven district centres, at Cheam, North Cheam, Wallington, Worcester Park, Hackbridge, Rosehill and Carshalton, along with many local centres and dispersed parades.

6.24 Sutton has number of high quality heritage areas designated as Conservation Areas and Areas of Special Local Character (ASLCs). In contrast, there are pockets of relative social deprivation, characterised by limited access to employment, social infrastructure and transport services, including areas to the north of the Borough, such as Rosehill, St Helier and the Wrythe, and parts of South Beddington.

POPULATION

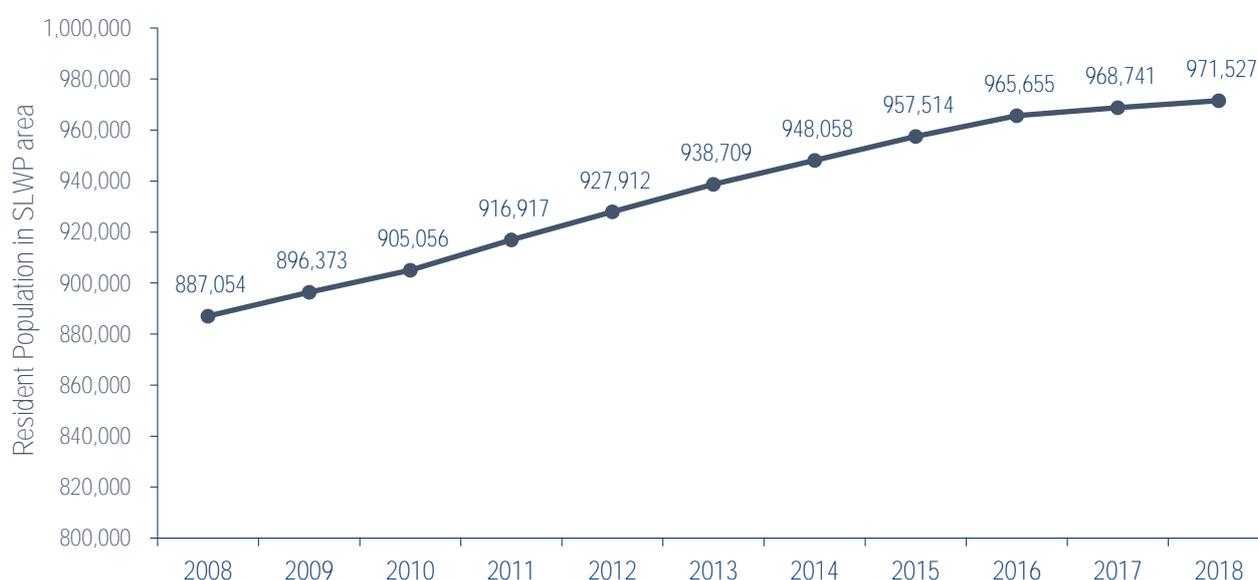
Resident population

Table 6.1: Resident Population for SLWP boroughs and plan area

| | Population mid-2017 | Population mid-2018 | Births |
|-------------|---------------------|---------------------|----------------|
| Croydon | 384,837 | 385,346 | +5,582 |
| Kingston | 174,609 | 175,470 | +2,089 |
| Merton | 206,052 | 206,186 | +3,160 |
| Sutton | 203,243 | 204,525 | +2,533 |
| SLWP | 968,741 | 971,527 | +13,364 |

Source: ONS Mid-Year Estimates (26 June 2019)

Figure 6.2: Population growth in the SLWP area 2008-18



Components of population change 2017 to 2018

Table 6.2: Components of population change for SLWP boroughs and the plan area

| | Population mid-2017 | Population mid-2018 | Births | Deaths | Net Migration | Overall Net change |
|-------------|---------------------|---------------------|----------------|---------------|---------------|--------------------|
| Croydon | 384,837 | 385,346 | +5,582 | -2,564 | -2,509 | +509 |
| Kingston | 174,609 | 175,470 | +2,089 | -1,108 | -120 | +861 |
| Merton | 206,052 | 206,186 | +3,160 | -1,287 | -1,739 | +134 |
| Sutton | 203,243 | 204,525 | +2,533 | -1,545 | 294 | +1,282 |
| SLWP | 968,741 | 971,527 | +13,364 | -6,504 | -4,074 | +2,786 |

Source: ONS Mid-Year Estimates (26 June 2019)

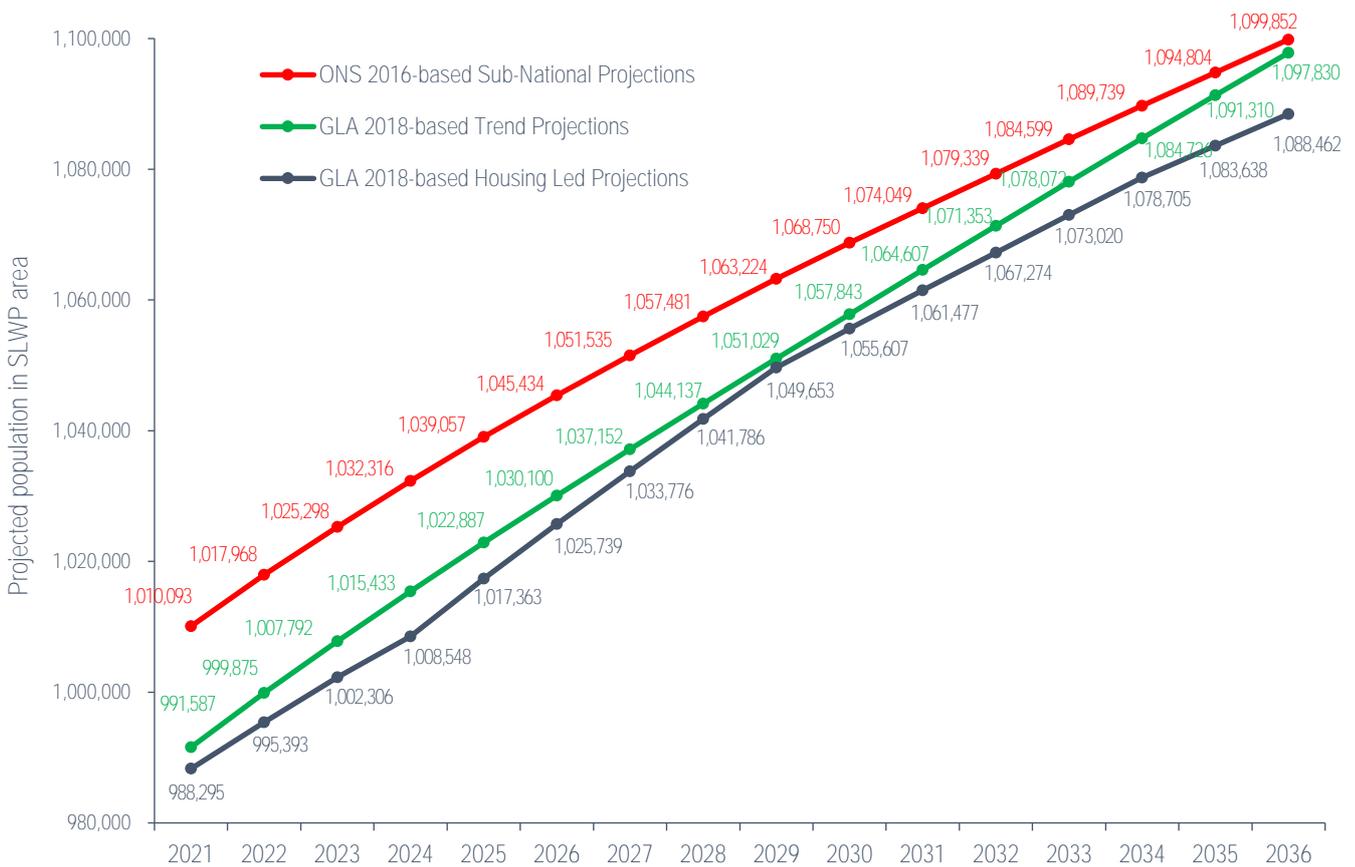
Population projections

Table 6.3: Population projections for SLWP boroughs and plan area 2021-36

| | Population Projections | | | | | | | | |
|-------------|--|------------------|-----------------------------|--|------------------|-----------------------------|--|------------------|---------------------------|
| | GLA 2018-based Housing Led ³⁵ | | | GLA 2018-based Central Trend ³⁶ | | | ONS 2016-based Subnational Projections | | |
| | 2021 | 2036 | Change | 2021 | 2036 | Change | 2021 | 2036 | Change |
| Croydon | 391,463 | 436,023 | +44,560 (+11.4%) | 389,681 | 427,936 | +38,255 (+9.8%) | 400,227 | 436,252 | +36,024 (+9.0%) |
| Kingston | 177,502 | 206,226 | +28,724 (+16.2%) | 178,748 | 200,221 | +21,473 (+12%) | 185,017 | 205,061 | +20,045 (+10.8%) |
| Merton | 212,413 | 229,298 | +16,885 (+7.95%) | 214,549 | 237,457 | +22,908 (+10.7%) | 212,915 | 225,972 | +13,057 (+6.1%) |
| Sutton | 206,917 | 216,915 | +9,998 (+4.8%) | 208,609 | 232,216 | +23,607 (+13.0%) | 211,933 | 232,566 | +20,633 (+9.7%) |
| SLWP | 988,295 | 1,088,462 | +100,167 (+10.1%) | 991,587 | 1,097,830 | +106,243 (+11.3%) | 1,010,093 | 1,099,852 | +89,759 (+8.9%) |

Sources: GLA 2018-based Trend Projections; GLA 2018-based Housing Led Projections (both updated Feb 2020); and ONS 2016-based Population Projections

Figure 6.3: Population projections for SLWP boroughs and plan area 2021-36



Sources: GLA 2016-based Trend; GLA 2016-based Housing-Led; and ONS 2016-based population projections

³⁵ GLA 2018-based housing-led projections incorporating the 2016 Strategic Housing Land Availability Assessment (SHLAA) at <https://data.london.gov.uk/dataset/housing-led-population-projections>

³⁶ GLA 2018-based central trend population projections are available on the London Datastore at <https://data.london.gov.uk/dataset/trend-based-population-projections>

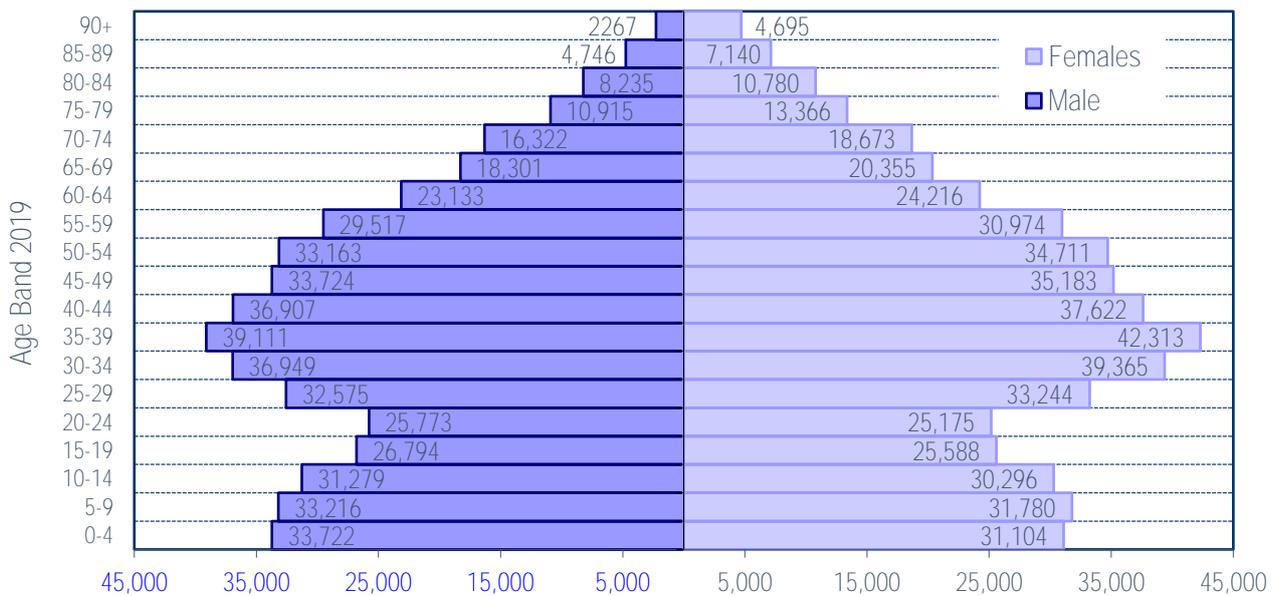
Population structure

Table 6.4: Population structure for SLWP boroughs and plan area 2019

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

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

Figure 6.4: Population structure by gender and age band for the plan area 2019



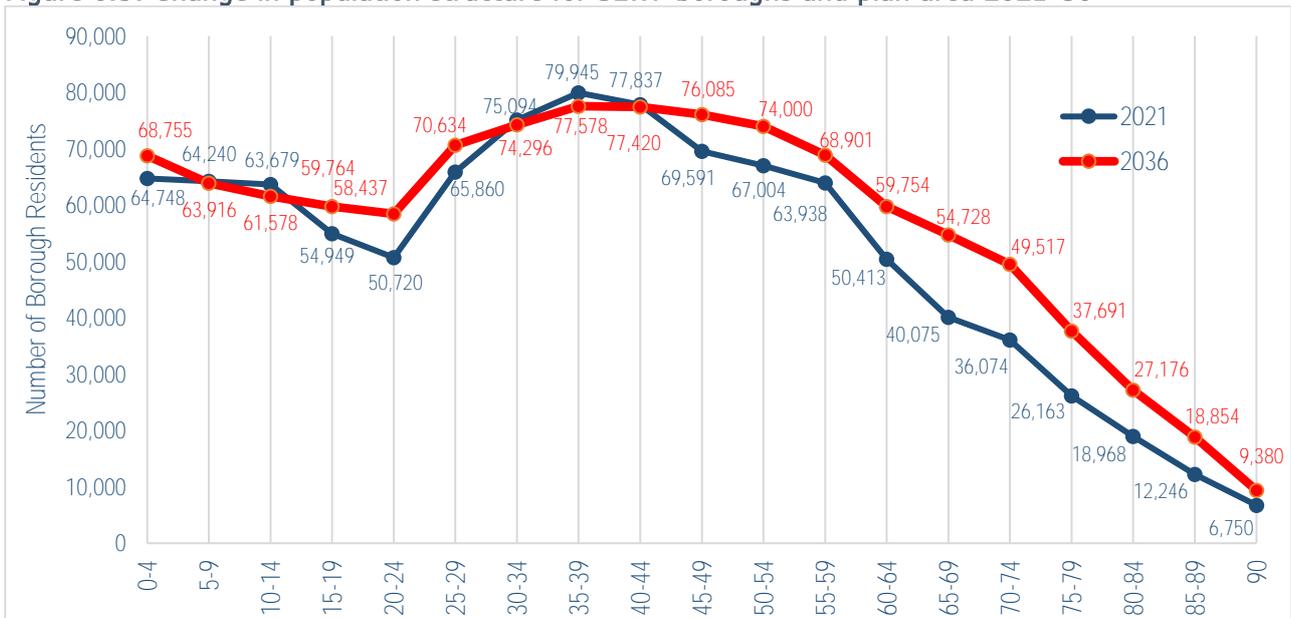
Projected Change in Population Structure

Table 6.5: Change in population structure for SLWP boroughs and plan area 2021-36

| Resident Population | | | | |
|---------------------|------------------------------|------------------|------------------|--------------------------|
| | Age band | All persons 2021 | All persons 2036 | Projected change |
| Croydon | Borough residents aged 0-15 | 82,921 | 84,572 | +1,651 (+2%) |
| | Borough residents aged 16-64 | 253,102 | 270,057 | +16,955 (+6.7%) |
| | Borough residents aged 65+ | 55,440 | 81,394 | +25,954 (+46.8%) |
| | Total | 391,463 | 436,023 | +44,560 (+11.4%) |
| Kingston | Borough residents aged 0-15 | 33,463 | 35,196 | +1,733 (+5.2%) |
| | Borough residents aged 16-64 | 118,660 | 134,831 | +16,171 (+13.6%) |
| | Borough residents aged 65+ | 25,379 | 36,198 | +10,819 (+42.6%) |
| | Total | 177,502 | 206,225 | +28,723 (+16.2%) |
| Merton | Borough residents aged 0-15 | 44,945 | 44,476 | -469 (-1%) |
| | Borough residents aged 16-64 | 140,434 | 148,264 | +7,830 (+5.6%) |
| | Borough residents aged 65+ | 27,034 | 36,558 | +9,524 (+35.2%) |
| | Total | 212,413 | 229,298 | +16885 (+7.9%) |
| Sutton | Borough residents aged 0-15 | 43,230 | 42,325 | -905 (-2.1%) |
| | Borough residents aged 16-64 | 131,263 | 131,393 | +130 (+0.1%) |
| | Borough residents aged 65+ | 32,423 | 43,196 | +10,773 (+33.2%) |
| | Total | 206,916 | 216,914 | +9,998 (+4.8%) |
| SLWP area | Residents aged 0-15 | 204,559 | 206,569 | +2,010 (+1%) |
| | Residents aged 16-64 | 643,459 | 684,545 | +41,086 (+6.4%) |
| | Residents aged 65+ | 140,276 | 197,346 | +57,070 (+40.7%) |
| | Total | 988,294 | 1,088,460 | +100,166 (+10.1%) |

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

Figure 6.5: Change in population structure for SLWP boroughs and plan area 2021-36



Population density

Table 6.6: Population density

| | Population mid-2018 | Area (ha) | Population density (residents/ha) |
|-------------|---------------------|---------------|-----------------------------------|
| Croydon | 385,346 | 8,650 | 44.5 |
| Kingston | 175,470 | 3,726 | 47.1 |
| Merton | 206,186 | 3,762 | 54.8 |
| Sutton | 204,525 | 4,385 | 46.6 |
| SLWP | 971,527 | 20,523 | 47.3 |
| London | 8,908,081 | 159,471 | 55.9 |

Source: ONS Mid-Year Estimates (26 June 2019)

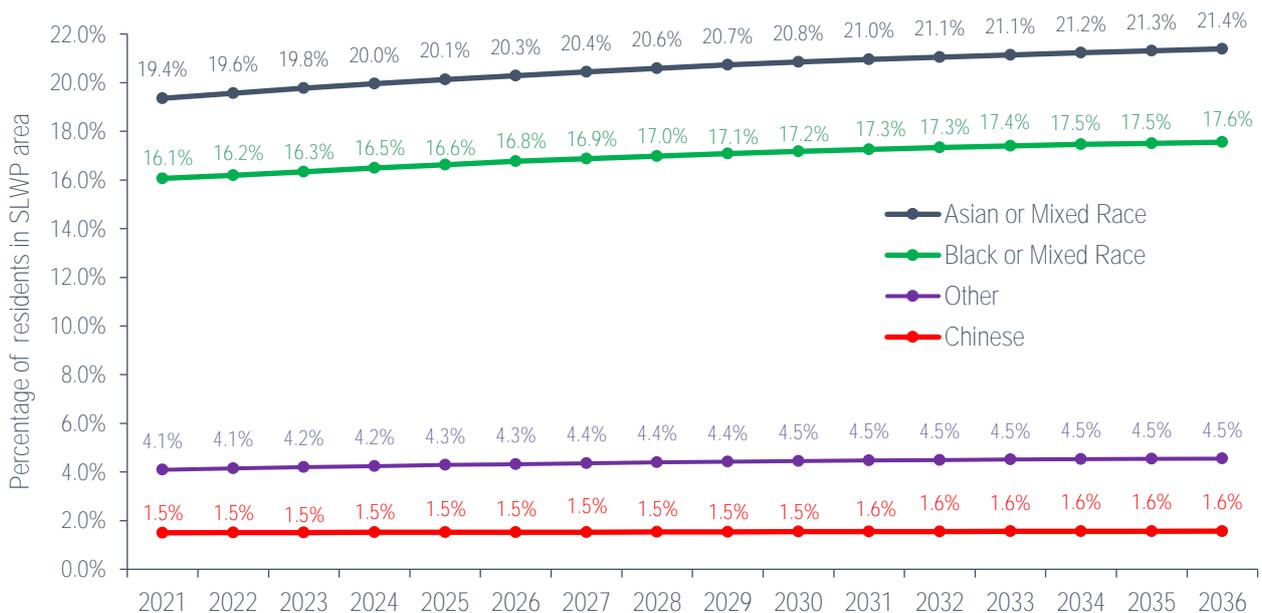
Ethnicity

Table 6.7: Ethnic breakdown for SLWP boroughs and plan area 2019

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

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

Figure 6.6: Projected ethnic breakdown for plan area 2021-36



Religion

Table 6.8: Religion for SLWP boroughs and plan area 2019

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

Source: GLA Datastore – Annual Population Survey (June 2019)

Household growth

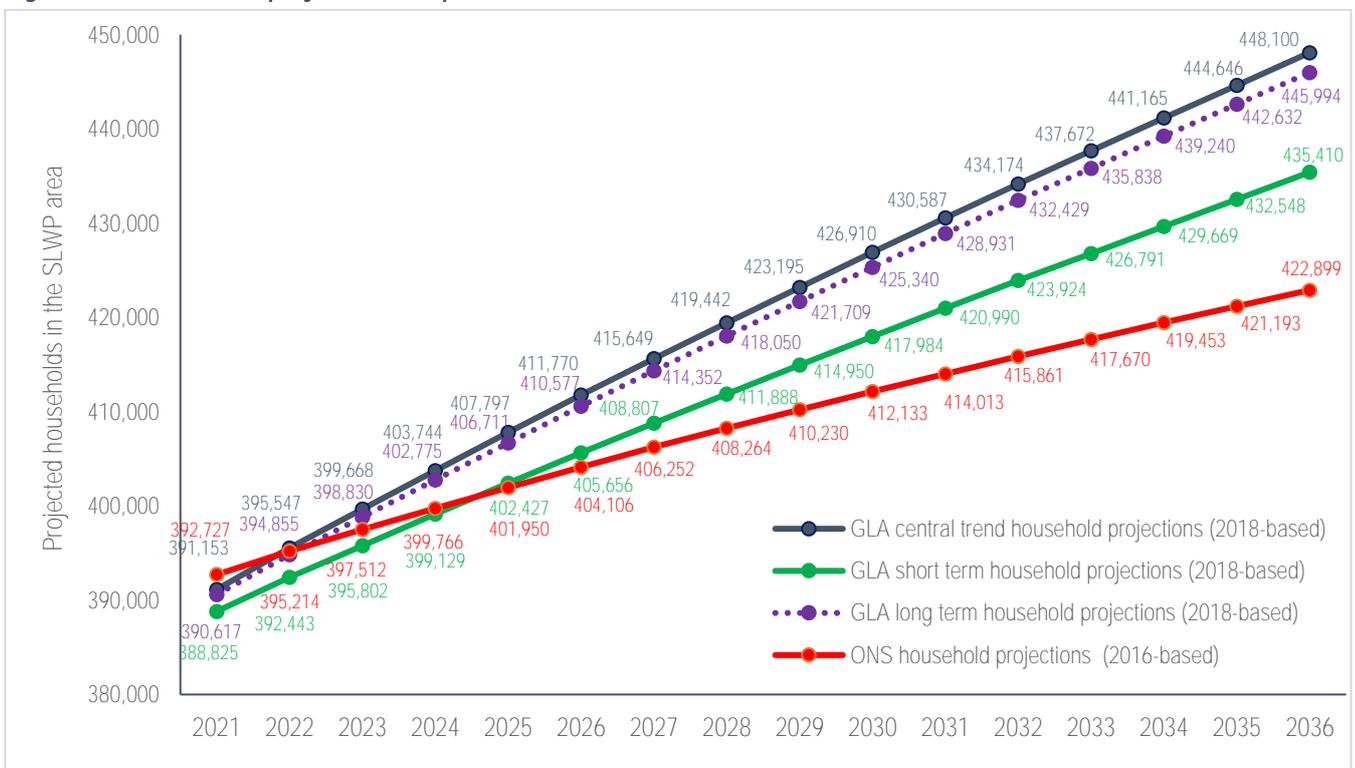
Table 6.9: Household growth within SLWP boroughs and plan area from 2011 to 2019

| | Number of households | | |
|-------------|----------------------|----------------|----------------------|
| | 2011 | 2019 | Change since 2011 |
| Croydon | 145,988 | 153,958 | +7,970 (+5.5%) |
| Kingston | 63,994 | 69,047 | +5,053 (+7.9%) |
| Merton | 79,157 | 80,188 | +1,031 (+1.3%) |
| Sutton | 78,661 | 82,820 | +4,159 (+5.3%) |
| SLWP | 367,800 | 386,013 | +18,213 (+5%) |

Sources: GLA Central Trend Projection 2018-based³⁷

Household projections 2021-36

Figure 6.7: Household projections for plan area 2021-36



³⁷ the 'central' trend projection informs the London Plan and is considered by the GLA to be the most appropriate for medium to long-term strategic planning. This model is based on past trends in births, deaths and migration to project future populations in London using 10-year average domestic migration rates, international migration in-flows and international out-migration rates

Housing tenure by household

Table 6.10: Household tenure by household for SLWP boroughs and plan area

| | Number of households | | | | Total |
|-------------|------------------------|------------------------|--------------------------------------|------------------------------|----------------|
| | Own Outright | Mortgage | Rented from Council or Reg. Provider | Rented from private landlord | |
| Croydon | 38,300 (26.2%) | 54,100 (37%) | 25,700 (17.6%) | 28,200 (19.2%) | 146,300 |
| Kingston | 21,800 (33.1%) | 20,200 (30.6%) | 6,200 (9.5%) | 17,700 (26.9%) | 65,900 |
| Merton | 23,400 (28.7%) | 26,700 (32.8%) | 10,200 (12.5%) | 21,200 (26%) | 81,500 |
| Sutton | 25,600 (32.8%) | 28,400 (36.4%) | 8,000 (10.3%) | 16,000 (20.5%) | 78,000 |
| SLWP | 109,100 (29.3%) | 129,400 (34.8%) | 50,100 (13.5%) | 83,100 (22.4%) | 371,700 |

Sources: ONS Annual Population Survey 2019

Car ownership

Table 6.11: Household tenure by household for SLWP boroughs and plan area

| | Cars | Households | Cars per household | London ranking (out of 33 boroughs) |
|---------------|------------------|------------------|--------------------|-------------------------------------|
| Croydon | 141,122 | 153,958 | 0.92 | 13 th (joint) |
| Kingston | 66,239 | 69,047 | 0.96 | 8 th (joint) |
| Merton | 70,113 | 80,188 | 0.87 | 16 th |
| Sutton | 87,727 | 82,820 | 1.06 | 5 th (joint) |
| SLWP | 365,201 | 386,013 | 0.95 | n/a |
| LONDON | 2,661,026 | 3,553,413 | 0.75 | n/a |

Source: DVLA/DfT: Number of Licensed Vehicles (VEH0105) April 2020, and GLA Household Projections Central Trend 2018-based (2019)

Social deprivation

Table 6.12: Index of Multiple Deprivation (IMD 2019) - national ranking

| | Social deprivation ranking compared to the 317 areas in England ³⁸ | | |
|----------|---|--|---|
| | IMD 2015 ³⁹ | IMD 2019 | Change 2015-19 |
| Croydon | 95 th | 108th most deprived in England |  |
| Kingston | 270 th | 273rd most deprived in England |  |
| Merton | 209 th | 213th most deprived in England |  |
| Sutton | 211 th | 226th most deprived in England |  |

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

Table 6.13: Index of Multiple Deprivation (IMD 2019) - London ranking

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

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

³⁸ based on IMD 2019 'rank of average score' (1st = most deprived and 317th = least deprived)

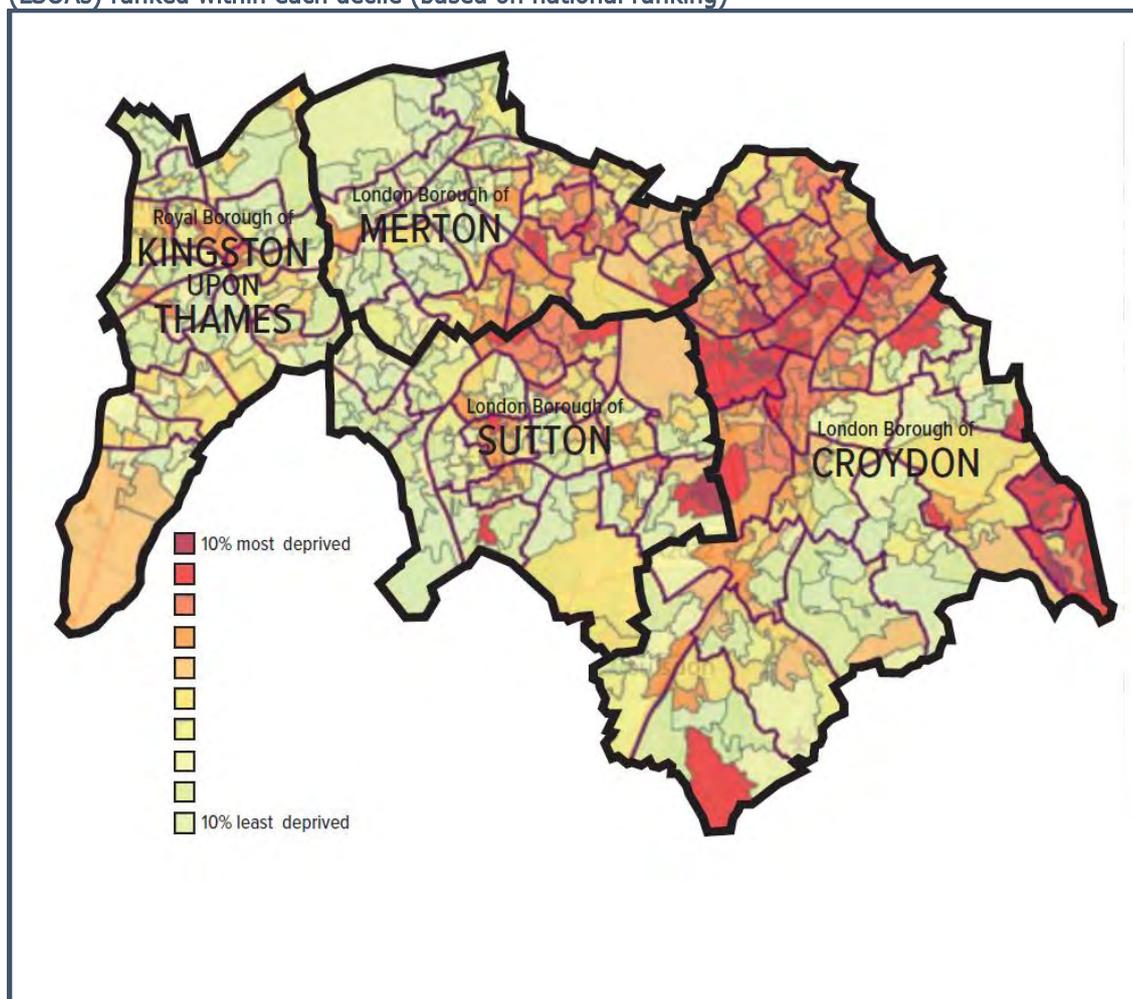
³⁹ 2015 data recast to 2019 lower tier (district) authorities following boundary changes

Table 6.14: Lower Level Super Output Areas (LSOAs) in 10% most deprived LSOAs in England

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

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

Figure 6.8: Index of Multiple Deprivation (IMD 2015) map for SLWP area showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)



Fuel Poverty

Table 6.15: Percentage of fuel poor households for SLWP boroughs and plan area

| | Households | Fuel Poor Households | Proportion of households who are fuel poor (%) |
|-------------|----------------|----------------------|--|
| Croydon | 152,205 | 17,108 | 11.2% |
| Kingston | 66,817 | 6,955 | 10.4% |
| Merton | 82,831 | 9,282 | 11.2% |
| Sutton | 82,077 | 6,897 | 8.4% |
| SLWP | 383,930 | 40,242 | 10.5% |
| LONDON | 3,425,063 | 391,924 | 11.4% |

Source: Sub-regional fuel poverty data, Department for Business, Energy & Industrial Strategy (BEIS) April 2020

ECONOMY

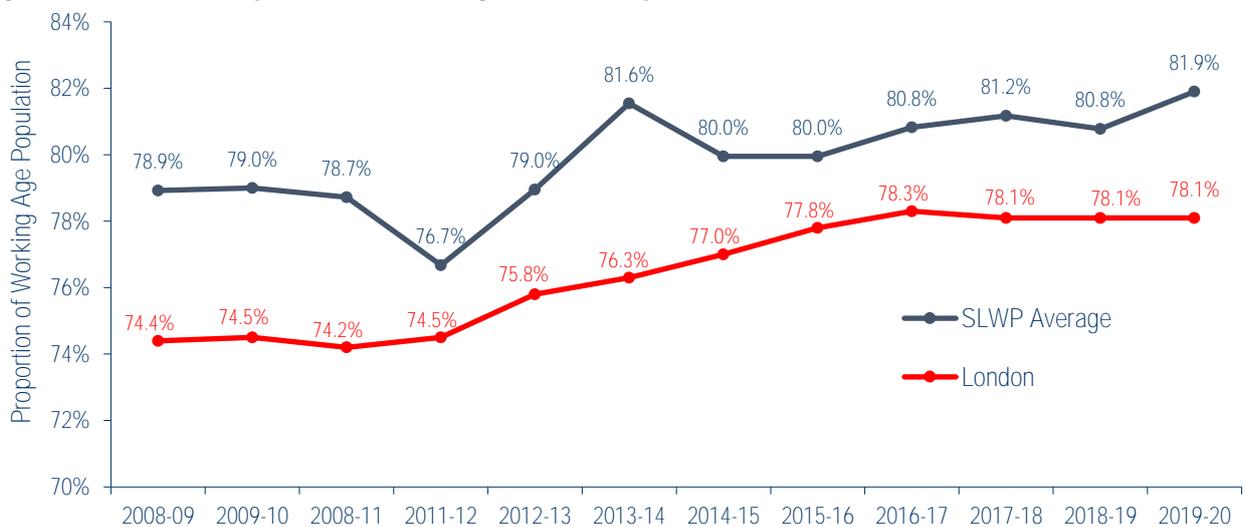
Economic activity

Table 6.16: Proportion of working age population aged 16-64 who are economically active

| | Residents of working age (16-64) | Residents of working age (16-64) who are economically active | Proportion of working age (16-64) residents who are economically active |
|---------------|----------------------------------|--|---|
| Croydon | 247,800 | 205,800 | 83.1% |
| Kingston | 115,800 | 99,000 | 85.5% |
| Merton | 137,000 | 119,800 | 87.4% |
| Sutton | 130,000 | 113,500 | 87.3% |
| SLWP | 630,600 | 538,100 | 85.3% |
| LONDON | 6,014,100 | 4,893,600 | 81.4% |

Source: NOMIS website on behalf of ONS April 2020

Figure 6.9: Economically active residents aged 16-64 for plan area 2008-09 to 2018-19



Employment by occupation - economically active residents 16-64

Table 6.17: Employment by occupation for SLWP boroughs and plan area 2018-19

| Occupation | Croydon | Kingston | Merton | Sutton | SLWP | LONDON |
|--------------------------------|-------------------|-------------------|-------------------|-------------------|----------------------------------|----------------------|
| Managers and Senior Officials | 11.7% (23,200) | 18.1% (17,400) | 14.5% (16,600) | 10.5% (11,200) | 12.7% (68,400) | 13.5% (630,900) |
| Professional Occupations | 22.4% (44,600) | 28.1% (27,000) | 24.5% (28,000) | 24.1% (25,800) | 23.3% (125,400) | 26.5% (1,239,100) |
| Assc Professional & Technical | (31,900) 16.1% | 19.7% (18,900) | 18.8% (21,500) | (18,200) 17% | 16.8% 90,500) | (854,400) 18.3% |
| Administrative and Secretarial | 10% (19,800) | 9.8% (9,400) | 12.1% (13,800) | 11.5% (12,300) | 10.3% (55,300) | 15.8% (408,200) |
| Skilled Trades | 8.7% (17,200) | 7% (6,700) | 7.8% (8,900) | 11.1% (11,800) | 8.3% (44,600) | (325,400) 7.0% |
| Personal service (e.g. caring) | 9.1% (18,000) | 5.4% (5,200) | 6.9% (7,900) | 8.3% (8,900) | 7.4% (40,000) | 7.1% (332,100) |
| Sales/ Customer Services | 7% (13,900) | 4.1% (3,900) | 5.1% (5,900) | 5.2% (5,600) | 5.4% (29,300) | 5.7% (271,700) |
| Plant & Machines Operatives | 3.4% (6,800) | 3.1% (2,800) | 4.4% (5,000) | 5.4% (5,800) | 3.8% (20,400) | 4.5% (208,700) |
| Elementary Occupations | 10% (19,800) | 5.8% (5,600) | 5.9% (6,700) | 6.6% (7,100) | 7.3% (39,200) | 8% (375,900) |

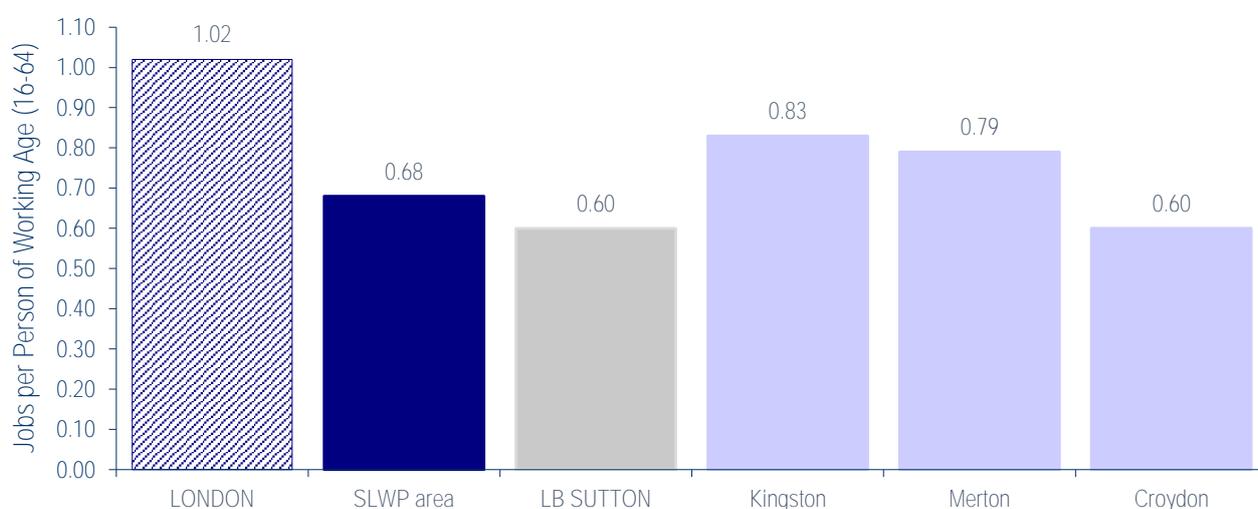
Job Density

Table 6.18: Employee jobs per resident of working age (16-64) for SLWP boroughs 2018

| | Employee Jobs (full-time and part-time) | Residents aged 16-64 | Job Density (Jobs/resident) |
|---------------|--|----------------------|-----------------------------|
| Croydon | 149,000 | 247,800 | 0.6 |
| Kingston | 96,000 | 115,800 | 0.83 |
| Merton | 108,000 | 137,000 | 0.79 |
| Sutton | 78,000 | 130,000 | 0.6 |
| SLWP | 431,000 | 630,600 | 0.68 |
| LONDON | 6,149,000 | 4,893,600 | 1.02 |

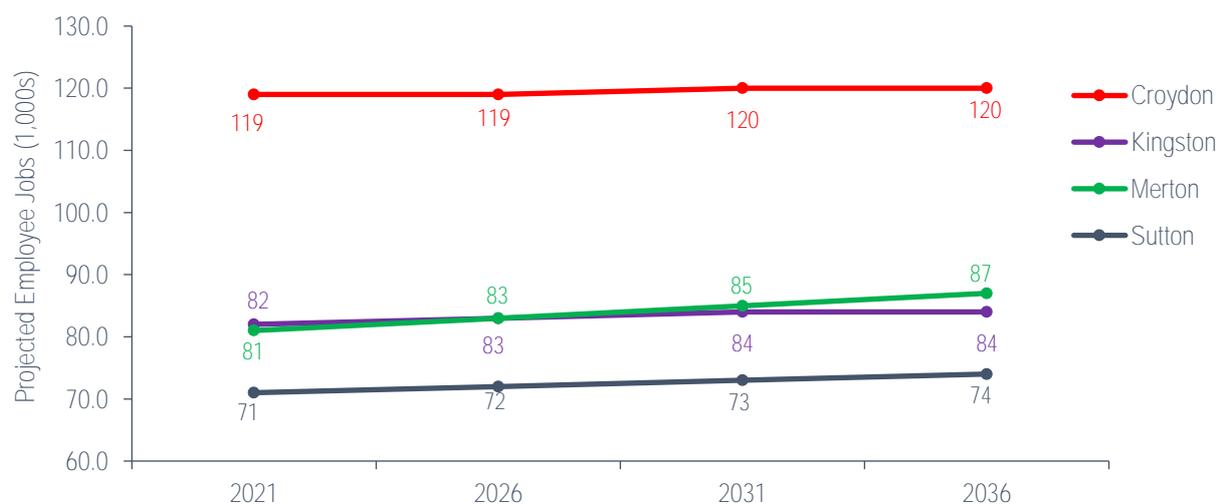
Source: NOMIS website on behalf of ONS September 2019

Figure 6.10: Job Density in LB Sutton and other South London Boroughs 2018



Employment projections

Figure 6.11: Projected growth in employee jobs for SLWP boroughs 2021 to 2036



Source: GLA Employment Projections July 2017⁴⁰

⁴⁰ Long term labour market projections are available on the GLA Datastore at <https://data.london.gov.uk/dataset/long-term-labour-market-projections/resource/28282ee1-5555-4524-ab43-a5df725cac43>

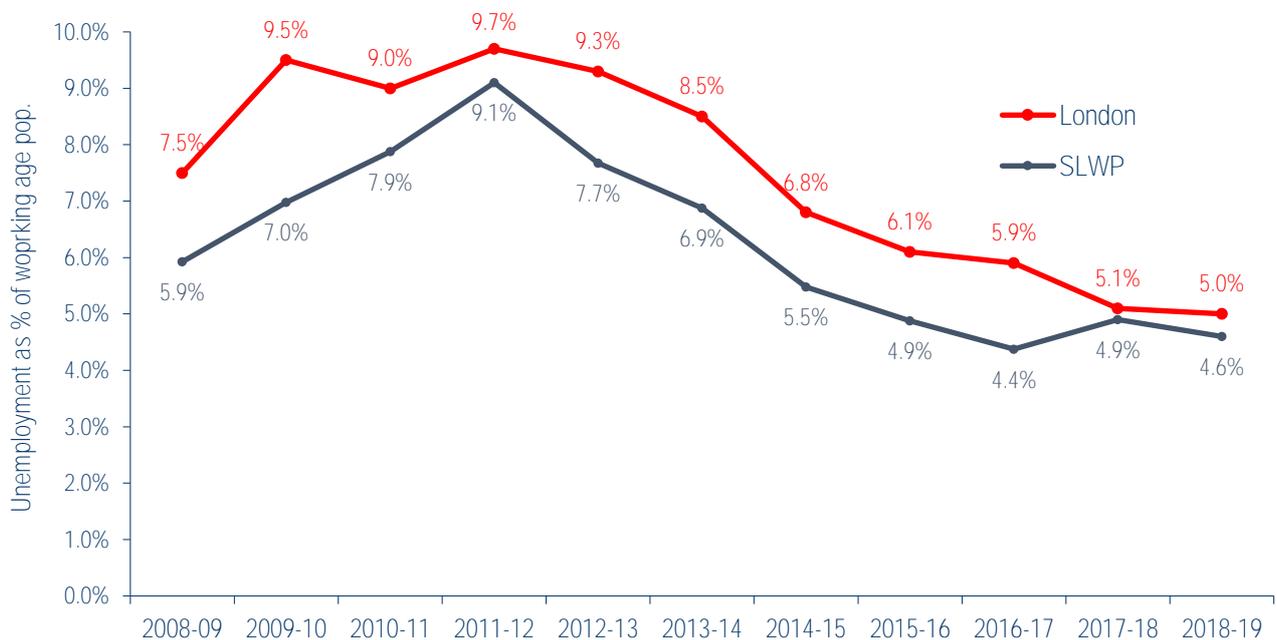
Unemployment

Table 6.19: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs, plan area and London 2018-19

| | Unemployed | Residents of working age (Aged 16-64) | Unemployment rate (%) |
|---------------|----------------|---------------------------------------|-----------------------|
| Croydon | 11,100 | 247,800 | 5.3% |
| Kingston | 3,200 | 115,800 | 3.2% |
| Merton | 5,100 | 137,000 | 4.3% |
| Sutton | 4,700 | 130,000 | 4.2% |
| SLWP | 22,900 | 630,600 | 4.6% |
| LONDON | 224,300 | 4,893,600 | 5% |

Source: NOMIS website on behalf of ONS, April 2020

Figure 6.12: Unemployment rate as a proportion of the economically active population (16-64) for SLWP boroughs 2008-09 to 2018-19



Source: ONS annual population survey/ NOMIS website September 2019

Employment sites

Table 6.20: Strategic Industrial Locations (SILs) within the SLWP boroughs

| | Strategic Industrial Location (SIL) | Area (ha) |
|----------|---|-----------|
| Croydon | Marlpit Lane | |
| | Imperial Way/Purley Way | 24.69 ha |
| Kingston | Barwell Business Park (IBP) | |
| | Chessington Industrial Estate | 34.9 ha |
| Merton | Beverley Way Industrial Area | |
| | Morden Road Factory Estate and Prince George's Road | |
| | North Wimbledon (part) | |
| | Willow Lane, Beddington & Hallowfield Way | 41.45 ha |
| Sutton | Kimpton Industrial Area | 18.8 ha |
| | Beddington Lane | 105.8 ha |
| | Imperial Way | 5.9 ha |

Source: Local Plans

Occupancy of industrial land

Table 6.21: Industrial land in SLWP boroughs and in the plan area: by categorisation (ha)

| | Croydon | Kingston | Merton | Sutton | SLWP |
|--|--------------|--------------|--------------|--------------|--------------|
| Total core & wider uses (ha) | 153.4 | 115.3 | 158.2 | 318.2 | 745.1 |
| Core industrial uses (ha) total | 122.9 | 62.2 | 138.9 | 112.3 | 436.3 |
| <i>Industry (general & light industry)</i> | <i>50.0</i> | <i>27.8</i> | <i>56.5</i> | <i>32.0</i> | 166.3 |
| <i>Warehouses, self storage & open storage</i> | <i>72.9</i> | <i>34.4</i> | <i>82.4</i> | <i>80.3</i> | 270 |
| Wider industrial uses (ha) | 30.5 | 53.1 | 19.3 | 205.9 | 308.8 |
| Vacant industrial land (ha) | 9.6 | 0.9 | 9.4 | 15.1 | 35.0 |
| Total industrial land (ha) | 163.0 | 116.2 | 167.5 | 333.3 | 780.0 |
| Vacancy rate (overall) | 5.9% | 0.8% | 5.6% | 4.5% | 4.5% |

London Industrial Land Demand Study (CAG Consultants, October 2017)

Table 6.22: Industrial land in SLWP boroughs and within the plan area: by designation (ha)

| Designation | Use | Croydon | Kingston | Merton | Sutton | SLWP |
|--|---------------------------------------|--------------|--------------|--------------|--------------|--------------|
| Strategic Industrial Locations (SIL) | Industrial | 82.2 | 38.7 | 105.9 | 120.6 | 347.4 |
| | Vacant industrial land* | 6.5 | - | 6.0 | 3.2 | 15.7 |
| | Non-industrial | 29.9 | 3.4 | 15.3 | 10.8 | 59.4 |
| | Sub-Total | 118.6 | 42.1 | 127.2 | 134.7 | 422.6 |
| | Vacant Land % of SIL | 5.2% | 0.0% | 4.5% | 2.3% | 3.7% |
| Locally Significant Industrial Sites (LSIS) | Industrial | 20.3 | 16.1 | 27.6 | 4.2 | 68.2 |
| | Vacant industrial land* | 1.9 | 0.9 | 2.5 | 0.6 | 5.9 |
| | Non-industrial | 5.4 | 8.0 | 1.7 | 0.6 | 15.7 |
| | Sub-Total | 27.7 | 25.0 | 31.8 | 5.4 | 89.9 |
| | Vacant Land % of LSIS | 6.5% | 3.4% | 7.2% | 10.4% | 6.6% |
| SIL+LSIS | Industrial | 102.5 | 54.7 | 133.5 | 124.9 | 415.6 |
| | Vacant industrial land* | 8.5 | 0.9 | 8.4 | 3.9 | 21.7 |
| | Non-industrial | 35.3 | 11.4 | 17.1 | 11.4 | 75.2 |
| | Sub-Total | 146.3 | 67.0 | 159.0 | 140.2 | 512.5 |
| | Non-designated Industrial land | Industrial | 75.2 | 60.6 | 24.6 | 193.3 |
| | Vacant industrial land* | 1.1 | - | 0.9 | 11.2 | 13.2 |
| Total Designated + Non-Designated (ha) | Industrial | 153.4 | 115.3 | 158.2 | 318.2 | 745.1 |
| | Vacant industrial land* | 9.6 | 0.9 | 9.4 | 15.1 | 35.0 |
| | Non-industrial | 35.3 | 11.4 | 17.1 | 11.4 | 75.2 |
| GRAND TOTAL | | 198.3 | 127.6 | 184.6 | 344.7 | 855.2 |
| Vacant Land (%) | | 4.8% | 0.7% | 5.1% | 4.4% | 4.1% |

London Industrial Land Demand Study (CAG Consultants, October 2017)

Table 6.23: Industrial land in SLWP area: core, wider and non-industrial activities for SLWP boroughs and within the plan area 2016-41

| | Use | Croydon | Kingston | Merton | Sutton | SLWP |
|-----------------------------------|---------------------------------|--------------|--------------|--------------|--------------|--------------|
| Core industrial uses (ha) | Light industry | - | 15.9 | 7.4 | 7.8 | 38.9 |
| | General industry | 42.2 | 11.9 | 49.1 | 24.1 | 127.3 |
| | Warehouses | 63.9 | 33.6 | 72.2 | 76 | 245.7 |
| | Self storage | 4.4 | 0.8 | 3.5 | 4.3 | 13 |
| | Open storage | 4.6 | 0 | 6.7 | 0 | 11.3 |
| | Core Sub-Total | 122.9 | 62.2 | 138.9 | 112.3 | 436.3 |
| Wider industrial uses (ha) | Whole-sale markets | 1.2 | 0.5 | 0 | 0 | 1.7 |
| | Waste management | 5 | 34.2 | 9.4 | 6.6 | 55.2 |
| | Utilities | 18.6 | 16.4 | 7.5 | 193.9 | 236.4 |
| | Land for rail | 5.6 | 1.8 | 0 | 4 | 11.4 |
| | Land for buses | 0.1 | 0 | 2.4 | 1.3 | 3.8 |
| | Docks | 0 | 0.1 | 0 | 0 | 0.1 |
| | Other industrial | 0 | 0 | 0 | 0 | 0 |
| | Wider Sub-Total | 30.5 | 53.1 | 19.3 | 205.9 | 308.8 |
| Vacant land | Vacant industrial land* | 7.4 | 0.2 | 4.2 | 12.6 | 24.4 |
| | Land with vacant buildings | 2.2 | 0.7 | 5.2 | 2.5 | 10.6 |
| Non-industrial uses | Office | 7.4 | 6.5 | 2.8 | 1.3 | 18 |
| | Retail | 15.2 | 2.7 | 12 | 7.1 | 37 |
| | Residential | 8.1 | 0.6 | 0.6 | 0.4 | 9.7 |
| | Recreation & leisure | 0 | 0.3 | 0.5 | 0.6 | 1.4 |
| | Community services | 0.8 | 0.5 | 1.3 | 0 | 2.6 |
| | Mixed-use | 1.4 | 0 | 0 | 0 | 1.4 |
| | Other non-industrial | 2.4 | 0.7 | 0 | 2 | 5.1 |
| | Non-industrial Sub-Total | 35.3 | 11.4 | 17.1 | 11.4 | 75.2 |
| Total: Core + Wider (ha) | | 153.4 | 115.3 | 158.2 | 318.2 | 745.1 |
| Total: Core + Wider (ha) + Vacant | | 163 | 116.2 | 167.5 | 333.3 | 780 |
| GRAND TOTAL | | 198.3 | 127.6 | 184.6 | 344.7 | 855.2 |

London Industrial Land Demand Study (CAG Consultants, October 2017)

Projected change in industrial floorspace

Table 6.24 Projected change in industrial floorspace for SLWP boroughs 2016-41

| | Employment Projection Method | Trend Based |
|---------------|------------------------------|-------------------|
| Croydon | -61,700 | -123,600 |
| Kingston | -41,300 | 27,200 |
| Merton | -21,700 | -116,300 |
| Sutton | -31,100 | 98,700 |
| SLWP | -155,800 | -114,000 |
| LONDON | -1,151,400 | -1,048,100 |

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

Projected land demand for industrial and warehousing uses

Table 6.25: Forecast land demand for General & Light Industry for SLWP boroughs 2016-41 (ha)

| | Employment-Based | Trend-Based | Average |
|-------------|------------------|--------------|--------------|
| Croydon | -9.5 | -19.0 | -14.3 |
| Kingston | -6.4 | 4.2 | -1.1 |
| Merton | -3.3 | -17.9 | -10.6 |
| Sutton | -4.8 | 15.2 | 5.2 |
| SLWP | -24 | -17.5 | -20.8 |
| LONDON | -173.3 | -159.7 | -166.5 |

Source: Employment Projection Method Trend-Based (CAG Consultants 2019)

Table 6.26: Projected change in demand for warehouse floorspace and land for SLWP boroughs 2016-41

| | Floorspace | Land (ha) |
|-------------|---------------|-------------|
| Croydon | -27,300 | -4.2 |
| Kingston | -56,200 | -8.6 |
| Merton | 41,000 | 6.3 |
| Sutton | 110,800 | 17.0 |
| SLWP | 68,300 | 11.0 |
| LONDON | 1,608,400 | 279.6 |

Source: Employment Projection Method Trend-Based (CAG Consultants 2017)

Projected land demand for apportioned waste as of 2016 (based upon the previous London Plan)⁴¹

Table 6.27: Indicative net land requirement for apportioned waste for SLWP boroughs to 2036

| | Previous London Plan 2016 apportionment of HH and C&I waste to 2036 (tpa) | Land requirement (ha) | Indicative land take of planned capacity (ha) | Net Indicative Land Requirement (ha) |
|-------------|---|-----------------------|---|--------------------------------------|
| Croydon | 247,000 | 4.2 | 0.2 | 4.0 |
| Kingston | 148,000 | 2.5 | 0.0 | 2.5 |
| Merton | 239,000 | 4.1 | 2.5 | 1.5 |
| Sutton | 198,000 | 3.4 | 4.8 | -1.4 |
| SLWP | 832,000 | 14.2 | 7.5 | 6.6 |
| LONDON | 8,325,000 | 137.9 | 171.8 | -33.9 |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

Release of industrial land to other uses

Table 6.28: Industrial pipeline planned release to other uses for SLWP boroughs as of 2016 (ha)

| | Development pipeline (LDD) | Local Plan/ Opportunity Areas/ Site Allocations | Total |
|-------------|----------------------------|---|-------------|
| Croydon | 1.3 | 0 | 1.3 |
| Kingston | 0.6 | 0 | 0.6 |
| Merton | 0.7 | 0.1 | 0.8 |
| Sutton | 10.2 | 7.5 ⁴² | 17.7 |
| SLWP | 12.8 | 7.6 | 20.4 |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

⁴¹ as discussed in Section 3 of this report, the new London Plan 2019-41 has introduced revised borough apportionment targets for household and C&I waste streams, so the data in this table will be superseded

⁴² as of September 2019, this land (at the former Felnex industrial estate and the former Wandle Valley Trading Estate in Hackbridge) is now under construction for residential uses

Table 6.29: Projected industrial land release by borough 2016-41

| | Industrial | Warehousing | Waste | Other | Demand | Surplus from excess vacant land | Net release |
|-------------|--------------|-------------|------------|------------|----------|---------------------------------|-------------|
| Croydon | -14.3 | -4.2 | 4.0 | 8.0 | -6.5 | -3.5 | -9.9 |
| Kingston | -1.1 | -8.6 | 2.5 | - | -7.2 | 0.0 | -7.2 |
| Merton | -10.6 | 6.3 | 1.5 | - | -2.8 | -2.2 | -5.0 |
| Sutton | 5.2 | 17.0 | -1.4 | 1.7 | 22.5 | -8.0 ⁴³ | 14.5 |
| SLWP | -20.8 | 10.5 | 6.6 | 9.7 | 6 | -13.7 | -7.6 |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

Table 6.30: Comparison of London Plan 2016 Benchmark Demand and Pipeline Release of industrial land to other uses

| | Benchmark release (London Plan 2016) | Planned release | Planned – benchmark comparison |
|-------------|--------------------------------------|-----------------|--------------------------------|
| Croydon | -9.9 | -1.3 | 8.6 |
| Kingston | -7.2 | -0.6 | 6.7 |
| Merton | -5.0 | -0.8 | 4.2 |
| Sutton | 14.5 | -17.7 | -32.2 |
| SLWP | -7.6 | -20.4 | -12.7 |

Source: CAG, London Industrial Land Supply and Economy Study (GLA ,2016)

Borough classifications for the management of industrial floorspace capacity

Table 6.31: Management of industrial floorspace capacity – borough classifications (see also Table 6.2 of new London Plan) 2016-41⁴⁴

| | Vacancy Rate (%) | Rents | Baseline net release (ha) | Categorisation in new London Plan | Notes |
|----------|------------------|--------|---------------------------|---|---|
| Croydon | 5.9% | £10.25 | -9.9 | Retain | These boroughs should seek to intensify industrial floorspace capacity following the principle of no net loss across SILs and locally significant industrial areas |
| Kingston | 0.8% | £12.00 | -7.2 | Retain | |
| Merton | 5.6% | £10.50 | -5.0 | Retain | |
| Sutton | 4.5% | £11.75 | 14.5 | Provide Capacity (i.e. demand for industrial, logistics and related uses is anticipated to be the strongest) | LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations accessible to strategic road network and in other sustainable locations. Sutton's new Local Plan (February 2018) has identified 10 additional hectares of land for industrial uses to 2031. |

Source: Draft new London Plan 2017 and London Industrial Land Supply and Economy Study (CAG Consultants ,2016)

⁴³ Sutton's surplus excess vacant land is thought to be accounted for by the former Felnex industrial estate and the Wandle Valley Trading Estate, so there may be an element of double-counting between Tables 6.28 and 6.29

⁴⁴ in the Wandle Valley property market area there is an overall positive net demand, and this is strongest in Sutton and Wandsworth

Town Centre Network

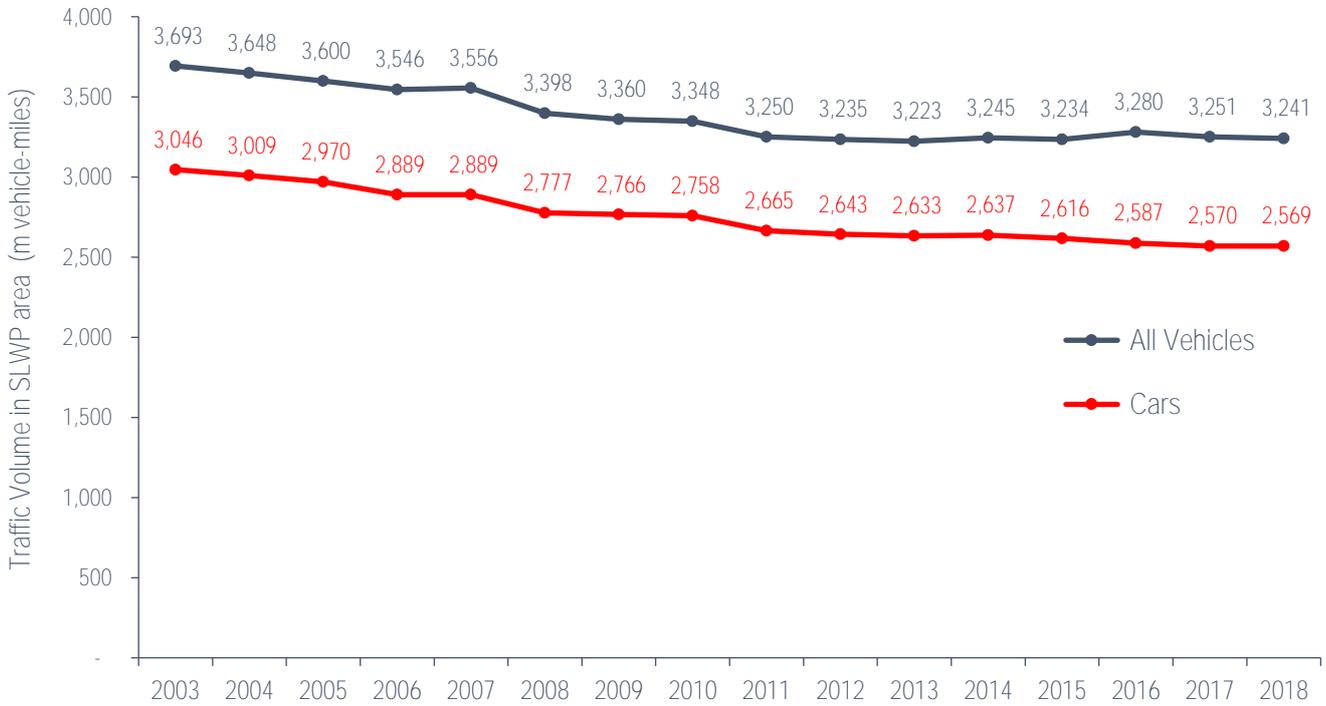
Table 6.32: Town centre network in SLWP area: retail floorspace and outlets

| Borough | Centre | Classification (LP2016) | Retail Floorspace | | | Retail Outlets | | |
|----------|-------------------------------|-------------------------|-------------------|--------------------|----------------|----------------|-------------|-----------|
| | | | Comparison (sq.m) | Convenience (sq.m) | Service (sq.m) | Comparison | Convenience | Service |
| Croydon | Croydon | Metropolitan | 157,155 | 13,850 | 9,800 | 239 | 59 | 87 |
| | Addiscombe | District | 3,200 | 2,660 | 2,080 | 25 | 13 | 23 |
| | Coulsdon | District | 4,030 | 1,790 | 3,130 | 32 | 10 | 28 |
| | New Addington | District | 2,350 | 2,500 | 930 | 11 | 10 | 9 |
| | Norbury | District | 3,080 | 4,870 | 3,440 | 24 | 25 | 32 |
| | Purley | District | 4,150 | 8,680 | 4,500 | 25 | 7 | 39 |
| | Selsdon | District | 1,400 | 6,240 | 1,120 | 13 | 6 | 16 |
| | South Norwood | District | 2,620 | 3,230 | 3,150 | 21 | 21 | 35 |
| | Thornton Heath | District | 5,030 | 11,170 | 2,790 | 31 | 28 | 37 |
| | Upper Norwood/ Crystal Palace | District | 6,650 | 5,330 | 2,400 | 49 | 17 | 24 |
| Kingston | Kingston | Metropolitan | 134,080 | 9,890 | 5,180 | 244 | 32 | 52 |
| | New Malden | District | 9,851 | 6,230 | 3,270 | 36 | 17 | 29 |
| | Surbiton | District | 8,256 | 7,320 | 4,330 | 45 | 14 | 36 |
| | Tolworth | District | 4,170 | 4,180 | 1,980 | 33 | 13 | 22 |
| Merton | Wimbledon | Major | 37,508 | 11,380 | 4,370 | 101 | 25 | 35 |
| | Mitcham | District | 4,967 | 7,940 | 2,440 | 28 | 23 | 26 |
| | Morden | District | 3,340 | 7,520 | 2,660 | 23 | 26 | 24 |
| | Colliers Wood | PotentialDistrict | 22,900 | 10,710 | 540 | 17 | 1 | 2 |
| Sutton | Sutton | Metropolitan | 70,593 | 20,140 | 5,490 | 121 | 24 | 50 |
| | Carshalton Village | District | 2,720 | 1,560 | 1,410 | 15 | 6 | 13 |
| | Cheam Village | District | 4,410 | 1,530 | 2,510 | 34 | 7 | 21 |
| | North Cheam | District | 3,150 | 9,980 | 1,330 | 24 | 7 | 18 |
| | Rosehill | District | 2,764 | 3,264 | 1,701 | 15 | 15 | 19 |
| | Wallington | District | 6,000 | 7,060 | 2,290 | 38 | 12 | 25 |
| | Worcester Park | District | 6,800 | 4,690 | 4,260 | 39 | 11 | 31 |
| | Hackbridge | PotentialDistrict | 547 | 1,223 | 477 | 1 | 1 | 1 |

ENVIRONMENT

Traffic growth and congestion

Figure 6.13: Traffic Volumes (million vehicle-km) in SLWP area 2003 to 2018



Source: Department for Transport (DfT) 2019

Table 6.33: Overall volume of vehicular traffic for SLWP boroughs and plan area 2008-2018

| | Volume of vehicular traffic (million vehicle-km) | | Change in volume of vehicular traffic from 2008 to 2018 | |
|-------------|--|--------------|---|--------------|
| | 2008 | 2018 | million vehicle-km | % change |
| Croydon | 1,212 | 1,156 | -56 | -4.6% |
| Kingston | 925 | 887 | -38 | -4.1% |
| Merton | 621 | 585 | -36 | -5.8% |
| Sutton | 640 | 613 | -27 | -4.2% |
| SLWP | 3,398 | 3,241 | -157 | -4.6% |
| London | 30,273 | 29,539 | -734 | -2.4% |

Table 6.34: Overall volume of car traffic for SLWP boroughs and plan area 2008-2018

| | Volume of car traffic (million vehicle-km) | | Change in volume of car traffic 2008-18 | |
|-------------|--|--------------|---|--------------|
| | 2008 | 2018 | million vehicle-km | % change |
| Croydon | 989 | 917 | -72 | -7.3% |
| Kingston | 766 | 713 | -53 | -6.9% |
| Merton | 497 | 452 | -45 | -9.1% |
| Sutton | 525 | 487 | -38 | -7.2% |
| SLWP | 2,777 | 2,569 | -208 | -7.5% |
| London | 23,878 | 22,573 | -1305 | -5.5% |

Source: Department for Transport (DfT) 2019

Modal share

Table 6.35: Trips per day by borough of origin, and modal shares (average day) 2016/17 to 2018/19 for SLWP boroughs and plan area

| | Croydon | Kingston | Merton | Sutton | SLWP | London |
|----------------------------|---------|----------|--------|--------|--------------|--------|
| Total trips per day (000s) | 832 | 387 | 435 | 452 | 2,096 | 18,047 |
| Rail | 10% | 10% | 9% | 8% | 9% | 6% |
| Underground | 1% | 1% | 8% | 3% | 3.2% | 10% |
| Bus/tram | 16% | 12% | 12% | 10% | 12.4% | 14% |
| Taxi/other | 1% | 1% | 1% | 1% | 0.9% | 2% |
| Car/MC | 48% | 42% | 42% | 51% | 45.8% | 35% |
| Cycle | 1% | 3% | 1% | 1% | 1.4% | 3% |
| Walk | 24% | 32% | 28% | 26% | 27.3% | 32% |

Source: Borough Local Implementation Plan (LIP) performance indicators, TfL

Road casualties

Table 6.36: Road casualties, people killed or seriously injured in road traffic collisions 2014-18*

| | Croydon | Kingston | Merton | Sutton | SLWP | London |
|-----------------------------------|---------|----------|--------|--------|------|--------|
| 2005-09 average | 252 | 103 | 117 | 124 | 596 | 6,402 |
| 2014 | 135 | 67 | 83 | 51 | 336 | 3,969 |
| 2015 | 121 | 49 | 68 | 40 | 278 | 3,775 |
| 2016 | 122 | 52 | 69 | 45 | 288 | 3,759 |
| 2017 | 126 | 50 | 60 | 61 | 297 | 3,883 |
| 2018 | 112 | 55 | 78 | 70 | 315 | 4,079 |
| 2017 to 2018 | -13% | +10% | +30% | +15% | +6% | +5% |
| 2018 compared to 2005-09 baseline | -56% | -47% | -33% | -44% | -47% | -36% |

Source: DfT Reported KSI (adjusted) Road Casualties GB Annual Report 2018

*Note on changes to the reporting of road traffic casualties:

The Metropolitan Police introduced a new collision reporting system in November 2016 which uses an 'injury-based assessment' in line with DfT guidance together with online self-reporting. While both of these changes are expected to provide a better assessment of injury occurrence and severity, this has made data collected from November 2016 onwards difficult to compare with earlier data.

TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017, and are used in this table

Road Network

Table 6.37: Road classifications in SLWP area

| | 'A' Roads including Strategic Red Routes (TfL road network) (km) | Minor Roads including other 'A' Roads, 'B' Roads, 'C' Roads and unclassified local access roads (km) | Total Road Length (km) |
|-------------|--|--|------------------------|
| Croydon | 78.1 km | 698.3 km | 776.4 km |
| Kingston | 44.7 km | 299.4 km | 344.1 km |
| Merton | 42.4 km | 336.9 km | 379.3 km |
| Sutton | 29.6 km | 402.3 km | 431.9 km |
| SLWP | 194.8 km | 1736.9 km | 1931.7 km |

Highway asset condition

Table 6.38: Highway asset condition – percentage of the principal road network length in poor condition and requires requires maintenance³⁵ for SLWP boroughs and plan area 2012-16

| | 2014-15 | 2015-16 | 2016-17 |
|-------------|---------|---------|---------|
| Croydon | 33.4% | 36.3% | 13.2% |
| Kingston | 19.0% | 17.8% | 18.2% |
| Merton | 15.4% | 15.9% | 8.8% |
| Sutton | 14.7% | 16.2% | 11.9% |
| SLWP | 20.6% | 21.6% | 13.0% |
| London | 16.0% | 15.3% | 12.6% |

Source: Borough Local Implementation Plan (LIP) performance indicators (TfL, Report 10)

Air Quality³⁶

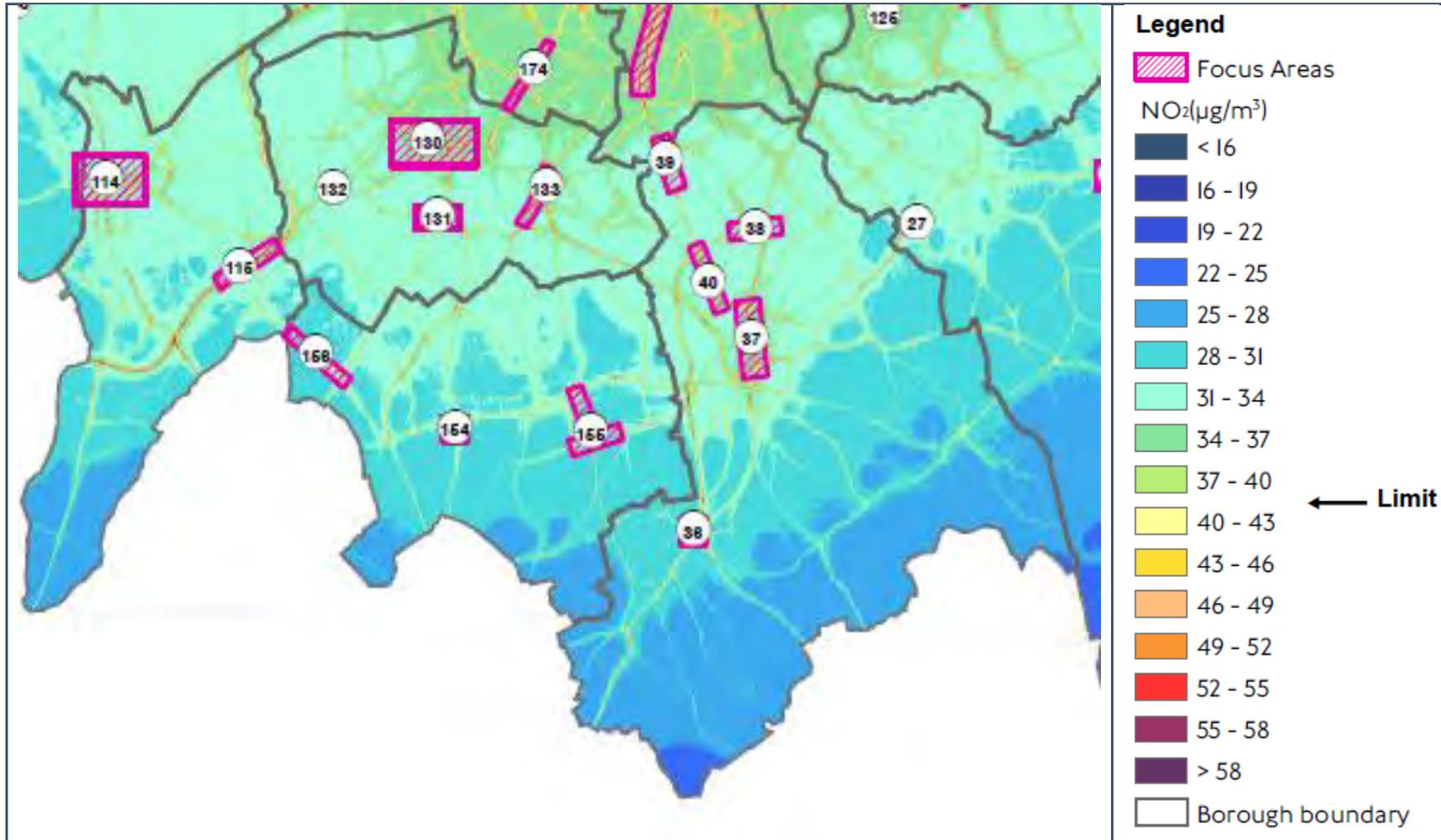
Table 6.39: Air Quality Focus Areas within the SLWP area

| | Air Quality Focus Area |
|----------|--|
| Croydon | Purley Cross and Russell Hill |
| | Wellesley Road |
| | Thornton Heath Brigstock Rd/High St/Whitehorse Lane |
| | Norbury London Road |
| | London Road between Thornton Heath Pond and St James Road |
| Kingston | Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road |
| | A3 Kingston Bypass at Malden Junction |
| Merton | Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road |
| | Morden Road/London Road/Morden Hall Road/Martin Way |
| | Raynes Park junctions Kingston Road/Bushey Road |
| | Mitcham London Road A216 from Cricket Green to Streatham Road Junction |
| Sutton | Sutton A232 Cheam/Carshalton Rd/High St/Brighton Rd |
| | Wallington Manor Rd/Stanley Park Rd/Stafford Rd |
| | Central Road/ Cheam Common Road |

³⁵ based on Detailed Visual Inspection survey data

³⁶ Air Quality Focus Areas are locations that not only exceed the EU annual mean limit value for NO2 but are also locations with high human exposure. They were defined to address concerns raised by boroughs within the LAQM review process and forecasted air pollution trends

Figure: 6.14: Air Quality Focus Areas within the SLWP area



Source: London Atmospheric Emissions Inventory 2016

Table 6.40: Air quality monitoring results for Croydon in 2018³⁷

| National air quality objective | Norbury | | Norbury Manor | | Park Lane | | Purley Way (A23) | |
|--|---------|------|---------------|------|-----------|------|------------------|------|
| | 2018 | Met? | 2018 | Met? | 2018 | Met? | 2018 | Met? |
| NITROGEN DIOXIDE (NO₂) | | | | | | | | |
| 200 ug/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year | 0 | YES | - | - | 0 | YES | 0 | YES |
| 40 ug/m ³ as an annual mean | 49 | NO | - | - | 41 | NO | 31 | YES |
| PARTICULATE (PM10) | | | | | | | | |
| 40 ug/m ³ as an annual mean | - | - | - | - | 21 | YES | - | - |
| 50 ug/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year | - | - | - | - | 1 | YES | - | - |
| PARTICULATE (PM2.5) | | | | | | | | |
| 25 ug/m ³ as an annual mean | - | - | 12 | YES | - | - | - | - |

Source: London Air Quality Network (September 2019)

Table 6.41: Air quality monitoring results for Kingston in 2018

| National air quality objective | Cromwell Road | | Kingston Vale | | Tolworth Broadway | |
|--|---------------|------|---------------|------|-------------------|------|
| | 2018 | Met? | 2018 | Met? | 2018 | Met? |
| NITROGEN DIOXIDE (NO₂) | | | | | | |
| 200 ug/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year | 1 | YES | 0 | YES | 0 | YES |
| 40 ug/m ³ as an annual mean | 55 | NO | 36 | YES | 44 | NO |
| PARTICULATE (PM10) | | | | | | |
| 40 ug/m ³ as an annual mean | 30 | YES | 22 | YES | 23 | YES |
| 50 ug/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year | 15 | YES | 2 | YES | 2 | YES |
| PARTICULATE (PM2.5) | | | | | | |
| 25 ug/m ³ as an annual mean | - | - | - | - | - | - |

Source: London Air Quality Network (September 2019)

³⁷ calendar year from 1 January 2018 to 31 December 2018

Table 6.42: Air quality monitoring results for Merton in 2018

| National air quality objective | Merton Road | | Morden Civic Centre (2) | |
|--|-------------|------|-------------------------|------|
| | 2018 | Met? | 2018 | Met? |
| NITROGEN DIOXIDE (NO₂) | | | | |
| 200 ug/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year | - | - | 0 | YES |
| 40 ug/m ³ as an annual mean | - | - | 48 | NO |
| PARTICULATE (PM10) | | | | |
| 40 ug/m ³ as an annual mean | 32 | YES | - | - |
| 50 ug/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year | 13 | YES | - | - |
| PARTICULATE (PM2.5) | | | | |
| 25 ug/m ³ as an annual mean | | | | |

Source: London Air Quality Network (September 2019)

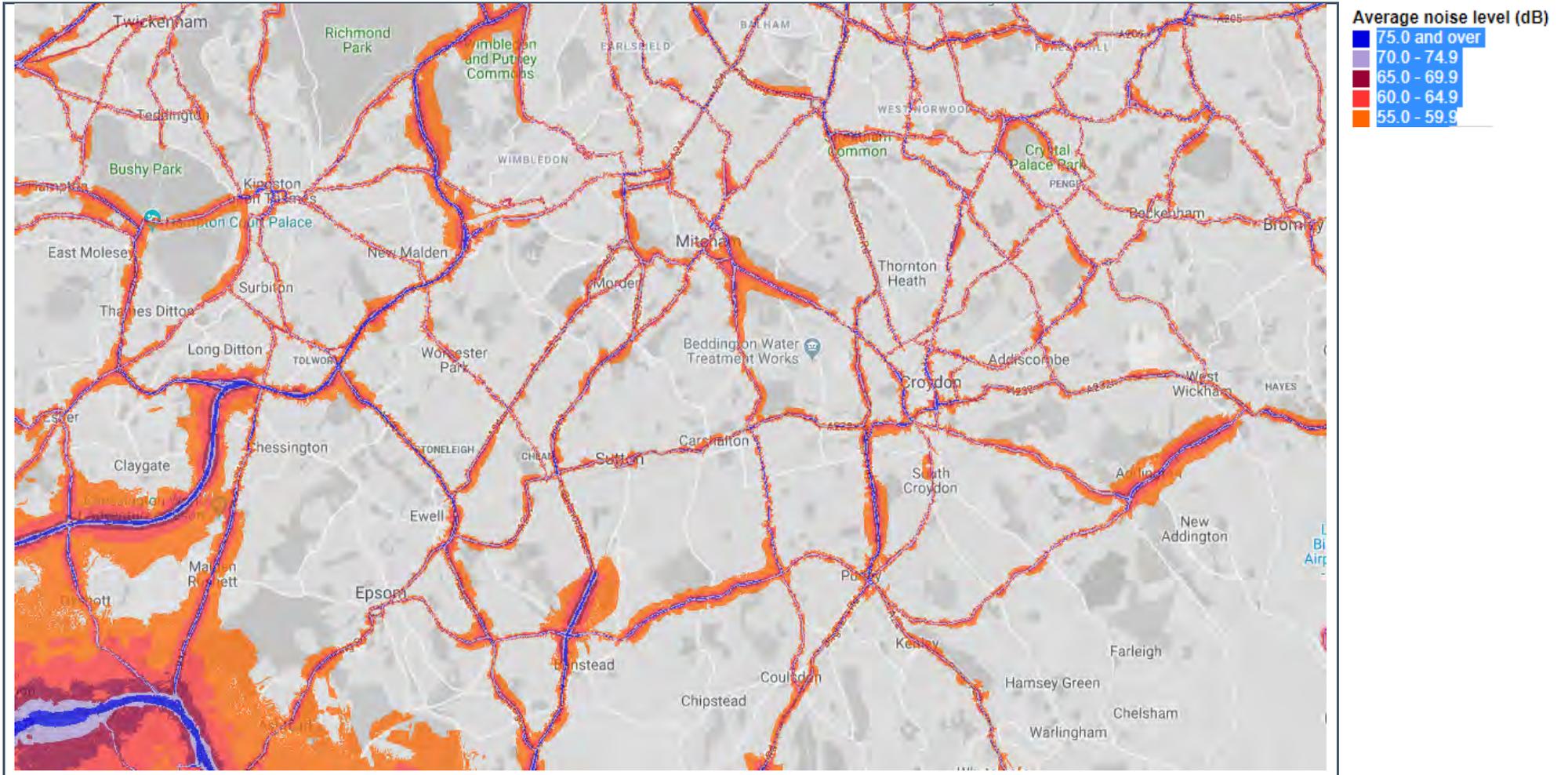
Table 6.43: Air quality monitoring results for Sutton in 2018

| National air quality objective | Beddington Lane | | Beddington Lane North | | Wallington | | Worcester Park | |
|--|-----------------|------|-----------------------|------|------------|------|----------------|------|
| | 2018 | Met? | 2018 | Met? | 2018 | Met? | 2018 | Met? |
| NITROGEN DIOXIDE (NO₂) | | | | | | | | |
| 200 ug/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year | 0 | YES | 0 | YES | 0 | YES | 7 | YES |
| 40 ug/m ³ as an annual mean | 25 | YES | 29 | YES | 47 | NO | 52 | NO |
| PARTICULATE (PM10) | | | | | | | | |
| 40 ug/m ³ as an annual mean | 22 | YES | 22 | YES | 23 | YES | 20 | YES |
| 50 ug/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year | 7 | YES | 2 | YES | 4 | YES | 2 | YES |
| PARTICULATE (PM2.5) | | | | | | | | |
| 25 ug/m ³ as an annual mean | - | - | 12 | YES | - | - | - | - |

Source: London Air Quality Network (September 2019)

Noise exposure

Figure 6.15: Road traffic noise exposure in the SLWP area (Lden)³⁸



Source: DEFRA Strategic Noise Mapping 2017

³⁸ Lden (day-evening-night) = a 24 hour annual average noise level in decibels with weightings applied for evening and night periods

Carbon Dioxide (CO₂) Emissions

Figure 6.16: CO₂ emissions within the SLWP area - TOTAL

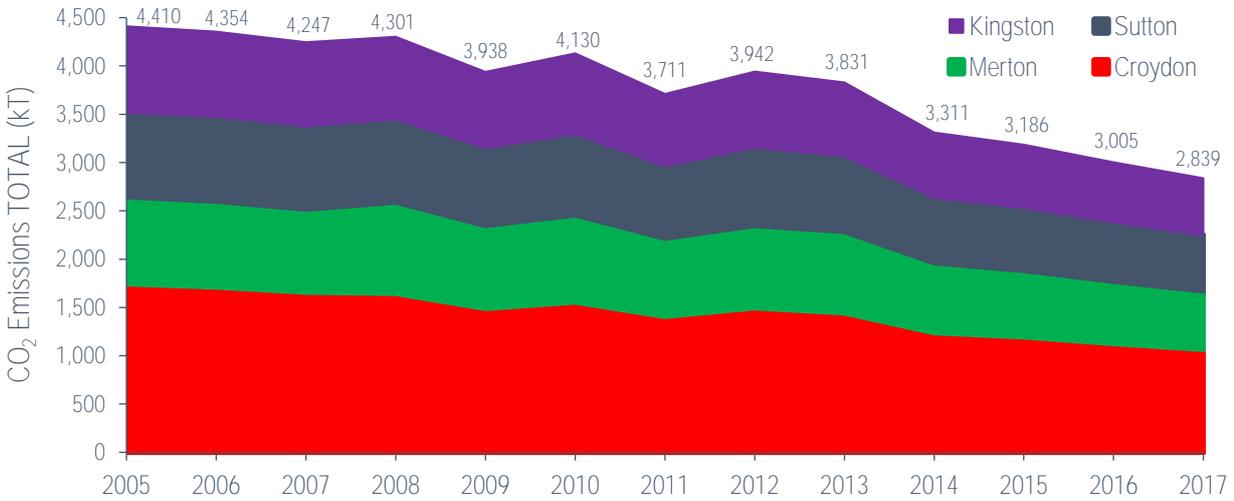


Figure 6.17: CO₂ emissions within the SLWP area - TRANSPORT

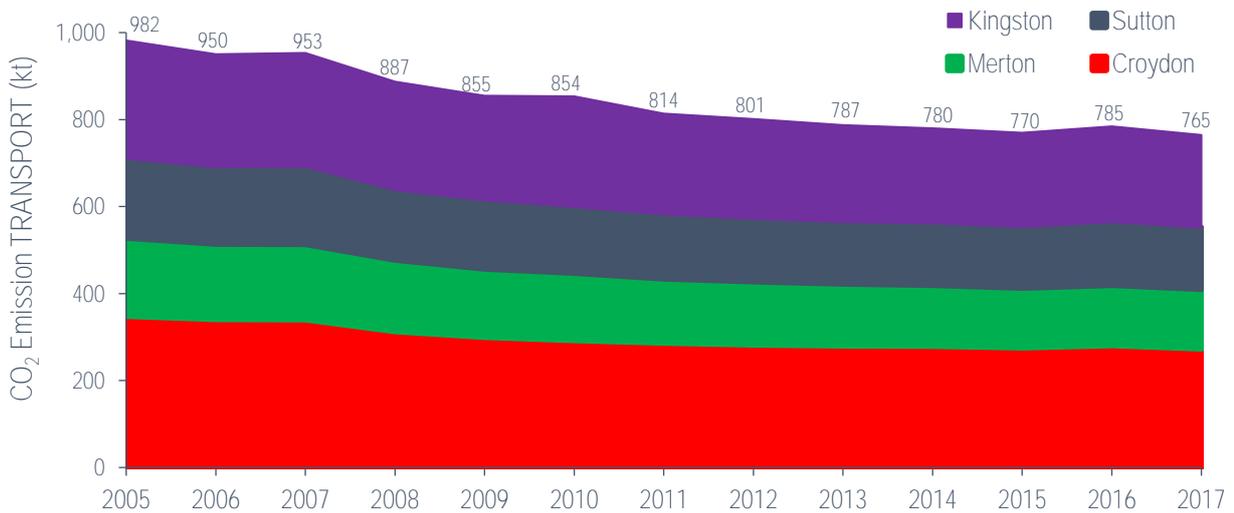
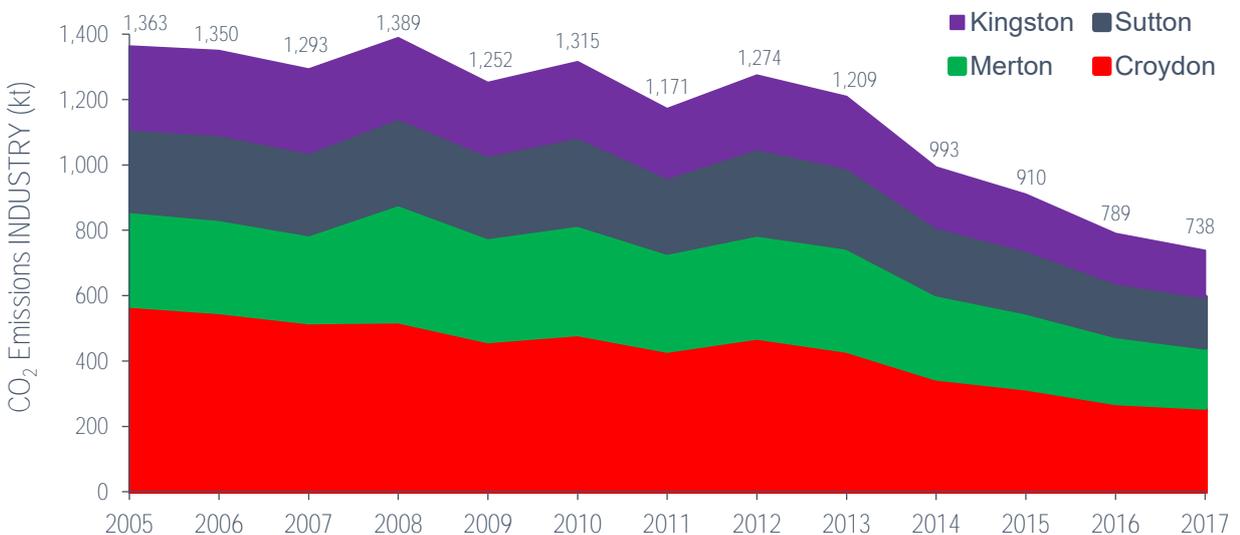


Figure 6.18: CO₂ emissions within the SLWP area - INDUSTRY AND COMMERCE



Source: UK local authority carbon dioxide emissions national statistics for 2005-16 (BEIS, June 2019)

Figure 6.19: Per capita CO₂ emissions within for SLWP boroughs 2005-2017 - total



Climate Change

Table 6.44: UK climate trends

| 4th Annual State of the UK Climate Report (July 2018) ³⁹ | |
|--|--|
| <ul style="list-style-type: none"> 2017 was the 5th warmest year in records dating back to 1910. Average UK temperatures over the last decade (2008-2017) were 0.8°C warmer than the 1961-1990 average. In contrast to summer 2018, UK summers have been notably wetter over the last decade (2008-2017), with a 20% increase in rainfall compared to 1961-1990. Nine of the ten warmest years in the UK have occurred since 2002, and all of the top ten since 1990. The Central England Temperature series, which extends back to 1659, shows that the 21st century has so far been warmer than the previous three centuries.; Although 2017 was not perceived to be a particularly warm year, it was still more than 1°C warmer than the 1961-1990 baseline and ranks fifth warmest year overall for the UK. Mean sea level around the UK has risen at a rate of approximately 1.4 mm per year since the start of the 20th Century. equivalent to a rise of about 16 cm. | |

Source: 4th Annual State of the UK Climate Report (Met Office, July 2018)

Table 6.45: Future Climate Projections

| Change in Climate | UKCP09 Emissions ⁴⁰ Scenarios in the 2050s | | |
|--|---|--------|----------------|
| | Low Emissions | Medium | High Emissions |
| TEMPERATURE | | | |
| Increase in winter mean temperature | +2°C | +2.2°C | +2.5°C |
| Increase in summer mean temperature | +2.5°C | +2.7°C | +3.1°C |
| Increase in summer mean daily maximum temp. | +3.5°C | +3.7°C | +4.3°C |
| Increase in summer mean daily min temp. | +2.7°C | 2.9°C | +3.3°C |
| RAINFALL | | | |
| Change in annual mean precipitation | 0% | 0% | 0% |
| Change in winter mean precipitation | +12% | +14% | +16% |
| Change in summer mean precipitation | - 14% | - 19% | -19% |

Source: UK Climate Impacts Programme Projections (UKCP09)

³⁹ the Met Office's Annual State of the UK Climate Report provides an up-to-date assessment of UK climate trends, variations and extremes based on the latest available climate quality observational datasets – see <https://www.metoffice.gov.uk/research/climate/maps-and-data/about/state-of-climate>

⁴⁰ the relevant UKCP18 projections are not yet available at the local level so the corresponding UKCP09 projections are quoted here

UK Climate Projections 2018 (UKCP18)

According to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC, 2014), atmospheric carbon dioxide (CO₂) levels in 2011 reached their highest point for almost 1 million years, rising to a new level of over 391 parts per million (ppm) compared to around 280 ppm prior to the industrial revolution. In the northern hemisphere, 1983 -2012 was the warmest 30-year period of the last 1400 years and 13 of the 15 hottest years on record globally have all occurred since 2000.

By April 2018 average CO₂ levels had risen to a new high of 410 ppm. According to a Special Report⁴¹ produced by the IPCC in November 2018, this has contributed to around a 1.0°C increase in average global temperatures since pre-industrial times. The IPCC Special Report concluded that international efforts should stepped up to limit warming to 1.5°C rather than the aspirational 2 °C target set by the Paris Agreement in order to avoid catastrophic impacts on human health, ecosystems, critical infrastructure, water supply and economic growth. However, this can only be achieved if global CO₂ emissions start to fall well before 2030 through rapid and far-reaching transitions in energy supply, land-use, industry and transport.

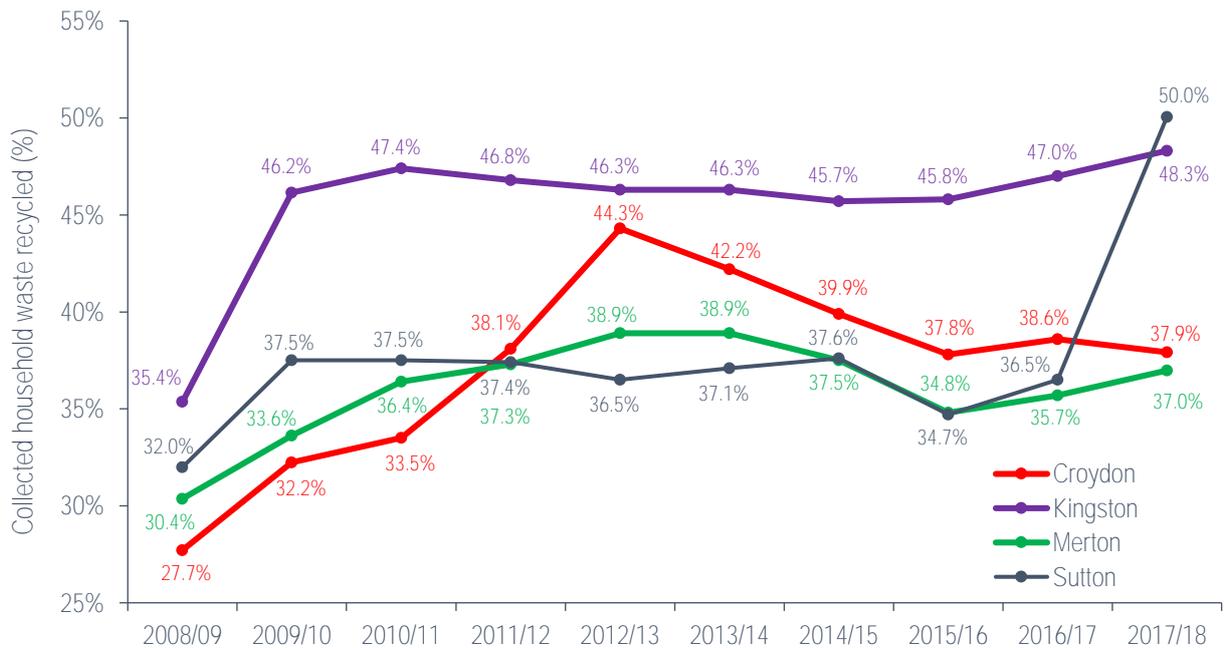
The latest UK Climate Projections 2018 (UKCP18)⁴², published by the Met Office in November 2018, show that:

- by 2070, in the high emission scenario⁴³, average warming across the UK is projected to range from 0.9 °C to 5.4 °C in summer, and from 0.7 °C to 4.2 °C in winter.
- hot summers are expected to become more common. In the recent past (1981-2000) the chance of seeing a summer as hot as 2018 was low (<10%). The chance has already increased due to climate change and is now between 10-20%. With future warming, hot summers by mid-century will be even more common (~50%).
- human-induced climate change has made the 2018 record-breaking UK summer temperatures about 30 times more likely than it would be naturally.
- by 2070, in the high emission scenario, average changes in rainfall patterns across the UK are projected to range from -47% to +2% in summer, and between -1% to +35% in winter.
- by the end of the century, sea levels are projected to rise between 0.53m & 1.15m (high emission scenario).

UK Climate Projections 2018 (UKCP18)⁴⁴, published by the Met Office in November 2018

Household waste recycling rate

Figure 6.20: Household waste recycling rate for SLWP boroughs 2008-09 to 2017-18



⁴¹ the IPCC Special Report is available at https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_High_Res.pdf

⁴² UKCP18 headline findings at <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

⁴³ UKCP18 projections provide local low, central and high changes across the UK, corresponding to 10%, 50% and 90% probability levels. Local values are averaged over the UK to give a range of average precipitation change between the 10%- 90% probability levels

⁴⁴ UKCP18 headline findings at <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

Flood Risk

CROYDON

Figure 6.21: Fluvial flood risk in Croydon - Environment Agency Flood Zones

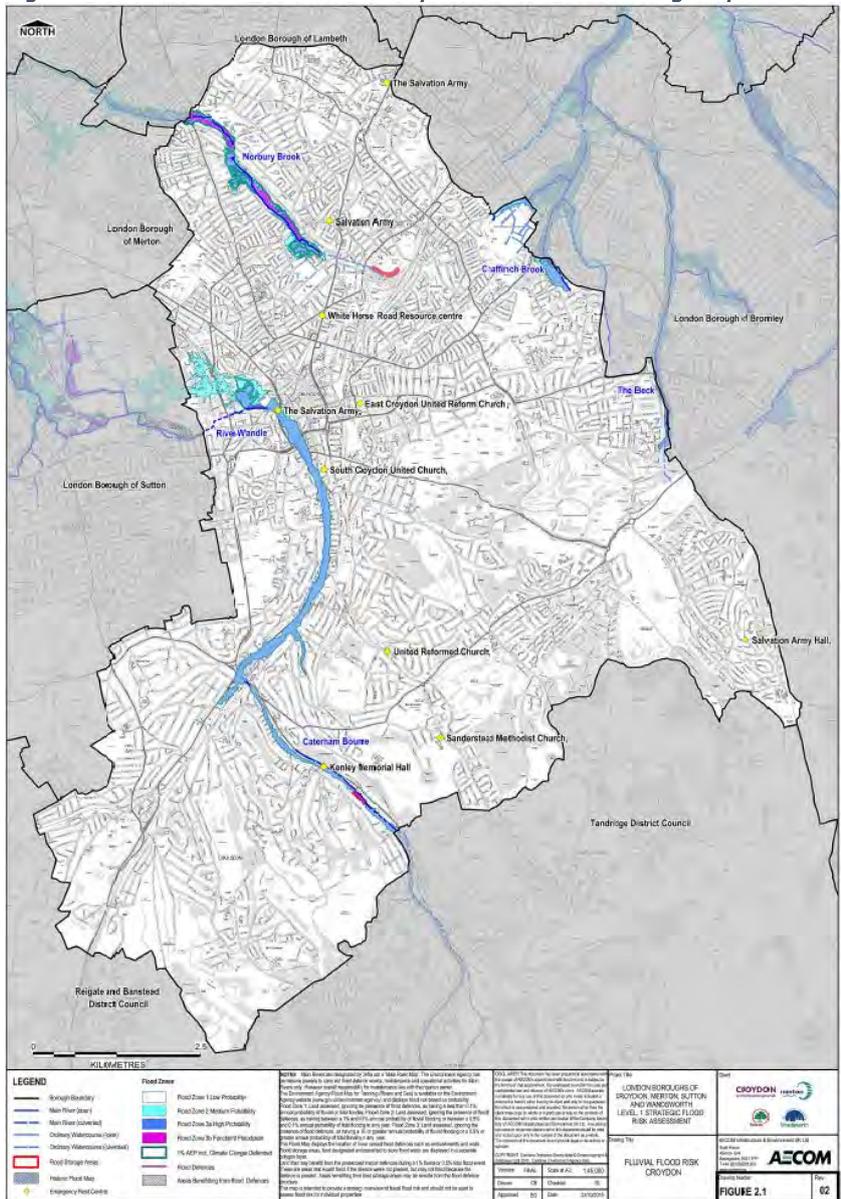


Table 6.46: Fluvial flood risk in Croydon – Properties located within EA Flood Zones

| EA Flood Zone | Flood Risk | % of Borough | Dwellings | Non-Residential | Unclassified |
|-------------------------------------|--|--------------|-----------|-----------------|--------------|
| Flood Zone 1 Low Risk | Less than 1 in a 1000 annual probability (<0.1%) | 97.8% | 144,140 | 6,149 | 8,649 |
| Flood Zone 2 Medium Risk | Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%) | 1.7% | 1,030 | 113 | 107 |
| Flood Zone 3a High Risk | More than 1 in a 100 annual probability (>1%) | <0.5% | 3,913 | 380 | 326 |
| Flood Zone 3b Functional Floodplain | More than 1 in 20 annual probability (>5% 'defended'). | <0.5% | 235 | 48 | 15 |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.22: Surface water flood risk in Croydon based on the Government’s Risk of Flooding from Surface Water (RoFSW) map

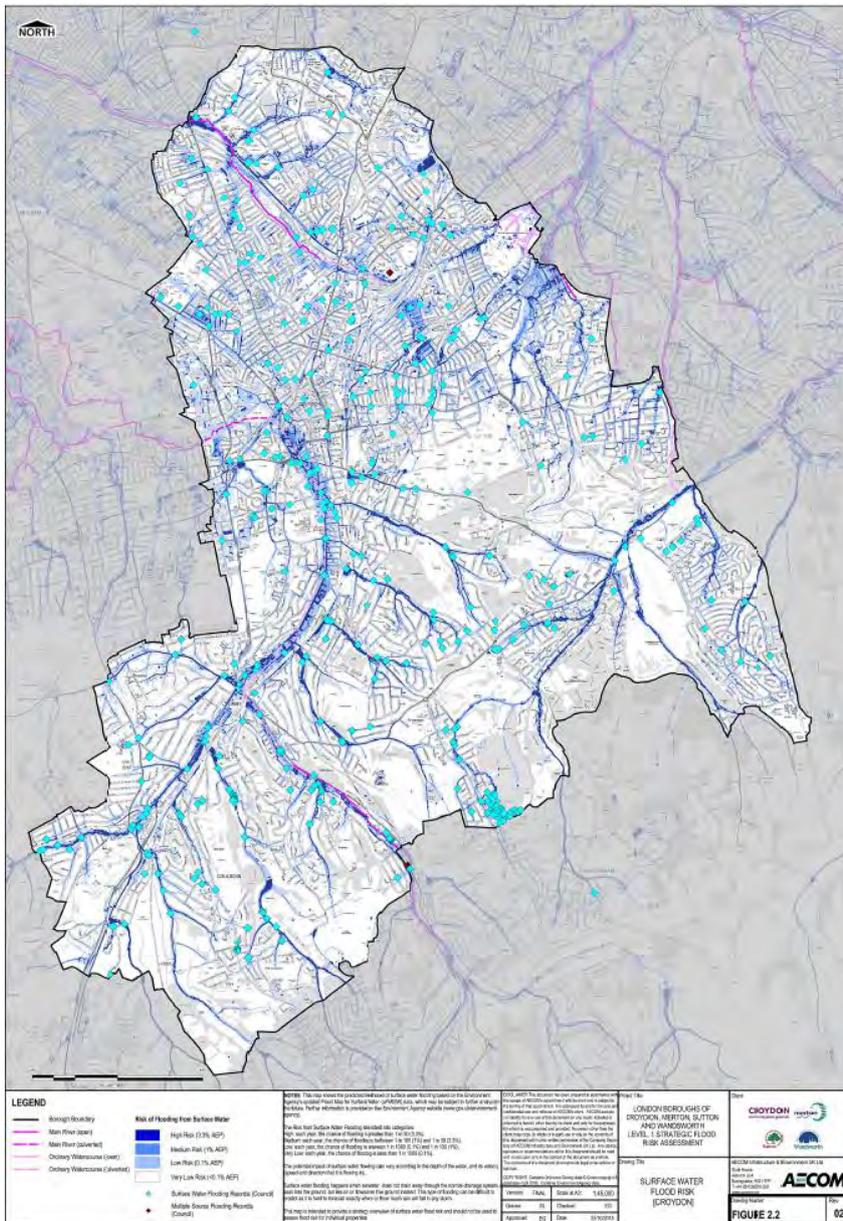


Table 6.47 Surface Water Flooding in Croydon: Dwellings at Risk in the 1 in 100 year event

| RoFSW ⁴⁵ Category | Surface Water Flood Risk | Dwellings | Non-Residential | Unclassified |
|------------------------------|---|-----------|-----------------|--------------|
| Low | Less than 1 in 100 annual probability (<1%) | 32,090 | 1,434 | 1,722 |
| Medium | Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%) | 10,094 | 871 | 638 |
| High | More than 1 in a 30 annual probability (>3.3%) | 5,856 | 737 | 513 |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

⁴⁵ based on the Government’s Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface Water (uFMfSW))

KINGSTON

Figure 6.23: Fluvial flood risk in Kingston - Environment Agency Flood Zones

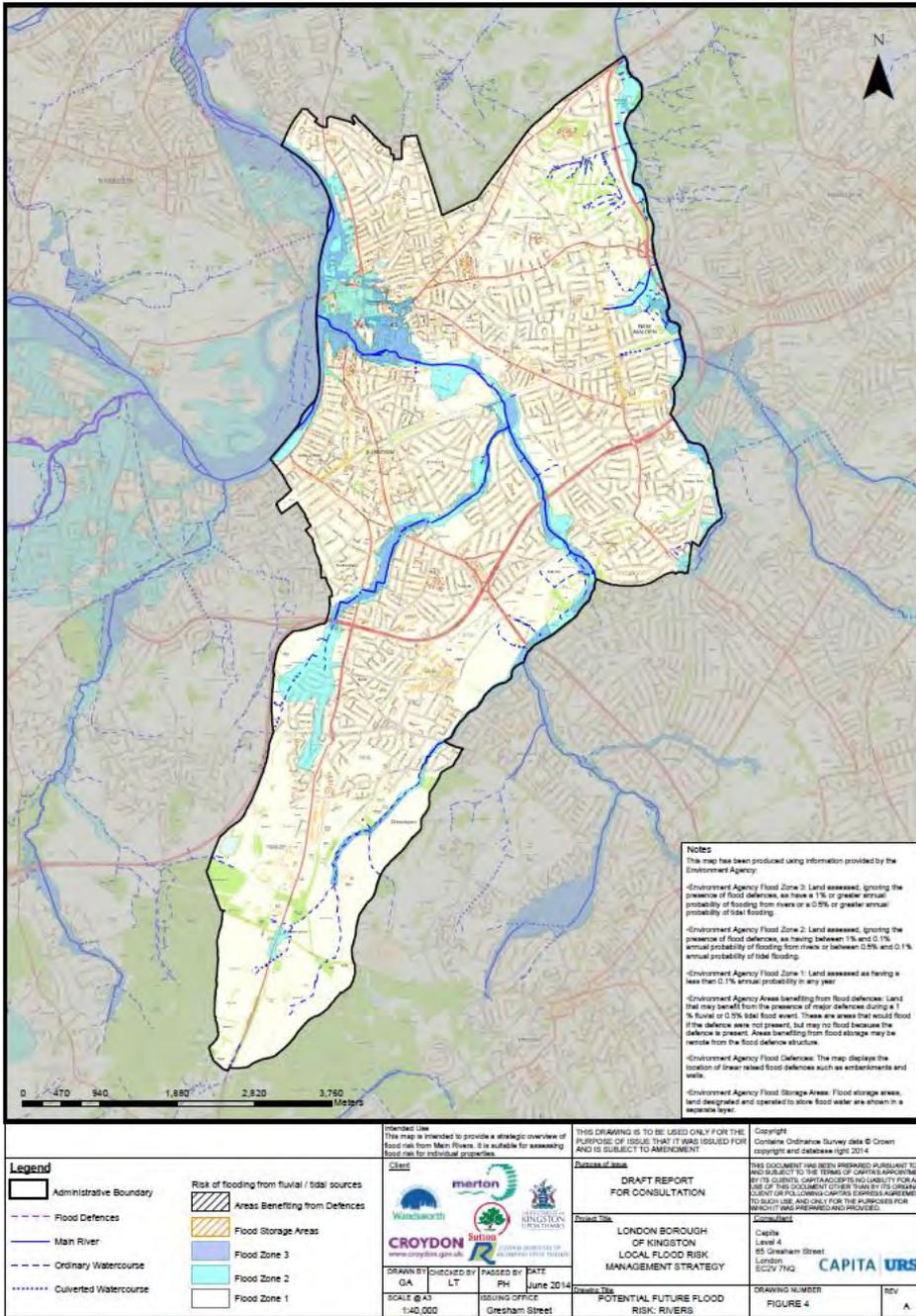


Table 6.49: Fluvial flood risk in Kingston - Properties located within EA Flood Zones

| EA Flood Zone | Flood Risk | Dwellings | Non-Residential | Unclassified |
|------------------------------|--|---------------------------|---------------------------|---------------------------|
| Flood Zone 1 Low Risk | Less than 1 in a 1000 annual probability (<0.1%) | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| Flood Zone 2 Medium Risk | Between 1 in a 100 and 1 in a 1000 annual prob (1% - 0.1%) | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| Flood Zone 3a High Risk | More than 1 in a 100 annual probability (>1%) | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |
| Flood Zone 3b FuncFloodplain | More than 1 in 20 annual probability (>5% 'defended'). | <i>data not available</i> | <i>data not available</i> | <i>data not available</i> |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.24: Surface water flood risk in Kingston based on the Government’s Risk of Flooding from Surface Water (RoFSW) map

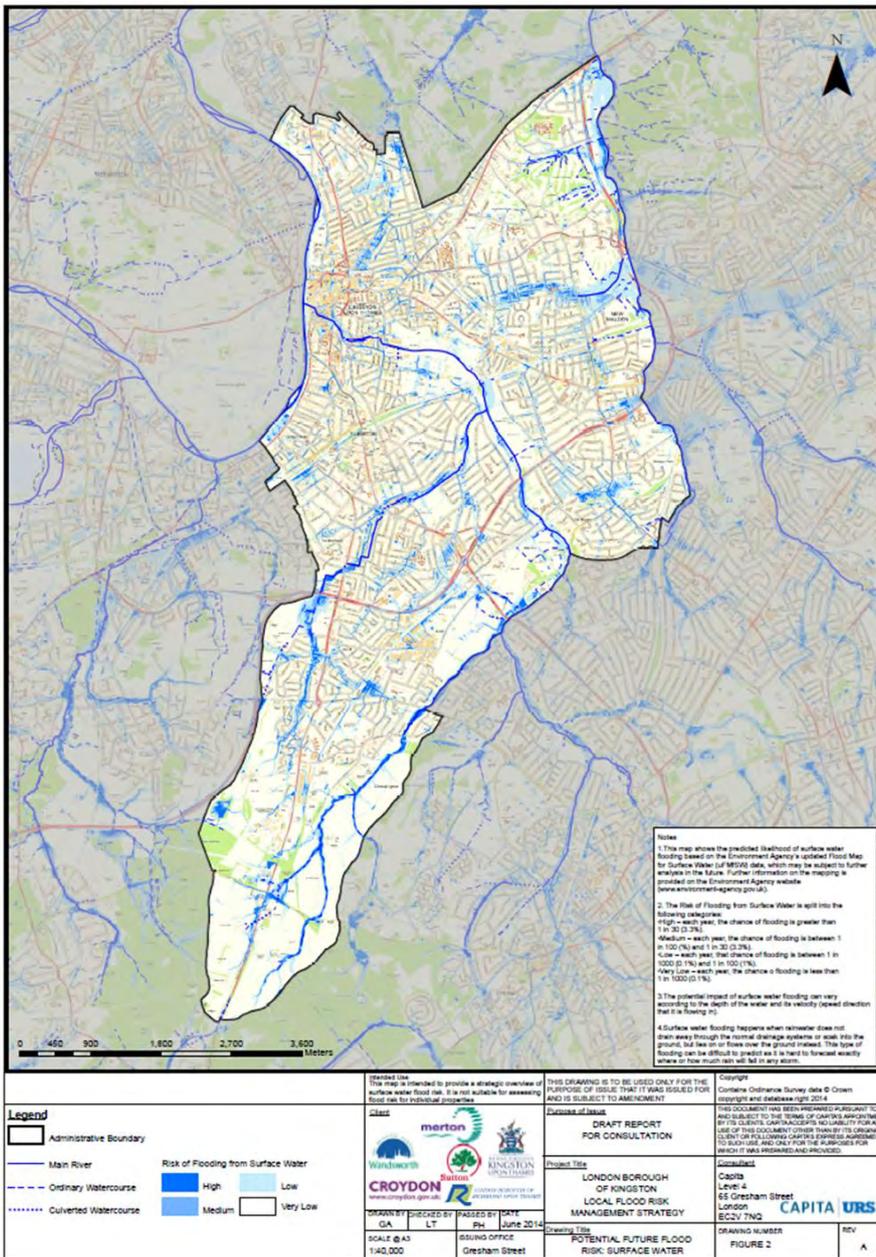


Table 6.50: Surface Water Flooding in Kingston: Dwellings at Risk in the 1 in 100 year event

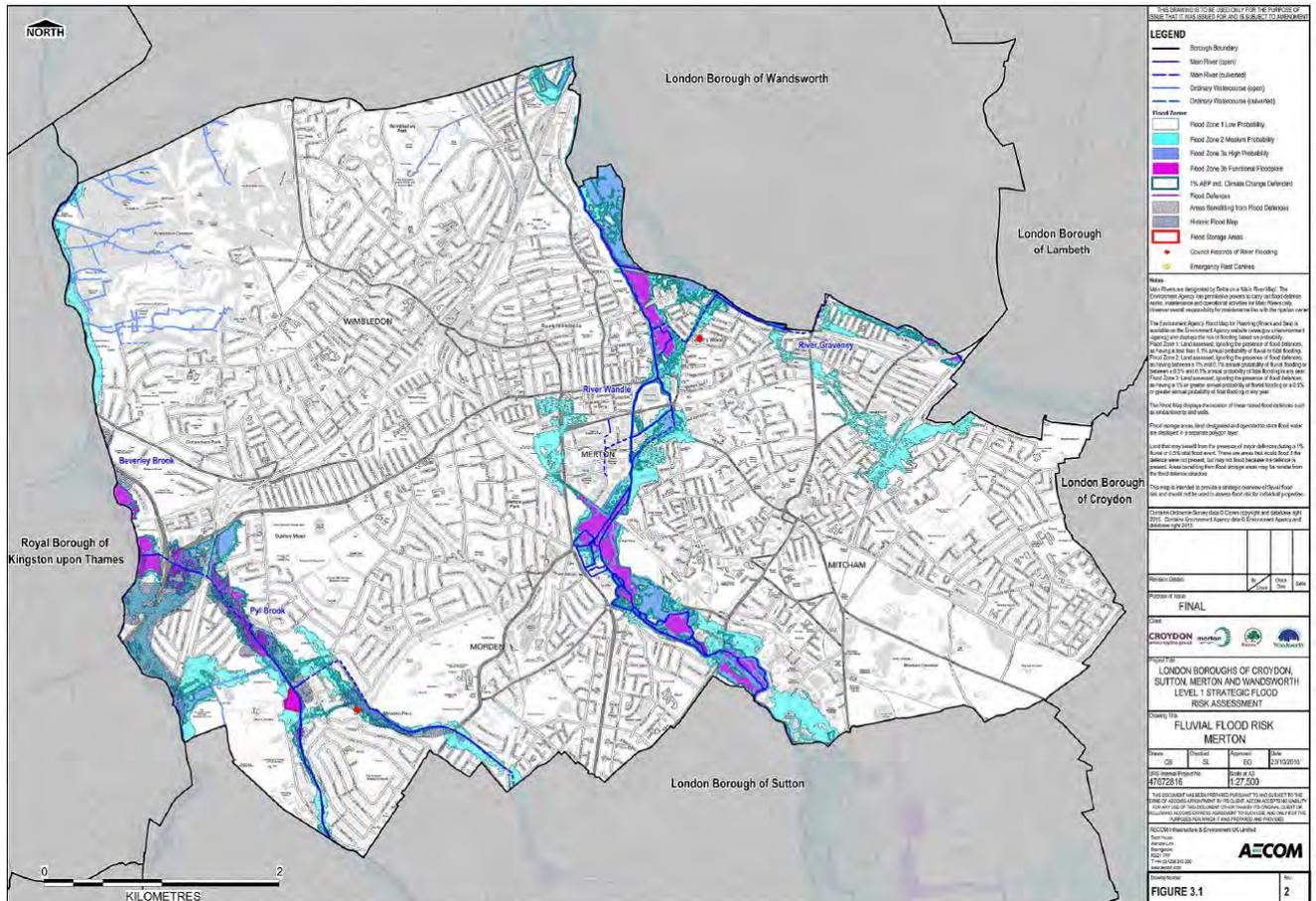
| RoFSW Category ⁴⁶ | Surface Water Flood Risk | Dwellings | Non-Residential | Unclassified |
|------------------------------|---|--------------------|--------------------|--------------------|
| Low | Less than 1 in 100 annual probability (<1%) | data not available | data not available | data not available |
| Medium | Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%) | data not available | data not available | data not available |
| High | More than 1 in a 30 annual probability (>3.3%) | data not available | data not available | data not available |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

⁴⁶ based on the Government’s Risk of Flooding from Surface Water (RoFSW) map (formerly referred to as the updated Flood Map for Surface water (uFMfSW))

MERTON

Figure 6.25: Fluvial flood risk in Merton- Environment Agency Flood Zones



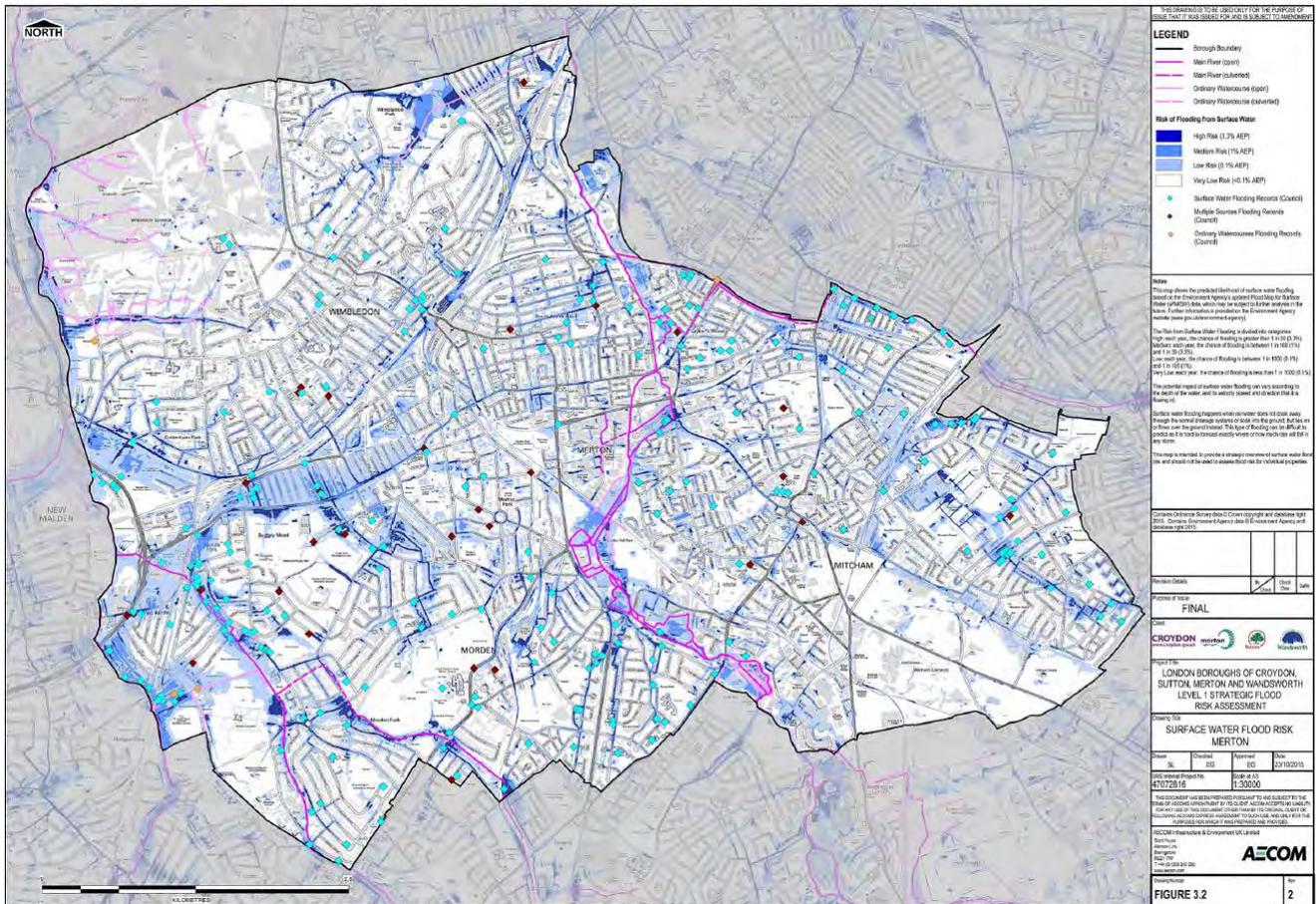
Source: SFRA Level 1 Report (AECOM, December 2015)

Table 6.51: Fluvial flood risk in Merton – Properties located within EA Flood Zones

| EA Flood Zone | Flood Risk | Land Area of the Borough | Dwellings | Non-Residential | Unclassified |
|-------------------------------------|--|--------------------------|-----------|-----------------|--------------|
| Flood Zone 1 Low Risk | Less than 1 in a 1000 annual probability of flooding (<0.1%) | 91.0% | 78,864 | 3,698 | 6,496 |
| Flood Zone 2 Medium Risk | Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%) | 5.2% | 5,106 | 316 | 489 |
| Flood Zone 3a High Risk | More than 1 in a 100 annual probability of flooding (>1%) | 1.9% | 1,272 | 101 | 136 |
| Flood Zone 3b Functional Floodplain | More than 1 in 20 annual probability of flooding (>5% 'defended'). | 1.7% | 254 | 20 | 61 |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.26: Surface water flood risk in Merton based on the Government’s Risk of Flooding from Surface Water (RoFSW) map



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

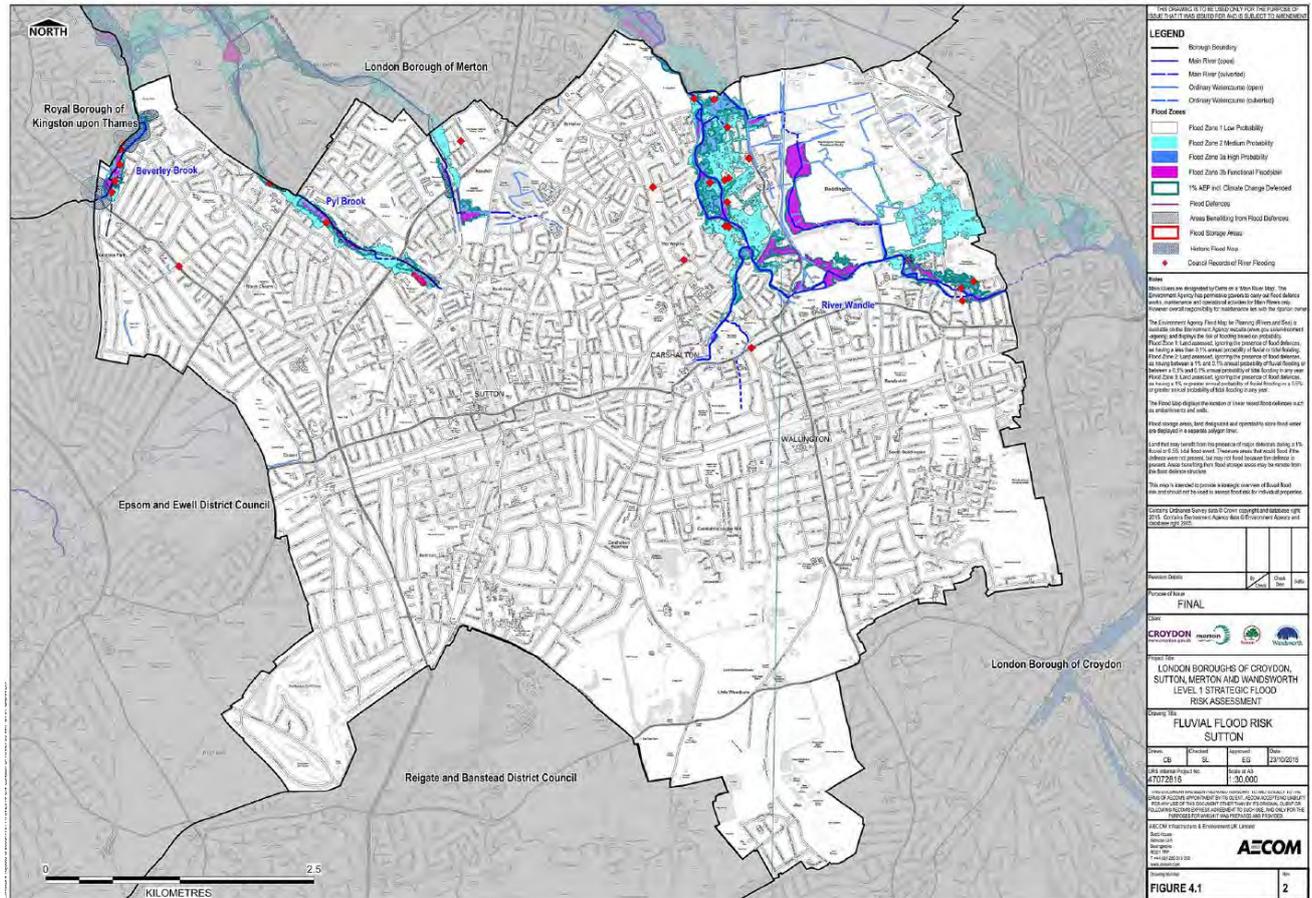
Table 6.47: Surface Water Flooding: Dwellings at Risk in Merton in the 1 in 100 year event

| RoFSW Category | Surface Water Flood Risk | Dwellings | Non-Residential | Unclassified |
|----------------|---|-----------|-----------------|--------------|
| Low | Less than 1 in 100 annual probability of flooding (<1%) | 19,730 | 1,147 | 1,936 |
| Medium | Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%) | 4,361 | 439 | 190 |
| High | More than 1 in a 30 annual probability of flooding (>3.3%) | 1,668 | 176 | 247 |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

SUTTON

Figure 6.27: Fluvial flood risk in Sutton - Environment Agency Flood Zones



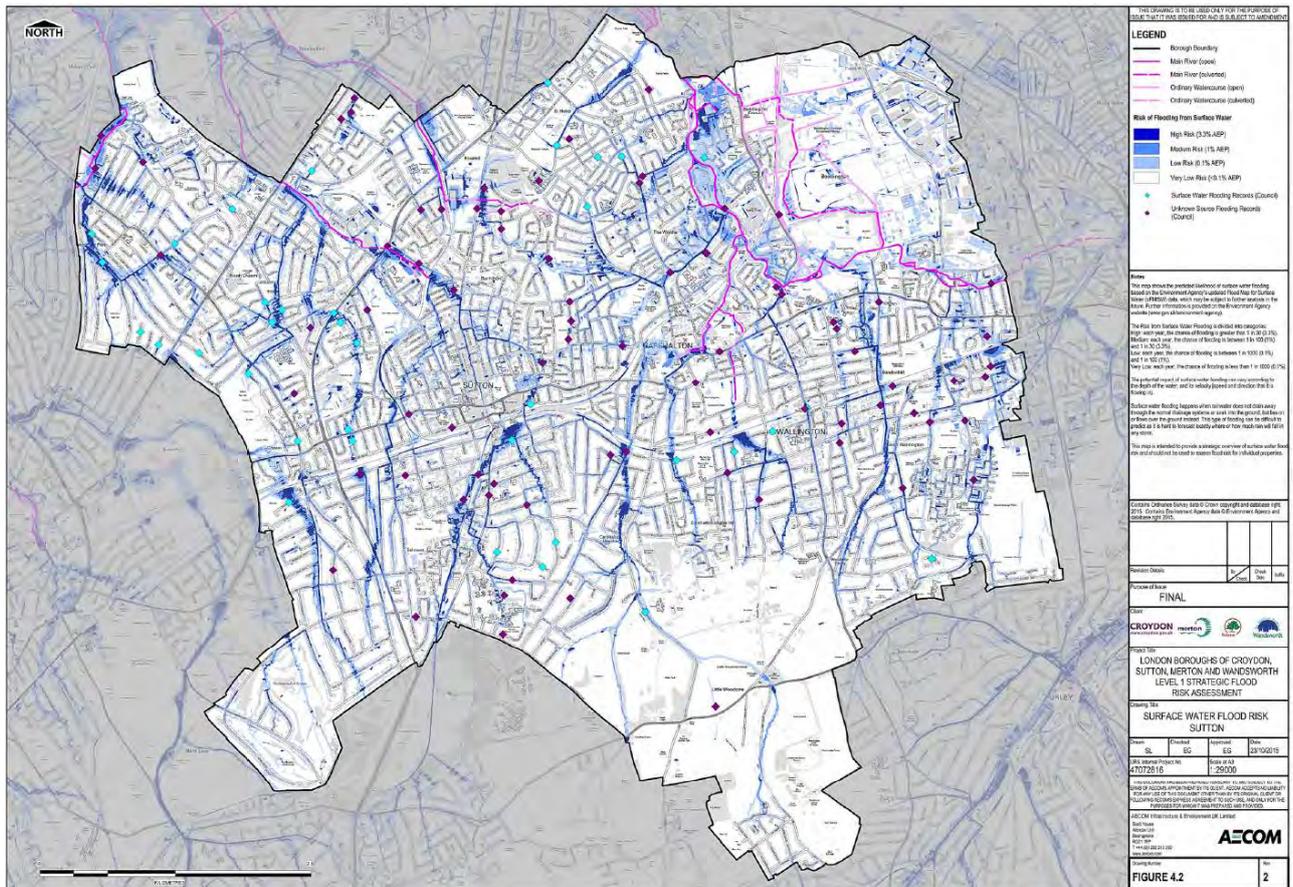
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.52: Fluvial flood risk in Sutton – Properties located within EA Flood Zones

| EA Flood Zone | Flood Risk | Land Area of the Borough | Dwellings | Non-Residential | Unclassified |
|--|--|--------------------------|-----------|-----------------|--------------|
| Flood Zone 1 Low Risk | Less than 1 in a 1000 annual probability of flooding (<0.1%) | 96.3% | 76,352 | 3,236 | 5,699 |
| Flood Zone 2 Medium Risk | Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%) | 2.4% | 1,889 | 167 | 181 |
| Flood Zone 3a High Risk | More than 1 in a 100 annual probability of flooding (>1%) | 1.0% | 822 | 20 | 43 |
| Flood Zone 3b Functional Floodplain | More than 1 in 20 annual probability of flooding (>5% 'defended'). | 0.2% | 198 | 11 | 20 |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Figure 6.28: Surface water flood risk in Sutton based on the Government’s Risk of Flooding from Surface Water (RoFSW) map



Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Table 6.53: Surface Water Flooding in Sutton: Dwellings at Risk in the 1 in 100 year event

| RoFSW Category | Surface Water Flood Risk | Dwellings | Non-Residential | Unclassified |
|----------------|---|-----------|-----------------|--------------|
| Low | Less than 1 in 100 annual probability of flooding (<1%) | 15,429 | 870 | 1,078 |
| Medium | Between 1 in 30 and 1 in a 100 annual probability of flooding (3.3% - 1%) | 4,287 | 325 | 303 |
| High | More than 1 in a 30 annual probability of flooding (>3.3%) | 2,860 | 267 | 219 |

Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report (AECOM, December 2015)

Sites of Importance for Nature Conservation (SINCs)

Table 6.54: Sites of importance for nature conservation (SINCs)

| | Number of SINCs | SINC Area (ha) | | | SINC as percentage of borough |
|----------|-----------------|--------------------------------------|---------------|------------|-------------------------------|
| | | Statutory Designations ⁴⁷ | Non-Statutory | Total SINC | |
| Croydon | 74 | 355 ha | 1,245 ha | 1,598 ha | 18.5% |
| Kingston | 38 | 46 ha | 361 ha | 405 ha | 10.9% |
| Merton | 57 | 322 ha | 515 ha | 836 ha | 22.2% |
| Sutton | 47 | 37 ha | 634 ha | 688 ha | 15.7% |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

Species, habitats and ancient woodland

Table 6.55: Species and habitats

| | Number of species | Priority Habitats | Ancient Woodland (ha) |
|----------|-------------------|-------------------|-----------------------|
| Croydon | 2,914 | 9/9 | 318.7 ha |
| Kingston | 2,105 | 8/9 | 31.6 ha |
| Merton | 3,761 | 8/9 | 0 ha |
| Sutton | 2,442 | 7/9 | 0 ha |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

Green Belt and Metropolitan Open Land (MOL)

Table 6.56: Green Belt and MOL

| | Green Belt | | MOL | | Green Belt + MOL as % of borough |
|---------------|-------------------------|----------------------------|------------------|---------------------|----------------------------------|
| | Area of Green Belt (ha) | Green Belt as % of borough | Area of MOL (ha) | MOL as % of borough | |
| Croydon | 2,195 | 25.4% | 413 | 4.8% | 30.2% |
| Kingston | 639 | 17.2% | 545 | 14.6% | 31.8% |
| Merton | 0 | 0% | 963 | 25.6% | 25.6% |
| Sutton | 605 | 13.8% | 537 | 12.2% | 26.0% |
| SLWP | 3,439 | 16.8% | 2,458 | 12.0% | 28.7% |
| LONDON | 35,109 | 22.0% | 15,681 | 9.8% | 31.9% |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

Public Open Space and Urban Green Space

Table 6.57: Public open space and urban green space

| | Number of Open Spaces | Open Space Area (ha) | Percentage of Open Space |
|----------|-----------------------|----------------------|--------------------------|
| Croydon | 362 | 2,787 | 32.2% |
| Kingston | 264 | 1,378 | 37.0% |
| Merton | 327 | 1,330 ha | 35.4% |
| Sutton | 97 | 618 ha | 15.7% |

Source: Greenspace Information for Greater London (GiGL) (January 2019)

⁴⁷ SSSI, SPA, SAC, NNR, Ramsar or LNR

Green Infrastructure

Table 6.58: Blue and green space coverage for SLWP boroughs and within the plan area

| | Borough area (ha) | Green cover (ha) | Blue cover (ha) | Green & blue cover (ha) | Green cover (%) | Blue cover (%) | Green & blue cvr (%) |
|-------------|-------------------|------------------|-----------------|-------------------------|-----------------|----------------|----------------------|
| Croydon | 8,649.4 | 4,802.8 | 11.6 | 4,814.4 | 55.5% | 0.1% | 55.7% |
| Kingston | 3,726.1 | 1,953.4 | 39.3 | 1,992.7 | 52.4% | 1.1% | 53.5% |
| Merton | 3,762.5 | 1,835.4 | 31.9 | 1,867.3 | 48.8% | 0.8% | 49.6% |
| Sutton | 4,384.7 | 2,178.8 | 54.8 | 2,233.6 | 49.7% | 1.2% | 50.9% |
| SLWP | 20,522.7 | 10,770.4 | 137.6 | 10,908.0 | 52.5% | 0.7% | 53.2% |

Conservation Areas and Historic Environment

Table 6.59: Conservation Areas for SLWP boroughs and within the plan area

| | Conservation Areas | Areas of Special Local Character (ASLCs) | Listed Buildings Grade I, II or II* (at risk) | Locally listed buildings | Scheduled Ancient Monuments | Historic Parks and Gardens |
|----------|--------------------|--|---|--------------------------|-----------------------------|----------------------------|
| Croydon | 12 | 24 | 167 (6) | 1,000 (apprx) | 7 | not available |
| Kingston | 26 (277 ha) | 15 | 161 (3) ⁴⁸ | 148 | 6 | not available |
| Merton | 28 (657 ha) | n/a | 243 | 1,042 | 3 | 3 |
| Sutton | 15 (208.2 ha) | 23 | 205 (6) | 106 | 6 | 5 |

Source: Historic England and Local Plans

Table 6.60: Archaeological Priority Areas: Croydon

| APA | Size | APA | Size |
|------------------------------|----------|---------------------------------|-------------------|
| TIER 1 | | | |
| Croham Hurst Round Barrow | 0.66 | Park Lane Anglo-Saxon Cmtry | 1.31 |
| Riddlesdown Road | 6.37 | Russell Hill | 24.66 |
| Farthing Down | 85.92 | Elmers End | 3.97 |
| Lion Green Road | 3.55 | RAF Kenley | 78.95 |
| Tier 1 Total | | | 205.39 ha |
| TIER 2 | | | |
| Addington and Addington Park | 162.19 | Pollards Hill | 4.03 |
| Central Croydon | 90.25 | Deepfield Way | 1.95 |
| Old Coulsdon | 14.84 | Hook Hill | 14.99 |
| Sanderstead | 37.13 | Cane Hill | 79.27 |
| Watendone | 9.09 | Ashburton Park | 8.54 |
| Ampere Way | 126.69 | Haling Grove | 3.97 |
| Waddon | 65.93 | Norwood Grove | 9.99 |
| Mere Bank | 61.83 | London to Brighton Roman Road | 335.35 |
| Addington Hills | 104.36 | London to Lewes Roman Road | 37.54 |
| Croham Hurst | 82.36 | Croydon 19th Century Cemeteries | 14.35 |
| Pampisford Road | 31.49 | | |
| Tier 2 Total | | | 1,296.1 ha |
| TIER 3 | | | |
| Croydon Downs | 1,672.15 | | |
| Tier 3 Total | | | 1,672.2 |
| LB Croydon total | | | 30 APAs |
| Area | | | 3,173.7 ha |
| Percentage of Borough | | | 36.7% |

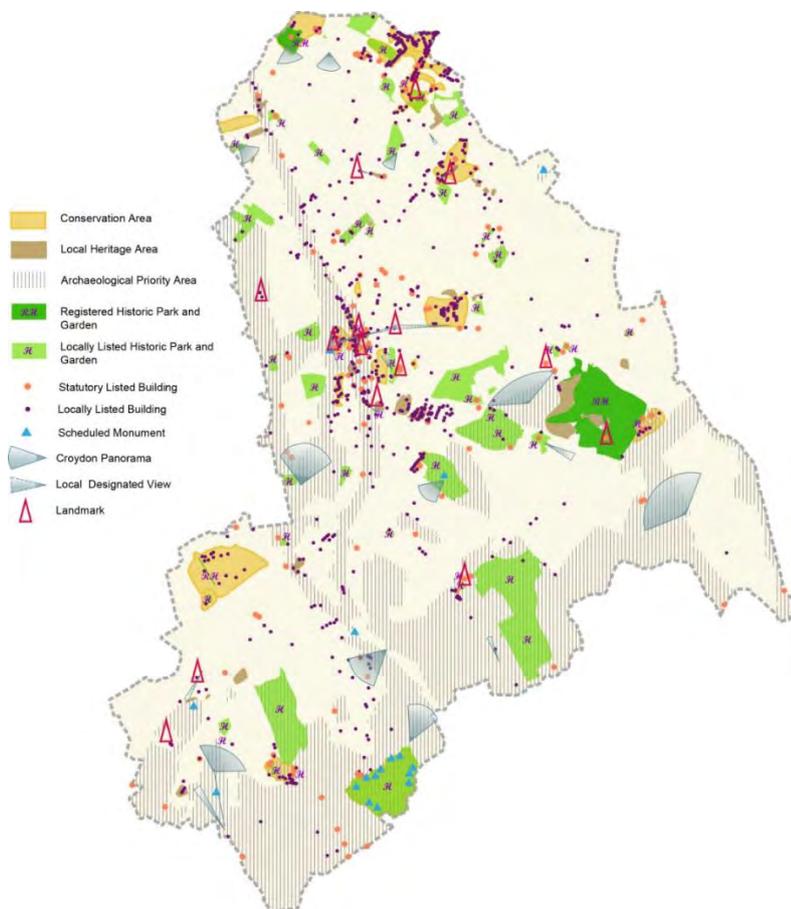
⁴⁸ despite the small number of statutory listed buildings in Kingston, there are over 200 designated 'Buildings of Townscape Merit' (BTM)

Table 6.61: Archaeological Priority Areas: Merton

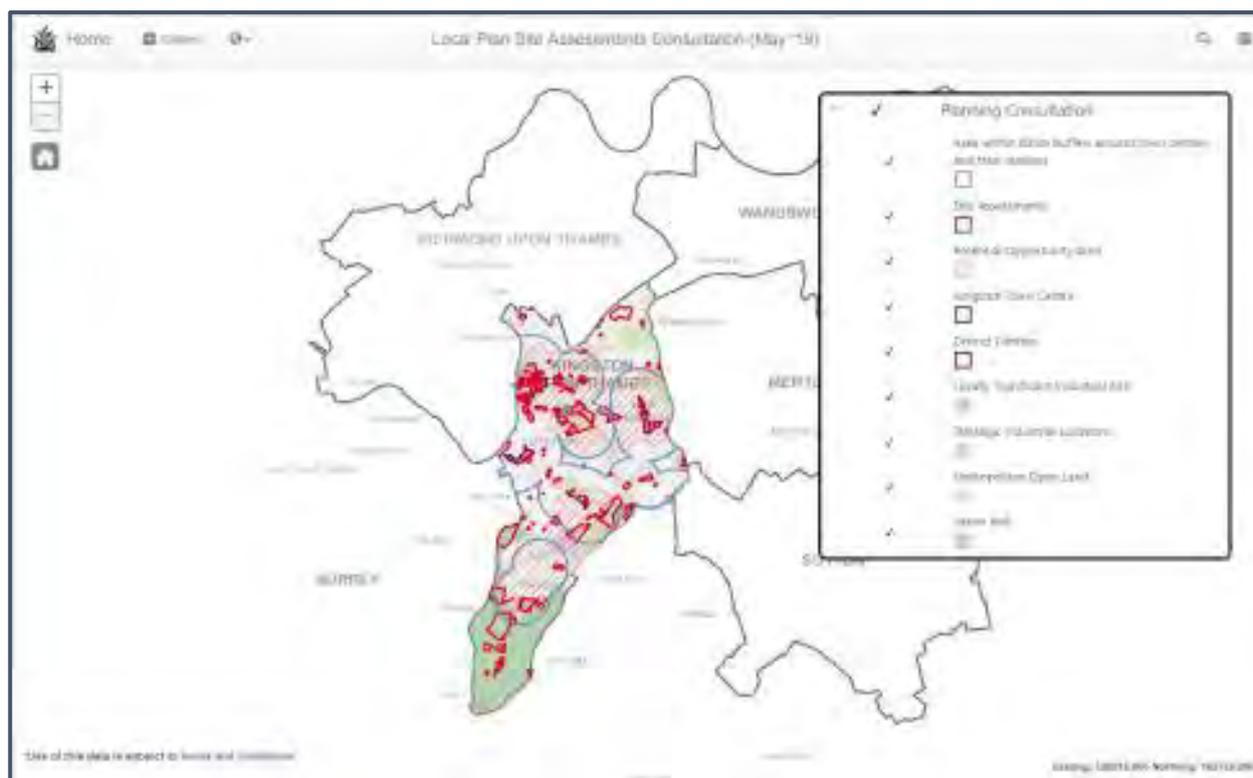
| APA | Size | APA | Size |
|----------------------------------|--------|-------------------------------------|-------------------|
| TIER 1 | | | |
| Caesar's Camp | 27.35 | Morden Park Mound | 0.42 |
| Merton Priory | 10.28 | Ravensbury Saxon Cemetery | 10.79 |
| Tier 1 Total | | | 48.84 ha |
| TIER 2 | | | |
| Wandle Valley / Colliers Wood | 93.13 | Cannizaro | 67.64 |
| Wandle Valley / Morden Hall Park | 59.97 | Cannon Hill | 20.81 |
| Wandle Valley / Mitcham | 74.18 | Merton Place | 4.53 |
| Wimbledon Common | 237.41 | Wimbledon Park House | 90.07 |
| Merton Village | 47.48 | Lavender Park | 6.54 |
| Mitcham | 131.48 | West Barnes Farm | 5.22 |
| Morden | 48.41 | Stane Street | 47.84 |
| Wimbledon Village | 97.37 | 19 th Century Cemeteries | 32.67 |
| Tier 2 Total | | | 1.064.8 ha |
| TIER 3 | | | |
| Wandle Valley/Earlsfield | 60.44 | Mitcham Common | 198.31 |
| Beverley Brook | 57.59 | | |
| Tier 3 Total | | | 316.34 ha |

| | |
|------------------------------|-------------------|
| LB Merton total | 23 APAs |
| Area | 1,429.9 ha |
| Percentage of Borough | 38.0% |

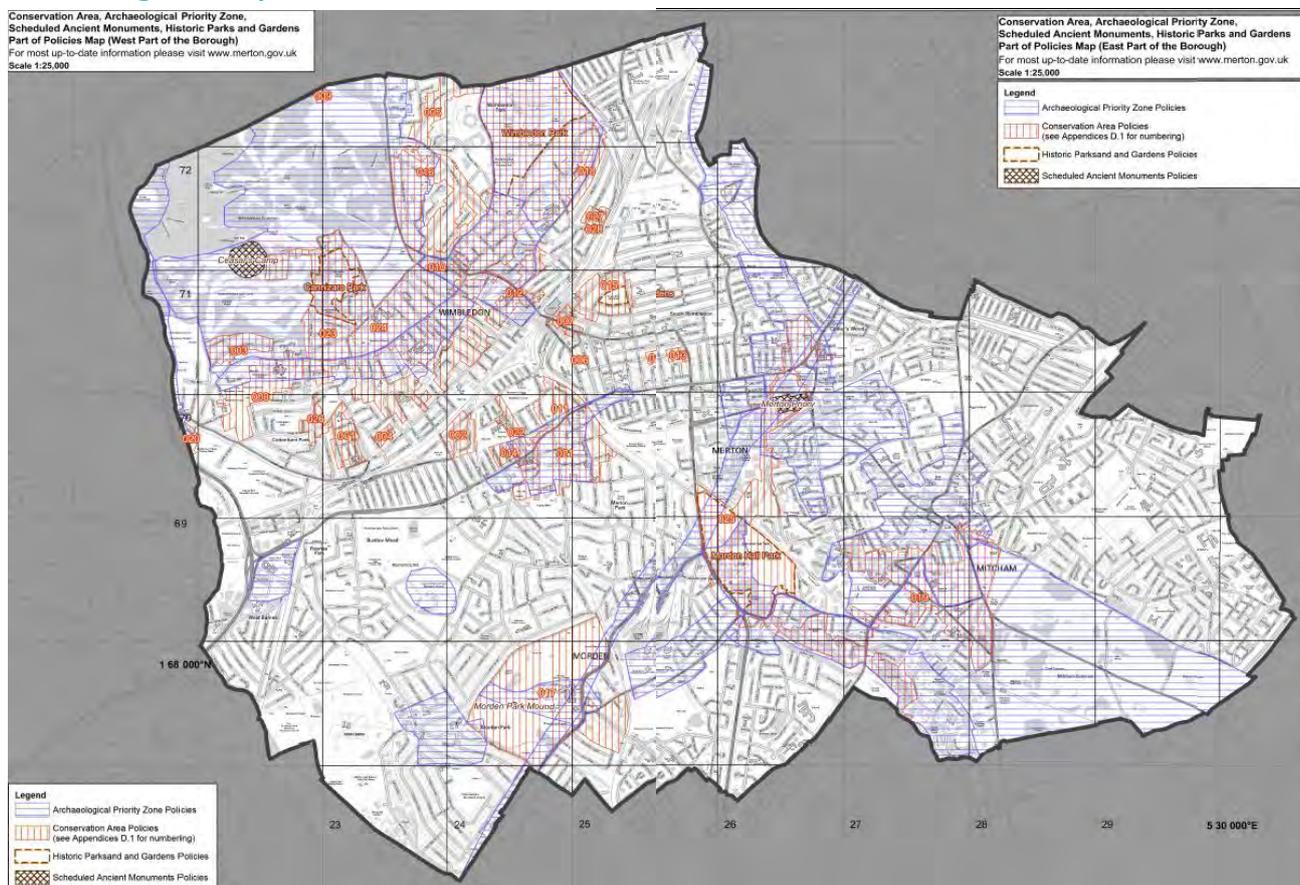
Heritage Map of Croydon



Heritage Map of Kingston⁴⁹



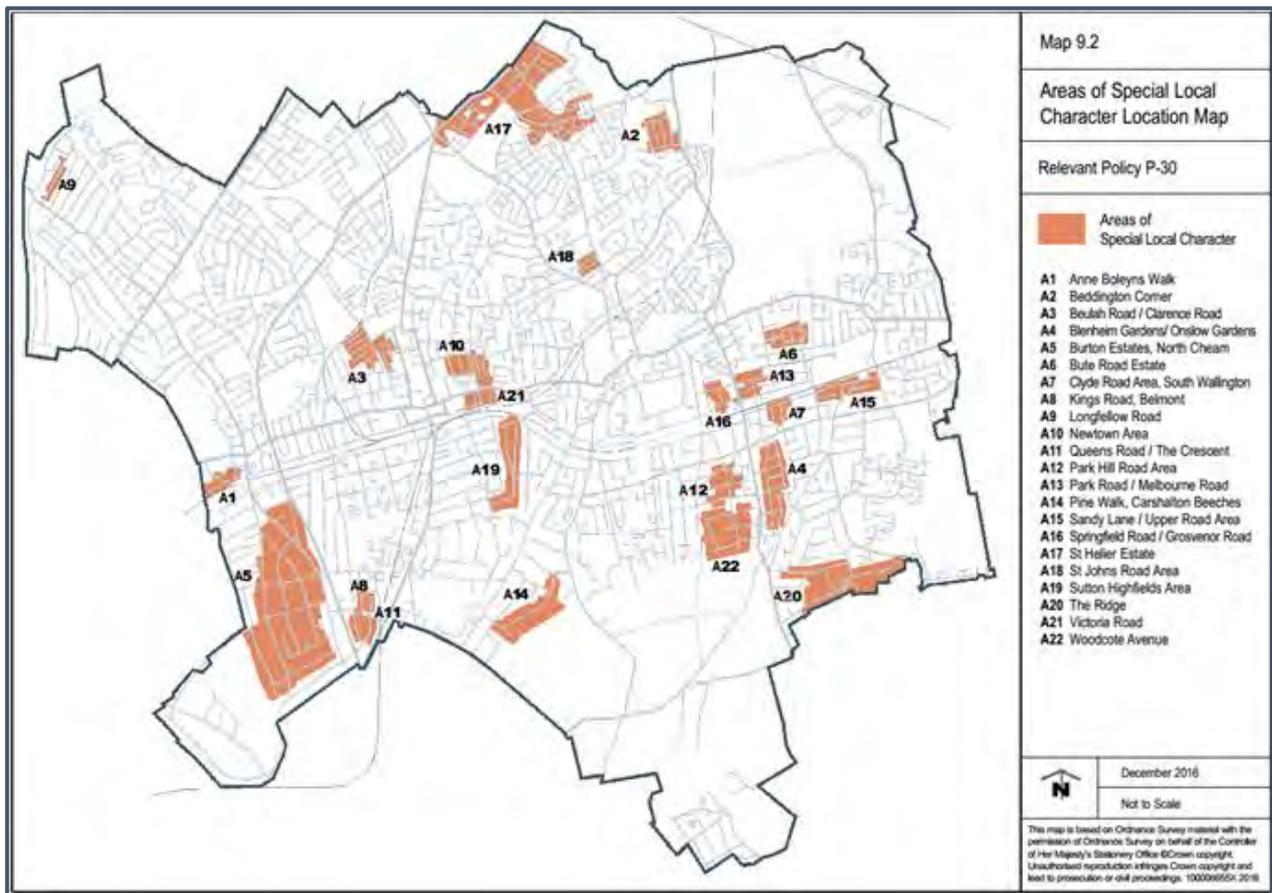
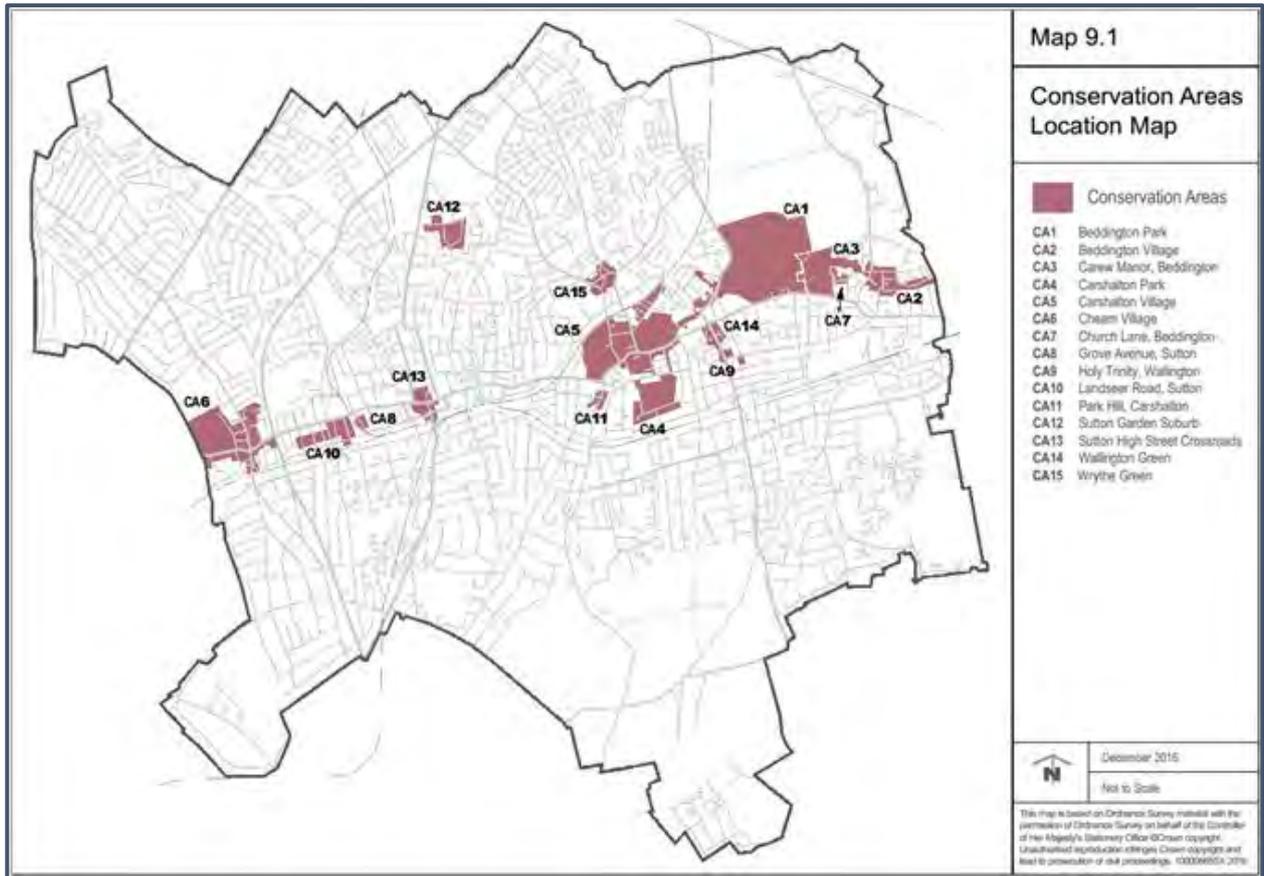
Heritage Map of Merton⁵⁰



⁴⁹ <https://maps.kingston.gov.uk/maps/MapPage.aspx?map=heritagef>

⁵⁰ [https://www2.merton.gov.uk/merton sites and policies part ii borough wide policies maps.pdf](https://www2.merton.gov.uk/merton%20sites%20and%20policies%20part%20ii%20borough%20wide%20policies%20maps.pdf)

Heritage Maps of Sutton



7. Key Sustainability Issues (Task A3)

Identifying key sustainability issues and problems

7.1 This chapter sets out the key environmental, social and economic issues which need to be taken into account in preparing updated waste policies and proposals for inclusion in the new South London Waste Plan (SLWP). These have been identified on the basis of:

- key sustainability issues identified in government guidance on SA⁵¹, current best practice and criteria developed previously for the purpose of appraising the existing SLWP, Sutton's Local Plan 2018 and the Intend to Publish London Plan.
- other policies, plans, programmes and sustainability objectives relevant to or likely to be affected by the new plan as set out in Section 5 of this document;
- the current environmental, social and economic baseline for the four boroughs and future trends, including projected household growth and industrial land supply, over the plan period to 2036 (Section 6);
- existing and planned waste management facilities within South London, annual throughputs of local authority collected waste (household), commercial and industrial (C&I), construction, demolition and excavation waste (CD&E) and other waste streams; waste imports and exports to and from the plan area; and current performance against the London Plan 2016 apportionment (Section 3); and
- existing planning constraints and emerging opportunities for promoting sustainable waste management practices in south London.

7.2 Further sustainability issues have been identified for inclusion in this chapter in the light of feedback from statutory consultees and the response to public consultation at the 'Issues and Preferred Options' stage.

Issue 1: Sustainable Waste Management: Self-Sufficiency

7.3 The key sustainability issues in relation to managing south London's waste arisings up over the plan period from 2021 to 2036 are as follows:

- how much additional land should the plan allocate for sustainable waste management to meet the combined apportionments for household and C&I waste⁵² in the Intend to Publish London Plan (i.e. net self sufficiency) over the plan period?
- should the plan seek to either:
 - meet the new apportionment targets by safeguarding sufficient land and sites to manage 100% (and no more) of projected household and C&I waste arisings over the plan period to 2036? or
 - seek to further exceed the new apportionment targets by allocating additional land, promoting the intensification of existing sites or converting existing waste transfer facilities to waste management facilities?
- to what extent can the four boroughs seek to further reduce the level of waste exports to other waste planning authorities within the South East, particularly with regard to CD&E waste streams, given the available evidence on existing capacity and throughputs within the plan area and forecast arisings up to 2036;

⁵¹ 'SA of Regional Spatial Strategies and Local Development Documents' (ODPM, November 2005)

⁵² 887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 and 929,750 by 2036

- how can the plan achieve an optimal balance between safeguarding sufficient land for waste management uses over the plan period and meeting the significant future demand for land for non-waste industrial uses, taking into account the borough classifications for the management of industrial floorspace capacity in the draft London Plan? (as detailed in Table 6.31 in Section 3, Sutton falls within the 'Provide Capacity' categorisation⁵³ and the remaining three boroughs fall within the 'Retain Capacity' categorisation);
- given that there is already sufficient capacity⁵⁴ within the four boroughs to manage forecasted construction and demolition waste arisings for the end of the plan period in 2036 (with a surplus of +5,895 tonnes per annum in 2036), to what extent – if at all – does the plan need to safeguard land for the management of future CD&E waste arisings?
- is there a need to allocate additional land, promote the intensification of existing sites within the plan area or make specific policy provisions for hazardous waste arisings in the new plan⁵⁵;
- how should progress against the combined apportionment and self-sufficiency targets be monitored over the plan period, and what level of contingency needs to be planned for in the light of existing management capacity and forecasts for future waste arisings up to 2036?
- what account should be taken of the following considerations, each of which may lead to a significant reduction in household and C&I and CD&E waste arisings over the plan period:
 - the Mayor's annual housing delivery targets for each of the four partner boroughs in the Intend to Publish London Plan (December 2019) are now significantly lower than those included in the draft London Plan (December 2017);
 - the GLA's recently updated 'housing-led' and 'trend-based' population projections (2018-based) (February 2020)⁵⁶ would suggest that there will be a significantly reduced rate of population increase - and hence less waste being generated - within each of the four Boroughs over the period of the new SLWP;
 - the Covid-19 pandemic, which has led to the introduction of a 'lockdown' throughout the UK from 23 March 2020, is expected to have a hugely significant impact on economic activity and industrial output for many years to come. It is a reasonable assumption that future levels of waste generation, at least for the early years of the new SLWP, are likely to be much lower than the current forecasts would indicate.

Issue 2: Sustainable Waste Management: Spatial Strategy and Strategic Approach

7.4 The key sustainability issues are as follows:

- is the spatial strategy and strategic approach of safeguarding and intensifying existing sites the most appropriate strategy compared to the other reasonable alternatives of:
 - safeguarding existing sites and identifying new sites;
 - safeguarding existing sites and designating preferred industrial areas; or
 - safeguarding existing sites and designating all industrial areas as potential waste sites?
- which existing waste management sites and areas, including those with waste management facilities already in place, other sites allocated in the existing SLWP and industrial areas already identified as potentially suitable for waste facilities, should continue to be safeguarded and therefore carried forward in the new plan?

⁵³ according to the 'Intend to Publish' London Plan 2019 and the London Industrial Land Supply and Economy Study (CAG Consultants 2016), LB Sutton should seek to deliver intensified floorspace capacity in existing and/or new locations over the London Plan period

⁵⁴ the revised throughput figures in Section 3 (Table 3.6) indicate that there is already a surplus of capacity for construction and demolition waste

⁵⁵ CD&E waste arisings in South London are projected to increase from 523,526 tpa in 2021 to 550,975 tpa in 2036

⁵⁶ the GLA's updated 'housing-led' and 'trend-based' population projections (2018-based) (Feb 2020) are set out in Figure 6.3 (Section 3)

- which waste sites identified in the existing SLWP have since been developed, permitted and/or allocated for other uses and can no longer contribute towards managing south London's waste?
- how can the waste management capacity of existing waste sites, particularly waste transfer sites, be optimised through the intensification of uses?
- which existing waste management sites and industrial areas identified as potentially suitable for waste facilities have potential for intensification and/or for converting existing waste transfer facilities to waste management operations?
- to what extent can existing waste management facilities, existing site allocations and industrial areas already identified as potentially suitable for waste facilities contribute to meeting the capacity gap over the plan period both with and without the intensification of existing operations?.
- what criteria should be used to evaluate the suitability of any new waste sites, areas suitable for waste facilities or proposals to increase the capacity of existing sites?
 - the nature of the activity, its scale and location;
 - implementation of the waste hierarchy and contribution to the circular economy;
 - achieving a positive carbon outcome⁵⁷;
 - potential impacts on local amenity, including noise, odours, air quality and visual;
 - proximity to strategic routes and the impact of vehicle movements on local roads;
 - proximity to sustainable modes of transport;
 - physical and environmental constraints, including flood risk;
 - proximity to residential areas and other sensitive receptors;
 - job creation and social benefits, including skills, training and apprenticeships; and
 - potential for intensification or co-location with complementary industrial/waste uses.
- is the balance between the four boroughs in terms of waste management capacity appropriate given that Sutton (664,641 tpa) and Merton (213,179 tpa) currently manage a much larger share of household and C&I waste arisings than Kingston (35,642 tpa) and Croydon (32,883 tpa)?

Issue 3: Sustainable Waste Management: Prevention, re-use, recycling and recovery

7.5 The key sustainability issues are as follows:

- how can the plan help to deliver a further shift towards practices towards the top of the government's waste hierarchy?
- can the plan further encourage minimisation and prevention through the reuse of materials and using fewer resources in the production and distribution of products?
- how can the plan contribute towards the following targets in the draft new London Plan and London Environment Strategy:
 - the equivalent of 100% of south London's waste is managed within London by 2026 for all waste streams except excavation waste (i.e. net self-sufficiency);
 - zero biodegradable or recyclable waste to landfill by 2026;
 - at least 65% recycling of municipal waste by 2030;
 - 95% reuse/recycling/recovery of construction and demolition waste; and
 - 95% beneficial use of excavation waste
- what scope exists for the plan to support even higher recycling targets for municipal waste than the 65% target set out in the London Environment Strategy ?

⁵⁷ the draft new London Plan requires that all energy from waste (EfW) facilities must demonstrate a minimum performance of 400g of CO₂ equivalent per kilowatt hour of electricity produced

Issue 4: Sustainable Waste Management: Promoting the Circular Economy

7.6 The key sustainability issues are as follows:

- can the plan help to promote a transition to a circular economy within south London that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible?
- how can the potential economic benefits of the plan be maximised in terms of job creation and supporting the local manufacturing sector by achieving resource efficiency, waste reduction and a significant improvement in reuse and recycling performance⁵⁸ (reuse, repair, re-manufacturing and materials innovation)?
- should the plan support the co-location of complementary uses such as secondary material processing facilities in order to support manufacturing from waste?
- can the plan support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets?
- should the plan consider introducing a requirement for all major planning applications to achieve 'net zero-waste' and be supported by a Circular Economy Statement?
- should the plan seek to promote technologies that produce fuels that can be used to power waste management and industrial processes (e.g. biofuels and hydrogen)?

Issue 5: Climate Change Mitigation

7.7 The key sustainability issues are as follows:

- should the policies and proposals of the plan be 'technology neutral' or promote specific technologies?
- should the policies and proposals of the plan actively promote opportunities to use residual waste arisings in south London as a renewable source of energy to power complementary waste management or other industrial processes?
- in the context of the current 'climate emergency'⁵⁹, should the plan go beyond current London Plan policy requirements to further minimise CO₂ emissions on-site through application of the Mayor's updated energy hierarchy and achieve zero carbon standards through developer contributions to a council-managed carbon offset fund?
- should policy measures be included to minimise embodied energy and the 'carbon footprint' associated with construction materials used for new waste management facilities as measured by the BRE's⁶⁰ Building life cycle assessment' methodology.

Issue 6: Climate Change Adaptation

7.8 The key sustainability issues are as follows:

- how can the design and layout of new waste management facilities incorporate green infrastructure and maximise its benefits for a range of adaptation objectives, including flood risk management, urban cooling, mitigation the impact of drought conditions, maintaining biodiversity and habitats and environmental enhancement?
- to what extent can the design and layout of new or upgraded waste management facilities minimise overheating and contribution to the urban heat island (UHI) effect, for example by

⁵⁸ 'Towards a circular economy, LWARB 2015 and Employment and the circular economy – job creation through resource efficiency in London' (LWARB 2015) available at <http://www.lwarb.gov.uk/what-we-do/accelerate-the-move-to-a-circular-economy-in-london/>

⁵⁹ in July 2019, the London Borough of Sutton declared a climate emergency and a borough target to achieve net zero carbon by 2030

⁶⁰ Building Research Establishment

permeating the development with blue and green spaces and incorporating a range of natural cooling measures as part of the design and layout, including passive design measures (e.g. building orientation), shading, planting and soft landscaping, trees, ponds, SUDS measures and other surface water features?

- the need for the plan to support continued partnership working with the Environment Agency (EA) to ensure waste management infrastructure is fit for purpose and resilient to a changing climate and to support a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process;
- should the plan set minimum green infrastructure targets for all new or upgraded waste management facilities and require green roofs wherever feasible? and
- what contribution can the plan make towards the Mayor's long-term target for more than 50% of London to be green by 2050?

Issue 7: Flood risk, sustainable drainage (SuDS) and water resources

7.9 The key sustainability issues are as follows:

- what additional policy measures should be included to minimise all sources of flood risk to and from new and existing waste management sites in south London and to reduce flood risks overall, taking climate change into account?
- to what extent can the 'sequential' and 'exceptions tests' be applied to the identification of waste management sites for inclusion in the new plan, taking account of the latest available information on flood risk in south London⁶¹?
- should the plan include further policy measures to require all waste proposals to incorporate SuDS measures and achieve greenfield run-off rates and volumes?
- how can any residual flood risks arising from waste management sites be safely mitigated through the use of flood resistance or resilience measures where required?
- how can the plan help to ensure that waste facilities and related activities do not adversely affect the quality of watercourses or groundwater within south London?
- how can the plan promote water efficiency measures in existing and new waste facilities having regard to the proximity of vulnerable natural water stores

Issue 8: Sustainable design and construction

7.10 The key sustainable design and construction issues are as follows:

- should the plan set a minimum BREEAM rating⁶² to be met by all new waste management facilities or should this policy requirement take account of the nature of the proposed facility (e.g. sorting and baling facility only, shell buildings or the full-scale redevelopment of a large site)?
- what alternative accreditation methods could be used in place of BREEAM to demonstrate the environmental performance of newly proposed waste management facilities e.g. the CEEQUAL scheme⁶³ developed by the Building Research Establishment (BRE) for infrastructure projects?

⁶¹ based on the joint strategic flood risk assessment (SFRA) Level 1 and Level 2 reports for Croydon, Merton, Sutton and Wandsworth (AECOM, 2015), the EA's flood map for planning and 'Risk of Flooding from Surface Water (RoFSW)' map

⁶² the appropriate scheme is currently the BREEAM New Construction 2018

⁶³ the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at <https://www.ceequal.com/>

- should the plan seek to further minimise environmental life cycle impacts by requiring developers to conducting Life Cycle Assessment and integrating its outcomes in the design decision-making process?
- should the plan include policy criteria to further minimise environmental impacts from construction products⁶⁴?
- should the plan further encourage responsible sourcing of construction products?
- should the plan include policy measures to increasing the lifespan of the waste-related buildings through designing for durability and adaptability? and
- should the plan include policy criteria to encouraging the reduction of environmental impacts through optimising the use of materials during all stages of the project?

Issue 9: Transport

7.11 The key sustainable design and construction issues are as follows:

- what further policy measures are needed to minimise HGV movements, traffic congestion, greenhouse gas emissions, local air pollution, noise and vibration associated with waste-related transport within south London?
- to what extent can the plan support sustainable transport objectives by:
 - locating waste management facilities close to where waste is produced?
 - maximising opportunities for the intensification of existing waste sites and industrial areas identified as potentially suitable for waste facilities thus avoiding the need for new waste management sites to be developed and associated trips?
 - co-locating complementary waste management or secondary material processing facilities in line with circular economy principles?
- how can the plan minimise the adverse impacts of waste-related transport movements on local roads and sensitive receptors?
- is the capacity and condition of the existing local and strategic road network within south London sufficient to accommodate the expected growth in waste-related trips associated with dealing with south London's waste apportionment up to 2036?
- the need to take account of cumulative impacts on the local and strategic road network;
- contributions may be requested towards improvements that support travel for staff on foot, cycle or by public transport where appropriate. Furthermore, cycle parking and car parking, including the provision of electric charging facilities, should be in line with the draft London Plan policies T5 and T6?
- the need to ensure that safeguarded waste sites do not conflict with the planned Crossrail 2 southern hub at Wimbledon; and
- how can the plan increase the potential role of sustainable modes of transport e.g. rail in transporting south London's waste arisings?

Issue 10: Air Quality

7.12 The key sustainability issues in relation to air quality are:

- how can the policies and proposals of the plan further mitigate the potential impacts of local air pollution arising both from the operation of new and existing waste management facilities and associated transport movements?

⁶⁴ for example through requiring submission of Environmental Product Declarations (EPD)

- how can the plan contribute towards improving air quality within identified Air Quality Management Areas (AQMAs) and other areas where national standards for particulates (PM10) and nitrogen oxides (NO_x) are currently being breached?
- what further policy requirements should be incorporated as part of the plan to ensure that proposed waste developments within south London are at least 'air quality neutral' based on the emissions benchmarks set out in the Mayor's Sustainable Design and Construction SPG?
- how can the policies and proposals of the plan promote the use of design solutions, such as green infrastructure and screening, to prevent or minimise increased exposure to existing air pollution?
- to what extent can the plan require potentially polluting waste management operations such as the sorting of recyclables to be enclosed?
- in seeking to mitigate the potential impacts of local air pollution, can the plan maintain a 'technology neutral' approach to the development of waste management facilities? And;
- to what extent should the plan should allocate broad types of facility to each site e.g. enclosed or open?

Issue 11: Environmental protection

7.13 The key issues in relation to minimising the potentially adverse impacts of waste management facilities on environmental quality and local amenity are as follows:

- should the plan include policy criteria to mitigate the adverse effects of noise, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?
- what locational criteria should be used to assess the suitability of new waste management facilities in terms of the proximity of sensitive receptors to noise, vibration and odours generated during both the construction and operational phases;
- should the plan set out common requirements in relation to the content of Construction Environmental Management Plans submitted in support of proposals for new waste management facilities across the four partner boroughs?
- how can the plan limit potential pollution associated with the operation of waste management facilities and its potentially adverse impacts on neighbouring uses?
- what further policy measures should be included to reduce the number and total area of contaminated sites within south London requiring remediation? and
- what further policy measures or criteria should be included in the plan to further prioritise the re-use of previously-developed ('brownfield'), derelict or underused land/ premises within south London for waste management uses?
- how should the new plan incorporate the 'agent of change' principle, as set out in national and regional planning policy, in order to ensure that new sensitive developments located close to established waste uses are required to incorporate appropriate mitigation measures in order to minimise potential adverse environmental impacts on occupants;
- the need to take account of high voltage overhead lines and the high pressure gas grid in identifying new or intensified waste sites.

Issue 12: Biodiversity and Habitats

7.14 The key sustainability issues in relation to biodiversity and habitats are as follows:

- is the plan likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?

- what approach should be followed in screening the plan at the issues and options stage to determine whether or not a Habitats Regulations Assessment (HRA)⁶⁵ needs to be carried out?
- which European sites are in sufficiently close proximity to the south London plan area to be considered for the purpose of HRA screening? Richmond Park SAC; Wimbledon Common SAC; Mole Gap to Reigate Escarpment SAC; and/or Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA)?
- how should the plan ensure that new and existing waste management facilities minimise any potential impacts upon regionally or locally designated wildlife sites?
- how will the plan potentially affect local Biodiversity Action Plan (BAP) targets in relation to priority habitats and species within each of the four partner boroughs; and
- how can the waste plan maximise the area of habitat created, improved or managed as a consequence of waste related developments and promote opportunities for enhancing river catchments and local green corridor networks.

Issue 13: Local Economy and Employment

7.15 The key sustainability issues are as follows:

- how can the plan's effectiveness be maximised in promoting investment, local employment opportunities and the competitiveness of the waste management sector within South London, particularly by promoting the circular economy and new waste management technologies nearer the top of the waste hierarchy?
- in order to ensure that employment land supply matches demand across the four boroughs, and given that most industrial uses⁶⁶ have a significantly higher jobs density than waste management uses, should the plan seek to retain employment land for industrial uses within strategic industrial locations (SIL) and established industrial areas, and therefore no longer identify these areas as potentially suitable for waste management uses (provided that sufficient sites can be allocated to meet the apportionment up to 2036)
- how much industrial land and floorspace within the four south London boroughs and across the wider Wandle Valley Property Market Area (including Wandsworth) should be retained or potentially released for waste related uses having regard to (a) the need to maintain a sufficient supply of land and premises to meet current and future demands for industrial (non-waste-related) and related functions; and (b) the borough-level categorisations in Table 6.2 of the London Plan which identifies that Sutton should 'provide capacity' and that the other three boroughs should 'retain capacity' for non-waste related industrial uses.
- to what extent should the plan promote co-ordination initiatives with London Remade and other partners to ensure that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?
- in promoting south London's transition towards a circular economy, how can the plan maximise economic benefits to local communities in the form of new products and employment, for example through managing waste more locally by optimising existing facilities and building new reuse and recovery facilities?
- what is the potential contribution of the plan in promoting south London's economy, facilitating innovation and competitiveness and supporting existing businesses to expand and new business to start-up (particularly SMEs).

⁶⁵ also known as 'Appropriate Assessment'

⁶⁶ these are generally uses falling within the Use Classes B1(b) research & development, B1(c) light industrial; B2 industrial and manufacturing; and B8 storage & distribution and therefore appropriate forms of development within SILs and established industrial areas

Issue 14: Historic Environment, Townscape and Visual Amenity

7.16 The key sustainability issues are as follows:

- how can the plan ensure that new and existing waste management facilities do not adversely impact upon the historic environment of the four boroughs – specifically the character, appearance and setting of Conservation Areas; Areas of Special Local Character (ASLCs); listed buildings, historic parks and gardens, scheduled ancient monuments (SAMs) and Archaeological Priority Areas?
- how can the plan ensure that the plan preserves and enhances the quality and distinctiveness of south London’s historic environment and cultural assets?
- the need to conserve and enhance designated and non-designated heritage assets (including archaeology) and the contribution made by their settings;
- how can the plan avoid increasing the number of heritage assets at risk from neglect, decay or development pressures?
- How can the plan protect areas where there is likely to be a further significant loss or erosion or landscape/townscape character or quality, or where development has had or is likely to have a significant impacts (direct or indirect) upon the historic environment and/or people’s enjoyment of it?
- how can the plan avoid adverse effects upon the historic environment arising from traffic congestion, air quality, noise pollution and other issues?
- how can the plan ensure that new and existing waste management facilities are constructed to high quality design principles that respect local character and do not adversely affect local townscape? and
- how can the plan minimise the number of new waste management facilities located within areas of designated landscape value?

Issue 15: Human Health and Quality of Life

7.17 The key sustainability issues are as follows:

- how should the plan protect and enhance local amenity and the quality of the townscape for residents living near new and existing waste management facilities?
- how should the plan minimise the potentially adverse impacts of waste developments, transport and associated activities on public health and promote ‘Healthy Streets’ principles in line with the Mayor’s Transport Strategy?
- how can the plan minimise potential conflicts with vulnerable road users and the risk of accidents involving waste vehicles in line with the Mayor’s Vision Zero approach and ensure the safe operation of waste management facilities for employees and visitors?
- should the plan include a requirement for proposed waste developments to be accompanied by a Delivery and Servicing (DSP) plan?
- how can the design and layout of waste management facilities integrate ‘designing out crime’ principles and contribute to public perceptions of safety?
- how can the policies and proposals of the plan help to ensure that new or upgraded waste management facilities within south London promote inclusive designs
- how can the amenity and quality of life of local residents be balanced against the operational requirements of new or upgraded waste management facilities within south London, particularly within areas affected by social deprivation
- is the current level of protection for the permanence, integrity and openness of Green Belt and Metropolitan Open Land (MOL) within the four boroughs sufficient?

- how should the plan minimise the loss of public open space and ensure that there is no increase in the area of public open space deficiency as a consequence of waste development?
- should the plan include policy criteria to further minimise potential visual intrusion of waste related developments on nationally or locally important landscapes?
- how can the plan tackle waste crime (in 2015, illegal waste activity was estimated to have cost over £600 million in England alone)? and
- how can the plan ensure that waste related developments do not adversely affect strategic views from within and from outside the plan area?

Issue 16: Equalities, Accessibility and Social Inclusion

7.18 The key sustainability issues are as follows:

- what criteria should be identified as the basis for carrying out an Equalities Impact Assessment (EqIA) on the emerging plan?
- how can the plan enhance public access for all groups of the population, including equalities groups, to reuse and recycling centres accepting household waste in South London?
- how can the plan further promote social inclusion by addressing potential inequalities arising as a result of current waste management arrangements in south London.
- In what ways can the plan address fuel poverty issues?
- should the plan maximise the potential for locating waste management facilities within easy access of areas of social deprivation (as measured by the employment and income domains of the Government's Index of Multiple Deprivation) and thus providing new employment opportunities in the waste management sector?
- how can the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?
- what is the potential contribution of the plan to achieving an increase in public awareness of sustainable waste management issues?
- what benefits can the plan deliver to local communities in the form of new products and employment, for example by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?
- how can the policies and proposals of the plan help to address inequalities, particularly within deprived areas, encourage social cohesion and promote inclusive neighbourhoods? and
- how can the plan help to promote job opportunities for all?

8. Sustainability Appraisal Framework for the South London Waste Plan (Task A4)

Developing Sustainability Objectives, Indicators and Targets

8.1 A comprehensive range of sustainability objectives, indicators and targets has previously been identified through the SA Scoping Report and subsequently at the issues and preferred options stage (with minor amendments) for the purpose of appraising emerging plan options. The finalised SA Framework, which has been carried forward in this report, has been developed on the basis of other policies, plans, programmes identified in Section 5 (Task A1); the environmental baseline in Section 6 (Task A2); and the key issues identified in Section 7 (Task A3). As shown in Table 8.2 overleaf, the SA Framework consists of 16 broad topic areas reflecting the aims of national planning policy, the Mayor's Environmental Strategy, the Intend to Publish London Plan and local planning objectives. These are arranged under the categories of (a) sustainable waste management (b) climate change (c) environmental quality, and (d) community well-being.

8.2 The full SA Framework, including sustainability objectives, appraisal questions, indicators and a cross reference to the key issues identified in Section 7, is set out in Table 8.3. It should be noted that the SA Framework overlaps to some extent with the SLWP Monitoring and Contingency Table included as Appendix 1 of the draft plan, particularly in relation to the waste hierarchy and self-sufficiency targets for South London.

Scoring system

8.3 The scoring system for use in the appraisal of preferred policy options and strategic alternatives, including significance ratings, is set out below in Table 8.1.

Table 8.1: Scoring system for use in the appraisal

| Symbol | Scale of effect |
|--------|---|
| +++ | Large beneficial impacts |
| ++ | Medium beneficial impacts |
| + | Smaller beneficial impact |
| - | Neutral or no impact |
| x | Smaller negative impact |
| xx | Large negative effect. |
| ? | Uncertain impact and/or the nature and magnitude of the impact is subject to the implementation of other planning policies. |

Plan monitoring

8.4 In order to address the requirement for plan monitoring in the national planning policy framework (NPPF) and feedback received at the issues and preferred options stage, a 'Monitoring and Contingency Table' has been included in Appendix 1 of the draft Plan (Submission Version). Annual reporting of the indicators and targets in the Monitoring and Contingencies Table will take place through the preparation of Sutton's Authority Monitoring Report (AMR).

8.5 The SA Framework developed through the sustainability appraisal process has helped to ensure that the Monitoring and Contingencies Table covers an appropriate range of indicators.

Table 8.2: Summary of the SA Framework

| |
|---|
| (A) SUSTAINABLE WASTE MANAGEMENT |
| <p>(1) Net Self-sufficiency To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period.</p> <p>(2) Spatial Strategy and Strategic Approach To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land.</p> <p>(3) Waste re-use, recycling and recovery To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery</p> <p>(4) Circular economy To promote a transition to a circular economy within south London.</p> |
| (B) CLIMATE CHANGE |
| <p>(5) Climate Change Mitigation To address the causes of climate change by minimising CO2 emissions from waste facilities.</p> <p>(6) Climate Change Adaptation To ensure that all waste management facilities are fully adapted to the impacts of climate change.</p> <p>(7) Flood risk and sustainable drainage (SuDS) To avoid, reduce and manage flood risk to or from waste management facilities.</p> <p>(8) Sustainable Design and Construction To promote the highest standards of sustainable design and construction in new waste facilities.</p> |
| (C) ENVIRONMENTAL QUALITY |
| <p>(9) Transport To reduce trips, traffic congestion and pollution arising from waste -related HGV movements.</p> <p>(10) Air Quality To minimise air pollution and impacts on sensitive land-uses arising from waste facilities.</p> <p>(11) Environmental protection To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases.</p> <p>(12) Biodiversity and Habitats To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive.</p> |
| (D) COMMUNITY WELL-BEING |
| <p>(13) Local Economy and Employment To promote local employment opportunities, and the competitiveness of the waste management sector within South London.</p> <p>(14) Historic Environment, Townscape and Visual Amenity To avoid the potentially adverse impacts of waste management facilities on the historic environment, townscape quality and visual amenity by promoting high standards of design and layout.</p> <p>(15) Human Health and Quality of Life To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment.</p> <p>(16) Equalities, Accessibility and Social Inclusion To reduce exclusion, address inequalities & improve accessibility for all equalities target groups.</p> |

SA FRAMEWORK FOR THE SOUTH LONDON WASTE PLAN

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|--|---|---|--------------------|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | |
| <p>Objective 1: Net self-sufficiency</p> <p>To provide sufficient sites and waste management facilities to deal with all waste streams making up South London's apportionment over the plan period</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal help to provide sufficient sites and waste management facilities in south London to meet the combined apportionment targets⁶⁹ for household and commercial & industrial (C&I) waste over the plan period?</i> ➤ <i>Will the policy or proposal help to provide sufficient sites and waste facilities to manage other waste arisings, including construction, demolition & excavation (CD&E) waste and hazardous waste, over the plan period?</i> ➤ <i>Will the policy or proposal reduce waste arisings needing to be managed by promoting waste reduction, reuse and manufacturing from waste?</i> ➤ <i>Will the policy or proposal reduce the proportion of recyclable waste exported outside the plan area?</i> | <ul style="list-style-type: none"> ➤ current and future household, C&I, CD&E and hazardous waste arisings in south London over the plan period (tpa) ➤ number, site area (ha) and capacity (tpa) of new and existing waste management facilities within south London by facility type and waste stream. ➤ combined tonnage of household and C&I waste managed within south London as a proportion of total arisings and the London Plan apportionment (tpa) (%) ➤ tonnage of other waste streams managed as a proportion of arisings, including CD&E and hazardous waste (%). ➤ number of allocated and windfall sites developed for new waste management facilities, intensification of uses or for manufacturing from waste respectively (ha) ➤ tonnage of recyclable waste exported outside area (tpa) | Section 7, Page 91 |
| <p>Objective 2: Spatial strategy and strategic approach</p> <p>To optimise and intensify the capacity of new and existing waste management sites in order to make the most efficient use of available industrial land</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal help to optimise and intensify the capacity of waste management sites and other industrial uses within south London compared to reasonable alternatives?</i> ➤ <i>Will the policy or proposal facilitate linked trips and optimise the location of new waste facilities with respect to proximity to strategic routes, sustainable modes of transport, physical and environmental constraints, residential areas and other sensitive receptors?</i> ➤ <i>Will the policy or proposal optimise the distribution of waste management sites within south London?</i> | <ul style="list-style-type: none"> ➤ number of sites and area of employment land intensified for waste management uses, complementary uses such as manufacturing from waste or other industrial uses (ha) ➤ increased tonnage of waste managed on intensified waste sites by waste stream (LACW, C&I and CD&E) & total (tpa) ➤ number and area of existing waste transfer sites converted to waste management operations (ha) ➤ proximity (m) of new or upgraded sites to strategic routes, sustainable modes of transport, physical/ environmental constraints, residential areas and other sensitive receptors | Section 7, Page 92 |

⁶⁹ the apportionment set out in draft London Plan 2019 (887,000 tpa by 2021; 901,250 tpa by 2026; 915,500 by 2031 & 929,750 by 2036)

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|--|--|--|---------------------------|
| <p>Objective 3: Waste re-use, recycling and recovery To drive waste management up the waste hierarchy by promoting re-use, recycling and recovery</p> | <p>➤ <i>Will the policy or proposal help to deliver a shift away from waste disposal towards practices towards the top of the government's waste hierarchy?</i></p> <p>(i) <i>Prevention;</i> (ii) <i>Preparing for Re-Use;</i> (iii) <i>Recycling;</i> (iv) <i>Recovery;</i> (v) <i>Disposal.</i></p>  | <p>➤ tonnage and proportion of south London's waste arisings respectively prepared for re-use, recycled or recovered by waste stream (tpa) (%)</p> <p>➤ number and proportion of waste developments achieving a shift away from waste disposal towards practices towards the top of the government's waste hierarchy</p> <p>➤ tonnage and proportion of biodegradable or recyclable waste sent to landfill (tpa) (%)</p> <p>➤ tonnage and proportion of household and C&I waste recycled (tpa) (%)</p> <p>➤ tonnage and proportion of CD&E waste re-used, recycled or recovered (tpa) (%)</p> <p>➤ proportion of excavation waste put to beneficial uses (%)</p> <p>➤ performance against the following revised targets for re-use, recycling and recovery in the new London Plan</p> <ul style="list-style-type: none"> - the equivalent of 100% of south London's waste is managed within the plan area by 2026 for all waste streams except excavation waste; - zero biodegradable or recyclable waste to landfill by 2026; - at least 65% recycling of municipal waste by 2030; - 95% reuse/recycling/recovery of construction and demolition waste; and - 95% beneficial use of excavation waste | <p>Section 7, Page 93</p> |

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|---|--|---|--------------------|
| <p>Objective 4: Circular economy To promote a transition to a circular economy within south London</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal promote the circular economy within south London?</i> ➤ <i>Will the policy or proposal improve efficiency and innovation to keep products and materials at their highest use for as long as possible?</i> ➤ <i>Will the policy or proposal support manufacturing from waste and the co-location of complementary uses in industrial areas e.g secondary material processing?</i> ➤ <i>Will the policy or proposal promote technologies that produce fuels that can be used to power waste management and industrial processes?</i> | <ul style="list-style-type: none"> ➤ number and proportion of planning applications for waste management facilities supported by a Circular Economy Statement ➤ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➤ number and capacity of manufacturing from waste facilities developed within south London (tpa) ➤ number and capacity of waste facilities developed producing fuels that can be used to power waste management and industrial processes (tpa) | Section 7, Page 94 |
| (B) CLIMATE CHANGE | | | |
| <p>Objective 5: Climate Change Mitigation To address the causes of climate change by minimising CO₂ emissions from waste facilities</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal minimise regulated and unregulated CO₂ emissions from the operation of waste management facilities and ancillary buildings?</i> ➤ <i>Will the policy or proposal minimise embodied energy and the 'carbon footprint' associated with construction materials used for new or upgraded waste facilities?</i> ➤ <i>Will the policy or proposal promote technologies producing fuels that can be used to power waste management and industrial processes?</i> | <ul style="list-style-type: none"> ➤ net carbon dioxide (CO₂) reductions delivered by waste management facilities and ancillary buildings (tpa) ➤ number and proportion of waste facilities (a) achieving BREEAM 'Excellent'; and (b) minimising embodied energy under the BRE's Building life cycle assessment' methodology ➤ number and proportion of waste facilities achieving an 'Excellent' rating under the BRE's 'CEQUAAL' accreditation scheme. ➤ number and capacity of waste management facilities producing fuels that can be used to power waste management and industrial processes? | Section 7, Page 94 |

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|--|---|---|---------------------------|
| <p>Objective 6: Climate Change Adaptation To ensure that all waste management facilities are fully adapted to the impacts of climate change</p> | <p>➤ <i>Will the policy or proposal help to ensure that new or upgraded waste management facilities incorporate green infrastructure and maximise its benefits for flood risk management, urban cooling, resilience to drought, biodiversity and other climate adaptation objectives?</i></p> | <p>➤ number and proportion of new or upgraded waste management facilities achieving the Mayor's minimum Urban Greening Factor (UGF)⁷⁰ score of 0.3 according to Policy G5 and Table 8.2 of the draft new London Plan.</p> <p>➤ proportion of new or upgraded waste management facilities incorporating a green roof and achieving at least a 10% increase in green coverage compared to baseline conditions prior to development.</p> <p>➤ number and proportion of new or upgraded waste management facilities complying with the Mayor's sustainable design and construction SPG as amended.</p> | <p>Section 7, Page 95</p> |
| <p>Objective 7: Flood risk and sustainable drainage (SuDS) To avoid, reduce and manage flood risk to or from waste management facilities</p> | <p>➤ <i>Will the policy or proposal help to avoid inappropriate development in flood risk areas?</i></p> <p>➤ <i>Will the policy or proposal ensure that the design and layout of the waste management sites preserves the ecological functioning of river corridors, enhance local amenity and avoid any net loss of floodplain storage?</i></p> <p>➤ <i>Will the policy or proposal minimise surface water run-off from new waste management facilities by incorporating sustainable urban drainage systems (SUDS), managing run-off as close to its source as possible and aiming to achieve greenfield run-off rates?</i></p> | <p>➤ number and proportion of new or upgraded waste management facilities located within Environment Agency (EA) flood zones 2, 3a and 3b.</p> <p>➤ number and proportion of new or upgraded waste management facilities located within areas at higher risk of surface water flooding according to the EA's 'Risk of Flooding from Surface Water (RoFSW)' map.</p> <p>➤ number and proportion of new or upgraded waste management facilities incorporating SuDS measures.</p> <p>➤ number and proportion of new or upgraded waste management facilities achieving greenfield run-off rates⁷¹</p> <p>➤ number and proportion of new or upgraded waste management facilities incorporating flood resistance or resilience measures in line with Government guidance and EA Standing Advice.</p> | <p>Section 7, Page 95</p> |

⁷⁰ alternatively the London Borough of Sutton's green space factor (GSF) in Local Plan Policy 33 can be used i.e. 'the number and proportion of new or upgraded waste management facilities achieving an increased green space factor (GSF) score of 0.2

⁷¹ for all flood events up to and including the 1 in 100 year event (including 35% for climate change)

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|---|--|--|--------------------|
| Objective 8: Sustainable Design and Construction To promote the highest standards of sustainable design and construction in new waste management facilities | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal help to promote the highest standards of sustainable design and construction in new waste management facilities?</i> ➤ <i>Will the policy or proposal help to minimise environmental life cycle impacts by requiring developers to conduct Life Cycle Assessments as part of the design process</i> ➤ <i>Will the policy or proposal promote the use of responsibly sourced construction materials⁷² with lower environmental impact?</i> | <ul style="list-style-type: none"> ➤ number and proportion of new or upgraded waste facilities achieving BREEAM 'Excellent'⁷³ ➤ number and proportion of waste facilities achieving an 'Excellent' rating under the BRE's 'CEQUAAL' scheme. ➤ number and proportion of new or upgraded waste management facilities subjected to Life Cycle Assessment as part of the design process? ➤ number and proportion of new or upgraded waste facilities promoting the use of responsibly sourced construction materials with lower environmental impact | Section 7, Page 96 |
| (C) ENVIRONMENTAL QUALITY | | | |
| Objective 9: Transport To reduce trips, traffic congestion and pollution arising from waste-related transport movements | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal help to minimise trips, traffic congestion and pollution arising from waste-related transport movements?</i> ➤ <i>Will the policy or proposal minimise the adverse impacts of waste-related transport movements on local roads by safeguarding and locating new waste management facilities close to the strategic road network?</i> ➤ <i>number of new or upgraded waste management facilities located in close proximity to sensitive receptors (i.e. within 400m).</i> | <ul style="list-style-type: none"> ➤ <i>traffic flows on the strategic road network and local roads by vehicle type based on Department for Transport (DfT) and Transport for London (TfL) data (vehicle-km per annum)</i> ➤ <i>number of new or upgraded waste management facilities located in close proximity to the strategic road network (i.e. within 400m)</i> ➤ <i>number of new or upgraded waste management facilities located in close proximity to sensitive receptors (i.e. within 400m)</i> ➤ <i>number of waste sites intensified thus avoiding the need for new sites to developed and associated trips</i> ➤ <i>number and capacity of complementary uses introduced on waste sites, such as manufacturing from waste, with potential to enable 'linked trips'</i> | Section 7, Page 96 |

⁷² for example through requiring submission of Environmental Product Declarations (EPD)

⁷³ the appropriate scheme is currently the BREEAM New Construction 2018

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|---|---|--|--------------------|
| <p>Objective 10: Air Quality To minimise air pollution and impacts on sensitive land-uses arising from waste facilities</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal contribute towards meeting national air quality objectives for nitrogen dioxide (NO₂), particulates (PM₁₀) and ozone and avoid any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'?</i> ➤ <i>Will the policy or proposal help to promote measures such as green infrastructure and screening, in order to prevent or minimise increased exposure to air pollution?</i> | <ul style="list-style-type: none"> ➤ NO₂ (nitrogen dioxide) levels in µg/m³ (Target: 200 µg/m³ as a 1-hour mean no more than 18 days per year) ➤ PM₁₀⁷⁴ levels in µg/m³ (Target: 50 µg/m³ as a 24-hr mean no more than 35 days/year; not to exceed 40 µg/m³ as annual mean) ➤ ozone levels in µg/m³ as an 8-hour mean (Target: No more than 100 µg/m³ as an 8 hour mean > 10 x a year) ➤ number and proportion of new or upgraded waste management developments located within AQMAs or within Air Quality Focus Areas ➤ the number and proportion of new or upgraded waste management facilities achieving 'Air Quality Neutral' standards as defined by the Mayor⁷⁵ | Section 7, Page 97 |
| <p>Objective 11: Environmental protection To minimise the adverse impacts of noise, vibration, dust, light, soil contamination and water pollution during both the construction and operational phases</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal help to minimise the potentially adverse impacts of waste management facilities on noise pollution, vibration, odour and dust on nearby sensitive land-uses during both the construction and operational phases of new or upgraded waste management facilities?</i> ➤ <i>Will the policy or proposal help to minimise water pollution from surface water runoff?</i> ➤ <i>Will the policy or proposal help to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment?</i> | <ul style="list-style-type: none"> ➤ the number and proportion of new or upgraded waste management facilities located adjacent to residential uses and other sensitive land-uses ➤ the number and proportion of new or upgraded waste management facilities which are enclosed or screened ➤ new or upgraded waste facilities accompanied by Construction Environmental Management Plans ➤ the number of new or upgraded waste management facilities incorporating the principles of 'water sensitive urban design' as part of the site drainage/SuDS strategy ➤ the number and area of contaminated industrial sites remediated as a consequence of the development of new or upgraded waste management facilities (ha) | Section 7, Page 98 |

⁷⁴ PM₁₀s = particulate matter less than 10 microns in size

⁷⁵ 'air quality neutral' standards are defined in the Mayor's supplementary planning guidance (SPG) on Sustainable design and Construction (GLA, 2014)

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|--|--|---|-------------------------------|
| <p>Objective 12: Biodiversity and Habitats To protect and enhance biodiversity, habitats and green corridors within the plan area and avoid potentially significant impacts upon nearby 'European sites' covered by the EU Habitats Directive</p> | <ul style="list-style-type: none"> ➤ <i>Is the policy or proposal likely to have a 'significant' effect upon the protection or integrity of a 'European site' as defined in the EU Habitats Directive and the UK Habitats Regulations 2010 - including any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)?</i> ➤ <i>Will the policy or proposal help to minimise any potential impacts upon regionally or locally designated wildlife sites within the plan area?</i> ➤ <i>Will the policy or proposal ensure that there is no net loss in biodiversity value and incorporate opportunities to enhance biodiversity wherever possible as part of the development of new or upgraded waste management facilities?</i> | <ul style="list-style-type: none"> ➤ modelled increase in air pollution arising from the operation of new and existing waste management facilities in south London, associated transport movements and potential adverse impacts on sensitive habitats or species on relevant European sites⁷⁶: <ul style="list-style-type: none"> - Richmond Park SAC; - Wimbledon Common SAC; - Mole Gap to Reigate Escarpment SAC; and - Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA). ➤ the number of new or upgraded waste management facilities located within or adjacent to regionally or locally designated wildlife sites, including Sites of Interest for Nature Conservation (SINCs), local nature reserves (LNRs); and green corridors ➤ change in biodiversity value arising from the development of new or upgraded waste management facilities based on an appropriate metric such as the DEFRA biodiversity offsetting metric⁷⁷ ➤ change in priority habitats and population of Biodiversity Action Plan (BAP) species within each of the four boroughs | <p>Section 7, Page 98</p> |

⁷⁶ the potential significance of any likely adverse effects on European sites arising from the new South London Waste Plan (SLWP) will be considered in the Habitats Regulations Assessment (HRA) Screening Report which will be produced for public consultation at the issues and options stage in October 2019

⁷⁷ further details of DEFRA's biodiversity offsetting metric is available on the GOV.UK website at <https://www.gov.uk/government/collections/biodiversity-offsetting>

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|--|--|---|--------------------|
| (D) ENVIRONMENTAL QUALITY | | | |
| <p>Objective 13: Local Economy and Employment To promote local employment opportunities, and the competitiveness of the waste management sector within South London</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal promote investment, local employment opportunities and the competitiveness of the waste management sector?</i> ➤ <i>Will the policy or proposal contribute to the growth of the circular economy within south London?</i> ➤ <i>Will the policy or proposal help to ensure that employment land supply matches projected demand over the plan period in each of the four partner boroughs and for the plan area as a whole?</i> ➤ <i>Will the policy or proposal help to maintain a sufficient supply of land and premises to meet current and future demands for industrial uses within the four south London boroughs and across the wider Wandle Valley Property Market Area ⁷⁸</i> ➤ <i>Will the policy or proposal help to that sufficient volumes of recyclable materials are generated to make domestic manufacturing from waste viable?</i> | <ul style="list-style-type: none"> ➤ number of people employed in the Circular Economy within south London and by borough ➤ number of green businesses by size and proportion surviving 1 year ➤ growth in the low carbon and environmental goods and services sector within south London ➤ projected supply and demand for employment land (for non waste-related uses) by borough over the plan period⁷⁹ ➤ vacancy rates within SILs and established industrial areas ➤ number of sites and total area of employment land within SILs and established industrial areas intensified for waste management and/or for other industrial uses ➤ area of employment land optimised for waste management and complementary manufacturing from waste uses ➤ tonnage and proportion of waste prepared for re-use, recycled or recovered by waste stream (tpa) (%) ➤ number and capacity of manufacturing from waste facilities developed within south London (tpa) | Section 7, Page 99 |
| <p>Objective 14: Historic Environment, Townscape and Visual Amenity To avoid the adverse impacts of waste facilities on townscape quality and visual amenity by promoting high standards of design and layout</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal avoid all potential adverse impacts on the quality and distinctiveness of south London's historic environment and cultural assets,</i> ➤ <i>Will the policy or proposal ensure that new or upgraded waste management facilities are built to high quality design principles that respect local character and do not adversely affect townscape?</i> | <ul style="list-style-type: none"> ➤ the number and proportion of new or upgraded waste management facilities constructed to high quality design principles ➤ adverse impacts on the setting of scheduled monuments, historic parks and gardens and other heritage or cultural assets in south London | Section 7, Page 99 |

| SA Objective | Appraisal Questions | Indicators | Issue Ref |
|--|---|--|---------------------|
| <p>Objective 15: Human Health and Quality of Life To minimise the potentially adverse impacts of waste management facilities on human health and protect the open environment</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal protect and enhance local amenity for residents living near new and existing waste management facilities, particularly within areas affected by social deprivation?</i> ➤ <i>Will the policy or proposal help to minimise the impacts of waste facilities and associated transport movements?</i> ➤ <i>Will the policy or proposal help to reduce the incidence of waste-related crime and contribute to public perceptions of safety?</i> ➤ <i>Will the policy or proposal maintain the current level of protection for Green Belt and Metropolitan Open Land (MOL) and public open space</i> | <ul style="list-style-type: none"> ➤ levels of social deprivation in residential areas adjacent to waste management sites and the strategic road network within south London as measures by the Government's Index of Multiple Deprivation (IMD) and the relevant domains relating to employment, health, crime and living environment ➤ monitored levels of nitrogen dioxide (NO₂), particulates (PM10) and ozone against national air quality objectives ➤ levels of 'health and disability' deprivation in residential areas adjacent to waste management sites (see above) ➤ environmental crime rate per 1,000 population ➤ area of Green Belt, MOL and public open space and area lost to waste management development | Section 7, Page 100 |
| <p>Objective 16: Equalities, Accessibility and Social Inclusion To reduce exclusion, address inequalities & accessibility for all equalities target groups</p> | <ul style="list-style-type: none"> ➤ <i>Will the policy or proposal ensure that new waste management facilities are accessible and inclusive for all equalities target groups?</i> ➤ <i>Will the policy or proposal further promote social inclusion by addressing potential inequalities arising from current waste management arrangements in south London?</i> ➤ <i>Will the plan preparation process increase the overall extent of ongoing public involvement in the waste planning process in south London?</i> ➤ <i>Will the policy or proposal maximize potential benefits to local communities in the form of new products and employment by managing more waste locally, optimising existing waste facilities and building new reuse and recovery facilities?</i> | <ul style="list-style-type: none"> ➤ new or upgraded waste management facilities within south London are accessible and inclusive for all equalities target groups ➤ number and location of reuse and recycling centres within south London accepting household waste ➤ proportion of the urban area within south London within 2 km of reuse and recycling centres ➤ location and concentration of existing and new waste facilities relative to areas of relative social deprivation ➤ number of individuals, residents' groups, special interest groups, business organisations, public bodies and neighbouring waste planning authorities consulted as part of the preparation of the new plan | Section 7, Page 101 |

⁷⁸ the Wandle Valley Property Market Area includes Wandsworth as well as Croydon, Kingston,, Merton and Sutton

⁷⁹ based on the London Industrial Land Demand Study, prepared by CAG Consultants on behalf of the Mayor in 2017'

9. Identifying and Appraising Waste Sites

Review of existing waste management capacity⁸⁰

9.1 As part of the evidence base for the new South London Waste Plan (SLWP), Anthesis consultants undertook an assessment of existing waste sites across the four boroughs in order to review what available waste management capacity may be considered to contribute towards the updated London Plan apportionment targets. Using the relevant apportionment criteria set out in the London Plan, the capacity review included the following types of waste management facility:

- **Used in London for energy recovery:** Energy recovery facility, energy from waste facility, anaerobic digestion;
- **Materials sorted or bulked in London facilities for reuse, reprocessing or recycling:** Materials Recycling Facility (MRF) or other materials sorting facility, transfer stations;
- **Material reused, recycled or reprocessed in London:** Material reprocessor, reuse facility, composting facility (permitted and exempt), anaerobic digestion facility; and
- **Produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition⁸¹ as a minimum:** RDF or SRF production facilities (if Renewable Obligation Order requirements are met).

9.2 Existing waste transfer stations where collected wastes are bulked before transporting to other facilities, such as landfilling, energy recovery or separation for recycling were not counted towards the apportionment unless prior separation takes place.

9.3 Details of the review are set out in the South London Waste Technical Paper (Anthesis, 2019) in terms of:

- existing waste management capacity for all sites which are currently contributing towards the London Plan 2016 apportionment;
- potential capacity gaps to 2036;
- waste management facilities in the planning pipeline;
- vacant sites which could be redeveloped for waste management uses; and
- opportunities for intensification.

9.4 The main conclusion reached by the consultants was that the waste sites identified as suitable for intensification and development represent sufficient opportunity to meet the capacity gaps for household, C&I and C&D waste streams. If all potential new capacity identified were to be brought forward, there would be surplus capacity for the management of household, C&I and C&D waste streams throughout the plan period to 2036. Although this surplus is forecast to decrease over the plan period, there is considered to be some flexibility in bringing the identified capacity forward. As sufficient opportunities can be identified to meet the capacity gap for household, C&I (apportioned waste) and C&D waste streams, it was therefore not considered necessary for the updated SLWP to identify any new areas for new waste facilities within the four boroughs.

⁸⁰ see also Section 3 of this SA Report

⁸¹ refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns. The written contract must include the end-user's technical specifications.

Identifying sites for appraisal

9.5 Paragraph 4 of the NPPW states that:

"Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages."

9.6 In addition, 2020 London Plan Policy SI 8 states that:

"Development Plan should identify the following as suitable locations to manage borough waste apportionments:

(a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity;

(b) Strategic Industrial Locations and Locally Significant Industrial Sites;

(c) safeguarded wharves with an existing or future potential for waste and secondary material management."

9.7 The sites included in the appraisal therefore consist of all of the existing waste treatment sites within the four Boroughs together with all of the Strategic Industrial Locations (SILs) and locally significant industrial locations (LSILs) across the plan area. It also includes Site C4: Days Aggregates site, which utilises the Purley railhead. The Chessington railhead has not been included as the operators have informed officers that the site will not be used for waste management purposes and so would fail the availability strand of the developability test (see below).

Initial site profiling (undertaken by Anthesis consultants)

9.8 As part of the evidence base, the consultants prepared initial site profiles for all existing waste management sites including address details, location maps, operator, type of facility, maximum throughput, licensed capacity, type of waste accepted, management type (by reference to the waste hierarchy), nature and scale of the facility, planning constraints and opportunities for intensification or upgrading existing operations. The results of initial site profiling undertaken by the consultants in early 2019 are set out Appendix 4 of the Technical Paper.

9.9 The following site assessment criteria and planning constraints can be directly related to one or more of the sustainability objectives making up the finalised SA Framework in Section 8: type of facility, throughput and licensed capacity:

- management type;
- access, congestion and road capacity;
- opportunity to use rail;
- cumulative impact of existing and proposed waste disposal facilities on community well-being;
- opportunity to intensify or upgrade;
- other designations;
- air quality focus area;
- green belt / MOL;
- flood risk;
- heritage assets; and
- proximity to environment designations

Site appraisal methodology

9.10 Following the preparation of the Technical Paper by Anthesis consultants, the four partner Boroughs carried out further detailed site appraisal work for all potential sites within the plan area in order to identify a range of suitable, developable waste sites for inclusion in the new SLWP. The methodology used was closely based on policy and guidance set out in the National Planning Policy Framework (NPPF), the National Planning Policy for Waste (NPPW) and the 2020 London Plan.

9.11 The NPPF's approach to site appraisal is based on the following three elements which determine whether a site is considered to be 'developable':

- (i) suitability – the site is appropriate in terms of planning policy and associated designations;
- (ii) availability – the site has no land ownership constraints;
- (iii) viability – the site could be considered financial viable to develop.

Suitability

9.12 The suitability criteria used for the purpose of appraising potential waste sites are set out below in Table 9.1 together with the scoring system. These are derived from the criteria set out in Appendix B of the NPPW but incorporating amendments to reflect the context of the plan area.

9.13 Some of the potential waste sites are quite large and so are surrounded by a lot of different use and this creates a bias against large sites where proximity criteria are involved. Consequently, large sites are only marked down for proximity or being adjacent to sensitive receptors where the land use has a significant boundary with the site

9.14 The maximum suitability score for any particular site is 50.

Table 9.1 Site Suitability Criteria and Scoring

| Suitability Criterion Used | Scoring System | Relevant NPPF Definition |
|---|---|---|
| Water quality (SPZ) | 5 - Not in SPZ ⁸² or in SPZ3 3 - In SPZ2 1 - In SPZ1 | (1) water quality |
| Flood risk management (Flood) | 5 - Flood Zone 1 3 - Flood Zone 2 1 - Flood Zone 3 | (aii) flood risk management |
| Metropolitan Open Land and Green Belt (MOL/GB) | 5 - Not adjacent to MOL/Green Belt 3 - Adjacent to MOL/Green Belt 1 - In MOL/Green Belt | (c) visual impacts |
| Site of Interest for Nature Conservation (SINC) | 5 - Not adjacent to a SINC 3 - Adjacent to a SINC 1 - Within a SINC | (d) nature conservation |
| Conservation Area or Scheduled Ancient Monument (CA/SAM) | 5 - Not adjacent to a CA or SAM 3 - Adjacent to a CA or SAM 1 - Within a CA | (e) historic environment |
| Strategic Road Network (SRN) | 5 - Direct access to Strategic Road Network 3 - Access to Strategic Road Network without going through residential areas 1 - Access to Strategic Road Network going through residential areas | (f) traffic and access |
| Sustainable Transport (Sus Trans) | 5 - Access to a sustainable transport network 1 - No access to sustainable transport network | (fii) traffic and access |
| Sensitive Receptors (Sens Rec) | 15 - Not adjacent to sensitive receptors (residential, schools, hospitals) 7 - Adjacent to sensitive receptors (residential, schools, hospitals) | (g) air emissions (h) odours (i) vermin and birds; (j) noise, light & vibration; (k) litter (l) land use conflict |
| SUITABILITY SCORE MAXIMUM | 50 | |

⁸² Source Protection Zone

Availability and Viability

9.15 The scoring system used for appraising site availability and viability is set out below in Table 9.2. The maximum respective scores for each of these criteria is 25, making 50 in total.

9.16 An existing operational waste site scores highly because its very existence is considered to provide availability and viability. Large industrial areas which already include existing waste facilities score more highly than those which do not include existing waste facilities. The rationale for this is to reflect the fact that industrial land values vary across the plan area and those estates which are lower in value tend to have waste facilities which are more marginal in terms of profitability. This is considered to be a more reliable indicator of viability and availability than a notional viability assessments.

Table 9.2 Site Availability and Viability Criteria

| Suitability Criterion Used | Scoring System |
|-----------------------------------|--|
| Availability | 25 - Existing site 15 - Existing sites within or nearby 5 - No existing sites within or nearby |
| AVAILABILITY SCORE MAXIMUM | 25 |
| Viability | 25 - Existing site 15 - Existing sites within or nearby 5 - No existing site within or nearby |
| VIABILITY SCORE MAXIMUM | 25 |
| Total combined score | 50 |

Overall site appraisal score

9.17 For each site appraised, a total score out of 100 was obtained by adding the sub-totals for site suitability (50), availability (25) and viability (25).

Results of site appraisal

9.18 The results of appraisal for all potential waste sites considered throughout the plan review process are set out in Table 9.3 below. Existing waste management sites within south London which are proposed to be carried forward and safeguarded in the draft SLWP (Submission Version) are shaded in green.

9.19 The results indicate that these sites are the most developable sites across the plan area since they score highly not only in terms of not only availability and viability, but also in terms of suitability. Furthermore, they score highly even though the site appraisal gives less weight to availability and viability and that the site appraisal does not take into account any mitigation measures for suitability that may have imposed by way of conditions when the existing sites were granted planning permission.

Table 9.3 Results of Site Appraisal

| SITE | Type | Area (ha) | SPZ | Flood | MOL/GB | SINC | CA/SAM | SRN | Sus Trans | Sens Rec | Suitability Total | Availability | Viability | TOTAL SCORE | Notes |
|--------------------------------|----------|-----------|-----|-------|--------|------|--------|-----|-----------|----------|-------------------|--------------|-----------|-------------|------------------------------|
| CROYDON SITES | | | | | | | | | | | | | | | |
| C1:Able Waste Services | Existing | 0.45 | 1 | 5 | 3 | 3 | 5 | 3 | 1 | 15 | 36 | 25 | 25 | 86 | Proposed |
| C4:Days Aggregates | Existing | 2.0 | 1 | 5 | 5 | 5 | 5 | 3 | 5 | 7 | 36 | 25 | 25 | 86 | Proposed |
| C5A:Factory Lane Trans Station | Existing | 1.4 | 5 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| C5B:Factory Lane R&R Centre | Existing | 0.3 | 5 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| C6:Fishers Farm R&R Centre | Existing | 0.2 | 3 | 5 | 3 | 3 | 5 | 1 | 1 | 7 | 28 | 25 | 25 | 78 | Proposed |
| C7:Henry Woods Waste Mgmt | Existing | 0.7 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| C8:New Era Metals | Existing | 0.4 | 1 | 5 | 5 | 5 | 5 | 5 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| C9:Pear Tree Farm | Existing | 1.8 | 1 | 5 | 1 | 3 | 5 | 1 | 1 | 15 | 32 | 25 | 25 | 82 | Proposed |
| C10:Purley Oaks R&R Centre | Existing | 0.2 | 1 | 1 | 5 | 5 | 5 | 5 | 1 | 7 | 30 | 25 | 25 | 80 | Proposed |
| C11:SafetyKleen | Existing | 0.3 | 1 | 5 | 5 | 3 | 5 | 5 | 1 | 15 | 40 | 25 | 25 | 90 | Proposed |
| C12:Stubbs Mead Depot | Existing | 2.7 | 5 | 3 | 5 | 3 | 5 | 5 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| C13: Solo Wood Recycling | Existing | 0.1 | 5 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed ⁸³ |
| C2:Croydon Car Spares | Existing | 0.05 | 5 | 5 | 3 | 3 | 5 | 1 | 1 | 7 | 30 | 5 | 5 | 40 | Site deleted following I&POs |
| C3:Curley Skip Hire | Existing | 0.05 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site deleted following I&POs |
| Marlpit Lane | SIL | 20 | 1 | 5 | 5 | 1 | 5 | 5 | 5 | 15 | 42 | 15 | 15 | 72 | Site excluded |
| Purley Way North (3 parts) | SIL | 71.4 | 5 | 3 | 5 | 5 | 5 | 5 | 1 | 15 | 44 | 5 | 5 | 54 | Site excluded |
| Purley Way South (2 parts) | SIL | 33.3. | 1 | 5 | 3 | 3 | 5 | 5 | 1 | 15 | 38 | 15 | 15 | 68 | Site excluded |
| Gloucester Road East | LSIL | 2.6 | 5 | 5 | 5 | 3 | 5 | 1 | 5 | 15 | 44 | 5 | 5 | 54 | Site excluded |
| Gloucester Road West | LSIL | 1.5 | 5 | 5 | 5 | 5 | 5 | 1 | 5 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Selsdon Road (two parts) | LSIL | 6.7 | 5 | 5 | 5 | 3 | 5 | 1 | 5 | 7 | 36 | 5 | 5 | 46 | Site excluded |
| Thornton Road | LSIL | 4.7 | 5 | 5 | 5 | 5 | 5 | 5 | 1 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Union Road | LSIL | 3.3 | 5 | 5 | 5 | 5 | 5 | 5 | 1 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Vulcan Way | LSIL | 9.1 | 3 | 5 | 3 | 3 | 5 | 1 | 1 | 7 | 28 | 5 | 5 | 38 | Site excluded |

⁸³ site introduced following the issues and preferred options stage

| SITE | Type | Area (ha) | SPZ | Flood | MOL/GB | SINC | CA/SAM | SRN | Sus Trans | Sens Rec | Suitability Total | Availability | Viability | TOTAL SCORE | Notes |
|--------------------------------------|----------|-----------|-----|-------|--------|------|--------|-----|-----------|----------|-------------------|--------------|-----------|-------------|--|
| KINGSTON SITES | | | | | | | | | | | | | | | |
| K2: Genuine Solutions | Existing | 0.3 | 5 | 5 | 5 | 5 | 5 | 5 | 1 | 15 | 46 | 25 | 25 | 96 | Proposed |
| K3: Kingston R&R Centre | Existing | 0.4 | 5 | 5 | 3 | 3 | 5 | 1 | 1 | 15 | 38 | 25 | 25 | 88 | Proposed |
| K4: Kingston Waste Transfer Station | Existing | 1.6 | 5 | 5 | 3 | 3 | 5 | 1 | 1 | 15 | 38 | 25 | 25 | 88 | Proposed |
| K1: Chessington Equestrian Centre | Existing | 9.9 | 5 | 5 | 1 | 5 | 5 | 5 | 1 | 15 | 42 | 5 | 5 | 52 | Site deleted ⁸⁴ following I&POs |
| Barwell Business Park | SIL | - | 5 | 5 | 3 | 5 | 5 | 5 | 5 | 15 | 48 | 5 | 5 | 58 | Site excluded |
| Chessington Industrial Estate | SIL | - | 5 | 5 | 3 | 3 | 5 | 3 | 5 | 7 | 36 | 15 | 15 | 66 | Site excluded |
| Cambridge Road/Hampden Road | LSIL | - | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Canbury Park | LSIL | - | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Fairfield Trade Pk/ Kingsmill Bus Pk | LSIL | - | 5 | 3 | 5 | 3 | 5 | 1 | 1 | 7 | 30 | 15 | 15 | 60 | Site excluded |
| London Road | LSIL | - | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Red Lion Industrial Estate | LSIL | - | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| St George's Industrial Estate | LSIL | - | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| St John's Industrial Estate | LSIL | - | 5 | 5 | 5 | 5 | 5 | 1 | 5 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Silverglade Business Park | LSIL | - | 5 | 5 | 1 | 5 | 5 | 5 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| MERTON SITES | | | | | | | | | | | | | | | |
| M1: B&T@Work | Existing | 0.06 | 5 | 5 | 5 | 5 | 5 | 3 | 1 | 15 | 44 | 25 | 25 | 94 | Proposed |
| M2: European Metal Recycling | Existing | 1.0 | 1 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 38 | 25 | 25 | 88 | Proposed |
| M3: Deadman Confidential | Existing | 0.4 | 1 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 38 | 25 | 25 | 88 | Proposed |
| M4: Garth Road R&R Centre | Existing | 0.7 | 3 | 5 | 5 | 5 | 5 | 1 | 5 | 7 | 36 | 25 | 25 | 86 | Proposed |
| M5: Garth Road Transfer Stat | Existing | 0.45 | 3 | 5 | 5 | 5 | 5 | 1 | 5 | 7 | 36 | 25 | 25 | 86 | Proposed |
| M6: George Killoughery Ltd | Existing | 0.8 | 1 | 3 | 3 | 3 | 3 | 3 | 1 | 15 | 32 | 25 | 25 | 82 | Proposed |
| M7: LMD (Abbey Ind Est) | Existing | 0.06 | 5 | 5 | 5 | 5 | 5 | 3 | 1 | 15 | 44 | 25 | 25 | 94 | Proposed |

⁸⁴ this site has has been deleted following the issues and preferred options stage since it is in temporary use

| SITE | Type | Area (ha) | SPZ | Flood | MOL/GB | SINC | CA/SAM | SRN | Sus Trans | Sens Rec | Suitability Total | Availa-bility | Viab-ility | TOTAL SCORE | Notes |
|----------------------------------|----------|-----------|-----|-------|--------|------|--------|-----|-----------|----------|-------------------|---------------|------------|-------------|---------------|
| M8: LMD Waste (Willow Lane) | Existing | 0.07 | 1 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 38 | 25 | 25 | 88 | Proposed |
| M9: Maguire Skips | Existing | 0.2 | 5 | 5 | 5 | 3 | 5 | 3 | 1 | 7 | 34 | 25 | 25 | 84 | Proposed |
| M10: Powerday | Existing | 0.3 | 5 | 3 | 3 | 3 | 5 | 3 | 5 | 15 | 42 | 25 | 25 | 92 | Proposed |
| M11: Morden Transfer Station | Existing | 0.8 | 3 | 5 | 3 | 5 | 5 | 1 | 5 | 7 | 34 | 25 | 25 | 84 | Proposed |
| M12: NJB Recycling | Existing | 0.3 | 5 | 5 | 3 | 3 | 5 | 3 | 5 | 7 | 36 | 25 | 25 | 86 | Proposed |
| M13: One Waste Clearance | Existing | 0.1 | 5 | 5 | 5 | 5 | 5 | 3 | 1 | 15 | 44 | 25 | 25 | 94 | Proposed |
| M14: Reston Waste | Existing | 0.43 | 5 | 5 | 3 | 3 | 5 | 3 | 5 | 7 | 36 | 25 | 25 | 86 | Proposed |
| M15: Riverside AD Facility | Existing | 0.5 | 1 | 3 | 3 | 3 | 3 | 3 | 1 | 15 | 32 | 25 | 25 | 82 | Proposed |
| M16: Riverside Bio-Treatment | Existing | 0.4 | 1 | 3 | 3 | 3 | 3 | 3 | 1 | 15 | 32 | 25 | 25 | 82 | Proposed |
| M17: UK & European (Ranns) | Existing | 0.5 | 1 | 3 | 5 | 5 | 5 | 3 | 1 | 15 | 38 | 25 | 25 | 88 | Proposed |
| M18: Wandle Waste Man | Existing | 0.07 | 5 | 5 | 5 | 5 | 5 | 3 | 1 | 15 | 44 | 25 | 25 | 94 | Proposed |
| Durnsford Road B | SIL | 18.5 | 5 | 5 | 3 | 3 | 5 | 5 | 5 | 7 | 38 | 15 | 15 | 68 | Site excluded |
| Hallowfield Way | SIL | 7.9 | 5 | 5 | 5 | 3 | 3 | 5 | 5 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Plough Road | SIL | 13.8 | 5 | 1 | 3 | 3 | 1 | 3 | 5 | 7 | 28 | 15 | 15 | 58 | Site excluded |
| Prince George's Road | SIL | 6.2 | 1 | 3 | 5 | 3 | 5 | 5 | 5 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Sth Wimbledon Bus Pk (Morden Rd) | SIL | 31.7 | 3 | 5 | 3 | 3 | 3 | 5 | 5 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Willow Lane | SIL | 41.3 | 1 | 3 | 3 | 3 | 3 | 1 | 5 | 7 | 28 | 15 | 15 | 58 | Site excluded |
| Bushey Road | LSIL | 3.7 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 7 | 42 | 5 | 5 | 52 | Site excluded |
| Burlington Way (Beverley Way) | LSIL | 7.3 | 5 | 3 | 3 | 3 | 5 | 5 | 5 | 7 | 36 | 5 | 5 | 46 | Site excluded |
| Malden Way (Beverley Way) | LSIL | 0.7 | 5 | 3 | 5 | 3 | 5 | 1 | 5 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Dundonald Road | LSIL | 3.7 | 5 | 5 | 5 | 3 | 5 | 1 | 5 | 7 | 36 | 5 | 5 | 46 | Site excluded |
| Durnsford Road A | LSIL | 2.4 | 5 | 5 | 5 | 3 | 5 | 5 | 5 | 7 | 40 | 5 | 5 | 50 | Site excluded |
| Gap Road | LSIL | 3.8 | 5 | 5 | 5 | 3 | 5 | 3 | 5 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Garth Road | LSIL | 9.4 | 5 | 5 | 5 | 3 | 5 | 1 | 1 | 7 | 32 | 15 | 15 | 62 | Site excluded |
| Nelson Trading Estate | LSIL | 2.3 | 5 | 3 | 5 | 3 | 5 | 5 | 5 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Rainbow Ind Estate (Raynes P) | LSIL | 3.2 | 5 | 5 | 5 | 1 | 5 | 1 | 5 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Streatham Road | LSIL | 5.3 | 5 | 3 | 5 | 5 | 5 | 5 | 5 | 7 | 40 | 5 | 5 | 50 | Site excluded |

| SITE | Type | Area (ha) | SPZ | Flood | MOL/GB | SINC | CA/SAM | SRN | Sus Trans | Sens Rec | Suitability Total | Availa-bility | Viab-ility | TOTAL SCORE | Notes |
|---------------------------------------|----------|-----------|-----|-------|--------|------|--------|-----|-----------|----------|-------------------|---------------|------------|-------------|------------------------|
| SUTTON SITES | | | | | | | | | | | | | | | |
| S1: 777 Recycling Centre | Existing | 1.0 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| S2: Beddington Farmlands ERF | Existing | 5.8 | 5 | 5 | 1 | 1 | 5 | 1 | 1 | 15 | 34 | 25 | 25 | 84 | Proposed |
| S3: Cannon Hygiene | Existing | 0.2 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| S4: Croydon Transfer Station | Existing | 0.7 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| S5: Hinton Skips | Existing | 0.6 | 5 | 3 | 5 | 5 | 5 | 1 | 1 | 15 | 40 | 25 | 25 | 90 | Proposed |
| S6: Hydro Cleaning | Existing | 0.2 | 5 | 5 | 5 | 5 | 5 | 3 | 1 | 15 | 44 | 25 | 25 | 94 | Proposed |
| S7: Kimpton R&R Centre | Existing | 0.4 | 5 | 5 | 3 | 5 | 5 | 5 | 1 | 15 | 44 | 25 | 25 | 94 | Proposed |
| S8: King Concrete | Existing | 0.5 | 5 | 5 | 3 | 3 | 5 | 1 | 1 | 7 | 30 | 25 | 25 | 80 | Proposed |
| S9: Premier Skip Hire | Existing | 0.1 | 5 | 5 | 5 | 5 | 5 | 5 | 1 | 15 | 46 | 25 | 25 | 96 | Proposed |
| S10: Raven Recycling | Existing | 0.3 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 15 | 42 | 25 | 25 | 92 | Proposed |
| S11: TGM Environmental | Existing | 0.2 | 5 | 3 | 5 | 5 | 5 | 1 | 1 | 15 | 40 | 25 | 25 | 90 | Proposed |
| S12: Beddington Lane Recovery | Existing | 2.8 | 5 | 5 | 3 | 1 | 5 | 1 | 1 | 15 | 36 | 25 | 25 | 86 | Proposed ⁸⁵ |
| Beddington Industrial Estate | SIL | 105.8 | 5 | 3 | 3 | 3 | 3 | 1 | 1 | 7 | 26 | 15 | 15 | 56 | Site excluded |
| Imperial Way Industrial Estate | SIL | 18.8 | 1 | 5 | 3 | 5 | 5 | 5 | 1 | 15 | 40 | 5 | 5 | 50 | Site excluded |
| Kimpton Way Industrial Estate | SIL | 5.9 | 5 | 5 | 3 | 3 | 5 | 5 | 1 | 7 | 34 | 15 | 15 | 64 | Site excluded |
| Croydon Industrial Area | LSIL | 0.9 | 5 | 5 | 5 | 5 | 5 | 5 | 1 | 7 | 38 | 5 | 5 | 48 | Site excluded |
| Gander Green Lane/Abbotts Rd | LSIL | 0.7 | 3 | 5 | 5 | 5 | 5 | 5 | 1 | 7 | 36 | 5 | 5 | 46 | Site excluded |
| Hackbridge Industrial Area | LSIL | 1.3 | 1 | 3 | 5 | 5 | 5 | 1 | 5 | 7 | 32 | 5 | 5 | 42 | Site excluded |
| Oldfields Way Industrial Area | LSIL | 0.6 | 5 | 3 | 5 | 3 | 5 | 1 | 1 | 7 | 30 | 5 | 5 | 40 | Site excluded |
| Plumpton Way Industrial Area | LSIL | 1.1 | 5 | 5 | 5 | 5 | 5 | 1 | 1 | 7 | 34 | 5 | 5 | 44 | Site excluded |
| Restmor Way Industrial Area | LSIL | 3.4 | 1 | 3 | 5 | 3 | 5 | 1 | 5 | 7 | 30 | 5 | 5 | 40 | Site excluded |
| Wandle Valley Trading Estate | LSIL | 0.3 | 1 | 1 | 5 | 3 | 5 | 3 | 1 | 7 | 26 | 5 | 5 | 36 | Site excluded |

⁸⁵ site introduced following the issues and preferred options stage

Industrial areas previously identified as suitable for waste facilities but not proposed to be carried forward

9.20 Industrial areas previously identified as 'broad areas' suitable for waste management uses in Schedule 2 of the current SLWP (2012) are listed below in Table 9.4.

Table 9.4: Industrial areas previously identified as suitable but not carried forward

| SLWP Ref | Industrial Area | Significant changes since 2012 |
|-----------------------|--|--|
| CROYDON/SUTTON | | |
| 102 | Purley Way, Lysander Road and Imperial Way Ind. Area | n/a |
| CROYDON | | |
| 99 | Purley Oaks Highways Depot | This area has been allocated as a Gypsy and Traveller site. Therefore, it is no longer suitable for new waste facilities |
| 105 | Factory Lane Industrial Estate | 3.33ha of land within this area has been designated for redevelopment (Proposal Sites 430 and 946). Therefore the area suitable for waste facilities will reduce in size |
| 125 | Factory Lane (South Side) | n/a |
| KINGSTON | | |
| | Chessington Industrial Area | n/a |
| MERTON | | |
| | Durnsford Road Industrial Area | This area has had office buildings converted to residential accommodation under Prior Approval (Vantage House, Weir Road). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of the south of the area for new waste uses. Durnsford Road was identified in the Crossrail 2 consultation in 2015 as the 'proposed site for stabling, depot, shaft and tunnelling works', however Crossrail 2 works are likely to begin beyond the plan period for the new SLWP |
| | Garth Road Industrial Area | This area has had office buildings converted to residential uses under Prior Approval (Enterprise House). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of parts of the Area for waste uses |
| | Willow Lane Industrial Area | This area has had office buildings converted to residential accommodation under Prior Approval (Connect House). The Area is now subject to an Article 4 direction which has removed the permitted development rights, however the residential accommodation already in the middle of the Area will affect the suitability of parts of the Area for waste uses. Willow Lane is a Business Improvement District and is currently subject to a BID vote |
| SUTTON | | |
| | Beddington Ind Area (part) | n/a |
| | Kimpton Industrial Estate (part) | Land north of Minden Road has been redeveloped for other uses. Therefore, it is no longer suitable for new waste facilities |
| | Wandle Valley Trading Estate (part) | This area has been redeveloped for other uses and it is an integral part of the Wandle Valley Trail. Therefore, it is no longer suitable for new waste facilities |

Sustainability appraisal of potential waste sites

9.21 In addition to the above site appraisal work, the potential impacts of each of the existing or potential waste management sites considered throughout the plan review process has been appraised, where relevant, against each of the sustainability objectives making up the finalised SA Framework out in Section 8 of this document. It should be noted that there is a significant overlap between (i) the consultants' initial site assessment criteria and the criteria developed by the four Boroughs for the purpose of assessing site suitability, availability and deliverability; and (ii) the sustainability objectives making up the SA Framework.

9.22 The appraisal results for each of the sites are set out in Section 12.

9.23 In interpreting the outcome of site appraisal it should be noted that:

- for existing waste management sites which are already in operation, it can be assumed that any potential adverse impacts upon the local environment and neighbouring land-uses (arising from both construction and operation) should have been mitigated already at least some extent as part of the planning permission;
- those existing waste management sites which have potential for intensification or redevelopment intrinsically offer additional opportunities for avoiding or minimising adverse effects on upon the local environment and neighbouring land-uses;
- a number of the sustainability criteria within the SA Framework (e.g. 'sustainable design and construction') cannot meaningfully be assessed in relation to specific sites, since the nature and extent of the potential impact will be determined by the effective implementation of the relevant development management policies rather than the location or any other intrinsic characteristic of the site. This is indicated in the matrix through a through a 'neutral' rating.

10. Developing Proposed South London Waste Plan Policies (Task A5)

Developing draft policies for inclusion in the Issues and Preferred Options document (Regulation 18 consultation)

10.1 Based on initial evidence gathering on existing and future waste management capacity in South London against the new London Plan apportionment, specific policy recommendations contained in the Technical Paper (Anthesis, June 2019) and the outcome of the sustainability appraisal (SA) scoping stage, the following draft policies (WP1-WP8) were developed by the partner boroughs as part of the preferred SLWP option to guide proposed waste developments over the plan period from 2021 to 2036:

- Draft Policy WP1: Strategic Approach to Municipal Solid Waste and C&I Waste;
- Draft Policy WP2: Strategic Approach to Other Forms of Waste;
- Draft Policy WP3: Existing Waste Sites;
- Draft Policy WP4: Sites for Compensatory Provision;
- Draft Policy WP5: Protecting and Enhancing Amenity;
- Draft Policy WP6: Sustainable Design and Construction of Waste Facilities;
- Draft Policy WP7: The Benefits of Waste;
- Draft Policy WP8: Planning Obligations.

10.2 The above policies were subsequently put forward in the SLWP Issues and Preferred Options document which was published for public consultation between 31 October and 22 December 2019. The accompanying SA Report concluded that draft Policies WP1-WP8 -which represented the partner boroughs' 'preferred' strategy for the new SLWP (Option 1) – would have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

Developing proposed policies for inclusion in the draft SLWP for submission (Regulation 19 consultation)

10.3 At the close of consultation period, a total of 1,155 representations⁸⁶ had been received from 78 individual consultees. Some of the key waste planning and sustainability issues arising from public consultation are discussed in Section 7 of this SA Report on 'Key Sustainability Issues'.

10.4 A draft version of the SLWP 2021-36 (the draft plan) has now been prepared for submission to the Secretary of State for Housing, Communities and Local Government (DHCLG) prior to Examination-in-Public. While the overall strategic approach to managing South London's future waste arisings to 2036 is essentially unchanged, the draft plan incorporates a number of changes to the waste policies put forward at the issues and preferred options stage in the light of representations received and changing circumstances.

⁸⁶ a complete list of representations to the SLWP Issues and Preferred document and to accompanying SA Report together with officer comments are available at xxxxxx

10.5 The draft plan, which has been published for further public consultation between XX MONTH and YY MONTH (Regulation 19 consultation), now identifies the following 10 strategic and development management policies to guide waste treatment within the four boroughs over the next 15 years.

Strategic Policies

- **WP1 Strategic Approach to Household and Commercial and Industrial Waste:** The policy title has been changed to refer to 'household' waste in place of 'Municipal Solid Waste'; and
- **WP2 Strategic Approach to Other Forms of Waste:** This policy has been amended to reflect the move from a shortfall in C&D waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of Surrey County Council (see Representation C18/144) amongst other South East councils.

Development Management Policies

- **WP3 Existing Waste Sites** (unchanged);
- **WP4 Sites for Compensatory Provision** (unchanged);
- **WP5 Protecting and Enhancing Amenity** (unchanged);
- **WP6 Sustainable Design and Construction of Waste Facilities:** This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that, where appropriate, the sustainability credentials of a waste development can be measured against the BRE's 'CEEQUAL'⁸⁷ scheme in place of the BREAM New Construction scheme;
- **WP7 The Benefits of Waste** (unchanged);
- **WP8 New Development Affecting Waste Sites:** This is a new policy to reflect the requests from SUEZ (see Representation C20/10) and Veolia (see Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy:
- **WP9 Planning Obligations** (unchanged);
- **WP10 Monitoring and Contingencies:** This is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies

10.6 The basis for introducing the above changes can be seen in the consultee comments and the relevant officer responses set out in the Schedule of Representations on the Issues and Preferred Options document.

Strategic alternatives for the purpose of appraisal

10.7 The strategic alternatives previously identified at the issues and options stage have been largely carried forward for the purpose of appraising the proposed policies included in the draft Plan.

- **Option 1: Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP submission version (see above);
- **Option 2: Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged; and
- **Option 3 "Do-Nothing" scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

⁸⁷ the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at <https://www.ceequal.com/>

10.8 Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and SWP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036:

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged.
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the current SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

10.9 In considering the impacts of Option 1 (Proposed Plan), the potential sustainability benefits of the newly introduced policies (WP8 and WP10) and the significant changes made to Policies WP2 and WP6 have also been assessed in relation to the draft policies put forward at the issues and preferred options stage.

10.10 While in many respects proposed Policies WP1-WP10 (Option 1) carry forward and build upon the policies in the existing plan, there are number of important differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation. As can be seen from the results of the appraisal, these are likely to have significant beneficial impacts by comparison with the existing plan.

10.11 Further details of the proposed policies and strategic alternatives (Options 1-3) are set out below.

Policy WP1: Strategic approach to Household and C&I waste

OPTION 1: PROPOSED PLAN - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT)

(a) 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.

(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 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.

(c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).

(d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).

OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT)

Carry forward Policy WP1 from existing SLWP 2012

OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT)

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP1 to expire in 2021

Policy WP2: Strategic approach to other forms of waste**OPTION 1: PROPOSED PLAN - SAFEGUARD EXISTING SITES ONLY**

(a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.

(b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for Construction and Demolition waste of managing 420,275 tonnes 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 the intensification of these sites as appropriate (see Policy WP3).

(c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5.

(d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.

(e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill STW and the Beddington STW will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.

OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS

Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need.

OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES

Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need.

OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP2 to expire in 2021

Policy WP3: Existing waste sites**OPTION 1: PROPOSED PLAN- POLICY WP3**Safeguarding

(a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral 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. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.

(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.

OPTION 2: EXISTING PLAN

Carry forward Policies WP3 & WP4 from existing SLWP 2012.

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policies WP3 and WP4 to expire in 2021.

Policy WP4: Sites for compensatory provision**OPTION 1: PROPOSED PLAN - POLICY WP4**

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 (e.g. 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.

OPTION 2: EXISTING PLAN

Carry forward Policy WP5 from existing SLWP 2012

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP5 to expire in 2021

Policy WP5: Protecting and enhancing amenity**OPTION 1: PROPOSED PLAN - POLICY WP5**

(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 and the possibility of using sustainable modes of transport for incoming and outgoing materials;
- (viii) The safety and security of the site
- (ix) Odour, litter, vermin and birds; and,
- (x) 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.

OPTION 2: EXISTING PLAN

Carry forward Policy WP7 from SLWP 2012

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP7 to expire in 2021

Policy WP6: Sustainable design and construction of waste facilities**OPTION 1: PROPOSED PLAN - POLICY WP6**

(a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL 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 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 line with 2020 London Plan Policy SI2;
- (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, 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 2020 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 waste on site; and,
- (vi) protect, manage and enhance local habitats and biodiversity.

OPTION 2: EXISTING PLAN

Carry forward Policy WP6 from SLWP 2012

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP6 to expire in 2021

Policy WP7: The benefits of waste**OPTION 1: PROPOSED PLAN - POLICY WP7**

(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.

OPTION 2: EXISTING PLAN

Carry forward Policy WP8 from SLWP 2012.

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP8 to expire in 2021.

Policy WP8: New Development affecting waste sites (NEW POLICY)**OPTION 1: PROPOSED PLAN - POLICY WP8**

(a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.

(b) Where new development is proposed that may be affected by an existing waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:

(i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision.

(ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations..

OPTION 2: EXISTING PLAN

Not applicable.

OPTION 3: 'DO-NOTHING' SCENARIO

Do not include NEW POLICY W8 in the draft SLWP for submission.

Policy WP9: Planning obligations**OPTION 1: PREFERRED POLICY**

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.

OPTION 2: EXISTING PLAN

Carry forward Policy WP9 from SLWP 2012.

OPTION 3: 'DO-NOTHING' SCENARIO

Allow existing Policy WP9 to expire in 2021.

Policy WP10: Monitoring and contingencies (NEW POLICY)**OPTION 1: PROPOSED PLAN - POLICY WP8**

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.

OPTION 2: EXISTING PLAN

Not applicable.

OPTION 3: 'DO-NOTHING' SCENARIO

Do not include NEW POLICY W10 in the draft SLWP for submission.

11. Compatibility of the Vision and Objectives against the SA Framework Objectives (Task B1)

Background

11.1 Government guidance emphasises the importance of compatibility analysis as part of the appraisal process as a way of ensuring that emerging plan objectives are fully compatible and actively contribute towards each of the sustainability objectives in the SA Framework (Section 8). Compatibility analysis can also be used to highlight those areas of planning policy that might be in conflict with overarching sustainability objectives in the absence of appropriate mitigation measures.

Proposed Vision

11.2 The draft South London Waste Plan (SLWP) for submission sets out the following proposed Vision.

PROPOSED VISION

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met.

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. 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..

Proposed objectives

11.3 The above Vision is supported by the following proposed objectives.

PROPOSED OBJECTIVES

- (1) Meet the 2020 London Plan target for Household and Commercial and Industrial Waste.
- (2) Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary.
- (3) Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan.
- (4) Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates.
- (5) Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity.
- (6) Ensure the effects of new development are mitigated and, where possible, enhance amenity.

Compatibility analysis

11.4 The Compatibility Matrix in Table 11.1 presents the outcome of testing the proposed Vision and the six objectives against the 16 SA Framework objectives.

Table 11.1:
Compatibility Matrix

| KEY √√ Compatible & Synergistic √ Compatible objectives X Incompatible ? Potential Conflict □ No interaction | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|--|--|---|---|--|---|--|---|--|--|--|--|--|--|--|---|--|
| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land. | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste facilities | (8) SUST. DESIGN To promote the highest standards of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste-related HGV movement | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitive-ness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse effects on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| PROPOSED VISION | | | | | | | | | | | | | | | | |
| By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met. 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. 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 | √√ | √√ | √ | √ | √ | √ | √ | √√ | √√ | √√ | √ | √ | √√ | √ | √√ | √√ |
| PROPOSED OBJECTIVES | | | | | | | | | | | | | | | | |
| Meet the 2020 London Plan target for Household and Commercial and Industrial Waste. | √√ | √√ | √√ | √ | | | | | √ | √ | √ | | √ | | √ | √ |
| Meet the identified needs for C&D Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary | √√ | √√ | √√ | √√ | √√ | √√ | √√ | √ | √ | √ | √√ | √ | √ | √ | √ | √ |
| Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan | √√ | √√ | √ | √ | √ | | | | √√ | √√ | √ | √ | √√ | √ | √√ | √√ |
| 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 | | √ | √ | √ | √√ | √√ | √√ | √√ | √ | √√ | √√ | √√ | √ | √√ | √√ | √√ |

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12. Appraisal of Proposed Policies and Sites (Tasks B3, B4 and B5)

Appraisal Methodology

12.1 The SA Matrix in Table 12.1 sets out the results of appraisal for each of the proposed waste policies (WP1-WP10) set out in the draft SLWP for submission (Part A) and for all of the sites proposed to be safeguarded for waste uses (C1-C12, K2-K4, M1-M18 and S1-S12) (Part B).

12.2 As discussed in Section 10, three strategic alternatives have been identified for the management of South London's waste over the next 15 years from 2021 to 2036. **Option 1 Proposed Plan (Meet Apportionment)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP for submission. **Option 2 Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged. **Option 3 'Do-Nothing' scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

12.3 New policies and significant changes to the proposed policies which have been introduced since the issues and preferred options stage in response to consultation comments or updated evidence are indicated through underlined text. However, Option 1 (Proposed Plan) essentially carries forward the preferred strategy which was subject to appraisal in the previous SA Report⁸⁷.

12.4 Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and WP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036. **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged. **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

12.5 Part B of the SA matrix draws substantially upon the initial site profiling work undertaken by Anthesis consultants together with the subsequent detailed site appraisal work undertaken by the four boroughs to evaluate the suitability, availability and deliverability of each site (see Section 9).

12.6 It should be noted that for existing waste sites which are already in operation and complying with both their planning permissions and waste management licenses, it has been assumed that any potential adverse impacts upon the local environment and neighbouring land-uses (from construction and operation) should have been mitigated already at least some extent as part of the permission.

⁸⁷ the preferred SLWP policies put forward at the issues and preferred options stage and draft Policies WP1-WP10 have been treated as a single strategic option (i.e. Option 1) for the purpose of the appraisal. However any further sustainability benefits arising from the two new policies and additional wording have been reflected in the matrix scoring and associated commentary

12.7 The scoring system used to indicate the nature and magnitude of impacts is set out in Figure 12.1 below.

Figure 12.1: Scoring system for use in the appraisal

| Symbol | Scale of effect |
|--------|--|
| +++ | Large beneficial impacts |
| ++ | Medium beneficial impacts |
| + | Smaller beneficial impact |
| - | Neutral or no impact |
| x | Smaller negative impact |
| xx | Large negative effect. |
| ? | Uncertain impact or the nature and magnitude of the impact is subject to the implementation of other policies in the plan. |

SUSTAINABILITY APPRAISAL MATRIX

Part A: Proposed Policies

| | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|---|--|--|---|--|---|---|--|---|---|--|--|--|---|--|---|--|
| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standard of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| POLICY WP1: STRATEGIC APPROACH TO HOUSEHOLD WASTE AND COMMERCIAL AND INDUSTRIAL WASTE (unchanged) | | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP1 - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT) (a) 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. (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 London Plan apportionment target of managing 9,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036. (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3). (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3). | +++ | +++ | ++ | ++ | ++ | ++ | ++ | ++ | +++ | +++ | ++ | ++ | +++ | ++ | ++ | ++ |
| OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT) Carry forward Policy WP1 from existing SLWP 2012 | +++ | + | + | + | + | X | X | X | X | X | X | X | + | X | X | X |
| OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT) | +++? | +? | +? | +? | +? | X? | X? | X? | X? | X? | X? | X? | + | X? | X? | X? |
| OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP1 to expire in 2021 | xx? | xx? | X | X | X | X? | X | X | xx? | xx? | xx? | xx? | X | xx? | xx? | xx? |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|--|--|--|---|--|--|---|--|---|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites and waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP1 'Strategic Approach to Household and Commercial and Industrial Waste' is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting net self-sufficiency within South London by providing sufficient sites and waste management facilities to meet (but not exceed) the new London Plan apportionment over the plan period; eliminating the need to identify additional waste management sites by working with the waste management industry to develop more efficient, effective and cleaner management practices; and encouraging the intensification of suitable sites.</p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by optimising and intensifying the capacity of new and existing waste management sites; avoiding the uptake of additional employment land in South London for waste management operations; and minimising transport movements and other potentially adverse environmental impacts associated with waste management activities by seeking to promote complementary uses such as manufacturing from waste in line with 'circular economy principles.</p> <p>(9) Promoting sustainable transport objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by seeking to minimise traffic congestion and air pollution arising from HGV movements to and from existing or upgraded waste management facilities for example by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas such as secondary material processing facilities.</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within air quality management areas (AQMA) and 'Air Quality Focus Areas'.</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and by working with the waste management industry to develop more efficient and effective management practices.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(3) Promoting waste re-use, recycling and recovery within South London towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026 by working with the waste management industry to develop more efficient, effective and cleaner management practices; and by encouraging the intensification of suitable sites. Not safeguarding the Beddington Farmlands landfill site in LB Sutton following its scheduled closure in 2023 is also expected to boost waste recovery rates rather than disposal, thereby moving waste management practices further up the waste management hierarchy</p> <p>(4) Helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste e.g. production of that can be used to power waste management and industrial processes.</p> <p>(5) Minimising CO₂ emissions from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices. It should be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP.</p> <p>(6) Ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change including summer heatwaves, contribution to the urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and appropriate sustainable drainage measures (SuDS) in all new or upgraded waste management facilities.</p> <p>(7) Promoting sustainable drainage (SuDS) measures in all new or upgraded waste management facilities in south London.</p> <p>(8) Promoting the highest standards of sustainable design and construction in all new, upgraded or iNTENSIFIED waste management facilities by increasing the number and proportion of waste management facilities achieving an 'Excellent' rating under the BREEAM New Construction 2018 scheme; increasing the number and proportion of waste management facilities promoting the use of responsibly sourced construction materials with lower environmental impact; and implementing sustainable management practices in connection with design, construction, commissioning, handover and aftercare of new, upgraded or intensified waste management facilities.</p> <p>(11) Protecting the quality of South London's environment, particularly for vulnerable receptors by minimising the adverse impacts of noise, vibration, dust, light, soil contamination, odour and water pollution during both the construction and operational phases; ensuring that all new or upgraded waste management facilities are enclosed/ screened; and helping to remediate contaminated sites and therefore reduce the potential risks to human health, adjacent land uses and the local environment.</p> <p>(12) Protecting biodiversity and habitats by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of new or upgraded sites (e.g. green or 'living' roof); and by ensuring that major waste-related developments achieve no net loss in biodiversity value.</p> <p>(14) Minimising the potentially adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London, primarily by eliminating the need for additional sites and also by promoting the more efficient use of industrial land.</p> <p>(15) Minimising the potentially adverse effects on human health and the open environment, particularly within areas affected by social deprivation, by eliminating the need for additional waste management sites in south London sites and ensuring that all new or upgraded waste management facilities are enclosed.</p> <p>(16) Promoting. equalities, accessibility and social inclusion by minimising the potentially adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues.</p> <p><u>CONCLUSIONS</u></p> <p>The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Proposed Policy WP1 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (exceeding the apportionment and therefore carrying forward existing Policy WP1 by safeguarding existing sites and all industrial areas) and Option 2B (aiming to exceed the apportionment by safeguarding existing sites and identifying new waste sites). The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative.</p> | | | | | | | | | | | | | | | |

| | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites and waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standard of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE (amended) | | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP2 - SAFEGUARD EXISTING SITES ONLY (a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. (b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 420,275 tpa [to] 2036. The boroughs of the SLWP will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (Policy WP3). (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5. (d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste. (e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill and the Beddington STW will be supported, | +++ | +++ | ++ | ++ | ++ | + | + | + | +++ | +++ | +++ | + | ++ | + | + | + |
| OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need. | +++ | + | + | + | + | X | X | X | X | X | X | X | + | X | X | X |
| OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need. | +++? | +? | +? | +? | +? | X? | X? | X? | X? | X? | X? | X? | + | X? | X? | X? |
| OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP2 expires in 2021 | xx? | xx? | X | X | X | X? | X | X | xx? | xx? | xx? | xx? | X | xx? | xx? | xx? |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP2 'Strategic Approach to Other Forms of Waste' has been amended since the issues and preferred options stage to reflect the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036. By comparison with the preferred policy put forward at the issues and options stage, Proposed Policy WP2 is now predicted to have greater beneficial impacts on (1) net self sufficiency (3) recycling and recovery (4) circular economy; and (13) economy & employment</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting net self-sufficiency within South London by safeguarding sufficient sites and encouraging the intensification of these sites as appropriate to meet the forecast arisings for C&D waste of 420,275 tpa [to] 2036. There is also an additional commitment as part of this policy to work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by ensuring that any proposals providing for additional construction and demolition waste capacity (either transfer or management) within South London are delivered only through the intensification of existing sites unless this is for compensatory provision. This will promote the efficient use of employment land and avoid the need to identify additional sites for the management of other forms of waste.</p> <p>(9) Promoting sustainable transport objectives within South London by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&D), radioactive, agricultural or hazardous waste streams.</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses, again by avoiding additional HGV movements, traffic congestion and associated impacts on the strategic road network and local environment which would otherwise arise from the development of further sites or 'broad locations' for the transfer or management of construction and demolition (C&D), radioactive, agricultural or hazardous waste streams'. This will be achieved by optimising the capacity of existing C&D waste management facilities, for example through the intensification of existing sites and by providing incentives to operators to manage greater volumes of C&D closer to their licensed capacities</p> <p>(11) Protecting the quality of South London's environment by opposing the development of new facilities for the management of radioactive, agricultural or hazardous waste streams; avoiding additional HGV movements and associated environmental impacts (see above); ensuring that additional C&D waste capacity (either transfer or management) can only be delivered through the intensification and therefore improvement of existing sites; ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed; and implementing environmental enhancements at the Hogsmill and Beddington Sewage Treatment Works respectively.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(3) Promoting waste re-use, recycling and recovery within South London by encouraging the intensification of existing sites for the management of C&D and other waste streams. This policy is now considered to have a medium beneficial impact based on the newly identified surplus in capacity for the management of C&D waste inn 2016 and the inclusion of a new commitment to work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.</p> <p>(4) Helping to secure the transition to a circular economy within south London by promoting the efficient use of employment land for the management of C&D and other waste stream (formerly appraised as a 'small beneficial impact).</p> <p>(5) Minimising CO₂ emissions from waste management activities and associated HGV movements in South London by eliminating the need to identify additional waste management sites, working with the waste management industry to develop more efficient, effective and cleaner management practices. The proposed replacement of the combined heat and power (CHP) plant at the Hogsmill Sewage Treatment Works is expected to deliver a net reduction in CO₂ emissions. It should also be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP.</p> <p>(13) Promoting local employment and South London's economy by eliminating the need for additional waste sites and/or 'broad locations' within SILs and other established industrial areas, thus safeguarding available industrial land and floorspace for other employment uses.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(6) Ensuring that all upgraded/ intensified waste management facilities for the management of C&D and other waste streams are fully adapted to the future impacts of climate change including summer heatwaves, contribution to the UHI effect, flooding and drought by promoting green infrastructure and appropriate SuDS in all upgraded/ intensified facilities for the management of C&D and other waste streams.</p> <p>(7) Ensuring that all upgraded/ intensified waste management facilities for the management of C&D and other waste streams incorporate appropriate sustainable drainage (SuDS) measures.</p> <p>(8) Promoting the highest standards of sustainable design and construction in all upgraded/ intensified waste management facilities for the management of C&D and other waste streams.</p> <p>(12) Protecting biodiversity and habitats by eliminating the need to identify additional waste management sites within south London; promoting an increase in green coverage as part of the design and layout of upgraded/ intensified waste management facilities for the management of C&D and other waste streams; and through specific biodiversity enhancements planned for the Hogsmill STW (Kingston) and the ongoing restoration of the Beddington Farmlands landfill site (due for closure in 2023).</p> <p>(14) Minimising the adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London, primarily by eliminating the need for additional sites for the management of C&D and other waste streams</p> <p>(15) Minimising the potentially adverse effects on human health and the open environment.</p> <p>(16) Promoting equalities objectives by avoiding the potentially adverse impacts which would otherwise be expected to arise from the designation of additional sites for the management of C&D and other streams and associated HGV movements, including air pollution, dust and noise. This is of particular benefit for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues.</p> <p><u>CONCLUSIONS</u></p> <p>The outcome of the appraisal shows that, subject to the implementation of the other SLWP policies, the new London Plan and the relevant Local Plan policies, Proposed Policy WP2 (Option 1) will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework by comparison with both Option 2A (allowing proposals for C&D waste together with all 'other' waste streams including radioactive, agricultural or hazardous waste on both existing sites and all industrial areas and therefore carrying forward Policy WP2 of the existing SLWP) and Option 2B (allowing proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites). The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative. This policy has been strengthened in terms of its potential to meet a number of key sustainability objectives by comparison with Preferred Policy WP1 put forward at the issues and preferred options stage.</p> | | | | | | | | | | | | | | | |

| | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standard of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| POLICY WP3: EXISTING WASTE SITES (unchanged) | | | | | | | | | | | | | | | | |
| <p>OPTION 1: PROPOSED POLICY WP3</p> <p><u>Safeguarding</u> (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.</p> <p><u>Intensification</u> (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.</p> <p><u>Safeguarding Compensatory Provision</u> (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. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.</p> <p>(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.</p> <p><u>Safeguarding Waste Hierarchy</u> (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.</p> | +++ | +++ | +++? | ++ | ++ | | | | +++ | +++ | ++? | ++ | +++ | +++? | ++? | ++? |
| <p>OPTION 2: EXISTING PLAN</p> <p>Carry forward Policies WP3 & WP4 from existing SLWP 2012.</p> | ++ | ++ | ++ | ++ | + | | | | ++ | ++ | + | + | ++ | + | + | + |
| <p>OPTION 3: 'DO-NOTHING' SCENARIO</p> <p>Allow existing Policies WP3 and WP4 to expire in 2021.</p> | XX | XX | X | X | X | | | | XX | XX | X | X | X | X | X | X |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP3 'Existing Waste Sites' is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting net self-sufficiency within South London by ensuring that all existing safeguarded waste management sites (listed in Pages 42-90 of the Issues and Preferred Options document) are carried forward in the new Plan and safeguarded for waste uses only; and by ensuring that compensatory provision is made to make up for the loss of any safeguarded site within the South London Waste Plan area</p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by promoting the intensification of uses on suitable sites in order to allow greater throughput (where there are not likely to be unacceptable impacts on the local road network); supporting waste operators who are seeking to increase the waste management element of waste transfer stations; and eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the local road network and the environment arising from new waste facilities and associated HGV movements).</p> <p>(3) Promoting waste re-use, recycling and recovery as far as practicable within South London towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026 by ensuring that any proposed development on an existing safeguarded waste site is required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development. However, as highlighted in Paragraph 5.26 of the Issues and Preferred Options document, there will inevitably be some occasions where the nature of waste facility will mean that waste operations cannot easily rise up the waste hierarchy by intensification. Not safeguarding the Beddington Farmlands landfill site in LB Sutton following its scheduled closure in 2023 is also expected to boost waste recovery rates rather than disposal, thereby moving waste management practices further up the waste management hierarchy</p> <p>(9) Promoting sustainable transport objectives by avoiding the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the local road network arising from HGV movements); seeking to minimise traffic congestion and air pollution arising from existing or upgraded waste management facilities for example by intensifying existing waste management uses on suitable sites or by co-locating complementary uses in industrial areas such as secondary material processing facilities; and by <i>not</i> providing compensatory provision within the partner south London boroughs to make up for any loss of waste management capacity outside of the plan area.</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses by avoiding the need to identify additional waste management sites or 'broad locations' in South London thereby reducing air pollution from additional waste-related HGV movements; promoting intensification on suitable safeguarded sites; co-locating complementary uses in industrial areas; working with waste operators to encourage a shift from waste transfer operations to waste management practices.</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest); and by working with waste operators to develop more efficient and effective management practices.</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(4) Helping to secure the transition to a circular economy within south London by seeking to drive waste management practices on intensified sites up the Government's waste hierarchy.</p> <p>(5) Minimising CO₂ emissions from waste management activities in South London by eliminating the need for additional waste management sites and associated HGV movements; and working with waste operators to develop more efficient, effective and cleaner management practices through the intensification of existing safeguarded sites. It should be noted that the Draft London Plan 2018 requires all major developments, including new waste facilities, to achieve 'net zero carbon' standards, irrespective of the policies included in the replacement SLWP.</p> <p>(11) Protecting the quality of South London's environment, particularly for vulnerable receptors, by avoiding the adverse impacts of noise, vibration, dust, light, soil contamination, odour and water pollution during both the construction and operational phases that would otherwise arise from the development of new waste management sites (either to exceed the apportionment for South London and/or to compensate for a loss of capacity outside the plan area). However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity' and Policy WP6 'Sustainable Design and Construction of Waste Facilities'.</p> <p>(12) Protecting biodiversity and habitats by eliminating the need for additional waste management sites within south London and associated NO₂ emissions from HGV movements</p> <p>(14) Minimising the potentially adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London, primarily by eliminating the need for additional sites and also by promoting the more efficient use of industrial land to increase throughputs e.g. for C&D waste streams. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity'.</p> <p>(15) Minimising the potentially adverse effects on human health and the open environment, particularly within areas affected by social deprivation, by eliminating the need for additional waste management sites in south London. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity'.</p> <p>(16) Promoting equalities, accessibility and social inclusion by minimising the adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues, that would otherwise arise from the development of new waste management sites within south London, either to exceed the apportionment for South London and/or to compensate for any loss of capacity outside the plan area. However, this assessment is subject to the implementation of other Policies of the plan, particularly WP5 on 'Protecting and Enhancing Amenity' and Policy WP6 'Sustainable Design and Construction of Waste Facilities'.</p> <p><u>NEUTRAL/ NO IMPACT (++) FOR:</u></p> <p>(6) Ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change.</p> <p>(7) Promoting sustainable drainage (SuDS) measures in all new or upgraded waste management facilities.</p> <p>(8) Promoting the highest standards of sustainable design and construction in all new, upgraded or intensified waste management facilities</p> <p><u>CONCLUSIONS</u></p> <p>The outcome of the appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four partner boroughs, Proposed Policy WP3 will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to carrying forward the existing strategic approach set out in Policies WP3 and WP4 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP3 are overwhelmingly negative.</p> | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|---|--|--|---|--|--|---|--|---|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standard of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve | |
| POLICY WP4: SITES FOR COMPENSATORY PROVISION (unchanged) | | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP4 | | | | | | | | | | | | | | | | |
| Proposals for new waste sites to provide compensatory provision should: | | | | | | | | | | | | | | | | |
| (a) Demonstrate that the site is capable of providing suff. compensatory capacity. | | | | | | | | | | | | | | | | |
| (b) Be located on sites: | | | | | | | | | | | | | | | | |
| (i) within SILs or Locally Significant Industrial Location; | | | | | | | | | | | | | | | | |
| (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 in FZss 3a or 3b. | | | | | | | | | | | | | | | | |
| Consider the advantages of the co-location of waste facilities with the mitigative 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 (e.g. Green Belt or MOL); | | | | | | | | | | | | | | | | |
| (ii) are located more than 100 metres from open space; | | | | | | | | | | | | | | | | |
| (iii) are located outside Groundwater Source Protection Zones (i.e. 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 SRN; | | | | | | | | | | | | | | | | |
| (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; or | | | | | | | | | | | | | | | | |
| (viii) offer opportunities to accommodate various related facilities on a single site. | | | | | | | | | | | | | | | | |
| ++ | ++ | +? | +? | + | ++ | +++ | +++? | ++ | + | ++ | ++ | + | ++ | ++ | ++ | |
| OPTION 2: EXISTING PLAN | | | | | | | | | | | | | | | | |
| Carry forward Policy WP5 in existing SLWP | | | | | | | | | | | | | | | | |
| ++ | + | +? | +? | +? | + | ++ | +? | + | +? | + | + | +? | +? | +? | +? | |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | | | | | | | | | |
| Existing Policy WP5 expires in 2021 | | | | | | | | | | | | | | | | |
| XX | XX | X | X | X | XX | XX | XX | XX | X | XX | XX | X | XX | XX | XX | |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|--|---|--|--|---|--|---|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP4 'Sites for Compensatory Provision' is predicted to have:</p> <p>LARGE BENEFICIAL IMPACTS (+++) FOR:</p> <p>(7) Avoiding, reducing and managing flood risk from new waste management sites introduced for the purpose of providing compensatory capacity within the south London Plan area by ensuring that they have no adverse effects of on-site or off-site flood risks in accordance with the relevant Local Plan policies of the four partner boroughs; the sequential and exceptions tests in government planning practice guidance and detailed technical advice in the respective strategic flood risk assessment (SFRA) reports produced for each borough. However these beneficial impacts are dependent on the implementation of these other policies as appropriate e.g. requiring SuDS measures and meeting the requirement for greenfield run-off rates and volumes in the 1 in 100 year storm event plus climate change – see part (b)(iv).</p> <p>MEDIUM BENEFICIAL IMPACTS (++) FOR:</p> <p>(1) Promoting net self-sufficiency within South London by requiring planning applications for new waste sites to demonstrate that the proposed waste management facility is capable of providing sufficient compensatory capacity to make up for the loss of any safeguarded site within the South London Waste Plan area - see part (a).</p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by ensuring that any new waste facilities give full consideration to range of locational constraints and opportunities with respect to the strategic road network, flood risk, strategic open land, public open space, protected groundwater sources, accessibility to sustainable modes of transport, public rights of way, nature conservation areas, Conservation Areas, Areas of Special Local Character (ASLC) and strategic views. The advantages of co-location will be balanced against the potential negative impacts arising from an over-concentration of waste operations in one locality – see part (c).</p> <p>(6) Ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change, primarily - in the case of Policy WP4 - by ensuring that such sites have no adverse effects in relation to on or off-site flood risks in accordance with the relevant Local Plan policies of the four partner boroughs; the sequential and exceptions tests in government planning practice guidance and detailed technical advice in the respective strategic flood risk assessment (SFRA) reports produced for each borough (see above). However, this positive assessment is subject to the relevant Local Plan policies being applied and enforced by the respective local planning authorities.</p> <p>(8) Promoting the highest standards of sustainable design and construction by ensuring that all new waste management facilities within the plan area comply with the relevant environmental criteria set out in parts (a) to (e);</p> <p>(9) Promoting sustainable transport objectives by having particular regard to sites which 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 – see part (d)(iv).</p> <p>(11) Minimising potential risks to human health, adjacent land uses and the local environment by only permitting new waste management sites where it can be demonstrated that the proposed facility is needed to provide compensatory capacity in South London and ensuring that all new waste management facilities within the plan area comply with the relevant environmental criteria set out in parts (a) to (e);</p> <p>(12) Protecting biodiversity and habitats by 'having particular regard to' potential waste management sites which do not have an adverse effect on nature conservation areas protected either by international or national regulations or which are designated in the respective Local Plans of the four partner boroughs. In "meeting the policies of the relevant development plan" under part (f), the requirement upon developers to apply a biodiversity accounting methodology to demonstrate that there is no net loss in biodiversity value may come into play in some circumstances e.g. LB Sutton. Potential adverse impacts on biodiversity and habitats will also be minimised by ensuring that any new waste management facilities are steered towards SILs or locally significant industrial locations</p> <p>(14) Minimising the potentially adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London by 'having particular regard to' sites which do not result in visually detrimental development conspicuous from strategic open land; are located more than 100 metres from open space; and do not adversely affect Conservation Areas, Areas of Special Character or strategic views.</p> <p>(15) Minimising the potentially adverse effects on human health and the open environment. by ensuring that any new waste management facilities are steered towards Strategic Industrial Locations (SILs) or locally significant industrial locations; and by 'having particular regard to' sites which do not result in visually detrimental development conspicuous from strategic open land; are located more than 100 metres from open space; and by including appropriate environmental mitigation measures under part (e). Potentially adverse impacts on human health and the open environment will also be minimised by ensuring that any new waste facilities are only located within SILs or locally significant industrial locations</p> <p>(16) Promoting equalities, accessibility and social inclusion by only permitting new waste sites where it can be demonstrated that the proposed waste management facility is genuinely needed to compensate for the loss of any safeguarded site within the South London Waste Plan area, thus avoiding additional adverse environmental impacts on vulnerable receptors (including equalities target groups) and the strategic road network which would otherwise arise from allowing a greater number of 'windfall' sites to be developed on unsuitable locations. Potential adverse impacts on equalities target groups will also be minimised by ensuring that any new waste management facilities are steered towards SILs or locally significant industrial locations and do not conflict with Public Rights of Way - see parts (b)(i) and (d)(vi).</p> <p>SMALLER BENEFICIAL IMPACTS (+) FOR:</p> <p>(3) Promoting waste re-use, recycling and recovery within South London by giving consideration to the potential advantages of co-location of waste facilities in driving waste management up the Government's waste hierarchy. However, this assessment is subject to the other relevant policies of the SLWP and the respective Local Plans being fully implemented - see part (f).</p> <p>(4) Helping to secure the transition to a circular economy within south London, again by giving consideration to the potential advantages of co-location of waste facilities in driving waste management up the Government's waste hierarchy. However, this assessment is subject to the other relevant policies of the SLWP and the respective Local Plans being fully implemented - see part (f).</p> <p>(5) Minimising CO₂ emissions from waste management activities in South London by only permitting new waste sites where it can be demonstrated that the proposed waste management facility is genuinely needed to compensate for the loss of any safeguarded site within the SLWP area, thus minimising additional CO₂ emissions that would otherwise arise from new waste management facilities and associated HGV movements.</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within air quality management areas (AQMAs) and 'Air Quality Focus Areas'.</p> <p>(13) Promoting local employment by only permitting new waste sites where it can be demonstrated that the proposed facility is genuinely needed to compensate for the loss of any safeguarded site within the SLWP area, thus avoiding the unnecessary loss of employment land across the south London area. This is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest.</p> <p>CONCLUSIONS</p> <p>The outcome of the appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four partner boroughs, Proposed Policy WP4 will have stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to carrying forward the existing approach to the consideration of additional non-safeguarded 'windfall' sites set out in Policy WP5 of the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan incorporating Proposed Policy WP4 are overwhelmingly negative.</p> | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standard of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste - related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| POLICY WP5: PROTECTING AND ENHANCING AMENITY (unchanged) | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP5 | | | | | | | | | | | | | | | |
| (a) Developments for compensatory/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 [site] where unloading, loading, storage and processing takes place should be in 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 and the possibility of using sustainable modes of transport for incoming and outgoing materials (viii) The safety and security of the site (ix) Odour, litter, vermin and birds; and, (x) The design of the facility, particularly <ul style="list-style-type: none"> • 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. | | | | | | | | | | | | | | | |
| + | ++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | ++ | +++ | +++ |
| OPTION 2: EXISTING PLAN | + | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | + | ++ | ++ |
| Carry forward Policy WP7 in SLWP 2012 | + | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | + | ++ | ++ |
| OPTION 3: 'DO-NOTHING' SCENARIO | X | X | XX | XX | XX | XX | XX | XX | XX | XX | XX | XX | X | XX | XX |
| Existing Policy WP7 expires in 2021 | X | X | XX | XX | XX | XX | XX | XX | XX | XX | XX | XX | X | XX | XX |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|--|--|---|--|--|--|---|--|---|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standards of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP5 'Protecting and Enhancing Amenity' is predicted to have:</p> <p>LARGE BENEFICIAL IMPACTS (+++) FOR:</p> <p>(3) Promoting waste re-use, recycling and recovery within South London by requiring a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development;</p> <p>(4) Helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible, again by requiring a Circular Economy Statement to be submitted;</p> <p>(5) Minimising CO₂ emissions from waste and associated HGV movements by requiring an Energy Assessment, BREEAM assessment ('Excellent' rating), Transport Assessment and Travel Plan to be submitted in support of any application;</p> <p>(6) Ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change including flooding, overheating, contribution to the urban heat island (UHI) effect and drought by requiring a Flood Risk Assessment (FRA), SuDS strategy, BREEAM assessment and sustainability statement;</p> <p>(7) Promoting sustainable drainage (SuDS) measures and greenfield run-off rates by 'having particular regard' to the potentially adverse impacts of compensatory or intensified waste developments on groundwater, surface water and watercourses and by requiring a Flood Risk Assessment (FRA), SuDS strategy/site drainage details and hydrological assessment to be submitted. As shown in the Sequential Test (Appendix 3), proposed waste facility located within higher flood risk areas will be required to demonstrate the Government's 'Exceptions test' in order to demonstrate that the development will provide (i) wider sustainability benefits to the community that outweigh flood risk, and (ii) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall;</p> <p>(8) Promoting the highest standards of sustainable design and construction in all such facilities by requiring a BREEAM assessment ('Excellent' rating) and sustainability statement to be submitted in support of any planning application. For larger waste management proposals with potentially 'significant' effects, an Environmental Assessment may be required under the EIA Regulations 2017 where this has been 'screened in' by the relevant local planning authority;</p> <p>(9) Promoting sustainable transport objectives by requiring an Air Quality Impact Assessment, Transport Assessment, Travel Plan, Route Management Strategy and Delivery Servicing Plan/Freight Plan to be submitted as appropriate in support of any planning application for a proposed compensatory or intensified waste development, in order to demonstrate any transport impacts do not significantly adversely affect people and the environment;</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses arising, particularly within 'Air Quality Focus Areas' by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building and requiring the submission of Air Quality Impact Assessments, Transport Assessments, Travel Plans, Route Management Strategies and Delivery Servicing Plans/Freight Plans as appropriate;</p> <p>(11) Protecting the quality of South London's environment, particularly for vulnerable receptors, by ensuring that any potential adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment. More specifically, under Part (c) of this policy, any planning application for such development must be accompanied by an Air Quality Impact Assessment, Transport Assessment and Travel Plan, and 'have particular regard' to the potentially adverse impacts on open space; biodiversity and nature conservation sites; archaeological sites; the historic environment; sensitive receptors, such as schools, hospitals and residential areas; groundwater, surface water and watercourses; air emissions, including dust noise and vibration and traffic generation. arising from waste management operations and associated HGV movements</p> <p>(12) Protecting biodiversity and habitats by 'having particular regard' to the potentially adverse impacts on biodiversity and nature conservation sites protected by international/ national regulations or local planning designations and by requiring a Biodiversity Assessment to be submitted in support of any planning application which is likely to affect nature conservation areas such as Local Nature Reserves, Sites of Metropolitan, Borough or Local Importance for Nature Conservation (SINCs), or green corridors. In certain cases (e.g. LB Sutton) biodiversity accounting evidence will need to be submitted to demonstrate that there will be no net loss of biodiversity value arising from the development.</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by requiring job creation details, including skills, training and apprentice opportunities, together with a Circular Economy Statement to be submitted in support of any planning application for a proposed compensatory or intensified waste development</p> <p>(14) Minimising the adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London by ensuring that all compensatory or intensified waste developments are of a scale, massing or height appropriate to the local townscape or landscape; minimising the requirement for exterior lighting; utilising high-quality boundary treatments; and having 'particular regard' to the potentially adverse impacts on the historic environment. Under this policy, any potentially adverse impacts on townscape and visual amenity will be addressed or mitigated by requiring the submission of an assessment of the impact on the built and historic environment, a landscape assessment and details of landscaping proposals, including screening, landscaping works and boundary treatments to be submitted in support of any planning application;</p> <p>(15) Minimising any potentially adverse effects on human health and the open environment, particularly within areas affected by social deprivation, by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building. Planning applications for a proposed compensatory or intensified waste development must be accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. Details of appropriate measures for protecting Public Rights of Way are also required to be submitted where relevant</p> <p>(16) Promoting equalities, accessibility and social inclusion by requiring an Access Strategy to be submitted in support of any planning application. Since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way is also beneficial.</p> <p>MEDIUM BENEFICIAL IMPACTS (++) FOR:</p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed to achieve levels that will not significantly adversely affect people and the environment; and by requiring applications to be supported by the relevant information listed in the schedule attached to Policy WP5, including a Circular Economy Statement.</p> <p>SMALLER BENEFICIAL IMPACTS (+) FOR:</p> <p>(1) Promoting net self-sufficiency within South London by allowing for developments for compensatory or intensified waste facilities to proceed <i>subject to</i> meeting the requirements of Policy WP4 'Sites for Compensatory Provision' and provided that it can be demonstrated that 'any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment' as required in Part (a)</p> <p>CONCLUSIONS The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP5 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP5 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative</p> | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|---|--|--|---|--|--|---|--|---|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standard of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste - related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES (amended) | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP6 | | | | | | | | | | | | | | | |
| (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL 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 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 line with 2020 London Plan Policy SI2; (ii) be fully adapted and resilient to future impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, 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 2020 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 waste on site; and, (vi) protect, manage and enhance local habitats and biodiversity. | | | | | | | | | | | | | | | |
| +? | ++ | +++ | +++ | +++ | +++ | +++ | +++ | ++ | +++ | +++ | ++ | ++ | + | +++ | +++ |
| OPTION 2: EXISTING PLAN | | | | | | | | | | | | | | | |
| Carry forward Policy WP6 from SLWP 2012 | | | | | | | | | | | | | | | |
| +? | + | ++ | ++ | ++ | ++ | ++ | ++ | + | ++ | ++ | + | + | + | ++ | ++ |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | | | | | | | | |
| Allow existing Policy WP6 to expire in 2021 | | | | | | | | | | | | | | | |
| X | X | XX | XX | XX | XX | XX | XX | X | XX | XX | X | X | XX | XX | XX |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standards of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP6 'Sustainable Design and Construction of Waste Facilities' This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that, where appropriate, the sustainability credentials of a waste development can be measured against the BRE's 'CEQUAAL' scheme in place of the BREAAAM New Construction scheme. It is predicted to have:</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by requiring all waste developments to achieve an 'Excellent' rating under the appropriate BREEAM scheme or under the BRE's CEQUAAL scheme; to make more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement; to demonstrate that they minimise waste and promote sustainable management of construction wastes on site; to minimise on-site CO₂ emissions in line with the 35% target in Policy SI2 of the draft new London Plan and deliver net zero carbon standards through carbon offsetting; and to require all waste developments to give consideration to the recycling of CD&E waste on-site.</p> <p>(3) Promoting waste re-use, recycling and recovery within South London by requiring all proposed waste developments to achieve BREEAM 'Excellent' where viable; demonstrate how it will make more efficient use of resources and reduce the lifecycle impacts of construction materials; demonstrate how it will support circular economy principles through the submission of a Circular Economy Statement (as required under Policy WP5); and demonstrate that the facility will minimise waste and promote sustainable management of construction wastes on site.</p> <p>(4) Helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by requiring submission of a Circular Economy Statement (as required under Policy WP5) and by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&E) waste on-site</p> <p>(5) Minimising CO₂ emissions from waste and associated HGV movements by requiring all major waste developments to minimise on-site CO₂ emissions in line with the 35% target in Policy SI2 of the draft new London Plan; deliver net zero carbon standards through developer contributions to the respective carbon offset funds operated by each of the four boroughs; and requiring all waste developments to achieve BREEAM 'Excellent' where viable.</p> <p>(6) Ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change in accordance with Draft London Plan Policy GG6, particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity; and by requiring all waste developments to have regard to best practice in 'Designing Waste Facilities - A Guide to Modern Design in Waste' (DEFRA, 2008) in considering climate change adaptation measures in schemes e.g. by ensuring that building layout takes advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter; by ensuring that external cladding materials are high mass (e.g. brick or concrete) as they release heat slowly; and by steering storage and unoccupied areas towards the warmest areas of the facility.</p> <p>(7) Avoiding reducing and managing flood risk to and from waste developments by incorporating appropriate SuDS measures in line with Draft London Plan Policy G5, the partner boroughs' Strategic Flood Risk Assessments (SFRAs) and the relevant local planning policies. This requires developers to provide details of the design storm period and intensity, proposed SuDS measures to delay and control the rate of surface water discharged from the site and proposed measures to prevent pollution of the receiving groundwater and/or surface waters. In most cases, proposed waste developments will need to demonstrate that (i) the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be as close as reasonably practicable to the greenfield run-off rate for the same event (in line with the Government's non-statutory standards) (ii) where greenfield run-off rates cannot be achieved, to demonstrate that the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be no more than 3 times the calculated greenfield run-off rate for the same event (iii) demonstrate that the 1 in 30 year rainfall event (plus 30% for climate change) can be contained without flooding; any flooding occurring between the 1 in 30 and 1 in 100 year event (plus 30% for climate change) will be safely contained on site; and that rainfall in excess of the 1 in 100 year event is managed to minimise risks. For locations within the River Wandle catchment, all waste developments must support the objectives of the River Wandle Catchment Flood Management Plan (CFMP).</p> <p>(8) Promoting the highest standards of sustainable design and construction in all such facilities by requiring all waste developments to achieve BREEAM 'Excellent' where viable and, as part of the construction phase, by requiring all waste developments to give consideration to the recycling of construction, demolition and excavation (CD&E) waste on-site.</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses arising by making more efficient use of resources and reduce the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement and by requiring all waste developments to incorporate appropriate measures to address odour issues, for example by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5.</p> <p>(11) Minimising the adverse impacts arising from the construction and operation of waste facilities by requiring all waste developments to achieve BREEAM 'Excellent' where viable; to have regard to DEFRA best practice; to protect, manage and enhance local habitats and biodiversity; to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures which manage risk both to and from the development over its planned lifetime</p> <p>(15) Minimising any potentially adverse effects on human health and the open environment, particularly within areas affected by social deprivation, by ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5</p> <p>(16) Promoting equalities, accessibility and social inclusion by ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change in accordance with Draft London Plan Policy GG6. Climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as, such as the young, the elderly and people suffering from respiratory issues</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(9) Promoting sustainable transport objectives by requiring all waste developments to demonstrate that they minimise waste and promote sustainable management of construction wastes on site.</p> <p>(12) Protecting biodiversity and habitats by requiring all waste developments to demonstrate that they 'protect, manage and enhance local habitats and biodiversity' for example by incorporating green roofs and other blue and green infrastructure measures as appropriate. However this is also subject to the implementation of part (c) of Policy WP5 which seeks to ensure that that development does not harm nature conservation areas</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by making more efficient use of resources and promoting circular economy principles.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(1) Promoting net self-sufficiency within South London and (14) Minimising the adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London.</p> <p><u>CONCLUSIONS</u> The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP6 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan including Proposed Policy WP1 are overwhelmingly negative.</p> | | | | | | | | | | | | | | | |

| | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standard of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| POLICY WP7: THE BENEFITS OF WASTE (unchanged) | | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED PLAN - POLICY WP7 (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 result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities. | +++ | +++ | +++ | +++ | +++ | | | ++? | | +++ | ++? | + | +++ | | +++ | +++ |
| OPTION 2: EXISTING PLAN Carry forward Policy WP8 from SLWP 2012. | ++ | ++ | ++ | ++ | ++ | | | ++ | | ++ | ++ | + | + | | ++ | ++ |
| OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP8 to expire in 2021. | XX | XX | XX | XX | XX | | | X | | XX | X | X | X | | XX | XX |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standards of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| COMMENTARY | <p>Proposed Policy WP7 'The Benefits of Waste' is predicted to have::</p> <p><u>LARGE BENEFICIAL IMPACTS (+++) FOR:</u></p> <p>(1) Promoting net self-sufficiency within South London by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products.</p> <p>(2) Promoting an environmentally sustainable strategic approach to managing South London's waste arisings by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products; and by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy.</p> <p>(3) Promoting waste re-use, recycling and recovery within South London by seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); encouraging the reuse, refurbishment, remanufacture of products or the production of by-products, such as biogas from composting and refuse-derived fuel.</p> <p>(4) Helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible while by recognising that achieving London-wide waste reduction and recycling targets will mean that no new EfW in London will be needed.</p> <p>(5) Minimising CO₂ emissions from waste and associated HGV movements by encouraging proposals for the intensification of existing waste management sites which involve the reuse, refurbishment, remanufacture of products or the production of by-products?</p> <p>(10) Minimising air pollution and potential impacts on sensitive land-uses by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas</p> <p>(15) Minimising any potentially adverse effects on human health and the open environment, particularly within areas affected by social deprivation, by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy while seeking to ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place)</p> <p>(16) Promoting equalities, accessibility and social inclusion by ensuring that by requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(8) Promoting the highest standards of sustainable design and construction by encouraging waste treatment applications which achieve a prolonged product life (i.e. through reuse and refurbishment), provide secondary materials through remanufacture, lead to the production of by-products, such as biogas from composting and refuse derived fuel</p> <p>(11) Minimising the adverse impacts arising from the construction and operation of waste facilities by encouraging proposals for the intensification of existing waste management sites</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(12) Protecting biodiversity and habitats by not supporting the development of additional Energy from Waste (EfW) facilities in line with Objective 7.4 of the London Environment Strategy.</p> <p><u>NEUTRAL IMPACTS FOR:</u></p> <p>(6) Ensuring that all new or upgraded waste management facilities are fully adapted to the future impacts of climate change.</p> <p>(7) Avoiding reducing and managing flood risk to and from waste developments.</p> <p>(9) Promoting sustainable transport objectives.</p> <p>(14) Minimising the adverse impacts of waste management facilities on the quality of townscape and visual amenity in south London. n/a</p> <p><u>CONCLUSIONS</u></p> <p>The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP7 will have stronger beneficial impacts on the majority of SA objectives compared to carrying forward Policy WP6 in the current SLWP 2012. The potential impacts of <i>not</i> proceeding with a new waste plan are generally negative.</p> | | | | | | | | | | | | | | |

| | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites & waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standard of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES (new policy) | | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP8 (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them. (b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, the applicant should: Page 339 Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision. (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations. | + | + | + | | | + | + | | ++ | ++ | | + | | ++ | + | |
| OPTION 2: EXISTING PLAN Not applicable. | N/A | | | | | | | | | | | | | | | |
| OPTION 3: 'DO-NOTHING' SCENARIO Do not include NEW POLICY W8 in draft SLWP for submission. | x? | x? | x? | | | x? | x? | | x | x | | x? | | x | x? | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY To provide sufficient sites and waste facilities for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standards of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste – related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| COMMENTARY | <p>Proposed Policy WP8 'New Development Affecting Waste Sites' is a new policy to reflect the requests from SUEZ (Representation C20/10) and Veolia (Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy. Proposed Policy WP8 is considered to have:</p> <p>MEDIUM BENEFICIAL IMPACTS (++) FOR:</p> <p>(10) Helping to minimise the potential impacts of air pollution on sensitive land-uses by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures such as planting and screening ('agent of change' principle).</p> <p>(11) Helping to minimise adverse impacts arising from the operation of waste facilities on sensitive land-uses by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures ('agent of change' principle).</p> <p>(15) Helping to minimise potentially adverse effects on human health arising from air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate good design and appropriate mitigation measures such as planting, sustainable drainage measures (SuDS) and screening ('agent of change' principle).</p> <p>SMALLER BENEFICIAL IMPACTS (+) FOR:</p> <p>(1) Helping to promote net self-sufficiency within South London over the plan period to 2036 by avoiding unreasonable restrictions being placed on existing operational or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision.</p> <p>(2) Helping to promote an environmentally sustainable strategic approach to managing South London's waste arisings by enabling existing, extant, permitted or intensified sites to continue in operation and therefore avoid the need for new waste sites to be developed in less suitable locations.</p> <p>(3) Promoting waste re-use, recycling and recovery within South London, again by avoiding unreasonable restrictions being placed on existing operational or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision.</p> <p>(7) Helping to avoid, reduce and manage flood risk to and from waste developments by ensuring that that newly proposed developments located within the vicinity of operational waste sites and within flood risk areas incorporate appropriate flood risk alleviation works and sustainable drainage (SuDS) measures.</p> <p>(8) Helping to promote the highest standards of sustainable design and construction by ensuring that newly proposed developments within the vicinity of operational waste sites incorporate appropriate measures to mitigate the impacts of air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by avoiding unreasonable restrictions being placed on existing or intensified waste sites, extant schemes, permissions for additional waste capacity or sites developed for compensatory provision.</p> <p>(16) Helping to promote equalities, accessibility and social inclusion within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities;</p> <p>NEUTRAL IMPACTS FOR:</p> <p>(6) Helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change.</p> <p>(4) Helping to secure the transition to a circular economy within south London.</p> <p>(5) Helping to minimising CO₂ emissions.</p> <p>(9) Helping to deliver sustainable transport objectives.</p> <p>(12) Helping to promote biodiversity and habitats</p> <p>(14) Helping to minimise adverse impacts on the quality of townscape and visual amenity and the historic environment.</p> <p>CONCLUSIONS</p> <p>Through the introduction of the 'agent of change' principle, the appraisal shows that Proposed Policy WP8 is likely to have certain benefits in terms of minimising the potential impacts of existing or intensified waste sites, extant schemes, permitted schemes or sites developed for compensatory provision on human health and quality of life arising from air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance by ensuring that nearby sensitive developments incorporate good design and appropriate mitigation measures such as planting, sustainable drainage measures (SuDS) and screening.</p> | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|---|--|--|---|--|--|---|--|---|-----|-----|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standard of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste - related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve | | |
| POLICY WP9: PLANNING OBLIGATIONS (unchanged) | | | | | | | | | | | | | | | | | |
| OPTION 1: PREFERRED POLICY 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. | + | ++ | | + | + | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | + | +++ | +++ |
| OPTION 2: EXISTING PLAN Carry forward Policy WP9 from WP 2012. | + | ++ | | + | + | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | +++ | + | +++ | +++ |
| OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP9 to expire in 2021. | ? | ? | | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| COMMENTARY | <p>Proposed Policy WP9 'Planning Obligations is predicted to have::</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(2) Helping to promote an environmentally sustainable strategic approach to managing South London's waste arisings by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation sites of international, national, regional or local importance; environmental enhancement measures; flood risk compensation works; archaeological investigation, recording and keeping of artefacts and safeguarding of remains; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; job brokerage, training and skills to encourage local employment opportunities; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.</p> <p>(6) Helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change by potentially providing for flood risk alleviation works, off-site monitoring of the water environment, off-site planting, environmental enhancement measures and other climate change adaptation measures. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.</p> <p>(7) Helping to avoid, reduce and manage flood risk to and from waste developments by potentially contributing towards for off-site flood risk alleviation works.</p> <p>(8) Helping to promote the highest standards of sustainable design and construction by potentially providing for low or zero carbon infrastructure; carbon offsetting contributions; protection of nature conservation; or flood risk alleviation works</p> <p>(9) Helping to deliver sustainable transport objectives by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; off-site monitoring of emissions; and any other strategic transport infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.</p> <p>(10) Helping to minimise air pollution and potential impacts on sensitive land-uses by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; low or zero carbon infrastructure; environmental enhancement measures; off-site monitoring of emissions and the water environment; and the provision and management of off-site or advance planting and screening measures.</p> <p>(11) Helping to minimise the adverse impacts arising from the construction and operation of waste facilities by potentially providing for additional traffic management measures, including the routing of vehicles; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs.</p> <p>(12) Helping to promote biodiversity and habitats through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector by potentially providing for job brokerage, training and skills to encourage local employment opportunities; and the delivery of key strategic infrastructure capable of being funded through the respective community infrastructure levy (CIL) charging schedule and Regulation 123 list in operation within the respective boroughs</p> <p>(15) Helping to minimise potentially adverse effects on human health and the open environment by potentially providing for additional traffic management measures (including the routing of vehicles; access and highway improvements); protection of nature conservation sites of international, national, regional or local importance; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; low or zero carbon infrastructure;; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures; and other environmental enhancement measures</p> <p>(16) Helping to promote equalities, accessibility and social inclusion within south London by ensuring that by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities;</p> <p>It should be noted however that, under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(1) Helping to promote net self-sufficiency within South London by enabling proposals for the intensification of existing waste management sites or compensatory provision to proceed which may otherwise be unacceptable in planning terms.</p> <p>(4) In certain circumstances, helping to secure the transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by potentially providing for low or zero carbon infrastructure and carbon offsetting contributions. However it should be noted that, in principle, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy.</p> <p>(5) Helping to minimising CO₂ emissions in certain circumstances by providing for access and highway improvements; low or zero carbon infrastructure or carbon offsetting contributions.</p> <p>(14) Helping to minimise the adverse impacts of waste management facilities on the quality of townscape and visual amenity and the historic environment in south London by potentially providing for environmental enhancement measures; the provision and management of off-site or advance planting and screening measures; and archaeological investigation, recording and keeping of artefacts and safeguarding of remains.</p> <p><u>NEUTRAL IMPACTS FOR:</u></p> <p>(3) Promoting waste re-use, recycling and recovery within South London.</p> <p><u>CONCLUSIONS</u></p> <p>The appraisal shows that, subject to the implementation of each of the other policies in the new SLWP, the new London Plan and the relevant Local Plan policies in each of the four boroughs, Proposed Policy WP8 is likely to have beneficial impacts on the majority of sustainability objectives making up the SA Framework and these beneficial impacts are broadly unchanged from Policy WP8 of the existing SLWP 2012 (since the policy wording has been carried forward unchanged).. While the effects of <i>not</i> proceeding with a new waste plan and therefore deleting Policy WP8 of the existing SLWP 2012 are appraised as uncertain, rather than necessarily negative, since under the planning and CIL regulations, appropriate planning obligations would still be able to be negotiated with developers and CIL monies collected even in the absence of this policy</p> | | | | | | | | | | | | | | |

| | SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|---|---|--|---|--|---|---|--|---|---|--|--|--|---|--|---|--|
| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| | (1) NET SELF-SUFFICIENCY To provide sufficient sites for all waste streams making up the apportionment | (2) SPATIAL STRATEGY To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | (3) RECYCLING & RECOVERY To drive waste management up the waste hierarchy. | (4) CIRCULAR ECONOMY To promote a transition to a circular economy within south London. | (5) CLIMATE MITIGATION To address the causes of climate change by minimising CO ₂ emissions from waste facilities | (6) CLIMATE ADAPTATION To ensure that all waste management facilities are fully adapted to the impacts of climate change | (7) FLOOD RISK & SuDS To avoid, reduce and manage flood risk to or from waste management facilities | (8) SUST. DESIGN To promote the highest standard of sustainable design and construction. | (9) SUSTAINABLE TRANSPORT To reduce trips, traffic congestion and pollution from waste - related HGV movements | (10) AIR QUALITY To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | (11) ENVIRONMENTAL PROTECTION To minimise the adverse impacts during construction & operation of waste facilities | (12) BIODIVERSITY AND HABITATS To protect and enhance biodiversity & habitats | (13) ECONOMY & EMPLOYMENT To promote employment, & competitiveness of the waste sector in Sth London | (14) TOWNSCAPE AND VISUAL AMENITY To minimise adverse impacts on townscape quality and visual amenity | (15) HEALTH & QUALITY OF LIFE To minimise adverse on human health and protect the open environment | (16) EQUALITIES, & SOCIAL INCLUSION To reduce exclusion, address inequalities & improve |
| POLICY WP10: MONITORING AND CONTINGENCIES (new policy) | | | | | | | | | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP10 The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring. | ++ | ++ | ++ | ++ | + | + | + | ++ | ++ | ++ | ++ | + | + | | ++ | + |
| OPTION 2: EXISTING PLAN Not applicable. | N/A | | | | | | | | | | | | | | | |
| OPTION 3: 'DO-NOTHING' SCENARIO Do not include NEW POLICY W8 in draft SLWP for submission. | X | X | X | X | X? | X? | X? | X | X | X | X | X? | X? | | X | X? |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|--|--|--|---|--|--|---|--|---|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) TOWNSCAPE AND VISUAL AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites and intensify waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve |
| <p>COMMENTARY Proposed Policy WP10 'Monitoring and Contingencies' is a new policy intruded to ensure that the SLWP meets statutory requirements for monitoring and the Mayor of London's request for contingencies. It is considered to have:</p> <p><u>MEDIUM BENEFICIAL IMPACTS (++) FOR:</u></p> <p>(1) Helping to meet the apportionment and promote net self-sufficiency for household and C&I, CD&E and other waste streams within South London by monitoring and reviewing waste imports and exports to and from surrounding regions and the performance of each site in terms of the nature of waste treatment operations, operational throughputs, intensification of uses and introduction of circular economy principles.</p> <p>(2) Helping to optimise and intensify new and existing waste sites within South London and make the most efficient use of industrial land by monitoring and reviewing the performance of each safeguarded site in terms of the nature of waste treatment operations, operational throughputs and the extent to which each site's potential for intensification has been realised.</p> <p>(3) Driving waste management up the waste hierarchy by monitoring rates of waste re-use, recycling and recovery within South London against the relevant targets established in the Mayor's Environmental Strategy 2018, the New London plan and the four Boroughs.</p> <p>(4) Promoting a transition to a circular economy within south London and keeping products and materials at their highest use for as long as possible by monitoring and reviewing the performance of each site in terms of the nature of waste treatment operations, operational throughputs, intensification and the co-location of complementary industrial uses</p> <p>(8) Helping to promote the highest standards of sustainable design and construction in new or upgraded waste facilities by monitoring achievement of the minimum standards required to achieve an 'Excellent' rating under either the BREEAM New Construction 2018 scheme (applicable to buildings) or the Building Research Establishment's (BRE) CEEQUAL scheme (applicable to associated waste infrastructure) – see Proposed Policy WP6 above</p> <p>(9) Helping to deliver sustainable transport objectives with the plan area by monitoring or requiring developers to monitor (i.e. through planning obligations) additional HGV movements arising from new, upgraded or intensified waste sites and associated impacts upon the local road network. Subject to resources, the ongoing monitoring of traffic management measures, vehicle routing schemes; access and highway improvements; transport emissions; and the effectiveness any other strategic transport infrastructure will also help to promote sustainable transport objectives in the context of waste management.</p> <p>(10) Helping to minimise air pollution and potential impacts on sensitive land-uses by monitoring or requiring developers to monitor additional HGV movements arising from new, upgraded or intensified waste sites and associated impacts on air quality pollution particularly on sensitive land-uses.</p> <p>(11) Helping to minimise the adverse impacts arising from the construction and operation of waste facilities by monitoring the effectiveness of new traffic management measures, including the routing of HGVs; access and highway improvements; protection of nature conservation sites; environmental enhancement measures; flood risk compensation works; off-site monitoring of emissions and the water environment; provision and management of off-site or advance planting and screening measures; and any other strategic infrastructure</p> <p>(15) Helping to minimise potentially adverse effects on human health and the open environment by monitoring or requiring developers to monitor (i.e. through planning obligations) air pollution and dust, water pollution, noise, light pollution and other sources of environmental nuisance potentially arising from the construction and operation of new or upgraded waste facilities in order to ensure compliance with the relevant planning policies and conditions, including the minimum standards required to achieve an 'Excellent' rating under either the BREEAM New Construction 2018 scheme (applicable to buildings) or the Building Research Establishment's (BRE) CEEQUAL scheme (applicable to associated waste infrastructure) – see Proposed Policy WP6 above</p> <p><u>SMALLER BENEFICIAL IMPACTS (+) FOR:</u></p> <p>(5) Helping to minimise CO₂ emissions and address the causes of climate change by requiring developers to undertake post-construction monitoring in accordance with the New London Plan 2020 (in line with the Mayoral principle of 'be seen').</p> <p>(6) Helping to ensure that all new or upgraded waste management facilities are adapted to the future impacts of climate change in line with the minimum sustainability requirements of the New London Plan 2020 and environmental best practice by monitoring the implementation and effectiveness of climate change adaptation measures, such as flood risk alleviation works, SuDS measures, planting and other green infrastructure measures aimed at counteracting the urban heat island (UHI) effect</p> <p>(7) Helping to avoid, reduce and manage flood risk to and from waste developments by monitoring the implementation and effectiveness of flood resistance/resilience measures, flood alleviation works and SuDS measures both on-site and off-site.</p> <p>(12) Helping to promote biodiversity and habitats through potentially providing for measures aimed at protecting of nature conservation sites; biodiversity accounting to ensure there is no net loss in biodiversity value arising from a waste development; off-site or advance planting and screening measures; monitoring of emissions to the air and the water environment; and other environmental enhancement measures</p> <p>(13) Promoting local employment, South London's economy and the competitiveness of the waste sector</p> <p>(16) Helping to promote equalities, accessibility and social inclusion within South London by monitoring or requiring developers to monitor (i.e. through the use of planning obligations) the implementation and effectiveness of access and highway improvements; environmental enhancement measures; air quality, water pollution, noise, light pollution and other sources of environmental nuisance potentially arising from the construction and operation of new or upgraded waste facilities. Monitoring of local employment provision and training opportunities will also help to contribute towards equalities objectives;</p> <p><u>NEUTRAL IMPACTS FOR:</u></p> <p>(14) Helping to minimise the adverse impacts of waste management facilities on the quality of townscape and visual amenity and the historic environment in South London</p> <p><u>CONCLUSIONS</u></p> <p>The results of the appraisal shows that, by ensuring that the implementation and effectiveness of the New SLWP 2021-2036 is monitored on an annual basis throughout the plan period against the relevant targets, Proposed Policy WP10 is predicted to have to have beneficial impacts on the majority of sustainability objectives making up the SA Framework. The tracking of progress against sustainability targets and allowing for contingencies is particularly important with respect to meeting the apportionment, achieving self-sufficiency, promoting the efficient use of industrial land, promoting the circular economy and minimising the impact of traffic movements, air pollution, water pollution, noise and light pollution arising from the construction and operation of waste facilities.</p> | | | | | | | | | | | | | | | |

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Part B: Proposed Sites

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | | | | |
| SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: CROYDON | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <tr> <td>C1 Able Waste Services 42 Imperial Way, Croydon CR0 4RR</td> <td>+++</td> <td>++</td> <td>++</td> <td>+</td> </tr> </table> | | | | | | | | | | | | | | | | | C1 Able Waste Services 42 Imperial Way, Croydon CR0 4RR | +++ | ++ | ++ | + | + | + | + | + | + | + | + | + | + | + | + | + | |
| C1 Able Waste Services 42 Imperial Way, Croydon CR0 4RR | +++ | ++ | ++ | + | + | + | + | + | + | + | + | + | + | + | + | + | | | | | | | | | | | | | | | | | | |
| <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>NOTES:</p> <ul style="list-style-type: none"> the site is comprised of mix of new and 1970s warehouses, mostly two-storey, located lies within the Imperial Way Industrial Estate which; good access to strategic road network; potential cumulative impact with New Era Metals ; located within Archaeological Priority Area; located in close proximity to MOL (250m south and east); Historic Park and Garden (250m south); SINC (250m south) and Croydon Panorama (250m east); not located within Air Quality Focus Area, Green Belt or MOL; low flood risk (Flood Zone 1); and low potential for intensification. </div> <div style="width: 45%;"> <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping and regard to the adjacent Roundshaw Park. </div> </div> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="text-align: center;"><u>SUITABILITY SCORE</u></td> <td style="text-align: center;"><u>AVAILABILITY SCORE</u></td> <td style="text-align: center;"><u>VIABILITY</u></td> <td style="text-align: center;"><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td style="text-align: center;">36</td> <td style="text-align: center;">25</td> <td style="text-align: center;">25</td> <td style="text-align: center;">86</td> </tr> </table> | | | | | | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 36 | 25 | 25 | 86 | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36 | 25 | 25 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <tr> <td>Days Aggregates Wiley Depot, Station Yard, Approach Road, Purley, Surrey, CR8 2AL (2.0 ha)</td> <td>+++</td> <td>+++</td> <td>++</td> <td>++</td> <td>++</td> <td></td> <td>+</td> <td></td> <td>+</td> <td>x?</td> <td>x?</td> <td></td> <td>++</td> <td>?</td> <td>x</td> <td>x?</td> </tr> </table> | | | | | | | | | | | | | | | | | Days Aggregates Wiley Depot, Station Yard, Approach Road, Purley, Surrey, CR8 2AL (2.0 ha) | +++ | +++ | ++ | ++ | ++ | | + | | + | x? | x? | | ++ | ? | x | x? | |
| Days Aggregates Wiley Depot, Station Yard, Approach Road, Purley, Surrey, CR8 2AL (2.0 ha) | +++ | +++ | ++ | ++ | ++ | | + | | + | x? | x? | | ++ | ? | x | x? | | | | | | | | | | | | | | | | | | |
| <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>NOTES:</p> <ul style="list-style-type: none"> open aggregates sorting, treatment, recycling and storage facility with associated two-storey mid-century office block and enclosed sheds; reasonably isolated from nearby residential uses and no other waste uses nearby; access via Approach Road - a no through road serving Purley Station, Day Aggregates and London Concrete located adjacent to Purley rail aggregate terminal. located within Purley Cross and Russell Hill AQFA located within Archaeological Priority Area not located within Green Belt or MOL or any other designation Low flood risk (Flood Zone 1); and low potential for intensification (this is a dual-use site, with a minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level). </div> <div style="width: 45%;"> <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 nearby properties, especially with regard to air emissions and noise impacts Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area (Place Specific Policy - Purley District Centre and environs (DM42.1) Not harming biodiversity in the vicinity Providing appropriate soft landscaping </div> </div> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="text-align: center;"><u>SUITABILITY SCORE</u></td> <td style="text-align: center;"><u>AVAILABILITY SCORE</u></td> <td style="text-align: center;"><u>VIABILITY</u></td> <td style="text-align: center;"><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td style="text-align: center;">36</td> <td style="text-align: center;">25</td> <td style="text-align: center;">25</td> <td style="text-align: center;">86</td> </tr> </table> | | | | | | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 36 | 25 | 25 | 86 | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36 | 25 | 25 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <tr> <td>C5A Factory Lane Transfer Station, Factory Lane, Croydon CR0 3RL (1.2 ha)</td> <td>+++</td> <td>++ (potentially)</td> <td>+</td> <td>+</td> <td>+</td> <td>++ (potentially)</td> <td>x</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>++ (potentially)</td> <td>+</td> <td>+</td> <td>+</td> </tr> </table> | | | | | | | | | | | | | | | | | C5A Factory Lane Transfer Station, Factory Lane, Croydon CR0 3RL (1.2 ha) | +++ | ++ (potentially) | + | + | + | ++ (potentially) | x | + | + | + | + | + | + | ++ (potentially) | + | + | + |
| C5A Factory Lane Transfer Station, Factory Lane, Croydon CR0 3RL (1.2 ha) | +++ | ++ (potentially) | + | + | + | ++ (potentially) | x | + | + | + | + | + | + | ++ (potentially) | + | + | + | | | | | | | | | | | | | | | | | |
| <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>NOTES:</p> <ul style="list-style-type: none"> large triple-storey building surrounded by hardstanding with power lines overhead; located within larger industrial area close to other waste facilities but away from residential neighbourhoods; good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236. located within Archaeological Priority Area; located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site. Located in close proximity to Wandle Park to the south east of the site. not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and some potential for intensification and for co-locating other waste uses on the site. </div> <div style="width: 45%;"> <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 </div> </div> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="text-align: center;"><u>SUITABILITY SCORE</u></td> <td style="text-align: center;"><u>AVAILABILITY SCORE</u></td> <td style="text-align: center;"><u>VIABILITY</u></td> <td style="text-align: center;"><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td style="text-align: center;">42</td> <td style="text-align: center;">25</td> <td style="text-align: center;">25</td> <td style="text-align: center;">92</td> </tr> </table> | | | | | | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 42 | 25 | 25 | 92 | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 42 | 25 | 25 | 92 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|---|---|--|--|---|--|--|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | |
| C5B Factory Lane Reuse & Recycling Centre, Factory Lane, Croydon CR0 3RL (0.4 ha) | ++ | + | + | ++ | + | X | + | + | + | + | + | + | + | + | + | |
|  Type: Transfer Waste Accepted: HCI Max throughput: 19,736 tpa Licensed capacity: 200,000 tpa | NOTES: <ul style="list-style-type: none"> large triple-storey building surrounded by hardstanding with power lines overhead; located within larger industrial area close to other waste facilities but away from residential neighbourhoods; good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236. located within Archaeological Priority Area; located within Flood Zone 2 (medium risk). Flood Zone 3 (high risk) to the south east of the site. Located in close proximity to Wandle Park to the south east of the site. not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and low potential for intensification. | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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 | | | | SUITABILITY SCORE 42 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE 92 | | | | | | | |
| C6 Fishers Farm Reuse & Recycling Centre North Downs Road, New Addington, Croydon, Surrey, CR0 0LF (2 ha) | ++ | + | ++ | + | ++ | + | + | ? | ? | ? | + | ? | ? | ? | | |
|  Type: Transfer (Household Waste Amenity Site) Waste Accepted: HCI Max throughput: 6,895 tpa Licensed capacity: 15,125 tpa | NOTES: <ul style="list-style-type: none"> open local authority household reuse and recycling center; located on the edge of the residential area adjacent to farmland; no other waste uses nearby; good access from North Downs Road; located within Archaeological Priority Area; located in close proximity to MOL and SINC to west of site and 100m north of site; Not located within an Air Quality Focus Area (AQFA). not located within any other environmental designation; Flood Zone 1 (low risk); and Low potential for intensification. | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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 ea buffer zones are respected; Designing a facility that does not impact on the openness of Metropolitan Green Belt and Providing appropriate soft landscaping | | | | SUITABILITY SCORE 28 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE 78 | | | | | | | |
| C7 Henry Woods Waste Management Land Adj To Unit 9, Mill Lane Trading Est, Croydon CR0 4AA (0.7 ha) | ++ | + | ++ | + | + | + | + | + | + | + | + | + | ? | ? | | |
|  Type: Transfer + treatment Waste Accepted: HCI and C&D Max throughput: 12,885 tpa Licensed capacity: 74,999 tpa | NOTES: <ul style="list-style-type: none"> open skip storage and waste sorting located within an existing strategic industrial area (SIL); existing residential uses located to the south and a site allocation for mixed uses lies to the east; access from road network from Mill Lane; no other safeguarded waste sites in Purley Way North; very constrained site; located within Archaeological Priority Area; located in close proximity to SINC and undesignated open space to the south of the site; not located within an Air Quality Focus Area (AQFA); not located within any other environmental designation; Flood Zone 1 (low risk); and no potential for intensification. | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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. | | | | SUITABILITY SCORE 42 AVAILABILITY SCORE 25 VIABILITY 25 TOTAL SITE SCORE 92 | | | | | | | |

SA FRAMEWORK OBJECTIVES

| | (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | |
|--|--|--|---|--|---|---|---|--|---|--|---|--|--|---|--|--|---|---------------------------|------------------|-------------------------|----|----|----|----|--|---------------------------|------------------|-------------------------|----|----|----|----|
| | (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | |
| | To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | |
| C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR (0.37 ha) | ++ | ++ | ++ | + | + | | + | | + | + | + | + | + | ? | ? | ? | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 829 430 966"> <tr><td>Type</td><td>Recycling and Reuse</td></tr> <tr><td>Waste Accepted</td><td>HCI/ Hazardous</td></tr> <tr><td>Max throughput</td><td>4,213 tpa</td></tr> <tr><td>Licensed capacity</td><td>4,999 tpa</td></tr> </table> | Type | Recycling and Reuse | Waste Accepted | HCI/ Hazardous | Max throughput | 4,213 tpa | Licensed capacity | 4,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> modern double-storey warehouse with adjacent hardstanding area for metal sorting; within the Imperial Way SIL which comprises a mix of new and mid-century warehouses, mostly two-storey; good access to the strategic road network from Imperial Way; two waste operators in this area: Able Waste Services and New Era Metals; located within Archaeological Priority Area located in close proximity to Croydon Panorama and MOL 300m to south east of site; not located within an Air Quality Focus Area (AQFA); not located within any other environmental designation; Flood Zone 1 (low risk); and no potential for intensification. | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 in the archaeological priority area of Mere Bank; Not harming biodiversity in the vicinity; Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected; and Providing appropriate soft landscaping. <table border="0" data-bbox="1632 882 2819 945"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>42</td> <td>25</td> <td>25</td> <td>92</td> </tr> </table> | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 42 | 25 | 25 | 92 |
| Type | Recycling and Reuse | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI/ Hazardous | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 4,213 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 4,999 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 42 | 25 | 25 | 92 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peartree Farm Featherbed Lane, Croydon CR0 9AA (0.8 ha) | ++ | + | ++ | + | + | | + | | X | X | X | | + | X | X | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1302 430 1438"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI and C&D</td></tr> <tr><td>Max throughput</td><td>59,282</td></tr> <tr><td>Licensed capacity</td><td>37,500 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | HCI and C&D | Max throughput | 59,282 | Licensed capacity | 37,500 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> uncovered sorting facility, skip storage area along with vehicle storage and repair; located within the green belt surrounded by farmland; access from Featherbed Lane; no other waste uses nearby located within Archaeological Priority Area and Green Belt; not located within an Air Quality Focus Area (AQFA); Flood Zone 1 (low risk); and no potential for intensification <table border="0" data-bbox="445 1365 1573 1428"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>32</td> <td>25</td> <td>25</td> <td>82</td> </tr> </table> | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 32 | 25 | 25 | 82 | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 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 open spaces; evaluating and preserving any archaeological remains as the site is in the archaeological priority area - croydon downs; minimising flood risk on- and off-site; not harming biodiversity in the vicinity; ensuring nearby watercourses are not harmed by the development and ea buffer zones are respected; designing a facility that does not impact on the openness of Metropolitan Green Belt; and providing appropriate soft landscaping | | | | | | | |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI and C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 59,282 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 37,500 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 32 | 25 | 25 | 82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C10 Purley Oaks Reuse and Recycling Centre Brighton Road, Purley, Surrey, CR8 2BG (0.22 ha) | ++ | + | X | X | | | | | X | X | X | | + | X? | XX | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1774 430 1911"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>9,099</td></tr> <tr><td>Licensed capacity</td><td>12,535</td></tr> </table> | Type | Transfer | Waste Accepted | HCI | Max throughput | 9,099 | Licensed capacity | 12,535 | <p>NOTES:</p> <ul style="list-style-type: none"> open local authority reuse and recycling centre located within a local centre and surrounding residential neighbourhood. adjacent to Purley Oaks Depot; adjacent to a site designation for Gypsy and Traveller pitches in the Croydon Local Plan 2018; good access to the strategic road network from Brighton Road; located within Archaeological Priority Area; not located within an Air Quality Focus Area (AQFA); not located within any other environmental designation; Flood Zone 3 (high risk) with Flood Zone 2 (medium risk) on the periphery; and no potential for intensification. | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 EA buffer zones are respected providing appropriate soft landscaping <table border="0" data-bbox="1632 1858 2819 1921"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>30</td> <td>25</td> <td>25</td> <td>80</td> </tr> </table> | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 30 | 25 | 25 | 80 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 9,099 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 12,535 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 30 | 25 | 25 | 80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|---|---|--|--|---|--|--|---|--|--|--|--|--|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | |
| C11 Safety Kleen Unit 6b, Redlands, Coulsdon, Surrey, CR5 2HT (0.28 ha) | ++ | ++ (potentially) | ++ (potentially) | ++ (potentially) | ++ | + | + | + | + | + | x? | + | x? | x? | + | | | | | | | |
|  <table border="1" data-bbox="44 844 421 976"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>Hazardous</td></tr> <tr><td>Max throughput</td><td>Not operational</td></tr> <tr><td>Licensed capacity</td><td>12,782 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | Hazardous | Max throughput | Not operational | Licensed capacity | 12,782 tpa | NOTES: <ul style="list-style-type: none"> large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear; to the east of the site is residential housing with a buffer of green space and trees; good access from the road network via Redlands; no other waste uses nearby; railway lines to the west, therefore an opportunity to use rail to transport waste; located in close proximity to SINC 50m to east not located within an Air Quality Focus Area (AQFA); Archaeological Priority Area or any other environmental designation; Flood Zone 1 (low risk); | | | | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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 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. | | | | | | |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | Hazardous | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | Not operational | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 12,782 tpa | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | x? | xx | | ++ | | | +++ | x? | x? | | | | | | | | |
| C12 Stubbs Mead Depot Factory Lane, Croydon CR0 3RL (2.71 ha) | | | | | | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1264 421 1438"> <tr><td>Type</td><td>Vehicle depot related to HH waste collection</td></tr> <tr><td>Waste Accepted</td><td>n/a</td></tr> <tr><td>Max throughput</td><td>n/a</td></tr> <tr><td>Licensed capacity</td><td>n/a</td></tr> </table> | Type | Vehicle depot related to HH waste collection | Waste Accepted | n/a | Max throughput | n/a | Licensed capacity | n/a | NOTES: <ul style="list-style-type: none"> large double-storey shed with hardstanding for vehicles; located within the Factory Lane industrial area and away from residential uses; there are a number of other waste facilities in this area; access via Factory Lane; located in close proximity to a locally listed historic park and garden to the south; not located within any other environmental designation; Flood Zone 2 (medium risk) and Flood Zone 3 (high risk). The north west corner of the site falls within FZ3 and the rest of the site is FZ2; and no potential for intensification (site proposed for mixed residential and employment) | | | | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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 EA buffer zones are respected. | | | | | | |
| Type | Vehicle depot related to HH waste collection | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | n/a | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | n/a | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | n/a | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |
| C13 Solo Wood Recycling Factory Lane, Croydon CR0 3RL (2.71 ha) | + | + | + | +? | + | ++ | x? | + | + | + | + | ? | ++ | + | + | | | | | | | |
|  <table border="1" data-bbox="44 1726 421 1858"> <tr><td>Type</td><td>Wood recycling</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>5,000 tpa</td></tr> <tr><td>Licensed capacity</td><td>n/a</td></tr> </table> | Type | Wood recycling | Waste Accepted | HCI | Max throughput | 5,000 tpa | Licensed capacity | n/a | NOTES: <ul style="list-style-type: none"> single-storey building and open storage; located within larger industrial area adjacent to a waste transfer site and a household reuse and recycling centre but away from residential neighbourhoods; active gas holders lie to the north-west of the site with power lines overhead; good access from the strategic road network. Access via Factory Lane to the trunk road network, A235/A236. located within Flood Zone 2 (medium risk) and at high/medium risk of surface water flooding. not located within an Air Quality Focus Area (AQFA) or any other environmental designation; and little or no potential for intensification as the site is small | | | | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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; and ensuring that nearby watercourses are not harmed by the development and EA buffer zones are respected. | | | | | | |
| Type | Wood recycling | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 5,000 tpa | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | n/a | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |

SA FRAMEWORK OBJECTIVES

| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
|--|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access |

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: KINGSTON

| Site Name & Location | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) | (15) | (16) |
|---|---|-----|-----|-----|---------------------------|-----|-----|-----|---|------|------|------|-------------------------|------|------|------|
| K2 Genuine Solutions Group Solutions House, Unit 1A, 223 Hook Rise South KT6 7LD (0.26 ha) | ++ | ++ | ++ | ++ | | | + | | x? | x? | x? | | + | x? | x? | |
|  Type: Recycling & Reuse Waste Accepted: HCI Max throughput: 1,630 tpa (planning application 5,000 tpa) Licensed capacity: 74,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> WEEE treatment facility located within an industrial area surrounded by similar large industrial sheds; two-storey office block fronting on Hook Rise South beyond which is the Kingston Bypass fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear residential properties lie to the east and west of the industrial area; to the north of Kingston bypass is residential properties, Swallow Park Gypsy and Traveller site and to the west of this is school playing fields no other waste uses nearby access from Hook Rise South located within Tolworth Key Area of Change (Kingston Neighbourhood Policy SB1) located in close proximity to MOL to the east of Chessington SIL and green corridor to the south of the site; not located within any other environmental designation; and Flood Zone 1 (low risk)/low potential for intensification. | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 nearby properties, 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; and providing appropriate soft landscaping. | | | | | | | |
| | <u>SUITABILITY SCORE</u> | | | | <u>AVAILABILITY SCORE</u> | | | | <u>VIABILITY</u> | | | | <u>TOTAL SITE SCORE</u> | | | |
| | 46 | | | | 25 | | | | 25 | | | | 96 | | | |
| Kingston Civic Amenity Site Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (0.7 ha including Kingston WTS) | ++ | ++ | + | + | + | + | + | + | + | + | + | + | + | x? | ? | ? |
|  Type: Transfer Waste Accepted: HCI Max throughput: 14,363 tpa Licensed capacity: 25,000 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> enclosed local authority reuse and recycling centre (Household Waste Amenity Site) within an industrial area; surrounded by open space but away from residential uses; on same site as Kingston Waste Transfer Centre and close to Hogsmill Sewage Treatment Works; adjacent to Hogsmill River but little opportunity to transport waste by water; access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of the Hogsmill; located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) & Area of Archaeological Significance; located in close proximity to MOL, Green chain and SINC to the north and south of the site not located within Air Quality Focus Area (AQFA) or any other environmental designation; Flood Zone 1 (low risk); and | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; 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 Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve; 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 EA buffer zones are respected; Providing appropriate soft landscaping. | | | | | | | |
| | <u>SUITABILITY SCORE</u> | | | | <u>AVAILABILITY SCORE</u> | | | | <u>VIABILITY</u> | | | | <u>TOTAL SITE SCORE</u> | | | |
| | 38 | | | | 25 | | | | 25 | | | | 88 | | | |
| K4 Kingston Waste Transfer Station Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ (1.3 ha including Kingston RRC) | +++ | + | + | + | + | + | + | + | +++ | + | + | + | ++ | + | + | + |
|  Type: Transfer Waste Accepted: HCI Max throughput: 68,883 tpa Licensed capacity: 200,500 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> Household, Commercial & Industrial Waste Transfer Station located within an industrial area; Double-storey enclosed shed with hardstanding for vehicles; surrounded by open space but away from residential uses; on same site as Kingston RRC (Site K3) and close to Hogsmill Sewage Treatment Works; adjacent to Hogsmill River little opportunity to transport waste by water; access via Chapel Mill Road. Additions to the Strategic Cycle Network proposed along the north bank of Hogsmill; located within Hogsmill Valley Key Area of Change (Neighbourhood Policy KT1) & Area of Archaeological Significance; located in close proximity to MOL, Green chain and SINC to the north and south of the site; not located within Air Quality Focus Area (AQFA) or any other environmental designation; Flood Zone 1 (low risk). | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; 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 Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve; 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 EA buffer zones are respected designing a facility that does not impact on the openness of Metropolitan Open Land; and providing appropriate soft landscaping. | | | | | | | |
| | <u>SUITABILITY SCORE</u> | | | | <u>AVAILABILITY SCORE</u> | | | | <u>VIABILITY</u> | | | | <u>TOTAL SITE SCORE</u> | | | |
| | 38 | | | | 25 | | | | 25 | | | | 88 | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access |

SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: MERTON

| | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---------------------------|---------------------------|-------------------------|-------------------------|----------------|------------|-------------------|-------------------|-----|-----|-----|-----|---|---|----|---|-----|---|---|----|---|----|---|----|----|
| <p>M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA (0.06 ha)</p>  <table border="1"> <tr><td>Type</td><td>Transfer +recycling</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>3,729 tpa</td></tr> <tr><td>Licensed capacity</td><td>5,000 tpa</td></tr> </table> | Type | Transfer +recycling | Waste Accepted | HCI | Max throughput | 3,729 tpa | Licensed capacity | 5,000 tpa | + | + | ++ | + | + | + | + | + | ++? | + | + | x? | + | + | + | + | |
| Type | Transfer +recycling | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 3,729 tpa | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 5,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> Household, Commercial & Industrial Waste Transfer Station located within Willow Lane Industrial Estate; open area with skips. residential uses to the south of the site (Connect House was converted to residential use via Prior Approval); concentration of waste uses in Willow Lane Industrial Estate; road access via Wandle Way located within Archaeological Priority Area located in close proximity to areas of MOL and SINC to the east and west of Willow SIL not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk); and no potential for intensification <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping. ensuring the safety clearances for the overhead power lines crossing the site are respected. <table border="1"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table> | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | |
| 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | | | | | | |
| <p>M2 European Metal Recycling Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX (1.03 ha)</p>  <table border="1"> <tr><td>Type</td><td>Recycling + Reuse</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>70,100 tpa</td></tr> <tr><td>Licensed capacity</td><td>109,500 tpa</td></tr> </table> | Type | Recycling + Reuse | Waste Accepted | HCI | Max throughput | 70,100 tpa | Licensed capacity | 109,500 tpa | +++ | +++ | +++ | +++ | + | + | + | + | ++? | + | + | x? | + | ? | + | + | |
| Type | Recycling + Reuse | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 70,100 tpa | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 109,500 tpa | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> collection of large double-storey warehouses and office space with hardstanding for metal sorting, vehicles and skips located in Willow Lane Industrial Estate; residential uses to the south of the site (Connect House converted to residential use via Prior Approval); already a concentration of waste uses in Willow Lane Industrial Estate; road access via Ellis Road, suitable for large vehicles; located within Archaeological Priority Area; located in close proximity to areas of MOL and SINC to the east and west of Willow SIL not located within Air Quality Focus Area or any other environmental designation; Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The majority of the site is within Flood Zone 2; and low potential for intensification. <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping. ensuring the safety clearances for the overhead power lines crossing the site are respected. <table border="1"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>38</td> <td>25</td> <td>25</td> <td>88</td> </tr> </table> | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 38 | 25 | 25 | 88 | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | |
| 38 | 25 | 25 | 88 | | | | | | | | | | | | | | | | | | | | | | |
| <p>M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA (0.38 ha)</p>  <table border="1"> <tr><td>Type</td><td>Recycling</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>5,000</td></tr> <tr><td>Licensed capacity</td><td>n/a (exempt site)</td></tr> </table> | Type | Recycling | Waste Accepted | HCI | Max throughput | 5,000 | Licensed capacity | n/a (exempt site) | + | + | ++ | ++ | ? | ? | x? | + | + | ? | ? | ? | ? | ++ | ? | x? | x? |
| Type | Recycling | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 5,000 | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | n/a (exempt site) | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> facility for sorting and baling paper for recycling located in Willow Lane Industrial Estate; hardstanding for material sorting, vehicles and skips together with two storey portakabin office; residential uses to the south of the site (Connect House converted to residential use via Prior Approval); already a concentration of other waste uses in Willow Lane Industrial Estate; access via Willow Lane; located within Archaeological Priority Area located in close proximity to areas of MOL and SINC to the east and west of Willow SIL; not located within Air Quality Focus Area or any other environmental designation; Flood Zone 2 (medium risk); and low potential for intensification. <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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. <table border="1"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>38</td> <td>25</td> <td>25</td> <td>88</td> </tr> </table> | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 38 | 25 | 25 | 88 | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | |
| 38 | 25 | 25 | 88 | | | | | | | | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|---|--------------------------|---------------------------|------------------|-------------------------|----|----|----|----|---|---|---|---|---|---|---|---|---|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | | | |
| M4 Garth Road Re-use and Recycling Centres, 66-69 Amenity Way, Garth Road, Merton SM4 4AX (0.7 ha including M5) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> local authority reuse and recycling centre located within the Garth Road Industrial Estate; the site incorporate a household reuse and recycling centre and Merton Council's LACW Transfer Station; a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west; there is housing adjacent to the site at Beaver Close; access is gained via Garth Road, which also has houses along it; not located within Air Quality Focus Area (AQFA), Archaeological Priority Area or any other environmental designation; Flood Zone 1 (low risk); and no potential for intensification. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 providing appropriate soft landscaping. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="0" style="width:100%; text-align:center;"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table> | | | | | | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 36 | 25 | 25 | 86 | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36 | 25 | 25 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type | Re-use, recycling and transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | LACW | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 14,594 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 25,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1" style="width:100%; text-align:center;"> <tr> <td>++</td> <td>++</td> <td>++</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>x?</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>?</td> <td>?</td> </tr> </table> | | | | | | | | | | | | | | | | | ++ | ++ | ++ | + | + | + | + | x? | + | + | + | + | + | + | + | ? | ? |
| ++ | ++ | ++ | + | + | + | + | x? | + | + | + | + | + | + | + | ? | ? | | | | | | | | | | | | | | | | | |
| Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX (0.45 ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> local authority reuse and recycling centre located within the Garth Road Industrial Estate; the site incorporate a household reuse and recycling centre and Merton Council's LACW Transfer Station; a waste transfer station lies adjacent to the north of the site (Suez) and Merton Council's highways depot facilities lie to the south and west; there is housing adjacent to the site at Beaver Close; access is gained via Garth Road, which also has houses along it; not located within Air Quality Focus Area (AQFA), Archaeological Priority Area or any other environmental designation; Flood Zone 1 (low risk); and no potential for intensification. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 providing appropriate soft landscaping. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="0" style="width:100%; text-align:center;"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table> | | | | | | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 36 | 25 | 25 | 86 | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36 | 25 | 25 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type | Re-use, recycling and transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | LACW | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 14,594 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 25,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|---|--|--|--|--|--|--|--|--|--------------------------|---------------------------|------------------|-------------------------|----|----|----|----|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | | |
| M6 George Killoughery 41 Willow Lane, Merton CR4 4NA | ++ | ++ | ? | ? | + | + | x? | + | + | + | + | ? | ++ | ? | ? | ? | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 856 409 987"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>71,253 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | C&D | Max throughput | 71,253 tpa | Licensed capacity | 74,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> a large site located within Willow Lane industrial estate comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste; concentration of waste uses within this industrial estate; River Wandle lies to the west of the sit but no real potential for transportation of waste by water; Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site access via Willow Lane; located within Archaeological Priority Area; located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow Lane SIL; not located within or any other environmental designation; Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2; low potential for intensification | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 residential amenity for nearby properties, 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; designing a facility that does not impact on the openness of Metropolitan Open Land; providing appropriate soft landscaping; and ensuring nearby watercourses are not harmed and there is an 8-metre buffer zone from the top of the riverbank. <table border="0" data-bbox="1656 940 2789 997"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>32</td> <td>25</td> <td>25</td> <td>82</td> </tr> </table> | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 32 | 25 | 25 | 82 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 71,253 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 74,999 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 32 | 25 | 25 | 82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| LMD Waste Management (Abbey Industrial Estate) Yard adjacent to Unit 2 Abbey Industrial Estate, Willow Lane, Merton CR4 4NA(0.06 ha) | ++ | ++ | ? | ? | + | + | + | + | + | + | + | ? | ++ | ? | ? | ? | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1360 409 1491"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>24,444 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | C&D | Max throughput | 24,444 tpa | Licensed capacity | 74,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> mainly open hardstanding site located within Willow Lane industrial estate surrounded by similar industrial properties; Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south there is a concentration of waste uses in Willow Lane Industrial Estate. access from Wandle Way; located within Archaeological Priority Area; located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk); no potential for intensification (given the small scale and lack of permission for waste use for this site). | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping. <table border="0" data-bbox="1656 1302 2789 1358"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table> | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 44 | 25 | 25 | 94 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 24,444 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 74,999 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M8 LMD Waste Management Wandle Way 32 Willow Lane, Merton CR4 4NA (0.07 ha) | +++ | ++ | ? | ? | + | + | x? | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1833 409 1963"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>38,738 tpa</td></tr> <tr><td>Licensed capacity</td><td>50,000 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | C&D | Max throughput | 38,738 tpa | Licensed capacity | 50,000 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> double-storey shed with attached single-storey offices located within Willow Lane industrial estate; Connect House, which was converted to residential use via Prior Approval, lies opposite the site; there is a concentration of waste uses in the Willow Lane Industrial Estate; access via Willow Lane; located within Archaeological Priority Area; located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow Lane SIL; not located within Air Quality Focus Area or any other environmental designation; Flood Zone 2 (medium risk); and unsuitable for intensification due to proximity of Connect House and the throughput ratio is above average for this type of facility. | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and Providing appropriate soft landscaping. <table border="0" data-bbox="1656 1858 2789 1915"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>38</td> <td>25</td> <td>25</td> <td>88</td> </tr> </table> | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 38 | 25 | 25 | 88 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 38,738 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 50,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 38 | 25 | 25 | 88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|--|---|---|---|---|--|--|---|--|--|---|--|--|---|--|--------------------------|---------------------------|------------------|-------------------------|--|--|----|----|----|----|--|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | |
| M9 Maguire Skips (Wandle Way) (0.19 ha) Storage Yard Wandle Way, Merton CR4 4NB | +++ | ++ | ? | ? | + | + | + | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | |
|  | <p>NOTES:</p> <ul style="list-style-type: none"> mainly open hardstanding for skips and sorting together with a double-storey covered area located within Willow Lane industrial estate; Connect House, converted to residential use via Prior Approval, lies opposite the site; there is a concentration of waste uses in the Willow Lane Industrial Estate. This facility lies near residential properties and has been the subject of noise and planning enforcement investigations; access via Wandle Way; located within Archaeological Priority Area; located in close proximity to Areas of MOL and SINC which lie to the east and west of Willow SIL; not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (medium risk); and unsuitable for intensification since the throughput ratio is above average for this type of facility | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping. | | | | | | <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> <td></td> <td></td> </tr> <tr> <td>34</td> <td>25</td> <td>25</td> <td>84</td> <td></td> <td></td> </tr> </table> | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | 34 | 25 | 25 | 84 | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 34 | 25 | 25 | 84 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M10 Powerday (Weir Court) (0.3 ha) Weir Court, Merton SW19 8UG | +++ | ++ | ? | ? | + | + | + | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | |
|  | <p>NOTES:</p> <ul style="list-style-type: none"> enclosed double-storey shed with outside hardstanding space located within Durnsford Road SIL; Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site; three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and Reston Waste Transfer and Recovery. Access via Weir Road to strategic road network; although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; located within Archaeological Priority Area located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and low potential for intensification (throughput per hectare is good for this type of facility). | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; 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 ea buffer zones are respected; designing a facility that does not impact on the openness of metropolitan open land; providing appropriate soft landscaping; and ensuring the safety clearances for the overhead power lines crossing the site are respected. | | | | | | <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> <td></td> <td></td> </tr> <tr> <td>42</td> <td>25</td> <td>25</td> <td>92</td> <td></td> <td></td> </tr> </table> | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | 42 | 25 | 25 | 92 | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 42 | 25 | 25 | 92 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M11 Morden Transfer Station (0.8 ha) Amenity Way, Merton SM4 4AX | +++ | ++ | ? | ? | + | + | + | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | |
|  | <p>NOTES:</p> <ul style="list-style-type: none"> double-storey industrial shed with hardstanding; there is a number of waste uses in this area, including Merton Reuse and Recycling Centre. site is adjacent to residential properties in Beaver Close; access from Amenity Way located in close proximity to Green Corridor and a SINC on the north-western boundary. Cemetery designated MOL; not located within an Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk); and low potential for intensification | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; 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; and providing appropriate soft landscaping. | | | | | | <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> <td></td> <td></td> </tr> <tr> <td>34</td> <td>25</td> <td>25</td> <td>84</td> <td></td> <td></td> </tr> </table> | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | 34 | 25 | 25 | 84 | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 34 | 25 | 25 | 84 | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--|---|---|---|--|--|---|---|--|--|---|--|--|--|--|--|--|--|--|--|--|--|--------------------------|---------------------------|------------------|-------------------------|----|----|----|----|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | | |
| M12 NJB Recycling (0.35 ha) 77 Weir Road, Merton SW19 8UG | +++ | ++ | ? | ? | + | + | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 829 430 961"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>48,687 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | C&D | Max throughput | 48,687 tpa | Licensed capacity | 75,000 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> enclosed two and three-storey sheds and warehouses for vehicles located within Durnsford Road SIL; Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site. The site is also adjacent to a Gypsy and Travellers site in LB Wandsworth; there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery; access via Weir Road to strategic road network; although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; located within Archaeological Priority Area located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); low potential for intensification (throughput per hectare is good for this type of facility). | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; 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 for nearby properties e.g. 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 there is an 8-metre buffer zone between the top of the riverbank and the edge of the development; designing a facility that does not impact on the openness of metropolitan open land; providing appropriate soft landscaping. <table border="0" data-bbox="1656 997 2804 1050"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table> | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 36 | 25 | 25 | 86 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 48,687 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 75,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36 | 25 | 25 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M13 One Waste Clearance Plot 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA (0.1 ha) | +++ | ++ | ++ | + | + | + | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1365 430 1497"> <tr><td>Type</td><td>Transfer+ recycling</td></tr> <tr><td>Waste Accepted</td><td>HCI and CD&E</td></tr> <tr><td>Max throughput</td><td>20,000 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table> | Type | Transfer+ recycling | Waste Accepted | HCI and CD&E | Max throughput | 20,000 tpa | Licensed capacity | 75,000 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> waste transfer station (fully enclosed unit) within Abbey Industrial Estate which forms part of Willow Lane SIL; surrounded by other businesses on the industrial estate including waste management facilities, vehicle repairers and manufacturing industries; Connect House, converted to residential use via Prior Approval, lies to the south of the site; access from Wandle Way via a purpose-built access and driveway onto the industrial estate; located within Archaeological Priority Area; located in close proximity to areas of MOL and SINC which lie to the east and west; not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk); and low potential for intensification since throughput per hectare is good (based on the few weeks facility in operation). | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping. <table border="0" data-bbox="1656 1354 2804 1407"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table> | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 44 | 25 | 25 | 94 |
| Type | Transfer+ recycling | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI and CD&E | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 20,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 75,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M14 Reston Waste Transfer and Recovery Unit 6, Weir Road, Merton SW19 8UG (0.28 ha) | +++ | ++ | ? | ? | + | + | + | + | + | + | ? | ++ | + | ? | ? | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1774 430 1906"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>71,595 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table> | Type | Transfer | Waste Accepted | C&D | Max throughput | 71,595 tpa | Licensed capacity | 74,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> enclosed three-storey shed and warehouses with outside hardstanding space for vehicles located within Durnsford Road SIL; Vantage House, converted to residential use via Prior Approval, lies at the southern edge of the site; there are three waste transfer facilities within the same industrial estate: NJB Recycling, Maguire Skips, and Reston Waste Transfer and Recovery; access via Weir Road to strategic road network; although the River Wandle is located nearby, there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks; located within Archaeological Priority Area; located in close proximity to River Wandle (SINC, Green Corridor, Open Space & MOL) not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk). But adjacent to Flood Zone 2 (medium risk) and Flood Zone 3 (high risk); and low potential for intensification (throughput per hectare is good for this type of facility). | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 nearby properties, 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 there is an 8-metre buffer zone between the top of the riverbank and the edge of the development designing a facility that does not impact on the openness of Metropolitan Open Land; and providing appropriate soft landscaping. <table border="0" data-bbox="1656 1900 2804 1953"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>36</td> <td>25</td> <td>25</td> <td>86</td> </tr> </table> | | | | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 36 | 25 | 25 | 86 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 71,595 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 74,999 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36 | 25 | 25 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

SA FRAMEWORK OBJECTIVES

(A) SUSTAINABLE WASTE MANAGEMENT (B) CLIMATE CHANGE (C) ENVIRONMENTAL QUALITY (D) COMMUNITY WELL-BEING

| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION |
|--|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|
| To provide sufficient sites and waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access |

M15 Riverside AD Facility
43 Willow Lane, Merton CR4 4NA (0.87 ha)

| | | | | | | | | | | | | | | | |
|-----|-----|-----|-----|----|---|---|----|---|---|---|---|----|---|---|---|
| +++ | +++ | +++ | +++ | ++ | + | + | ++ | + | + | + | ? | ++ | + | + | + |
|-----|-----|-----|-----|----|---|---|----|---|---|---|---|----|---|---|---|



| | |
|-------------------|------------------------------|
| Type | Management (AD) |
| Waste Accepted | Mixed garden & kitchen waste |
| Max throughput | 36,341 tpa |
| Licensed capacity | 99,999 tpa |

NOTES

- Anaerobic Digestion (AD) facility which takes mixed garden and kitchen waste;;
- the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane);
- comprised of double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste;
- concentration of waste uses within this industrial estate;
- the River Wandle is located adjacent but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site
- vehicle access to the site is provided via an existing route running along the northwest boundary;
- located within Archaeological Priority Area;
- located in close proximity to land designated as MOL, Open Space, a Green Corridor and a SINC which lie to the east and west of Willow Lane SIL. A Conservation Area is located to the north east of the site;
- not located within an Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2.
- low potential for intensification (since the throughput per hectare is good for this type of facility).

RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- 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;
- 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 there is an 8-metre buffer zone between the top of the riverbank and the edge of the development;
- designing a facility that does not impact on the openness of Metropolitan Open Land; and
- providing appropriate soft landscaping.

| | | | |
|--------------------------|---------------------------|------------------|-------------------------|
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> |
| 32 | 25 | 25 | 82 |

M16 Riverside Bio Waste Treatment Centre
43 Willow Lane, Merton CR4 4NA (0.87 ha)

| | | | | | | | | | | | | | | | |
|-----|-----|-----|-----|----|---|---|----|---|---|---|---|----|---|---|---|
| +++ | +++ | +++ | +++ | ++ | + | + | ++ | + | + | + | ? | ++ | + | + | + |
|-----|-----|-----|-----|----|---|---|----|---|---|---|---|----|---|---|---|



| | |
|-------------------|-------------|
| Type | Composting |
| Waste Accepted | HCI |
| Max throughput | 51,715 tpa |
| Licensed capacity | 100,000 tpa |

NOTES

- enclosed in-vessel composting facility which takes mixed garden and kitchen waste
- the site lies on the western edge of the Willow Lane SIL to the south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane);
- there is already concentration of waste uses within this industrial estate;
- the River Wandle is located adjacent but no real potential for transportation of waste by water;
- Connect House, which was converted to residential use via Prior Approval, lies to the north east of the site;
- vehicle access to the site is provided via an existing route running along the northwest boundary;
- located within Archaeological Priority Area;
- close to MOL, Open Space, a Green Corridor and SINC which lie to the east and west of Willow Lane SIL.
- not located within an Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk) and Flood Zone 1 (low risk). The northern part and the eastern edge of the site falls within FZ2 and the northern half falls within FZ2; and
- low potential for intensification (since the throughput per hectare is good for this type of facility);

RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- 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;
- 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 there is an 8-metre buffer zone between the top of the riverbank and the edge of the development;
- designing a facility that does not impact on the openness of Metropolitan Open Land; and
- providing appropriate soft landscaping.

| | | | |
|--------------------------|---------------------------|------------------|-------------------------|
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> |
| 32 | 25 | 25 | 82 |

M17 UK and European (Ranns)
Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA (0.5 ha)

| | | | | | | | | | | | | | | | |
|-----|-----|-----|-----|----|---|---|----|---|---|---|---|----|---|---|---|
| +++ | +++ | +++ | +++ | ++ | + | + | ++ | + | + | + | ? | ++ | + | + | + |
|-----|-----|-----|-----|----|---|---|----|---|---|---|---|----|---|---|---|



| | |
|-------------------|---------------------------|
| Type | Treatment to produce soil |
| Waste Accepted | C&D |
| Max throughput | 804 tpa |
| Licensed capacity | 75,000 tpa |

NOTES:

- a large site comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste located within the Willow Lane industrial estate;
- concentration of waste uses within this industrial estate;
- River Wandle lies to the west of the sit but no real potential for transportation of waste by water;
- Connect House, converted to residential use via Prior Approval, lies to the north east of the site
- access via Willow Lane;
- located within Archaeological Priority Area;
- located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL;
- not located within Air Quality Focus Area or any other environmental designation;
- Flood Zone 2 (medium risk);
- low potential for intensification.

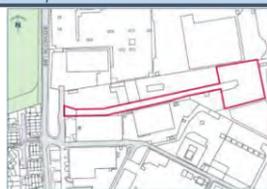
RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED

- 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;
- 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.

| | | | |
|--------------------------|---------------------------|------------------|-------------------------|
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> |
| 38 | 25 | 25 | 88 |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | |
|--|---|---|--|---|---|---|--|--|---|---|--|--|---|--|--|-------------------------|----|----|----|----|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | |
| M18 Wandle Waste Management, Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA (0.07 ha) | + | + | X | X | ? | ? | + | ? | ? | ? | ? | + | ? | X? | ? | | | | | |
|  | NOTES: <ul style="list-style-type: none"> double-storey shed located within the Willow Lane industrial estate; there is a concentration of waste uses within this industrial estate; Connect House, converted to residential use via Prior Approval, lies to the north east of the site River Wandle lies to the west of the sit but no real potential for transportation of waste by water; access via Willow Lane; located within Archaeological Priority Area; located in close proximity to areas of MOL and SINC which lie to the east and west of Willow Lane SIL; not located within Air Quality Focus Area or any other environmental designation; Flood Zone 1 (low risk); unlikely to be potential for intensification. The throughput on this site is very small and it is not clear what operation takes place on the site as no permission seems to exist for a hazardous waste transfer facility for this site. | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping and regard to the adjacent Roundshaw Park. | | | | <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table> | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 44 | 25 | 25 | 94 |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | |
| 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | |
| SITES PROPOSED TO BE SAFEGUARDED FOR WASTE MANAGEMENT USES: SUTTON | | | | | | | | | | | | | | | | | | | | |
| S22 777 Recycling Centre, 154a Beddington Lane CR0 4TE (0.97 ha) | +++ | +++ | +++ | +++ (potentially) | ++ | + | + | ++ | X? | X? | + | ? | +++ | + | + | + | | | | |
|  | NOTES: <ul style="list-style-type: none"> large double-height and triple-height modern industrial sheds and hardstanding for skip storage in Beddington SIL; there is a concentration of waste uses in Beddington SIL. Also located nearby are the Beddington Farmlands EFW facility, the Croydon Transfer Station and a concrete batching operation at 154 Beddington Lane; the site backs onto tram lines to the rear; HGV access from Coomber Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; located close to Wandle Valley Regional Park and MOL to the west of Beddington Lane; not located within Air Quality Focus Area or within any other environmental designations; Flood Zone 1 (low flood risk); and no potential for intensification. | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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; 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; ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic. | | | | <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>42</td> <td>25</td> <td>25</td> <td>92</td> </tr> </table> | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 42 | 25 | 25 | 92 |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | |
| 42 | 25 | 25 | 92 | | | | | | | | | | | | | | | | | |
| S2 Beddington Farmlands ERF Energy Recovery Facility (ERF) Beddington Waste Management Facility, 105 Beddington Lane CR0 4TD (5.4 ha) | +++ | +++ | +++ | +++ | +++ | + | + | ++ | + | ? | + | ? | +++ | + | + | + | | | | |
|  | NOTES: <ul style="list-style-type: none"> large energy recovery facility (ERF) located within the boundaries of the Wandle Valley Regional Park, adjacent to Viridor Recycling Facility and Beddington Farm landfill site; concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL; access from Beddington Lane and the vehicle routing to the site is through Beddington SIL. There is traffic congestion in nearby Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within MOL, Metropolitan Green Chain, SINC, Wandle Valley Regional Park and in Archaeological Priority Area; not located within Air Quality Focus Area; Low flood risk (Flood Zone 1); no potential for intensification. This is a new facility and therefore no opportunities to upgrade or intensify. | | | | RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED <ul style="list-style-type: none"> 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 limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads protecting the residential amenity of nearby properties, 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 MOL; providing appropriate soft landscaping; and ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic. | | | | <table border="0"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>34</td> <td>25</td> <td>25</td> <td>84</td> </tr> </table> | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 34 | 25 | 25 | 84 |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | |
| 34 | 25 | 25 | 84 | | | | | | | | | | | | | | | | | |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|--|--|------------------------------------|----------------|-----------|----------------|------------|-------------------|------------|----|---------------------|--|---|--------------------------------|---------------------------------------|---|----|----|----|---|----|---|----|----|----|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TG (0.2 ha)</p>  <table border="1" data-bbox="44 829 430 955"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>Hazardous</td></tr> <tr><td>Max throughput</td><td>9,601</td></tr> <tr><td>Licensed capacity</td><td>75,000</td></tr> </table> | | | | | | | | | | | | | | | | | Type | Transfer | Waste Accepted | Hazardous | Max throughput | 9,601 | Licensed capacity | 75,000 | + | + | + | +? | +? | +? | + | ++ | x? | x? | + | +? | + | +? | +? | +? |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | Hazardous | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 9,601 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 75,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> modern double-height industrial units incorporating office space located on the Beddington Lane industrial estate at the northern end of the Beddington SIL; there is concentration of waste uses in the Beddington SIL and at the Beddington Waste Management Facility (105 Beddington Lane); access is from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; located close to MOL, Metropolitan Green Chain, SINC and Wandle Valley Regional Park on the west side of Beddington Lane; not located within Air Quality Focus Area; Low flood risk (Flood Zone 1); low potential for intensification. | | | | | | | | | | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads protecting the residential amenity of nearby properties, 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; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic. | | | | | | | | | | <p><u>SUITABILITY SCORE</u> 42</p> | <p><u>AVAILABILITY SCORE</u> 25</p> | <p><u>VIABILITY</u> 25</p> | <p><u>TOTAL SITE SCORE</u> 92</p> | | | | | | | | | | |
| <p>Croydon Transfer Station Endeavour Way, Beddington Farm Road, Sutton CR0 4TD (0.74 ha)</p>  <table border="1" data-bbox="44 1270 430 1396"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>27,799 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table> | | | | | | | | | | | | | | | | | Type | Transfer | Waste Accepted | HCI | Max throughput | 27,799 tpa | Licensed capacity | 75,000 tpa | ++ | ++ (potentially) | ++ (potentially) | +++ (potentially) | + (potentially) | +? | + | ++ | x? | x? | + | +? | + | +? | +? | +? |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 27,799 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 75,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> the site lies in Beddington SIL and consists of double- and triple-height enclosed sheds with hardstanding for vehicles; There is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods; Access from Endeavour Way There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; not located within Air Quality Focus Area; low flood risk (Flood Zone 1); and some potential for intensification since the site is operating below the average throughput for this type of facility. | | | | | | | | | | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic. | | | | | | | | | | <p><u>SUITABILITY SCORE</u> 42</p> | <p><u>AVAILABILITY SCORE</u> 25</p> | <p><u>VIABILITY</u> 25</p> | <p><u>TOTAL SITE SCORE</u> 92</p> | | | | | | | | | | |
| <p>S5 Hinton Skips Land to the rear of 112 Beddington Lane, Sutton CR0 4YZ</p>  <table border="1" data-bbox="44 1711 430 1858"> <tr><td>Type</td><td>Transfer + treatment of skip waste</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>8,000 tpa</td></tr> <tr><td>Licensed capacity</td><td>75,000 tpa</td></tr> </table> | | | | | | | | | | | | | | | | | Type | Transfer + treatment of skip waste | Waste Accepted | C&D | Max throughput | 8,000 tpa | Licensed capacity | 75,000 tpa | ++ | ++ (potentially) | ++ (potentially) | +++ (potentially) | + (potentially) | +? | + | ++ | x? | x? | + | +? | + | +? | +? | +? |
| Type | Transfer + treatment of skip waste | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 8,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 75,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> the site lies within Beddington SIL and consists of an enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles; there is a concentration of waste uses in Beddington SIL and nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods; the site does not have direct frontage onto the Beddington Lane being set back some 400m from the highway at the end of a made up access way that also provides access to a number of other businesses. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; located in close proximity to Archaeological Priority Area Scheduled monument 80m to the west not located within Air Quality Focus Area or any other environmental designation; medium flood risk (Flood Zone 2); and some potential for intensification since the estimated throughput is lower than the average throughput for this type of facility and the planning permission states that up to 50,000 tonnes will be managed on the site. | | | | | | | | | | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; and providing appropriate soft landscaping; ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic. | | | | | | | | | | <p><u>SUITABILITY SCORE</u> 40</p> | <p><u>AVAILABILITY SCORE</u> 25</p> | <p><u>VIABILITY</u> 25</p> | <p><u>TOTAL SITE SCORE</u> 90</p> | | | | | | | | | | |

| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|---|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--------------------------|---------------------------|------------------|-------------------------|----|----|----|----|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | | | | | | | | | | | | | | | | | | | | | | | | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S6 Hydro Cleansing, Hill House, Beddington Farm Road CR0 4XB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ++ | ++ | ++ | +? | + | +? | +? | ++ | x? | x? | +? | +? | ++ | +? | +? | +? | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 787 430 913"> <tr><td>Type</td><td>Transfer +treatment</td></tr> <tr><td>Waste Accepted</td><td>Wastewater/CD&E</td></tr> <tr><td>Max throughput</td><td>13,912 tpa</td></tr> <tr><td>Licensed capacity</td><td>100,000 tpa</td></tr> </table> | | | | | | | | Type | Transfer +treatment | Waste Accepted | Wastewater/CD&E | Max throughput | 13,912 tpa | Licensed capacity | 100,000 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> the site lies within Beddington SIL adjacent to the Surrey Jaguar Centre and the Royal Mail Centre and consists of a two-storey 1960s office block with facility to rear there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; access from Beddington Farm Road. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; not located within Air Quality Focus Area or any other environmental designation; low flood risk (Flood Zone 1); and low potential for intensification since the throughput is typical for this type of facility. | | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; evaluating and preserving any archaeological remains; and providing appropriate soft landscaping. <table border="1" data-bbox="1632 766 2864 840"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table> | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 44 | 25 | 25 | 94 |
| Type | Transfer +treatment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | Wastewater/CD&E | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 13,912 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 100,000 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S7 Kimpton Park Way Civic Amenity Site Kimpton Park Way SM3 9QH (0.44ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ++ | ++ | ++ | ++ | + | +? | + | + | +? | +? | +? | +? | ++ | + | +? | +? | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1165 430 1291"> <tr><td>Type</td><td>CA Site</td></tr> <tr><td>Waste Accepted</td><td>HCI</td></tr> <tr><td>Max throughput</td><td>14,799 tpa</td></tr> <tr><td>Licensed capacity</td><td>24,999 tpa</td></tr> </table> | | | | | | | | Type | CA Site | Waste Accepted | HCI | Max throughput | 14,799 tpa | Licensed capacity | 24,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> open local authority reuse and recycling centre located in the north-west of the Kimpton SIL; access from the road network via Kimpton Park Way and Minden Road; located close to Kimpton Linear Park, which is designated as green chain, MOL and SINC; not located within Archaeological Priority Area; not located within Air Quality Focus Area or any other environmental designations; good access to strategic road network; low flood risk (Flood Zone 1); and some potential for intensification. | | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads protecting the residential amenity of nearby properties, 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; and providing appropriate soft landscaping; and ensuring the nearby underground electricity cable is neither damaged nor made inaccessible. <table border="1" data-bbox="1632 1228 2864 1302"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>44</td> <td>25</td> <td>25</td> <td>94</td> </tr> </table> | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 44 | 25 | 25 | 94 |
| Type | CA Site | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | HCI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 14,799 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 24,999 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 44 | 25 | 25 | 94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S8 King Concrete 124 Beddington Lane CR0 4YZ (0.6 ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| +++ (potentially) | +++ (potentially) | ++ (potentially) | ++ (potentially) | +? | +? | + | + | x? | x? | +? | +? | ++ | +? | +? | +? | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  <table border="1" data-bbox="44 1564 430 1690"> <tr><td>Type</td><td>Transfer</td></tr> <tr><td>Waste Accepted</td><td>C&D</td></tr> <tr><td>Max throughput</td><td>1,060 tpa</td></tr> <tr><td>Licensed capacity</td><td>74,999 tpa</td></tr> </table> | | | | | | | | Type | Transfer | Waste Accepted | C&D | Max throughput | 1,060 tpa | Licensed capacity | 74,999 tpa | <p>NOTES:</p> <ul style="list-style-type: none"> the site lies within Beddington SIL and consists of an open site for concrete production and aggregates recovery; there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; access from Beddington Lane and also nearby in Beddington Waste Management Facility, 105 Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; not located within Air Quality Focus Area or any other environmental designation; potential for intensification since this site is managing well under the average throughput for this type of facility. The permission states that the facility will recycle 20,000 tpa of CD&E waste on site. | | | | | | | | | <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic <table border="1" data-bbox="1632 1648 2864 1722"> <tr> <td><u>SUITABILITY SCORE</u></td> <td><u>AVAILABILITY SCORE</u></td> <td><u>VIABILITY</u></td> <td><u>TOTAL SITE SCORE</u></td> </tr> <tr> <td>30</td> <td>25</td> <td>25</td> <td>80</td> </tr> </table> | | | | | | | | | <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | 30 | 25 | 25 | 80 |
| Type | Transfer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Accepted | C&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Max throughput | 1,060 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Licensed capacity | 74,999 tpa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <u>SUITABILITY SCORE</u> | <u>AVAILABILITY SCORE</u> | <u>VIABILITY</u> | <u>TOTAL SITE SCORE</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 30 | 25 | 25 | 80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|--|
| (A) SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | |
| <p>S9 Premier Skip Hire Unit 12, Sandiford Road, SM3 9RD (0.1 ha)</p> <p>++ ++ + + + +? + + +? +? + +? +? +?</p> | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> a two-storey office and warehouse building with hardstanding for skip storage located within the Kimpton SIL; the site is near to Kimpton household recycling and reuse centre (Site S7 above); the closest residential properties are 75-100m to the south and west of the site on Hamilton Avenue good road access to Sandiford Road via Kimpton Road; located close to SINC (Pyl Brook) to south and west; not located within Archaeological Priority Area; Air Quality Focus Area or any other environmental designations; low flood risk (Flood Zone 1); and low potential for intensification <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and providing appropriate soft landscaping. <p><u>SUITABILITY SCORE</u> 46 <u>AVAILABILITY SCORE</u> 25 <u>VIABILITY</u> 25 <u>TOTAL SITE SCORE</u> 96</p> | | | | | | | | | | | | | | | | |
| <p>S10 Raven Recycling Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR (0.25 ha)</p> <p>+++ + +? ? +? +? +? +? +? +? +? +? +? +? +? +?</p> | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> the site lies within Beddington SIL and consists of double-height enclosed sheds with hardstanding for skips; there is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane which are mostly located away from residential areas; access from Endeavour Way. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; not located within Air Quality Focus Area or any other environmental designation; low flood risk (Flood Zone 1); and low potential for intensification the throughput per hectare is average for this type of facility. <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads; and providing appropriate soft landscaping. <p><u>SUITABILITY SCORE</u> 42 <u>AVAILABILITY SCORE</u> 25 <u>VIABILITY</u> 25 <u>TOTAL SITE SCORE</u> 92</p> | | | | | | | | | | | | | | | | |
| <p>S11 TGM Environmental 112 Beddington Lane, Sutton CR0 4TD</p> <p>+ + +? ? ? +? x? +? ? ? +? ? + ? ? ?</p> | | | | | | | | | | | | | | | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> the site occupies the land at the front of 112 Beddington Lane within Beddington SIL and consists of waste paper and waste cardboard recovery and transfer facility comprising a weigh bridge, portacabin offices, parking and areas for sorting and baling (bulking for onward reprocessing of paper and plastic); Viridor EfW and Beddington Sewage Treatment Works lie to the west. A Wickes DIY & Trade supplies store is located immediately to the north of the application site, and CPI Group a printing and publishing company are located in an industrial unit immediately to the south; there is a concentration of waste uses in Beddington SIL mostly located away from residential areas. However the closest residential uses are around 40m to the west on the opposite side of Beddington Lane in Harrington Close; access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area and in close proximity to a Scheduled monument 80m to the west; not located within Air Quality Focus Area or any other environmental designation; medium flood risk (Flood Zone 2); and low potential for intensification. The operation has been relocated from 156 Beddington Lane and the additional space enables baling on site which did not take place on the previous site. The throughput is average <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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; 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; and providing appropriate soft landscaping. <p><u>SUITABILITY SCORE</u> 40 <u>AVAILABILITY SCORE</u> 25 <u>VIABILITY</u> 25 <u>TOTAL SITE SCORE</u> 90</p> | | | | | | | | | | | | | | | | |

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| SA FRAMEWORK OBJECTIVES | | | | | | | | | | | | | | | | | |
|---|--|---|--|---|---|---|--|--|--|---|--|--|---|--|--|-------------------------------|--|
| (A)SUSTAINABLE WASTE MANAGEMENT | | | | (B) CLIMATE CHANGE | | | | (C) ENVIRONMENTAL QUALITY | | | | (D) COMMUNITY WELL-BEING | | | | | |
| (1) NET SELF-SUFFICIENCY | (2) SPATIAL STRATEGY | (3) RECYCLING & RECOVERY | (4) CIRCULAR ECONOMY | (5) CLIMATE MITIGATION | (6) CLIMATE ADAPTATION | (7) FLOOD RISK & SuDS | (8) SUST. DESIGN | (9) SUSTAINABLE TRANSPORT | (10) AIR QUALITY | (11) ENVIRONMENTAL PROTECTION | (12) BIODIVERSITY AND HABITATS | (13) ECONOMY & EMPLOYMENT | (14) HISTORIC TOWNSCAPE & AMENITY | (15) HEALTH & QUALITY OF LIFE | (16) EQUALITIES, & SOCIAL INCLUSION | | |
| To provide sufficient sites & waste facilities for all waste streams making up the apportionment | To optimise and intensify new & existing waste sites to make the most efficient use of industrial land | To drive waste management up the waste hierarchy. | To promote a transition to a circular economy within south London. | To address the causes of climate change by minimising CO ₂ emissions from waste facilities | To ensure that all waste management facilities are fully adapted to the impacts of climate change | To avoid, reduce and manage flood risk to or from waste management facilities | To promote the highest standards of sustainable design and construction. | To reduce trips, traffic congestion and pollution from waste – related HGV movements | To minimise air pollution and impacts on sensitive land-uses arising from waste facilities | To minimise the adverse impacts during construction & operation of waste facilities | To protect and enhance biodiversity & habitats | To promote employment, & competitiveness of the waste sector in Sth London | To minimise adverse impacts on townscape quality and visual amenity | To minimise adverse on human health and protect the open environment | To reduce exclusion, address inequalities & improve access | | |
| S12 Country Waste Skip Hire 79-85 Beddington Lane, Sutton CR0 4 TH (2.8 ha) | | | | | | | | | | | | | | | | | |
| ++ | ++ | + | + | + | + | + | + | + | + | + | + | + | + | + | + | | |
| <p>NOTES:</p> <ul style="list-style-type: none"> the site is currently vacant but the newly permitted development is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring; there is a concentration of waste uses in Beddington SIL which are mostly located away from residential areas; access from Beddington Lane. There is traffic congestion on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and on-street parking; located within Archaeological Priority Area; located adjacent to MOL, Metropolitan Green Chain SINC and Wandle Valley Regional Park not located within Air Quality Focus Area or any other environmental designation; low flood risk (Flood Zone 1); and no potential for intensification. The site has only recently been granted planning permission so no increase in the volumes of waste managed is likely to take place <p>RECOMMENDED MEASURES TO MITIGATE THE ABOVE IMPACTS IF SITE UPGRADED OR INTENSIFIED</p> <ul style="list-style-type: none"> 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 nearby properties 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; and ensuring the nearby underground electricity cable is neither damaged nor made inaccessible; and the need to undertake an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic. | | | | | | | | | | | | | | | | | |
| | | | | | | | | <u>SUITABILITY SCORE</u> 36 | | | | <u>AVAILABILITY SCORE</u> 25 | | <u>VIABILITY</u> 25 | | <u>TOTAL SITE SCORE</u> 86 | |



| | |
|----------------|-------------------------|
| Type | Treatment with transfer |
| Waste Accepted | HCI + C&D |
| Max throughput | Not published yet |
| Licensed cap. | 350,000 tpa |

13. Conclusions

13.1 This SA Report assesses the extent to which the draft South London Waste Plan (SLWP) Submission Version, when compared to reasonable alternatives, will help to deliver the environmental, economic and social objectives of sustainable development while achieving self-sufficiency in the management of South London's future waste arisings over the plan period from 2021-36. It has been published to inform public consultation on the draft SLWP prior to submission to the government between XXX MONTH and YYY MONTH in accordance with Regulation 19 of the Town and Country Planning Act (Local Planning) Regulations 2012 (Regulation 19 consultation).

13.2 The report has been prepared in line with best practice and meets all of the requirements for the content of sustainability appraisals and strategic environmental assessments (SEA) laid down in government planning practice guidance and the SEA regulations respectively. Accordingly, it provides a comprehensive review of current and future projected waste arisings within the plan area over the next 15 years; existing waste management sites, throughput and capacity; the new London Plan apportionment targets for the management of household and commercial & industrial (C&I) waste; the national, sub-regional and local policy context; the key environmental, social and economic issues likely to be influenced by the plan and the likely impacts of each of the proposed policies and waste sites on the sustainability objectives making up the SA Framework.

13.3 It is soundly based upon the best available local evidence for each of the four boroughs and draws upon the initial analysis of site throughput, capacity and environmental constraints set out in the South London Technical Paper prepared by Anthesis consultants in June 2019, subsequent detailed site appraisal work undertaken by the four boroughs in order to assess site suitability, availability and viability, updated information from site operators and consultation responses.

13.4 The report builds upon the SA Scoping Report published in September 2019 and the previous SA Report on the SLWP Issues and Preferred Options document published in October 2019. As part of the appraisal process, the SA Framework has been refined to take account of comments from the Environment Agency, Natural England and Historic England

13.5 The draft SLWP Submission Version now sets out an amended Vision and revised plan objectives for the management of South London's waste over the next 15 years which better reflect the following 10 strategic and development management policies.

Strategic Policies

- **WP1 Strategic Approach to Household and Commercial and Industrial Waste:**
- **WP2 Strategic Approach to Other Forms of Waste:** This policy has been amended to reflect the move from a shortfall in C&D waste to a small surplus in terms of meeting the target. In addition, the position regarding Excavation Waste has been clarified to reflect the concerns of Surrey County Council (see Representation C18/144) amongst other South East councils.

Development Management Policies

- **WP3 Existing Waste Sites** (unchanged);
- **WP4 Sites for Compensatory Provision** (unchanged);
- **WP5 Protecting and Enhancing Amenity** (unchanged);
- **WP6 Sustainable Design and Construction of Waste Facilities:** This policy has been amended to reflect issues raised by the Environment Agency (see Representation C8/269) so that,

where appropriate, the sustainability credentials of a waste development can be measured against the BRE's 'CEQUAAL'¹ scheme in place of the BREAAAM New Construction scheme;

- **WP7 The Benefits of Waste** (unchanged);
- **WP8 New Development Affecting Waste Sites:** This is a new policy to reflect the requests from SUEZ (see Representation C20/10) and Veolia (see Representation C19/272). It sets out the principle of new development needing to take mitigation measures rather than the established uses. This principle is also part of national and regional planning policy:
- **WP9 Planning Obligations** (unchanged);
- **WP10 Monitoring and Contingencies:** This is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies

13.6 The SA Matrix in Section 12 demonstrates that proposed Policies WP1-WP10 for inclusion in the new SLWP 2021-36 (Option 1), are likely to have significantly stronger beneficial impacts on the majority of sustainability objectives making up the SA Framework compared to either carrying forward the existing strategic approach in the current SLWP 2012 (Option 2a) or seeking to identify new waste sites in addition to existing safeguarded sites (Option 2b). The likely impacts of *not* proceeding with a new waste plan and therefore deleting the policies of the existing SLWP 2012 are shown to be overwhelmingly negative.

13.7 While Option 1 essentially carries forward the same overall strategic approach which was identified and assessed as the 'preferred option' in the previous SA Report on Issues and Preferred Options, the SA Matrix demonstrates that the two newly introduced policies (WP8 'Strategic Approach to Other Forms of Waste' and WP10 'Monitoring and Contingencies') and the changes made to Policies WP2 'Strategic Approach to Other Forms of Waste' and WP6 'Sustainable Design and Construction of Waste Facilities' will significantly improve the plan by making a greater contribution to sustainability objectives. Amongst other things, this outcome reflects the move from a shortfall in C&D waste to a small surplus against forecast arisings in 2036.

13.8 Overall, the most important sustainability benefits of the draft SLWP Submission Version include:

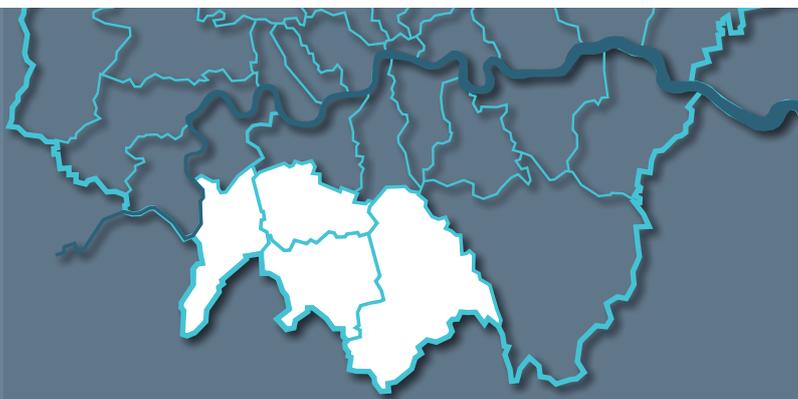
- achieving **net self-sufficiency** within South London by providing sufficient sites and waste management facilities to both meet (but not exceed) the new apportionment targets for household and C&I waste and to manage future C&D waste arisings over the plan period to 2036; eliminating the need to identify additional waste sites and by developing more efficient, effective and cleaner management practices in partnership with the waste industry;.
- promoting an environmentally **sustainable strategic approach** to managing South London's waste arisings by optimising and intensifying the capacity of existing waste management sites; avoiding the uptake of additional employment land for waste management operations where appropriate; and minimising HGV movements and other potentially adverse environmental impacts associated with waste management activities by promoting complementary uses such as manufacturing from waste;

¹ the CEEQUAL scheme (Civil Engineering Environmental Quality Assessment and Awards Scheme) is an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects developed by the BRE. Further details are available at <https://www.ceequal.com/>

- promoting **sustainable transport** objectives by eliminating the need to identify additional waste management sites or 'broad locations' in South London (thus reducing adverse impacts on the strategic/ local road network arising from HGV movements); and by intensifying of existing waste management uses on suitable sites or co-locating complementary uses in industrial areas;
- minimising **air pollution** and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste-related HGV movements on the strategic/ local road network; developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and avoiding any further deterioration in air quality particularly within 'Air Quality Focus Areas';
- moving waste management practices further up the waste hierarchy by promoting **waste re-use, recycling and recovery** towards achieving the Mayor's targets of 65% recycling of municipal waste by 2030 and zero biodegradable or recyclable waste landfilled by 2026;
- helping to secure the transition to a **circular economy** within south London and keeping products and materials at their highest use for as long as possible by encouraging the co-location of complementary uses such as secondary material processing facilities and supporting manufacturing from waste; and
- promoting **local employment, South London's economy and the competitiveness of the waste sector** by safeguarding employment land and floorspace within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses (this is particularly important in Sutton, where the strategic demand for industrial, logistics and related uses is anticipated to be the strongest).

13.9 Stakeholder feedback on both the draft plan and this SA Report arising from the Regulation 19 consultation stage will inform the preparation of the final SLWP for submission to the government. The final version of the SA Report, together with the outcome of Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) screening will be considered by the Inspector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.

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



South London Waste Plan



Sustainability Appraisal (SA) Appendices
 incorporating Strategic Environmental Assessment (SEA)
 on Draft for Submission to Government

September 2020

Appendix 1

EQUALITIES IMPACT ASSESSMENT (EqIA)

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

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1. Background

Introduction

1.1 This Equalities Impact Assessment (EqIA) report assesses the impacts of each of the proposed waste policies included in the draft South London Waste Plan (SLWP) Submission Version on the key equality target groups within the four partner boroughs. It has been published alongside the Sustainability Appraisal (SA) Report to inform public consultation on the draft SLWP between xxx MONTH and YYY MONTH prior to the formal submission of the plan to the Secretary of State for Housing, Communities and Local Government (DHCLG) for Examination-in-Public. AsThe impacts of

1.2 As with the SA Report, the impacts of the proposed SLWP Submission Version (Option 1) have been assessed alongside the following strategic alternatives:

- **Option 1: Proposed Plan (Meet Apportionment⁷³)** consists of the proposed Policies (WP1-WP10) and site designations which have been taken forward in the draft SLWP Submission Version;
- **Option 2: Existing Plan (Exceed Apportionment)** would carry forward the existing waste policies and site designations in the current SLWP 2012 unchanged; and
- **Option 3 ‘Do-Nothing’ scenario** considers the impacts of allowing the policies and designations of the existing plan to expire in 2021 and not be replaced by a new plan.

1.3 Option 2 (Existing Plan) is further divided, where relevant, into the following two sub-options for the purpose of appraising the alternative strategic approaches to managing Household and C&I waste and other forms of waste respectively under Policies WP1 and SWP2. However, both involve significantly exceeding the new London Plan apportionment and the forecast level of C&D waste arisings over the plan period to 2036:

- **Option 2a: Existing Plan (Exceed Apportionment)** would carry forward the existing policies and existing site designations in the current SLWP 2012 unchanged.
- **Option 2b: Additional Sites (Exceed Apportionment)** would carry forward the existing policies in the current SLWP 2012 unchanged while identifying new waste sites in addition to existing safeguarded sites.

1.4 In considering the impacts of Option 1 (Proposed Plan), the potential benefits of the newly introduced policies (WP8 and WP10) and the changes made to Policies WP2 and WP6 on equalities target groups have also been assessed in relation to the draft policies put forward at the issues and preferred options stage.

1.5 While in many respects, the proposed SLWP Policies WP1-WP10 (Option 1) carry forward and build upon the preferred policies in the Issues and Preferred Options document, there are number of differences in terms of the proposed strategic approach, primarily (i) the commitment in draft Policy WP1 not to permit any new waste management sites unless it is for compensatory provision; and (ii) removing the broad industrial areas currently identified in Schedule 2 of the existing SLWP 2012 from waste designation.

1.6 This report updates the previous EqIA Report on SLWP Issues and Preferred Options published for public consultation between 31 October and 22 December 2019.

⁷³ Policy SI 8 of the ‘Intend to Publish’ London Plan (December 2019) sets out new borough apportionment targets for the management of household and commercial & industrial (C&I) waste over the period of the London Plan to 2041. Based on this trajectory, the amount of household and C&I waste which needs to be managed within the four South London boroughs in 2036 is 929,750 tonmnes per annum SA Report on South London Waste Plan Submission Version: Appendices (September 2020)

What is an EqIA?

1.7 An EqIA is defined by the Equality and Human Rights Commission⁷⁴ as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making.

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

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

1.10 This document constitutes the full stage 2 assessment.

Legislation

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

Race Relations (Amendment) Act 2000

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

Disability Discrimination (Amendment) Act 2005

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

Equality Act 2006

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

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

1.15 This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their

⁷⁴ see <http://www.equalityhumanrights.com>

existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

Equality Act 2010

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

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

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

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

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

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

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

LB Croydon Equality Policy 2016-2020

1.20 Croydon's Equality Policy 2016-20 and the supporting Opportunity and Fairness Plan sets out the following aims and objectives.

Aims

The council acknowledges its statutory equality duty as a Public Sector employer under s149 of the Equality Act 2010. In particular, whilst we exercise our functions we aim to

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

Objectives

Employment

- to increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.

Child poverty

- to reduce the rate of child poverty especially in the six most deprived wards.

Attainment

- to improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards.

Community safety

- to increase the percentage of domestic violence sanctions;
- to increase the reporting and detection of the child sexual offences monitored; and
- to reduce the number of young people who enter the youth justice system.

Social isolation

- to reduce social isolation amongst disabled people and older people.

Community cohesion

- to improve the proportion of people from different backgrounds who get on well together.

Health

- to reduce differences in life expectancy between communities.

RB Kingston Equality & Community Cohesion Strategy 2016-2020

1.21 Kingston's Equality and Community Cohesion Strategy 2016-20 sets out the following aims. .

Aim

As one of the largest employers and service providers in the area, the Royal Borough of Kingston is committed to eliminating discrimination in all its forms and working to a cohesive community that respects differences and values human rights. We will work to challenge discrimination against age, ethnicity, gender, transgender people, disabled people, individuals who practise a religion and those who do not have any religious beliefs or practice other beliefs, people with specific sexual preference and people across all levels of economic status. We recognise that some individuals suffer from multiple discrimination and we will work together with our partners to alleviate this.

Objectives

Knowing our community

- to appreciate the changing nature of the population of the borough;
- to better understand who lives in the borough and be aware of their needs;
- to improve on how to gather, use and share the information appropriately.

Place Shaping, leadership, partnership and organisational commitment

- to provide strong leadership and ensure equality, diversity and community cohesion are embedded throughout the council by politicians and senior management;
- to engage and influence our partners to work together to achieve the equality objectives by setting clear equality priorities that support each other;
- to ensure that the procured services meet our equality obligations;
- to take responsibility for the delivery of equality and community cohesion work and to manage and monitor its performance more effectively; and
- to continue to improve on the equality impact assessment process and setting of targets

Community engagement and satisfaction:

- to improve the involvement and engagement of the diverse communities within the borough;
- to ensure the communities feel their views are taken into account and to provide feedback;
- to challenge negative views and promote more cohesive communities;
- to make communities feel secure and safe in our diverse society.

Responsive services and customer care:

- to ensure that everyone entitled to services is able to access them;
- to make our service provision fair, equitable, transparent and consistent;
- to understand the impact changes can have on the lives of service users, their family and carers;
- to improve our communication and accessibility for all services users;
- to encourage feedback, compliments as well as complaints, and respond to them;
- to regularly monitor equality and cohesion objectives at departmental management meetings
- to carry out equality monitoring of our service users and analyse the data; and
- to act on any adverse trends that are identified

A modern and diverse workforce:

- to have employment policies and practices that are fair, flexible and address equality issues;
- to ensure that employees feel supported at work and that their experiences are positive;
- to strive for a workforce that represents the community it serves;
- to provide all employees with opportunities to engage in training and learning;
- to make sure that every employee understands and engages in the council's equality duties ;
- to carry out equality monitoring and encourage more self-declaration on all equality strands.

LB Merton Equality and Community Cohesion Policy 2017-2021

1.22 Croydon's Equality Policy 2016-20 and the supporting Opportunity and Fairness Plan sets out the following aims and objectives.

Aims

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

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

Equality objectives

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

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

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

1.24 It sets out the following Core Objectives:

Objective 1

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

Objective 2

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

Objective 3

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

Objective 4

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

2. Equalities Target Groups in South London

Equalities target groups

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

Table 2.1: Equalities Target Groups

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

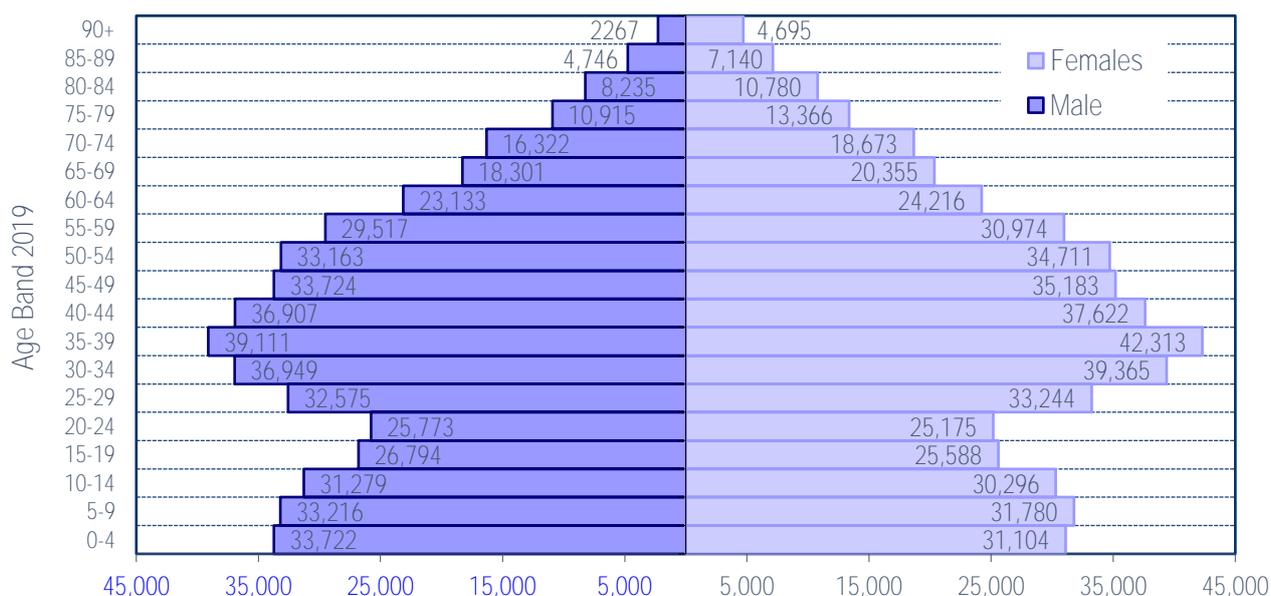
Women, older people, young people and children

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

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

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

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



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

Disabled people

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

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

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

Black and minority ethnic (BME) people

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

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

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

Faith groups

Table 2.5: Religion for SLWP boroughs and plan area 2019

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

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

Social deprivation

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

| | Social deprivation ranking compared to the 317 areas in England ⁷⁵ | | |
|----------|---|--|----------------|
| | IMD 2015 ⁷⁶ | IMD 2019 | Change 2015-19 |
| Croydon | 95 th | 108 th most deprived in England | ↓ |
| Kingston | 270 th | 273 rd most deprived in England | ↓ |
| Merton | 209 th | 213 th most deprived in England | ↓ |
| Sutton | 211 th | 226 th most deprived in England | ↓ |

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

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

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

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

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

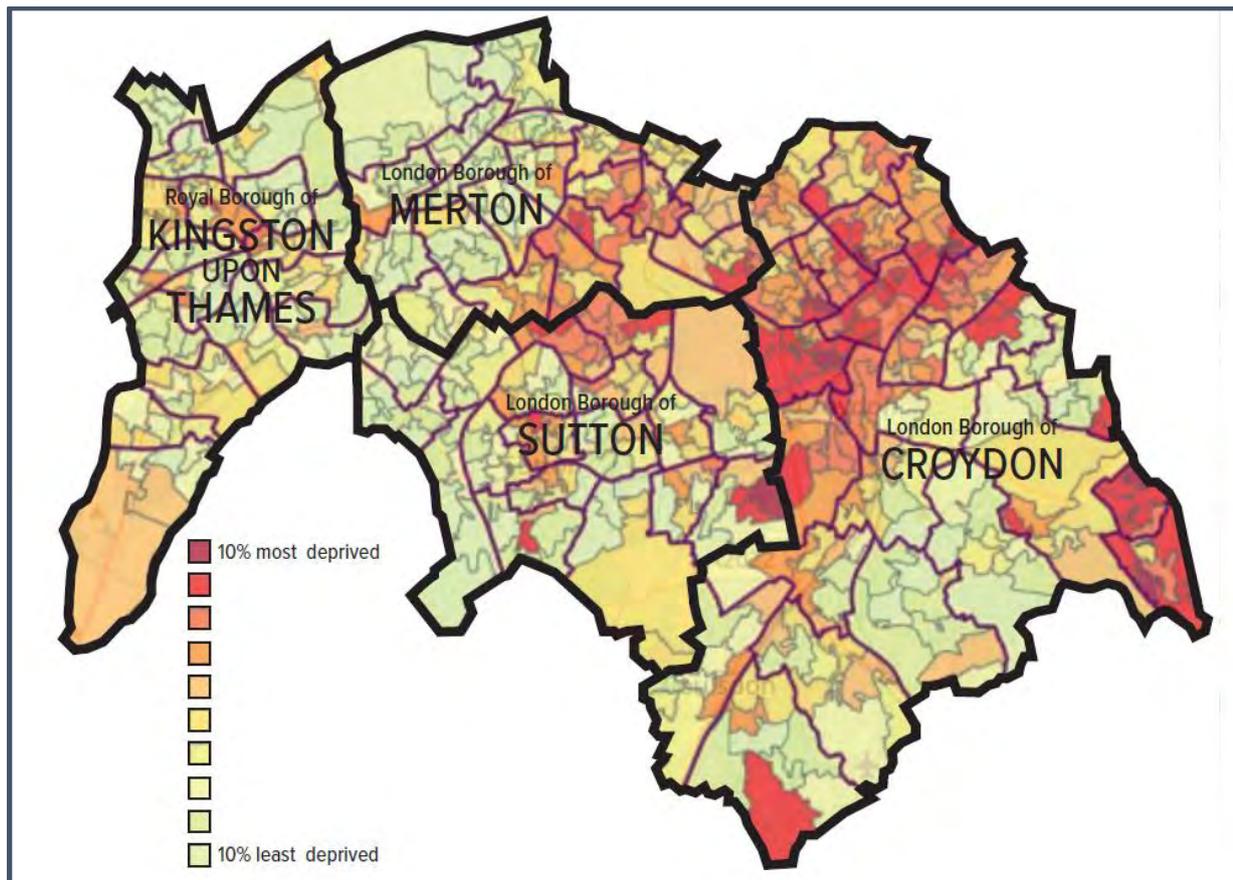
| | IMD 2019 – Ranking of average score | | | |
|----------|-------------------------------------|-----------------------------------|------------------------------------|------------------------------------|
| | LSOAs ranked in 10% most deprived | LSOAs ranked in 20% most deprived | LSOAs ranked in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

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

⁷⁵ based on IMD 2019 'rank of average score' (1st = most deprived and 317th = least deprived)

⁷⁶ 2015 data recast to 2019 lower tier (district) authorities following boundary changes

Figure 2.2: Index of Multiple Deprivation (IMD 2015) map for SLWP area⁷⁷



⁷⁷ showing lower level super output areas (LSOAs) ranked within each decile (based on national ranking)

3. Equalities Impact Assessment

EqIA criteria

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

Table 3.1 EqIA criteria

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

EqIA Matrix and Scoring system

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

Table 4.2: Scoring system for use in EqIA screening

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

EqIA MATRIX: IMPACTS OF PROPOSED SOUTH LONDON WASTE PLAN POLICIES ON EQUALITY GROUPS

| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|--|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP1: STRATEGIC APPROACH TO HOUSING AND COMMERCIAL AND INDUSTRIAL WASTE (unchanged) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP1 - SAFEGUARD EXISTING SITES ONLY (MEET APPORTIONMENT) | | | | | | | | |
| (a) 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. | | | | | | | | |
| (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2020 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. | | | | | | | | |
| (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3). | | | | | | | | |
| (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3). | | | | | | | | |
| | + | + | ++ | ++ | ++ | + | + | ++ |
| OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS (EXCEED APPORTIONMENT) | | | | | | | | |
| Carry forward Policy WP1 from existing SLWP 2012 | ? | ? | + ? | + ? | + ? | ? | + ? | + ? |
| OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES (EXCEED APPORTIONMENT) | | | | | | | | |
| | X | X | XX | XX | XX | X | XX | XX |
| OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP1 to expire in 2021 | | | | | | | | |
| | X | X | XX | XX | XX | X | XX | XX |
| Proposed Policy WP1 will have beneficial impacts on older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation by: <ul style="list-style-type: none"> minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or 'broad locations' in South London over the plan period; minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality; safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as 'broad locations' for waste management uses; ensuring that waste facilities are fully adapted to climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS Older people, young people, disabled people and people with a limiting long term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements. The most significant adverse effects include air pollution and associated health impacts (e.g. respiratory disease) resulting from nitrogen dioxide (NO2) and particulates particularly in the vicinity of major roads and residential areas. These groups are also disproportionately affected by climate change impacts. There will be less significant benefits for Women; BME/Faith groups; LGTB people and Gypsies & Travellers and these will be broadly in line with those experienced by the wider community. | | | | | | | | |
| POLICY WP2: STRATEGIC APPROACH TO OTHER FORMS OF WASTE (amended) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP2 - SAFEGUARD EXISTING SITES ONLY | | | | | | | | |
| (a) The boroughs of the SLWP will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity. | | | | | | | | |
| (b) During the lifetime of the plan, the boroughs of the SLWP will seek to meet the forecast arisings for C&D waste of managing 420,275 tpa [to] 2036. The boroughs of the SLWP will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (Policy WP3). | | | | | | | | |
| (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5. | | | | | | | | |
| (d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste. | | | | | | | | |
| (e) ... improvements to the operation of and the enhancement of the environment of the Hogsmill and the Beddington STW will be supported, | | | | | | | | |
| | + | ++ | ++ | ++ | ++ | + | ++ | ++ |
| OPTION 2A: EXISTING PLAN - SAFEGUARD EXISTING SITES AND ALL INDUSTRIAL AREAS Carry forward Policy WP2 from existing SLWP 2012 and allow proposals for C&D waste together with all 'other' waste streams on existing sites and all industrial areas where an identified need. | | | | | | | | |
| | + ? | + ? | + ? | + | + | + ? | + | + |
| OPTION 2B: SAFEGUARD EXISTING SITES AND IDENTIFY NEW SITES | | | | | | | | |
| Allow proposals for C&D waste together with all 'other' waste streams on both existing sites and newly identified sites where there is an identified need. | + ? | + ? | + ? | + | + | + ? | + | + |
| OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP2 expires in 2021 | | | | | | | | |
| | X | XX | XX | XX | XX | X | XX | XX |
| Proposed Policy WP2 will have significant beneficial impacts (++) for older people; young people and children; disabled people; and people with a limiting long-term illness by: <ul style="list-style-type: none"> ensuring that any new sites for C&D waste are for compensatory provision only, thus helping to minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues that would otherwise arise from additional HGV movements; not supporting the development of new sites (either transfer or management) for radioactive waste, agricultural waste and hazardous waste; ensuring that additional C&D waste capacity can only be delivered through the intensification of existing sites and ensuring that all new or upgraded waste management facilities for the treatment of other forms of waste are enclosed. Enhancing the environment of the Hogsmill Sewage Treatment Works and the Beddington STWs Older people, young people and children, disabled people and people with a limiting long term illness are disproportionately affected by the adverse effects of air pollution, dust, noise/disturbance, community severance and road safety issues arising from increased HGV movements to and from waste sites. The most significant effects include air pollution and associated health impacts (e.g. asthma and respiratory disease) resulting from elevated levels of nitrogen dioxide (NO2) and particulates (PM10 and PM2.5) particularly in the vicinity of major roads, residential areas, schools and Air Quality Focus Areas. These groups are also disproportionately affected by a number of impacts potentially arising from the construction and operation of waste sites, particularly within smaller, more constrained employment locations where there are residential areas and other vulnerable land-uses nearby. For these reasons, avoiding new C&D sites is appraised to have significant beneficial effects | | | | | | | | |

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| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|--|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP3: EXISTING WASTE SITES (unchanged) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP3 | | | | | | | | |
| <u>Safeguarding</u> | | | | | | | | |
| (a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only. | | | | | | | | |
| <u>Intensification</u> | | | | | | | | |
| (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. | | | | | | | | |
| <u>Safeguarding Compensatory Provision</u> | | | | | | | | |
| (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. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only. | | | | | | | | |
| (d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted. | | | | | | | | |
| <u>Safeguarding Waste Hierarchy</u> | | | | | | | | |
| (e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to same level in hierarchy as prior to development. | | | | | | | | |
| | + | + | ++ | ++ | ++ | + | + | ++ |
| OPTION 2: EXISTING PLAN | | | | | | | | |
| Carry forward Policies WP3 & WP4 from SLWP 2012. | | | | | | | | |
| | ? | ? | + | + | + | ? | ? | + |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | |
| Allow existing Policies WP3 and WP4 to expire | | | | | | | | |
| | ? | ? | X | X | X | ? | ? | X |
| <p>Proposed Policy WP3 on Existing Waste Sites would have beneficial impacts for older people; young people and children; disabled people; and people with a limiting long-term illness by:</p> <ul style="list-style-type: none"> safeguarding existing waste sites within South London for waste uses only, thus avoiding the need for new sites to be developed unless this is for compensatory provision. As discussed above under Policies WP1 and WP2, this will help to minimise local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues that would otherwise arise from additional HGV movements and the construction and operation of new sites in less suitable locations; protecting the quality of the environment, particularly for vulnerable receptors, by avoiding the adverse impacts of noise, vibration, dust, soil contamination, odour and water pollution during both the construction and operational phases that would otherwise arise from the development of new waste management sites. It should be noted that any adverse effects arising from an existing operational waste site should have already been mitigated to acceptable levels through a construction management plan, planning conditions and via the waste permitting regime. ensuring that any development on an existing safeguarded 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.; minimising the potentially adverse effects on human health and quality of life, particularly within areas affected by social deprivation, by minimising the adverse impacts of additional HGV movements, air pollution, dust and noise particularly for vulnerable groups, such as the young, the elderly and people suffering from respiratory issues, that would otherwise arise from the development of new waste management sites within south London, either to exceed the apportionment for South London and/or to compensate for any loss of capacity outside the plan area. The current or future effects of each existing safeguarded waste site on equalities target groups will naturally vary depending on the particular circumstances of each site and are therefore subject to a degree of uncertainty (?). Key issues include access to and from the strategic road network, the future potential for intensification or upgrading the site, the presence of vulnerable neighbouring land uses, site constraints and the extent to which the site is compliant with planning conditions or environmental permitting.. | | | | | | | | |

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| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|---|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP4: SITES FOR COMPENSATORY PROVISION (unchanged) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP4 Proposals for new waste sites to provide compensatory provision should: (a) Demonstrate that the site is capable of providing suff. compensatory capacity. (b) Be located on sites: (i) within SILs or Locally Significant Industrial Location; (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 in FZss 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 (e.g. Green Belt or MOL); (ii) are located more than 100 metres from open space; (iii) are located outside Groundwater Source Protection Zones (i.e. 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 SRN; (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; or (viii) offer opportunities to accommodate various related facilities on a single site. | + | + | ++ | ++ | ++ | + | + | ++? |
| OPTION 2: EXISTING PLAN Carry forward Policy WP5 in existing SLWP | +? | + ? | ++? | ++? | ++? | + ? | + ? | +? |
| OPTION 3: 'DO-NOTHING' SCENARIO Existing Policy WP5 expires in 2021 | x? | x? | xx | xx | xx | x? | x? | xx? |
| Proposed Policy WP4 on Sites for compensatory provision would have beneficial impacts for women, older people; young people; disabled; and people with a limiting long-term illness by: <ul style="list-style-type: none"> updating criteria to mitigate the potentially adverse impacts of waste sites which have been proposed for compensatory provision, thereby minimising disproportionate impacts upon certain equalities target groups. These include not permitting hazardous waste facilities within Flood Zones 3a or 3b; avoiding adverse effects on on-site or off-site flood risk and favouring sites which are located more than 100 metres from open space; located outside Groundwater Source Protection Zones; have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water: provide easy access for staff to cycle or walk; have direct access to the strategic road network; and have no Public Rights of Way crossing the site; and giving consideration to the potentially negative cumulative effects of a concentration of waste uses in one area and balancing these against the advantages of co-location Proposed Policy WP4 will have less significant beneficial effects on Women; BME/Faith groups; LGTB and Gypsies and Travellers broadly in line with those experienced by the wider community. | | | | | | | | |

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| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|---|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP5: PROTECTING AND ENHANCING AMENITY (unchanged) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP5 | | | | | | | | |
| (a) Developments for compensatory/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 [site] where unloading, loading, storage and processing takes place should be in 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 and the possibility of using sustainable modes of transport for incoming and outgoing materials (viii) The safety and security of the site (ix) Odour, litter, vermin and birds; and, (x) The design of the facility, particularly <ul style="list-style-type: none"> • 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 | + | + | ++ | ++ | ++ | + | + | ++? |
| OPTION 2: EXISTING PLAN Carry forward Policy WP7 in existing SLWP 2012 | | | | | | | | |
| | +? | +? | +? | +? | +? | +? | +? | +? |
| OPTION 3: 'DO-NOTHING' SCENARIO Allow existing Policy WP7 to expires in 2021 | | | | | | | | |
| | x? | x? | xx | xx | xx | x? | x? | x |
| <p>Proposed Policy WP5 on Protecting & Enhancing Amenity would have beneficial impacts for older people; young people; disabled people; people illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> • ensuring that any adverse impacts arising from compensatory or intensified waste developments are designed and managed to achieve levels that will not significantly adversely affect people and the environment and by requiring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building. • requiring that planning applications are accompanied by Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. All of these measures will help to mitigate potential impacts that would otherwise have disproportionate impacts upon the above equalities target groups. • since adverse impacts on human health and the open environment, including air pollution, will have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within areas affected by social deprivation, the following policy requirements will help to mitigate such impacts (i) requiring that all parts of a proposed facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building (ii) requiring submission of an Air Quality Impact Assessment, a Noise Assessment, a Transport Assessment, a Travel Plan, an Access Strategy, details of highway safety measures and an assessment identifying potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, together with appropriate mitigation measures. The requirement to provide details of appropriate measures for protecting Public Rights of Way will also be beneficial <p>Proposed Policy WP4 will have less significant benefits for Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers in line with those experienced by the wider community</p> | | | | | | | | |

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| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|--|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP6: SUSTAINABLE DESIGN AND CONSTRUCTION OF WASTE FACILITIES (amended) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP6 | | | | | | | | |
| (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL 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 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 line with 2020 London Plan Policy SI2; | | | | | | | | |
| (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2020 London Plan Policy GG6, particularly with regard to increased flood risk, 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 2020 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 waste on site; and, | | | | | | | | |
| (vi) protect, manage and enhance local habitats and biodiversity | | | | | | | | |
| OPTION 2: EXISTING PLAN | | | | | | | | |
| Carry forward Policy WP6 from existing SLWP 2012 | + | + | + | + | + | + | + | + |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | |
| Allow existing Policy WP6 to expire in 2021 | XX | X? | XX | XX | XX | X? | X? | XX |
| <p>Proposed Policy WP6 on Sustainable design and construction would have beneficial impacts for older people; women, young people and children; disabled people; people with a limiting long-term illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> requiring all waste developments to achieve BREEAM 'Excellent', to promote circular economy principles; and to incorporate appropriate flood risk mitigation and SuDS measures in order to manage risk both to and from the development over its planned lifetime; incorporating best practice sustainable design and construction measures in line with BREEAM 'Excellent' aimed at promoting inclusive environments and reducing crime, fear of crime and anti-social behaviour, thus having particular benefits in terms of women, young people and children and older people further reducing disproportionate impacts on certain equalities target groups by helping to minimise air pollution, making more efficient use of resources and reducing the lifecycle impacts of construction materials and demonstrating this in a Circular Economy Statement ensuring that all parts of a proposed waste facility where unloading, loading, storage and processing takes place is within a fully enclosed and covered building in line with draft Policy WP5; requiring all new or upgraded waste facilities to be fully adapted and resilient to the future impacts of climate change including flooding, summer heatwaves, contribution to the urban heat island (UHI) effect and drought. It is well established that climate change impacts, including flooding and heatwaves, have a disproportionate impact upon some equalities target groups such as the young, the elderly and people suffering from respiratory diseases avoiding negative environmental impacts (e.g noise, air pollution, health impacts, community severance, amenity and quality of life) associated with waste management practices towards the bottom of the waste hierarchy (e.g. landfill and incineration) and associated transport movements which might disproportionately affect areas of social deprivation, thus having particular benefits for BME people, certain faith groups, disabled people, older people and young people and children. <p>Proposed Policy WP6 will have less significant beneficial effects on BME/Faith groups; Lesbians, gays, bisexuals and transgender (LGBTB) and Gypsies and Travellers and these are expected to be broadly in line with those experienced by the wider community.</p> | | | | | | | | |

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| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|---|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP7: THE BENEFITS OF WASTE (unchanged) | | | | | | | | |
| OPTION 1: PROPOSED PLAN - POLICY WP7 | | | | | | | | |
| (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. | | | | | | | | |
| | ++ | + | ++ | ++ | ++ | + | + | ++? |
| OPTION 2: EXISTING PLAN | | | | | | | | |
| Carry forward Policy WP8 from existing SLWP 2012. | + | + | + | + | + | + | + | + |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | |
| Allow existing Policy WP8 to expire in 2021. | X | ? | X | X | X | ? | ? | X |
| <p>Proposed Policy WP7 would have beneficial impacts for older people; women, young people; disabled people; people with a limiting long-term illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> requiring proposals for the intensification of existing waste management sites to result in sub-regional job creation and to maximise social benefits, including skills, training, and apprenticeship opportunities for the local workforce in South London, particularly in economically deprived areas; minimising air pollution and associated impacts on human health, particularly amongst the young, the elderly, people with respiratory problems and within areas affected by social deprivation, by (i) ensuring that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place); and (ii) not supporting the development of additional Energy from Waste (EfW) facilities ensure that proposals for the intensification of existing waste management sites or compensatory provision move waste management practices up the waste hierarchy (i.e. by ensuring that waste that can be recycled is not used as fuel; waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place) supporting waste minimization and thus avoiding the potential negative environmental impacts (e.g noise, air pollution, health impacts, community severance, amenity and quality of life) associated with waste management facilities and HGV movements which might disproportionately affect equalities target groups <p>Draft Policy WP6 will have less significant beneficial effects on BME/Faith groups; LGT) and Gypsies & Travellers broadly in line with those experienced by the wider community</p> | | | | | | | | |
| POLICY WP8: NEW DEVELOPMENT AFFECTING WASTE SITES (new policy) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP8 | | | | | | | | |
| (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them. | | | | | | | | |
| (b) Where new development is proposed that maybe affected by an existing waste site, an extant scheme, a permission for additional capacity or asite developed for compensatory provision, the applicant should: | | | | | | | | |
| (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision. | | | | | | | | |
| (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations. | | | | | | | | |
| | + | + | + | + | + | + | + | + |
| OPTION 2: EXISTING PLAN | | | | | | | | |
| Not applicable. | n/a | | | | | | | |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | |
| Do not include NEW POLICY W8 in draft SLWP for submission. | ? | ? | X | X | X | ? | ? | X |
| <p>Newly proposed Policy WP8 on 'New development affecting waste sites' is considered have some potentially beneficial impacts for older people; young people; disabled people; people with a long-term illness; and people affected by social deprivation by:</p> <ul style="list-style-type: none"> ensuring that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and on vulnerable groups. Since the potential adverse impacts of waste operations and associated HGV movements, including air pollution, dust, noise, water pollution, surface water run-odd, light pollution and impacts on the local road network are likely to have a disproportionately negative impact upon certain equalities target groups such as the elderly, the young, people suffering from long-term health problems such as respiratory disease and people living within socially deprived areas areas, this new policy is expected to have a positive impact on the corresponding equalities appraisal criteria. ensuring that appropriate mitigation measures are implemented as part of the design and layout of newly proposed 'sensitive' developments in the vicinity of operational waste sites from the earliest stages of project planning and design and as part of the ongoing and future management of the site (secured through planning conditions and obligations) <p>However, proposed Policy WP8 is considered to have less significant benefits specifically for Women; BME/Faith groups; Lesbians, gays, LGTB and Gypsies and Travellers (i.e. in line with those experienced by the wider community)</p> | | | | | | | | |

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| | IMPACTS ON EQUALITY TARGET GROUPS | | | | | | | |
|---|-----------------------------------|----------------------|--------------|------------------------------|---|--|---------------------------|---|
| | Women | BME/ Faith groups | Older people | Young people and children | Disabled people and limiting long-term illness | Lesbians, gays bisexuals and transgender | Gypsies and Travellers | People Affected by Social Deprivation |
| POLICY WP9: PLANNING OBLIGATIONS (unchanged – formerly Preferred Policy WP8) | | | | | | | | |
| OPTION 1: PREFERRED POLICY | | | | | | | | |
| 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. | + | + | + | + | + | + | + | + |
| OPTION 2: EXISTING PLAN | | | | | | | | |
| Carry forward Policy WP8 from SLWP 2012. | + | + | + | + | + | + | + | + |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | |
| Allow existing Policy WP8 of existing SLWP 2012 to expire in 2021. | ? | ? | ? | ? | ? | ? | ? | ? |
| Proposed Policy WP9 on Planning Obligations would have beneficial impacts for promoting equalities, accessibility and social inclusion within south London by potentially providing for access and highway improvements; environmental enhancement measures; flood risk compensation works; off-site monitoring of atmospheric emissions and the water environment; provision and management of off-site or advance planting and screening measures and job brokerage, training and skills to encourage local employment opportunities. By minimising the adverse impacts of vehicles routing on the local road network, traffic management measures delivered through planning obligations will have potential benefits for most equalities target groups, in particular young people and children, disabled people and the elderly by steering HGV movements away from local and residential roads. | | | | | | | | |
| POLICY WP10: MONITORING AND CONTINGENCIES (new policy) | | | | | | | | |
| OPTION 1: PROPOSED POLICY WP10 | | | | | | | | |
| The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring. | + | + | ++ | ++ | ++ | + | + | ++ |
| OPTION 2: EXISTING PLAN | | | | | | | | |
| Not applicable. | n/a | | | | | | | |
| OPTION 3: 'DO-NOTHING' SCENARIO | | | | | | | | |
| Do not include NEW POLICY W10 in draft SLWP for submission. | X | X | XX | XX | XX | X | X | XX |
| Newly proposed Policy WP10 is considered to have potentially beneficial impacts for most equalities target groups within South London by ensuring that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on an annual basis and by ensuring that consultation will take place between the partner boroughs to determine whether any of the contingency actions listed in Appendix 1 of the draft SLWP need to be taken. The ongoing monitoring and review of the following indicators and the partner Boroughs' stated commitment to take contingency action where necessary will therefore help ensure that the various beneficial impacts identified above in this EqIA matrix for waste Policies WP1 to WP9 can be delivered: | | | | | | | | |
| <ul style="list-style-type: none"> Indicator 1: Household and Commercial waste managed; Indicator 2: Construction and Demolition Waste Managed (for Policy WP2); Indicator 3: Radioactive, Agricultural and Hazardous Waste Treated (for Policy WP2); Indicator 4: Existing Waste Sites Safeguarded (for Policy WP3 & WP4); Indicator 5: Compensatory or Intensified Sites with Fully Enclosed Covered Building (possible introduction of design guidance) (for Policy WP5b); Indicator 6 Development on Green Belt, Metropolitan Open Land and Open Space (for Policy WP5c); Indicator 7: Development on Nationally, Regionally or Locally Designated Nature Conservation Areas (for Policy WP5(c)) Indicator 8: Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas (for Policy WP5c); Indicator 9: Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)(for Policy WP5c); and Indicator 10: Development Achieving BREEAM and/or CEEQUAL 'Excellent' Rating(for Policy WP6); and Indicator 11: Development involving Energy from Waste (for Policy WP7). | | | | | | | | |

4. Conclusions

EqIA Findings

4.1 The outcome of EqIA set out in this report show that the proposed policies included in the draft SLWP Proposed Submission document are expected to have a number of beneficial impacts on all target equality groups identified for the purposes of this assessment and are not generally expected to lead to adverse discriminatory impacts upon any particular equalities target group.

4.2 In the absence of appropriate planning policies and environmental controls aimed at (a) avoiding the need for additional waste facilities to be constructed in unsuitable locations, for example by maximising the efficient operation and throughput of existing waste sites and driving waste management practices further up the waste hierarchy; and (b) mitigating the potentially adverse environmental impacts arising from the construction and operation of compensatory or upgraded waste facilities and associated HGV movements for example by enclosing potentially polluting operations such as skip transfer, it is well established that older people, young people and children, disabled people (including people with a limiting long term illness) and people affected by social deprivation are likely to be disproportionately affected. For waste sites in close proximity to residential areas and other vulnerable land-uses, the most significant adverse effects include increased levels of air pollution in the form of nitrogen dioxide (NO₂) and particulates (PM10/PM2.5), associated health impacts (e.g. respiratory disease), dust, noise/disturbance, community severance and road safety issues. Certain equalities target groups are more strongly represented within those parts of the plan area affected by higher levels of social deprivation, which in turn tend to be in closer proximity to existing waste management facilities and industrial locations

4.3 In addition, where appropriate policy measures are not taken to address both the causes of climate change by reducing CO₂ emissions from waste operations and associated HGV movements) and to ensure that all proposed waste facilities are fully adapted to the impacts of climate change including summer heatwaves, urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS, these groups are also likely to be disproportionately affected.

4.4 Overall, the EqIA matrix shows that the proposed approach to the management of future waste arisings in South London set out in the draft SLWP (**Option 1**), is considered to have positive impacts on most equalities target groups by comparison with both **Option 2: Existing Plan (Exceed Apportionment)** and Option 3 **‘Do-Nothing’ scenario**. More specifically, the appraisal indicates that proposed Policies WP1-WP10 are likely to have particular benefits for **older people; young people; disabled people; people with a limiting long-term illness and people affected by deprivation** by:

- minimising local air pollution, associated health impacts, traffic congestion, noise, community severance, road safety issues arising from HGV movements to and from waste management facilities by eliminating the need to identify additional waste management sites or ‘broad locations’ in South London over the plan period;
- minimising local air pollution and associated health impacts arising from the construction and operation of waste management facilities by developing more efficient and cleaner waste management practices, ensuring that all new or upgraded waste management facilities are fully enclosed; and by avoiding any further deterioration in air quality;
- safeguarding employment land within strategic industrial locations (SIL) and other established industrial areas by no longer identifying these as ‘broad locations’ for waste management uses
- ensuring that waste facilities are fully adapted to climate change including summer heatwaves,

- urban heat island (UHI) effect, flooding and drought by promoting green infrastructure and SuDS.
- providing a greater degree of certainty about the nature and extent of planned waste related developments would serve to reassure local communities and equalities target groups in particular over what to expect. There are therefore be particular benefits for BME people, certain faith groups, older people and young people, who are more likely to live within socially deprived areas already affected by a poor quality environment and in close proximity to potential waste sites;
 - promoting the circular economy and the co-location of complementary waste facilities to support manufacturing-from-waste with waste management facilities has potentially significant benefits for certain equalities target groups, in particular certain faith groups, older people and young people, who are more likely to be affected by social and economic deprivation, who would thus benefit from enhanced and more widespread local employment and educational opportunities; and
 - co-location, along with other measures likely to promote 'linked trips', would have particular benefits for disabled people, along with children and older people, who are more vulnerable to the adverse health and social impacts of road transport compared to the wider community.
 - introducing a new commitment through proposed Policy WP8 'New Development Affecting Waste Sites' to ensure that, where a new 'sensitive' development is proposed in the vicinity of an existing operational waste site, good design is used to mitigate or minimize the potential impact of existing and potential nuisances on human health and quality of life. In certain circumstances, this will help to avoid or mitigate the adverse impacts of waste operations and associated HGV movements on vulnerable groups such as the elderly, the young, people suffering from health problems and people living within socially deprived areas arising from air pollution, dust, noise, water pollution, surface water run-off, light pollution and impacts on the local road network; and
 - introducing a new commitment through Policy WP10 'Monitoring and Contingencies' to ensure that the effectiveness of the plan in meeting all of its strategic objectives, policies and targets is monitored on an annual basis and that consultation will take place between the partner boroughs to determine whether any of the contingency actions listed in Appendix 1 of the draft SLWP need to be taken. Ongoing monitoring and review is therefore provides a further guarantee that the various beneficial impacts for equalities groups identified in the EqIA matrix can be delivered.

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

Next Steps

4.6 This EqIA Report, which accompanies the SA Report (as Appendix 1) is being published for public consultation alongside the Issues and Preferred Options document over an eight week period from XXX MONTH to YYY MONTH 2020. Copies are available at the following locations:

- <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sl-waste-plan/>;
- www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan/;
- www.merton.gov.uk/local-plan/; and
- www.sutton.gov.uk/currentconsultations.

4.7 Following the Regulation 19 consultation stage, a finalised version of the EqIA Report will be prepared alongside the proposed SLWP 2021-36 and accompanying SA Report for formal submission to the government. In due course, the EqIA Report will be considered by the Planning Inspector at the Examination-in-Public.

Appendix 2

HABITATS REGULATIONS ASSESSMENT (HRA)

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

1. Background to Habitats Regulations Assessment (HRA) Screening

1.1 The requirement for public authorities to undertake Habitats Regulations Assessment (HRA) plans or projects (sometimes termed 'Appropriate Assessment') is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive').

1.2 The aim of the Habitats Directive is to conserve natural habitats and wild species across Europe by establishing a network of sites known as Natura 2000 sites. Under Article 6(3) of the Habitats Directive, an HRA is required where a plan or project is likely to have a significant effect upon a European site, either individually or in combination with other projects.

1.3 Further to this, Article 6(4) states that where an HRA has been carried out and results in a negative assessment (in other words, the development will adversely affect the site(s) despite any proposed avoidance or mitigation measures or if uncertainty remains), consent will only be granted if there are no alternative solutions, there are Imperative Reasons of Overriding Public Interest (IROPI) for the development, and compensatory measures have been secured.

1.4 The protection given by the Habitats Directive have been incorporated into UK legislation through the Habitats Regulations 2010 (as amended). The Regulations are responsible for safeguarding designated European sites within the UK and therefore for protecting the habitats and species listed in the Annexes of the Directive. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on any of the above sites.

1.5 The purpose of undertaking HRA in the preparation of land use plans is to ensure that the protection and integrity of European sites is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that HRA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section²⁴ (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A -85E) which requires local planning authorities to undertake HRA of land use plans in England and Wales in line with the Directive.

1.6 These HRA requirements were carried forward in the Conservation of Habitats and Species Regulations 2017 and therefore have legal force despite the UK's formal departure from the European Union on 31 January 2020.

2. The role of Natural England

2.1 As a public body, Natural England has important statutory duties and responsibilities as defined in the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'), which transpose the European Habitats Directive 1992 and the Wild Birds Directive 2009 into English law. The Habitats Regulations require Natural England to 'secure compliance' with the requirements of the Directives when specifically discharging its nature conservation functions and to have regard to the requirements of the Directives when exercising all of its other functions (Regulation 9). Natural England becomes a 'competent authority' under the Regulations when the exercise of its functions will or may affect European Sites (for example classified SPAs and designated SACs).

²⁴ entitled 'Appropriate Assessments for Land Use Plans in England and Wales'.

2.2 Natural England is a statutory consultee on strategic plans including Development Plans Documents (DPD) such as the SLWP, as well as on related HRA assessments. The Natural England 'Operational Standard Responding to Consultations on Development' (NE, 2017)²⁵ states that

"We will advise Competent Authorities on HRAs where we consider the plan or project is likely to have a significant effect on a European site, either individually or in combination with other plans or projects. We will advise on any Appropriate Assessments (AA), including the measures proposed to avoid, mitigate or compensate for significant adverse effects. We will work closely with decision makers and developers to find solutions to adverse environmental impacts and to maximise common ground. We may, in the last resort, be obliged to object to plans or projects where:

- *an AA does not incorporate sufficient information or necessary mitigation measures*
- *adverse effects on site integrity cannot be ruled out or*
- *where there are imperative reasons of overriding public interest to justify the development and the proposed compensatory measures are not sufficient to ensure the overall coherence of the Natura 2000 network".*

2.3 Accordingly, the Government's National Planning Practice Framework (NPPF) (2019) confirms that competent authorities must consult Natural England for the purposes of the HRA assessments and must have regard to any representations that Natural England may wish to make. This includes the provision of formal HRA screening advice to local planning authorities (including joint authorities).

3. European sites potentially affected by the new SLWP

3.1 The following four European sites are located within or in relatively close proximity to the plan area and are therefore potentially affected by the new SLWP 2021-36:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).

3.2 Map 3.1 shows the location of these sites in relation to the boundaries of the London Borough of Sutton, one of the four partner boroughs. It can be seen that only Wimbledon Common SAC lies within the boundaries of the SLWP area.

3.3 Natural England's formal advice on conservation objectives is publicly available for all European sites. The advice is not repeated here in full, but Table 3.1 below provides links to the respective conservation objectives, supplementary advice on conserving and restoring site features.

²⁵ see [file:///civvmi_vnas07/MyDocs\\$/patrick.whitter/Downloads/NESTND037%20Operational%20Standard%20V1.0%20EXTERNAL%20\(2\).pdf](file:///civvmi_vnas07/MyDocs$/patrick.whitter/Downloads/NESTND037%20Operational%20Standard%20V1.0%20EXTERNAL%20(2).pdf)

Map 3.1: Location of Special Areas of Conservation (SACs) and Special Protection Areas in relation to the South London Waste Plan Area

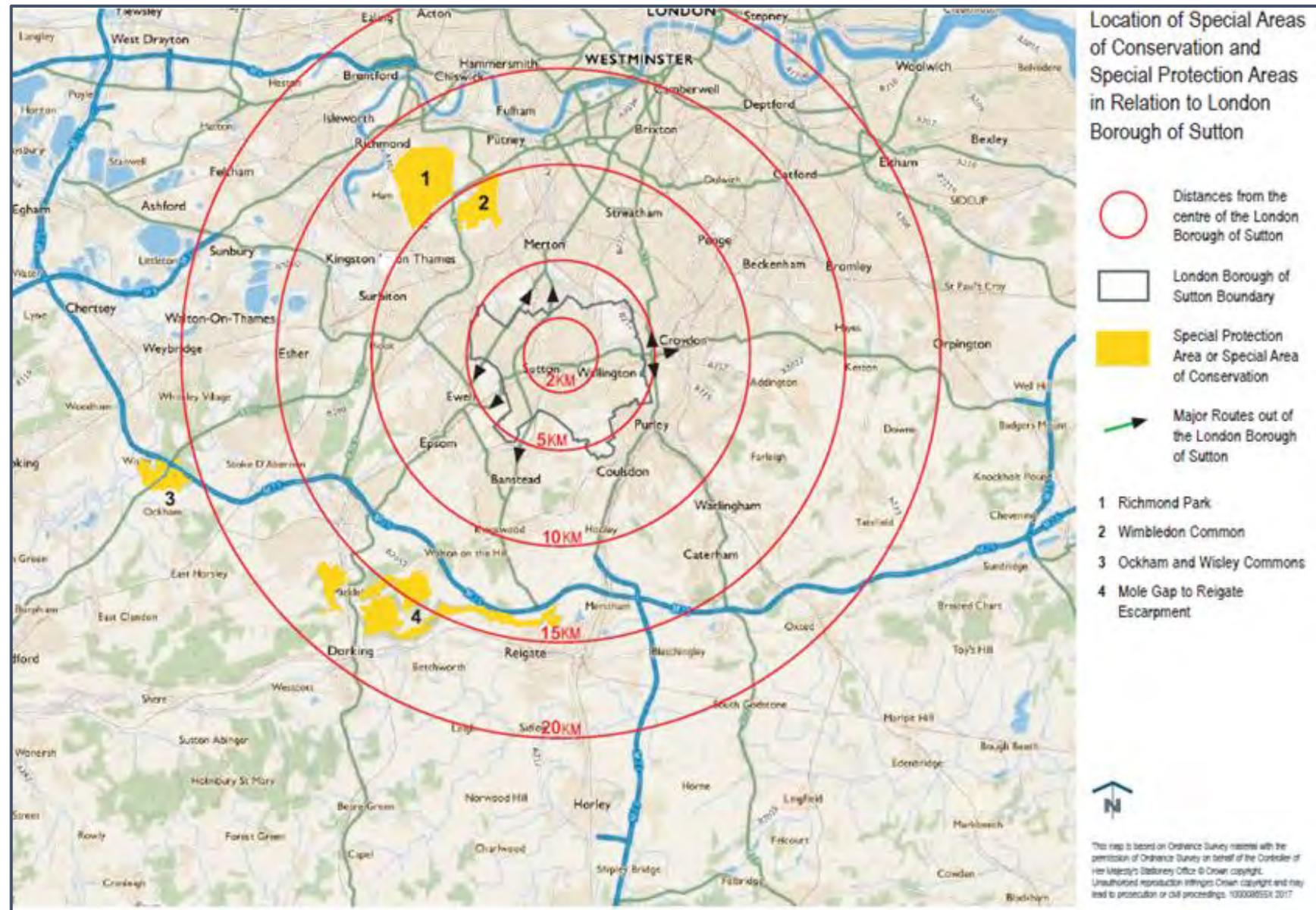


Table 3.1 Links to Conservation Objectives, Supplementary Advice and SAC Citations for European Sites

| European Site | Conservation Objectives | Supplementary Advice | SAC Citation |
|--|---|---|--|
| Richmond Park SAC; | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030246%20RichmondPark%20SACV2018%20(1).pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030082_RichmondParkSAC_COSA_final%20advice%2031%20May%202016.pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Richmond%20Park%20citation.pdf |
| Wimbledon Common SAC; | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030301%20WimbledonCommon%20SACV2018%20(1).pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0030301_WimbledonCommonSAC_supplementary%20advice_final%20advice%2031%20May%202016.pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Wimbledon%20Common%20citation.pdf |
| Mole Gap to Reigate Escarpment SAC | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0012804%20MoleGapToReigateEscarpment%20SACv2018.pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK0012804_MoleGapToReigateEscarpmentSAC_COSA_Final%20Published%2025%20Jan%2019%20(3).pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/Mole%20Gap%20to%20Reigate%20Escarpment%20citation.pdf |
| Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA. | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK9012141-Thames-Basin-Heaths-SPA-V2019.pdf | file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/UK9012141%20-%20Thames%20Basin%20Heaths%20SPA%20-%20COSA%20Final%20-%2009%20May%202016%20v2.pdf | https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001052.pdf file:///civvmi_vnas07/MyDocs\$/patrick.whitter/Downloads/TB_Heaths_spa%202.pdf |

Source: Natural England website May 2020

4. Consultation with Natural England on draft HRA screening assessment

4.1 A draft HRA screening assessment of the emerging SLWP was previously undertaken at the SLWP Issues and Preferred Options stage and included as Appendix 2 to the accompanying SA Report. The draft screening assessment concluded that a full HRA was not required and identified the main reasons underlying this view.

4.2 The HRA screening assessment was published for public consultation between 31 October and 22 December 2019. In addition, an earlier formal HRA screening request on the SLWP was submitted to Natural England via email and letter dated 16 September 2019 (attached).

4.3 In response to the HRA screening request, a letter was received from Sharon Jenkins of Natural England on 17 October 2019 which stated that Natural England "have no comments to make on this plan" (see attached). While this initial response was interpreted by the four boroughs as endorsing the conclusion that no HRA was required, a follow-up email was sent to Natural England on 22 January 2020 to provide more clarity.

4.4 Natural England's subsequent response, received by email from Marc Turner (Senior Planning Advisor) on 31 January 2020, provided further support for screening out a full HRA:

"I can confirm nothing has changed in the 4 Boroughs covered by your plan, to currently change the conclusion of that advice from Natural England. There is nothing I know about on the horizon either that is likely to change that advice. So to confirm, we do not feel anything other than a brief HRA Screening is required".

4.5 The initial HRA screening conclusions have therefore been carried forward in this document unaltered for purposes of consultation on the draft SLWP Submission Version (Regulation 19 consultation)

5. HRA Screening conclusions

5.1 It is considered that a full HRA is not required for the new SLWP for 2021-36 for the following reasons:

- no new waste management sites are currently proposed to be safeguarded in the draft SLWP Submission Version and the wider industrial areas formerly identified in Schedule 2 of the existing SLWP as being suitable for waste management uses are proposed to be removed from waste uses;
- the total volume of waste arisings to be managed in South London over the plan period from 2021-36 and the size of the combined London Plan apportionment for the four boroughs in the new London Plan is significantly reduced by comparison with the situation which existed when the current SLWP was being prepared (between 2008 and 2011). Since the existing SLWP was screened out of the need for a full HRA, it seems reasonable to assume that the new plan may also be screened out on the basis that there will be fewer safeguarded sites, smaller throughputs and therefore an overall reduction in waste-related HGV movements;
- the two sites to the south of the plan area, Mole Gap to Reigate Escarpment SAC and Ockham and Wisley Commons SSSI are over 10 km away from the plan boundaries and, according to expert air quality advice provided to LB Sutton at the Examination-in-Public on the Sutton local

Plan in 2017, emissions from transport movements are extremely unlikely to have a significant effect on the rate of NO₂ disposition plant species over this sort of distance. It is understood that the Richmond Park SAC is not sensitive to elevated levels of air pollution designated for biodiversity features that are not air quality-sensitive (this area is important for stag beetle populations);

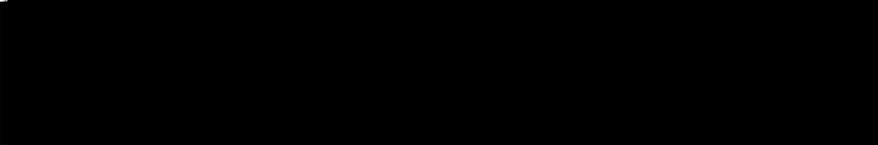
- the draft SLWP Submission Version seeks to promote the highest standards of sustainable design and construction in new or upgraded waste facilities; a shift away from waste transfer to waste management practices higher up the waste hierarchy; cleaner, more efficient waste management technologies in enclosed buildings; and the principles of the circular economy. All of these trends will serve to reduce any adverse effects upon the identified European sites; and
- the proposed strategy for the management of waste arisings in South London is geared towards achieving self-sufficiency and therefore limit imports and export of waste streams to a from the boundaries of the plan area (longer distance HGV movements would be more likely to impact directly upon more distant nature conservation sites).

ANNEX: CONSULTATION WITH NATURAL ENGLAND ON HRA SCREENING

 Patrick Whitter <patrick.whitter@sutton.s...

Habitats Regulations Assessment (HRA) Screening for joint South London Waste Plan

1 message

 25 September 2019

Dear Sir or Madam,

The London boroughs of Croydon, Kingston, Merton and Sutton are now preparing a joint South London Waste Plan (SLWP) covering the time period 2021-38. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21 introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste management facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set in the draft London Plan up to 2038, including the aim of net self-sufficiency by 2026; and
- setting out appropriate planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy

As part of the initial stages of plan-making, we have already prepared an **SA/SEA Scoping Report (attached)** which has recently been sent to the relevant contacts at Natural England, Historic England and the EA for their input (15 September-21 October 2019). Public consultation on the SLWP Issues and Preferred Options document together with a further SA/SEA Report is scheduled to take place from 31 October to 22 December 2019 subject to Committee approval on 8 October.

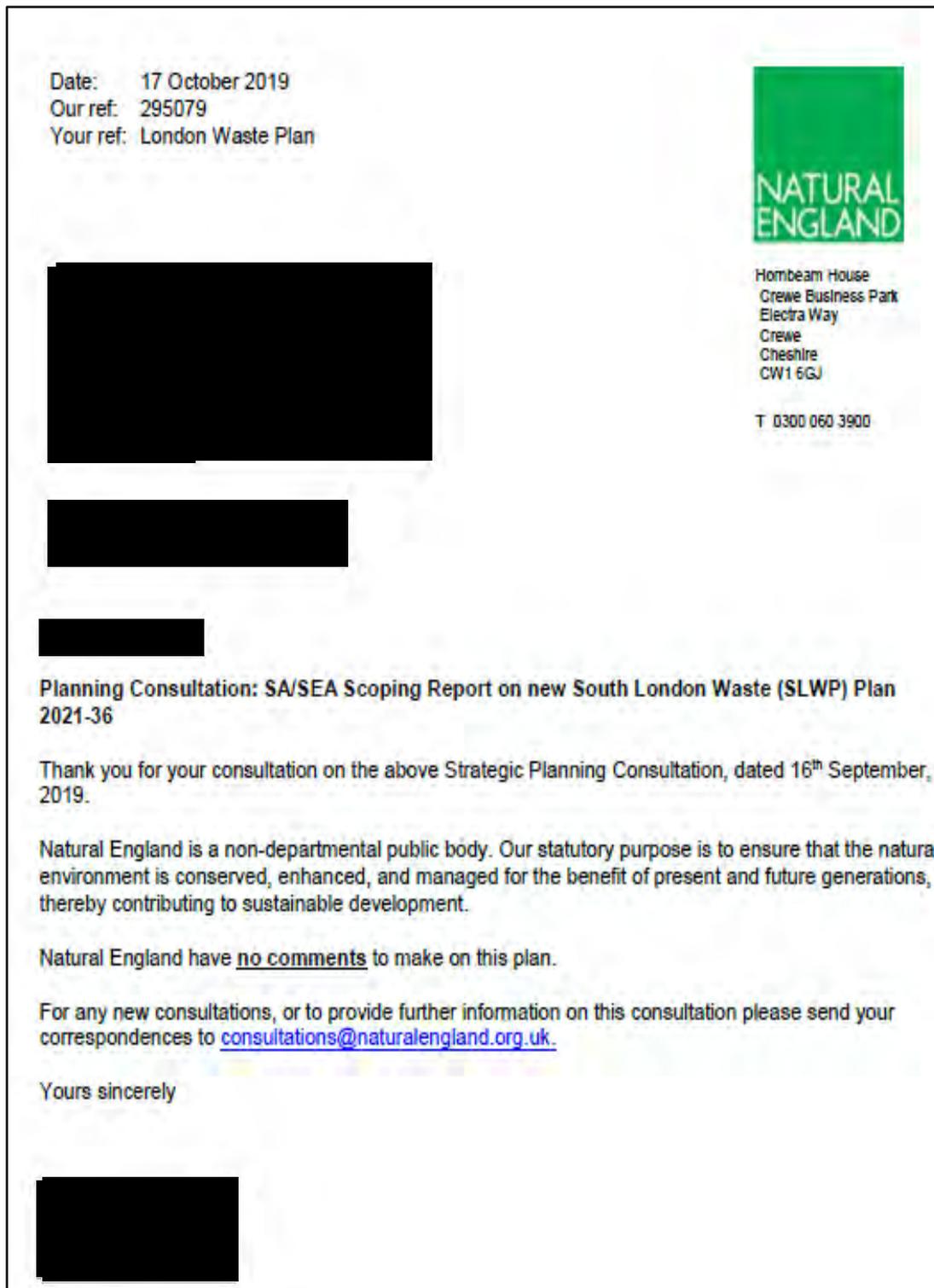
As the officer responsible within the SLWP team for overseeing the SA/SEA, Equalities Impact Assessment (EqIA) and HRA processes, I would be very grateful if you could clarify the following key issues:

(1) At what stage of the plan-making process should an HRA Screening Assessment be prepared?
We were thinking that an HRA Screening Assessment could be published for public consultation alongside the SLWP Issues and Preferred Options document from 31 October to 22 December 2019. This would be accompanied by a request to Natural England for screening advice. If the outcome of screening determines that a full HRA was required in relation to the joint SLWP, there would still be ample opportunity to prepare and consult on this at the Submission draft stage. However it would be useful to have your advice on whether an HRA Screening Assessment needs to be published in advance of consultation on Issues and Preferred Options i.e. in the next 5 weeks.

(2) Does Natural England once again provide formal HRA screening advice to local planning authorities?
When the Sutton Local Plan was being produced between 2014 and 2018, Natural England were not in a position to provide formal HRA screening advice. However colleagues have advised me that this service has now been resumed so I would be very grateful if you could clarify how the procedures for consulting on HRA Screening reports are now meant to operate.

Any advice you could offer on the above HRA issues would be very gratefully received.

Regards

 Patrick Whitter <patrick.whitter@sutton.gov.uk>

Re: Habitats Regulations Assessment (HRA) Screening for the joint South London Waste Plan - Urgent Request for Advice
1 message

 22 January 2020 at 15:28

Dear Sir or Madam,

I'm not sure whether my previous email regarding the South London Waste Plan and HRA screening (dated 25 September 2019) was picked up by anyone at Natural England, but I now need some advice on this issue as a matter of urgency.

As I outlined before, three London boroughs of Croydon, Kingston, Merton and Sutton are now preparing a joint South London Waste Plan (SLWP) covering the time period 2021-38. When it is adopted in 2021-22, the new plan will replace the current SLWP 2011-21 introduced in 2012. The purpose of the new SLWP is to plan for the essential waste management infrastructure to support future population and household growth in South London by:

- safeguarding existing waste management sites;
- identifying sites and broad locations suitable for new waste management facilities if needed;
- providing sufficient sites across the four partner borough to deliver the combined apportionment targets set out in the draft London Plan up to 2038, including the aim of net self-sufficiency by 2026; and
- setting out appropriate planning policies to ensure that new or redeveloped waste facilities within South London drive waste management further up the Government's waste management hierarchy

As part of the initial stages of plan-making, we have already prepared an **SA/SEA Scoping Report (attached)** which was sent to the relevant contacts at Natural England, Historic England and the EA for their input (16 September-21 October 2019). Public consultation on the SLWP Issues and Preferred Options document together with a further SA/SEA Report took place subsequently from 31 October to 22 December 2019.

As the officer responsible within the SLWP team for overseeing the SA/SEA, Equalities Impact Assessment (EqIA) and HRA processes, I would be very grateful if you could clarify the following key issues:

(1) At what stage of the plan-making process should an HRA Screening Assessment be prepared?
A brief HRA Screening Assessment was included as part of the SA/SEA Report on the SLWP Issues and Preferred Options document published for public consultation from 31 October to 22 December 2019, and this concluded that a full HRA was not required. However, if Natural England were to advise the four partner boroughs that an HRA was required after all, there would still be an opportunity to prepare and consult on a full HRA at the Submission draft stage. It is therefore essential that we can have some indication of whether Natural England believes that full HRA is merited in this case.

(2) Does Natural England once again provide formal HRA screening advice to local planning authorities?
When the Sutton Local Plan was being produced between 2014 and 2018, Natural England were not in a position to provide formal HRA screening advice. However colleagues have advised me that this service has now been resumed so I would be very grateful if you could clarify how the procedures for consulting on HRA Screening reports are now meant to operate.

Any advice you could offer on the above HRA issues would be very gratefully received.

Regards


Patrick Whitter <patrick.whitter@sutton.gov.uk>

RE: 295937 Habitats Regulations Assessment (HRA) Screening for the joint South London Waste Plan - Urgent Request for Advice
1 message

31 January 2020 at 14:17

Thank you for your email. Please find the answers to your questions below;

1. Natural England can technically give advice at any and all stages of the plan making process when it comes to HRA. It depends on the situation, the plan, designated sites, legal decisions etc. I see you consulted us on an SA / SEA consultation. We thought we sent you a No Comment, no HRA required, but I infer from your email that you may never have received that. I can confirm nothing has changed in the 4 Boroughs covered by your plan, to currently change the conclusion of that advice from Natural England. There is nothing I know about on the horizon either that is likely to change that advice. So to confirm, we do not feel anything other than a brief HRA Screening is required.
2. Natural England have always tried to provide advice when consulted. Working in the South East of England we have high turnover of staff that can affect our ability to respond on time to all consultations. If you were to consult us, then you should receive a response from us. As above though, to me, it doesn't seem worthwhile consulting us again as nothing has changed and our advice stands.

I hope this helps,

Kind Regards

Appendix 3

CONSULTEE RESPONSES TO SA SCOPING REPORT

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

(1) Environment Agency: 28 October 2019

creating a better place
for people and wildlife



Date 28 October 2019
Ref: SL/2006/100128/SE-03/SP1

Statutory consultation with Environment Agency on Sustainability Appraisal (SA) Scoping Report (incorporating SEA) for the South London Waste Plan

Thank you for consulting the Environment Agency on the review of the South London Waste Plan and Sustainability Assessment Scoping Report. We welcome the review of the South London Waste Plan and see the key issues and opportunities relate to

- Maximising opportunities to plan strategically for ongoing changes in the Waste management sector, tackling waste crime and delivering government objectives to move towards a circular economy in line with the Resources and waste strategy for England (December 2018) and Independent review into serious and organised crime in the waste sector (November 2018) and the emerging new London Plan. We have provided comments in Section 1 on the key strategies and guidance on Waste Management which should be assessed and used to inform the policies and proposed sites within the new South London Waste plan.
- Continued partnership working to ensure waste management infrastructure is "fit for purpose" and resilient to a changing climate and supports the rising numbers of new households across, Croydon, Kingston, Merton and Sutton and a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process.
- Promoting partnership working with other agencies such as Health and Safety Executive (HSE) Public Health England and Planning Enforcement and Environmental Health teams, Metropolitan Police, London Fire Brigade, Driver & Vehicle Standards Agency (DVSA) Her Majesty's Revenue and Customs (HMRC) and Border Force to prevent illegal or poor compliant waste management sites.

- Using the latest evidence on flood risk and climate change to ensure existing and new waste management facilities are located and designed to be resilient to extreme weather events. The latest environmental data sets are available to download from the Defra Data Services Platform
- Developing checklists and guidance as part of the new plan to ensure new and existing waste management sites follow the latest good practice to ensure full enclosure of waste activities in high quality buildings to reduce environmental impacts and are designed to the highest standards to reduce air pollution, noise, surface water pollution and high standards of fire prevention measures
- Sharing information and evidence on the environmental performance and permit compliance across the Plan area.

We hope our comments are helpful and look forward to working with you as the plan progresses to the next stage. If you have any questions or require more information please let me know.

Yours sincerely

**Waste Team Leader
South London**



Section 1 - Feedback on the Scoping Report (September 2019)

We recommend the Scoping Report is updated to include the latest key waste management strategies listed below.

- **HM Government 25 Year Environment Plan (December 2018)**
- **Resources and waste strategy for England (December 2018)**
- **Independent review into serious and organised crime in the waste sector (November 2018)**

These strategies are promoting an integrated approach to resource and waste management, promoting circular economy, reducing pollution and tackling waste crime.

The planning system has an essential role to play in the successful delivery of these strategies and needs to be included within the Scoping Report and requires partnership working.

HM Government 25 Year Environment Plan

Resources and waste strategy for England (December 2018)

Independent review into serious and organised crime in the waste sector (November 2018)

HM Government 25 Year Environment Plan

<https://www.gov.uk/government/publications/25-year-environment-plan>

'A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation. Please refer to Chapter 4 which set strategic goals for increasing resource efficiency and reducing waste pollution and waste.

Chapter 4: Increasing resource efficiency and reducing pollution and waste

1. Maximising resource efficiency and minimising environmental impacts at end of life.
 - i. Achieving zero avoidable plastic waste by the end of 2042
 - ii. Reducing food supply chain emissions and waste
 - iii. Reducing litter and littering
 - iv. Improving management of residual waste
 - v. Cracking down on fly-tippers and waste criminals
 - vi. Reducing the impact of wastewater

The South London Waste Plan review should consider how it can help deliver these strategic objectives locally.

Resources and waste strategy for England (December 2018)

<https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>



- preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy
- minimise the damage caused to our natural environment by reducing and managing waste safely and carefully
- Deal with waste crime

"Our Strategy focuses on known problems with effective solutions that, among other benefits, will reduce our reliance on single-use plastics, cut confusion over household recycling, tackle the problems of packaging and end the economic, environmental and moral scandal that is food waste.

We also tackle the problem of waste crime, which cost the English economy around £600 million in 2016, harms local communities and which pays no heed to the value of scarce resources.

Our goal is to maximise the value of the resources we use, minimise the waste we create, cut emissions and help create a cleaner, greener, healthier planet." Our plan is to become a world leader in using resources efficiently and reducing the amount of waste we create as a society. We want to prolong the lives of the materials and goods that we use, and move society away from the inefficient 'linear' economic model of 'take, make, use, throw'.

We recommend the South London Waste Plan review considers how it can help deliver this national strategy locally and increase the focus on reducing waste crime, use of plastic and reduce food waste across the plan area.

Independent review into serious and organised crime in the waste sector (November 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756526/waste-crime-review-2018-final-report.pdf

'Waste crime' takes many forms, including fly-tipping, illegal dumping or burning of waste, deliberate mis-description of waste, operation of illegal waste management sites, and illegal waste export. It has significant economic impacts: in 2015 illegal waste activity was estimated to have cost over £600 million in England alone. Some estimates put this at an even higher figure of £1 billion. (page 3)

The intentional mis-description of waste is widespread in the construction and demolition industry, with hazardous waste frequently labelled as 'inert' to avoid the highest band of landfill tax. In one case, involving a major, mixed-use development on a brownfield site in South London, the mis-description of over 1000 tonnes of hazardous waste led to it being transferred to sites lacking the controls to ensure its safe disposal. Not only did this present a serious environmental and public health risk; it also represented a tax avoidance of several million pounds. (page 16)

Given the ongoing high levels of regeneration and development across the plan area we recommend the South London Waste Plan review should consider how it can help tackle waste crime and deliver policies / guidance to address this serious environmental issue.



Given the scale of this environmental issue across London could the plan look at the need for Site Waste Management Plans being a policy requirement across the plan area to track and audit waste movements to prevent environmental damage.

Identify steps to ensure vacant sites (e.g. prior to demolition/planning permission) have high standards of security to protect them from illegal waste activities such as empty buildings being broken into and large amounts of wastes deposited and then abandoned. This could be a condition on new planning permissions to ensure the site is secured / protected and ensure the landowner is made aware they are responsible for any clean-up costs if waste is deposited on their site so understand the importance of good security measures to reduce waste crime.

Emerging new London Plan

The emerging new London Plan waste management policies promote a circular economy and managing waste within London's boundaries. This requires high quality and well maintained waste management infrastructure e.g. to manage waste from rising numbers of new residents being introduced into regeneration areas. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>

We recommend a detailed assessment of the existing Local Authority Waste Management sites across Croydon, Kingston, Merton and Sutton and if they have sufficient capacity / are resilient to cope with a population across the boroughs and if not if new or extra waste management facilities are required in addition to the current sites.

For new or modernising waste management sites it's essential they are designed with high quality infrastructure following the latest environmental good practice on minimising dust, noise, pollution, drainage, fire risk, etc. and all waste activities are carried out in fully enclosed modern buildings.

If waste management sites are being lost to residential land uses an assessment should be made on what impact this will have across the borough and the cumulative impact of loss of waste management sites and how that will be managed

Detailed waste management sites feedback

We are reviewing the sites listed in Table 3.4 on Page 15 – 17 and are keen to discuss the latest information and evidence on existing waste management sites.

Some of the listed sites may require major infrastructure upgrade and in their current state may not be suitable unless infrastructure upgrade works are carried out urgently and permit compliance improved. We are keen to discuss process for annual reporting on compliance with Waste Permits and how this can be an indicator in the new South London Waste plan.

We are assessing the sites listed against the following criteria

Current environmental permit compliance rating – all sites with an Environment Agency permit are assessed from A to F with A being most compliant with the permit



conditions and F least compliant (see diagram below for compliance rating process). These compliance ratings are only based on the last detailed site visit and the current performance of the site could have improved / decreased.

Date site last visited by the Environment Agency – we aim to inspect all permitted waste sites at least once a year. Some sites will be visited more depending on compliance issues or environmental incidents. Poor performing sites will be prioritised to either comply with permit conditions or enforcement action taken to revoke the environmental permit.

Drainage issues on site?

Some sites have insufficient or poorly maintained drainage systems causing dust and mud to accumulate on site and mud to leave the site following lorry movements from sites. All waste management sites should be designed and operate to high environmental standards and we are keen to work with you to develop a checklist / guidance to cover this issue as part of the new South London Waste Plan.

Is the site within a “waste cluster”? Across the South London Waste Plan area there are a number of “clusters” of waste management sites which are

- Beddington Lane
- Weir Road
- Willow Lane

We are keen to organise some site visits to these cluster areas and will be in touch to organise some visits to learn more about the ongoing waste management issues and opportunities across the plan area.

We are also assessing, flood zone designation, Source Protection Zone, Air Quality Management Area, if the sites are currently enclosed or not, is there a main river on or adjacent to the site.

(2) Historic England: 21 October 2019



Our ref: PL00622325

Date: 21/10/2019

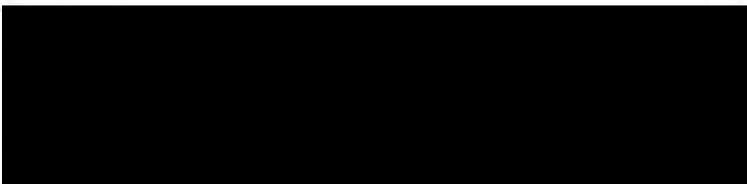


RE: SA/SEA Scoping Report on new South London Waste (SLWP) 2021-36 dated September 2019

Thank you for consulting Historic England on the Sustainability Appraisal (SA) Scoping Report for the new South London Waste Plan (SLWP) 2021-36. We note that the SLWP covers the London boroughs of Croydon, Kingston, Merton and Sutton. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.

Historic England Advice

At this stage we do not consider that the SA Report adequately addresses the historic environment. The report provides a brief framework and much will depend on how it is taken forward. It is important that the SA/SEA process brings some additional understanding and rigour to Waste Development Plan Documents and, with this in mind you should consider expanding the historic environment baseline. While data on numbers of listed buildings and conservation areas are appropriate, it would be helpful to include commentary on other relevant matters that relate to waste developments e.g. the nature of the archaeological resource, the character of the district's historic settlements and their potential vulnerability. It is important also that cultural heritage and townscape are not artificially separated – the strong link between conservation areas and townscape should be clear.





Section 3: Current Waste Arisings and Capacity in South London

Is the proposed appraisal methodology set out in Section 3 sound and consistent with meeting the requirements of both SA and the SEA Directive?

Page 11 states that a Technical Paper has been prepared and that this paper sets out potential sites/areas which could help meet any capacity gap, either through the intensification of existing operations, or through the delivery of new sites. At this stage this site information has not been shared with us for comment. Any new proposals or site allocations need to carefully consider the impact on the surrounding historic environment, demonstrating that the impact can be adequately mitigated.

Section 5: Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)

Have any relevant plans, programmes and sustainability objectives been omitted from Section 4 and the scoping table presented in Appendix 2?

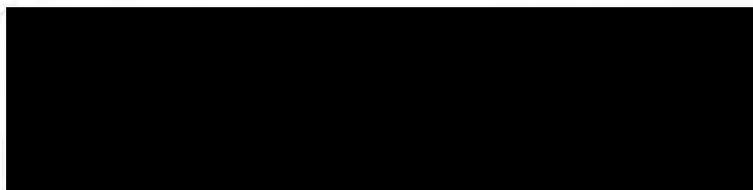
We consider that Tasks A1-A5 set out in Section 4 of the SA Report are appropriate steps to take for this stage of the SA process.

There are a number of other relevant plans and programmes that should be included in section 5, as follows:

- UNESCO World Heritage Convention
- The European Convention on the Protection of Archaeological Heritage
- Convention for the Protection of the Architectural Heritage of Europe
- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979

The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on existing Conservation Area Appraisals and Management Plans from each of the participating London Boroughs.

The Greater London Historic Environment Record (GLHER) should also be listed here given that it provides some of the most up-to-date information on the historic environment. The GLHER should also form part of the Plan's Baseline Evidence in section 6.





Section 6: Baseline (Task A2)

Does the baseline information in Section 6 provide a complete picture of the environmental, economic, and social and equalities factors that need to be considered?

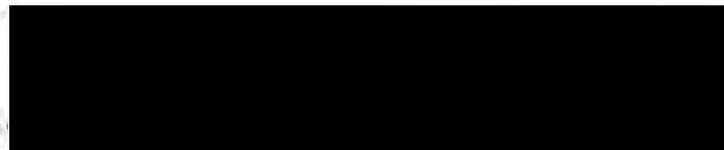
All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas.

The Scoping Report does set out data relating to the numbers of Conservation Areas, Scheduled Monuments and Registered Parks and Gardens located within the Plan area (table 6.59 pg. 76). Only the numbers of Listed Buildings at Risk are listed, we recommend that the overall numbers are also referenced. Helpfully, this table also makes reference to some non-designated heritage assets such as Areas of Special Local Character and Locally Listed Buildings. However, in order to ensure that the potential exhibited by non-statutory preceded archaeological sites is clearly represented at this high level, it would be helpful if this table included number of Archaeological Priority Areas (APAs) there are within each borough and the total area per borough they represent. Reference could therefore be made the draft London Plan and the APA review to the Tier model which will mean that all areas of a borough are assigned to one of four levels of archaeological significance. APAs indicate areas that have archaeological potential, and may contain as of yet undiscovered remains of potentially national interest. Given this the need for preservation in situ of archaeological evidence is not the preserve of Scheduled sites and so early engagement will be key to inform future design options or site selection.

Identification and mapping of APAs and heritage assets at risk can provide an indication of clusters and themes that will help identify sites and key issues surrounding their development.

The National Heritage at Risk Register should form part of the Baseline evidence. Other sources of evidence include:

- National Heritage List for England, www.historicengland.org.uk/the-list/
- Heritage Gateway www.heritagegateway.org.uk
- GLHER Historic Environment Record.
- Heritage Impact Assessments looking into significance and setting.





Historic England

- Visual Impact assessments
- Archaeological assessments
- Topic papers

Section 7: Key Sustainability Issues (Task A3)

Do the key sustainability issues outlined in Section 7 reflect all the significant social, economic and environmental factors relevant to the South London area?

It is regrettable that the historic environment is not recognised as a key sustainability issue in section 7. We note that heritage issues are amalgamated into Issue 14 *Townscape and Visual Amenity*, but this does not sufficiently cover all aspects of the historic environment. The conservation and enhancement of the historic environment is a key objective of sustainable development as set out in the NPPF, and as such we expect to see it recognised in the SA.

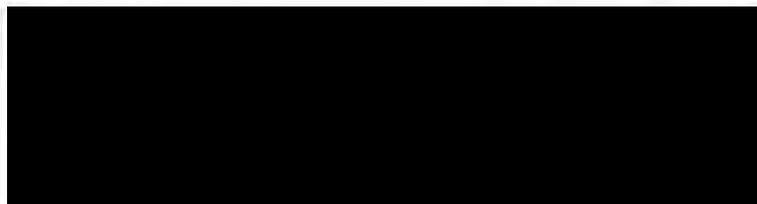
Section 8: Sustainability Appraisal Framework for the South London Waste Plan (task A4)

Does the proposed SA Framework set out in Section 8 identify an appropriate range of sustainability objectives, indicators and targets for the purpose of appraising and monitoring the significant effects of the plan and alternative options?

We raise considerable concern to the lack of a stand-alone objective on the historic environment in the Sustainability Appraisal Framework.

Objective 14: *Townscape and Visual Amenity* does try and incorporate historic environment issues but does not do this successfully. Notwithstanding our advice above, which is that standalone objective on the historic environment is required, the Appraisal Questions to objective 14 are inappropriate. Potential adverse impacts should be avoided in the first instance whereas the appraisal question asks only for harm to be minimised suggesting that harm is built in as acceptable from the outset. No reference is made to the setting of heritage assets in the question or to Heritage at Risk.

The SA is the principle tool for monitoring the effects of the SLWP in operation. Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan's implementation. The indicators set in the table on page 96 are not helpful as they cannot be easily measured. Indicators that monitor the numbers of entries either added or removed to HAR registers as a result of waste developments, or monitoring





the effects of waste sites on the setting of designated heritage assets etc. would be more appropriate. Guidance on indicators and monitoring in respect of the historic environment can be found in advice note listed in the conclusion section of this letter.

Issues such as light pollution, noise, vibration and other disturbance from waste sites can have an adverse effect on residential amenity and biodiversity but this applies equally to the historic environment. Such disturbance can cause direct physical damage to historic buildings and sites both above and below ground, and greatly compromise their settings. It is advised that the SA recognises the impact that these less tangible influences can have upon the historic environment.

We advise that an additional Objective for the historic environment is added. We would suggest that the starting point for formulating Key Sustainability Issues for the Historic Environment should include:

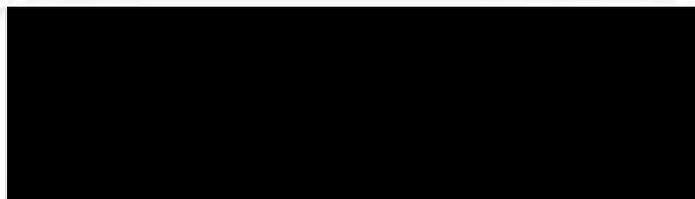
- Conserving and enhancing designated and non-designated heritage assets (including archaeology) and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape /townscape character or quality, or where development has had or is likely to have significant impact (direct and/or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

It would be helpful if the SA included an objective to monitor how land could be restored once waste operations have been concluded on sites.

Appendix 1 - Glossary

Finally, there should be an entry for 'Historic Environment' with an interpretation that references both above and below ground designated and non-designated heritage assets.

The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.





Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled.

Conclusion

Historic England has published guidance on Sustainability Appraisals that you may find helpful. This document contains details on baseline information, sustainability issues and objectives, indicators and monitoring:

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

Other documents you may find helpful are:

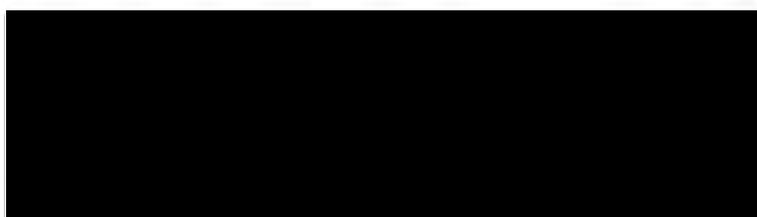
The Setting of Heritage Assets - Good Practice Advice in Planning 3
<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

The Historic Environment and Site Allocations in Local Plans - Advice Note 3
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here:
<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>

In preparation of the forthcoming SLWP, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a waste site, identification of heritage issues for a particular allocation does not automatically correspond



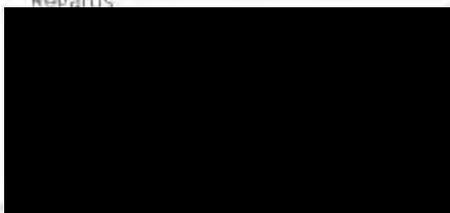


to the support for inclusion of the alternative sites, given we have not yet been asked to assess the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Should you have any queries on the above, please do not hesitate to contact us.

Regards



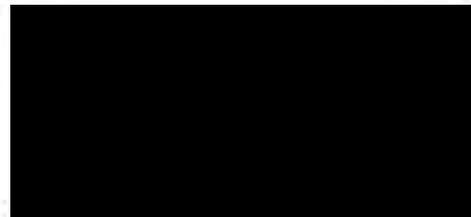
(1) Natural England 17 October 2019

Date: 17 October 2019
Our ref: 295079
Your ref: London Waste Plan



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CW1 8GJ

T 0300 060 3900



Planning Consultation: SA/SEA Scoping Report on new South London Waste (SLWP) Plan 2021-36

Thank you for your consultation on the above Strategic Planning Consultation, dated 16th September, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have no comments to make on this plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely



Appendix 4

GLOSSARY

Draft South London Waste Plan (SLWP)

Submission Version

September 2020

Glossary

Agricultural Waste

Waste from a farm or market garden, consisting of matter such as manure, slurry and crop residues

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

Beneficial Use

The placement of excavation waste in a way that:

- (1) provides environmental benefits, particularly in the restoration of priority habitats, flood alleviation or climate change adaptation/mitigation; or
- (2) contributes towards the restoration of landfill sites or mineral workings

Circular Economy

Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: Design out waste and pollution; Keep products and materials in use; Regenerate natural systems (Ellen MacArthur Foundation)

Commercial Waste

Controlled waste arising from trade premises

Construction and Demolition 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

Energy from Waste

The conversion of waste into a useable form of energy, often heat or electricity

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. 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

HIC

Household, Commercial waste 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

Historic Environment

Both above ground and below ground designated and non-designated historic assets.

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)

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

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 for the depollution, disassembly, shredding, recovery or preparation for disposal of this waste 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

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 Management

Processes by which waste is reused, recycled or recovered. It does not include waste transfer (where waste is sorted and baled) or landfill

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

Processes by which waste is sorted or baled prior to transfer to another place for reuse, recycling, recovery or disposal. Although in practice, usually some reuse, recycling and recovery occurs in the sorting and baling.

Waste Treatment

All processes for waste management (see above) and waste transfer (see above)



SOUTH LONDON WASTE PLAN - ISSUES AND OPTIONS CONSULTATION

LIST OF CONSULTEES

| No | Name |
|-----|--|
| C1 | Wandle Valley Forum |
| C2 | Natural England |
| C3 | National Grid (Wood Consulting acting as agent) |
| C4 | Highways Agency |
| C5 | Thames Water (Savills acting as agent) |
| C6 | The Mayor of London/Greater London Authority |
| C7 | Transport for London |
| C8 | Environment Agency |
| C9 | Maguire Skips (Mark Kelly acting as agent) |
| C10 | Hinton Skips Ltd (Mark Kelly acting as agent) |
| C11 | King Concrete Ltd (Mark Kelly acting as agent) |
| C12 | Group Director of Curley Skip Hire & Waste Recycling Ltd |
| C13 | Poppymill Ltd (High Consulting acting as agent) |
| C14 | Elmbridge Borough Council |
| C15 | Claygate Parish Council |
| C16 | Merton Conservatives |

| | |
|------------|--|
| C17 | North London Waste Plan Boroughs (Barnet, Camden Enfield, Hackney, Haringey, Islington and Waltham Forest) |
| C18 | Surrey County Council |
| C19 | Veolia |
| C20 | SUEZ |
| C21 | Historic England |
| C22 | Viridor |
| C23 | Wimbledon Park Residents' Association |
| C24 | Heathdene Area Residents' Group |
| C25 | Resident PP of Sutton |
| C26 | Resident AH of Sutton |
| C27 | Resident PS of Sutton |
| C28 | Resident MS of Sutton |
| C29 | Resident OW of Sutton |
| C30 | Resident LP of Sutton |
| C31 | Resident JA of Sutton |
| C32 | Resident JS of Sutton |
| C33 | Resident K of Sutton |
| C34 | Resident ASW of Sutton |
| C35 | Resident SB of Sutton |
| C36 | Resident A of Sutton |

| | |
|------------|--|
| C37 | Resident TP of Sutton |
| C38 | Resident JM of Sutton |
| C39 | Resident MT of Sutton |
| C40 | Designing Out Crime Officer, Metropolitan Police |
| C41 | South London Nappies |
| C42 | NHS England |
| C43 | Resident LF of Sutton |
| C44 | Resident JK of Sutton |
| C45 | Resident KA of Sutton |
| C46 | Resident SM of Sutton |
| C47 | Resident A of Sutton |
| C48 | Resident JH of Sutton |
| C49 | Resident ST of Sutton |
| C50 | Sutton Independent Residents/Cllr Tim Foster |
| C51 | Resident S of Sutton |
| C52 | Resident of AM of Sutton |
| C53 | Resident LS of Sutton |
| C54 | Resident AW of Sutton |
| C55 | Resident AS of Sutton |
| C56 | Resident JK of Sutton |

| | |
|------------|---------------------------------|
| C57 | Resident JT of Sutton |
| C58 | Resident RS of Sutton |
| C59 | Resident CC of Sutton |
| C60 | Resident RB of Sutton |
| C61 | Resident LW of Sutton |
| C62 | Resident CS of Sutton |
| C63 | Resident MF of Sutton |
| C64 | Resident RA of Sutton |
| C65 | Resident MR of Sutton |
| C66 | Resident RD of Sutton |
| C67 | Resident Anonymous of Sutton |
| C68 | Resident PML of Sutton |
| C69 | Resident PMC of Sutton |
| C70 | Resident IC of Merton |
| C71 | Northamptonshire County Council |
| C72 | Essex County Council |
| C73 | Resident A of Kingston |
| C74 | Resident B of Kingston |
| C75 | Resident C of Kingston |
| C76 | Resident D of Kingston |

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| C77 | Resident E of Kingston |
| C78 | Days Aggregates (FirstPlan acting as agent) |

LIST OF REPRESENTATIONS

| Rep No | Consultee (with number) | Representation | Officer Response |
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| General Comments | | | |
| 1 | Wandle Valley Forum (C1) | <p>Wandle Valley Forum provides support and an independent voice for 130 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle.</p> <p>We have considered the emerging South London Waste Plan in the context of the Wandle Valley Forum Charter (http //bit.ly/27Yal2m) and in particular its guiding principle for “More consistent planning – Secure common planning policies to leave space along the river bank, support public access, encourage a naturally functioning river, and respect the Wandle’s local character”. This has a particular bearing on the issues identified within the document for some of the specific sites.</p> <p>We ask that additional issues be identified for following sites which relate to their immediate proximity to the Wandle M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA M10 Maguire Skips, 36 Weir Court, Merton SW19 8UG M12 NJB Recycling, 77 Weir Road, Merton SW19 8UG M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG M15 Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA M16 Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA</p> <p><i>[For Wandle Valley Forum comments on these sites, see below]</i></p> | Noted. Individual site issues will be dealt with below. |
| 2 | National Grid | National Grid seeks to encourage high quality and well-planned development in | Noted. Individual site issues will be dealt |

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| | (C3) | <p>the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.</p> <p>National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance.</p> <p>National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area.</p> <p><i>[For National Grid comments on individual sites, see below]</i></p> | with below. |
| 3 | The Mayor of London/GLA (C6) | <p>Thank you for consulting the Mayor of London on the issues and preferred option consultation document for the development of a new South London Waste Plan. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to provide comments on the emerging Waste Plan on his behalf.</p> | (1) Disagree. The shortfall in C&D waste is not significant. It is 172,698 tonnes per annum. Therefore, an additional 11,513 tonnes of capacity per year over 15 years. As Table 16 points out, there is a difference of 528,231 tonnes per annum between the maximum throughput of C&D sites and |

The draft new London Plan

As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. Following the Examination in public, the Panel's report, including recommendations, was issued to the Mayor on 8th October 2019. The Mayor published his intend to Publish version of the London Plan on 17th December 2019. Publication of the final version of the new London Plan is anticipated in Winter 2019/20, at which point it will form part of South London boroughs' Development Plan and contain the most up-to-date policies. Given the anticipated timetable for the adoption of the South London Waste Plan (SLWP) it will need to be in general conformity with the new London Plan.

General

The Mayor welcomes the ambition of the draft SLWP to meet the apportionment targets set out in the draft London Plan and notes that the draft SLWP has identified sufficient existing capacity to manage the anticipated household and commercial and industrial waste arisings allocated to the four boroughs. (1) However, the SLWP indicates that there is a significant shortfall of management capacity for construction and demolition waste. The draft SLWP relies upon intensification and better use of existing waste management sites to meet this identified capacity gap, and to maintain the capacity required for household and commercial and industrial waste. Further, the draft SLWP prohibits any new sites coming forward for waste use except for the provision of compensatory capacity. As such, the Mayor is concerned regarding the long term deliverability of the SLWP. (2) Whilst the intensification of existing waste sites is supported, the draft SLWP does not allow for any contingencies if existing sites are unable to be intensified or the existing capacity for household and commercial and industrial waste is impacted. To be in conformity with the London Plan, the SLWP must remove policies which explicitly prohibit new waste sites coming forward within the plan area. The delivery of new waste sites may enable more waste to be managed further up the waste hierarchy within the SLWP. Prohibiting the delivery of new sites may inhibit innovation and the ability of London to promote a circular economy.

Further information on the methodology for determining the suitability of existing sites for intensification, alongside possible timelines, would provide some reassurance on the deliverability of the SLWP. An assessment of an individual

what the boroughs have allocated to the site so there is a considerable amount of untapped capacity within the existing sites. It is considered that the untapped capacity of 528,231 tonnes is sufficient contingency for C&D waste and there is further untapped capacity within the existing sites managing HC&I. As explained in both the Draft London Plan and the Issues and Preferred Options document, the SLWP boroughs have a severe shortage of industrial land capacity and allocating sites for the sake of contingency will hinder the growth of non-waste industries that the boroughs and The Mayor wish to encourage.

Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not "0tpa" but "179,300tpa". This closes the capacity gap for Construction and Demolition Waste and, indeed, moves the capacity into a small surplus.

(2) Noted. The boroughs will investigate further the suitability of existing sites for intensification.

(3) Disagree. Not many sites have been lost between the 2011 South London Waste Plan and this one. In the 2011 South London Waste Plan, there were 25 safeguarded sites. In the 2019 Issues and Preferred options document, there are 46 safeguarded sites. Furthermore

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| | | <p>site's abilities to manage increased waste capacity should follow a clear, rational and consistent methodology based on local and up to date evidence. (3) Particularly as many sites that were previously identified as suitable for waste management use in the 2011 SLWP, have been identified for release in appendix 2 and the draft new Waste Plan solely relies upon intensification of existing sites.</p> <p>(4) In addition, as currently drafted the SLWP would not be in conformity with the London Plan due to its potential weak implementation of the waste hierarchy on which the Mayor's strategic approach for the management of London's waste is based.</p> <p><i>[For further Mayor/GLA comments on specific topics, see below]</i></p> | <p>safeguarded sites are a far more effective way of ensuring capacity than the less specific "Areas Potentially Suitable for Waste Facilities" which were used in the 2011 South London Waste Plan to resolve the capacity gap.</p> <p>(4) Disagree. It is evident from the wording in WP3 part e, that the councils will be applying the waste hierarchy. As detailed in Rep No 183 below, some changes have been made to remove any perception of a 'potential weak implementation' and to ensure that the draft SLWP is in general conformity with the London Plan on this matter.</p> |
| 4 | <p>Transport for London (C7)</p> | <p>Vision The approach to securing additional use of existing sites to support future capacity, is generally supported. (1) The plan should ensure that future waste operations are more efficient to reduce the transport impacts of freight traffic. It is recommended that the sustainable transport of waste, such as the use of rail or waterways, is included in the vision and objectives of the plan. This is to support policies S18 and T7 of the draft London Plan, the Mayor's Transport Strategy and TfL's Freight and Servicing Action Plan. The plan should make it essential for sites that are proposed for intensification to meet future capacity requirements, or compensatory sites, to improve the efficiency of operations and consider sustainable transportation to minimise impacts. Policy WP4 of the plan requires compensatory sites to consider access for materials and staff by sustainable modes, which is welcomed. This should also be specified for existing sites proposed for intensification in proposed Policy WP5.</p> <p>(2) To mitigate the transport impacts of waste operations, planning obligations may be required as suggested in proposed Policy WP8. This specifically references planning obligations for traffic management or highway improvements. This should include improvements to support active travel, or additional public transport</p> | <p>(1) Agree. The Councils will add the proposed reference to Policy WP5.</p> <p>(2) Agree. The Councils will add the proposed reference to WP8.</p> <p>(3) Agree. LB Sutton is currently undertaking some HGV studies on Beddington Lane and this will inform the Submission version of the new South London Waste Plan.</p> <p>(4) Agree. The Councils will add the proposed reference to the Issues to Consider section.</p> <p>(5) Agree. The Councils will add references to WP8 regarding contributions to support staff travel, cycle and car parking, electric charging facilities, Vision Zero, Delivery and</p> |

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| | <p>services as required to support the Mayor's Healthy Streets approach.</p> <p>Transport Impacts Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. (3) The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. (4) For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'.</p> <p>Healthy Streets (5) All planning applications for waste sites proposed for intensification, or compensatory sites, should include an assessment of the surrounding environment for those travelling on foot or cycle, and access to public transport services. For larger developments, this should follow TfL's Transport Assessment best practice guidance. Many of the sites included in the plan have a low Public Transport Access Level (PTAL) of between 0-2, on a scale of 0 to 6b, where 6b is the greatest access to public transport services. Contributions may be requested towards improvements that support travel for staff on foot, cycle or by public transport where appropriate. Furthermore, cycle parking and car parking, including the provision of electric charging facilities, should be in line with the draft London Plan policies T5 and T6.</p> <p>Vision Zero Sites proposed for intensification, or compensatory sites, should consider the impacts of additional freight traffic on road safety. Potential conflicts with vulnerable road users should be considered, and measures to improve road safety secured as necessary. This is to support the Mayor's Vision Zero approach, and should be included in proposed Policy WP5 of the plan.</p> <p>Delivery and Servicing Plans</p> | Servicing Plans and Tram Infrastructure. |
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| | | <p>Delivery and Servicing Plans (DSP) may be required for waste sites in line with policy T7 of the draft London Plan. This should consider opportunities to reduce freight traffic, particularly at peak times. The DSP could be secured by condition.</p> <p>Tram Infrastructure Proposals for waste sites located in close proximity to the existing London Trams network will require consultation with TfL. This includes sites that directly abut the tram line (M9 and S3). For these sites, the potential impact to tram infrastructure should be specified in the 'Issues to consider'. In addition, Heavy Goods Vehicles (HGVs) can contribute to additional wear and tear of the tram tracks where vehicles are required to route across existing lines.</p> <p>Crossrail 2 Three sites within the plan (M10, M12 and M14) are located within the Weir Road industrial estate, on land that was included in a consultation exercise in 2015 to be used as a future worksite and depot for Crossrail 2. A large site is required at the south end of the tunnelled section, and this location was selected due to the close proximity to Crossrail 2's southern hub at Wimbledon, allowing trains to enter and leave service promptly. Whilst it is noted that the sites are outside of the limits of the Crossrail 2 Safeguarding Direction, any plans to redevelop the sites should be refused, in line with draft London Plan policy T3 (London Plan policy 6.2). Reference to the requirement of these sites for Crossrail 2 should be included in the 'Issues to consider'.</p> <p>Summary The proposed South London Waste Plan as it stands is largely compliant with the strategic transport policies. Measures have been suggested to ensure full compliance with the policies of the London Plan and the Mayor's Transport Strategy.</p> <p><i>[References to specific sites are reproduced against the relevant sites]</i></p> | |
| 5 | Environment Agency (C8) | Thank you for consulting us on the above. Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human | Noted. The Councils have already included some Exempt Sites in their calculations and calculated assumed capacities from the Defra model. There are 12 exempt sites in |

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| | | <p>health. Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. The Waste Plan can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact.</p> <p>Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams. We encourage continued partnership working to ensure waste management infrastructure is fit for purpose and resilient to a changing climate and support a joined up approach to planning and permitting encouraging twin tracking of the permitting and planning process.</p> <p>All of the data studies concentrate on permitted facilities and the London Plan apportionment target, but the SLWP could include an assessment of the contribution that exempt activities make in the Plan area.</p> <p>Tonnage data is not available for these but there is a methodology for estimation of throughput that has been developed for Defra. http://randd.defra.gov.uk/Document.aspx?Document=12262_FinalProjectReport120814.pdf</p> <p><i>[The Environment Agency has made specific comments which are set out below against the relevant sections]</i></p> | <p>the South London Waste Plan area providing an assumed total capacity of 19,080 tonnes per annum.</p> <p>Two of the bigger exempt sites, C8: New Era Metals (500tpa) and M3: Deadman Confidential have been included as safeguarded sites. The Councils consider there may be a case for including Croydon Wood Recycling Ltd (5,000tpa) and Kingston Hospital NHS Trust (5,000tpa) and will investigate further. The other Exempt Sites are very small industrial units or former retail premises and safeguarding may hinder the re-location of these micro-businesses.</p> |
| 6 | <p>Group Director of Curley Skip Hire & Waste Recycling Ltd (C12)</p> | <p>I agree with the approach of carrying forward only existing sites from the 2011 South London Waste Plan. Waste Planning should also provide for a reduction in the production of waste.</p> <p><i>[Other specific comments are set out below against relevant sections]</i></p> | <p>Noted.</p> |
| 7 | <p>Merton Conservatives (C16)</p> | <p>Merton Conservatives accept that the South London Waste Plan is based on the draft London Plan and as such follows many of its policies regarding waste management strategy and recycling. However we believe that there is room for significant improvement in these areas, and support a more ambitious target for recycling, especially for an item which can be recycled and are currently sent to landfill.</p> | <p>(1) Noted. The C&D waste planning is always challenging. Arisings are based on the GLA's employment forecasts by borough for the construction industry until 2036. There is also considerable uncertainty about how much of the arisings</p> |

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| | <p>Recycling</p> <p>(1) The present recycling target of 95% of construction and demolition waste to be recycled by 2020, seems hard to achieve and the SLWP does not set out how this will be measured and enforced. (2) The target of 65% municipal waste to be recycled by 2030 does not seem to be ambitious enough, we support the greatest possible amount of recycling in Merton, and believe that the council can achieve a greater level of recycling of municipal waste in a shorter period of time.</p> <p>(3) The target for no bio-degradable or recyclable waste to be landfilled by 2026 is not ambitious enough. We would like to see this achieved within a shorter time scale, and encourage the council to set out a pathway to achieve this.</p> <p>We feel that the targets for recycling cannot be met through incineration, and that the SLWP must instead aim for pure recycling rather than meeting targets through incineration.</p> <p>Waste management</p> <p>We support the target of being net self-sufficient in terms of waste generation and waste management for all types of waste and feel that this can be achieved before 2036. Currently Merton Council is aiming to decarbonise all buildings and services by 2030, so we feel that self-sufficiency could be achieved in the early 2030s.</p> <p>We support the creation of an additional household recycling centre (council tip) in the north of the borough to serve local residents.</p> <p>(4) Local waste collection</p> <p>Since the Labour administration appointed Veolia waste collection in Merton has been a shambles which has led to large piles of waste filling the streets. Despite repeated calls for action and improvement by the Conservative Group performance still remains poor. If the borough and the wider SLWP is to meet its recycling and other targets then the performance of Veolia must rapidly improve.</p> <p>Cross boundary waste disposal</p> <p>We support the highest possible levels of recycling in Merton and oppose the transfer of waste into the borough which could be recycled in its borough of origin.</p> | <p>are recycled on the construction site and the whole sector is subject to huge peaks and troughs. All this together means planning is far from cast iron. In fact, the South London Waste Plan target may be an over-estimate of the arisings. Therefore, the Councils consider 95% C&D waste target is achievable.</p> <p>(2) The 65% municipal target is challenging. In the 2018/19, the municipal recycling rates were: RB Kingston 49.4%, LB Sutton 49.1%, LB Croydon 47.3% and LB Merton 38.5%.</p> <p>(3) The landfill target has been achieved as the Beddington landfill site ceased to accept waste.</p> <p>(4) It is important to note that the South London Waste Plan will set out planning policies and safeguard sites for waste facilities across the four boroughs from 2021 to 2036. It will be used for the determination of planning applications relating to waste facilities.</p> <p>The South London Waste Plan is therefore being prepared by Merton, Kingston Sutton and Corydon, in their roles as Waste Planning Authorities, separate from the South London Waste Partnership, which is a distinct legal entity, responsible for waste collection and management.</p> <p>As a planning document, the policies and</p> |
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| | | <p>We think it is only acceptable for hazardous waste to be exported to other boroughs. Clearly this is an aspiration that will take time to achieve, but it will be necessary for other boroughs to manage their own waste, excluding hazardous waste, and not continue in sending part of this to Merton and the other SLWP boroughs.</p> <p>Apportionment We recognise that whilst Merton remains a member of the South London Waste Partnership the borough will remain part of the apportionment system, however as the SLWP boroughs will be taking in an additional 13% more waste from other boroughs it is clear that the rest of London needs to increase the amount that is recycled and processed in other boroughs.</p> | <p>safeguarded sites relate to the delivery of planning related targets, as set out by the Mayor of London, and does not directly relate to the performance and targets of the South London Waste Partnership or their contractors, unless it has a bearing on a planning application.</p> |
| 8 | North London Waste Plan Boroughs (C17) | <p>The North London Boroughs support the general approach of the South London Waste Plan Issues and Preferred Options. We accept that you are planning for seven waste streams as set out in PPG. We note that you are making provision for more than your projected waste arisings for Household and Commercial and Industrial waste as a result of the apportionment to your Boroughs in the draft new London Plan.</p> <p>The Issues and Preferred Options does not currently contain monitoring indicators and this will need to be addressed in the next version.</p> | <p>Agree. The Councils will add a monitoring policy and table.</p> |
| 9 | Surrey County Council (C18) | <p>Overall, we feel the South London Waste Plan Issues and Preferred Options document complements the vision, objectives and policies in the Surrey Waste Local Plan in planning to be net self-sufficient by 2036 and we are generally supportive of the document. However, we do have some concerns about how this is to be achieved. <i>[see below]</i></p> | <p>Support welcomed.</p> |
| 10 | SUEZ (C20) | <p>SUEZ agrees with the approach of carrying forward existing sites from the 2011 South London Waste Plan. However, in accordance with our comments relating to Policy WP1, the draft SLWP would benefit from some flexibility to accommodate new developments should a need be identified as the industry transitions to a more circular economy.</p> <p>As the pressure for development land continues to intensify, SUEZ would welcome the inclusion of a policy embedding the Agent of Change principle into the SLWP</p> | <p>Disagree. The Councils consider there is sufficient flexibility in the plan with sites of various sizes safeguarded in the plan and many of them not operating at the maximum throughput.</p> <p>Agree. The Councils will add a new Agent of Change policy so that a new, nearby use</p> |

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| | <p>to protect the efficiency and potential of existing operational sites. This will also be necessary to safeguard the strategy of the plan to intensify existing facilities.</p> <p>Paragraph 8 of National Planning Policy for Waste (NPPW) states: “When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:</p> <ul style="list-style-type: none"> • the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;” <p>Likewise, paragraph 182 of the National Planning Policy Framework requires: “...Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”</p> <p>The above policies have been embedded within the new London Plan at Policy D13 (Intend to Publish Version – December 2019), which states:</p> <p>“A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.</p> <p>B Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.</p> <p>C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.</p> | <p>should not constrain an established use.</p> |
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| | | <p>D Development proposals should manage noise and other potential nuisances by:</p> <p>1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area</p> <p>2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations</p> <p>3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.</p> <p>The inclusion of a similarly worded policy would ensure that the SLWP is consistent with national and regional documents.</p> | |
| 11 | Historic England (C21) | <p>The plan could better represent heritage and, at present, does not set out an appropriate policy framework for the consideration of those waste development applications which would impact upon the historic environment. However, with minor amendments to wording these issues could be overcome.</p> <p>As a minimum, the plan should:</p> <ul style="list-style-type: none"> - Correctly characterise the historic environment of the plan area and identify key heritage assets - The policies should set out a requirement for any waste development applications to adequately assess the potential impacts upon the historic environment - The policies should seek to ensure that waste developments conserve those elements which contribute to the significance of heritage assets <p>We expect the provision of a standalone policy which addresses the historic environment. As a minimum alternative we expect to see a standalone policy criterion on the need to conserve or enhance the historic environment. Policy WP5 Protect and Enhancing Amenity, is one place where a stronger, standalone criterion on the historic environment could be added. We note policy WP5 does make reference to the historic environment but we do not consider this criterion to be adequate. Adverse impacts upon heritage should be avoided in the first instance, having regard for is a weaker test.</p> | <p>Disagree. Heritage assets are covered in Policy WP5 generally and in the "Issues to Consider" section for the sites tailored to the site's relationship with a historic asset.</p> <p>Furthermore, all waste applications will be considered against a borough's Local Plan, which have stand-alone heritage policies. These stand-alone Local Plan heritage policies include the phrasing suggested.</p> |

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| | <p>The heritage policies, criterion and supporting text should make useful and appropriate reference to setting throughout. It is however important to note that setting it is not designated but that it is an important aspect of significance. It is important to note that the setting of a heritage asset is not only a visual consideration but also includes others environmental factors through which we experience a heritage asset. In relation to waste developments policy criteria should be set out to ensure that operations do not have unacceptable adverse impacts upon the historic environment including from: noise, dust, vibration, visual intrusion, traffic, tip slope stability, differential settlement, potential excavation, subsidence, increased flood risk, and ground and surface water migration. We advise that the plan contains additional wording in the supporting text to clarify the different aspects of setting that need to be considered.</p> <p>Some example wording for a standalone policy or criterion within a wider policy could be: Waste development proposals will be permitted where it can be demonstrated that they will conserve, and where practicable, enhance those elements which contribute to the significance of the area's heritage assets including their setting.</p> <p>In the site specific context where the significance of a heritage asset has already been compromised in the past by unsympathetic development either to the asset itself or within its setting, consideration still needs to be given to whether additional change will further detract that significance in order to accord with NPPF policies. This will be particularly important given the increased growth pressures across London. It is expected that the cumulative effects regarding the historic environment will be addressed in any Heritage Statement submitted in support of planning applications. We advise that this is specified in the plan.</p> <p>Sites The majority of sites are located in areas which have few above ground Heritage assets. We have the following comments to make on some sites where heritage sensitivities have been identified [<i>see C1: Able Waste Services and C8 New Era Metals and M15 Riverside AD Facility and M16 Riverside Bio Facility below</i>]</p> <p>Conclusion</p> | |
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| | | <p>In preparation of the forthcoming SLWP, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.</p> <p>Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a waste site, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not yet been asked to assess the sites.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> | |
| 12 | Historic England (C21) | <p>Archaeology:</p> <ul style="list-style-type: none"> - p.34, item 13 states 'Archaeological evaluation' this could be improved to state 'Archaeological assessment and possible evaluation'. - p.39, 5.48 states 'Archaeological investigation, recording and keeping of artefacts and safeguarding of remains' this could be improved to state 'Archaeological investigation and possible mitigation, to safeguard the significance of the remains.' - P48+ we are pleased to see that the site by site schedule includes the Identification of APAs under 'Planning Designations' and 'Issues to Consider'. We are especially pleased to see that the site specific policies specifically require the evaluation and preservation of archaeological remains within APAs. - General point: Given the above, irrespective of whether a site is located in an APA or not, Historic England would need to be consulted in respect of non-designated archaeology in the following situations cut down from the list contained within the Planning Charter cited above (Charter for the Greater London Archaeological Service) | <p>Disagree. All waste treatment applications will be considered against not only the South London Waste Plan but also the relevant borough's Local Plan, which include specific archaeology policies or archaeology sections within an overall heritage policy.</p> <p>Noted.</p> |

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| | | <p>The Greater London Archaeological Advisory Service (GLAAS) should be consulted on:</p> <ul style="list-style-type: none"> - All major planning applications over 0.5 hectares whether in or not an APA - All Environmental Impact Assessment Scoping requests and Environmental Statements - Any application supported by an archaeological desk-based assessment - Minor planning applications in any APA (Tiers 1 to 3) - Submission of details in relation to archaeological conditions - Appeals on applications for which an archaeological issue has previously been identified <p>To consult GLAAS please email: glaas@historicengland.org.uk</p> <p>Finally, the APA review has been completed for Croydon and Merton boroughs.</p> | |
| 13 | <p>Heathdene Area Residents' Group</p> | <p>In particular we support the general principle of driving waste up the waste hierarchy and dealing with waste locally. We agree the draft Vision and draft Objectives.</p> <p>We agree with all WP policies (WP1 to WP8) and all Sutton-related safeguarding policies (S1 to S12).</p> <p>(1) However, in respect of WP2, while the London Plan seems to indicate a reasonably significant municipal waste increase (due to increase in housing), the projected waste water increase from 2020 to 2035 seem rather small in comparison.</p> <p>Further observations:</p> <p>(2) We are not clear exactly what will happen to the Sutton waste that currently goes to Beddington farmlands after it closes in 2023. Is there an actual plan?</p> <p>(3) The desire to develop forms of industrial recovery of waste (e.g. to recycle or reuse types of waste rather than sending it to landfill) is reliant on attracting and developing industrial businesses which will use the waste to create other products or reuse it in some way, and to create a waste neutral effect. There are no policies</p> | <p>(1) Noted. The C&D waste planning is always challenging. Arisings are based on the GLA's employment forecasts by borough for the construction industry until 2036. There is also considerable uncertainty about how much of the arisings are recycled on the construction site and the whole sector is subject to huge peaks and troughs. All this together means planning is far from cast iron. In fact, the South London Waste Plan target may be an over-estimate of the arisings. Therefore, the Councils consider 95% C&D waste target is achievable.</p> <p>(2) Much of the waste which was going to the Beddington Farmlands landfill will go to the Energy Recovery Facility at Beddington.</p> |

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| | | that encourage such development. | (3) Agree. The re-use and re-making of products (often called the circular economy) needs central Government financial incentives to make it more attractive. This is beyond the scope of local authorities. |
| 14 | Resident MS of Sutton (C28) | Please don't mask increased recycling rates by burning more rubbish | Noted. |
| 15 | Resident OS of Sutton (C29) | How you will ultimately shut down the ERF within 15 years or less | The ERF contract is until 2037. |
| 16 | Resident LP of Sutton (C30) | Shut down the incinerator | Noted. |
| 17 | Resident JS of Sutton (C32) | Main roads are not cleaned that big trucks are using to transport waste! | Noted. |
| 18 | Resident SB of Sutton (C35) | Close the Beddington incinerator and open the nature reserve before any more damage is done to local wildlife and residents' health. | The ERF contract is to 2037. The Beddington Restoration Roadmap expects Beddington Farmlands to be a nature reserve by 2023. |
| 19 | South London Nappies (C41) | Reusable nappies need to be promoted to reduce landfill and hazardous waste. E.g. voucher scheme through Real Nappies for London | Noted. |
| 20 | Resident JH of Sutton (C48) | An honest cost breakdown put to residents broken down for all boroughs to see how much of public money the council are proposing to waste yet again. Sutton's failure experiment with Veolia hasn't gone to well but somebody is profiting from the incompetence. | The cost to residents is zero as this is a planning document, produced as a result of winning Government funding, and any intensification of sites will be done by the private sector, provided they meet the policies in this plan. |
| 21 | Resident ST of Sutton (C49) | Getting rid of the incinerator | Noted. |
| 22 | Sutton Independent | A proper strategic, long term approach with relevance to climate change and positive changes in the make-up of waste. Allowing SUEZ, with a history of fires at | Noted. The SUEZ site on Beddington Lane now has planning permission and the |

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| | Residents/Cllr Tim Foster (C50) | <p>its existing site in Merton, to bring in 350 HGV loads a day to convert to a fuel that will be burnt is not the action of Council(s) committed to climate change.</p> <p>Doubling the HGV waste traffic in Beddington Lane is another blot on the environmental copybook - the road infrastructure CANNOT take it. Look at the maps of the 1930's - rail line spurs acted as the core transport link for the industrialisation of the area.</p> <p>The SLWP is environmentally and economically illiterate and should be re-thought</p> | <p>transport implications were discussed at the Sutton Planning Committee.</p> <p>Noted. With the conversion of the Croydon-Wimbledon line to a tram, the options for rail development are limited.</p> <p>Noted.</p> |
| 23 | Resident AS of Sutton (C55) | <p>Insufficient waste collection from homes, - of late collections have been reduced. Recycling at my block of flats is virtually impossible due to the lack of suitable bins</p> | Noted. The matter will be passed on to the council's waste collection service |
| 24 | Resident JK of Sutton (C56) | Get rid of the incinerator in Beddington Lane | Noted. |
| 25 | Resident LW of Sutton (C61) | It doesn't actually look at how it is going to reduce waste in the area | Noted. However, the GLA apportionment figures assume a 5% reduction in waste arisings by 2036. |
| 26 | Resident MF of Sutton (C63) | "More recycling facilities in Sutton Increased air monitoring in the Hackbridge area" | <p>Disagree. The plan does not promote more waste facilities, merely some modest intensification of existing sites.</p> <p>Non-automatic air quality monitoring takes place at 57 London Road, Hackbridge and Hackbridge Primary School. See: https://drive.google.com/file/d/1bd_NFJAYCv3UPEjSiJ124gHPiD5pdgSP/view</p> |
| 27 | Resident RD of Sutton (C66) | Constant air monitoring around Beddington Lane incinerator, with regular, transparent publishing of results and incinerator being closed down when it exceeds safe air quality levels | Automatic air quality monitoring takes place at two locations on Beddington Lane. See: https://drive.google.com/file/d/1bd_NFJAYCv3UPEjSiJ124gHPiD5pdgSP/view |
| 28 | Resident Anonymous of | Ban of waste lorries driving through Beddington - this was previously promised but has not yet happened. Beddington is not only an industrial area but also | LB Sutton carried out the Statutory Consultation in March 2019 about the |

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| | Sutton (C67) | residential (and schools) with many of the residents having lived here prior to some waste facilities being built. Without previous commitments re traffic and resulting emissions in the area being carried out there should be no further expansions resulting in increase of traffic | proposed Traffic Management Order PR 1063 – the Beddington Village Heavy Goods Vehicle (HGVs) restriction extension. Given the level of interest and the sensitive nature of the proposals, LB Sutton has now taken the decision to defer the rollout of these proposed restrictions for a few months. This will allow LB Sutton to address questions and concerns raised, do further engagement with affected businesses, and undertake additional monitoring to ensure the evidence base for the scheme is robust, as well as allow the completion of various other roadworks in the area which are impacting the network. |
| 29 | Resident IC of Merton (C70) | [Expletive] | Noted. |
| 30 | Essex County Council (C72) | Support is given to the recognition that planning over a larger area such as that covered by the South London Waste Plan boroughs allows for an increased potential to accord with the proximity principle and net self-sufficiency in waste management, enabling a more strategic and sustainable approach to waste management in this area | Noted. |
| Key Issue 1 Cross Boundary Issues | | | |
| 31 | The Mayor of London/GLA (C6) | <p>The Mayor supports the retention of existing waste management sites. As outlined in both the current and draft new London Plans, the Mayor has set a target for London to be net self-sufficient in waste management by 2026. The SLWP must demonstrate sufficient waste management capacity to manage expected waste arisings.</p> <p>Net self-sufficiency allows for the movement of small amounts of waste across borders due to operational and environmental considerations. Achieving net self-sufficiency is reliant upon individual or groups of waste planning authorities</p> | Agree. The Councils will re-phrase paragraph 3.25. |

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| | | planning for sufficient sites to meet identified need and the management of the equivalent waste arisings within their area. Paragraph 3.25 of the draft SLWP should be amended to reflect these aims, specifically the suggestion that the SLWP should be flexible enough to allow for the export of waste must also include reference to the need for the importation of waste to achieve net self-sufficiency in the SLWP area and across London. | |
| Key Issue 2 How Much Waste Must The South London | | | |
| 32 | Viridor (C22) | We agree with the approach to plan for the higher draft London Plan apportionment of waste for the purpose of preparing a new South London Waste Plan to 2036. Clearly, the emerging SLWP would need to reflect the London Plan as it becomes adopted. We agree with the London Plan approach to include constrained (those with land use / environmental factors) sites as some of these sites may be more deliverable than unconstrained sites. | Noted. |
| Key Issue 3 Scarcity of Land | | | |
| 33 | The Mayor of London/GLA (C6) | (1) Paragraph 3.21 claims that the South London area has a shortage of available land for business and industry and if this is the case it should be supported by local and up to date evidence. The London Borough of Sutton is identified as a 'provide capacity' borough in Table 6.2 of the draft new London Plan and according to the London Industrial Land Study 2017, needs to provide approximately 14.5ha of industrial land up to 2041. The remaining south London boroughs are 'retain capacity' boroughs. The Waste Plan should not prohibit proposals for waste sites coming forward in industrial areas, particularly where they could also contribute to London's net self-sufficiency. (2) Of particular concern to the Mayor are proposed policies WP1(d), WP2(b), and WP2(d) that are considered to be overly restrictive. This could prevent newer, more efficient, more sustainably located and better aligned businesses with circular economy principles from being developed. In addition, it is difficult to understand how proposed Policies WP2 (b) & (d) are justified given there is a shortfall in capacity to manage construction & demolition and hazardous waste within the SLWP area over the plan period. These policies may hinder London's ambition to be net self-sufficient in the management of waste and promote a more circular economy. | (1) Disagree. The Councils do not currently see a need to undertake a local industrial land study as all recent evidence is pointing to the same conclusion. The Croydon Technical Report on Employment (2017) noted a tight industrial land market with the only release possible being some scattered employment sites adjoining residential areas. The Merton Employment and Economic Land Study (2010) came to the same conclusion. The Kingston Economic Analysis Study (2014) noted a very tight industrial land market with no scope for release. The Sutton Town Centre and Economic Development Assessment (2015) noted an extremely tight labour market. Consequently, the London Industrial Land Demand Study (2017) |

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| | | | <p>which advised Sutton as a “provide” borough and Croydon, Kingston and Merton as “retain” boroughs came as no surprise. Given this current convergence of all evidence, the Councils see no requirement to commission another study which is extremely likely to draw the same conclusion.</p> <p>(2) Disagree, given the industrial demand, the Councils consider the approach of speculatively designating waste sites would not be appropriate and it could have the effect of sterilising these sites for other industrial uses. As all the existing sites have planning permissions, it can be deduced that they are suitable for waste management or have been conditioned to be so. As shown in Table 16, there is a huge amount of untapped capacity on the existing sites with 528,231 tonnes for C&D waste and further untapped capacity within the existing sites managing HC&I</p> <p>Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not “0tpa” but “179,300tpa”. This closes the capacity gap for Construction and Demolition Waste and, indeed, moves the capacity into a small surplus.</p> |
| 34 | Environment Agency (C8) | <p>Don't agree with this statement in the context of the circular economy that waste sites are more efficient per unit area.</p> <p>On the contrary, the move towards the CE will involve more sites that capture</p> | <p>As the South London Waste Plan can meet its targets by safeguarding existing sites only, the Councils consider there is no need to use estimates for tonnes managed per hectare. The Councils are very grateful to</p> |

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| | | <p>materials from the waste, and also sites that dismantle and remanufacture goods, which tend to be less efficient in terms of throughput per unit area. This is due to the need for storage of materials prior to, and post-treatment, and also due to the more labour intensive and/or mechanically intensive nature of this type of undertaking.</p> <p>A recent study by Hertfordshire County Council for the evidence base for their minerals and waste plan that we have been given to peer review estimates in a more circular economy waste may be treated at a rate of around 24k tonnes per Hectare, compared to the general assumption of 80ktonnes per Hectare that has been used in many London waste local plans.</p> <p>A recent study by that we undertook shows throughput per hectare to be at a maximum theoretically of around 45k tonnes and minimum of around 24k tonnes per Hectare overall in a more circular economy, depending on the amount of secondary treatment that is assumed .</p> <p>The argument they can contain waste growth by increasing throughput at existing facilities is not convincing, as there is no guarantee that any of this will actually happen, as this would need significant investment, which the SLWP are not in a position to provide.</p> | <p>Hertfordshire County Council for allowing them to view their draft document.</p> <p>As regards the circular economy, the lower tonnes per hectares throughputs for circular economy activities assumes that the dismantling and re-making will occur on the same site. The Councils consider that it is highly likely that the dismantling would take place at a waste site but the dismantled elements would then become raw materials for re-manufacture at a different location (in effect a factory). The re-manufacture would not then be a waste use but a typical B2 use. The dismantling sites would be equivalent to the household, commercial and industrial waste transfer stations which operate, according to the Hertfordshire study, at 50,000 tonnes per hectare. This is above many of the South London Waste Plan's safeguarded sites.</p> |
| 35 | Viridor (C22) | <p>In the context of the emerging London Plan, namely increased demand for land for new homes and associated infrastructure, protection of green and open space, South London also needs to meet demand for industrial land. We support not unnecessarily designating industrial sites for waste and sterilising these sites for other uses.</p> <p>Paragraph 3.22 recognises that the waste management solutions have been delivered in accordance with the sites and areas set out in the 2012 adopted SLWP. One of the key facilities delivered in accordance with the existing waste plan is the Beddington ERF. This paragraph further states that 'modern facilities are more efficient in their layout, processing capability and landtake.' Although this can be true, modern facilities also require management and maintenance due to their mechanical processes which add a layer of complexity when compared to waste management by landfill. This important requirement seems to be</p> | <p>Noted. However, the Councils have reviewed the Beddington Farmlands Restoration Plan and noticed the current proposed safeguarded site includes some of the Wandle Valley Regional Park. Therefore, the Councils will be redrawing the safeguarded site boundary for the Submission draft to align with the extent of the Wandle Valley Regional Park.</p> |

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| | | <p>overlooked as the plan is focused only on facilities addressing the apportionment target and does not consider the temporary unavailability of such facilities.</p> <p>During the management and maintenance of a modern facility, the needs are often twofold. Firstly, hardstanding areas are needed for maintenance/set down (i.e. storage of replacement pieces, scaffolding, works area), welfare provision and parking for personnel involved. Secondly, alternative areas are needed to accept waste intended for the facility whilst it is out of operation, so that it can be bulked up and transferred to an alternative treatment facility. Emerging Policy documents need to recognise and facilitate the needs of modern waste facilities, which overall are more efficient in their layout, processing capability and landtake.</p> | |
| 36 | Essex County Council (C72) | <p>Paragraph 3.21 states that “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.” It is considered that appropriately supportive employment land policies allow for suitable employment generating sui generis uses to come forward on land allocated for B2 and B8 uses without any specific designation. In any event, waste facilities are an integral part of sustainable development and the circular economy, and the need for such should be one that is responded to positively through the planning process. The NPPW states that ‘positive planning plays a pivotal role in delivering this country’s waste ambitions through...recognising the positive contribution that waste management can make to the development of sustainable communities.</p> <p>More generally speaking, it is held that a number of the policies in this document are too inflexible, and therefore contrary to NPPF Paragraph 11 (‘plans should...be sufficiently flexible to adapt to rapid change’). The final iteration of the SLWP must also accord with the Tests of Soundness. The plan takes a strong regulatory stance against new waste development which, in some places, may create a tension with the soundness test of being ‘positively prepared’. The challenge for the plan makers, as set out under Paragraph 3.23, is noted and agreed.</p> | <p>Disagree. The Councils have experience of a waste safeguarding sterilising land. The EMR site in Beddington has been vacant since 2014 when the company moved to Merton. When industrial land is at a premium, it is unreasonable to allow sites to remain vacant due to planning blight. Therefore, not safeguarding sites can be both holistic and positive planning.</p> <p>Table 16 shows there is sufficient flexibility within the existing sites to meet the shortfall three times over. Therefore, there is scope to adapt to rapid change and safeguarding existing sites is far more effective than having “Areas Suitable for Waste Management” which lack certainty regarding deliverability.</p> <p>Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not “0tpa” but “179,300tpa”. This closes the capacity gap for Construction</p> |

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| | | | and Demolition Waste and, indeed, moves the capacity into a small surplus. |
| Key Issue 4 Waste Transfer Facilities | | | |
| 37 | Environment Agency (C8) | As far as railheads and wharves go we don't think there is very much in SLWP area. There is a railhead still in Chessington we believe, is this sufficiently safeguarded by the policies in the document? | Noted. There are no wharves in the South London Waste Plan area. There are two railheads in the area: Purley (used by Days Aggregates) and Tolworth (also used by Days Aggregates). These will be safeguarded in the relevant borough's Local Plan. |
| 38 | Essex County Council (C72) | It is not agreed that safeguarding provisions should be removed from the landfill site located at Beddington Farmlands. A future safeguarding policy should make clear that the safeguarding provisions of temporary facilities, such as landfill sites, remain in place up to the time that waste importation ceases. It may also be appropriate to maintain safeguarding provisions up to the point that a site is restored depending on the nature of that restoration. This means that the policy context for the site can appropriately reflect existing circumstances throughout its lifetime. | Disagree. The landfill licence expired on 31 December 2019. There is to be some minor land spreading (contouring) and the site has to be restored by 2023. |
| Key Issue 5 Climate, Change, the End of Landfill and the Circular Economy | | | |
| 39 | Viridor (C22) | <p>In order to deliver the approved restoration profile for Beddington Farmlands, it is important to recognise that inert material will be brought to the site until 2023. As part of bringing in this material to the site, there will be associated needs for infrastructure, such as access roads and hardstanding for vehicle turning. Also, when the site is restored, there will be a need for infrastructure associated with the ongoing management and maintenance of the restored landfill, such as a livestock handling area.</p> <p>We support the move towards a circular economy, to keep products and materials circulating within the economy at their highest value for as long as possible. Based on this, waste facilities which have temporary permissions, should be reviewed for possible permanence, subject to other policies in the plan.</p> | Noted. However, the Councils have reviewed the Beddington Farmlands Restoration Plan and noticed the current proposed safeguarded site includes some of the Wandle Valley Regional Park. Therefore, the Councils will be redrawing the safeguarded site boundary for the Submission draft to align with the extent of the Wandle Valley Regional Park. |

| Vision and Objectives | | | |
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| 40 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | <p>Agree with vision, but it needs to be combined with policies aimed at reducing waste.</p> <p>Partly agree with objectives. Suitable land must be made available but it is not necessary to safeguard existing unsuitable sites.</p> | Noted. |
| 41 | Surrey County Council (C18) | <p>We support the draft South London Waste Plan's vision working towards becoming net self-sufficient by 2036 but we question the timescale and whether it is consistent with the London Plan which has a target of being net self-sufficient by 2026. Furthermore the London Plan does not include inert excavation waste in the London net self-sufficiency target. Nevertheless, we do have some concerns regarding the objectives and policies which seek to deliver this.</p> <p>We support the objectives, subject to bullet point 4 "ensure there is sufficient land for industrial uses within South London Waste Plan area's industrial estates." What is meant by this point and is it necessary to have an objective since it is not clear how this would fall within the remit of a waste plan? Furthermore, many waste uses on industrial estates are no different to other industrial processes and provide valuable employment opportunities.</p> <p>Bullet point 1 of the objectives could be clearer in regards to whether the Local Plan target for household waste and C&I waste is included in net self-sufficiency? Also, is there reasoning for why the document refers to municipal waste but does not refer to it as household and C&I waste?</p> <p>Furthermore, bullet point 6 of the objectives feels quite negative; it is important to highlight that effects of new development may also be positive e.g. recycling of waste.</p> | <p>Disagree. The GLA targets for the South London Waste Plan boroughs increase over the plan period. The boroughs are using the end of the plan period target. This means that the boroughs will be net self-sufficient in HC&I in 2026 and will be net self-sufficient in C&D in 2026 (following information provided by Days Aggregates) so the boroughs will be playing their part in meeting the overall London target.</p> <p>Agree. The South London Waste Plan is not clear. The Councils will clarify the excavation waste issue.</p> <p>Noted. The Councils have high demand from other industrial uses for industrial land so the Councils are balancing meeting their waste targets with providing land for other industrial uses.</p> <p>Noted. The London Plan target requires the South London Waste Plan boroughs to exceed their own self-sufficiency by 13%. Hence bullet point 1 is written that way. The Councils will review the terminology regarding household waste, municipal waste and local authority collected waste.</p> |

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| | | | Different sources use different terms and the Councils are aware there are slight differences in meaning between the three terms. |
| 42 | SUEZ (C20) | <p>SUEZ agrees with the overall aim and objective of the draft vision, however, would note that the following statement could be more clearly worded:</p> <p>“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” (SUEZ emphasis)</p> <p>The inclusion of the text, “for all types of waste”, could potentially be interpreted to suggest that each waste stream will be ‘net self-sufficient’. SLWP appears to be making provision to be ‘net self-sufficient’ in terms of total waste arisings, however, there are some streams such as Hazardous Waste, where there are no current facilities within the SLWP area and paragraph 5.19 suggests that there is not an intention to provide hazardous waste treatment facilities in the plan period.</p> <p>SUEZ would therefore suggest that the text “for all types of waste” can potentially be removed.</p> | Agree, The Councils will clarify the wording. |
| 43 | SUEZ (C20) | <p>SUEZ agrees with the objectives, however, suggest that the following objective is amended slightly:</p> <p>“Safeguard existing waste sites to meet these targets and needs on existing sites”</p> <p>At the present time, Benedict Wharf is an ‘existing waste site’. However, as previously outlined, SUEZ aims to relocate from this site to the more suitably located and designed BLRRF, unlocking the significant benefits set out in the SLWTP.</p> <p>SUEZ would, therefore, suggest that the objective is reworded as follows, which would also accord with the wording utilised in SLWP Policy WP3:</p> <p>“Safeguard the existing waste sites C1-S12 as set out on pages 42-90 of this</p> | Agree. The Council will clarify the wording. |

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| | | South London Waste Plan to meet these targets and needs on existing sites” | |
| 44 | Viridor (C22) | <p>Vision – We agree with the general vision to have sufficient waste management facilities to be net self-sufficient in terms of waste generation and waste management for all types of waste, on a select range of established sites.</p> <p>Objectives – We support the overall objectives, especially safeguarding existing waste sites to meet targets</p> | Noted. |
| 45 | Resident PS of Sutton (C27) | <p>Vision – Agree. Objectives – Agree. The draft objectives and vision appear sensible and sustainable and protect each of the boroughs from unwanted additional, unnecessary development for waste management purposes.</p> <p>With regard to the London Borough of Sutton, it would be good to let people know what is happening to the previously planned and announced country park that was supposed to link up land from Beddington Park through the landfill site to Merton and Mitcham Common providing a green corridor.</p> <p>One other concern is for less hazardous waste such as paint. Residents are sent away from the Kimpton Way site and told to fill out a form and get the waste collected once they have boxed it up and requested a collection from their home. For most people this is just a step too far and much of these paints will end up in the wheeled bins. If residents take the trouble to deliver it to the Kimpton Way site then it should be stored there and the Council arrange for its disposal. It's just common sense.</p> | <p>Noted.</p> <p>Noted. Beddington Farmlands is due to be restored by 2023. See: https://www.viridor.co.uk/siteassets/document-repository/community/beddington-farmlands-roadmap-v.4.pdf</p> <p>Noted. The third point will be raised with Sutton’s waste management services.</p> |
| 46 | Resident MS of Sutton (C28) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 47 | Resident OW of Sutton (C29) | Vision – Disagree. Objectives – Agree. I fear the draft vision will mean you will just burn the waste. | Noted. |
| 48 | Resident LP of Sutton (C30) | Vision – Disagree. Objectives – Disagree. The inside of my house regularly stinks of the incinerator. Looking forward to having my kids go to the new school with its | Noted. |

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| | | grounds directly next to it! | |
| 49 | Resident JA of Sutton (C31) | Vision – Agree. Objectives – Agree. | Noted. |
| 50 | Resident JS of Sutton (C32) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 51 | Resident K of Sutton (C33) | Vision – Agree. Objectives – Agree. Nice targets but how will they be met? | Noted. The document explains how the target will be met. |
| 52 | Resident ASW of Sutton (C34) | Vision – Disagree. Objectives – Disagree. The current waste collection services are not sufficient, the roads in Merton are rarely clean. More waste management facilities are required to meet demand | Noted. The Council will pass your point on to the waste collection service. |
| 53 | Resident SB of Sutton (C35) | Vision – Disagree. Objectives – Disagree. The Beddington incinerator and the traffic along Beddington Lane is horrific - the air smells plasticity and polluted, and residents breathing problems are already made worse. So worried to see things get worse when even more waste from other boroughs I'm driven through Beddington to be burnt. | Noted. Sutton Council has a programme to improve the environment along Beddington Lane and this document is proposing no new waste management sites. |
| 54 | Resident A of Sutton (C36) | Vision – Disagree. Objectives – Disagree. I object to Sutton being the dumping ground for south London | Noted. |
| 55 | Resident TP of Sutton (C37) | Vision – Agree. Objectives – Agree. | Noted. |
| 56 | Resident JM of Sutton (C38) | Vision – Agree. Objectives – Agree. | Noted. |
| 57 | Designing Out Crime Officer, Metropolitan Police (C40) | Vision – Agree. Objectives – Agree. The local Designing Out Crime Officers and the Counter Terrorism Safety Advisers should be invited to view and provide comments for any new and additional waste facility infrastructure. | Disagree. The Councils have systems in place to notify the Metropolitan Police of any major development. The Councils do not consider that the Metropolitan Police would have concerns over minor development. |

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| 58 | South London Nappies (C41) | Vision – Disagree. Objectives – Disagree. Reusable nappies need promoting and funding to keep disposables out of the waste system. This could include more voucher schemes through Real Nappies for London, which currently offer a £40 incentive voucher for Lambeth residents with a baby under 18m. | Noted. |
| 59 | NHS England (C42) | Vision – Agree. Objectives – Agree. "The plan states that with regard to [clinical] hazardous waste there are either "satisfactory arrangements in place" or "the waste stream is so small as to be insignificant or capacity improvements have already been made". | Agree. The Councils will contact NHS England regarding your precise requirements. |
| 60 | Resident LF of Sutton (C43) | Vision – Agree. Objectives – Agree. | |
| 61 | Resident JK of Sutton (C44) | Vision – Agree. Objectives – Agree. | Noted. |
| 62 | Resident KA of Sutton (C45) | Vision – Disagree. Objectives – Disagree. 4) Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates. | Agree. |
| 63 | Resident SM of Sutton (C46) | Very little detail is know so cannot comment | Noted. |
| 64 | Resident A of Sutton (C47) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 65 | Resident JH of Sutton (C48) | Vision – Agree. Objectives – Don't Know. Does this involve higher council tax and why can't Veolia pay for this due to the fact that they are contracted to supposedly deal with the waste for boroughs under the SW Partnership? | Noted. This document and its implications are at no cost to the Councils. |
| 66 | Resident ST of Sutton (C49) | Vision – Don't Know. Objectives – Disagree. It is non-specific and "woolly". It says ensure land is available to develop. What would you develop? Assume the incinerator will still be pumping out toxic waste. | Noted. The phrase "ensure land is available to develop" does not occur in the document. |
| 67 | Sutton Independent Residents/Cllr Tim Foster (C50) | Vision – Disagree. Objectives – Disagree. Beddington Lane is set to absorb more tonnes of waste than the rest of the 4 Boroughs put together - as long ago as 2009, the London Borough of Sutton recognised the excess of HGV traffic on Beddington Lane and its negative environmental impact. | Disagree. The purpose of the plan is to meet the statutory targets and allow other industrial uses to flourish. The transport impacts of the SUEZ proposal were considered as part of its planning |

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| | | <p>This plan, this vision and this imposition on a single ward of the SLWP's 4 Boroughs is a travesty that will impact the health of residents and children for a generation.</p> <p>Planning permission granted for SUEZ in Beddington Lane was a travesty - on the basis of a small and irrelevant laying of tarmac and an equally irrelevant piece of kerbstone, development was said to have started in 2014 - the judgement of a planning enforcement officer no longer in the employ of the London Borough of Sutton - extant planning permission was said to exist. The traffic plan was based on an unimplemented HGV ban in Beddington Village.</p> <p>The process is wholly unacceptable</p> | permission. |
| 68 | Resident S of Sutton (C51) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 69 | Resident of AM of Sutton (C52) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 70 | Resident LS of Sutton (C53) | Vision – Agree. Objectives – Agree. | Noted. |
| 71 | Resident AW of Sutton (C54) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 72 | Resident AS of Sutton (C55) | Vision – Agree. Objectives – Agree. | Noted. |
| 73 | Resident JK of Sutton (C56) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 74 | Resident JT of Sutton (C57) | Vision – Disagree. Objectives – Disagree. I don't agree with any of this | Noted. |
| 75 | Resident RS of Sutton (C58) | Vision – Agree. Objectives – Agree. | Noted. |
| 76 | Resident CC of | Vision – Agree. Objectives – Agree. | Noted. |

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| | Sutton (C59) | | |
| 77 | Resident LW of Sutton (C61) | Information needs to be clearer to understand with key points highlighted looking at pros and cons of objectives | Noted. |
| 78 | Resident CS of Sutton (C62) | It's a very blurred vision! A lot of words but they do not actually say anything. Very woolly and totally open to a wide variety of interpretations. | Noted. |
| 79 | Resident MF of Sutton (C63) | Haven't time to read | Noted. |
| 80 | Resident MR of Sutton (C65) | Vision – Disagree. Objectives – Disagree. Beddington Lane is incapable of dealing with its current traffic and does not need anymore | Noted. However, the purpose of the plan is to meet the statutory targets and allow other industrial uses to flourish. |
| 81 | Resident RD of Sutton (C66) | Vision – Disagree. Objectives – Disagree. | Noted. |
| 82 | Resident Anonymous of Sutton (C67) | Vision – Disagree. Objectives – Disagree. As a resident in Beddington I am concerned about both the environmental impact on the area and the increase of traffic along Beddington Lane. Beddington Lane is already a concern for me as a regular pedestrian who has had several near misses at the zebra crossing by the BP Garage and often have to walk alongside stationary or slow moving congested traffic. | Noted. However, the purpose of the plan is to meet the statutory targets and allow other industrial uses to flourish. |
| 83 | Resident PML of Sutton (C68) | Vision – Agree. Objectives – Agree. | Noted. |
| 84 | Resident PMC of Sutton (C69) | Vision – Disagree. Objectives – Disagree. Do not agree with the objective of managing waste from other boroughs. Do not agree with incinerating waste Do not agree with handling nuclear waste. | Noted. |
| 85 | Essex County Council (C72) | The Vision and Objectives are supported. | Noted. |
| 86 | Resident A of Kingston (C73) | Vision – Don't know. Objectives - Don't know. | Noted |

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| 87 | Resident B of Kingston (C74) | Vision - The proposed building and re-development plans are outrageous and TOTALLY unsupportable making this so-called "Vision" unnecessary and a complete waste of time and money. Objectives – No. | Noted |
| 88 | Resident C of Kingston (C75) | Vision – Agree. Objectives –Agree. | Noted |
| 89 | Resident D of Kingston (C76) | Vision - Disappointed that Cox Lane site is to close although it is being misused by residents. It is in an Industrial Estate but the site seems small for other industrial use. May result in more vehicle use by local residents. Objectives – Cox Lane is to close. | Noted. |
| 90 | Resident E of Kingston (C77) | Vision – Agree. Objectives – Agree. | Noted |
| Policy WP1: Strategic Approach to Household and Commercial and Industrial Waste | | | |
| 91 | The Mayor of London/GLA (C6) | <p>The Mayor would not expect the statements made at paragraph 5.3 regarding submissions made at the examination in public of the draft London Plan to be included in the SLWP. Particularly as the Panel Report on the draft London Plan found that "overall the [apportionment] methodology is logical, thorough, is consistently applied across boroughs and well understood. As a mechanism to assess capacity, it is justified".</p> <p>Please note that figure 11 incorrectly identifies the arisings and apportionment figures for the Borough of Sutton please update in line with the Intend to Publish version of the draft London Plan.</p> | <p>Disagree. The Councils' representation is a matter of public record.</p> <p>Agree. The London Plan "Intend to Publish" has different figures. The 2021 arisings for Merton should read 174k not 173k and the 2021 apportionment figure for Sutton should read 211k and not 210k. However, these are immaterial as it is the 2036 figures that are important.</p> |
| 92 | Environment Agency (C8) | <p>"... (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3)."</p> <p>(1) P23 WP1 (d) We don't agree with this policy as we would have thought that there might be a need for temporary transfer stations especially w.r.t new housing developments.</p> <p>(2) There may also be a need to specifically exclude activities that relate to</p> | <p>(1) Disagree. The Councils do not consider there is a need for temporary waste facilities associated with housing developments as existing companies within the South London Waste Plan area are experienced in handling C&D waste from large developments. See days Aggregates representation below.</p> |

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| | | <p>promoting the circular economy and greater use of resources, especially for smaller scale operations.</p> <p>(3) Also 173k tonnes capacity is a lot to find from existing sites – this equates to around 7 Hectares using the Hertfordshire CC assumption for waste throughput per Hectare in a more circular economy, so one would expect to see at least a couple of Hectares set aside. A more conservative estimate of around 45k tonnes per Hectare as used in the Draft North London Waste Plan would still require 3 or 4 Hectares or the equivalent.</p> | <p>(2) Disagree. The lower tonnes per hectares throughputs for circular economy activities assumes that the dismantling and re-making will occur on the same site. The Councils consider that it is highly likely that the dismantling would take place at a waste site but the dismantled elements would then become raw materials for re-manufacture at a different location (in effect a factory). The re-manufacture would not then be a waste use but a typical B2 use. The dismantling sites would be equivalent to the household, commercial and industrial waste transfer stations which operate, according to the Hertfordshire study, at 50,000 tonnes per hectare. This is above many of the South London Waste Plan's safeguarded sites.</p> <p>(3) Disagree. 173,000 tonnes equates to 11,531 tonnes per annum, which is a small amount across 46 sites, the majority of which are not calculated on their highest recent capacity. As stated above, since the South London Waste Plan deals only with existing sites, tonnage per hectare is an irrelevant calculation. However, we note that the Hertfordshire study (page 35) states the average capacities for C&D treatment is 60,000 tonnes per hectare.</p> <p>Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not "0tpa" but "179,300tpa". This</p> |
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| | | | closes the capacity gap for Construction and Demolition Waste and, indeed, moves the capacity into a small surplus. |
| 93 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | It is a nonsense to safeguard existing unsuitable sites whilst restricting the creation of new sites on suitable land (e.g. Beddington Water Works). | Disagree. The Beddington Sewage Treatment Works is a critical piece of south London infrastructure and one of only two sewage treatment works located within the four boroughs. |
| 94 | Surrey County Council (C18) | We agree with Policy WP1 subject to point (d) which is too restrictive and cannot be justified. Apportionment does not place a cap on waste management capacity particularly where this can be justified in terms of managing waste at the highest point practicable on the waste hierarchy. There should be a criteria based policy that deals with windfall applications and refers to the need to drive waste up the waste hierarchy as stated in the National Planning Policy for Waste (NPPW). | Disagree. The plan is trying to balance the requirement to meet the London Plan targets with providing enough land for the high demand for non-waste industrial uses. There is no reference to windfall sites in the NPPF |
| 95 | SUEZ (C20) | <p>SUEZ express caution about the wording of Policy WP1 (d), as follows:</p> <p>“New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).</p> <p>The waste industry is undergoing a period of significant change and transitioning towards a more circular economy. On 18 December 2018, the Department for Environment, Food & Rural Affairs (DEFRA) and the Environment Agency (EA) published ‘Our Waste, Our Resources a Strategy for England’. The strategy aims to make rapid progress in revolutionising recycling, supporting change towards circular systems and promoting UK based recycling. The strategy was followed by a range of consultations on extended producer responsibility, plastic packaging tax, deposit return schemes and household collections.</p> <p>The exact needs and responses to emerging policy and legislation are not yet known and will become clear in the near future. Therefore, there is a risk that this policy could prove to be too restrictive over the lifetime of the plan. Paragraph 11 of the National Planning Policy Framework (NPPF) states:</p> | <p>Disagree. Much of the focus of ‘Our Waste, Our Resources a Strategy for England’ is on reducing waste, suggesting that the 5% reduction in waste applied by the Mayor in the arisings and apportionment targets is very conservative. Consequently, the South London Waste Plan boroughs may be safeguarding too many sites.</p> <p>The Councils consider there is flexibility. As shown in Table 16, there is a huge amount of untapped capacity on the existing sites with 528,231 tonnes for C&D waste and further untapped capacity within the existing sites managing HC&I. Consequently, new facilities not providing compensatory provision are not required.</p> |

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| | | <p>“11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;” (SUEZ Emphasis)</p> <p>SUEZ, therefore, recommend that the policy is reworded to allow facilities that meet an identified need (or similar wording) as well as compensatory provision.</p> | |
| 96 | Viridor (C22) | <p>(c) Although we agree with the objective to meet targets by intensification of existing waste sites, this may not necessarily be realistic due to a sites' operational requirements. Therefore, extensions should also be included in meeting targets as a priority over vacant sites. In addition, capacity at some waste sites offers contingency for the site itself and/or other waste sites to utilise when operations are disrupted.</p> <p>(d) Waste Transfer Stations are often needed to support modern waste treatment facilities. Although a transfer facility is not needed while the ERF is operational, the waste needs to be accepted somewhere during any period the ERF is unavailable due to management or maintenance issues. At present, the Recycling Centre at Beddington is able to meet this need, before it is taken to an alternative treatment facility. The use of the Recycling Centre means that the waste is managed adjacent to the ERF, which has co-location benefits, such as same access, weighbridge, no vehicles diversions and also less landtake.</p> <p>Although there are a number of Transfer Station sites, such as Garth Road, Factory Lane and Villiers Road in the SWLP area, these are not readily available to use as a contingency to receive waste if the ERF is unavailable. A number of existing Transfer Station sites are utilised to serve SLWP contracts by various waste services providers, and are therefore unavailable.</p> <p>The strategy of intensifying existing waste sites and developing vacant/non-operational sites to meet apportionment target places a significant weight on the assumption that 777 Recycling Centre at 154a Beddington Lane maximises its throughput for household, industrial and commercial wastes and that 156 Beddington Lane is released for other uses. It is also assumed that Therapia Lane, UK And European Construction / Ranns and the non-operational</p> | <p>Noted. However, the Councils have reviewed the Beddington Farmlands Restoration Plan and noticed the current proposed safeguarded site includes some of the Wandle Valley Regional Park. Therefore, the Councils will be redrawing the safeguarded site boundary for the Submission draft to align with the extent of the Wandle Valley Regional Park.</p> <p>Noted. The Councils will be publishing information about sites with potential intensification opportunities for the Submission version of the plan.</p> |

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| | | SafetyKleen site contribute towards construction, demolition and excavation waste. We would question the soundness of a plan based on these assumptions unless their deliverability in the plan period can be clearly demonstrated. | |
| 97 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 98 | Resident MS of Sutton (C28) | Do not support draft policy. Less burning of rubbish more recycling. I do not agree with the approach of safeguarding existing sites only. | Noted. |
| 99 | Resident OW of Sutton (C29) | Do not support draft policy. There will be too burning of waste in reality. I agree with the approach of safeguarding existing sites only. | Noted. |
| 100 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator. I do not agree with the approach of safeguarding existing sites only. Shut down the incinerator. | Noted. |
| 101 | Resident JA of Sutton (C31) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 102 | Resident JS of Sutton (C32) | Do not support draft policy. I agree with the approach of safeguarding existing sites only. | Noted. |
| 103 | Resident K of Sutton (C33) | I do not agree with the approach of safeguarding existing sites only. I think each borough should have their own waste site. This will reduce the amount of HGVs trundling along the roads. In particular, Beddington Lane | Noted. |
| 104 | Resident ASW of Sutton (C34) | Do not support draft policy. | Noted. |
| 105 | Resident SB of Sutton (C35) | Do not support draft policy. Pollution impacts felt by residents. I do not agree with the approach of safeguarding existing sites only. | Noted. |
| 106 | Resident A of Sutton (C36) | Do not support draft policy. I do not agree with the approach of safeguarding existing sites only. | Noted. |
| 107 | Resident TP of Sutton (C37) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |

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| 108 | Resident JM of Sutton (C38) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 109 | South London Nappies (C41) | Do not support draft policy. Reusable nappies need to be promoted to reduce landfill. E.g. voucher scheme through Real Nappies for London | Noted. |
| 110 | NHS England (C42) | Do not support draft policy. We disagree with Policy WP1 (c) and (d) as we believe that the area needs additional facilities to dispose of hazardous clinical waste." | Noted. The Councils will be in contact about this matter. |
| 111 | Resident LF of Sutton (C43) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 112 | Resident JK of Sutton (C44) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 113 | Resident A of Sutton (C47) | Do not support draft policy. I agree with the approach of safeguarding existing sites only. | Noted. |
| 114 | Resident JH of Sutton (C48) | Support draft policy. Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. I agree with the approach of safeguarding existing sites only. How much is this all going to cost? Will this be another failure from Sutton Council like the one in hiring Veolia? | Noted. The plan and its implications come at no cost to the Councils. |
| 115 | Resident ST of Sutton (C49) | I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 116 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. I do not agree with the approach of safeguarding existing sites only. | Noted. |
| 117 | Resident S of Sutton (C51) | Do not support draft policy. I do not agree with the approach of safeguarding existing sites only. | Noted. |
| 118 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |

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| 119 | Resident LS of Sutton (C53) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 120 | Resident AW of Sutton (C54) | We don't want you to safeguarding existing waste sites and encouraging intensification of these sites we want the removal of the incinerator from the borough this is not a Green and healthy way of dealing with waste . How can I answer when I get pages 29 & 30 to look at when I read the pages from the hyperlink above and not page 24? I do not agree with the approach of safeguarding existing sites only. The incinerator site in Beddington needs to be decommissioned and we need to stop the pollution and traffic bringing waste into the borough | Noted. |
| 121 | Resident AS of Sutton (C55) | Support draft policy. I do not agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 122 | Resident JK of Sutton (C56) | Do not support draft policy. I do not agree with the approach of safeguarding existing sites only. | Noted. |
| 123 | Resident JT of Sutton (C57) | Do not support draft policy. | Noted. |
| 124 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 125 | Resident CC of Sutton (C59) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 126 | Resident LW of Sutton (C61) | Support draft policy. However there will need to be better facilities to achieve this. We will likely need more or better sites. | Support welcomed. |
| 127 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 128 | Resident RD of Sutton (C66) | Do not support draft policy. | Noted. |
| 129 | Resident Anonymous of | Do not support draft policy. I do not agree with the approach of safeguarding existing sites only. | Noted. |

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| | Sutton (C67) | | |
| 130 | Resident PML of Sutton (C68) | Support draft policy. I agree with the approach of safeguarding existing sites only. | Support welcomed. |
| 131 | Resident PMC of Sutton (C69) | Do not support draft policy. | Noted. |
| 132 | Northamptonshire County Council (C71) | The Council are concerned by the outright ban on new waste sites as per WP1(d) – the Council is concerned this seems too restrictive. We understand that the Boroughs have growth and development pressures and that they have existing capacity that is sufficient (and focus on intensification / compensatory measures etc), but an outright ban doesn't seem to be in line with national policy/guidance. A strict criteria based approach might be more appropriate/sound. | The Councils consider that, such is the scarcity of industrial and given the fact that the apportionment can be accommodated, a restriction on new sites is justified, if unusual. |
| 133 | Essex County Council (C72) | <p>The primacy of the London Plan when it comes to setting waste management targets is noted. It is considered that the plan makers may need to respond to any changes in these targets prior to the adoption of the London Plan, or as part of any future review of the London Plan, but that the figures in the emerging London Plan are unlikely to change prior to its adoption.</p> <p>Given that sufficient management capacity is available at existing sites to accommodate the amount of waste apportioned to the South London Boroughs, it is considered appropriate that no further specific waste allocations are made. It is however not agreed that a policy stance of not permitting new (HIC) waste sites at all unless they fall under the terms of 'compensatory provision' is appropriate.</p> <p>This approach appears to not be in conformity with PPG: Waste Paragraph: 046 Reference ID: 28-046-20141016, which sets out that unallocated sites may be appropriate for waste management where 'there may be significant changes in, for example, technological impact and land ownership that occur over a short period of time and provide opportunities that were not anticipated.' The same paragraph further states that 'In the case of waste disposal facilities, applicants should be able to demonstrate that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the Waste Hierarchy.' The final plan should consider including criteria-based policies under which future waste management facilities can be appropriately guided and subsequently</p> | <p>Disagree. The targets are in conformity with the waste apportionments set out in the London Plan Intend to Publish document.</p> <p>The Councils need to balance the need for industrial land with the waste facilities. The spare capacity between what we have called apportionment and maximum throughput provides sufficient flexibility. The Councils will consider a waste operations position in the waste hierarchy practicably.</p> |

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| 134 | Resident A of Kingston (C73) | Don't know | Noted. |
| 135 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 136 | Resident C of Kingston (C75) | Support draft policy | Support welcomed. |
| 137 | Resident D of Kingston (C76) | I agree with SW London Waste Management Plan's objection to the New London Plan. Does Wp1 (b) account for this? If so I agree. | Part (b) meets the Draft London Plan target |
| 138 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |

Policy WP2 Strategic Approach to Other Forms of Waste

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| 139 | Thames Water (C5) | <p>We support Policy WP2 (d) relating to development for improvements/enhancement of sewage treatment works.</p> <p>Wastewater/sewerage infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 28 relates to non-strategic policies and states "Non-strategic policies</p> | Support welcomed. |
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| | | <p>should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of Infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph 001, Reference ID 34-001-20140306).</p> | |
| 140 | Environment Agency (C8) | <p>"(b) New sites (either transfer or management) for Construction and Demolition waste should be for compensatory provision only (see Policy WP3)."</p> <p>(1) P28 WP2 b) Object to this as mentioned above as temporarily TSs for C+D may be needed and there is a danger that illegal TSs may be set up in the area as an unintended consequence of this policy</p> <p>(2), (3), (4) "(c) New sites (either transfer or management) will not be supported for radioactive waste, agricultural waste and hazardous waste."</p> <p>We would like to see the justification for this policy as the Plan should take into account the 'greater than local need' under the NPPW and the London Plan for this type of facility.</p> <p>It runs counter to the idea of 'self-sufficiency' in the NPPW, etc.</p> <p>(5) Also, the definition of Hazardous waste very broad -it includes Waste Electrical and Electronic goods (WEEE) - and the need for smaller facilities in a more Circular Economy etc. - would mitigate sites handling WEEE and some other</p> | <p>(1) Disagree. The Councils do not believe there is a need for temporary waste facilities associated with housing developments as existing companies within the South London Waste Plan area are experienced in handling C&D waste from large developments.</p> <p>(2) Noted. The rationale for not providing radioactive waste facilities is: 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</p> |

waste streams, which may fall under this definition.

small amounts of permitted radioactive wastewater to the sewer. There are no solid transfers of this type of waste in any of the facilities.

(3) The rationale for not providing agricultural waste facilities is: 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.

(4) The rationale for not providing hazardous waste facilities: In 2021 the hazardous waste arisings are predicted to be 21,242 tonnes per annum and this is 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 only 370 tonnes per annum by 2036 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.

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| | | | (5) The Councils have found a number of businesses operating in the WEEE circular economy amongst the Environment Agency Exempt Sites. They are often in shops. Their throughput is so small that it was considered too onerous on the business to safeguard the site for waste as they may move premises quite often. |
| 141 | The Mayor of London/GLA (C6) | <p>The London Plan requires boroughs to identify sufficient sites to manage household and commercial and industrial waste through allocating apportionments based on an allocated percentage and the expected arisings for these waste streams. Figure 16 in the SLWP sets out the management capacity available in the SLWP area for construction and demolition waste. The final column in this figure refers to 'throughput counting towards Apportionment'. As the term apportionment has a specific meaning in the context of waste management within London, and in order to avoid confusion, it is recommended this is changed to 'throughput contributing to waste management'.</p> <p>It is noted that hazardous waste generated within the SLWP area is currently being managed in specialist facilities outside the area. It is important that the SLWP provides evidence that the site/s managing its hazardous waste arisings have sufficient capacity to manage the expected arisings over the plan period. There should also be a commitment to keep the management of this waste stream under review over the plan period.</p> | <p>Agree. The Councils will amend this reference.</p> <p>Noted. The Councils are investigating hazardous waste facilities through its Duty to Cooperate activities. They commit to keep the matter under review though a monitoring policy and table.</p> |
| 142 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | It is a nonsense to safeguard existing unsuitable sites whilst restricting the creation of new sites on suitable land (e.g. Beddington Water Works). | Disagree. The Beddington Sewage Treatment Works is a critical piece of south London infrastructure and one of only two sewage treatment works across the two boroughs. |
| 143 | North London Waste Plan Boroughs (C17) | In terms of Construction, Demolition and Excavation waste, the document does not take notice of the new London Plan's separate targets for reuse, recycling and recovery of Construction and Demolition waste and for beneficial use of Excavation waste | Agree. The Councils will amend the section on C&D waste to include excavation. The landfill site ceased to accept waste in 2019. In Figure 16 of the Issues and Preferred Options document, the total the council are |

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| | | <p>In practice, the Issues and Preferred Options does consider C&D and E waste separately. WP2 is concerned with Construction and Demolition waste only. However there appear to be no policies covering Excavation waste, strategic or specific. This is surprising in that the SLWP area contains at least one landfill site that accepts inert waste.</p> <p>The approach to C&D, prefigured in Key Issue 4, is that more intensive use and more active waste management at C&D facilities, will deal with the identified capacity gap. The evidence for this within the document is not clear. The Issues and Preferred Options document presents Figure 16 Construction and Demolition Waste Facilities and Throughput Potential. This appears to contrast “Maximum” (throughput achieved?) with “Licence” (Licenced capacity?). Licenced capacity, as no doubt mentioned elsewhere in the documentation, is a very unreliable guide to potential capacity as the Environment Agency give licences out in tonnage ranges.</p> <p>Later in the safeguarded sites section under the opportunity to increase waste managed there is discussion about “throughput per hectare for the type of facility”. This facility type approach is likely to be better evidence for the potential to expand and intensify. Any such evidence needs to take into account that waste management facilities further up the waste hierarchy tend to have a larger footprint than facilities further down.</p> <p>There are a number of assumptions built into such an approach to increasing capacity for C&D and it will be important to actively monitor whether this happens.</p> | <p>counting towards their C&D waste management is 241,682 tonnes. The maximum throughput achieved on each site is 769,913 tonnes per annum. Therefore, the intensification possible is 528,231 tonnes per annum – far in excess of the current shortfall of 172,698 tonnes per annum. The Councils do not include licensed capacity at all.</p> <p>Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not “0tpa” but “179,300tpa”. This closes the capacity gap for Construction and Demolition Waste and, indeed, moves the capacity into a small surplus.</p> <p>Noted. The opportunity to intensify is done on a facility type basis.</p> <p>Agree. The Councils will include a monitoring policy and table.</p> |
| 144 | Surrey County Council (C18) | <p>Overall we support Policy WP2. However, in regards to point (b), whilst it is less likely new sites will come forward for Construction and Demolition waste, there is no justification for discounting this eventually and any applications need to be dealt with as windfall sites in the same way as municipal and C&I waste above. The data provided for C, D&E waste is not persuasive, and, whilst it is acknowledged that reliable data is not easy to generate, more detailed evidence is required to justify the statement in paragraph 5.14.</p> <p>In paragraph 5.16 the term ‘licence’ thresholds may be misleading because ‘licence’ capacities are broad charging bands and do not reflect capacity very well. In addition to this, further clarification needed around figure 16 which shows an</p> | <p>Agree. The Councils will provide more evidence for C&D intensification in due course.</p> <p>Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not “0tpa” but “179,300tpa”. This closes the capacity gap for Construction and Demolition Waste and, indeed, moves the capacity into a small surplus.</p> |

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| | | apportionment for C&D waste but there is no apportionment for this waste stream. Where has excavation waste been separated from C&D waste and what is the plan for dealing with excavation waste? | Noted. However, the Councils do not use licensed capacity anywhere in waste management calculations. Agree. Excavation waste will be included in the next iteration of the plan. |
| 145 | SUEZ (C20) | Consistent with our comments on Policy WP1, SUEZ consider that parts (b) and (c) of Policy WP2 could be amended to ensure flexibility. | Disagree. |
| 146 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 147 | Resident MS of Sutton (C28) | Do not support draft policy. | Noted. |
| 148 | Resident OW of Sutton (C29) | Support draft policy. | Support welcomed. |
| 149 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator | Noted. |
| 150 | Resident JA of Sutton (C31) | Support draft policy. | Support welcomed. |
| 151 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 152 | Resident ASW of Sutton (C34) | Do not support draft policy. | Noted. |
| 153 | Resident SB of Sutton (C35) | Do not support draft policy. Should be managed across boroughs - impact on one place only is huge. | Noted. |
| 154 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |

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| 155 | Resident TP of Sutton (C37) | Support draft policy. | Support welcomed. |
| 156 | Resident JM of Sutton (C38) | Support draft policy. | Support welcomed. |
| 157 | South London Nappies (C41) | Do not support draft policy. Reducing hazardous nappy waste means promoting reusable nappies to reduce landfill. E.g. voucher scheme through Real Nappies for London | Noted. |
| 158 | NHS England (C42) | Do not support draft policy. We disagree with Policy WP2 (c) as we believe that the area needs additional facilities to dispose of hazardous clinical waste | Noted. The Councils will be in contact regarding this matter. |
| 159 | Resident LF of Sutton (C43) | Do not support draft policy. | Noted. |
| 160 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 161 | Resident A of Sutton (C47) | Support draft policy. | Support welcomed. |
| 162 | Resident JH of Sutton (C48) | Support draft policy. Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Support welcomed. The plan and its implications come at no cost to the Councils. |
| 163 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. | Noted. |
| 164 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 165 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |

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| 166 | Resident AW of Sutton (C54) | This questionnaire is fundamentally flawed as one need to have read and understood the in excess of 50 pages report and larger appendix and it is fragmented and is written to give the appearance of consultation | Noted. |
| 167 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 168 | Resident JK of Sutton (C56) | Do not support draft policy. | Noted. |
| 169 | Resident JT of Sutton (C57) | Do not support draft policy. | Noted. |
| 170 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 171 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 172 | Resident LW of Sutton (C61) | Sewage works definitely needs improving to prevent killing the Wandle again | Noted. However, Policy WP2 allows for improvements at the Beddington Sewage Treatment Works. |
| 173 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 174 | Resident RD of Sutton (C66) | Support draft policy. | Support welcomed. |
| 175 | Resident Anonymous of Sutton (C67) | Do not support draft policy. | Noted. |
| 176 | Resident PML of Sutton (C68) | Support draft policy. | Support welcomed. |
| 177 | Essex County Council (C72) | The reasoning behind the absence of any need to make further provision for C&D waste appears unsubstantiated. It is considered that there is no evidence to | Disagree. Table 16 provides evidence that the commercial facilities are not performing |

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| | | <p>suggest that commercial facilities are ‘under-performing’. It is not justified why a commercial facility would deliberately do so. Paragraph 5.16 states that the per annum shortfall in capacity could ‘easily’ be eradicated if some of the sites refocused their operations from transfer to management. The role that the South London Boroughs could play in enforcing any such change in operations is not understood. The same paragraph states that the shortfall in capacity could also be eradicated if some of the facilities processed waste at volumes close to their licensed capacities. The paragraph goes on to say that this is recognised as not being possible at some sites but that there is scope on ‘some’ of the sites to remove the shortfall. This reasoning is not considered to be robustly evidenced and, further, it is questioned how the South London Boroughs could enforce a private company to increase capacity on-site to accommodate all or part of the total shortfall (if indeed this was physically possible amongst the sites considered to be able to expand).</p> | <p>to capacity. The Councils intend to publish a document on delivery to meet the shortfall with the next iteration of the plan.</p> <p>Update to Construction and Demolition Capacity: As a result of the consultation, Days Aggregates has explained that their throughput of waste management on Site C4 is not “0tpa” but “179,300tpa”. This closes the capacity gap for Construction and Demolition Waste and, indeed, moves the capacity into a small surplus.</p> |
| 178 | Essex County Council (C72) | <p>It is not considered appropriate to state, in clause b, that new sites for Construction and Demolition waste should be restricted to compensatory provision only. The justification for this stance as set out in paragraphs 5.14 – 5.16 is not considered to be suitably evidenced or justified to make such an approach sound.</p> <p>With regard to clause c, it is also not considered appropriate to state that new sites (either transfer or management) will not be supported for radioactive waste, agricultural waste and hazardous waste. A Local Plan must be able to respond positively and flexibly to any changes in need (NPPF Paragraph 11) and this is considered to be an inflexible approach. The small amount of waste of these types arising in the South London planning area is acknowledged but the NPPW is clear that there is a need to ‘consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities identified nationally’. A policy prohibiting facilities of these types is considered to run contrary to this requirement.</p> | <p>Disagree. Evidence has shown there is no need for radioactive waste and agricultural waste and the amount of hazardous waste generated is so small and to increase only marginally over the plan period that existing arrangements for hazardous waste will suffice. Having said that, the Councils are considering/may amend the policy to allow an additional waste facility for healthcare waste, subject to information from NHS England.</p> |
| 179 | Resident A of Kingston (C73) | Don't know | Noted. |
| 180 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |

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| 181 | Resident C of Kingston (C75) | Support draft policy | Support welcomed. |
| 182 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |
| WP3 The Safeguarding of Existing Waste Sites | | | |
| 183 | The Mayor of London/GLA (C6) | <p>(1) Paragraph 5.25 of the draft Waste Plan indicates that a borough outside the SLWP area can encourage a waste facility to relocate in the SLWP area, with this an effective 'transfer of apportionment'. It is important to reiterate that one borough cannot 'transfer its waste apportionment' to another borough without the written agreement of both parties. Through the preparation of Development Plans boroughs or groups of boroughs are required to plan for identified waste needs and allocate sufficient sites, areas and existing facilities to provide the capacity needed to meet individual or pooled waste management apportionment requirements.</p> <p>Compensatory Capacity and New Waste Sites</p> <p>(2) Draft London Plan policy SI9 requires waste plans to be adopted before considering the loss of waste sites, with any proposed release of current waste sites undertaken through a plan-led process. The SLWP should include references to this approach. As outlined in the draft London Plan, if waste sites are released through an ad-hoc process then compensatory capacity must at least meet, and should exceed, the maximum achievable throughput of the site. The draft London Plan suggests the maximum throughput of the site over the past five years should be used to determine this maximum, or equivalent. In addition, if a waste site is proposed to be lost outside of a plan-led process, then compensatory capacity must be made within London prior to its loss. Policies WP3 and WP4 and supporting text must be amended to reflect the requirements of Policy SI 9 of the draft London Plan.</p> <p>(3) Any sites that are not required for waste management capacity should first be offered to other London boroughs for waste management prior to being released.</p> <p>(4) Whilst the draft London Plan suggests that LSIL and SIL sites, existing waste</p> | <p>(1) Noted.</p> <p>(2) Noted. The Councils have experience of trying to operate the maximum compensatory capacity policy and would welcome clarification, ideally, by means of examples of how it would work. The equivalent of existing throughput is a far more deliverable policy as contracts and traffic movement limitations may mean the maximum throughput may not be achievable. Therefore, the Councils consider the compensatory provision on a case-by-case basis is the optimal solution.</p> <p>(3) Disagree strongly. The Councils should not be required to offer sites to other London boroughs when they have such a pressing need for industrial land for other industrial uses and already planning for 13% than their collective arisings.</p> <p>(4) Disagree. Since the GLA's apportionment figures can be met on existing sites, there is no justification for allocating further sites which could be sterilised for other industrial uses.</p> |

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| | <p>management sites, and safeguarded wharves are suitable locations for the location of waste sites, this list is not exhaustive and does not prohibit waste sites coming forward in areas outside of these land use designations. Draft Policy WP4 should not restrict the location of where future waste sites may come forward.</p> <p>Circular economy and the waste hierarchy</p> <p>(5) The Mayor supports the draft SLWP's ambitions to introduce circular economy principles into the management of waste. However, taking a 'flexible approach' to the implementation of the waste hierarchy and 'attempts' to adhere to national and regional guidance, in paragraph 5.26, as stated above, are not supported. The proposed application of the waste hierarchy on a case-by-case basis is too flexible and the waste plan should promote its application.</p> <p>The SLWP should recognise that the approach to waste management set out in the draft new London Plan is based on the principles of the waste hierarchy in The Waste (England and Wales) Regulations 2011. The obligation to apply the waste hierarchy is a duty under Section 12 of that Act.</p> <p>As stated above, as currently drafted the SLWP would not be in conformity with the London Plan due to its potential weak implementation of the waste hierarchy on which the Mayor's strategic approach for the management of London's waste is based. The waste hierarchy should not be implemented flexibly, on a case by case basis but should instead be applied firmly and in accordance with draft new London Plan Policies SI8 and SI9.</p> <p>Intensification</p> <p>(6) The draft waste plan in Appendix 1 identifies the sites it considers to be suitable for potential intensification. However, the draft plan does not set out a clear, consistent and rational methodology for how it was determined which sites are suitable and those which are not. The expected timelines for this intensification and an indication of any capital investment required should be included. It would be helpful to more clearly set out how the SLWP will achieve net self-sufficiency in the management of construction and demolition waste through the intensification of existing sites, including evidence from site operators. The ability of sites to accommodate increases in waste capacity should be assessed against the criteria laid out in Policy SI8D of the draft new London Plan and evidence from the</p> | <p>(5) Noted. The sentence in former paragraph 5.26 that referred to the flexible implementation on a case by case bases, has been removed. It is evident from the wording in WP3 part e, that the councils will be applying the waste hierarchy. The 2011 South London Waste Plan required applications to manage waste as far up the waste hierarchy as possible. This proved impractical for small, waste-related applications, such as extensions to sheds for skip sorting – it would have been unreasonable for the councils to refuse such an application just because it was not managing waste further up the waste hierarchy. Therefore, the councils consider that it would be reasonable and helpful to point out that there may be occasions where the nature of a waste facility means that waste operations cannot easily rise up the waste hierarchy by intensification</p> <p>(6) Noted. The rationale for sites identified with potential for intensification comes from the accompanying technical report. The Councils intend to do more work on intensification opportunities and delivery for the submission draft.</p> |
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| | | site/facility operator. | |
| 184 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | The suitable sites should be safeguarded but some are obviously unsuitable because of issues of accessibility and also the loss of amenity to a predominantly residential environment. This particularly applies to smaller sites. Safeguarding should be decided on a 'case by case' basis; it is illogical and unconstitutional to do otherwise. | Noted. The Councils will comment on the Curley Skip Hire site under Site C3. |
| 185 | Surrey County Council (C18) | <p>We support the majority of this policy, however we suggest in point (a) of the policy reference should be made to the AMR for the most up to date list of sites since any new sites would not be covered by the policy. Also, we feel point (c) is not clear; what does a 'case-by-case basis' actually mean?</p> <p>We also raise some concerns with the following two sites which have been identified as existing waste uses which should be safeguarded: Site K1 - Chessington Equestrian Centre and Site C9 - Pear Tree Farm <i>[see specific comments below]</i></p> | <p>Agree. The Councils will amend the text to include compensatory sites as they occur in the plan period and reference AMRs.</p> <p>Noted. The Councils have experience of trying to operate the maximum compensatory capacity policy and it is difficult to implement. The equivalent of existing throughput is a far more deliverable policy as contracts and traffic movement limitations may mean the maximum throughput may not be achievable. Therefore, the Councils consider the compensatory provision on a case-by-case basis is the optimal solution.</p> |
| 186 | Veolia (C19) | With regard to paragraph 5.24, we fully support the statement that "... the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughout on the site." This is reflected in proposed Policy WP3(b). | Noted. |
| 187 | SUEZ (C20) | SUEZ note the comments at Paragraph 5.25 regarding the assessment of compensatory provision and the requirement within the draft London Plan (paragraph 5.52 within The London Plan – Intend to Publish Version December 2019) that this constitutes the maximum throughput achieved over the last five years. We agree that this requirement is prescriptive and that there are sometimes other considerations and metrics that may be equally important to consider on a case by case basis. However, the London Plan policy does provide some certainty for developers that more historic throughputs which may date back to when a | <p>(1) Disagree. The Councils consider that the suggested wording is unnecessary.</p> <p>(2) Disagree. The Councils have assessed need as part of the preparation of the plan and confident the plan is robust enough to deal with any unexpected eventualities.</p> |

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| | <p>facility operated as 'transfer only', cannot be used as a benchmark for compensation.</p> <p>(1) SUEZ, therefore, expresses caution regarding the proposed wording of part (c) of Policy WP3 and suggest that it is amended to:</p> <p>“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, but not exceeding the maximum throughput achieved over the last five years.”</p> <p>(2) SUEZ also express caution at the wording of part (d) of Policy WP3 in seeking to restrict compensation for facilities outside of the South London Waste Plan area. Paragraph 3.6 of SLWP acknowledges that “different types of waste are managed in different facilities which often need a wide catchment to be economically viable” and Key Issue 3 describes the scarcity of land affecting the SLWP area, but in SUEZ’ experience, this often apply at a more regional level. The text at paragraph 9.8.10 of the London Plan (Intend to Publish Version December 2019) was designed to ensure that sites that have already been compromised or could otherwise be released to fulfil wider strategic objectives are not frustrated by the availability of land or sites in those specific waste plan areas. The presumption in favour of sustainable development as set out at paragraph 11 in the National Planning Policy Framework (NPPF) should apply whether a facility is proposed to meet a new identified need or for compensatory provision. It is the role of the development management process to weigh the impacts of any planning application against the benefits and this should be set in a neutral context rather than imposing a restriction through planning policy that automatically presumes against the development.</p> <p>(3) Furthermore, the wording of the policy and accompanying text at paragraph 5.25 suggesting that it may result in the four boroughs becoming a “waste dumping ground”. Public perception of the waste and recycling industry can be a key factor in the delivery of new facilities and the SLWP has the potential to set a more positive tone in this regard. Modern waste and recycling infrastructure is often difficult to differentiate from industrial facilities. One of our developments has been praised as an ‘exemplar’ by The Commission for Architecture and the Built</p> | <p>(3) Noted. This paragraph has now been revised.</p> <p>(4) Agree. The Councils will consider amending paragraph 5.26.</p> |
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| | | <p>Environment another was awarded Sustainable Project of the Year. Many are valued by the local community once they begin to operate.</p> <p>The text also fails to recognise the significant benefits associated with these developments, ranging from sustainability and education to employment.</p> <p>(4) Part of paragraph 5.26 is unclear and requires clarification: "...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"</p> | |
| 188 | Viridor (C22) | <p>(a) We support the safeguarding of all existing waste sites. This includes the site identified as Site S2 – Beddington Farmlands Energy Recovery Facility, Beddington Waste Management Facility. We support the inclusion of this area as outlined in red, which includes the Recycling Centre, ERF, Gas plant and tipping pad. The throughputs identified only includes the ERF, not the Recycling Centre to the western part of the safeguarded site, which is permitted a throughput of 83,500tpa when the ERF is operational. This site is currently safeguarded in the adopted SLWP as Site 18.</p> <p>(b) Although intensification of existing sites is encouraged, extensions of existing sites should also be preferred over new separate sites. This ought to be the case especially if it means a more efficient landtake when compared with separate sites.</p> | <p>Noted. However, the Councils have reviewed the Beddington Farmlands Restoration Plan and noticed the current proposed safeguarded site includes some of the Wandle Valley Regional Park. Therefore, the Councils will be redrawing the safeguarded site boundary for the Submission draft to align with the extent of the Wandle Valley Regional Park.</p> <p>Noted. Extensions to existing sites may be considered. However, where an extension would affect a restrictive planning designation, such as Metropolitan Open Land, the extension would not be permitted.</p> |
| 189 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 190 | Resident MS of Sutton (C28) | Keeping existing sites with more recycling | Noted. |
| 191 | Resident OW of Sutton (C29) | Support draft policy. | Support welcomed. |
| 192 | Resident LP of | Do not support draft policy. Shut down the incinerator | Noted. |

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| | Sutton (C30) | | |
| 193 | Resident JA of Sutton (C31) | Support draft policy. | Support welcomed. |
| 194 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 195 | Resident K of Sutton (C33) | Support draft policy. | Support welcomed. |
| 196 | Resident ASW of Sutton (C34) | Do not support draft policy. | Noted. |
| 197 | Resident SB of Sutton (C35) | Do not support draft policy. | Noted. |
| 198 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |
| 199 | Resident TP of Sutton (C37) | Support draft policy. | Support welcomed. |
| 200 | Resident JM of Sutton (C38) | Support draft policy. | Support welcomed. |
| 201 | NHS England (C42) | Do not support draft policy. We disagree with Policy WP3 as we believe that the area needs additional facilities to dispose of hazardous clinical waste. | Noted. The Councils will be in contact regarding this matter. |
| 202 | Resident LF of Sutton (C43) | Do not support draft policy. | Noted. |
| 203 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 204 | Resident KA of Sutton (C45) | Existing sites should be operating for the boroughs waste. Extra bin collections should be factored in UNTIL shops sell foods with limited/no packaging. Bins are always overflowing- people want to recycle but have limited bin collections/missed | Noted. |

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| | | collections whilst BIG corporations have the monopoly of packaging! | |
| 205 | Resident A of Sutton (C47) | Do not support draft policy. | Noted. |
| 206 | Resident JH of Sutton (C48) | Support draft policy. Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Noted. The plan and its implications come at no cost to the Councils. |
| 207 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. | Noted. |
| 208 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 209 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |
| 210 | Resident AW of Sutton (C54) | This is not presented in plain English and far too much flicking back and forward need to be done and there are references to pages that one does not have access too unless you download and print out the whole document. | Noted. |
| 211 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 212 | Resident JK of Sutton (C56) | Do not support draft policy. | Noted. |
| 213 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 214 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 214 | Resident LW of Sutton (C61) | Don't understand this one | Noted. |

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| 215 | Resident MF of Sutton (C63) | More are required in Sutton | Noted. |
| 216 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 217 | Resident RD of Sutton (C66) | Support draft policy. | Support welcomed. |
| 218 | Resident Anonymous of Sutton (C67) | Do not support draft policy. | Noted. |
| 219 | Resident PML of Sutton (C68) | Support draft policy. | Support welcomed. |
| 220 | Essex County Council (C72) | <p>The concept of safeguarding waste sites is supported. However, the implementation of the policy will be greatly aided by prescribing a particular distance from a safeguarded facility within which this policy would apply. For example, Essex County Council have adopted a distance of 250m from the safeguarding facility, rising to 400m for Water Recycling Centres (Essex and Southend-on-Sea Waste Local Plan 2017, Policy 2).</p> <p>Detail should also be given with respect to the criteria that applicants proposing non-waste uses in proximity to a safeguarded site would need to address in order to demonstrate that the proposed non-waste development would not compromise an existing (or allocated) waste site. Reference could also be made to NPPF Paragraph 182 (the Agent of Change principle).</p> <p>Clauses c and d are not supported. Compensatory provision should be based on the methodology as set out in the London Plan, to which the South London Waste Plan should adhere. A policy stance of not permitting compensatory provision for the loss of a waste site outside the South London Waste Plan area is also not considered to be appropriate, if the applicant is able to demonstrate that there are no alternative sites elsewhere, and the proposal accords with the proximity principle and therefore sustainable development.</p> | <p>Disagree. There is insufficient industrial land for the Councils to draw zones around waste sites. Furthermore, the Agent of Change principle will deal with the issue of concern.</p> <p>The Councils are considering adding an Agent of Change policy.</p> <p>The Councils have a significant shortfall in industrial land supply compared to demand and so taking other boroughs' waste facilities is not feasible. In any event, the Councils' apportionment figures are already 13% greater than their arisings.</p> |

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| 221 | Resident A of Kingston (C73) | Don't know | Noted. |
| 222 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 223 | Resident D of Kingston (C76) | Support draft policy | Support welcomed. |
| 224 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |
| WP4 Sites for Compensatory Provision | | | |
| 225 | Environment Agency (C8) | <p>WP4 d) Transshipment hubs in the SLWP area such as Railheads should be safeguarded and inappropriate development in close proximity to them discouraged. Reference could also be made on this to the 'agents of change' policy in the new Draft London Plan.</p> <p>This is particularly important potentially for the delivery of major infrastructure projects and other major developments that may be delivered within the plan area.</p> | Noted. There are two railheads in the area: Purley (used by Days Aggregates) and Tolworth (also used by Days Aggregates). |
| 226 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | The policies set out for Compensatory Provision should be applied to decide whether to safeguard existing sites. | Noted. |
| 227 | Surrey County Council (C18) | We agree with Policy 4. | Support welcomed. |
| 228 | SUEZ (C20) | <p>In accordance with our comments relating to policy WP1, in order to ensure flexibility in the plan this policy should apply to new waste sites and not only those providing compensatory provision.</p> <p>Furthermore, we suggest that part (c) is amended in accordance with our comments in response to question WP3. The current wording singles out waste</p> | <p>Disagree.</p> <p>Disagree. There are concentrations of waste facilities in two particular areas of the South London Waste Plan area and the Councils consider the current wording is</p> |

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| | | <p>facilities as particularly negative even though modern developments are often not dissimilar to industrial operations. Cumulative impacts are relevant to most employment or industrial based development. Rewording as follows would provide the same effect for decision making:</p> <p>“Consider the advantages of the co-location of waste facilities while also taking account of cumulative impacts”</p> | unambiguous whereas the proposed wording is more open to interpretation. |
| 229 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 230 | Resident MS of Sutton (C28) | Do not support draft policy. | Noted. |
| 231 | Resident OW of Sutton (C29) | Support draft policy. | Support welcomed. |
| 232 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator. | Noted. |
| 233 | Resident JA of Sutton (C31) | Support draft policy. | Support welcomed. |
| 234 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 235 | Resident K of Sutton (C33) | Support draft policy. Again, written nicely but will it actually happen? | Noted. We expect so. |
| 236 | Resident ASW of Sutton (C34) | Do not support draft policy. | Noted. |
| 237 | Resident SB of Sutton (C35) | Do not support draft policy. | Noted. |
| 238 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |

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| 239 | Resident TP of Sutton (C37) | Support draft policy. | Support welcomed. |
| 240 | Resident JM of Sutton (C38) | Support draft policy. | Support welcomed. |
| 241 | NHS England (C42) | Do not support draft policy. We disagree with Policy WP4 as it does not include facilities for the disposal of hazardous clinical waste. | Noted. The Councils will be in contact regarding this matter. |
| 242 | Resident LF of Sutton (C43) | Do not support draft policy. | Noted. |
| 243 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 244 | Resident KA of Sutton (C45) | Do not support draft policy. Very non-specific points that can be easily manipulated by either council or approved contractors. | Noted. |
| 245 | Resident SM of Sutton (C46) | Support draft policy. | Support welcomed. |
| 246 | Resident A of Sutton (C47) | Do not support draft policy. | Noted. |
| 247 | Resident JH of Sutton (C48) | Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Noted. The plan and its implications come at no cost to the Councils. |
| 248 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. | Noted. |
| 249 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 250 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |

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| 251 | Resident AW of Sutton (C54) | Do not support draft policy. | Noted. |
| 252 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 254 | Resident JK of Sutton (C56) | Do not support draft policy. | Noted. |
| 254 | Resident JT of Sutton (C57) | Do not support draft policy. | Noted. |
| 255 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 256 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 257 | Resident LW of Sutton (C61) | Support draft policy. | Support welcomed. |
| 258 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 259 | Resident RD of Sutton (C66) | Do not support draft policy. | Noted. |
| 260 | Resident Anonymous of Sutton (C67) | Do not support draft policy. | Noted. |
| 261 | Resident PML of Sutton (C68) | Support draft policy. | Support welcomed. |
| 262 | Resident PMC of Sutton (C69) | Support draft policy. | Support welcomed. |
| 263 | Resident A of | Don't know | Noted. |

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| | Kingston (C73) | | |
| 264 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 265 | Resident C of Kingston (C75) | Support draft policy | Support welcomed. |
| 266 | Resident D of Kingston (C76) | Support draft policy | Support welcomed. |
| 267 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |
| WP5 Protecting and Enhancing Amenity | | | |
| 268 | Environment Agency (C8) | <p>(c) Particular regard will be paid to the impact of the development in terms of etc..."</p> <p>This could also reference to 'agents of change principle' in the Draft New London Plan.</p> <p>Policy D12 Agent of Change A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development.</p> <p>"3.12.3A The Agent of Change principle predominantly concerns the impacts of noise-generating uses and activities but other nuisances should be considered under this policy. Other nuisances include dust, odour, light and vibrations (see Policy SI1 Improving air quality and T7 Freight and servicing). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Policy E7 Industrial intensification, co-location and substitution, Part E 4). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development."</p> | Agree. The Councils will add an Agent of Change policy. |

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| 269 | Environment Agency (C8) | <p>10. The use of BREEAM is good but we would like to see an accredited standard applied for the construction phase of new waste facilities. The use of CEEQUAL would be good (CEEQUAL - The Civil Engineering Environmental Quality Assessment & Award Scheme) which is applied to cover the materials use, end of use phase and other elements related to the construction and design of a new facility.</p> <p>BREEAM we think only applies to the buildings that are inhabited such as the offices, visitors' centres, etc., and as there is no standard for waste facilities CEEQUAL is a good way of getting good environmental practice embedded in the project.</p> | Agree. The Councils will replace amend Policy WP6 to include CEEQUAL as well as BREEAM. |
| 270 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | The policies set out for Compensatory Provision should be applied to decide whether to safeguard existing sites. | Noted. |
| 271 | Surrey County Council (C18) | Surrey County Council fully supports Policy WP5, we feel waste development within the Green Belt can only be justified if the need cannot be met practically on land that lies outside of the Green Belt. | Support welcomed. |
| 272 | Veolia (C19) | <p>In the 2018 National Planning Policy Framework (NPPF) amendments included a more prominent recognition of the 'Agent of Change principle' which encapsulates the position that a person or business (i.e. the agent) introducing a new land use is responsible for managing the impact of that change. Veolia do not believe that the general level of coverage of this point in this document is sufficient. Although it is acknowledged within Key Issue 3 (page 15) that land, within London, is scarce, this is in the context of land available for waste uses versus the predicted requirement of land for new homes. There is no commentary or policy direction in respect of the impact of residential encroachment on existing waste uses.</p> <p>Encroachment by sensitive development, for example in the permitting of high rise residential development adjacent or close to waste facilities, has the potential to create issues for both ongoing operations and any future intensification on the existing waste site. While waste facilities will have their own environmental controls covering emissions, odour, dust and noise it is for new applicants bringing new</p> | Agree. The Councils will add an Agent of Change policy. |

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| | | <p>uses into the immediate area to establish and provide sufficient evidence there will be no significant issues arising post development (Agent of Change).</p> <p>We would like this to be acknowledged in the ongoing waste plan development and preferably more formally included by way of a direct policy or policy subtext. There is a proposed policy (WD5) which specifically covers Protecting and Enhancing Amenity and Veolia would suggest this is a suitable place to explain this point and preferably include as a sub point or point(s) within the policy itself. The Agent of Change principle could also be defined in the glossary.</p> | |
| 273 | SUEZ (C20) | <p>With regard to the accompanying text to policy WP5, the statement at paragraph 5.31 “waste facilities have the potential to generate a large number of amenity issues”, can apply to most forms of development. Equally, modern waste facilities have the potential to generate very few amenity issues which are significantly outweighed by the overall benefits. SUEZ encourage the adoption of a more balanced tone in this section.</p> <p>(1) In accordance with our comments relating to policies WP1 and WP4, in order to ensure flexibility in the plan part (a) of this policy should apply to new waste sites, and not only those providing compensatory or intensified provision.</p> <p>(2) Part (b) of the policy seeks to restrict all unloading, loading and storage to being within a fully enclosed covered building. In SUEZ experience, it may not be necessary or appropriate for this policy to be applied to all development. Most industrial facilities benefit from the use of operational yard space for storage and waste, recycling and resource management operations are no different in character. Many SUEZ facilities around the UK store either baled or loose recovered product externally in advance of transport to a re-processor. SUEZ suggest amending part (b) to state:</p> <p>“External unloading, loading or storage will only be permitted where the applicant can demonstrate that there are no significant amenity issues”</p> | <p>(1) Disagree.</p> <p>(2) Disagree. This requirement was introduced in the 2011 South London Waste Plan and has been tremendously successful, significantly reducing the amenity complaints from adjoining properties.</p> |
| 274 | Viridor (C22) | <p>(b) It will not always be appropriate to have activities such as loading within a fully enclosed building. Such matters ought to be addressed on a site by site basis, as there are a considerable number of variables; type of waste and hours of</p> | <p>Disagree. This requirement was introduced in the 2011 South London Waste Plan and has been tremendously successful,</p> |

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| | | operations to mention a few. | significantly reducing the amenity complaints from adjoining properties. |
| 275 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 276 | Resident MS of Sutton (C28) | Do not support draft policy. | Noted. |
| 277 | Resident OW of Sutton (C29) | Support draft policy. | Support welcomed. |
| 278 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator | Noted. |
| 279 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 280 | Resident ASW of Sutton (C34) | Support draft policy. | Support welcomed. |
| 281 | Resident SB of Sutton (C35) | Do not support draft policy. | Noted. |
| 282 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |
| 283 | Resident TP of Sutton (C37) | Support draft policy. | Support welcomed. |
| 284 | Resident JM of Sutton (C38) | Support draft policy. | Support welcomed. |
| 285 | Designing Out Crime Officer, Metropolitan Police (C40) | Safety and security should also be included | Agree. The Councils will add this element to the policy. |

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| 286 | NHS England (C42) | Do not support draft policy. We agree with Policy WP5 on principal, if this were to include the development of additional hazardous clinical waste disposal facilities. | Noted. The Councils will be in contact regarding this matter. |
| 287 | Resident LF of Sutton (C43) | Support draft policy. | Support welcomed. |
| 288 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 289 | Resident KA of Sutton (C45) | Do not support draft policy. I think as Sutton borough have already got that monstrosity and that we should NOT even be contemplating another!! That being said I think that as nothing can be done with the Beddington Lane incinerator - all efforts should be put into place to ensure that waste is recycled and deposited of correctly!!" | Noted. |
| 290 | Resident SM of Sutton (C46) | Support draft policy. | Support welcomed. |
| 291 | Resident A of Sutton (C47) | Support draft policy. | Support welcomed. |
| 292 | Resident JH of Sutton (C48) | Support draft policy. Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Noted. The plan and its implications come at no cost to the Councils. |
| 293 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. | |
| 294 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 295 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |
| 296 | Resident AW | Do not support draft policy. | Noted. |

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| | of Sutton (C54) | | |
| 297 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 298 | Resident JK of Sutton (C56) | Support draft policy. | Support welcomed. |
| 299 | Resident JT of Sutton (C57) | Do not support draft policy. | Noted. |
| 300 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 301 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 302 | Resident LW of Sutton (C61) | Support draft policy. | Support welcomed. |
| 303 | Resident MF of Sutton (C63) | More air monitors are required in the Hackbridge Area | Noted. Non-automatic air quality monitoring takes place at 57 London Road, Hackbridge and Hackbridge Primary School. See: https://drive.google.com/file/d/1bd_NFJAYCv3UPejSiJ124gHPiD5pdgSP/view |
| 304 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 305 | Resident RD of Sutton (C66) | Support draft policy. | Support welcomed. |
| 306 | Resident Anonymous of Sutton (C67) | Do not support draft policy. The fact that further development of waste on the Beddington site where harm has been seen to wildlife habitats as a result of recent waste buildings (ERF) should include not changing land usage from natural habitat to waste usage | Noted. By safeguarding existing waste sites only, the plan is protecting open space. |

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| 307 | Resident PML of Sutton (C68) | Support draft policy. | Support welcomed. |
| 308 | Resident PMC of Sutton (C69) | Support draft policy. | Support welcomed. |
| 309 | Essex County Council (C72) | It is considered that clause b of the policy, which states that 'The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building' is too prescriptive. The policy should allow sufficient flexibility such that the applicant is afforded the opportunity to demonstrate why this might not be necessary. | Disagree. A fully, enclosed covered building requirement was introduced in the 2011 South London Waste Plan. It has been proved successful in terms of take-up and led to a reduction in noise, dust and fugitive waste complaints of those living and working near to waste sites |
| 310 | Resident A of Kingston (C73) | Don't know | Noted. |
| 311 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 312 | Resident C of Kingston (C75) | Should be modified to reflect net gain in biodiversity and additional protection of rivers (such as Hogsmill River near Kingston sites). | The Councils consider there is sufficient protection in WP5 (c) (ii) |
| 313 | Resident D of Kingston (C76) | Support draft policy | Support welcomed. |
| 314 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |
| WP6 Sustainable Design and Construction of Waste Facilities | | | |
| 315 | Environment Agency (C8) | Cross reference CEEQUAL in paragraphs 5.37 and 5.38 Paragraph 5.39 Fugitive dust emissions are more likely possibly with climate change, also there is more likelihood of nuisance due to insects caused by higher temperatures/humidity, etc. | Agree. The Councils will replace references to BREEAM with references to CEEQUAL. Noted. Agree. The Councils will replace references |

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| | | <p>More severe weather events may also impact on waste management sites in close proximity to water courses or sites prone to pluvial flooding.</p> <p>Policy WP6 Agree but could be better, therefore CEEQUAL and bear in mind there aren't any standards for the design of waste facilities themselves, just the buildings that people inhabit such as offices and visitor's Centres Energy from Waste</p> | <p>to BREEAM with references to CEEQUAL.</p> <p>Noted.</p> |
| 316 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | Agree with policy, where possible | Noted. |
| 317 | Surrey County Council (C18) | We support Policy WP6. | Support welcomed. |
| 318 | SUEZ (C20) | <p>At paragraph 5.39, the accompanying text to policy WP6 makes reference to the 2008 document 'Designing Waste Facilities – A Guide to Modern Design in Waste'. It is worth noting that parts of this text are not necessarily applicable on a wholesale basis, for example, "external cladding materials should be high mass". In SUEZ' experience, this may apply where the regulation of temperature is appropriate to the waste facility (for example. AD or In-Vessel Composting) and also for office accommodation, but it is not necessarily applicable for WTS or MRF buildings that tend to be of typical industrial steel framed construction.</p> <p>SUEZ agrees with the sustainable construction of facilities and aims to develop at the highest quality in all circumstances. Part (a) of policy WP6 requires developments to achieve a sustainability rating of excellent under a bespoke BREEAM rating and we support this aspiration. However, we also support the inclusion of the wording that allows developers to demonstrate that this may be unfeasible in some circumstances.</p> <p>With regard to part (b) we express caution that "Waste facilities will be required to: ... incorporate green roofs... and other blue and green infrastructure measures". Incorporating a green roof is not always appropriate as many waste and recycling facilities require large, clear span buildings for vehicle and plant</p> | <p>Noted. However, as this is not part of the policy, 'Designing Waste Facilities – A Guide to Modern Design in Waste' is a guideline document only and, therefore, if the case can be made for not applying all the principles, then the Councils will accept the case.</p> <p>Noted. However, in response to the Environment Agency, it is proposed to replace BREEAM references with CEEQUAL references.</p> <p>Noted. The Councils are already aware of this and the phrase "as appropriate" is already included in the policy.</p> |

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| | | circulation and loading. The additional weight of the green roof requires additional steel support to the frame and increased foundations. A potential alternative could be to require new facilities to incorporate sustainable features in the infrastructure, for example (a minimum percentage of secondary/recycled materials in construction) or to include text noting that this may not be viable in all circumstances. | |
| 319 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 320 | Resident MS of Sutton (C28) | Fit sites with sprinklers to stop fires | Agreed. |
| 321 | Resident OW of Sutton (C29) | Support draft policy. | Support welcomed. |
| 322 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator | Noted. |
| 323 | Resident JA of Sutton (C31) | Support draft policy. | Support welcomed. |
| 324 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 325 | Resident K of Sutton (C33) | Do not support draft policy. | Noted. |
| 326 | Resident ASW of Sutton (C34) | Support draft policy. | Support welcomed. |
| 327 | Resident SB of Sutton (C35) | Do not support draft policy. | Noted. |
| 328 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |
| 329 | Resident JM of | Support draft policy. | Support welcomed. |

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| | Sutton (C38) | | |
| 330 | Designing Out Crime Officer, Metropolitan Police (C40) | Safety and security section of the Breeam should be included | Noted. However, in response to the Environment Agency, it is proposed to replace BREEAM references with CEEQUAL references. |
| 331 | NHS England (C42) | Do not support draft policy. We agree with Policy WP6 on principal, if this were to include the development of additional hazardous clinical waste disposal facilities. | Noted. The Councils will be in contact regarding this matter. |
| 332 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 333 | Resident KA of Sutton (C45) | Support draft policy. I agree with some of the points in that it should meet certain criteria however this borough should NOT be even attempting to look for another site. | Noted. |
| 334 | Resident SM of Sutton (C46) | Support draft policy. | Support welcomed. |
| 335 | Resident A of Sutton (C47) | Support draft policy. | Support welcomed. |
| 336 | Resident JH of Sutton (C48) | Support draft policy. Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Support welcomed. The plan and its implications come at no cost to the Councils. |
| 337 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. | Noted. |
| 338 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 339 | Resident of AM | Do not support draft policy. | Noted. |

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| | of Sutton (C52) | | |
| 340 | Resident AW of Sutton (C54) | Support draft policy. | Support welcomed. |
| 341 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 342 | Resident JK of Sutton (C56) | Support draft policy. | Support welcomed. |
| 343 | Resident JT of Sutton (C57) | Do not support draft policy. | Noted. |
| 344 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 345 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 346 | Resident LW of Sutton (C61) | Support draft policy. | Support welcomed. |
| 347 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 348 | Resident RD of Sutton (C66) | Support draft policy. | Support welcomed. |
| 349 | Resident Anonymous of Sutton (C67) | Do not support draft policy. Should not be allowed to build where natural wildlife habitat already exists as even plans to restore afterwards do not overcome the damage done to habitat as a result of new constructions | Noted. By safeguarding existing waste sites only, the plan is protecting open space. |
| 350 | Resident PML of Sutton (C68) | Support draft policy. | Support welcomed. |
| 352 | Resident PMC of Sutton (C69) | Support draft policy. | Support welcomed. |

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| 353 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 354 | Resident C of Kingston (C75) | Support draft policy | Support welcomed. |
| 355 | Resident D of Kingston (C76) | Support draft policy | Support welcomed. |
| 356 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |
| WP7 The Benefits of Waste | | | |
| 357 | Environment Agency (C8) | P38. 5.44 - This policy should be explained in more detail here or in an appendix - does this include all thermal treatment technologies, would Advanced Conversion Technologies (ACT) such as pyrolysis and gasification, would they also be excluded or not? | Noted. The Councils understand that The Mayor's statement refers to all thermal treatment technologies. |
| 358 | Environment Agency (C8) | WP7 - Should mention the utilisation of the heat generated by existing waste facilities such as Beddington Lane EfW, etc., | Noted. |
| 359 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | Agree with this policy | Support welcomed. |
| 360 | Surrey County Council (C18) | There is no mention of recycling within the policy but there is within the justification text, why is this? WP7 Point (b) of this policy should be worded more positively. We support the principle but the policy should set out the circumstances when new EfW facilities would be supported (i.e. including a demonstrable need that does not prevent the management of waste at the highest point practical in the waste hierarchy). | Disagree. There is mention of recycling, as a given, in the supporting text. Disagree. This is a statement of fact arising from a statement by The Mayor and is Objective 7.4 of the Mayor's Environmental Strategy |
| 361 | SUEZ (C20) | SUEZ supports this policy that recognises the benefits of waste developments, | Noted. |

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| | | however, part (a) could apply more broadly to waste development wherever a need has been identified. In addition, SUEZ would welcome consideration to moving this policy to earlier stages of the document in order to set the tone for positive impacts that the sector generates relative to sustainable development and climate objectives. | |
| 362 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 363 | Resident MS of Sutton (C28) | Support draft policy. | Support welcomed. |
| 365 | Resident OW of Sutton (C29) | Support draft policy. It's already too late as you've already built the incinerator. This is cynical positioning that you won't need more. | Noted. |
| 365 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator | Noted. |
| 366 | Resident JA of Sutton (C31) | Support draft policy. I agree in principle with the notion of locating new facilities near areas with above average unemployment, but fear it could translate to targeting poorer areas. | Noted. The Councils have considered this concern but decided, on balance, to include employment opportunities in the policy. |
| 367 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 368 | Resident K of Sutton (C33) | Support draft policy. | Support welcomed. |
| 369 | Resident ASW of Sutton (C34) | Support draft policy. | Support welcomed. |
| 370 | Resident SB of Sutton (C35) | Do not support draft policy. | Noted. |
| 371 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |
| 372 | Resident TP of | Support draft policy. | Support welcomed. |

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| | Sutton (C37) | | |
| 373 | Resident JM of Sutton (C38) | Support draft policy. | Support welcomed. |
| 374 | South London Nappies (C41) | Do not support draft policy. It seems ridiculous to talk about the benefits of waste, in terms of a disposable nappy which doesn't decompose for 450 years. Reusable nappies need to be promoted to reduce landfill. E.g. voucher scheme through Real Nappies for London | Noted. |
| 375 | NHS England (C42) | We have no comment to make on Policy WP7. | Noted. |
| 376 | Resident LF of Sutton (C43) | Do not support draft policy. | Noted. |
| 377 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 378 | Resident KA of Sutton (C45) | I agree in principle however technology needs to be improved before thinking of building another one! Not only are they currently unsightly but emissions, environmental issues are still an issue. Local Jobs are an issue and I think that they do offer assistance there including the power that comes from them! | Noted. |
| 379 | Resident SM of Sutton (C46) | Do not support draft policy. | Noted. |
| 380 | Resident A of Sutton (C47) | Support draft policy. | Support welcomed. |
| 381 | Resident JH of Sutton (C48) | Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Noted. The plan and its implications come at no cost to the Councils. |
| 382 | Sutton Independent Residents/Cllr Tim Foster (C50) | Do not support draft policy. | Noted. |

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| 383 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 384 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |
| 385 | Resident AW of Sutton (C54) | Do not support draft policy. | Noted. |
| 386 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 387 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 388 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 389 | Resident RB of Sutton (C60) | Support draft policy. | Support welcomed. |
| 390 | Resident LW of Sutton (C61) | Do not support draft policy. I think there should be work done into harnessing waste benefits as we will need it in the future. You are not going to prevent waste by much. | Noted. |
| 391 | Resident MR of Sutton (C65) | Do not support draft policy. | Noted. |
| 392 | Resident RD of Sutton (C66) | Support draft policy. | Support welcomed. |
| 393 | Resident Anonymous of Sutton (C67) | Do not support draft policy. Intensification of sites, specifically in the Beddington Lane area will result in additional traffic for which the narrow, already overused road cannot cope with , and increasing inhalation of traffic emissions to pedestrians and residents in the area | Noted. However, Sutton Council has a programme to improve the environment along Beddington Lane and this document is proposing no new waste management sites. |
| 394 | Resident PML | Support draft policy. | Support welcomed. |

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| | of Sutton (C68) | | |
| 395 | Resident PMC of Sutton (C69) | Support draft policy. | Support welcomed. |
| 396 | Essex County Council (C72) | Clause b of the policy, namely that 'Waste development for additional Energy from Waste facilities will not be supported' is considered to be too prescriptive and inflexible. It is noted that 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." There is however no guarantee that such targets will be met, and any Local Plan must be able to respond positively to changes in circumstances. NPPF Paragraph 11 is clear that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'. | Disagree. The Mayor has made a bold statement and this waste plan is merely supporting regional guidance. |
| 397 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 398 | Resident C of Kingston (C75) | Support draft policy | Support welcomed. |
| 399 | Resident D of Kingston (C76) | Support draft policy | Support welcomed. |
| WP8 Planning Obligations | | | |
| 400 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | Again these criteria should be used in safeguarding considerations | Noted. Please also see the Councils comments against Site C3. |
| 401 | Surrey County Council (C18) | We support Policy WP8. | Support welcomed. |
| 402 | SUEZ (C20) | SUEZ queries whether this policy is necessary as the need for planning obligations is identified through the development management process and not defined by the | Noted. |

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| | | <p>existence of a planning policy.</p> <p>Furthermore, the current wording is complex and difficult to interpret for a non-planning professional: "Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and offsite 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" could be simplified significantly with a similar outcome. For example, "planning obligations will be sought where these are necessary to make a development acceptable". If a similar policy is to be retained, SUEZ recommend that the text is plain and concise, noting that planning obligations will be sought where they are necessary to make a development acceptable.</p> | Disagree. The policy wording comes from the policy in the current South London Waste Plan, which came at the behest of the Planning Inspector in charge of the Examination-in-Public. |
| 403 | Resident PS of Sutton (C27) | Support draft policy. | Support welcomed. |
| 404 | Resident MS of Sutton (C28) | Do not support draft policy. Sutton council has a poor record here forcing all the trucks carrying waste to the Beddington INCINERATOR were forced to go through Croydon until Croydon residents complained about increased traffic | Noted. However, Sutton Council has a programme to improve the environment along Beddington Lane and this document is proposing no new waste management sites. |
| 405 | Resident OW of Sutton (C29) | Support draft policy. | Support welcomed. |
| 406 | Resident LP of Sutton (C30) | Do not support draft policy. Shut down the incinerator | Noted. |
| 407 | Resident JA of Sutton (C31) | Support draft policy. | Support welcomed. |
| 408 | Resident JS of Sutton (C32) | Do not support draft policy. | Noted. |
| 409 | Resident K of Sutton (C33) | Do not support draft policy. | Noted. |

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| 410 | Resident ASW of Sutton (C34) | Do not support draft policy. | Noted. |
| 411 | Resident SB of Sutton (C35) | Do not support draft policy. | Noted. |
| 412 | Resident A of Sutton (C36) | Do not support draft policy. | Noted. |
| 413 | Resident JM of Sutton (C38) | Support draft policy. | Support welcomed. |
| 414 | South London Nappies (C41) | Support draft policy. | Support welcomed. |
| 415 | NHS England (C42) | Support draft policy. We agree with Policy WP8 on principal, if this were to include the development of additional hazardous clinical waste disposal facilities. | Noted. The Councils will be in contact regarding this matter. |
| 416 | Resident LF of Sutton (C43) | Support draft policy. | Support welcomed. |
| 417 | Resident JK of Sutton (C44) | Support draft policy. | Support welcomed. |
| 418 | Resident KA of Sutton (C45) | Support draft policy. Sutton borough already has an incinerator so it should be put into a clause that we DO NOT have any more!!! | Noted. |
| 419 | Resident SM of Sutton (C46) | Do not support draft policy. | Noted. |
| 420 | Resident A of Sutton (C47) | Support draft policy. | Support welcomed. |
| 421 | Resident JH of Sutton (C48) | Support draft policy. Depends at what cost to the residents and businesses? Veolia own the contract and they should be footing the bill. | Noted. The plan and its implications come at no cost to the Councils |
| 422 | Sutton Independent | Do not support draft policy. | Noted. |

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| | Residents/Cllr Tim Foster (C50) | | |
| 424 | Resident S of Sutton (C51) | Do not support draft policy. | Noted. |
| 425 | Resident of AM of Sutton (C52) | Do not support draft policy. | Noted. |
| 426 | Resident AW of Sutton (C54) | Do not support draft policy. | Noted. |
| 427 | Resident AS of Sutton (C55) | Support draft policy. | Support welcomed. |
| 428 | Resident JK of Sutton (C56) | Do not support draft policy. | Noted. |
| 429 | Resident JT of Sutton (C57) | Do not support draft policy. | Noted. |
| 430 | Resident RS of Sutton (C58) | Support draft policy. | Support welcomed. |
| 431 | Resident CC of Sutton (C59) | Support draft policy. | Support welcomed. |
| 432 | Resident LW of Sutton (C61) | Support draft policy. | Support welcomed. |
| 433 | Resident RD of Sutton (C66) | Support draft policy. | Support welcomed. |
| 434 | Resident Anonymous of Sutton (C67) | Do not support draft policy. Under previous plans residents of Beddington were promised that waste vehicles would not use parts of Beddington Lane, however, this promise has not been kept and in addition no cameras have been placed to ensure vehicles do keep to speed limits etc | LB Sutton carried out the Statutory Consultation in March 2019 about the proposed Traffic Management Order PR 1063 – the Beddington Village Heavy |

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| | | | Goods Vehicle (HGVs) restriction extension. Given the level of interest and the sensitive nature of the proposals, LB Sutton has now taken the decision to defer the rollout of these proposed restrictions for a few months. This will allow LB Sutton to address questions and concerns raised, do further engagement with affected businesses, and undertake additional monitoring to ensure the evidence base for the scheme is robust, as well as allow the completion of various other roadworks in the area which are impacting the network |
| 435 | Resident PML of Sutton (C68) | Support draft policy. | Support welcomed. |
| 436 | Resident B of Kingston (C74) | Do not support draft policy | Noted. |
| 437 | Resident C of Kingston (C75) | Support draft policy | Support welcomed. |
| 438 | Resident D of Kingston (C76) | Support draft policy | Support welcomed. |
| 439 | Resident E of Kingston (C77) | Support draft policy | Support welcomed. |
| Croydon Sites – General Comments | | | |
| 440 | Historic England (C21) | - For Croydon sites: The APA reference should be amended to reflect the borough APA review that means all areas of the borough is now assigned to Tier I to Tier IV: see https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/ | Agree. The Councils will amend the references to APAs in this part of the document. |

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| 441 | Resident LP of Sutton (C30) | Shut down the incinerator | Noted. |
| 442 | Resident KA of Sutton (C45) | I DO NOT believe that any site should be expanded. If this effort was put into retail shops with their packaging we would NOT need additional waste depots as people would be able to recycle more and more. | Noted. However, the Councils are required to meet their GLA targets. |
| 443 | Resident JH of Sutton (C48) | How much is this all going to cost? Will this be another failure from Sutton Council like the one in hiring Veolia? | Noted. The plan and its implications come at no cost to the Councils |
| 444 | Resident LW of Sutton (C61) | I don't understand this part | Noted. |
| 445 | Resident Anonymous of Sutton (C67) | As a resident in Beddington I am concerned about both the environmental impact on the area and the increase of traffic along Beddington Lane. Beddington Lane is already a concern for me as a regular pedestrian who has had several near misses at the zebra crossing by the BP Garage and often have to walk alongside stationary or slow moving congested traffic. | Noted. However, Sutton Council has a programme to improve the environment along Beddington Lane and this document is proposing no new waste management sites. |
| C1: Able Waste Services, 42 Imperial Way, Croydon. CR0 4RR | | | |
| 446 | Historic England (C21) | The Grade II* listed Airport House lies opposite this site. Airport House is significant for many reasons including architectural interest as an early example of a purpose built airport with incorporated control tower, and for its group value with surrounding unlisted buildings. Although this site is not recommended for intensification it is important to note that future development of this site could potentially impact upon the setting of this important building, and so this must be considered from the outset. In case the situation changes, we suggest that the presence of Airport House in close proximity to the site is referenced in the planning designation and issues to consider sections of the schedule. | Agree. The Councils will include a reference to Airport House within the 'Issues to Consider' section. |
| 447 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 448 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |

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| 449 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 450 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 451 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 452 | Resident JH of Sutton (C48) | This site should be safeguarded | Support welcomed. |
| 453 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 454 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 455 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 456 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 457 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 458 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 459 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 460 | Resident E of Kingston | The site should be safeguarded | Support welcomed |

C2: Croydon Car Spares, 111 Aurelia Road, Croydon. CRO 3BF

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| 461 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 462 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 463 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 464 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 465 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 466 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 467 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 468 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 469 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 470 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 471 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |

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| 472 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| 473 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| C3: Curley Skip Hire, Rear of 64 Northwood Road, Croydon. CR7 8HQ | | | |
| 474 | Group Director of Curley Skip Hire & Waste Recycling Ltd (C12) | <p>Object to safeguarding.</p> <p>Curley Skip Hire is the only small waste transfer station on the list. (Croydon car spares and New Era are metal recycling only and the latter operate in conjunction with Able Waste adjacent).</p> <p>It has a licenced capacity of 10,920 tonnes which is only 1.5% of the whole borough of 719,000 tonnes pa.</p> <p>The site is described as having double and triple height inter war sheds but as the plan indicates, the volume of buildings on the site is very small. It is clear that there is no room for intensification or expansion of the existing use. It is stated that the operation should take place within a fully enclosed building but there is no realistic space for this, and such a building would be visually intrusive to neighbouring residential properties.</p> <p>As the plan indicates it is virtually surrounded by existing or proposed residential buildings. There are 6 houses abutting the site on Northwood Road, a new scheme of 10 houses and 21 flats fronting Osborne Road and a new allocation of community/residential for Audrey House adjacent. There is also residential development activity at 70, 72-76 and 78-88 Bensham Grove.</p> <p>It is also relevant that the only access to the site is along a drive shared with Audrey House.</p> <p>Over the years many complaints have been made by residential neighbours about noise, dust, vibration and vehicle movements.</p> | <p>Agree. Given the surrounding existing and proposed residential uses and the fact that the site does not contribute to any throughput totals, it is proposed to delete this site from the next plan.</p> |

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| 475 | Resident PS of Sutton (C27) | This site should be safeguarded | Noted. |
| 476 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 477 | Resident JS of Sutton (C32) | This site should be safeguarded | Noted. |
| 478 | Resident K of Sutton (C33) | This site should be safeguarded | Noted. |
| 479 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 480 | Resident A of Sutton (C36) | This site should be safeguarded | Noted. |
| 481 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Noted. |
| 482 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 483 | Resident LS of Sutton (C53) | This site should be safeguarded | Noted. |
| 484 | Resident AS of Sutton (C55) | This site should be safeguarded | Noted. |
| 485 | Resident JK of Sutton (C56) | This site should be safeguarded | Noted. |
| 486 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |

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| 487 | Resident CC of Sutton (C59) | This site should be safeguarded | Noted. |
| 488 | Resident E of Kingston | The site should be safeguarded | Noted |
| C4: Days Aggregates Purley Depot, Approach Road, Croydon. CR8 2AL | | | |
| 489 | Resident PS of Sutton (C27) | This site should be safeguarded | Noted. |
| 490 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 491 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 492 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 493 | Resident SB of Sutton (C35) | This site should be safeguarded | Support welcomed. |
| 494 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 495 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 496 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 497 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |

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| 498 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 499 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 500 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 501 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 502 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| 503 | Days Aggregates Ltd (C78) | <p>1. Introduction</p> <p>We are instructed by our client, Day Group Ltd, to provide the following response in respect of the South London Waste Plan Issue and Preferred Options consultation.</p> <p>Day Group are the operators of the Purley Rail Depot, accessed from Approach Road and located adjacent to and south of Purley Station. The site is identified as C4 within the consultation document.</p> <p>(1) From the rail depot Day Group operate their rail served aggregates business which includes supply of an onsite concrete batching plant (CBP) and operate a construction and demolition (C&D) waste recycling facility. These types of rail served sites comprise a scarce resource which are particularly difficult to replace. Indeed, the importance of safeguarding of rail served minerals sites is underpinned by policy requirements both at national level and within the existing and emerging London Plan as detailed below. This policy context, together with a full appreciation of how the depot functions and the role these type of facilities play in assisting with the sustainable supply of building materials, is critical to understanding the basis for the comments made to the South London Waste Plan Consultation and, in summary, to ensure that the identification of the site as 'safeguarded for waste' does not prejudice the future operation of the rail depot and its mineral function.</p> | <p>(1) The Councils have no intention to prejudicing Days Aggregates minerals operations and will ensure that the waste safeguarding does not hamper that side of the operation.</p> <p>(2) Noted. The Councils note Days Aggregates' plans for expansion.</p> <p>(3) Noted. The Councils intend to introduce their own Agent of Change element to Policy WP5.</p> <p>(4) Supported. The Councils welcome the correction to the throughput figure.</p> <p>(5) Noted. The Councils will correct the headings to Table 16.</p> <p>(6) Noted. The Councils will amend the site allocation text to provide flexibility of operation for Days Aggregates within their</p> |

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| | <p>2. Purley Goods Yard</p> <p>Day Group has operated the rail served aggregates depot at Purley since the 1990's and it has been an active goods yard for much longer. This long-established facility comprises a highly sustainable source of supply to the construction industry. The Goods Yard currently accommodates around 250 train loads of construction aggregates each year. The ability to supply essential materials such as this by train keeps in the region of 30,000 long distance lorry trips (that would cover c.2 million road miles and generate 2,400 tonnes of CO2 each year) off the road network. This makes a significant contribution to reducing road congestion, CO2, particulates and nitrogen oxides emissions, as well as reducing road-risks. All of which is consistent with both Croydon's and the Mayor of London's policies on transport, growth and air quality.</p> <p>These sustainably supplied construction materials are vital to supporting existing and planned redevelopment within and close to Croydon as well as other nearby infrastructure maintenance and improvements.</p> <p>Specifically, the Goods Yard is operated as follows:</p> <ul style="list-style-type: none"> • Aggregate brought in by rail is discharged from 'hopper' wagons into a covered below-ground receiving facility and then conveyed into on-site storage areas before being loaded onto HGVs as required for redistribution by road. This facility operates under permitted development rights accruing to rail sites and as such there are no restrictions on operating hours. • The long-established concrete batching plant on site uses rail supplied aggregates in its production of ready-mixed concrete. • The enclosed on-site recycling plant handles c.150,000 tonnes p.a. of locally sourced construction & demolition waste to provide aggregates for local construction projects, thereby removing the need for additional extraction and importation of primary aggregates, with all the associated environmental benefits. • (2) There is also potential for the expansion of activities and uses on the site which, as indicated below, is supported by policy. <p>Day Group, as an experienced rail depot operator, is clear that rail served sites such as the Purley Rail Depot are a scarce resource and not easily replaced. This is because of the costs involved in creating new railhead facilities and the</p> | site. |
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| | | <p>difficulties in securing land where appropriate access to the rail and road network can be achieved. The importance of such sites is underpinned by the protective policies found in the NPPF and London Plan.</p> <p>3. Relevant Policy Context</p> <p>Critical to the consideration of ‘soundness’ of the South London Waste Plan and how the Purley Depot Site (C4) is approached are the relevant National and London Plan policy requirements. The draft plan is clear in setting out the waste policy background and Day Group recognise that the Councils must respond to the forthcoming London Plan target of reuse/recycling/recovery of 95% of construction and demolition waste.</p> <p>However, in the case of the Purley Depot site it is also important to recognise the sites minerals function as an aggregate rail depot, which is supported by the NPPF and London Plan as follows:</p> <p>i) NPPF The National Planning Policy Framework (NPPF) (2019), in the context of Facilitating the Sustainable Use of Minerals, requires at Para 204(e) that: “Planning policies should e) Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products...”</p> <p>ii) London Plan The London Plan Review is now at a very advanced stage and the final version of the new Plan is expected to be published in February/March 2020. The key Draft London Plan policies are detailed as follows: Draft Policy S110, ‘Aggregates’, maintains the requirement in the context of plan making that development plans should: ‘ensure sufficient capacity of aggregates wharves and aggregate rail depots is available to ensure a steady and adequate supply of imported and marine aggregate to London and maximise the movement of aggregates by sustainable modes’.</p> <p>The draft policy goes on to confirm that Council’s Development Plans should: ‘identify and safeguard sites and facilities, including wharves and railheads, with</p> | |
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existing, planned or potential capacity for transportation, distribution, processing and /or production of primary and/or secondary/recycled aggregates.'

(3) The draft policy also requires that:
'development proposals should be designed to avoid and mitigate potential conflicts with sites safeguarded for the transportation, distribution, processing and/or production of aggregates, in line with the Agent of Change principle.'

Draft supporting paragraph 9.10.5 acknowledges the importance of railway depots for importing crushed rock from other parts of the UK. It concludes that railheads are vital to the sustainable movement of aggregates and boroughs should safeguard them.

Draft Policy T7, 'Deliveries, Servicing and Construction' has been amended in response to the Panel's recommendation and the 'Intent to Publish' version includes an additional sentence stating that 'development plans and development proposals should facilitate sustainable freight movement by rail, waterway and road'. Draft Policy T7 also places a further requirement on local authorities to safeguard railheads in plan-making.

iii) Adopted Croydon Local Plan (2018)
It is noted that the existence of the Purley Depot is referenced within the Adopted Local Plan - at para 10.24 "the sidings at Purley, currently occupied by an aggregates company, is an active rail freight site" and at para 11.161 "Realisation of the potential of the Warren Road railhead to transfer freight to rail will be supported".

4. Response to Issues and Preferred Options Consultation

i) WP2 – Strategic Approach to Other Forms of Waste

Capacity for construction and demolition waste is notoriously difficult to measure as much takes place on construction sites or at waste management facilities with exemptions from Environment Agency permits. This is why it is not included within the London Plan apportionment figures (Paragraph 9.8.13 of the London Plan intend to adopt version). Nevertheless, the draft South London Waste Plan does seek to measure it in Figure 16. This table presents the maximum throughput figures, the licence figures and the 'throughput counting towards apportionment'

figures. Figure 15 makes it clear that it is the 'throughput counting towards apportionment' column which is used to measure capacity.

Paragraph 5.14 confirms that the throughput of 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'.

For the Day Aggregates Site (C4), Day Group agree with the maximum throughput and licence figure for their site. However, they query why 0 of this is counted towards apportionment. At the Purley Site construction and demolition waste is brought in from local sites by road, processed by the construction and demolition waste recycling plant to produce recycled aggregate which is then exported directly to local construction sites for use in construction, predominantly as sub-base materials for roads. It should therefore not be considered as a 'waste transfer operation' but as a construction and demolition waste processing site. The only material which is transferred for further recycling is a small quantity of metal waste. Overall, 99.6% of the construction and demolition waste that is brought to site is recycled into aggregate on site.

(4) It is therefore put forward that the correct figure for the final column for the Day Aggregates site (C4) is in the order of 178,593 tonnes (99.6% of 179,300).

If the processing of construction and demolition waste is better understood on the sites identified in Figure 16 then there may be no shortfall. A more detailed understanding of the sites is needed to ensure that the plan is robust and can be found sound.

(5) In addition, we note that the use of the word 'apportionment' for the final column of Figure 16 could be confusing for readers given that this is unrelated to the London plan apportionment figures. It may be better to use the term 'qualifying throughput' (as used in the site descriptions) or similar to differentiate this from the London Plan apportionment figures.

The usefulness of the licence column in Figure 16 is also queried given the large licencing bands used for standard rules permits as detailed at Paragraph 5.2.3.2 of

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| | <p>the South London Waste Technical Paper. The sentence at 5.16 stating ‘The shortfall for Construction and Demolition waste management could also be eradicated if some facilities processed waste at volumes close to their licensed capacities’ is therefore considered to be unsound as it is not reasonable to expect this to happen.</p> <p>In relation to the draft text for Policy WP2 Day Group have no specific comments.</p> <p><u>ii) WP3 – The Safeguarding of Existing Waste Sites</u> Draft Policy WP3 (a) states that ‘The sites set out on Pages 42 – 90 of the South London Waste Plan will be safeguarded for waste use only.’ This policy is problematic for sites such as Day Aggregates (C4) whose site also represents an important rail depot site for minerals use as set out in the background section above.</p> <p>We have recently made representations to the Croydon Local Plan Review seeking for the site to be properly identified as a ‘Safeguarded Rail Site’. We consider that the safeguarding of the site for rail use is in accordance with the NPPF and London Plan and is necessary to make the plan sound.</p> <p>We would favour a more flexible approach to either safeguard the capacity or floorspace of the site for waste use, as opposed to the whole area within the red line or to allow an exception for Day Aggregates site to state something along the lines of: “The sites set out on Pages 42 – 90 of the South London Waste Plan will be safeguarded for waste use only unless they are also designated for another complementary use within a local plan, such as the safeguarded rail site at Purley Depot. In this case the capacity of the site for waste use must be safeguarded in any proposals for the complementary use.”</p> <p>An alternative would be to draw the red line around the construction and demolition waste plant part of the site and just to safeguard this part, however we do not consider that this provides sufficient flexibility for Day Group to ensure the continued efficient use of the limited space available and therefore is not supported.</p> <p><u>iii) C4 – Days Aggregates Purley Depot, Approach Road, Croydon</u></p> | |
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| | | <p>Day Group do not object to their site being safeguarded for waste uses provided that the minerals function of the site is also recognised and allowed to intensify in principle should this be put forward in the future.</p> <p>(6) The site description should be amended to include reference to the railway sidings which make this an important minerals site.</p> <p>We suggest the following site description wording: “Rail depot including railway sidings, aggregate storing, construction & demolition waste recycling plant, concrete batching plant, ancillary office building and enclosed sheds. The site lies adjacent to Purley rail station and is reasonably isolated from nearby residential properties”</p> <p>We have no objection to the rest of the information on page 45, indeed the railhead is acknowledged in the ‘opportunity to increase waste managed’ subsection. It is the wording of Policy WP3 which is critical to ensure that Day Aggregates are not prevented from intensifying the minerals use of the site in the future because of the site being safeguarded for waste.</p> <p>It is confirmed that we would be very happy to meet to review the comments made on the South London Waste Plan and would be happy to show you around the construction and demolition waste recycling plant if you consider it useful. In the meantime, I would be grateful if you could confirm receipt of these representations and confirmation that they have been duly made.</p> | |
| C5: Factory Lane Waste Transfer Station, Factory Lane, Croydon. CR0 3RL | | | |
| 504 | Veolia (C19) | This is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 505 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 506 | Resident LP of | This site should not be safeguarded | Noted. |

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| | Sutton (C30) | | |
| 507 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 508 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 509 | Resident SB of Sutton (C35) | This site should be safeguarded | Support welcomed. |
| 510 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 511 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should not be safeguarded | Noted. |
| 512 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 513 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 514 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 515 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 516 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 517 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |

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| 518 | Resident RD of Sutton (C66) | This site should not be safeguarded | Noted. |
| 519 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| C6: Fishers Farm Civic Amenity Site, North Downs Road, Croydon. CR0 OLF | | | |
| 520 | Veolia (C19) | This is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 521 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 522 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 523 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 524 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 525 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 526 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 527 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |

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| 528 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 529 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 530 | Resident JK of Sutton (C56) | This site should be safeguarded | Noted. |
| 531 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| C7: Henry Woods Waste Management, Land adjacent to Unit 9, Mill Lane Trading Estate, Croydon. CR0 4AA | | | |
| 532 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 533 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 534 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 535 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 536 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 537 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 538 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |

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| 539 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 540 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 541 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 542 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 543 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| C8: New Era Metals, 53 Imperial Way. Croydon. CR0 4RR | | | |
| 544 | Historic England (C21) | The Grade II* listed Airport House lies opposite this site. Airport House is significant for many reasons including architectural interest as an early example of a purpose built airport with incorporated control tower, and for its group value with surrounding unlisted buildings. Although this site is not recommended for intensification it is important to note that future development of this site could potentially impact upon the setting of this important building, and so this must be considered from the outset. In case the situation changes, we suggest that the presence of Airport House in close proximity to the site is referenced in the planning designation and issues to consider sections of the schedule. | Agree. The Councils will include a reference to Airport House within the 'Issues to Consider' section. |
| 545 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 546 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 547 | Resident K of Sutton (C33) | This site should not be safeguarded | Noted. |
| 548 | Resident SB of | This site should not be safeguarded | Noted. |

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| | Sutton (C35) | | |
| 549 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 550 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 551 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 552 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 553 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 554 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 555 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 556 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 557 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| 558 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| C9: Pear Tree Farm, Featherbed Lane, Croydon. CR0 9AA | | | |

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| 559 | Surrey County Council (C18) | Pear Tree Farm site lies on the Tandridge border, just north of the hamlet of Fickleshole. We would agree that this site is not suitable for the intensification of the existing waste use due to the unsuitability of the network of lane immediately to the south of the site and that the site lies within the Green Belt. However, as this site is an established waste use we have no objections with safeguarding this site. | Noted. |
| 560 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 561 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 562 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 563 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 564 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 565 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 566 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 567 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 568 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 569 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |

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| 570 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 571 | Resident E of Kingston | The site should be safeguarded | Support welcomed |
| C10: Purley Oaks Civic Amenity Site, Brighton Road, Croydon. CR8 2BG | | | |
| 572 | Veolia (C19) | This is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 573 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 574 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 575 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 576 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 577 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 578 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 579 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |

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| 580 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 581 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 582 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 583 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| C11: SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon. CR5 2HT | | | |
| 584 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 585 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 586 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 587 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 588 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 589 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 590 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |

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| 591 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 592 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 593 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| C12: Stubbs Mead Depot, Factory Lane, Croydon. CR0 3RL | | | |
| 594 | Veolia (C19) | This a site which Veolia uses as part of the South London Waste Partnership Collection and Streets contract. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 595 | Historic England (C21) | - p.53: Stubbs Mead Depot. Site is not identified as being in a Croydon APA (see above comment re APA review), regardless, as site is over 0.5ha at over 2ha, it will need to be archaeological consideration. See https://historicengland.org.uk/images-books/publications/charter-for-greater-london-archaeological-advisory-service/ | Agree. The Councils will amend the references to the site. |
| 596 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 597 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 598 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 599 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 600 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |

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| 601 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 602 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 603 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 604 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 605 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 606 | Resident JT of Sutton (C57) | This site should not be safeguarded | Noted. |
| 607 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| Kingston Sites – General Comments | | | |
| 608 | Resident LP of Sutton (C30) | Shut down the incinerator | Noted. |
| 609 | Resident JH of Sutton (C48) | How much is this all going to cost? | Noted. The plan and its implications come at no cost to the Councils |
| 610 | Resident LW of Sutton (C61) | I don't understand this part. | Noted. |
| K1: Chessington Equestrian Centre, Clayton Road, Kingston. KT9 1NN | | | |

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| 611 | Poppymill Ltd (C13) | <p>These representations have been submitted on behalf of Poppymill Limited (“Poppymill”) in response to consultation on the Issues and Preferred Options South London Waste Plan (“SLWP”).</p> <p>Poppymill controls a 21-hectare site off the A3 Esher Bypass (“Land at Hook”) (Figure 1), within which is located potential waste site K1 (“Site K1”) (Figure 2). Both sites are located in the Royal Borough of Kingston-upon-Thames (“RBKT”).</p> <p>Poppymill is actively promoting the Land at Hook for a major residential-led mixed use development through RBKT’s emerging Local Plan.</p> <p>The SLWP states that Site K1 is for the deposit of excavation waste to land as a recovery operation. It further states that Site K1 is not safeguarded for waste uses and there is no opportunity to increase waste managed at the site “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.”</p> <p>It is clear from the site’s planning history that permission was granted in October 2013 for the “Creation of a new manège area, new drainage & water abatement features & new woodland, grassland and hedgerow habitats” (LPA ref. 13/10228/FUL).</p> <p>The planning permission allowed for the importation of 100,000 tonnes of inert material to regrade the land in order to address surface water flooding issues and support equestrian activities. This was imported under an Environment Agency (“EA”) permit granted in December 2013 (ref. EPR/AV3807FC).</p> <p>The three pre-commencement conditions for planning permission 13/10228/FUL (7, 11 and 15) were subsequently discharged in August 2014 under application 14/10126/COND; and it is Poppymill’s understanding that the importation of the waste material was completed in line with the approximate timeline set out in the Committee Report, which notes an importation process of between 12-18 months.</p> <p>In conclusion, Site K1 had a permit to accept inert waste material linked to a planning permission to regrade the land for drainage and equestrian purposes</p> | <p>Agree. As this site is a temporary site and does not contribute to the existing waste management totals. It is proposed to delete this site from the South London Waste Plan.</p> |
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| | | <p>which has since been completed. Site K1 is not therefore a permanent waste site and there are no opportunities to intensify waste uses.</p> <p>The land's promotion for a major residential-led mixed use development should be prioritised within RBKT's emerging Local Plan and Site K1 should not be included as a safeguarded waste site in the forthcoming SLWP.</p> | |
| 612 | Elmbridge Borough Council (C14) | <p>Thank you for consulting Elmbridge Borough Council on the South London Waste Plan Issues and Preferred Options Consultation on behalf of the London Boroughs of Croydon, Kingston, Merton and Sutton. As a neighbouring borough, the Council is particularly interested in those cross-boundary strategic planning issues that could have implications for the Borough and its residents and, for its own Local Plan preparation.</p> <p>Having reviewed the documents produced by the partner-authorities, the Council confirms its support for the objectives of the four authorities working towards becoming net self-sufficient in terms of waste generation and management for all types of waste and, for the four authority areas playing their part in managing London's Household and Commercial and Industrial Waste within the capital's boundary.</p> <p>The Council cannot, however, support the overall vision for the Plan and draft Policy WP3 Existing Waste Sites as, it strongly objects to the proposal of Chessington Equestrian Centre, Clayton Road, Kingston, KT9 1NN (K1) being safeguarded for waste uses. The Council objects to the proposal on the following grounds</p> <p>Status of the site The vision and objectives for the Plan (Section 4) and draft Policy WP3 state that existing waste sites will be safeguarded to meet the Draft London Plan target for Household, Commercial and Industrial Waste and the identified needs for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.</p> <p>Whilst the Council supports the approach of safeguarding existing sites, the Council has serious doubts as to the status of Chessington Equestrian Centre as</p> | <p>Agree. As this site is a temporary site and does not contribute to the existing waste management totals, it is proposed to delete this site from the South London Waste Plan.</p> |

an **existing waste site**. Regarding the site, details of planning application 13/10228 (granted 25 October 2013) (the application number provided to the Council on enquiry to the four authorities) and the Environment Agency Permit (EPR/AB3807FC) show that the importing of inert waste related to a specific project. Namely permission was granted to import *...up to 100,000 tonnes of inert waste to carry out the construction of a ménage area and associated landscaping, land drainage, and water abatement features...* Furthermore, Clause 2.3.3 of the Permit makes clear that *"no waste shall be accepted for **disposal at the site**"* (Council's emphasis).

Thus, neither the planning application nor the Permit were intended to provide a waste facility at this site. To an extent, this appears to be confirmed in the pro-forma (page 55 of the Consultation document) which states that the site is not currently safeguarded, is not a permanent waste site and there are no opportunities for intensifying uses. However, the pro forma then contradicts itself by setting out criteria to be considered by developers if they wish to intensify the safeguarded site.

Within the Consultation document, there is a lack of consistency regarding the current status of the site and its future opportunities for intensification. The Council's position is however clear, it is not an existing waste site and should not feature in the Plan as a safeguarded site with opportunities for intensification,

Green Belt

Chessington Equestrian Centre is located within the Metropolitan Green Belt and within Kingston's Green Belt and Metropolitan Open Land Assessment (2018) the area in which the site is located, is identified as contributing to both in terms of their purposes.

As stated above, the Council does not believe that the Centre is an existing waste site. Therefore, the partner authorities would need to consider how it would be brought forward through the Local Plan and a subsequent planning application. If the partner authorities were minded to allocate the site, consideration of exceptional circumstances in accordance with paragraph 136 of the National Planning Policy Framework (NPPF, 2019) would be required at both a strategic and site-specific level. Exceptional circumstances are not mentioned in the

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| | <p>Consultation document.</p> <p>In terms of a planning application, it is unlikely that the development of the site as a waste facility (particularly one which would be enclosed to allow intensification), would be appropriate development in the Green Belt in accordance with paragraphs 143 – 145 of the NPPF. Neither is it considered likely that development would be permitted under paragraph 146, in that such development is unlikely to preserve the openness of the Green Belt and not conflict with the purposes of including land within it. From the Consultation document and supporting information it is unclear as to what very special circumstances would exist for planning permission to be given to the site.</p> <p>Access and highways</p> <p>The Council has serious concerns as to the suitability of the Local Road Network (LRN) to accommodate the movements of Heavy Goods Vehicles (HGVs) going to and from the site.</p> <p>The site can be accessed via the A3, A309 (Kingston-by-Pass) and Woodstock Lane South, thereby avoiding the LRN. However, exiting the site is more difficult with vehicles only able to leave the site via Claygate due to width restrictions at Clayton Road and not being able to access the A309 from Woodstock Lane South. Furthermore, the bridge from the A309 over the A3 to the proposed site, was not designed to accommodate regular HGV movements and has been damaged by recent collisions.</p> <p>The proposed safeguarding of the site is therefore not considered to be consistent with paragraph 108 of the NPPF (safe and suitable access to the site) or Appendix B Locational Criteria of the National Planning Policy for Waste (2014) which states that consideration will include the suitability of the road network and the extent to which access would require reliance on local roads.</p> <p>Insufficient information</p> <p>The Council considers that further information is required to justify the 'safeguarding' of the site and for the Council to make an informed and meaningful assessment of the potential impacts on neighbouring residents regarding issues of</p> | |
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| | | <p>noise, odour and dust. This is particularly pertinent given that the site is adjacent to several Gypsy and Traveller sites / pitches whose accommodation makes them more susceptible to the negative effects of these pollutants.</p> <p>Conclusions Whilst the Council welcomes the objective of the four authorities working towards becoming net self-sufficient, it cannot support the overall vision for the Plan and draft Policy WP3 Existing Waste Sites.</p> <p>The Council strongly objects to the proposal of Chessington Equestrian Centre, Clayton Road, Kingston, KT9 1NN (K1) being safeguarded for waste uses and would welcome clarification as to its status in advance of the next iteration of the Plan.</p> | |
| 613 | Claygate Parish Council (C15) | <p>Existing Permit at Chessington Equestrian Centre (appended)</p> <p>1. The existing site at Chessington Equestrian Centre has a Permit for inert waste, but this was granted in 2014 for a specific project. In particular, the Permit was for the use of “up to 100,000 tonnes of inert waste to carry out the construction of a ménage area and associated landscaping, land drainage and water abatement features, as well as a woodland, grassland and hedgerow habitat” The Permit was not intended to provide a permanent facility at this location.</p> <p>2. On page 4 of the existing Permit it states in Clause 221 “The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit” This area is smaller than that outlined in the South London Waste Plan Consultation of the South London Waste Plan Consultation.</p> <p>3. The existing Permit states on page 5, Clause 233 “No waste shall be accepted for disposal at the site” Hence, it is misleading, if not incorrect, for the South London Waste Plan Consultation to state that there is an existing permit for inert waste disposal at this site.</p> <p>4. This site will need a new Planning Application if it is to be used as a permanent site for disposal of up to 99,999 tonnes of inert waste and therefore it is misleading to classify the site as having an existing Permit in the South London Waste Plan Consultation.</p> | Agree. As this site is a temporary site and does not contribute to the existing waste management totals, it is proposed to delete this site from the South London Waste Plan. |

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| | | <p>Green Belt</p> <p>5. The Parish Council is opposed to the development of Green Belt. It is not clear that there are sufficiently exceptional circumstances for having a permanent substantial waste disposal site at this location that outweigh the harm done to Green Belt, which is a requirement of DCLG's National Planning Policy Framework.</p> <p>6. The staff required to work at the proposed site will themselves generate regular traffic movements in addition to regular heavy traffic movements causing harm to a Green Belt location.</p> <p>Site Location</p> <p>7. Vehicles that plan to dispose of inert waste can access the site via the A3, A309 (Kingston By-Pass) and Woodstock Lane South thereby avoiding local roads. However, these vehicles can currently only leave the site via Claygate's local roads due to width restrictions at Clayton Road and inaccessibility to the A309 from Woodstock Lane South. This is not consistent with DCLG's "National Planning Policy for Waste Appendix B Locational Criteria clause f" which states "Consideration will include the suitability of the road network and the extent to which access would require reliance on local roads "</p> <p>8. Site traffic would currently have to leave via Woodstock Lane South towards Claygate as stated above. This stretch of road is widely used by horse riders, particularly during the summer months and school holidays. An increase in heavy duty vehicles leaving the proposed new site will pose a health and safety risk to horses and their riders in Clayton Road, Red Lane and those areas of Woodstock Lane South that do not have a bridleway.</p> <p>9. Site traffic would have to leave via Woodstock Lane South towards Claygate as stated above. This stretch of road that lies within Elmbridge and leads to Red Lane, Claygate is notorious for being the worst illegal dumping ground in Elmbridge if not the whole of Surrey. It costs Elmbridge rate payers a not inconsiderable sum of money to regularly clear waste dumped at this location. The risk of even further waste being dumped at this location if the proposed waste site is located at the Chessington Equestrian Centre due to the increased volume of</p> | |
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traffic that will have no choice but to travel via this route is highly likely. This would cause harm to the amenity and environment of Claygate residents.

10. The stretch of road from the A309 to Clayton Road via Woodstock Lane South is consistently in a very poor condition with many potholes. The resulting heavy road traffic will cause further damage to this stretch of road. Also, the junction between Woodstock Lane South and Clayton Road involves an awkward and tight T junction that will need to be redesigned to accommodate regular heavy traffic.

11. The above issues (Items 7 – 10) would be resolved if

- (i) access to enter A309 via Woodstock Lane South is created
- (ii) the stretch of road from Woodstock Lane South to the A309 is widened to accommodate two-way traffic of commercial vehicles
- (iii) the stretch of road from Woodstock Lane South to the A309 is strengthened and resurfaced
- (iv) width restrictions are imposed on Woodstock Lane South shortly after the junction with Clayton Road so that commercial vehicles cannot enter Claygate through local roads
- (v) The T junction between Woodstock Lane South and Clayton Road is redesigned to accommodate regular volumes of large and heavy vehicles

However, Surrey County Council have previously discounted the possibility of creating access to the A309 from Woodstock Lane South on safety grounds. Also, this would involve an expensive purchase of land from landowners such as Surbiton Golf Club.

12. Similar to Item 8 above, the stretch of road from the A309 to Clayton Road via Woodstock Lane South has become a permanent dumping ground. An increase in the volume of commercial traffic will inevitably lead to even further items being dumped at this location. In theory, the illegal dumping of waste could be partially mitigated by the use of CCTV. However, a prior attempt to install CCTV at the stretch of road identified in Item 8 resulted in the theft of the equipment within a matter of days.

13. There are two bridges over the A3 from the A309 to the proposed site neither of which are designed to accommodate regular heavy traffic. Both of these bridges, with the additional heavy goods road traffic this plan will generate, will

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| | | <p>almost certainly have their lifespan considerably shortened. The bridge in Clayton Road has already been damaged after a recent vehicle collision, so the additional regular heavy traffic may prove terminal and very costly.</p> <p>14. Claygate is notorious for land subsidence which throws doubt on the suitability of the proposed site that would need to have land sufficiently stable to permanently accommodate up to a capacity of 999,999 tonnes of inert waste. In particular it is not consistent with DCLG's "National Planning Policy for Waste Appendix B Locational Criteria clause b" which states "Land, and/or the environs of locations, that are liable to be affected by land instability, will not normally be suitable for waste management facilities"</p> <p>15. As mentioned in Item 1 above, the existing Permit was granted to construct "woodland, grassland and hedgerow habitat" A permanent inert waste disposal site at this location would disturb the biodiversity of life that will have settled in this area over the past 5 years.</p> <p>16. The Chessington Equestrian Centre site is at the extremity of the four South West London Boroughs, thus ensuring maximum road miles. This is inconsistent with the Elmbridge Climate Emergency Policy and the general trend towards reducing carbon emissions.</p> <p>17. The inert waste would be better processed and disposed of in the excavated gravel pits around Sunbury and Chertsey, thus providing new Green Belt land for planting of trees and improving local biodiversity in the short to medium term. This option, although further increasing road miles can be carried out with minimum disturbance to the surrounding population and minimal road redesign and building</p> | |
| 614 | Surrey County Council (C18) | <p>Chessington Equestrian Centre is located on the Kingston/Elmbridge border and we would question whether this site has an existing waste use. The permit for inert waste which was granted in 2014 for a specific non waste project (the creation of a ménage area and associated landscaping). Looking at the evidence we do not feel this site can be safeguarded for waste purposes as it is not currently occupied by a waste use.</p> <p>It is not clear if the introduction of a new waste use on this site is being proposed.</p> | <p>Agree. As this site is a temporary site and does not contribute to the existing waste management totals. It is proposed to delete this site from the South London Waste Plan.</p> |

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| | | <p>If it is, Surrey County Council would resist any proposals which would result in the accessing of this site from the Kingston bypass (A309). Highways England are the Highways Authority for the A3, which abuts the site immediately to the west.</p> <p>Furthermore, we would suggest that this site is not appropriate for a new waste use on the grounds of the site being located within Green Belt land. Our view is that any waste development within the Green Belt can only be justified if the needs cannot be met on land outside of the Green Belt. Therefore, we would suggest that this site is not appropriate for a new waste use due to access and Green Belt constraints.</p> | |
| 615 | Historic England (C21) | Chessington Equestrian Centre, Clayton Road Kingston is also over 0.5ha so again will need to be archaeologically considered. | Agree. As this site is a temporary site and does not contribute to the existing waste management totals. It is proposed to delete this site from the South London Waste Plan. |
| 616 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 617 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 618 | Resident SB of Sutton (C35) | This site should be safeguarded | Support welcomed. |
| 619 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 620 | Resident A of Sutton (C47) | This site should be safeguarded | Support welcomed. |
| 621 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should not be safeguarded | Noted. |

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| 622 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 623 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 624 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| K2: Genuine Solutions Group, Solutions House, Unit 1A, Kingston. KT6 7LD | | | |
| 625 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 626 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 627 | Resident SB of Sutton (C35) | This site should be safeguarded | Support welcomed. |
| 628 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 629 | Resident A of Sutton (C47) | This site should be safeguarded | Support welcomed. |
| 630 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 631 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 632 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |

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| 633 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| K3: Kingston Civic Amenity Site, Chapel Mill Road, off Villiers Road, Kingston. KT1 3GZ | | | |
| 634 | Veolia (C19) | This site is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. It is also used as part of the South London Waste Partnership Collection and Streets contract. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 635 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 636 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 637 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 638 | Resident SB of Sutton (C35) | This site should be safeguarded | Support welcomed. |
| 639 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 640 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 641 | Resident A of Sutton (C47) | This site should be safeguarded | Support welcomed. |
| 642 | Sutton Independent Residents/Cllr Tim Foster | This site should be safeguarded | Support welcomed. |

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| | (C50) | | |
| 643 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 644 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 645 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| K4:596 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston. KT1 3GZ | | | |
| 646 | Veolia (C19) | This site is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. It is also used as part of the South London Waste Partnership Collection and Streets contract. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 647 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 648 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 649 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 650 | Resident SB of Sutton (C35) | This site should be safeguarded | Support welcomed. |
| 651 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 652 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |

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| 653 | Resident A of Sutton (C47) | This site should be safeguarded | Support welcomed. |
| 654 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 655 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 656 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 657 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| Merton Sites - General Comments | | | |
| 658 | Wimbledon Park Residents' Association | <p>While the South London Waste Plan 2021-36 emphasises the importance of good air quality it does not contain any serious analysis of the air pollution resulting from waste processing in South London. A study of the air pollution due to the waste processing should have been carried out in the vicinity of where the waste is being processed rather than a hand waving assessment of its effects on the more distant air focus areas, some of which are not even subject to poor air quality. Such an assessment is particularly important for the waste being processed on Weir Road in the Durnsford industrial estate, whose surrounding area has levels of air pollution that are in excess of EU limits. As is clear to local residents these plants generate a substantial number of HGV movements on the local roads and as a result they have significantly increased the air pollution leading to poor health outcomes for local residents. The air pollution and traffic congestion due to these plants has never been assessed and the development and operation of these sites has not been properly controlled. We propose that air pollution and traffic generated by waste disposal should be accurately assessed in the South London Waste Plan 2021-36 and, where this is found to lead to unacceptable levels of air pollution and traffic congestion, restrictions should be placed on the amount of</p> | <p>Disagree. Merton Council is determined to improve air quality and undertakes thorough annual monitoring of air quality as well as having an action plan to improve air quality.</p> <p>As Merton Council's latest Air Quality Status Report shows (https://www.merton.gov.uk/assets/Documents/Annual%20Status%20Report%202019.pdf) the situation at monitoring stations No 26 (Gap Road) and No 27 ((Plough Lane) in annual mean Nitrogen Dioxide improved between 2017 and 2018. While the situation is still not satisfactory, the improvement is a step in the right direction. Any intensification of waste uses in the</p> |

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| | <p>waste being processed on the corresponding sites.</p> <p>[1] Air pollution is on average killing 33 people every day in London and one in eight people in Merton will die as a result of it. Waste management involves large numbers of HGV movements which inevitably increase air pollution and so leads to increased mortality rates. As such air quality is one of the most important considerations when arranging for the future provision of waste.</p> <p>[2] It is stated in the report "Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment" that Overall, the most important sustainability benefits of the preferred strategy include:.....minimising air pollution and potential impacts on sensitive land-uses and vulnerable receptors (including equalities target groups) arising from waste facilities by reducing waste- related HGV movements on the strategic/local road network..... In section 7.12 of this report under the heading Issue 10 Air Quality we find that the plan should for example avoid creating unacceptable risks of high levels of exposure to poor air quality, particularly for sensitive receptors. There are other statements along the same lines. Thus the report does give air pollution considerations a high priority.</p> <p>[3] The obvious approach to air pollution is to consider if a particular waste processing plant results in a significant increase in air pollution in an area that already exceeds the EU air pollution limits. Furthermore, should this be the case then this increase should be quantified so its effects can be properly understood. This way of proceeding is the one universally adopted in planning applications. If a proposed development will lead to a significant increase in air pollution in an area that exceeds the EU limits then the development will not satisfy planning guidelines and should be refused.</p> <p>[4] In contrast The South London Waste Plan 2021-36 adopts a quite different approach. It designates certain focus areas" and if the air pollution in these areas is not significantly affected by a waste processing plant then it is declared to be acceptable. This assessment is to be carried out in a hand waving manner, presumably based on the distance away the plant is from the closest air focus area. To make clear how far this approach differs from that which is normally undertaken let us consider a proposed development in Waterside Way, which is close to Weir Road. If the developer chose not to carry out an air quality</p> | <p>Durnsford Road Industrial area would need to meet Policy WP5 and there would be close scrutiny of any air quality impacts at a planning application stage.</p> <p>Furthermore, in accordance with the London Plan, the Submission Draft South London Waste proposes to safeguard (only) the three existing waste operators within the Durnsford Road Industrial area and more generally, it encourages the intensification of safeguarded sites "<i>...subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.</i>" The Submission Draft South London Waste is relying on the continued permitted capacity of these three sites but, as shown in Appendix 2, not on the intensification of their use.</p> |
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assessment in the surrounding roads, that is Plough Lane, Haydons Road and Gap Road, but instead decided to consider the effect of his proposed development on air pollution in Wimbledon Broadway, then his assessment would be inadequate and the application would be rejected.

[5] The air focus areas adopted in Merton are given in page 62 "Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road, Raynes Park junctions Kingston Road/Bushey Road and Mitcham London Road A216 from Cricket Green to Streatham Road Junction. The air quality monitoring in these areas as measured by Merton is given on page 64 of the report. There are no air quality results for the first focus area, the second does not exceed EU limits and the third only exceed the EU limits slightly. While the whole of Merton has been designated as an Air Quality Management Area the levels of pollution vary considerably across the borough. There are areas in Merton that do experience high levels of air pollution but the air focus areas selected in the South London Waste Plan in Merton are not really subject to significant air pollution. An important criterion in assessing air pollution is to assess the level of air pollution at the nearest receptors (residents) rather than at street level. However, The Broadway does not have residents living along its route and so the pollution levels at the nearest receptors are very low as the levels of air pollution fall off rapidly as one moves away from the road.

[6] The majority of construction and demolition waste that is processed in Merton (90 out of 150 tonnes per annum capacity table 3.4 page 17) is in the Durnsford industrial site, more precisely on Weir Road. The three plants involved are:

- NJB Recycling, 77 Weir Road, Merton (M12 page 71 of South London Waste Plan, Issues and Preferred Options)
- Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton (M14 page 73 of South London Waste Plan, Issues and Preferred Options)
- Maguire Skips, 36 Weir Court, Merton (M10 page 69 of South London Waste Plan, Issues and Preferred Options)

[7] The HGV vehicles carrying the waste to and from these plants travel down Plough Lane, Haydon's Road and Gap Road. Local residents have noticed an alarming increase in HGV movements associated with the above operations. One just has to stand by the sides of these roads to realise that there are very many

HGV's associated with the above plants travelling along these roads. Indeed the number of such HGV's is a very significant fraction of all HGV's travelling on these roads. The air pollution levels on these roads are very high and systematically exceed EU air pollution limits. The NO2 levels, as measured in 2017 (2018) by Merton Council, in Gap Road, Plough Lane and Haydons Road are 47 (45), 46 (45) and 46 (49). The results that are significantly over the EU limits. These three roads do have residential housing which is very close to the road side and so, unlike Wimbledon Broadway, the air pollution levels at the receptors are very high. While it is understandable that councils are still coming to terms with the relatively recent realisation that air pollution levels in London are causing death on a catastrophic scale, it is vital that this is correctly taken into account in major developments that increase the risk of such deaths. The three plants on Weir Road (M10, M12 and M14) are assessed on pages 144 and 145. Under AIR POLLUTION(10), HEALTH AND QUALITY OF LIFE (15) and SUSTAINABLE TRANSPORT (9) we have the assessments " +?" for the first two categories and "?" for the last for all three plants. As is clear to local residents these sites should score poorly for all of these categories.

[8] The adopted 2012 South London Waste Plan did not contain much discussion of the air pollution except for policy WP7 (page 48) WP7: Protecting and Enhancing Amenity Developments for waste facilities will be required to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.....(e) Air emissions arising from the plant and traffic generated;.....(g) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;... Examining the planning applications of the three plants in Weir Road mentioned above there does not appear to be any assessment of the air pollution they would cause on the local roads. Of course it is only relatively recently that the catastrophic effects of air pollution have become apparent but the fact remains that the three plants on Weir Road have been allowed to develop without any regard to the effects on air quality they have caused. Furthermore Merton Council did not appear to place any restrictions on the number of HGV movements due to the three plants on Weir Road, as might be expected by the adopted 2012 South London Waste Plan.

[9] The three plants mentioned above on the Durnsford industrial site are licensed

to increase their capacity by about 20, 000 + 27, 000 + 3, 000 = 50, 000 tonnes per annum for the disposal of construction and demolition waste. As a result the number of associated HGV vehicles on Plough Lane, Haydon's Road and Gap Road could significantly increase with a corresponding increase in air pollution and traffic congestion. This would have serious consequences of the health of the residents living near these roads. In short these plants have been allowed to develop in an unchecked way that is in contravention of the policies set out in the South London Waste Plan.

[10] One might have expected that the South London Waste Plan 2021-36 would rectify the problems that have been caused by air pollution and traffic congestion. However the proposed South London Waste Plan 2021-36 contains no serious analysis of the air pollution or traffic levels resulting from waste processing in South West London. These failures undermine the validity of the report as a whole and one can imagine that the South London Waste Plan might be rejected were it subjected to a judicial review on the grounds of air quality.

[11] To rectify these problems the following steps should be undertaken.

- As would be the case with any planning application a study to determine the increase in the air pollution and traffic congestion on the affected local roads due to the HGV traffic associated with each of the proposed, or existing, waste processing plants should be undertaken
- Should it turn out, as expected, that the waste processing activities in Weir Road are very significantly contributing to the levels of air pollution that are in excess of EU limits then limits should be placed on the amount of waste that can be processed in these plants. As a consequence these sites should not be safeguarded in their current form.
- As has been noted by local residents, and also discussed in the South London Waste Plan, the waste coming to Weir road comes from all over London and the south of London. Transporting all this waste far from where it is being produced very significantly increases the air pollution and traffic. Restrictions should be enforced to ensure that largely local waste is processed in Weir road.

[12] The waste processing plants on Weir Road adjoin the path along the river Wandle which is promoted as an important part of the Wandle Valley Regional Park. Clearly the presence of extensive waste processing with a few metres of the

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| | | path does not help with this objective. This proximity of the Sites on Weir Road was raised in the adopted 2012 South London Waste Plan but there seems to have been no corrective measures and the sites in Weir Road were allowed with few suitable restrictions. | |
| 659 | Resident LP of Sutton (C30) | Shut down the incinerator | Noted. |
| 660 | Resident JS of Sutton (C32) | The stink and air quality is already terrible from these sites and Cranmer school is located less than 100m from the Willow lane sites. The roads are not managed to these sites and fly-tipping happens every other day. The roads and sidewalks should be cleaned more often than other roads but this does not happen at all. Also how you can think of letting a bio waste facility next to the River Wandle? The Willow Lane industrial site has run its course and should close and be redeveloped. | Noted. |
| 661 | Resident JH of Sutton (C48) | How much is this all going to cost? | Noted. The plan and its implications come at no cost to the Councils |
| 662 | Resident LW of Sutton (C61) | Don't understand | Noted. |
| M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA | | | |
| 663 | National Grid (C3) | <p>Site crossed by overhead power line YYU Route – 275kv two circuit route from Wimbledon substation in Merton to Beddington substation in Sutton.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | Agree. The Councils will include a reference to the overhead power line in the 'Issues to Consider section of the site safeguarding. |

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| 664 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 665 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 666 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 667 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 668 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 669 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 670 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 671 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 672 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 673 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 674 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 675 | Resident PML of Sutton (C68) | This site should be safeguarded | Support welcomed. |

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

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| 676 | National Grid (C3) | <p>Site boundary crossed by overhead power line YYU Route – 275kv two circuit route from Wimbledon substation in Merton to Beddington substation in Sutton.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid’s guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | Agree. The Councils will include a reference to the overhead power line in the 'Issues to Consider section of the site safeguarding. |
| 677 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 678 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 679 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 680 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 681 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 682 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 683 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 684 | Sutton | This site should be safeguarded | Support welcomed. |

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| | Independent Residents/Cllr Tim Foster (C50) | | |
| 685 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 686 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 687 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 688 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 689 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 690 | Resident PML of Sutton (C68) | This site should be safeguarded | Support welcomed. |
| M3: Deadman Confidential, 35 Willow Lane, Merton, CR4 4NA | | | |
| 691 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 692 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 693 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 694 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 695 | Resident SAW | This site should be safeguarded | Support welcomed. |

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| | of Sutton (C34) | | |
| 696 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 697 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 698 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 699 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 700 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 701 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 702 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 703 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 704 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M4: Garth Road Civic Amenity Site, 66-69 Amenity Way, Garth Road, Merton. SM4 4AX | | | |
| 705 | Veolia (C19) | This site is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. It is also used as part of the South London Waste Partnership Collection and Streets contract. We are pleased to see that the site is | Noted. |

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| | | proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | |
| 706 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 707 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 708 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 709 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 710 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 711 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 712 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 713 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 714 | Resident JH of Sutton (C48) | This site should be safeguarded | Support welcomed. |
| 715 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 716 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |

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| 717 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 718 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 719 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 720 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| 721 | Resident PML of Sutton (C68) | This site should be safeguarded | Support welcomed. |
| M5: Garth Road Transfer Station, 66-60 Amenity Way, Garth Road, Merton SM4 4AX | | | |
| 722 | National Grid (C3) | <p>Site crossed by overhead power line ZZU Route – 275kv two circuit route from Chessington substation in Kingston upon Thames to Beddington substation in Sutton.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | Agree. The Councils will include a reference to the overhead power line in the 'Issues to Consider' section of the site safeguarding. |
| 723 | Veolia (C19) | This site is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. It is also used as part of the South London Waste Partnership Collection and Streets contract. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |

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| 724 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 725 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 726 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 727 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 728 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 729 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 730 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 731 | Resident JH of Sutton (C48) | This site should be safeguarded | Support welcomed. |
| 732 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 733 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 734 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 735 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |

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| 736 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 737 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| M6: George Killoughery, 41 Willow Lane, Merton CR4 4NA | | | |
| 738 | Wandle Valley Forum (C1) | <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting 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.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett's Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites.</p> <p>We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route along the east bank of the Wandle and, where appropriate, to secure its delivery.</p> | <p>The Councils will add a river Wandle 8-metre buffer zone requirement as part of the "issues to consider" section.</p> <p>The River Wandle is a designated 'main river'. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank.</p> <p>There should be a minimum 8 metres wide buffer zone along the River Wandle, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the watercourses and creates an undeveloped wildlife corridor for animals to move along.</p> |
| 739 | Transport for London (C7) | Proposals for waste sites located in close proximity to the existing London Trams network will require consultation with TfL. This includes sites that directly abut the tram line (M9 and S3). For these sites, the potential impact to tram infrastructure should be specified in the 'Issues to consider'. In addition, Heavy Goods Vehicles (HGVs) can contribute to additional wear and tear of the tram tracks where vehicles are required to route across existing lines. | Noted. However, the Councils consider it is prejudicious to identify two sites when other industrial vehicles arguably cause more 'wear and tear'. |
| 740 | Resident LP of | This site should not be safeguarded | Noted. |

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| | Sutton (C30) | | |
| 741 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 742 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 743 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 744 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 745 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 746 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 747 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 748 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 749 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 750 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M7: LMD Waste Management, Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton. CR4 4NA | | | |
| 751 | Resident PS of | This site should be safeguarded | Support welcomed. |

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| | Sutton (C27) | | |
| 752 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 753 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 754 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 755 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 756 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 757 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 758 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 759 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 760 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 761 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 762 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |

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| 763 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M8: LMD Waste Management, 32 Willow Lane, Merton. CR4 4NA | | | |
| 764 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 765 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 766 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 767 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 768 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 769 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 770 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 771 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 772 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 773 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |

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| 774 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 775 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 776 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 777 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M9: Maguire Skips, Storage Yard, Wandle Way, Merton. CR4 4NB | | | |
| 778 | Maguire Skips (C9) | <p>I write on behalf of my client Maguire Skips Ltd concerning the above consultation. I act as their planning agent. The document lists two sites at M9 page 68 and M10 page 69 in association with the company.</p> <p>Maguire Skips are an independent South London waste recovery business that has an operational market that captures South London and North Surrey. I would be grateful if you could note that the Company has recently assigned control of the Weir Rd site to Powerday Ltd and as a consequence they now only run the site at Wandle Way.</p> <p>The company considers that the Wandle Way site should be safeguarded for waste uses.</p> | Noted. The Councils will make the necessary amendments to the safeguarded sites. |
| 779 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 780 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 781 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 782 | Resident K of | This site should be safeguarded | Support welcomed. |

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| | Sutton (C33) | | |
| 783 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 784 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 785 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 786 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 787 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 788 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 789 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 790 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 791 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M10 Maguire Skips, 36 Weir Court, Merton SW19 8UG | | | |
| 792 | Wandle Valley Forum (C1) | The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting the character of the Wandle, its ability to operate as a naturally functioning river and the provision of open space | The Councils will add a river Wandle 8-metre buffer zone requirement as part of the "issues to consider" section. |

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| | | and public access along the river bank. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14. | <p>The River Wandle is a designated 'main river'. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank.</p> <p>There should be a minimum 8 metres wide buffer zone along the River Wandle, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the watercourses and creates an undeveloped wildlife corridor for animals to move along.</p> |
| 793 | Transport for London (C7) | <p>Three sites within the plan (M10, M12 and M14) are located within the Weir Road industrial estate, on land that was included in a consultation exercise in 2015 to be used as a future worksite and depot for Crossrail 2. A large site is required at the south end of the tunnelled section, and this location was selected due to the close proximity to Crossrail 2's southern hub at Wimbledon, allowing trains to enter and leave service promptly. Whilst it is noted that the sites are outside of the limits of the Crossrail 2 Safeguarding Direction, any plans to redevelop the sites should be refused, in line with draft London Plan policy T3 (London Plan policy 6.2). Reference to the requirement of these sites for Crossrail 2 should be included in the 'Issues to consider'.</p> | Disagree. The site is outside the Crossrail 2 Safeguarding Direction, Crossrail 2 is currently unfunded and, if delivered - according to the Crossrail 2 website, construction is not due to start until the "2020s/2030s" – commencement is likely to be beyond the end of the plan period for this Local Plan document. |
| 794 | Maguire Skips (C9) | <p>I write on behalf of my client Maguire Skips Ltd concerning the above consultation. I act as their planning agent. The document lists two sites at M9 page 68 and M10 page 69 in association with the company.</p> <p>Maguire Skips are an independent South London waste recovery business that has an operational market that captures South London and North Surrey. I would be grateful if you could note that the Company has recently assigned control of the Weir Rd site to Powerday Ltd and as a consequence they now only run the site at Wandle Way.</p> | Noted. The Councils will make the necessary amendments to the safeguarded sites. |

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| | | The company considers that the Wandle Way site should be safeguarded for waste uses. | |
| 795 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 796 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 797 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 798 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 799 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 800 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 801 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 802 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 803 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 804 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 805 | Resident JK of | This site should be safeguarded | Support welcomed. |

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| | Sutton (C56) | | |
| 806 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M11: Morden Transfer Station, Amenity Way, Merton. SM4 4AX | | | |
| 807 | SUEZ (C20) | <p>SUEZ is the operator of this site and agrees that it should be safeguarded for waste uses.</p> <p>When considering the first bullet point regarding operations being carried out within a fully enclosed building, we repeat our comments relating to Question WP5. The site currently benefits from a large yard similar to many of the adjacent industrial uses. It may not be necessary for all operations to be carried out within a fully enclosed building</p> | Noted and the issue of operations being carried out in fully, enclosed buildings has been discussed under WP5. |
| 808 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 809 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 810 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 811 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 812 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 813 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 814 | Sutton Independent Residents/Cllr | This site should be safeguarded | Support welcomed. |

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| | Tim Foster (C50) | | |
| 815 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 816 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 817 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 818 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 819 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| M12: NJB Recycling, 77 Weir Road, Merton SW19 8UG | | | |
| 820 | Wandle Valley Forum (C1) | The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting 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. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14. | <p>The Councils will add a river Wandle 8-metre buffer zone requirement as part of the "issues to consider" section.</p> <p>The River Wandle is a designated 'main river'. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank.</p> <p>There should be a minimum 8 metres wide buffer zone along the River Wandle, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the</p> |

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| | | | watercourses and creates an undeveloped wildlife corridor for animals to move along. |
| 821 | Transport for London (C7) | Three sites within the plan (M10, M12 and M14) are located within the Weir Road industrial estate, on land that was included in a consultation exercise in 2015 to be used as a future worksite and depot for Crossrail 2. A large site is required at the south end of the tunnelled section, and this location was selected due to the close proximity to Crossrail 2's southern hub at Wimbledon, allowing trains to enter and leave service promptly. Whilst it is noted that the sites are outside of the limits of the Crossrail 2 Safeguarding Direction, any plans to redevelop the sites should be refused, in line with draft London Plan policy T3 (London Plan policy 6.2). Reference to the requirement of these sites for Crossrail 2 should be included in the 'Issues to consider'. | Disagree. The site is outside Crossrail 2 Safeguarding Direction, Crossrail 2 is not certain to be delivered as it is under a financial review and, if delivered, on the current Crossrail 2 website construction is shown as not due to start until the 2020s/2030s. Therefore, there is a distinct possibility that construction on Crossrail 2 may not start until beyond the end of the plan period. |
| 822 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 823 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 824 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 825 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 826 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 827 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 828 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |

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| 829 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 830 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 831 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 832 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 833 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M13: One Waste Clearance. Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton. CR4 4NA | | | |
| 834 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 835 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 836 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 837 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 838 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 839 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 840 | Sutton Independent Residents/Cllr | This site should be safeguarded | Support welcomed. |

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| | Tim Foster (C50) | | |
| 841 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 842 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 843 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 844 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 845 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M14: Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG | | | |
| 846 | Wandle Valley Forum (C1) | The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting 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. This includes providing a sympathetic boundary to the Wandle Trail for sites M10, M12 and M14. | <p>The Councils will add a river Wandle 8-metre buffer zone requirement as part of the "issues to consider" section.</p> <p>The River Wandle is a designated 'main river'. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank.</p> <p>There should be a minimum 8 metres wide buffer zone along the River Wandle, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the</p> |

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| | | | watercourses and creates an undeveloped wildlife corridor for animals to move along. |
| 847 | Transport for London (C7) | Three sites within the plan (M10, M12 and M14) are located within the Weir Road industrial estate, on land that was included in a consultation exercise in 2015 to be used as a future worksite and depot for Crossrail 2. A large site is required at the south end of the tunnelled section, and this location was selected due to the close proximity to Crossrail 2's southern hub at Wimbledon, allowing trains to enter and leave service promptly. Whilst it is noted that the sites are outside of the limits of the Crossrail 2 Safeguarding Direction, any plans to redevelop the sites should be refused, in line with draft London Plan policy T3 (London Plan policy 6.2). Reference to the requirement of these sites for Crossrail 2 should be included in the 'Issues to consider'. | Disagree. The site is outside Crossrail 2 Safeguarding Direction, Crossrail 2 is not certain to be delivered as it is under a financial review and, if delivered, on the current Crossrail 2 website, construction is not due to start until the 2020s/2030s. Therefore, there is a distinct possibility that construction on Crossrail 2 may not start until beyond the end of the plan period. |
| 848 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 849 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 850 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 851 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 852 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 853 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 854 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 855 | Sutton Independent Residents/Cllr | This site should be safeguarded | Support welcomed. |

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| | Tim Foster (C50) | | |
| 856 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 857 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 858 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 859 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 860 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M15: Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA | | | |
| 861 | Wandle Valley Forum (C1) | <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting 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.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett's Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites.</p> <p>We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route</p> | <p>The Councils will add a river Wandle 8-metre buffer zone requirement as part of the "issues to consider" section.</p> <p>The River Wandle is a designated 'main river'. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank.</p> <p>There should be a minimum 8 metres wide buffer zone along the River Wandle, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the</p> |

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| | | along the east bank of the Wandle and, where appropriate, to secure its delivery. | watercourses and creates an undeveloped wildlife corridor for animals to move along. |
| 862 | Historic England (C21) | These sites lie to the immediate west of the Wandle Valley Conservation Area. Further development of these sites has the potential to impact the setting of the conservation area. We suggest that the presence of the conservation area is referenced in the planning designation and issues to consider sections of the schedule so that it can be considered from the outset in the design and mitigation process. | Agree. The Councils will make the necessary amendments |
| 863 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 864 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 865 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 866 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 867 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 868 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 869 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 870 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 871 | Resident LS of | This site should be safeguarded | Support welcomed. |

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| | Sutton (C53) | | |
| 872 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 873 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 874 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M16: Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA | | | |
| 875 | Wandle Valley Forum (C1) | <p>The South London Waste Plan should explicitly support any development of sites M6, M10, M12, M14, M15 and M16 respecting 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.</p> <p>Additionally, sites M6, M15 and M16 can play an important role in securing greater access along the Wandle. There is growing realisation of the potential for a new public route running along the east side of the Wandle south from Bennett's Hole Local Nature Reserve. This would provide a new boundary for Willow Lane Trading Estate offering better access and an improved environment for local businesses and their employees as well as residents. The space for this new route exists along a large part of the river and it can be secured by being addressed as part of any future plans for the development of these two sites.</p> <p>We ask that the South London Waste Plan supports any future development of sites M6, M15 and M16 to include safeguarding provisions for a new public route along the east bank of the Wandle and, where appropriate, to secure its delivery.</p> | <p>The Councils will add a river Wandle 8-metre buffer zone requirement as part of the "issues to consider" section.</p> <p>The River Wandle is a designated 'main river'. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank.</p> <p>There should be a minimum 8 metres wide buffer zone along the River Wandle, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the watercourses and creates an undeveloped wildlife corridor for animals to move along.</p> |
| 876 | Historic England (C21) | These sites lie to the immediate west of the Wandle Valley Conservation Area. Further development of these sites has the potential to impact the setting of the conservation area. We suggest that the presence of the conservation area is referenced in the planning designation and issues to consider sections of the | Agree. The Councils will make the necessary amendments |

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| | | schedule so that it can be considered from the outset in the design and mitigation process. | |
| 877 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 878 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 879 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 880 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 881 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 882 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 883 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 884 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 885 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 886 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 887 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |

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| 888 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 889 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M17: UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton. CR4 8NA | | | |
| 890 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 891 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 892 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 893 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 894 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 895 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 896 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 897 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 898 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |

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| 899 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 900 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 901 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| M18: Wandle Waste Management, Unit 7, Abbey Industrial Estate, Willow Lane, Merton. CR4 4NA | | | |
| 902 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 903 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 904 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 905 | Resident SAW of Sutton (C34) | This site should be safeguarded | Support welcomed. |
| 906 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 907 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 908 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 909 | Resident of S of Sutton (C51) | This site should not be safeguarded | Noted. |

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| 910 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 911 | Resident AS of Sutton (C55) | This site should be safeguarded | Support welcomed. |
| 912 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 913 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| Sutton Sites - General Comments | | | |
| 914 | Resident PP of Sutton (C25) | <p>An increase in HGVs which will add to an already congested B road ie Beddington Lane which is route to the incinerator. The pollution is already high from the use of vehicles which travel through Beddington village.</p> <p>This waste plan would increase would increase this.</p> <p>I don't pretend to understand the tonnage waste that will go the incinerator but I do understand that it will be a great more than the present time.</p> <p>Which, of course, will be burnt in the incinerator. More pollution.</p> <p>We were promised at a meeting that when the incinerator was built that no HGVs would go through the village was built. I can only say that HGVs have increased again pollution.</p> <p>There was a ban planned for HGVs through the village along with 20mph speed limit. In fairness to the council, they painted some signs on the tarmac. Shame the HGVs can't read.</p> <p>In short and to answer to the waste plan, put it somewhere else we have enough pollution thanks.</p> | <p>Noted. The South London Waste Plan is proposing no new sites for waste management than the sites and only a modest intensification of a few sites to meet the Mayor of London's targets for waste management.</p> <p>As regards traffic on Beddington Lane, LB Sutton carried out the Statutory Consultation in March 2019 about the proposed Traffic Management Order PR 1063 – the Beddington Village Heavy Goods Vehicle (HGVs) restriction extension. Given the level of interest and the sensitive nature of the proposals, LB Sutton has now taken the decision to defer the rollout of these proposed restrictions for a few months. This will allow LB Sutton to address questions and concerns raised, do further engagement with affected businesses, and undertake additional monitoring to ensure the evidence base for</p> |

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| | | | the scheme is robust, as well as allow the completion of various other roadworks in the area which are impacting the network. |
| 915 | Resident AH of Sutton (C26) | <p>I would like to make the following comments:</p> <p>The vast majority of proposed sites in Sutton are in the Beddington area. This seems disproportionate, especially as many of the sites in Merton are only just across the boundary in Mitcham. Indeed, it looks very much as though this particular area has been picked out specifically to bear the brunt of local waste processing, well away from the 'nicer' residential areas. Why is so little value attached to the quality of life of Beddington residents?</p> <p>What efforts are being made to minimise the impact of traffic on Beddington residents? This is a real problem at the moment, with Beddington Lane barely able to cope with the large numbers of lorries thundering past practically 24/7. I note the advice to site owners re managing traffic, but there is no sign currently that they are making any real effort to do so.</p> | It is true that the Beddington Lane Industrial Estate and the Willow Lane Industrial Estate in Merton are providing the majority of the capacity and both these estates are close to residents of Beddington Corner, Hackbridge and Beddington. The concentration of waste uses in these areas are (1) there has always been industrial processes along the River Wandle and (2) a function of the market with industrial rents lower in Beddington and Willow Lane than other areas of south London. Sutton Council intends to improve the situation with this waste plan, which meets the Mayor's targets with no new waste sites and the Beddington Lane improvements programme which will improve the environment along and around Beddington Lane. |
| 916 | Resident MS of Sutton (C28) | All useful sites for residents to use | Noted. |
| 917 | Resident LP of Sutton (C30) | Shut down the incinerator | Noted. |
| 918 | Resident JA Of Sutton (C31) | The Kimpton recycling centre (S7) is an excellent and well run facility which is of great benefit to the community. | Support welcomed. |
| 919 | Resident JH of Sutton (C48) | How much is this all going to cost? Will this be another failure from Sutton Council like the one in hiring Veolia? | Noted. The plan and its implications come at no cost to the Councils |
| 920 | Sutton | The concrete lorries are overloaded and waste concrete comes off the lorries and | Noted. However, the loading of concrete |

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| | Independent Residents/Cllr Tim Foster (C50) | messes up Beddington Lane, The Country Skips site should not have been granted planning permission on the tenuous excuse of a judgement in 2014 that work had commenced and extant planning applied. | lorries is not a planning policy matter. The SUEZ permission on the former Country Skips land was considered thoroughly by officers and at Sutton Planning Committee |
| 921 | Resident RB of Sutton (C60) | Kimpton is easily accessible for my home, and I use it on a regular basis | Noted. |
| 922 | Resident LW of Sutton (C61) | Don't understand this bit | Noted. |
| 923 | Resident MF of Sutton (C63) | This is a ridiculously complex survey | Noted. |
| 924 | Resident Anonymous of Sutton (C67) | As a resident in Beddington I am concerned about both the environmental impact on the area and the increase of traffic along Beddington Lane by further waste development in the area. Beddington Lane is already a concern for me as a regular pedestrian who has had several near misses at the zebra crossing by the BP Garage and often have to walk alongside stationary or slow moving congested traffic. Whilst your plans for each of the sites in the Beddington are mention part of an industrial are it does not mention that many of these sites are also close to residential homes and schools. | <p>Noted. The South London Waste Plan is proposing no new sites for waste management than the sites and only a modest intensification of a few sites to meet the Mayor of London's targets for waste management.</p> <p>As regards traffic on Beddington Lane, LB Sutton carried out the Statutory Consultation in March 2019 about the proposed Traffic Management Order PR 1063 – the Beddington Village Heavy Goods Vehicle (HGVs) restriction extension. Given the level of interest and the sensitive nature of the proposals, LB Sutton has now taken the decision to defer the rollout of these proposed restrictions for a few months. This will allow LB Sutton to address questions and concerns raised, do further engagement with affected businesses, and undertake additional monitoring to ensure the evidence base for the scheme is robust, as well as allow the</p> |

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| | | | completion of various other roadworks in the area which are impacting the network. |
| S1: 777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TQ | | | |
| 925 | National Grid (C3) | Site is near to underground electricity cable Bedd2-Wisd2 1 DC Cable Section 04 | Agree. The Councils will include a reference to the nearby power line in the 'Issues to Consider' section of the site safeguarding. |
| 926 | Transport for London (C7) | Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'. | Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding. |
| 927 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 928 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 929 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 930 | Resident JS of Sutton (C32) | This site should not be safeguarded | Noted. |
| 931 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |

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| 932 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 933 | Resident TP of Sutton (C37) | This site should be safeguarded | Support welcomed. |
| 934 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 935 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 936 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 937 | Resident JH of Sutton (C48) | This site should be safeguarded | Support welcomed. |
| 938 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should not be safeguarded | Noted. |
| 939 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 940 | Resident AM of Sutton (C52) | This site should be safeguarded | Support welcomed. |
| 941 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 942 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 943 | Resident RS of Sutton (C58) | This site should be safeguarded | Support welcomed. |

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| 944 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 945 | Resident RD of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 946 | Resident PMC of Sutton (C69) | This site should be safeguarded | Support welcomed. |
| S2 Beddington Farmlands ERF, Beddington Waste Management Facility, 105 Beddington Lane, Sutton CR0 4TD | | | |
| 947 | National Grid (C3) | <p>Site crossed by overhead power lines YYU Route – 275kv two circuit route from Wimbledon substation in Merton to Beddington substation in Sutton ZZU Route – 275kv two circuit route from Chessington substation in Kingston upon Thames to Beddington substation in Sutton.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | Agree. The Councils will include a reference to the overhead power lines in the 'Issues to Consider' section of the site safeguarding. |
| 948 | Transport for London (C7) | Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' | Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding. |

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| | | should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'. | |
| 949 | Resident PS of Sutton (C27) | This site should be safeguarded | Noted. |
| 950 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 951 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 952 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 953 | Resident K of Sutton (C33) | This site should not be safeguarded | Noted. |
| 954 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 955 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 956 | Resident TP of Sutton (C37) | This site should be safeguarded | Support welcomed. |
| 957 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 958 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 959 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 960 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |

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| 961 | Resident A of Sutton (C47) | This site should be safeguarded | Support welcomed. |
| 962 | Resident ST of Sutton (C49) | This site should be safeguarded | Support welcomed. |
| 963 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 964 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 965 | Resident AM of Sutton (C52) | This site should be safeguarded | Support welcomed. |
| 966 | Resident LS of Sutton (C53) | This site should not be safeguarded | Noted. |
| 967 | Resident AW of Sutton (C54) | This site should not be safeguarded | Noted. |
| 968 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 969 | Resident RS of Sutton (C58) | This site should be safeguarded | Support welcomed. |
| 970 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| 971 | Resident CS of Sutton (C62) | This site should not be safeguarded | Noted. |
| 972 | Resident MR of Sutton (C65) | This site should not be safeguarded | Noted. |

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| 973 | Resident RD of Sutton (C66) | This site should not be safeguarded | Noted. |
| 974 | Resident Anonymous of Sutton (C67) | This site should not be safeguarded | Noted. |
| 975 | Resident PMC of Sutton (C69) | This site should not be safeguarded | Noted. |
| S3: Cannon Hygiene, Unit 4, Beddington Industrial Estate, 109-131 Beddington Lane, Sutton. CR0 4TD | | | |
| 976 | Transport for London (C7) | Proposals for waste sites located in close proximity to the existing London Trams network will require consultation with TfL. This includes sites that directly abut the tram line (M9 and S3). For these sites, the potential impact to tram infrastructure should be specified in the 'Issues to consider'. In addition, Heavy Goods Vehicles (HGVs) can contribute to additional wear and tear of the tram tracks where vehicles are required to route across existing lines. | Noted. However, the Councils consider it is prejudicious to identify two sites when other industrial vehicles arguably cause more 'wear and tear'. |
| 977 | Transport for London (C7) | Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'. | Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding. |
| 978 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 979 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |

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| 980 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 981 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 982 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 983 | Resident SB of Sutton (C35) | This site should not be safeguarded | Support welcomed. |
| 984 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 985 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 986 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 987 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 988 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 989 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 990 | Resident LS of Sutton (C53) | This site should not be safeguarded | Noted. |
| 991 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |

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| 992 | Resident RS of Sutton (C58) | This site should be safeguarded | Support welcomed. |
| 993 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 994 | Resident RD of Sutton (C66) | This site should be safeguarded | Support welcomed. |
| 995 | Resident Anonymous of Sutton (C67) | This site should be safeguarded | Support welcomed. |
| S4: Croydon Transfer Station, Endeavour Way, Beddington farm Road, Sutton. CR0 4TR | | | |
| 996 | Transport for London (C7) | Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'. | Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding. |
| 997 | Veolia (C19) | This site is our commercial waste depot. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 998 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 999 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |

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| 1000 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1001 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 1002 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1003 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1004 | Resident JM of Sutton (C38) | This site should be safeguarded | Support welcomed. |
| 1005 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1006 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1007 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 1008 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 1009 | Resident S of Sutton (C51) | This site should be safeguarded | Support welcomed. |
| 1010 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1011 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |

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| 1012 | Resident RS of Sutton (C58) | This site should be safeguarded | Support welcomed. |
| 1013 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| S5: Hinton Skips, Land to the rear of 112 Beddington Lane Sutton CR0 4YZ | | | |
| 1014 | National Grid (C3) | <p>Site crossed by overhead power lines YYU Route – 275kv two circuit route from Wimbledon substation in Merton to Beddington substation in Sutton ZZU Route – 275kv two circuit route from Chessington substation in Kingston upon Thames to Beddington substation in Sutton</p> <p>The site is also crossed by underground electricity cable Kingsnorth-Beddington.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | Agree. The Councils will include a reference to the overhead power lines in the 'Issues to Consider' section of the site safeguarding. |
| 1015 | Transport for London (C7) | Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network | Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding. |

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| | | which should be discussed with TfL'. | |
| 1016 | Hinton Skips Ltd (C10) | <p>I write on behalf of my client Hinton Skips Ltd concerning the above consultation. I act as their planning agent. Their site at 112 Beddington lane, Sutton is listed as site S5 on page 83 of the document.</p> <p>Hinton Skips are an independent South London waste recovery business that specialise in the supply of skips to the domestic and commercial markets. Their operations at the site are subject to planning permission reference D2017/76638/FUL dated 26th June 2017.</p> <p>The company considers that the site should be safeguarded for waste uses.</p> | Noted. |
| 1017 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 1018 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1019 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1020 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 1021 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1022 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1023 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1024 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1025 | Sutton | This site should be safeguarded | Support welcomed. |

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| | Independent Residents/Cllr Tim Foster (C50) | | |
| 1026 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1027 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1028 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 1029 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| S6: Hydro Cleansing, Hill House, Beddington Farm Road, Sutton. CR0 4XB | | | |
| 1030 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1031 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1032 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 1033 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 1034 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1035 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1036 | Resident LF of | This site should not be safeguarded | Noted. |

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| | Sutton (C43) | | |
| 1037 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1038 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 1039 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1040 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1041 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 1042 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| S7: Kimpton Park Way Household Rescue and Recycling Centre, Kimpton Park Way Sutton SM3 9QH | | | |
| 1043 | National Grid (C3) | <p>Site crossed by overhead power line ZZU Route – 275kv two circuit route from Chessington substation in Kingston upon Thames to Beddington substation in Sutton.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20ov</p> | Agree. The Councils will include a reference to the overhead power lines in the 'Issues to Consider section of the site safeguarding. |

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| | | erhead%20lines_0.pdf | |
| 1044 | Veolia | This is a household, reuse and recycling site which Veolia runs for the South London Waste Partnership. We are pleased to see that the site is proposed to be safeguarded for future waste uses under proposed policy WP3 (Safeguarding of Existing Waste Sites). | Noted. |
| 1045 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 1046 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1047 | Resident OW of Sutton (C29) | This site should be safeguarded | Support welcomed. |
| 1048 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1049 | Resident JA of Sutton (C31) | This site should be safeguarded | Support welcomed. |
| 1050 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 1051 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |
| 1052 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1053 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1054 | Resident TP of Sutton (C37) | This site should be safeguarded | Support welcomed. |
| 1055 | Resident JM of | This site should be safeguarded | Support welcomed. |

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| | Sutton (C38) | | |
| 1056 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1057 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1058 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 1059 | Resident A of Sutton (C47) | This site should be safeguarded | Support welcomed. |
| 1060 | Resident JH of Sutton (C48) | This site should be safeguarded | Support welcomed. |
| 1061 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 1062 | Resident S of Sutton (C51) | This site should be safeguarded | Support welcomed. |
| 1063 | Resident AM of Sutton (C52) | This site should be safeguarded | Support welcomed. |
| 1064 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1065 | Resident AW of Sutton (C54) | This site should be safeguarded | Support welcomed. |
| 1066 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |

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| 1067 | Resident JT of Sutton (C57) | This site should be safeguarded | Support welcomed. |
| 1068 | Resident RS of Sutton (C58) | This site should be safeguarded | Support welcomed. |
| 1069 | Resident CC of Sutton (C59) | This site should be safeguarded | Support welcomed. |
| 1070 | Resident RB of Sutton (C60) | This site should be safeguarded | Support welcomed. |
| 1071 | Resident CS of Sutton (C62) | This site should be safeguarded | Support welcomed. |
| 1072 | Resident RA of Sutton (C64) | This site should be safeguarded | Support welcomed. |
| 1073 | Resident RD of Sutton (C66) | This site should be safeguarded | Support welcomed. |
| 1074 | Resident Anonymous of Sutton (C67) | This site should be safeguarded | Support welcomed. |
| 1075 | Resident PML of Sutton (C68) | This site should be safeguarded | Support welcomed. |
| 1076 | Resident PMC of Sutton (C69) | This site should be safeguarded | Support welcomed. |
| S8: King Concrete, 124 Beddington Lane, Sutton CR0 4YZ | | | |
| 1077 | National Grid (C3) | Site crossed by overhead power line YYU Route – 275kv two circuit route from Wimbledon substation in Merton to Beddington substation in Sutton. The statutory safety clearances between overhead lines, the ground, and built | Agree. The Councils will include a reference to the overhead power lines in the 'Issues to Consider section of the site safeguarding. |

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| | | <p>structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | |
| 1078 | Transport for London (C7) | <p>Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'.</p> | <p>Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding.</p> |
| 1079 | King Concrete Ltd (C11) | <p>I write on behalf of my client King Concrete Ltd concerning the above consultation. I act as their planning agent. Their site at 124 Beddington lane, Sutton is listed as site S8 on page 86 of the document.</p> <p>King Concrete are volumetric supplier of concrete and screed that incorporates demolition and construction waste. Their operations at the site are subject to planning permission reference D2016/74915/FUL dated 13th October 2016 with implementation commencing 8th September 2019. The site is currently undergoing construction.</p> <p>The company considers that the site should be safeguarded for waste uses and advocate that the land immediately to the south of them at No 122 Beddington Lane be included also. This consists of an open yard and a warehouse building. Inclusion within the emerging plan will make it easier for them to bring future expansion proposals forward whilst also protecting their licence to operate from</p> | <p>Noted.</p> |

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| | | potential alien land-uses that may be inappropriate to their operations. | |
| 1080 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1081 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1082 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 1083 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1084 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1085 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1086 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 1087 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should not be safeguarded | Noted. |
| 1088 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1089 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1090 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |

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| 1091 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 1092 | Resident Anonymous of Sutton (C67) | This site should not be safeguarded | Noted. |
| S9: Premier Skip Hire, Unit 12, Sandiford Road, Sutton. SM3 9RD | | | |
| 1093 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 1094 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1095 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1096 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1097 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1098 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1099 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1100 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 1101 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |

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| 1102 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1103 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1104 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 1105 | Resident RS of Sutton (C58) | This site should be safeguarded | Support welcomed. |
| 1106 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 1107 | Resident Anonymous of Sutton (C67) | This site should not be safeguarded | Noted. |
| S10: Raven Recycling, Unit 8-9 Endeavour Way, Beddington farm Road, Sutton. CR0 4TR | | | |
| 1108 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 1109 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1110 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1111 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1112 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1113 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |

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| 1114 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1115 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 1116 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 1117 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1118 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1119 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 1120 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 1121 | Resident Anonymous of Sutton (C67) | This site should not be safeguarded | Noted. |
| S11: TGM Environmental, 112 Beddington Lane, Sutton. CR0 4TD | | | |
| 1122 | Resident PS of Sutton (C27) | This site should be safeguarded | Support welcomed. |
| 1123 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1124 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |

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| 1125 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1126 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1127 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1128 | Resident JK of Sutton (C44) | This site should be safeguarded | Support welcomed. |
| 1129 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should be safeguarded | Support welcomed. |
| 1130 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1131 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1132 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 1133 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 1134 | Resident Anonymous of Sutton (C67) | This site should not be safeguarded | Noted. |
| S12 Beddington Lane Resource Recovery Facility 7985 Beddington Lane Sutton CR0 4TH | | | |
| 1135 | National Grid | Site crossed by overhead power lines | Agree. The Councils will include a |

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| | (C3) | <p>YYU Route – 275kv two circuit route from Wimbledon substation in Merton to Beddington substation in Sutton ZZU Route – 275kv two circuit route from Chessington substation in Kingston upon Thames to Beddington substation in Sutton.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Overhead Lines here https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> | reference to the overhead power lines in the 'Issues to Consider section of the site safeguarding. |
| 1136 | Transport for London (C7) | <p>Where sites are proposed within the plan for intensification, or compensatory sites are required, particular consideration of the impacts of additional freight traffic will be required. The impact of additional freight traffic on junctions on the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) will need to be considered as part of any planning application. Highway modelling may be required where the network is particularly constrained, or where the cumulative impact is likely to be severe. For instance, the intensification of sites around Beddington Lane (S1, S2, S3, S4, S5, S8, and S12) is of particular concern, including the impact on the A23 corridor. For these sites the 'Issues to consider' should include 'assessment of the cumulative impacts on the highway network which should be discussed with TfL'.</p> | Agree. The Councils will make the necessary additions in the 'Issues to Consider' section of the site safeguarding. |
| 1137 | SUEZ (C20) | <p>SUEZ currently operates two facilities in the SLWP area, Benedict Wharf in Mitcham and Morden Transfer Station (Site M11). In addition, SUEZ is the owner of Beddington Lane Resource Recovery Facility (BLRRF) (Site S12) that has planning permission but is not yet constructed.</p> <p>SUEZ owns and operates a waste transfer and recycling facility on Benedict Wharf, Hallowfield Way, Mitcham. We have been working with London Borough of Merton Council (LBM) to promote the site for residential development in the emerging Merton Local Plan (MLP), since Benedict Wharf was submitted to the</p> | Noted. |

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| | <p>call for sites process in January 2018. Benedict Wharf is currently allocated for “Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable” within the emerging MLP.</p> <p>In June 2019, SUEZ submitted an outline planning application (ref: 19/P2383) with all matters reserved for a residential redevelopment at Benedict Wharf. The application is currently being considered following extended liaison with the Greater London Authority (GLA).</p> <p>SUEZ has operated at Benedict Wharf since 2000 when the majority of the site was acquired as part of the acquisition of United Waste. The former Mitchanol Ink works was purchased separately in 2007. Benedict Wharf is currently safeguarded in the adopted SLWP and is also an allocated Strategic Industrial Location (SIL).</p> <p>The site contains a Waste Transfer Station (WTS) which bulks non-recyclable ‘residual materials for transfer and processing elsewhere, a Materials Recycling Facility (MRF) for the sorting and separation of recyclable materials for transfer and processing elsewhere a range of ancillary infrastructure such as processing equipment, storage and a weighbridge / site offices and parking.</p> <p>As the facilities have developed in a gradual, ‘ad-hoc’ manner since around 1989, the site is not as efficient as modern waste management infrastructure. There is only one weighbridge for all activities and this is located within the central area, making vehicle circulation less effective than modern facilities.</p> <p>During recent years the waste industry has been in a rapid transition and SUEZ has progressed from being a predominantly landfill dominated waste disposal business, to a model which focuses on resource management and the recycling and recovery of secondary raw materials. Operations are now typically more industrial / manufacturing in character and require similar land, facilities and infrastructure. In order for waste management facilities to be viable and sustainable, particularly in London and the South East, it is essential that operations can be undertaken with efficient processing technologies, economies of scale and in a relatively unconstrained environment. Particularly critical is the ability to transport materials 24 hours a day, or certainly having the flexibility to</p> | |
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transport during some of the less congested hours.

In 2008, a planning application was submitted for the development of an 'ecopark' at Benedict Wharf comprising a modern and efficient MRF and an Anaerobic Digestion (AD) facility for the generation of electricity and processing of degradable waste into commercial compost/ soil enhancer, plus ancillary facilities. The proposal included a comprehensive redevelopment of the site including landscaping and environmental improvement works.

Planning permission was granted in 2012 following a call in by the Mayor of London and the permission was implemented in 2015. However, it has not proven to be economically viable to fully develop the permission due to a range of constraints associated with both the nature of the direct surroundings of the site and controls/ conditions, which the eco-park permission was subject to, for example:

- Operation of the site was restricted to between 07:00 and 23:00;
- Vehicle movements associated with the development were only permitted between 07:00 and 17:00 Monday – Friday, 07:00 and 12:00 on Saturday and no vehicle movements on Sundays or bank holidays.
- SUEZ to minimise the overall number of bulk haulage vehicle movements to be undertaken during peak school run periods - 08:30 – 09:15 and 14:45 – 15:45.
- SUEZ collection vehicles and bulk haulage vehicles contracted to SUEZ to generally seek to avoid the eastern section of Church Road where practical during all other time periods.
- Compulsory arrival and departure of third party articulated vehicles from the western side of Church Road (right turn in, left turn out).

Benedict Wharf continues to operate under the variety of historical planning permissions granted in the 1980's/90's/00's. However, as the site is so constrained, SUEZ took the decision to purchase a new site on Beddington Lane within the London Borough of Sutton (LBS). The site is known as BLRRF (Site S12 within the draft SLWP) and has recently been granted planning permission (ref: DM2018/01865) for an integrated Resource Recovery Facility with an overall processing capacity of up to 350,000 tonnes per annum (TPA) and benefits from flexible operating hours, as expected within a SIL.

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| | | <p>As set out within section 6.3.2 of SLWTP, BLRRF would provide compensatory capacity for the existing operations at Benedict Wharf. BLRRF will only be constructed if Benedict Wharf can be redeveloped. As highlighted within the SLWTP, should this proceed, there could be a maximum net increase of capacity for apportioned waste of around 200,000 TPA in South London that supports the overall strategy of the plan to intensify existing facilities and not identify new sites. Furthermore, there will be significant benefits associated with the redevelopment of Benedict Wharf.</p> <p>SUEZ, therefore, strongly supports the strategy for safeguarding BLRRF and no longer safeguarding Benedict Wharf.</p> <p>As previously noted, SUEZ is the freehold owner of this site which has recently been granted planning permission (ref: DM2018/01865) for an integrated Resource Recovery Facility with an overall processing capacity of up to 350,000 TPA. SUEZ, therefore, strongly supports the safeguarding of this site.</p> <p>As set out within section 6.3.2 of SLWTP, BLRRF would provide compensatory capacity for the existing operations at Benedict Wharf. BLRRF will only be constructed if Benedict Wharf can be redeveloped. As highlighted within the SLWTP, should this proceed, there could be a maximum net increase of capacity for apportioned waste of around 200,000 TPA in South London that supports the overall strategy within SLWP. Furthermore, there will be significant benefits associated with the redevelopment of Benedict Wharf.</p> | |
| 1138 | Resident MS of Sutton (C28) | This site should be safeguarded | Support welcomed. |
| 1139 | Resident LP of Sutton (C30) | This site should not be safeguarded | Noted. |
| 1140 | Resident JS of Sutton (C32) | This site should be safeguarded | Support welcomed. |
| 1141 | Resident K of Sutton (C33) | This site should be safeguarded | Support welcomed. |

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| 1142 | Resident SB of Sutton (C35) | This site should not be safeguarded | Noted. |
| 1143 | Resident A of Sutton (C36) | This site should be safeguarded | Support welcomed. |
| 1144 | Resident LF of Sutton (C43) | This site should not be safeguarded | Noted. |
| 1145 | Resident SM of Sutton (C46) | This site should be safeguarded | Support welcomed. |
| 1146 | Sutton Independent Residents/Cllr Tim Foster (C50) | This site should not be safeguarded | Noted. |
| 1147 | Resident S of Sutton (C51) | This site should not be safeguarded | Noted. |
| 1148 | Resident LS of Sutton (C53) | This site should be safeguarded | Support welcomed. |
| 1149 | Resident JK of Sutton (C56) | This site should be safeguarded | Support welcomed. |
| 1150 | Resident CC of Sutton (C59) | This site should not be safeguarded | Noted. |
| 1151 | Resident MR of Sutton (C65) | This site should not be safeguarded | Noted. |
| 1152 | Resident Anonymous of Sutton (C67) | This site should not be safeguarded | Noted. |

| No Comment | | | |
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| 1153 | Natural England (C2) | Natural England have no comments to make on this consultation. | Noted. |
| 1154 | Highways Agency (C4) | Having examined the Issues and Preferred Options Document for the South London Waste Plan documents, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109). Based on this, Highways England does not offer any comments on the consultation at this time. | Noted. |
| Comments on the supporting Technical Report | | | |
| 1155 | Viridor (C22) | <p>In respect of the Beddington Recycling Centre part of the site, Paragraph 6.2.4.1 recognises that its proximity to the Viridor ERF makes it a site suitable for a complementary facility. Unfortunately, due to some of the existing designations in place for the site it has not been considered further.</p> <p>However, parts of this site, and other parts of the site housing infrastructure, should still be considered for accommodating waste infrastructure to address those times that the ERF is not operational. In addition, such areas should also be considered for supporting uses which may be required in association with the restored landfill. The potential uses are summarised below:</p> <ul style="list-style-type: none"> - Hard standing area for use for set down, welfare and parking associated with ERF maintenance periods. - Use of area for receipt and bulking of waste to be sent to alternative treatment facility. - Hard standing area associated with landfill restoration maintenance and management. <p>This Recycling Centre site should not therefore be dismissed, but carefully considered on the context of the ERF and its needs. It is adjacent to the ERF operation and it is recognised on page 169 that the site is distant from residential areas. In addition, it has operated for a number of years without complaints and the retention of all or part of the Recycling Centre at the site would mean</p> | <p>Noted. However, the Councils have reviewed the Beddington Farmlands Restoration Plan and noticed the current proposed safeguarded site includes some of the Wandle Valley Regional Park. Therefore, the Councils will be redrawing the safeguarded site boundary for the Submission draft to align with the extent of the Wandle Valley Regional Park.</p> |

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| | <p>sustainable use of existing infrastructure.</p> <p>In addition, the Recycling Centre provides a facility to the SLWP, under contract until 2022, to receive bulky goods and recyclables collected from within the area. This facility should be safeguarded until a procurement process by the SLWP has been concluded, and an alternative site for receiving and processing this waste stream from the SLWP has been delivered.</p> <p>Page 171 indicates that the Recycling Centre is to be restored to a country park. This is incorrect. The site is privately owned and is required to be restored in accordance with an approved Restoration Management Plan, which includes public access to parts of the site. It is misleading to refer to the entire site as a country park.</p> | |
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Data Protection Impact Assessment (DPIA)

Appendix 4

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| Project Name: | South London Waste Plan |
| Project Manager or Sponsor (PM): | Duncan Clarke (Sutton Council) |
| Name of person completing the DPIA if different to (PM): | Dominick Mennie |
| Service Team and Department: | Spatial Planning, Place |
| Relevant Director and Executive Director: | Heather Cheesbrough Shifa Mustafa |
| Information Management Champion(s) for service area: | |
| Date DPIA received by the IMT: | |
| Date approved by DPO: | |
| Date approved by IMT : | |

1 Project Scope

Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation)

The South London Waste Plan is part of the statutory development plan for Croydon under the Planning and Compulsory Purchase Act 2004. It is being prepared by Sutton Council on behalf of Croydon Council, Kingston Council and Merton Council.

Croydon Council will not manage or maintain any data. All data will be processed by Sutton Council on behalf of the four boroughs.

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

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| <p>Whose information is being used?</p> <ul style="list-style-type: none"> - Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person | <p>Anyone who comments in writing to the South London Waste Plan at the Proposed Submission publication of the plan stage (regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.</p> <p>All data will be managed and maintained by Sutton Council. Croydon Council will forward all information to Sutton Council.</p> |
| <p>What information is being used?</p> <ul style="list-style-type: none"> - Consider the nature of this information E.g. Child's social care file | <p>n/a – Sutton Council are the data managers</p> |
| <p>Does it include special category or criminal offence data?</p> | <p>If any representations made to the Council contains 'sensitive data' (which includes racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; or health, sex life and/or sexual orientation) then these will be forwarded directly to Sutton Council as the data managers.</p> |
| <p>Can an individual be identified easily from the information?</p> | <p>Yes they will give their name, and their postal and/or e-mail address, all of which will be forwarded to Sutton Council.</p> |
| <p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> - What are the risks/ impact to an individual if this information was lost, stolen or manipulated? - E.g. could it be sold? | <p>n/a – Sutton Council are the data managers</p> |
| <p>Will this change the manner in which we handle, use or protect this information? e.g. should it be encrypted?</p> | <p>n/a – Sutton Council are the data managers</p> |

3 Consultation process

Consider how to consult with relevant stakeholders.

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| When did you consult individuals? | The South London Waste Plan will be published in order for interested persons to make comment on it. All comments are considered by the Planning Inspector appointed by the Secretary of State, and not Croydon Council. As such it is not a consultation. |
| How did you consult individuals? | They will be able to submit comments in a number of ways including email and letter. |
| If not explain why it is not appropriate. | |
| Who else within the organisation have you consulted with? | None |
| Do you need to speak with your processor to assist? | No |
| Do you plan to consult information security experts or any other experts? | No |

4 Assessment of necessity and proportionality of data usage

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| What is your lawful basis for processing? | It is a requirement of Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012 |
| Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent? | n/a – Sutton Council are the data managers |
| Does the processing actually achieve your purpose? | n/a – Sutton Council are the data managers |
| How will the information be collected? Verbally, forms, intranet, interview, 3 rd party, anonymous) | n/a – Sutton Council are the data managers |
| Is there another way to achieve the same outcome? | n/a – Sutton Council are the data managers |
| How will the information be used? <i>e.g. to write a report</i> | Data may be used to contact persons about the Examination in Public to enable them to participate and submit further representations if requested to so by the Planning Inspector appointed by the Secretary of State. |
| Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended? | n/a – Sutton Council are the data managers |
| How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i> | n/a – Sutton Council are the data managers |
| How will you ensure data quality and data minimisation? | n/a – Sutton Council are the data managers |
| Who will have access to the information within LBC? - <i>Include approximate number of users</i> | n/a – Sutton Council are the data managers |
| Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i> | n/a – Sutton Council are the data managers |
| Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i> | n/a – Sutton Council are the data managers |
| What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i> | n/a – Sutton Council are the data managers |

| | |
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| How will the information be updated? <i>e.g. monthly check</i> | n/a – Sutton Council are the data managers |
| Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers? | No |
| How will you prevent function creep? | n/a – Sutton Council are the data managers |

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

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| Who will be responsible for the control for this information? | Duncan Clarke, Sutton Council |
| How will the access to this information be controlled? | n/a – Sutton Council are the data managers |
| Is the data correctly managed to reduce the risk of collateral intrusion to the data subject? | n/a – Sutton Council are the data managers |
| Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i> | n/a – Sutton Council are the data managers |

5b Sharing

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| Who is the information shared with, why are we sharing the information with this organisation? | n/a – Sutton Council are the data managers. |
| What purpose does the information we are sharing have to the third party? - <i>Ensure that we only share relevant information and not excessively</i> | n/a – Sutton Council are the data managers |
| Who will have access to the information, externally? - <i>Include approximate number of users</i> - <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i> | n/a – Sutton Council are the data managers |
| How will it be transmitted to third parties and when? How often? | n/a – Sutton Council are the data managers |
| Is there a data sharing agreement in place? | n/a – Sutton Council are the data managers |

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| At what stage will the information be transferred? | n/a – Sutton Council are the data managers |
|--|--|

5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

| Risk Identified | Severity of Impact | Likelihood of harm | Overall RAG rating |
|-----------------|--------------------|--------------------|--------------------|
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6 Identify measures put in place to reduce risk.

You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

| Risk Identified | Options to reduce or eliminate risk | Effect on risk | Residual risk | Measure approved |
|-----------------|-------------------------------------|---------------------------------|---------------------|------------------|
| | | Eliminated / reduced / accepted | Low / medium / high | Yes / No |

Sign off and Record sheet

| Item | Name/date | Notes |
|--|-----------|---|
| Measures approved by: Residual risks approved by: | | Integrate actions back into project plan, with date and responsibility for completion. If accepting any residual high risk must consult ICO before going ahead. |
| DPO advice provided: | | Summary of DPO advice: <i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i> |
| Consultation responses reviewed by: | | If your decision departs from individuals views you must explain your reasons. |
| DPIA to be keep under review by: | | |

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk

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For General Release

| | |
|--|---|
| REPORT TO: | CABINET 8 JUNE 2020 |
| SUBJECT: | Equality Annual Report |
| LEAD OFFICER: | Jo Negrini, Chief Executive and Head of Paid Service Jacqueline Harris Baker Executive Director of Resources |
| CABINET MEMBER: | Councillor Hamida Ali Cabinet Member for Safer Croydon & Communities |
| WARDS: | All |
| <p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: <i>Include here a brief statement on how the recommendations address one or more of the Council's Corporate Plan priorities:</i> <i>The recommendations of this report address the Corporate Plan for Croydon 2018-2022 outcome to abolish inequality in Croydon and work towards a place where all have equal opportunity to prosper</i></p> | |
| <p>FINANCIAL IMPACT: There are no additional costs, savings or efficiencies associated with this report.</p> | |
| <p>KEY DECISION REFERENCE NO.: This is not a key decision</p> | |
| <p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:</p> <p>1. RECOMMENDATIONS</p> <p>1.1 Note the Equality and Inclusion Annual Report for 2019</p> <p>1.2 Note the Equality Framework for Local Government (EFLG) Report 2019</p> <p>1.3 Note the Stonewall Workplace Equality Index (WEI) Report 2019</p> <p>1.4 Note the reports will be published on the Council's website</p> <p>1.5 Note the work to develop an Equality Strategy</p> | |

2. EXECUTIVE SUMMARY

Equality and Inclusion Annual Report 2019

- 2.1 The Equality and Inclusion Annual Report 2019 provides an update on the progress made in implementing the statutory equality and inclusion priorities as set out in the Equality and Inclusion Policy 2016-20 agreed by Cabinet in April 2016 during the financial year 2018/19.

2.2 The Equality and Inclusion Annual Report 2019 supports the Council to demonstrate compliance with the Public Sector Equality Duty (PSED) set out in the Equality Act 2010. The PSED is made up of a general equality duty which is supported by specific duties.

The **specific duty** requires the council to:

- Annually publish information to demonstrate how it is complying with the Public Sector Equality Duty. This information must relate to people who are affected by the Councils policies and practices such as service users and employees
- Prepare and publish equality objectives at least every four years.

2.3 The Equality and Inclusion Annual Report 2019 is structured around the Council's current equality objectives:

- To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.
- To reduce the rate of child poverty especially in the six most deprived wards.
- To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked after Children, particularly at Key Stage 2 including those living in six most deprived wards.
- To increase the percentage of domestic violence sanctions.
- To increase the reporting and detection of the child sexual offences monitored.
- To reduce the number of young people who enter the youth justice system.
- To reduce social isolation amongst disabled people and older people.
- To improve the proportion of people from different backgrounds who get on well.
- To reduce differences in life expectancy between communities.

Each section of the report sets out the current equality and inclusion policy priorities (listed above 2.3) and a summary of the key activities and projects that the Council has focused on over the last year to deliver them.

It also contains examples of best practice - to provide an overview of how the Council has worked in partnership with our statutory, voluntary and community partners and engaged with our customers to deliver equality initiatives that support work on improving service outcomes for diverse communities in the borough.

2.4 The Council used the Opportunity and Fairness Commission's (OFC) final report recommendations and information on issues of deprivation and disadvantage that are highlighted in the Indices of Multiple Deprivation (2015) to set its statutory equality and objectives for 2016-20. These defined the boroughs longer term vision for fairness and set out the outcomes and performance measures that the Council focused on to address inequality.

Equality Framework for Local Government: Equality Peer Challenge

- 2.5 In November 2019, the Council asked the Local Government Association to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government (EFLG).

The process helped the Council to understand current activity around equality and evidence how those activities are helping us to further equality and inclusion outcomes as measured against the Achieving criteria.

- 2.6 The Council satisfied the criteria for the **Achieving** level of the EFLG, the level we agreed to be assessed. This assumes that we have key equalities policies and procedures and set up systems, to monitor delivery. The ‘Achieving’ level focuses on how well we implement these systems, policies and procedures in our practice.

The Local Government Association (LGA) made a number of recommendations to improve equality outcomes based upon the findings during the 3 day visit. These are summarised below:

Knowing Your Communities – Recommendations

- Ensure that any new systems capture all the protected characteristic data of service users and the community.
- Enable data teams to share equalities data with service teams so that there is a greater focus on equality impact and need in these discussions.
- Consider how to provide all staff with the skills and confidence to collect and interpret protected characteristic data and understand the importance of that data.

Involving Your Communities – Recommendations

- Ensure all consultations have an Equality Impact Assessment and communities and service users are informed of the outcomes of consultations.
- Develop links with smaller communities in the borough to provide better understanding of their needs when developing services.
- Develop some criteria for what community budgets should be spent on to ensure that projects are contributing to the Council’s own strategies and meeting the most need in the borough.

Responsive Services and Customer Care – Recommendations

- Increase the focus on the equality outcomes of service delivery. Services should not lose sight of the outcomes and the difference that is actually being made.
- Consider auditing access to services across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require. This would include the south of the borough.
- Enhance opportunities for greater communication between staff in different departments. This would allow for more sharing of and access to information, (within the boundaries of GDPR) to improve the customer experience.

Leadership, Partnership and Organisational Commitment – Recommendations

- Consider establishing a service level steering group (constituted with Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans.
- Review the level of resourcing for the corporate equality function to provide some support for the one equality officer. Increased organisational capacity would also help to improve EIA monitoring within services.
- Strengthen scrutiny on equality more generally by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives.
- Consider how the council can assess outcomes for contracts in excess of £100,000 using equality metrics as well as contract monitoring in relation to collecting equality information and providing equality training for staff. There is a need for consistency across the organisation and support to ensure this is happening.

A skilled and committed workforce – Recommendations

- Undertake further investigation into the reasons why black male employees are still not progressing in the organisation at the same rate as their female counterparts and why BAME staff are over represented in the lowest quadrants of the appraisal results.
- Address the inconsistencies in the way HR policies such as sickness, lateness, training opportunities, performance management and reasonable adjustments are being applied by some managers across the organisation.
- Consider ways to increase staff awareness of the council's equality objectives

The Council has accepted these recommendations and it is proposed that actions to address the recommendations will be incorporated in the upcoming Equality Strategy and underpinning action plan. This will help the Council move from 'Achieving' towards 'Excellence' at reaccreditation in 3 - 4 years.

The full report highlights the below and has been included in *appendix 2*

- examples of notable or innovative practices
- significant areas of concern
- suggested action points based upon the findings
- proposals for additional support and/or links to other LGA projects and programmes that may be of assistance

Stonewall 2019/20 Workplace Equality Index

- 2.7 Croydon Council has been a Stonewall Diversity Champion since 2014. In September 2019, Croydon participated in the Stonewall Workplace Equality Index. This process assesses the Council's progress on lesbian, gay, bi and trans inclusion in the workplace.
- 2.8 Croydon ranked 148th in 2019/20 out of over 500 organisations that took part. The Council were ranked in fifteenth place in the local government sector

It is proposed that the feedback from the Stonewall Index 2019/20 be addressed as part of a new Equality Strategy and underpinning action plan that is currently being developed. This will help the Council move towards becoming one of the top 100 best employers for LGBT people, and support ongoing work towards the aspiration of an 'Excellent' rating for the Equality Peer challenge.

The full report has been included in *appendix 3*

Equality Strategy 2020 – 2024

- 2.9 Under the Equality Act 2010 (Specific Duties) Regulations 2011, councils employing more than 150 people will have to produce "equality objectives" at least once every four years. Our current equality objectives come to an end this year.
- 2.10 The Council is undertaking a process of developing an Equality Strategy and accompanying action plan for 2020-2024. The Strategy will set out the Council's vision to abolish inequality in Croydon and work towards a place where all have an equal opportunity to prosper as set out in its Corporate Plan 2018 -2022.
- 2.11 Part of this process will also consist of developing refreshed equality objectives which will help the Council meet its requirements under the Equality Act 2010.
- 2.12 The overall process of developing the strategy will consist of the below:
- **Refreshed equality objectives**
The Council with stakeholder input will develop a new set of equality objectives. This will consist of reviewing our existing objectives, examining existing national and local data to ensure the process is data and intelligence led, examining the health and socio-economic inequalities resulting from the current pandemic (see below) and consulting with a range of internal and external stakeholders to help us identify where our priorities should lie.

Examining impact of Covid-19 on equality and groups that share a protected characteristic

The impact of the coronavirus is far reaching. The pandemic has exposed and amplified current underlying inequalities in society and made us aware of new dimensions. This will have a combined and unprecedented impact on the local economy, both on businesses and the workforce and some parts of our communities who will be disproportionately impacted for the short, medium and long term.

The Council has been acutely aware of the disproportionate impact that the virus and lock down will have on particular demographics, such as older residents and those with pre-existing health conditions.

The lock down has already had a disproportionate impact on certain population groups. In addition to residents that were already struggling for a variety of reasons (health, financial, housing), other groups became vulnerable (or more vulnerable). These include shielded residents, furloughed workers, keyworkers and those who are homeless.

There has been emerging data to suggest that BAME residents are disproportionately affected by Covid-19. The government has launched a review, led by the NHS and Public Health England

We will need to examine the health, socio-economic and new dimensions of inequalities. This will include examining qualitative and quantitative data looking

at how different groups in the Borough have been affected by this period and work towards reducing these inequalities.

- **Equality Action Plan**

The action plan will be based on the below;

- LGA recommendations on our Equality Framework for Local Government (EFLG) peer challenge
- Stonewall Workplace Equality Index Recommendations
- recommendations from the Women and Equalities Committee inquiry into the different and disproportionate impact that the Coronavirus is having on people with protected characteristics
- recommendations from the government review into disproportionate impact on BAME communities
- key actions the Council will take to meet its equality objectives.

- **Consultation**

It is proposed that the Council will consult on the current equality objectives with the view to find out what internal and external stakeholders views about them and give them the opportunity to inform us about what they feel is missing. We will use this feedback to develop draft equality objectives and follow this with a formal consultation with internal and external stakeholders where we will seek their views on the emerging refreshed objectives and test out the final objectives with them. Objectives will also be further tested against data from the Croydon Observatory, services and localities.

The Council has already started working on reviewing our current equality objectives and taking feedback from the equality peer challenge, Stonewall Recommendations, impact of Covid-19 and initial discussions with some Members and senior management into account.

Some emerging issues that the Council will focus on are listed below;

- Reducing poverty and deprivation and its impact on vulnerable and protected groups
- Reducing health and socio-economic inequalities
- Jobs, the economy and opportunity
- Supporting vulnerable groups and households
- Strengthening and building our evidence base/equality information in order to gain holistic picture
- Equality information and services that are tailored to people's needs
- Building a cohesive and inclusive Borough
- Improving workforce equality, diversity and inclusion

Implementing the strategy – Key Milestones /High Level Plan

| | |
|----------------------------|---|
| Q4 2019/20 | Establish project team |
| | Propose structure and governance |
| | Agree equalities approach |
| | Stakeholder mapping |
| Q1 2020/21 | Agree governance structure |
| | Partner, resident and VCS engagement begins |
| | Staff consultation begins |
| | Resident and partner consultation begins |
| | Locality data gathering begins |
| | Locality data gathering completed |
| | Service data analysis begins |
| Service data analysis ends | |
| Q2 2020/21 | Consultation outcome & feedback |
| | Equality objectives and measures tested with Members, residents, partners, VCS and colleagues |
| | Draft Strategy created |
| Q3 2020/21 | Strategy adopted |

3. BACKGROUND

3.1 The Equality Act 2010 (the Act), contains the Public Sector Equality Duty (PSED) in section 149 of the Act that came into force on 5 April 2011. The duty applies to public bodies and others carrying out public functions.

The general equality duty requires the Council, in the exercise of functions, to have “due regard” to the need to:

- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
- Foster good relations between people who share a relevant protected characteristic and those who do not share
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.

3.2 The Act and PSED support good decision-making by ensuring public bodies consider how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective; accessible to all; and which meet different people’s needs.

3.3 The Council is also required to publish information to demonstrate their compliance with the general equality duty.

3.4 This information must relate to people who are:

- The Council's employees
- Affected by its policies and practices (for example, service users).

3.5 The Council, like most public sector organisations, publishes an annual report setting out the progress it makes implementing the equality objectives and its arrangements for publishing information. At **appendix 1** is the Council's Equality and Inclusion Annual Report 2019.

3.6 The information included in this report is drawn from a range of sources from across the Council.

3.7 It has also involved identifying activities that demonstrate good practice on equality and working with activity leads to gather more detailed information on how these initiatives have delivered positive outcomes for local people, particularly those that are most vulnerable and may experience exclusion.

This information has been used to produce some best practice stories that describe the positive impact of some of the equality and inclusion initiatives the Council implemented during the year.

3.8 **Equality Framework for Local Government: Equality Peer Challenge**

The ELFG is a national benchmarking and assessment tool that helps local authorities to identify what they do well and where they can make improvements to, and deliver better equality outcomes for staff, residents and service users.

In November 2019, the Council asked the Local Government Association to conduct an Equality Peer Challenge against the "Achieving" level of the Equality Framework for Local Government (EFLG). It undertook a self-assessment against five performance criteria.

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

The Council satisfied the criteria for the Achieving level of the EFLG, the level we agreed to be assessed. The Local Government Association (LGA) made a number of recommendations to improve equality outcomes based upon the findings during the 3 day visit.

The full report has been included in appendix 2.

3.9 **Stonewall 2019/20 Workplace Equality Index**

Croydon Council has been a Stonewall Diversity Champion since 2014. In September 2019, Croydon participated in the Stonewall Workplace Equality Index. This process assesses the Council's progress on lesbian, gay, bi and trans inclusion in the workplace.

The process allowed the Council to demonstrate its work in the following ten areas of employment policy and practice:

- Policies and benefits
- The employee lifecycle
- LGBT employee network group
- Allies and role models
- Senior leadership
- Monitoring
- Procurement
- Community engagement
- Clients, customers and service users
- Additional work

Croydon was ranked 148 out of over 500 organisations that took part. Stonewall made a number of recommendations to improve inclusion for lesbian, gay, bi and trans employees in the workplace.

The full report has been included in *appendix 3*

3.10 **Disability Confident Employer**

The Council is a Disability Confident Employer (Level 2). To achieve this level, the Council carried out a self-assessment, against a set of statements about employing disabled people. The self-assessment is grouped into 2 themes:

- Theme 1 – getting the right people for your business
- Theme 2 – keeping and developing your people

The Disability Confident scheme supports employers to make the most of the talents disabled people can bring to the workplace.

The scheme helps employers recruit and retain great people, and:

- draw from the widest possible pool of talent
- secure high quality staff who are skilled, loyal and hard working
- improve employee morale and commitment by demonstrating that you treat all employees fairly

It also helps customers and other businesses identify those employers who are committed to equality in the workplace.

3.11 **Timewise Council**

Croydon Council is also Timewise accredited. This means it is driving transformational change through flexible working practices. In practice, as an employer it embeds flexibility into its wider improvement plans, fostering a culture of learning and continual improvement that aligns the benefits to its employees with improvements in workplace efficiency.

3.12 Equality Strategy 2020 – 2024

The Council is required to be transparent about how it responds to the Equality Duty, as required by the Equality Act 2010 (Specific Duties) Regulations 2011. This stipulates that councils employing more than 150 people will have to produce "equality objectives" at least once every four years. Our current equality objectives come to an end this year.

The Council is undertaking a process of developing an Equality Strategy and accompanying action plan for 2020-2024. The Strategy will set out the Council's vision to abolish inequality in Croydon and work towards a place where all have an equal opportunity to prosper as set out in its Corporate Plan 2018 -2022.

The overall process of developing the strategy will consist of the below:

- Examining impact of Covid-19 on equality and groups that share a protected characteristic
- Developing refreshed equality objectives
- Developing an Equality Action Plan

4. CONSULTATION

- 4.1 The information included in the annual report is drawn from a range of sources from across the Council.

It has also involved identifying activities that demonstrate best practice on equality and working with activity leads to gather more detailed information on how these initiatives have delivered positive outcomes for local people, particularly those that are most vulnerable and may experience exclusion

5 PRE-DECISION SCRUTINY

- 5.1 The report is due to go to a future Scrutiny meeting as part of the consultation process for a pre-decision debate. Any relevant information on the outcome of the discussion will be incorporated in the Equality Strategy report due to go to cabinet in the Autumn.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 The Council's Equality and Inclusion Annual Report 2019 incorporates the council's public sector equality duties as well as the national equality service improvement framework. It demonstrates the Council's compliance with the current legal framework. There are no direct financial implications arising from this report.

Failure to implement and annually report on the Council's Equality and Inclusion priorities and actions will expose the Council to risk of claims for breach of statutory duty. Failing to implement actions identified in the equality analysis conducted to support decision-making or compliance with the public sector

equality duties will also expose the Council to risk.

The Equality and Inclusion Annual Report is published in an electronic format and does not incur a publication cost to the Council.

Publication of the Equality and inclusion Annual Report will incur production costs. The Annual report must be accessible and therefore made available in different formats, in summary and electronically - on the Council's website and intranet. Provision for this is available from existing budgets available to the Resources Department.

6.1 Revenue and Capital consequences of report recommendations

The cost of producing the Equality and Inclusion Annual Report 2019 is found from existing budgets.

6.2 The effect of the decision

The approval of the Equality and Inclusion Annual Report will have no effect on the current financial situation. Action has been delivered in accordance with the risk management process.

6.3 Risks

The approval of the Equality and Inclusion Annual Report will have no effect on the current financial situation.

6.4 Future savings/efficiencies

There are no savings or efficiencies associated with the approval of this report.

Approved by Ian Geary, Head of Finance, Resources & Accountancy

7 LEGAL CONSIDERATIONS

7.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the Equality Act 2010 (Specific Duties) Regulations 2011 sets out that the Council must publish information to demonstrate its compliance with the duty imposed by section 149(1) of the Equality Act 2010, not later than 31st January 2012; and subsequently at intervals of not greater than one year beginning with the date of last publication. The information which the Council publishes must include, in particular, information relating to persons who share a relevant protected characteristic who are—

- (a) its employees;
- (b) other persons affected by its policies and practices.

7.2 Section 149(1) (a) to (c) sets out the public sector equality duty with which the Council is required to comply. A public authority must, in the exercise of its functions, have due regard to the need to—

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

- 7.3 In addition, the Council is required to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of subsection (1) of section 149 of the Act referenced above.
- 7.4 The objectives must be published—not later than 6th April 2012; and subsequently at intervals of not greater than four years beginning with the date of last publication.
- 7.5 An objective published by a public authority in compliance with paragraph (1) must be specific and measurable and must be published in such a manner that the information is accessible to the public.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance and Deputy Monitoring Officer

8. HUMAN RESOURCES IMPACT

- 8.1 Equality is integral to our workforce processes, policies and practices, including becoming an employer of choice. We continue to make positive progress towards having a workforce that reflects its community and where inclusivity is embedded in our practice, though it is recognised that there is more to do.

Approved by: Sue Moorman, Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 Consultation was carried out when drafting the Equality and Inclusion Policy. Please see Cabinet Reports, 25 April 2016, Item A44/16 for further details.

The Opportunity and Fairness Plan 2016-2020 aims to make Croydon ‘a stronger, fairer borough where no community is held back.

The Opportunity and Fairness Plan sets out the Council’s Equality objectives 2016-2020. This information is from the Borough Profile, Index of Multiple Deprivation, as well as the views of 3000 people including staff, residents, local businesses, community and voluntary organisations all of whom contributed to the Opportunity and Fairness Commission’s final report published in January 2016.

The work of the Opportunity and Fairness Commission is essentially an extensive analysis of equality and inclusion issues in the borough.

- 9.2 Further information about thematic inequalities will be found in borough-wide documents such as the annual health report, crime analysis or workforce profile that can be accessed through that can be accessed through <http://www.croydonobservatory.org/>

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

10.1 There will be no environmental impact arising out of the issues raised in this report

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 The proposed change will help the Council work towards building a cohesive and inclusive Borough

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

12.1 To support the Council to demonstrate its transparency and fairness in its operations as well as compliance with its public sector equality general duty and specific duties as defined by the Equality Act 2010.

13. OPTIONS CONSIDERED AND REJECTED

13.1 None

14. DATA PROTECTION IMPLICATIONS

14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

The Director of Policy and Partnerships comments that there will be no data protection implications arising out of this report

Approved by: Gavin Handford, Director of Policy and Partnerships

CONTACT OFFICER:

Yvonne Okiyo, Equalities Manager

APPENDICES TO THIS REPORT:

Appendix 1 – Equality Annual Report
Appendix 2 – Equality Framework for Local Government Report
Appendix 3 – Stonewall Workplace Equality Index Report

BACKGROUND PAPERS:

None

CROYDON COUNCIL

EQUALITY ANNUAL REPORT 2019

“Ensuring growth that benefits all in the Borough, and improving equality of, and access to, opportunity”

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Foreword – Cabinet Member for Safer Croydon and Communities

As the portfolio holder for the Safer Croydon and Communities agenda, I am pleased to introduce the progress report on the Council's Opportunity and Fairness Plan 2016-2020, which sets out the Council's equality objectives and latest analysis and action on the Council's workforce profile and gender pay gap.

Croydon has equality and diversity set at the very heart of our Borough. We are very proud of our Borough, its diverse mix of people and places that makes it a great place to live and work.

Equality and inclusion is integral to everything we do as a Council, whether it is the services we provide, the money we spend, or the people we employ. It is a fundamental tenet of our pledge to achieve the highest standards of excellence in equality and inclusion practice, working closely with our partners in the public, business, and voluntary sectors.

This administration wants Croydon to be a stronger, fairer Borough where no community is held back. We want the Council to reflect the diversity of the Borough, and focus on embedding equality and inclusion in all that we do, as well as providing community leadership to encourage and support our partners in Croydon to share this ambition.

Croydon's Corporate Plan 2018-2022 outlines the Borough's key priorities for the next four years, and how we will continue to eradicate inequalities, ensuring that Croydon is a place where all have the opportunity to live, work and flourish. One of the Corporate Plans outcomes is to abolish inequality in Croydon, and work towards a place where all have an equal opportunity to prosper.

This progress report provides a detailed insight into our ongoing commitment to equality. It highlights our achievements in relation to our equalities performance indicators, and sets out examples through a series of case studies that describe the different ways the council is seeking to ensure that our services are fair, inclusive and accessible to our residents. The majority of the case studies support achievements across the range of the equality objectives we set for 2016/20.

Although many challenges remain locally and nationally to achieve our ambitions there have been significant achievements including:

- Completed a satisfactory self-assessment against the criteria for the Achieving level of the Local Government Association, Equality Framework for Local Government (EFLG) accreditation
- Being recognised as being the 2nd best Borough (out of 33 London Boroughs) for leading the way in tackling food poverty
- Stonewall Workplace Equality Index: 2019 marked our highest placing for Stonewall. The Council ranked in ninth place in the local government sector, and was in the top 23% of all 455 companies that took part.
- Award for 'Innovation' in recognition of the ground-breaking work of the Menopause Steering Group (a subgroup of the Women's Staff Network) at the REBA (Reward and Employee Benefits Association) Health and Wellbeing Awards

- Highly Commended in the Representative Workforce category at the Employers Network for Equality and Inclusion (ENEI)
- Established the Croydon Apprenticeship Academy and Run the 100 Apprenticeships in 100 Days Campaign with well over 100 apprenticeships filled
- Expanded the award winning One Croydon Alliance to cover the whole population
- Launched the Work and Health Programme to support people who are long-term unemployed (2+ years), have a health condition or disability into sustained employment.
- Established a Violence Reduction Network
- Established Community Led Support and social prescribing
- Worked in partnership with schools to challenge underachievement and support improvement
- Increased investment in Community Ward Budgets
- Developed an anti-hate crime action plan with partners and launched an anti - hate crime pledge
- Celebrated Croydon's diversity and heritage through supporting annual events such as Croydon Mela, PrideFest and Holocaust Memorial Day

The performance in key areas and good practice stories provide evidence that we have made progress in our journey towards achieving excellence for our equality and inclusion practices.

Over the year, the Council prepared for the Equalities Framework for Local Government (EFLG) accreditation. Undertaking the assessment helped us review and identify what we do really well, and where we need to make improvements to deliver better equality outcomes for staff and service users.

Following the Equality Peer Challenge, the Local Government Association (LGA) reached the conclusion that the Council had completed a satisfactory self-assessment against the criteria for the Achieving level of the Equality Framework. This is a great outcome for the Council.

Our progress has also been recognised through the Council winning the Reward & Employee Benefits Association (REBA) award for Innovation for its Menopause Matters initiative, and was highly commended for Representative Workforce category at the Employers Network for Equality and Inclusion (ENEI) in 2019.

We are not complacent, and recognise that there are still many equality and fairness challenges in the Borough that we need to focus on by working in collaboration with our partners.

Over the next year, we will be taking forward the EFLG recommendations and developing an Equality Strategy and develop refreshed equality objectives for the Borough.

I look forward to sharing the improvements that we make in 2020/21 with you in our next progress report.

Introduction

The Equality Policy and supporting Opportunity and Fairness Plan 2016/20 jointly set out the Council's statutory equality objectives in line with the regulatory duties under the Equality Act 2010.

In setting the equality objectives for 2016/20, an evidence base was drawn upon from the Croydon Opportunity and Fairness Commission final report, the Borough profile 2015 and Index of Multiple deprivation.

The Council's equality objectives based on the Opportunity and Fairness Commission recommendations have been incorporated in the Borough's Corporate Plan 2018-2022 and are monitored via the Corporate Plan Performance Framework on an annual basis.

Each section of the report sets out the current equality and inclusion priorities and a summary of the performance key activities and projects that the Council has focused on over the last year to deliver them.

It also contains good practice stories that provide an overview of how the Council has worked in partnership with our statutory, voluntary and community partners, and engaged with our residents to deliver equality initiatives that support work on improving service outcomes for diverse communities in the Borough.

Next Steps

The Council will undertake the process of developing an Equality Strategy for 2020-2024. The Strategy will set out how the Council intends to meet its requirements under the Equality Act 2010 and associated Public Sector Equality Duty. This will consist of:

Refreshed equality objectives.

- Emerging equality objectives will be consulted on and tested as part of the process of developing the strategy. The objectives will be based on progress on current equality objectives as well as recommendations from the Equality Framework for Local Govt. and Stonewall workplace Equality Index. We will also be taking the health and socio-economic inequalities that have been amplified as a result of the recent pandemic into consideration.

Action Plan.

- The Action Plan will be based on LGA recommendations from the Equality Framework for Local Government and Stonewall Workplace Equality Index Recommendations as well as key actions to address existing and emerging inequalities in the Borough.

The Council will monitor progress against the Equality Objectives through the Council's Corporate Performance Framework and will report bi-annually on overall progress.

THEME 1**EMPLOYMENT****A TOWN CENTRE THAT LIFTS THE WHOLE BOROUGH****EQUALITY OBJECTIVE**

To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.

Why we chose this equality objective?

Despite falling unemployment the Index of Multiple Deprivation (IMD) showed there were still challenges around the proportion of working age population excluded from the labour market, especially those aged 18 – 24, over 50, and those who would like to work but are unable to do so due to sickness, disability and/or caring responsibilities.

Residents told the Opportunity and Fairness Commission (OFC) that they would like to see local employers doing more to recruit disabled people, and those from Black and Minority Ethnic (BAME) backgrounds. The Commission also found that women wanted better support with childcare and caring responsibilities to allow them to access the job market. In addition the Commission highlighted that workers needed to be paid the London Living Wage (LLW).

What has happened?

The percentage of people employed within the Borough and the percentage of 18-24 years not in employment, education and training in the Borough continues to perform better than the rest of London and England. The numbers of Job Seekers Allowance claimants aged between 60-64 years within the Borough continues to reduce in the six most deprived wards. The performance demonstrates the focus on getting people into jobs and the continuing success of the Croydon Works programme.

There are still challenges in relation the level of skills and qualification in the Borough to maximise the opportunities within the job market. Through the Croydon Works programme, the Work and Health Programme and '100 Apprenticeships in 100 Days', the Council continues to focus on ensuring that all Croydon residents have access to good quality employment opportunities whether that is through education, training or support for job readiness.

The key actions that the Council has taken to deliver this outcome include:

- Created the environment for thousands of new job opportunities to be made available for local people.
- Successfully met/exceeded targets for ensuring the employment of people from the following groups; people with disabilities, care leavers, people aged 50+, lone parents, ex-offenders and those considered homeless.
- Successfully met/exceeded targets for lowering the level of NEET and increasing the number of apprenticeships recruited by LBC.

- Launched the Work and Health Programme to support people who are long-term unemployed (2+ years), have a health condition or disability, or who are from a number of identified disadvantaged groups into sustained employment.
- Supported 123 residents into construction jobs on key development sites and more residents into sustainable employment via the Croydon Works service.
- Planning applications have been approved with over £380k to deliver employment and skills outcomes for residents and approximately 120 jobs ring-fenced for local people on developments in Croydon.
- Grown our 'Choose Your Future' campaign to raise young people's aspirations and increase their opportunities.

The following case studies highlight the work supporting this theme:

Work and Health Programme

Better Working Futures – The Work and Health Programme, is an employability support programme which aims to support people who are long-term unemployed (2+ years), have a health condition or disability, or who are from a number of disadvantaged groups into sustained employment. The programme was developed to improve on previous employability programmes which are widely deemed to have failed those furthest from the labour market. Priority groups include individuals with declared disabilities as defined in the Equality Act 2010, refugees, victims of domestic violence and young people in gangs.

The programme is delivered across the five South London Partnership (SLP) Boroughs (Croydon, Merton, Sutton, Richmond and Kingston) by Reed in Partnership. Croydon Council is responsible for managing the contract. The programme aims to meet local priorities, and reflect local needs.

The service is flexible and provides personalised advice, skills training, health support and job search support to eligible residents across the South London Partnership Boroughs. The programme also helps those interested in self-employment, and has specialist self-employment advisors who can help with developing business plans.

Referrals to the provider by Job Centre Plus (JCP) across the South London Partnership (SLP) Boroughs. Reed in Partnership engages with individuals to understand their barriers to employment' including: mental and physical health conditions, educational needs and homelessness, and works with them to devise personal action plans which will address these barriers and move them closer to employment. There is also the option to refer participants to sub-providers who can offer specialist support services. The programme also integrates with local services and local health provision such as public health, housing services, adult social care etc, to ensure participants receive holistic support. The programme equips participants with the tools and knowledge they require to manage their conditions and make lifestyle changes that will improve their wellbeing, support employment and change their lives for the better.

To date, the programme has achieved the following:

- 2,145 referrals;
- 1,245 starts to programme;
- 257 job entries;
- 68 lower learnings outcomes; and
- 19 higher earnings outcomes.

"I am really glad that I have been accessing this service, as it is not only supports me in finding work but also on a more personal level in relation to health issues." Charmaine, a resident who successfully completed programme

Croydon Apprenticeship Academy – “100 Apprenticeships in 100 Days”



The Croydon Apprenticeship Academy was born out of a need to engage Croydon residents furthest away from the job market in apprenticeships, and create awareness of the various career pathways available via the apprenticeship route.

The academy is a partnership of businesses, training providers, external and internal referral partners led by Croydon Council to offer local residents opportunities to develop the relevant industry skills and experience today that will be needed in the future. The project was launched with an ambitious scheme to fill 100 apprenticeships among its partners within 100 working days.

The soft launch of the campaign took place during National Apprenticeship Week. The campaign aimed to raise awareness and promote apprenticeships among key priority groups. Several events were held in the community to raise the profile of the campaign and attract applicants, which in turn raised the profile of apprenticeships across the Borough. During the same month, the Council also held a roadshow and hosted an event during Black History Month targeting young BAME individuals.

The 100 in 100 campaign was a great success, with well over 100 apprenticeships filled. The campaign saw far more applications from people with disabilities, including three residents with Education and Health Care Plans who were shortlisted, two of whom secured employment.

Vacancies are still being advertised off the back of this campaign which shows the viability of the Croydon Apprenticeship Academy and its support for those furthest from the job market.

Through the Council's Levy Transfer offer apprentices who would have otherwise lost out on their apprenticeship due to funding caps were able to have all their training costs covered and remain with their employers. The Council were able to commit to fund 30 such apprenticeships.

Training streams and short courses were identified and developed with our training provider partners, including a catering and hospitality programme with Croydon College and Michelin star chef John Malcolm.

120 people were placed in apprenticeships as a result of the 100 in 100 campaign and more are continuing to be placed as we go forward with the Apprenticeship Academy in 2020. Croydon Council were able to directly recruit a total of 11 apprentices - these included 6 BAME, 5 women, 1 with Special Education Needs and 1 care leaver. The Council have already identified 4 roles to be filled in the first quarter of 2020 which will target care leavers.

“The 100 in 100 scheme and Croydon Council have given me a really good opportunity. I was really just keen to get the experience and training but on top of that I’m also getting a great salary and all the staff benefits of a regular employee.”

Apprentice, Land Based Service Engineer, South Norwood

“I am delighted to have been recruited in the Croydon 100 in 100 campaign. I am basically on the career ladder, and the only way is up from here. I have been well-taken care of and supported throughout my apprenticeship journey. I will 100% recommend young people to consider the apprenticeship route seriously. I am excited to see where it goes from here.”

Victoria - HR Apprentice, Croydon Council

'She Constructs' Programme

The construction industry is suffering from various skills gaps. It is also suffering from a lack of representation of women in the workforce. The Construction Industry Training Board (CITB) "Pathways to Construction" programme is focused on filling these gaps by getting women more involved in construction. In addition to this, the Council is running a project to support the long term unemployed into construction.

The construction industry is not just about working on site and plying trade, it is made up of roles including: quantity surveying, building surveying, project management, site management, architecture and health and safety. As well as full-time positions including apprenticeships are also available.

'She Constructs' is a construction initiative designed for Croydon women. Working in conjunction with some of Croydon's largest construction and development companies Croydon Works will deliver a 4 week programme, aimed at women interested in propelling or forging a career within the construction sector. Included in the programme is employability training - those completing the programme are trained in level one health and safety, networking opportunities for participants and employers, Construction skills Certification Scheme (CSCS) card training and test - which identifies the holder as someone who has had the required training to safely enter and move freely on a construction site, in addition to a guaranteed 2 week work placement. Course attendees will also have the chance to join construction associations that represent workers and offer additional training courses.

The Council has undertaken outreach work with external partners such as: job centre plus, charity organisations and referral partners to gain interest. They have also started an online marketing campaign. Additionally, construction companies with section 106 (s106) agreements (private agreements made between local authorities and developers) have been approached to assist with work placements and job opportunities. This has led to some positive results, for example Henry Construction, the contractor for Brick by Brick who have s106 obligations, offered a resident a work placement which has resulted in her securing a permanent position.

The programme will help create new career paths for residents as well as upskilling those already in employment.

The programme has just completed two cohorts with a total of 15 participants - 4 of whom have completed training, and 3 have secured employment. The programme is on target to support women into gaining new employment and aims to attract more women from diverse backgrounds to the industry.

THEME 2 CHILD POVERTY

LEAVING NO CHILD BEHIND

EQUALITY OBJECTIVE

To reduce the rate of child poverty especially in the six most deprived wards.

Why did we chose this equality objective?

Nationally there has been an upward trend in child poverty over the last three years with the impact of welfare reform and benefit freezes challenging the ability to combat child poverty locally. Families on the margins of poverty are often dependent on in-work and out-of-work benefits. Changes in the benefits system have a significant impact on child poverty rates which can hide the impact of local initiatives.

Child poverty varies significantly across the Borough. Although the overall proportion of children in poverty had fallen, the areas with the highest rates of child poverty had remained the same namely: New Addington, Fieldway, Broad Green, Selhurst and Thornton Heath. Almost four times as many children live in poverty in Fieldway (30%) than Sanderstead (8%).

Welfare reforms have further compounded the situation for many of those who already find it difficult to make ends meet. The Opportunity and Fairness Commission found food banks around the Borough were struggling to cope with the increase in demand from people who were in need. At a time when money was tight, many got into debt and turned to payday loans or hire purchase. Citizen Advice in Croydon told the Commission that after benefits, tax credit and housing issues, debt represented their third biggest case load.

Tackling the socio-economic determinants of health such as: jobs, homes, social cohesion, education and income are key to reducing the inequalities in early years that become the inequalities in health and life chances.

What has happened?

The Council has collaborated with a range of partners to undertake a number of initiatives and approaches which have contributed towards combating the impact of child poverty. The key actions include:

- Recognised as 2nd best Borough (out of 33 London Boroughs) for leading the way in tackling food poverty.
- Worked in partnership with Family Action to provide Holiday Food and Fun – delivered a programme of activities and food for children and parents in Croydon in the holidays to reduce summer holiday food insecurity.
- Supported the government Healthy Start programme to help low income families with children under 4 years old. The Council provides vouchers to families to spend on fresh and frozen vegetables, fruit, milk and infant formula and vitamins.

- Improved the implementation and uptake of free school meals.
- Become and accredited Living Wage employer.

The following case studies highlight the work supporting this theme:

Croydon Holiday Food and Fun

In May 2019, Croydon and national charity Family Action were awarded £657,000 of Department for Education (DfE) funding to offer free holiday provision for disadvantaged children throughout the summer holiday (Jul-Aug 2019). Croydon was one of only 11 local authorities in England to be successful in this bid and was the only authority where a coordinated approach to holiday provision did not already exist.

The funding enabled the creation of the Croydon Holiday Food and Fun (HFF) model, where local schools and community and voluntary sector organisations were awarded grants and supported to run holiday programmes that included healthy food, physical activities and enrichment activities.

Holiday clubs provide a free meal during the holidays to help those who may go without and help relieve the pressure on many families. They can also help parents continue to work during the holiday, without the financial cost of childcare.

Why was it delivered

- Croydon is in the highest national 25% of children eligible for Free School Meals (FSM) at 19.8% (11,483 children).
- 22% of children live in poverty (before housing) and 31% (after housing) *End Poverty UK data*.
- 24% of Croydon residents are in low paid employment - London average 21%.
- Average 8 score attainment for children on FSM is 37.6%, the 6th lowest score for FSM children across London.
- 6 of the Borough's 220 LSOAs are among the country's 10% most deprived; 47 are in the 20% most deprived.
- 38% pupils at Year 6 are above a healthy weight.

Holiday Hunger

Many of the children in deprived areas of Croydon are at risk of what is known as "holiday hunger" this is where there is an absence of free school meals, physical and enrichment activities.

Croydon is aware that this is an increasing problem, the summer 2019 Croydon Holiday Food and Fun programme ensured healthy nutritious food was accessible to children at risk of holiday hunger. Schools, charities, community centres and youth clubs offered free nutritious food and activities for children in deprived areas over the holidays.

Additionally in Croydon, the delivery partners were asked to:

- Plan programmes in wards with the highest number of pupils eligible for FSM (free school meals).
- Offer priority places to key local target groups. Key local target groups: Looked after children, Families in emergency accommodation, SEND pupils and families Families of pupils above a healthy weight.
- Offer a family programme, where practical, to ensure whole families could attend.
- Offer SEND focused programmes, where practical, and receive additional funding to do so.
- Offer parent support services through signposting or hosting drop-in information sessions led by local specialists.

Programme outputs

- 79 four week Holiday Food and Fun programmes ran over the summer.
- 50 delivery partners were successful in their bids and went on to deliver the 79 Holiday Food and Fun programmes.
- 4646 school aged children and young people attended Holiday Food and Fun programmes in Croydon.
- 537 parent/carers attended programmes.
- 1,297 sessions ran over the summer period with an average of 27 young people at each.
- 24 programmes ran for whole families.
- 13 programmes were SEND focused.
- 18 programmes were delivered in local schools.
- 35,000 meals were served across the programme.
- 13,000 meals were provided by Akshaya Foundation.
- 20 parent sessions delivered (debt, welfare rights, benefits and housing support and school readiness).

The webpage advertising provision, had over 19000 views over a 7 week period

“This scheme has been a Godsend. I am a mother on universal credit and without this I would have been so depressed. I have 5 children under 5 and unable to get out. There is fellowship, there is support, and there is education and laughter. I am so grateful for this scheme”.

“Because of this, I am able to relax and enjoy work and the money I have saved from not having to find childcare has meant that we have been able to enjoy so many more amazing experiences together as a family and not feel like I am constantly struggling to give my children what they need. Thank you!”

Parents attending HFF programme

Healthy Start

Healthy Start is the UK's food welfare scheme for pregnant women and young children in low-income families, who are amongst the groups most at risk of experiencing food poverty.

Currently, low-income pregnant women, pregnant women under the age of 18 and children aged 1-4 years old can receive one £3.10 voucher per week to purchase fresh fruit and vegetables, milk or infant formula. Parents of children under one year old can get two £3.10 vouchers (£6.20) per week. The vouchers, which are means tested, provide a nutritional safety net, encouraging families to make healthy food choices.

Unfortunately, many families miss out on these important vouchers. As a result of low uptake, in April 2019 Croydon Council were supported by Sustains Food Power Alliance to develop actions over the course of 12 months to improve the uptake of Healthy Start vouchers in the Borough.

The Council worked in partnership with statutory, community and voluntary organisations to raise awareness of Healthy Start. It also delivered bitesize training to staff/volunteers to support families to apply for vouchers. It promoted and marketed Healthy Start via a range of mechanisms such as flyers, social media and local newspapers. It worked in partnership with local food retailers to accept Healthy Start vouchers and improve in-store promotion of the vouchers

THEME 3 ATTAINMENT

LEAVING NO CHILD BEHIND

EQUALITY OBJECTIVE

To improve attainment levels for white working class and black Caribbean heritages, those in receipt of Free School Meals and Looked after Children, particularly at Key Stage 2 including those living in the six most deprived wards.

Why did we chose this equality objective?

We have nearly 100,000 young people in Croydon and we as a council, along with our partners, residents and communities have a shared responsibility to give them the best possible start in life. All our major partners such as police, health services, voluntary organisations, local colleges and faith groups are signed up to making young people a key priority. We will build on this commitment by sharing our resources, expertise and intelligence more effectively to better safeguard children and young people and improve their outcomes.

Croydon's Borough profile (2015/16) highlighted that the proportion of children achieving a good level of development by age 5 was lower than the national average across England and significantly lower for children from poorer backgrounds. Poor levels of literacy and language among a family can have a detrimental impact on early learning and development that result in greater exclusion later on in life.

Despite improved attainment among children and young people in Croydon, gaps remained difficult to close for BAME (Black and Minority Ethnic) children, disabled children with special educational needs and those receiving free school meals, especially those who were carers and living in the most deprived wards in the North of the Borough and in New Addington and Fieldway. In addition, children who are looked after in care, especially unaccompanied asylum seeking children, of which Croydon has the largest number of any London Borough, experienced significant difficulties including trauma and mental health issues. For unaccompanied asylum seeking children there are also often cultural and language barriers.

What has happened?

- Croydon children who were eligible for free school meals out performed children nationally and in London, with 66% of them attaining the Good Level of Development (GLD).
- Outcomes in reading, writing and mathematics at the end of KS1 were positive against national averages for our Mixed, Asian, Black and Chinese pupils.

- 60% of our Looked after Children reached the expected standard or above in combined reading, writing and mathematics. This is a 19% increase from 2016/17.
- In the 2017-2018 academic year there was an overall increase in the number of looked after children achieving the expected standard in phonics screening by 10%.
- In 2017-2018 there was an overall increase in those achieving the expected standard by 19% in combined reading, writing and mathematics.

The key actions that the Council has taken to deliver this outcome are:

- The Council's school effectiveness service working closely with schools to challenge any underachievement and support improvement, including through partnerships with Academy chains and other good or outstanding schools where necessary.
- Virtual school working closely with SEND (Special Educational Needs) to ensure the swift placement of looked after children who require a new school to be identified due to placement changes.
- Continuing to ensure there are school places for all our children and young people.
- Worked with schools to help them support students with additional needs and keep those students in mainstream education.
- Working with schools to avoid permanent exclusions.

This case study highlights the work supporting this theme.

Virtual School

The Virtual School service provides advice and support to children and young people aged 3-19 years who are Looked After. The service actively puts strategies and support mechanisms in place from the moment the child enters the care system.

The Virtual School (previously the Looked after Children Education Service) is a core service within the Council's Children and Young People's Service.

It has a tiered delivery model for Looked After Children:

- Level 1 - monitoring individual attainment, attendance, Special Educational Needs (SEN), exclusions and leading on Personal Education Plans (PEPs).
- Level 2 - individual casework including negotiation and advocacy, attendance at multi-agency meetings, assessments.
- Level 3 - individual direct work with young people through interventions in school and off site for learning (underachievement), behaviour and attendance issues.

This is particularly beneficial for Unaccompanied Asylum Seeker Children (UASC) as they can be taken into the provision whilst a school is found for them.

Children from Years 7 to Year 11 can attend the provision from any local authority however the priority would be for our Croydon Looked after Children.

Virtual School offers a range of subjects, namely: English, Maths, Music, Art, Cookery, Geography and Independent Skills.

The Virtual Schools' main objective is to empower, inspire and celebrate success. As part of this process, it also;

- prepares students for mainstream school;
- identifies any behaviours or concerns, and
- supports cultural differences.

THEME 4

COMMUNITY SAFETY

EQUALITY OBJECTIVE

- To increase the percentage of domestic violence sanctions.
- To increase the reporting and detection of the child sexual offences.
- To reduce the number of young people who enter the youth justice system.

Why did we chose this equality objective?

Croydon is a diverse, friendly and vibrant Borough full of people living busy lives and helping to create supportive communities. We want to ensure that people from all of our communities feel safe.

Crime and safety is a key priority within the Croydon Corporate Plan 2018-2022. Under the theme “*Everyone feels safe in their street, their neighbourhood, and their home*”, success will look like:

- **Work in partnership to reduce crime**; including serious youth violence, domestic and sexual violence, and hate crime.
- **Anti-social behaviour** is reduced throughout the Borough, through work with partners and local community involvement.
- **Public protection** to ensure that residents and visitors are safe and that businesses are operating effectively to minimise risks.

The Safer Croydon Partnership (SCP) is a key element in the delivery of these objectives with our partners. The Safer Croydon Partnership is part of the overarching Local Strategic Partnership, which includes other partnership structures such as the Future Place Board, Children and Families Board, Children’s Safeguarding, Adults Safeguarding and Health and Wellbeing Boards.

What has happened?

Family Justice Centre (FJC)

The award winning FJC is the Council's internal service that supports survivors of Domestic Abuse and Sexual Violence (DASV). The service has worked closely with the Metropolitan Police Service to ensure officers apply for restraining orders regarding all domestic abuse cases that reach court, whether conviction is successful or not.

Croydon has been granted another years funding for 'Drive' until March 2021, a project that works one-to-one with perpetrators. Part of the Drive project is also to look at disrupting perpetrators behaviour. This project has purchased phone tracking equipment for the police enabling the arrest of perpetrators faster.

Reducing the number of young people that enter the youth justice system

There is a huge focus on diversionary work. The Council works in partnership with the police to work with young people on Out of Court Disposals rather than formally charge and send them to court. Once identified, interventions are put in place to ensure all efforts are made at the earliest point to divert young people and sign post them to services.

There has been a 30% reduction of first time entrants (young people who have been convicted of an offence for the first time) from 232 young people aged 10 to 17 during the period Oct 2016 to Sep 2017, compared 162 young people in Oct 2017 to Sept 2018. During this period around 190 young people were diverted from prosecution. This will work towards improving outcomes and life chances for young people that enter the youth justice system

The key actions that the Council has taken to deliver this outcome are:

- Transformed the Community Safety team into the Violence Reduction Network with strong engagement with the MOPAC (Mayor's Office for Policing and Crime).
- Worked in partnership to develop a public health approach to Reducing Violence in Croydon including tackling violence and delivering interventions which support those most affected by violence.
- Sustained reductions in serious youth violence falling by 21.3% reduction compared to a London drop of 4.3% when comparing April 2018 to March 2019 to the previous 12 months.
- Reduction in knife crime with injury victims aged 1-24 by 26.5% .
- Croydon being selected as the only London site of a new national pilot to disrupt perpetrators of domestic abuse and sexual violence.
- Developed an anti-hate crime action plan with partners and launched an anti –hate crime pledge which included the successful Hate Awareness week in October 2019.
- Developed a serious youth violence and knife crime action plan.

This case study highlights the work supporting this theme.

Drive

In 2019, Croydon successfully secured funding from the Mayor's Office for Policing and Crime (MOPAC) to deliver a domestic abuse perpetrator intervention called Drive. The Drive model targets high harm, high risk perpetrators of domestic abuse. One of the priorities for the Mayor of London is to end violence against women and girls. This includes tackling domestic abuse at the root cause which is the perpetrator. MOPAC's vision is to roll out this intervention or something similar across London.

The main objective of the intervention is to hold the perpetrator to account for his/her behaviour and challenge their attitudes and beliefs. This is achieved via 1-2-1 behavioural change work and or disruption. The aim of the intervention is to reduce offending in order to increase victim safety.

The intervention is delivered by Rise Mutual, an organisation whose specialism is working with abusive perpetrators. The perpetrators that may be appropriate for the intervention are identified via a Multi-agency risk assessment conference (MARAC). High risk victims are referred to MARAC with the objective of a multi-agency response to safety planning and reduction of risk. The MARAC identifies a perpetrator that maybe suitable for Drive and the case is then referred to the Domestic abuse perpetrator panel (DAPP). Unlike the MARAC (which is victim focused), the DAPP focuses on the perpetrator. Partners involved in DAPP and the intervention are: Housing, National Probation Service, community rehabilitation company, children's social care, adult social care, police, substance misuse service and SLaM (South London and Maudsley NHS Foundation Trust).

Prior to the Drive programme there were no interventions available for domestic abuse perpetrators outside of court ordered activity. Currently there are 97 open cases to Drive and 68% are fully engaged with the intervention. Of the 97 open cases there are 186 victims associated with the Drive service users and 272 children.

Deputy Mayor of London, Sophie Linden is leading and promoting the work with perpetrators. The Mayor and Deputy Mayor of London have visited Croydon to discuss the progress of the programme. Croydon was featured on the news and in Grazia magazine.

Each victim is informed about Drive before any intervention with the perpetrator. The quote that is most heard from the victims are *'I just want them to get some help'*.

THEME 5

SOCIAL ISOLATION

EQUALITY OBJECTIVE

To reduce social isolation amongst disabled people and older people.

Why did we chose this equality objective?

Being socially isolated is different to loneliness, but they are closely related. Nationally 1 in 10 of people aged over 65 said they were lonely most, or all of the time. Social isolation and loneliness affects all people across the life-course and not just older people. The Campaign to End Loneliness found 3 in 5 people who report poor health say that they are lonely some of the time or often, compared with 1 in 5 who report excellent health.

The Opportunity and Fairness Commission highlighted that not only does social isolation have a significant personal cost, but also has an implication for public services as it can lead to people needing more social and medical support. For example GPs and hospital Accident and Emergency departments had visits from people who were simply seeking someone to talk to, or because their isolation has resulted in depression or a preventable illness. In addition, people often have prolonged stays in hospital because there is no one to care for them upon discharge.

What has happened?

The development of a localities model in Croydon. The localities model aims to bring services closer to residents, embedded in local areas and better suited to the complex needs of individuals and families. Ultimately, the model supports improved social cohesion and reduced isolation. The Councils approach goes hand in hand with the local health and care integration, where partner organisations work together as 'One Croydon' toward similar aims.

The locality model includes a number of initiatives that aim to reduce social isolation directly or indirectly or contribute to improved social connectivity.

The key actions that the Council has taken to deliver this outcome are:

- Became a Dementia Friendly Borough and gained special recognition award from Alzheimer's Society, the UK's leading dementia charity, for the Borough's efforts to support people living with dementia.
- Established community led support to help individuals build on their own skills, assets and abilities and those of their friends and family; connecting people with people and with local communities.
- Established social prescribing/community referral to give GPs, nurses and other care professionals can refer people to a range of local services and activities
- Befriending service aims at elderly carers and families caring for an elderly relative. The service is made up of home visits, weekly calls and a texting service, it aims to re-connect people who are lonely and isolated.

The case study below highlights the work supporting this theme**Dementia Friendly Borough**

Examples of work already carried out/in progress:

Croydon Council – a member of CDAA, as a commissioner and a provider – Croydon Council has also made dementia friendly awareness sessions mandatory across the organisation. A blended approach, the council is working in partnership with Alzheimer's Society to enable the e-learning package to be easily available to staff alongside classroom based dementia friendly awareness sessions for people to attend if they prefer.

One Croydon Alliance – a health and care partnership between commissioners and providers with a 9 year agreement to transform services to improve the outcomes for local people. Its first commitment as part of the CDAA was to 'ensure all One Croydon partners are signed up to the CDAA as individual organisations to underpin the support for people living with dementia and their carers'. All of the five organisations that make up One Croydon Alliance have signed up to being Dementia Friendly organisations.

The Council has changed the way it commissions services to include a requirement for providers to be dementia friendly with clear evidence.

The Council held a range of events during Dementia Action Week. Events included a 12 hour knit-a-thon to create special hand muffs for people living with dementia in the Borough, a tea dance, swinging '60s event – with a 'wall of recall' and a special dementia friendly screening of Summer Holiday (1963), at Croydon's David Lean Cinema. The sessions will include the opportunity for carers and people with dementia to experience hand massages and other therapies. Events had a total of 460 attendees.

Croydon Council worked in partnership with the Fire Brigade and leisure centre staff to host dementia awareness roadshows to get people thinking about how they can support those living with the condition in the community and sharing information about initiatives such as the Herbert Protocol will help to safeguard more vulnerable people in our communities and quickly return them to safety.

The Council also ran Dementia Friendly Screenings on a monthly basis at the David Lean Cinema. The screenings aimed to be a fun and inclusive experience to enable people living with dementia, their families and carers to attend the cinema in a safe and welcoming environment. The lights were left on low, there were no adverts or trailers and the audience was allowed to move around or even sing along to any musical numbers if they wanted to.

The Council was presented with a special recognition award from Alzheimer's Society, the UK's leading dementia charity, for the Borough's efforts to support people living with dementia.

THEME 6**COMMUNITY COHESION****EQUALITY OBJECTIVE**

To improve the proportion of people from different backgrounds who get on well together.

Why did we chose this equality objective?

Communities are changing fast in Croydon, the Borough has one of the fastest growing BAME populations in London. More than 50% of children and young people and approximately 47% of adults in the Borough are from a BAME background. More than 100 languages are spoken across the Borough. Croydon also has the largest number of unaccompanied asylum seeking children. Croydon has a great sense of community pride but social cohesion is challenged when there are poor community relations and people from different backgrounds live isolated from each other. In addition, high levels of poverty lead to people feeling that a place is unequal, and they cannot influence change or trust organisations.

The Opportunity and Fairness Commission said that residents told them that too often there was a lack of respect amongst people living in their area and insufficient shared ownership of problems. Many residents mentioned people from different backgrounds moving into their local area and their struggle to create strong integrated communities especially at times when national or international activity can cause concern locally. In addition, the Commission highlighted that while migration had brought new energy and perspectives, there was recognition that communities were isolated from each other rather than working together to tackle shared challenges. Many people told the Commission that they would be willing to do more in their local community including volunteering and wanted to participate and influence what was going on locally and across the Borough.

What has happened?

Recent national events have provided a challenging environment for community cohesion. Croydon has come together as a community to support each other with partners across the Borough and faiths showing solidarity and providing community assurance. This has included community events such as We Stand Together which provide a forum to support communities impacted by hate crime and explore issues that face different communities within Croydon. The Council has continued to support community development, capacity building and events to strengthen cohesion.

The key actions that the Council has taken to deliver this outcome are:

- Croydon's cultural events calendar continues to grow and develop, showing the best of Croydon's diverse and inclusive population.
- Increasing investment in Community Ward Budgets.

These case studies highlight the work supporting this theme.

Interfaith Bike Ride

Since 2015, the Council has worked in partnership with Wheels for Wellbeing and Faiths Together in Croydon to deliver an Interfaith Bike Ride and Picnic. It forms part of the Borough's 'Big Lunch' and 'Great Get Together' summer activities. When it started 5 years ago, we believe it was the first interfaith bike ride in the UK.

The day is usually supported by a number of organisations such as the Asian Resource Centre Croydon, 7th Day Adventist Church, Addiscombe Cycling Club, Croydon Mosque and the Croydon Gurdwara.

The event consists of two elements. The first is a bicycle tour that visits dozens of places of worship, and encourages hundreds to come on a unique, healthy, two-wheeled spiritual experience. The ride is safeguarded by professional cycling instructors who provided road safety and cycling safety lessons during the course of the ride.

The second is a picnic in Park Hill where the ride ends and where members of the community come together to play games, eat food and generally have a great time. At the picnic, the attendees also enjoy free health and wellbeing workshops which are hosted by faith groups and Croydon Clinical Commissioning group.

The event sees between 25 to 50 riders each year visiting 3 or 4 places of worship in the Borough. After the bike ride, they join a further 100 to 200 attendees at the picnic. The most recent interfaith bike ride & picnic took place on Sunday 9th June 2019 and was attended by 25 cyclists and over 300 picnic goers. Up to 100 volunteers from over 30 organisations supported the event.

Participants have learned about each other's beliefs and made new friends, learnt to be safe on the road while 'riding to worship' and spent time in nature enjoying our green spaces – which some of them didn't even know existed before.

The event helps provide opportunities for meaningful involvement with community groups across the Borough. Council officers and some councillors have also joined residents to ride on this tour. Furthermore, the Mayor of Croydon, local MPs, the relevant cabinet member and ward councillors are also given the opportunity to break bread with local residents. Colleagues from the police also regularly attend the event, as does the local voluntary and faith sector who invite their service users too.

This comment from one attendee sums up what the event is all about. "... *Brilliant if somewhat surreal - the sight of bearded Muslims on bikes enthusiastically shaking the hand of a rabbi wearing a Kippah, or me sitting next to a Muslim woman wearing hijab and talking to her as we ate strange and mysterious Gujarati food with a small plastic spoon in a Sikh temple packed with Sikhs who were also busily consuming large amounts of food and drink, and no sight of any money anywhere..... A day of tolerance, respect, and seeking to understand, other people's cultures and religions...*"

Another participant described it as; '*a day of tolerance, respect, and seeking to understand, other people's cultures and religions*'

One resident remarked; "*we get to cycle and see lots of interesting local buildings which we would never otherwise get to experience*"

Holocaust Memorial Day

The Council commemorates Holocaust Memorial Day (HMD) each year to pay tribute to those that have lost their lives or lost loved ones to the Holocaust or genocide. It is an essential part of the Council objective to promote a strong, compassionate and cohesive community.

The HMD Working Group is a partnership between the Council, Faiths Together in Croydon and members of the community. They plan the annual event which consists of a candle lighting ceremony in the Town Hall foyer followed by speeches and performances. The keynote speaker is always someone with direct experience of Holocaust or genocide and the performances are made by local schools.

The event provides an opportunity for members of the community to share their stories. An example of this is when one attendee attended the event in previous years and as a result, met others and began to share his story of the Holocaust for the first time since the war. In 2019, we were honoured to have him as our keynote speaker. His story has been captured on video and an associated transcript thus providing a record of events that should never be forgotten. We also saw all first leaders come together to read the pledge which was a first for the Borough.

THEME 7 HEALTH

EQUALITY OBJECTIVE

To reduce differences in life expectancy between communities.

Why did we chose this equality objective?

The Annual Report of the Director of Public Health for 2018 identified a number of significant inequalities in health outcomes in the Borough. It is well accepted that inequalities result in poor health, social, educational and economic outcomes across the whole of the life course and across generations.

The Annual Report of the Director of Public Health 2019 looked at food. Within Croydon, 8,786 residents live in areas considered to be within the 10% most deprived in the whole country (3), (4). After housing costs, 30% (30,889) of children in Croydon (5), and 17% (10,701) of adults over 60 live in poverty compared to 16.2% in England (6). This will understandably have an impact on what and how people buy their food.

As our population grows it is essential to have the right levels of infrastructure in place to support those in need, as well as being able to prevent issues from becoming problems. This includes having high quality health and care provision.

Women born in some areas of Croydon are expected to live six years longer than their counterparts in other areas and for men, the difference is over nine years. There is also a difference in how long people can expect to live in a healthy state. As an example, women in Old Coulsdon are expected to live at least nine years longer in a healthy state than women in Broad Green.

What has happened?

Croydon has reduced the difference in life expectancy between the most and least deprived sections of the local population in both men and women. Life expectancy had increased for both men and women.

Number of permanent admissions to residential and nursing care homes for younger adults (16-64 years) and permanent admissions to residential and care homes for older adults (65+) has reduced.

The Council has revised the [Health and Wellbeing Strategy](#) which sets out the strategic direction for improving health outcomes in Croydon one of which is reducing inequalities.

Following a review of its approach to developing Council strategies, health impact assessments are now mandated as part of the initiation of any new strategy alongside equality impact assessments. Health Impact Assessments will ensure that the council maximises opportunities to improve health and reduce health inequalities in everything they do.

The key actions that the Council has taken to deliver this outcome are:

- Improved and reduced difference in life expectancy between communities.
- Croydon is at the leading edge of health and social care integration, with our award winning One Croydon alliance. This partnership is expanding to cover whole population and a health and care plan and a new Health & Wellbeing Strategy have been agreed.
- A strength based model called Community Led Support (CLS) is being implemented, this assists organisations to work collaboratively with their communities and their staff teams to redesign a service that works for everyone, that evolves and is continually refined based on learning.
- Investment into young persons' mental health services to support the help needed at an early stage.
- Working with the voluntary sector and communities to improve physical and mental health
- Continuing to work to reduce ill-health, including promoting mental health and reducing inequalities in health care.
- Developed Croydon Health and Wellbeing Strategy and Health Care Plan.

The case studies on the next page highlight work supporting this theme.

The Daily Mile and the Family Cooks Programme

In Croydon, levels of childhood obesity are above the National and London averages and many children are not meeting the recommended levels of daily physical activity. Children spend too much time being sedentary and we recognise the need for many small regular changes to be made in order to support local children to live healthier and longer lives.

Increasing physical activity levels and improving children's diet are ways in which we can improve their health and wellbeing. To address this, the Council is currently supporting two specific initiatives to increase children's physical activity levels and improve their diet.

The Daily Mile

The Daily Mile is a fun, free initiative where children walk, jog or run outside in the fresh air for 15 minutes every day in their schools and nurseries. Many children will run a mile in this time, some will run less and some will run more.

Any school or early years setting can be involved in the Daily Mile. It can be adapted to suit any setting. Schools can choose how often they initially want to undertake the daily mile with the aim to encourage children to take part every day. Croydon Council's School Food Improvement Officer coordinated and promoted the initiative to schools in Croydon.

To date, 45 Croydon primary schools are currently taking part in the daily mile, approx. 18,900 Croydon children are involved. Out of those 45 schools, 33 are in areas with the highest levels of deprivation and childhood obesity - these are in the north of the Borough and in New Addington North and South.

The Family Cooks Programme

The Family Cooks project aims to support schools with high levels of obesity, to deliver their own family cookery courses to target families. Through training, the project upskills existing school staff, enabling them to deliver cookery programmes and support families to make healthier food choices in and out of school.

Two members of staff identified from the school lead the project and attended 2 days project training (1 person could be a governor or engaged parent/carer). After the training, staff identified families and invited them to attend a 6 or 10 week Family Cooks course – at a time that suited the school and families.

- 93 individuals making up 26 families completed the Family Cooks programme.
- 93% of parents reported that their cooking was healthier and more varied as a result of completing the programme.
- 90% of families who joined the programme, attended all sessions.
- 86% of families used less fats and oil at home after the programme.
- 79% of families used less sugar when cooking and preparing food at home after the programme.
- 73% of families used less salt when cooking and serving food after the programme.

Palace 4 Life – Healthy Eagles

Croydon Council commission a weight management programme called Healthy Eagles, delivered by Crystal Palace.

Healthy Eagles aims to educate families on nutrition, lifestyle topics, healthy body awareness and promote positive parenting practices. They provide opportunities to take part in sport and physical activity in the community, as well as the opportunity to learn to cook healthy meals.

This programme targets children and families that are above a healthy weight and improves their healthy life expectancy as a result of increase physical activity levels and healthy eating

Tier 1 of the service supports schools and communities in areas of highest need and the Tier 2 service is a 7-10-week programme aimed at educating children and families that are above a healthy weight. They also provide healthy weight awareness training to health professionals, communities, schools and other third sector organisations.

The free Healthy Eagles programme spans across 7-10 weeks and focuses on the whole family. The service encompasses sessions on diet, physical activity and behaviour change techniques with the aim of reducing or maintaining weight. The programme works in the community with residents from all different backgrounds and helps them to integrate and support one another. Young people on the programme track their progress through their Healthy Eagles log book.

An increase in physical activity and healthy eating has been linked to children performing better in school with an improved concentration and more energy.

Over the 2 year period:

- 477 staff have been trained and 91% of staff said they had increased their confidence in raising the issue of weight with families.
- 771 Croydon Children who are above a healthy weight have been engaged with.
- 64% of those who lost weight maintained their weight loss at the end of the programme.
- 56% of completers show an improvement in healthy eating.
- 63% of completers show an increase in physical activity.
- 84% of the 158 participants in a cohort that provided ethnicity information were from a black, Asian or minority ethnic background.
- 5,900 families are estimated to have engaged with tier 1.

THEME 8 OUR WORKFORCE

EQUALITY OBJECTIVE

To create a modern and diverse workforce that is representative of the communities we serve and building and further developing a valued, engaged and motivated workforce.

As a council we have committed to:

- Ensuring the council has a representative workforce.
- Providing staff with training and support to enable them to manage and/or work within a diverse workforce.
- Addressing any unfair treatment in the workplace relating to any of the 'protected characteristics'.
- Recognising the contribution of the staff network groups and supporting their work.

Why do we monitor the workforce?

The workforce profile provides a valuable source of data about the Croydon Council workforce, that:

- Supports evidence of delivery of some of the Council's key workforce objectives and values, most notably: a modern, diverse and inclusive workforce that is reflective of the Borough's community; and the attraction, recruitment and retention of talented staff and leaders.
- Alongside other sources such as staff survey results and organisational health monitoring, informs and delivery of workforce planning priorities including the development of HR policies and procedures and learning and development planning.
- Is a resource to help monitor workforce performance and provide benchmarking information to assist workforce planning and equality impact analysis.

Workforce representation by protected characteristics

Our breakdown of the workforce is mapped against Croydon residents' 2011 census statistics regarding gender, ethnicity, disability and religion characteristics. Whilst Croydon has a positive gender mix, there is more to do on ethnicity and disability if we are to meet our aspiration of employing a workforce that is representative of our communities. We have made progress in increasing disclosure rates for ethnicity and disability, sexual orientation and religious belief within the last twelve months and will continue to run campaigns to encourage our staff to share their data. We are taking our efforts to increase disclosure seriously, and intend to focus in particular on improving ethnicity and disability disclosure rates by using best practice and consulting behavioral techniques to provide greater accuracy for our workforce planning and monitoring.

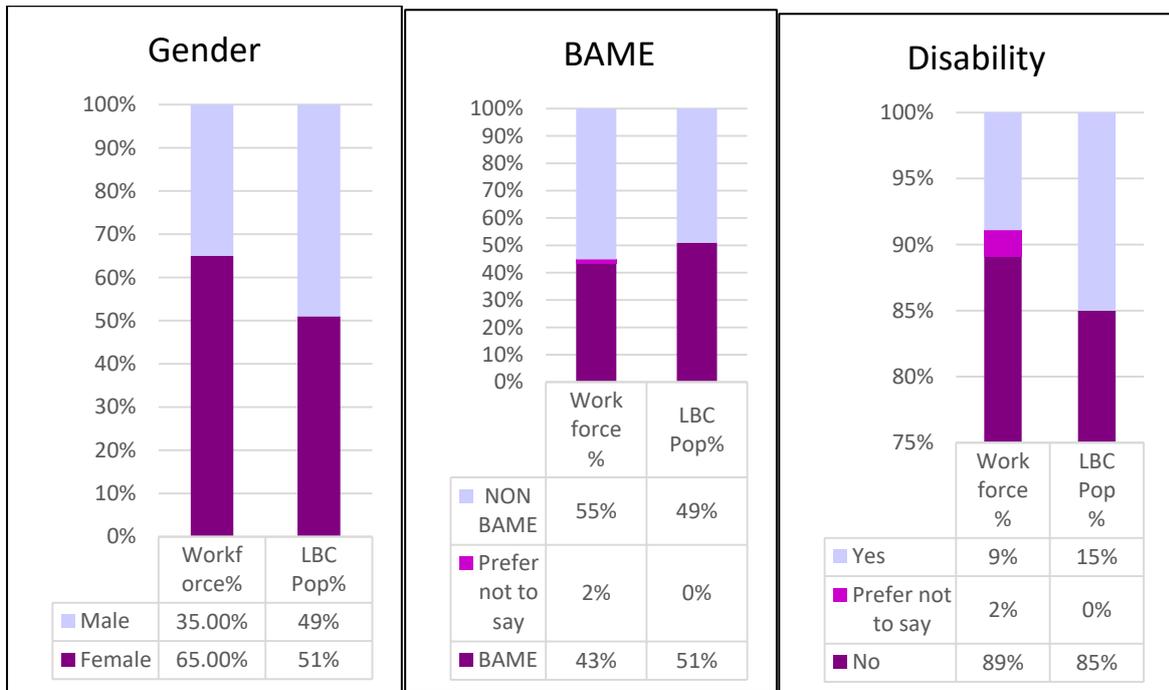
It is useful to highlight the levels of staff who have declared that they prefer not to say in respect of protected characteristics. We will be exploring via the councils culture board why individual staff may be reticent to declare and to stress the benefits of insight and understanding to inform initiatives to improve representation at all levels.

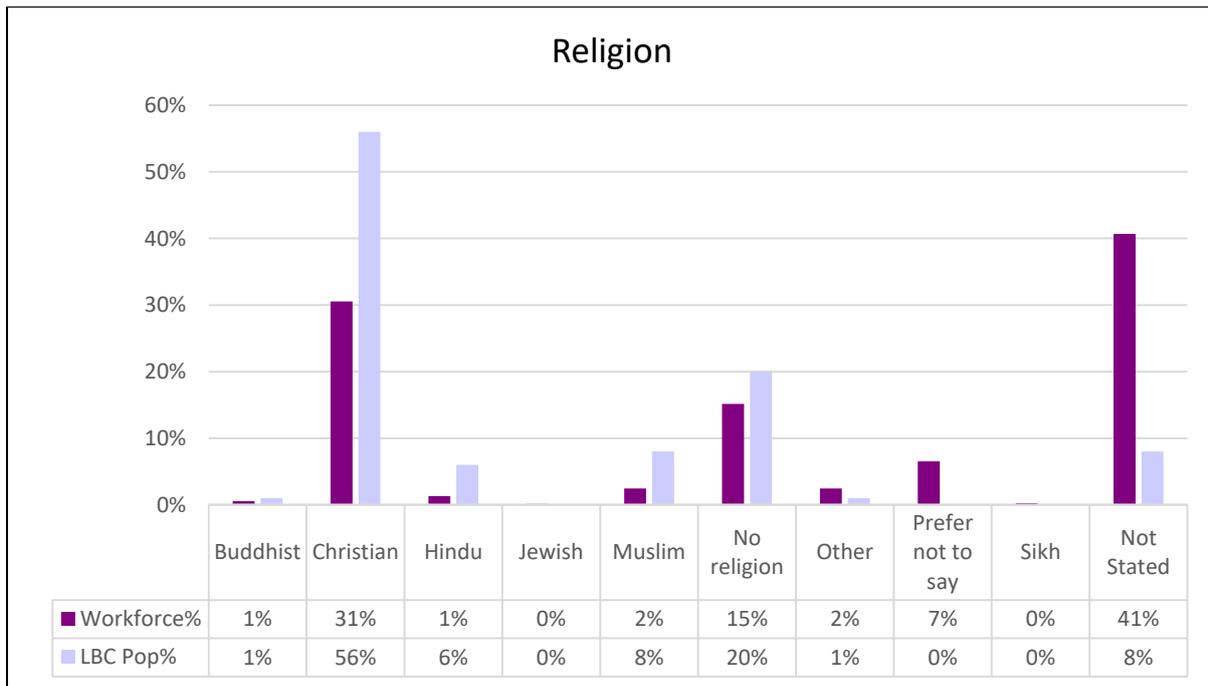
Our current non-disclosure rates (as at March 2019) for the protected characteristics below are as follows:

Ethnicity: 25%

Disability: 30%

Religious Belief: 31%





The 2011 census did not collect information from respondents on sexual orientation or gender identity, therefore the council does not have a community comparator to map against. However the council undertakes workforce monitoring on sexuality and has collated data over the last 5 years (see chart below).

During this monitoring period we have seen a small but positive increase in LGBT representation and a decrease in those electing to prefer not to say. The council also achieved a positive outcome in the stonewall index, placing it 101st out of 445 employers in 2019, its highest rating so far.

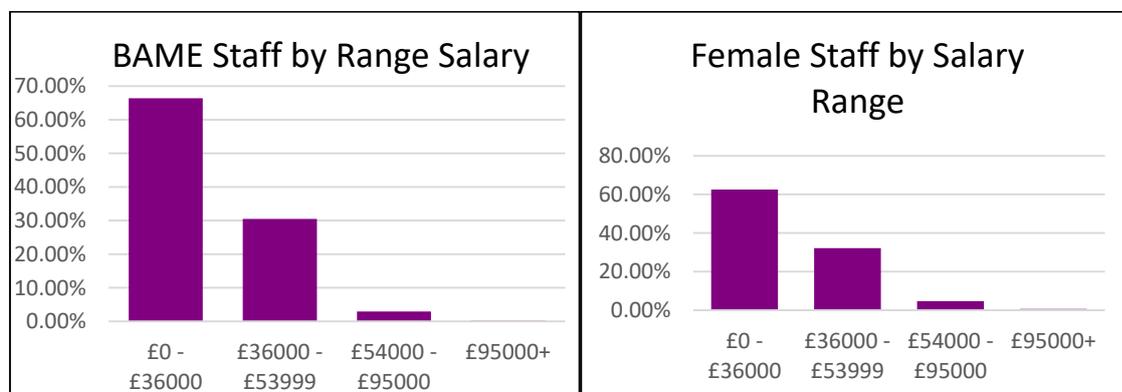
| | LBC 2013 | | LBC 2014 | | LBC 2015/16 | |
|---|----------|--------|----------|--------|-------------|--------|
| Bisexual | 8 | 0.30% | 9 | 0.30% | 4 | 0.15% |
| Heterosexual | 2,270 | 71.50% | 2,117 | 71.40% | 1,714 | 63.36% |
| *categories recorded were Gay Man or Lesbian Woman | 45 | 1.40% | 38 | 1.30% | 28 | 1.04% |
| Other | 0 | 0.00% | 0 | 0.00% | 85 | 3.14% |
| Prefer Not To Say | 854 | 26.90% | 803 | 27.00% | 874 | 32.31% |
| | | | | | | |

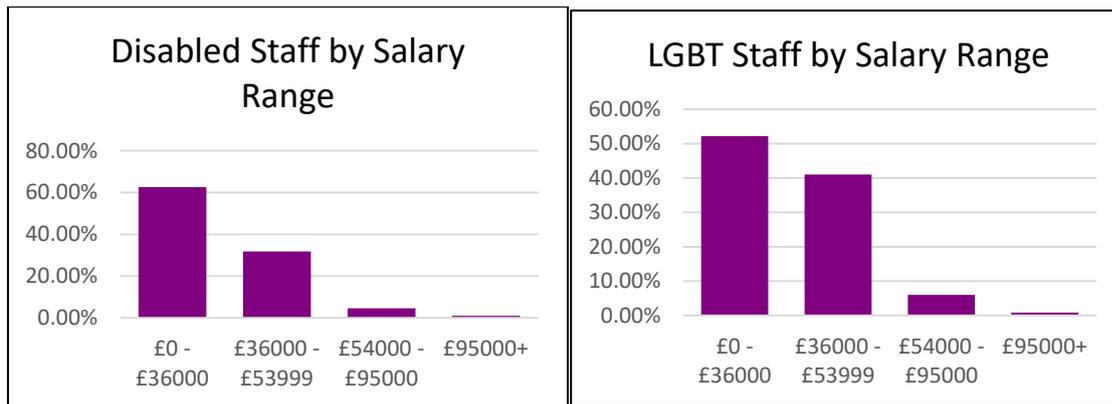
| | LBC 2016/17 | | LBC 2017/18 | | LBC 2018/19 | |
|---|-------------|--------|-------------|--------|-------------|--------|
| Bisexual | 8 | 0.38% | 10 | 0.49% | 15 | 0.65% |
| Heterosexual | 1606 | 76.19% | 1572 | 76.72% | 1,839 | 79.37% |
| *categories recorded were Gay Man or Lesbian Woman | 37 | 1.76% | 38 | 1.85% | 50 | 2.16% |
| Other | 66 | 3.13% | 59 | 2.88% | 52 | 2.24% |
| Prefer Not To Say | 391 | 18.55% | 370 | 18.06% | 361 | 15.58% |

The council has reviewed and updated terminology to describe sexual orientation categories referencing the latest Stonewall guidance and advice.

Equalities profile by earnings

It has already been highlighted that the workforce at Croydon is not yet representative of its community in respect of ethnicity and disability. The equalities monitoring of our workforce further indicates that there is also an under-representation within the workforce across salary ranges, with a negative funnelling of representation for BAME staff at senior level. It is interesting to note a more positive distribution for staff declaring a disability. From 2018-19 several senior staff were appointed which may positively influence diversity at this level but it is recognised that underrepresentation still exists.





NB data shows positive declarations on protected characteristics

Gender Pay Gap Reporting:

From 2018 it became a legal requirement for the Council to publish its gender pay gap workforce data. A gender pay gap compares the difference between how much people from one gender are paid on average compared with people from another gender. A pay gap shows whether the male gender is on average occupying higher paying roles than the female gender. It is not a comparison of pay between people doing the same work.

For the 31st March 2019 the Council will report a mean gender pay gap of -2.9%% and a median gender pay gap of 1.9%. This means that for the first time female staff are paid (on average) higher hourly pay rates than male staff.

This compares favourably in comparison with other local authorities and regional statistics. The pay gap figures have decreased by 4.5% (mean) and 0.7% (median) since 2018. The pay gap figures have been reported on the government portal and the council's website.

The Council has also published pay gap data for disability and ethnicity characteristics.

Ethnicity and Disability Pay Gap Reporting:

The actions we have taken to improve ethnicity and disability diversity have had a positive impact on pay gap figures, in the last two years.

Figure 8 (below) shows all pay gap data (gender, ethnicity and disability) from 2018 – 19.

| Year | Type of pay gap | Gender | Ethnicity | Disability |
|------|--------------------------------|--------|-----------|------------|
| 2019 | Mean ordinary hourly pay gap | -2.9% | 8.7% | -4.0% |
| 2019 | Median ordinary hourly pay gap | 1.9% | 6.3% | -5.5% |
| 2018 | Mean ordinary hourly pay gap | 1.6% | 9.7% | 2.7% |
| 2018 | Median ordinary hourly pay gap | 2.6% | 8.8% | 0.6% |

Figure 8: Table showing pay gaps calculated for gender, ethnicity and disability in 2018 and 2019.

- All pay gap figures (gender, ethnicity and disability) have reduced since 2018.
- Disabled employees hourly pay rates now exceeds non-disabled employees hourly pay rates calculated as mean or median figures.
- Disability representation within pay quartiles largely reflects their workforce representation.
- Ethnicity pay gap figures have reduced by 1% (calculated as a mean figure) and 2.5% (calculated as a median figure)
- BAME representation in pay quartiles has mainly increased from 2018 - 19

What are the key successes?

Our workforce profile illustrates that although our workforce is not yet fully reflective of the population we serve, we are seeing changes in our workforce as a result of a variety of initiatives.

These include:

- Staff diversity network groups: we have six staff diversity network groups within the council who have supported change to our workforce profile by their visibility of staff diversity through awareness raising events, communications campaigns and role modelling. They have also worked actively with the community in activities such as volunteering and event promotions.
- All staff diversity group network chairs sit on our Culture Board which is held monthly and chaired by the Chief Executive. The Board includes Staff Ambassadors and senior management representatives. The Culture Board aims to set the direction for improving culture and oversee all the changes within the council to ensure that we “create an organisation where talent can flourish”.
- The council was assessed against the Equality Framework for Local Government (EFLG) in 2019. This assessment was against five equality areas including workforce diversity as part of the ‘skilled and committed workforce’ performance measure. The council was awarded ‘Achieving’ level highlighting the solid diversity and inclusion foundation we have built. This assumes that we have key equalities policies and procedures and set up systems, to monitor delivery. The ‘Achieving’ level focuses on how well we implement these systems, policies and procedures in our practice.
- During 2019, the council undertook a baseline qualitative and quantitative analysis of the workforce to inform our workforce strategy. This included a commitment to review and update our policies including discretionary and annual leave. We also will update and review our flexible and agile working policy.
- Staff Survey: in 2018 over 75% of staff completed the staff survey which was the highest ever level of response. The results indicated that over 80% of staff indicated satisfaction with their role and over 90% were proud to work for Croydon. The council is working via Culture Board to address challenges that have been raised including

improving ICT and increasing consistent management practice. Feedback from this survey led to the development of the councils' Workforce Strategy programme which sets specific and measurable targets for us to achieve from by 2022 (see case study).

- To address inequalities in diversity at middle and senior management levels, leadership programmes have been implemented specifically for employees who are women or of BAME ethnicity. We are currently developing a leadership programme for employees with disabilities to continue to address inequalities.
- In 2018 we started a campaign within the council to increase levels of disclosure of equality characteristics by employees. By 2019, levels of disclosure showed marked improvement for characteristics including disability (8% increase); sexual orientation (4% increase) and religious belief (5% increase).
- Timewise Accreditation: we are now accredited (since December 2016) as a Flexible Working Borough and are continuing to advocate and promote flexible and agile working for our existing workforce and potential employees.
- Disability Confident Employer: we are accredited as a Disability Confident Employer (since 2017) and have continued working with our Disability Network Group internally and with the community in promoting good practice and training managers.
- ENEI awards: we achieved the Employers Network for Equality and Inclusion award for 'Overall Public Sector Winner' in 2018. In 2019, the council was Highly Commended in the Representative Workforce category which outlined the leadership and development initiatives progressed to increase the representation of BAME groups and women in senior roles.
- Stonewall Workplace Equality Index: 2019 marked our highest placing for Stonewall. We achieved a placing of 101 out of 445 employers entered, placing us in the top 25% of employers.
- REBA (Reward and Employee Benefits Association) Health and Wellbeing Awards: In 2019 we achieved the award for 'Innovation' from REBA in recognition of the ground-breaking work the Menopause Steering Group (a subgroup of the Women's Group) has undertaken to spread awareness and provide resources support to women in the workforce who have been impacted.

The key actions that the Council have taken to deliver these outcomes are:

- Supporting and developing our staff network groups
- Becoming a 'default' agile working employer since 2016 and enabling new employees to request formal flexible working patterns from the start date of employment
- Improving and promoting our policies around family friendly leave, unpaid leave and offering up to ten days purchased leave
- Assisting employees with leave for family issues including caring, premature birth and parental bereavement

What Next

Based on the data above there will be focus in the following areas in the future:

- To have our workforce profile at divisional level be at least 70% reflective of the community we serve including declared ethnicity, gender, disability and sexual orientation
- Understanding and tackling the issues regarding low numbers of BAME in senior management roles.
- Encouraging higher disclosure declarations to aim towards 85% targets particularly around ethnicity, disability and sexual orientation.
- To have representative participation in leadership programmes from all protected characteristics

The case studies below highlight the work supporting this theme

Workforce Strategy Development

In 2018 the council launched a Staff Survey which was completed by at least 75% of the workforce. Although the survey indicated a high level of satisfaction with their role and working for Croydon by the majority of staff, issues regarding inclusivity and engagement did emerge.

We were also aware that the development of a workforce strategy would support the commitments made to our residents in the Croydon Council Corporate Plan and would provide a clear promise to our current and future workforce to make the experience of working for us an inclusive, productive and happy one.

To develop the strategy from an informed basis, a baseline assessment was commissioned in 2019. The baseline assessment was conducted in two phases including the review and analysis of our current workforce data, followed by engagement sessions and workshops with our staff to test and provide insight into workforce experience.

During 2019, 49 workshops were held with 501 people attending these for a face-to-face session. We also received 323 online entries and in total had more than 5,000 comments from staff.

This baseline assessment identified themes and actions that would be most impactful to accelerate the progress towards an inclusive organisation and align with the development of the council's workforce strategy.

There was recognition of the things the council already does well to make positive change to our representative profile but also highlighted that there are perceptions and practice that need more attention to make the progress we aspire to.

The key contextual parameters from this work are that as a Borough we are changing and growing our resident base and profile to be highly diverse with one of the youngest profiles in London.

By contrast the council staff profile, whilst showing progress towards a workforce

that matches its community, still has a way to go. Over the last six months, the Council has seen a positive change in the profile of its leadership, this is a visible demonstration of our changing culture, as more inclusive. However it is clear that more needs to be done to achieve positive representation across all levels in the Council.

Key areas of impact will be to improve the recruitment process to positively support further change in levels of black and ethnic representation at senior and middle manager levels. In addition, there will be a focus on building managers accountability to increasing levels of staff engagement and inclusivity, whilst developing their skills and confidence in implementing the council's core values.

The workforce strategy for 2019-2022 was published in November 2019.

It refers to five key priorities:

Priority 1: Attract, recruit and retain talent

Priority 2: Improve engagement and well-being

Priority 3: Improve workforce equality, diversity and inclusion

Priority 4: Develop and grow outstanding leaders and managers

Priority 5: Develop a high performance, innovative, creative and achievement culture

Each priority highlights:

- The actions the council intends to do
- What we will do first

Key performance indicators are also given at the end of the strategy with specific targets for all five priorities to achieve by 2022.

Information is also given as to how the strategy will be reviewed with progress being published and reported to the council's Culture Board.

Increasing Staff Disclosure of Protected Characteristics

The council has been committed to improving the rates of disclosure by employees of their protected characteristics to achieve an overall disclosure rate of 85% by 2022. By improving disclosure the council would be able to:

- build an accurate picture of the workforce
- ensure that all members of the workforce are treated fairly (by monitoring equality of opportunities)
- ensure that staff can be themselves at work
- make sure the workforce strives to reflect the community we serve
- ensure that our policies are not indirectly discriminatory

As a council we also wanted to be accurate in our reporting of the diversity of our workforce as this would help us in planning new initiatives and campaigns.

We were aware that there were several obstacles to staff completing their equality data which included:

- Lack of awareness by staff that their data was incomplete
- Lack of knowledge (of the self-service system) by staff regarding how to complete their data online
- Lack of insight by staff into why completing this data was important
- Suspicion regarding the confidentiality of the data

We were aware that our disclosure levels were particularly disappointing (as at June 2018) for areas such as

- Disability (approx. 38 % non-disclosure)
- Religious belief (approx. 36% non-disclosure)
- Sexual orientation (approx. 34% non-disclosure)
- Ethnicity (approx. 25% non-disclosure)

As a way to tackle this issue a specific campaign to increase levels of disclosure was crafted aiming to focus on specific areas and bring Disability, Religious belief and sexual orientation disclosure levels up to around 75 -80% and Ethnicity up to 85%.

In autumn 2018 and during spring 2019 an intranet and plasma screen campaign was launched with the collaboration of Internal Communications, Human Resources and Staff Network Groups.

Information was clearly presented to staff detailing:

- How to check and update equality information
- Why it was important to do so
- Who would be able to see this information
- Asking everyone to check their data and personal contact information no matter how long they had been employed
- How the data would be used

Also included were screen shots detailing how data could be updated and an FAQ's document with answers to questions about disclosing equalities data.

Staff network groups (who comprise approximately 30% of the council) also sent out communications to staff reminding them of the importance of disclosure.

Black History Month was held in October and several 'drop in' sessions were held in October and November to encourage staff to update their equality records at that time.

Additionally, from September onwards all diversity events included a reference to disclosure in all their communications to staff.

In November, 2018 The Chair of the Mental Health Network also drafted a piece about her working life and the interaction with her physical and mental health entitled 'Why updating your One Oracle equality data helps everyone'.

In December 2018 – January 2019, the HR Equalities and Policy Manager sent out personal emails to all staff who had joined the council from 2014 – 2016 encouraging them to check and update their equalities data.

From October onwards reports were produced every two weeks to measure the levels of disclosure and non-disclosure rates for specific categories (ethnicity, religion, sexual orientation and disability). Increases in disclosure rates have been observed from June 2018 – March 2019.

Non-Disclosure Rates: June 2018 – March 2019

| | June 2018 | March 2019 | % change |
|--------------------|-----------|------------|-----------|
| Ethnicity | 25% | 25% | No change |
| Disability | 38% | 30% | + 8% |
| Religious Belief | 36% | 31% | + 5% |
| Sexual Orientation | 34% | 30% | + 4% |

As we have stated our aims in our Culture Board: “Here at Croydon, our vision of the culture of the council is to **“create a collaborative, inclusive and creative environment which allows talent to flourish”**”

Ultimately we aim to create an environment where staff are able to 'be themselves' so if they are willing to communicate openly and disclose protected characteristics this shows increasing levels of engagement and confidence in the council which will be reflected in performance levels and satisfaction surveys.

During 2020, we will move away from the terminology of 'disclosure' and encourage staff to 'share their personal data' with the council. We believe that promoting a culture of 'sharing' will re-inforce our aim of creating an inclusive environment with a greater focus on trust and less formality for staff.

We are taking our efforts to increase disclosure seriously and intend to focus in particular on improving ethnicity and disability disclosure rates by using best practice, and consulting behavioral techniques to provide greater accuracy for our workforce planning and monitoring.

We are also aiming to specifically target the areas where there are highest levels of non-disclosure. These include areas where staff may have limited access or use of computers. It is anticipated that by offering staff other options to share their data (such as completing manual forms), this will result in further increases in disclosure rates.

Appendix 1

Additional sources for information on equality and inclusion in Croydon

Croydon Opportunity and Fairness Commission Report

The Croydon Opportunity and Fairness Commission was an independent Commission set up by Croydon Council in 2015. It sought to understand the challenges faced by the people of Croydon and put forward recommendations that would help create a fairer and better place to live. You can obtain a copy of the report by clicking the link below

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon_Opportunity_%26_fairness%20Commission_final_report.pdf

Croydon Observatory

The Croydon Observatory provides access to data and information about Croydon. It is an information sharing, mapping and reporting website that can be used by anyone. The observatory contains links to key strategies, information on the Borough's demographic profile which can be broken down easily into ward profiles. The site also includes data broken down by protected characteristics as outlined in the Equality Act 2010. Please click link below to access the observatory.

<https://www.croydonobservatory.org/>

Equality and Inclusion Policy 2016-20

The council's ambition is to make Croydon a stronger, fairer place where no community is held back. It acknowledges its statutory equality duty as a Public Sector employer under section 149 of the Equality Act 2010.

It recognises it has an important community leadership role and will use this opportunity to advance equality, fairness and community cohesion as well as to improve the social and economic environment in the Borough

Please click link below for a copy of the Council's equality and inclusion policy

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Equality%20Policy%20Statement.pdf>

Workforce Profile 2017-2018

The workforce profile provides a valuable source of data about the Croydon Council workforce that provides evidence the Council is meeting its general equalities duty to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations.

Please click link below for a copy of the Councils workforce profile

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Workforce%20Profile%20-%202017%20-%202018.pdf>

Gender Pay Gap Report

A gender pay gap compares the difference between the average hourly pay of women and the average hourly pay of men. In accordance with gender pay gap reporting guidelines, Croydon Council included 3,165 people in the scope as eligible for reporting on 31st March 2018

Please click link below for a copy of the Councils gender pay gap report

<https://www.croydon.gov.uk/gsearch?query=gender%20pay%20gap%20report%20>

Ethnicity and Disability Pay Gap Report

The ethnicity pay gap compares the average hourly pay of disclosed BAME (minority group) and white (majority group) employees.

The disability pay gap compares the average hourly pay of disclosed disabled (minority group) and non-disabled (majority group) employees.

Please click the link below for a copy of the Councils ethnicity and disability pay gap reports

<https://www.croydon.gov.uk/sites/default/files/Croydons-Ethnicity-Disability-PayGap-March20.docx>



Equality Peer Challenge
London Borough of Croydon Council
Report
4-7 November 2019



1. Background

The London Borough of Croydon (LBC) asked the Local Government Association (LGA) to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government. This report is a summary of the peer team’s findings. The Peer Challenge is designed to validate a council’s own self-assessment by considering documentary evidence and carrying out a series of interviews and focus groups with employees and other stakeholders.

The basis for the Peer Challenge is a benchmark against five areas of performance. They are:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

The Peer Challenge is not an inspection; rather it offers an external assessment by critical friends who have experience of delivering an equality/diversity agenda in their own councils.

Peers were:

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|---|
| Councillor Brigid Jones – Birmingham City Council |
| Sam Johnson – BCP Council |
| Akua Agyepong - Kent County Council |
| John Cowings – Derbyshire County Council |
| Gill Elliott – Local Government Association |
| Laura Wilson – Local Government Association (Shadow peer –part) |

The team appreciates the welcome and hospitality provided by the Council and would like to thank everybody that they met during the process for their time and contributions.

Executive Summary

Following this Equality Peer Challenge, we have reached the following conclusion:

The London Borough of Croydon has completed a satisfactory self-assessment against the criteria for the Achieving level of the Equality Framework.

We were impressed by the strong commitment to equality from political and organisational leaders within the Council. The two cabinet members with lead responsibility for equality are seen as highly effective in bringing about positive changes. Member champions for diversity bring energy, passion and leadership on a number of equality issues. In 2014 the Executive Leadership team did not reflect the borough or the workforce. Now it is visually diverse and members of the Executive Leadership team are serving as role models for the rest of the organisation. The Chief Executive is widely credited with accelerating the positive culture change and prioritisation of equality, diversity and inclusion in the Council. Managers across the authority spoke confidently and with excitement about their work to advance equality of opportunity.

There is a clear link between equality, diversity and inclusion and the council's ambitions, from the political administration's manifesto to the corporate plan to cabinet responsibilities. Equality governance is spread across the Council and includes the corporate leadership team, Cabinet, the members' equality and oversight group and staff equality networks. Equality scrutiny mainly takes place when particular policies are taken to a scrutiny committee. However, scrutiny on equality more generally could be strengthened by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives. The equality staff networks are well supported and are really making a difference to the progression of equality within the organisation.

The Council's support for equality and diversity is visible in the community. It supports and participates in numerous celebrations and events including Pridfest, Mela and Diwali. LBC has strong partnerships with its statutory partners and the voluntary and community sector (VCS). Organisations representing the VCS feel that they are equal partners with the Council and that they are consulted with and can influence the decisions of the Council through the Local Strategic Partnership (LSP). We heard about many good examples of how the Council works well with its partners to deliver services, including the introduction of Integrated Community Networks and community-based multi-disciplinary interventions as part of the One Alliance partnership between the Council, health partners and Age UK Croydon. Another excellent partnership is Croydon Works, a job brokerage partnership between the Council, Croydon College and Job Centre Plus. It was set up to ensure disadvantaged Croydon residents are able to access the job and training opportunities that will be created by the regeneration Croydon is set to see over the next few years.

Use of data is an important and an improving element of the Council's operations. It collects and uses a wealth of data from a wide range of sources including health and

other partners. Data is utilised effectively to support the Council's new localities-based approach to service delivery. Services are starting to be tailored to meet the needs of communities and are responsive in the recognition of the various inequalities, needs, strengths and characteristics in each. This connected community approach is being piloted in three specific areas – North Croydon, New Addington and South Croydon. However, there are still some challenges around data sharing, particularly with health partners.

There are almost 400,000 residents in the borough which is estimated to rise to approximately 445,000 by 2031. Nearly 51.7% of Croydon's residents identify as BAME and reside mainly in the north of the borough. The resident profile of the south is significantly less diverse than their northern neighbours. LBC has a good understanding of its communities, including the BAME community, although we found that this knowledge is not consistent across all services and the Council works hard to involve its community in the development of services. The participation of young people is particularly strong.

The Council is keen to improve access to its services. The Gateway approach focuses on the broader, holistic needs of people and aims to reduce the barriers to and between services. One of its portals, the Family Centre was highly praised by service users and described as "amazing", for its "can do – solution focussed" approach. The Council has plans to improve the customer service at Access Croydon in terms of its physical layout, IT provision and staff resources. Good progress has been made on the plan, and priority should be given to ensuring that funds are available for the remainder of the plan to be implemented without undue delay. Staff reported feeling empowered to be responsive to customer needs but worry about the impact of the time this takes on performance measures and are acutely aware of the limitations of the current offer.

Equality Impact Assessments (EIA) are integrated systematically into service planning and decision making across the organisation. However, the quality of EIAs overall still needs to be improved. The quality of analysis is variable and assumptions are being made in some EIAs where there is no data to support them.

It is very clear that the Council has embarked on significant culture change within the organisation. A staff survey in 2017 found that whilst the vast majority (91%) were proud to work for the local authority, 41% felt bullied, harassed or discriminated against. Workforce data also showed that minority groups such as BAME, people with disabilities and LGBT staff were not representative of the community at senior levels of the organisation.

The council commissioned an external review of its workforce policies and practices, and all 17 of the recommendations from the review – on issues including recruitment, appraisal, codes of conduct and training and development – were incorporated into a new Workforce Strategy. Diverse recruitment panels have been put in place for senior appointments. There is targeted leadership development for BAME and women and plans in place for leadership development for disabled staff. Around a third of staff who have attended these programmes have already been promoted within the organisation. However, the appraisal process, which is no longer linked to

pay, still has an over representation of BAME staff in the lower quadrants. Levels of BAME grievances have fallen but are still too high and black men are still not progressing in the organisation at the same rate as their female counterparts. Further exploration to determine why this is the case should be undertaken and action taken, to address this incongruity.

Rates of non- disclosure about protected characteristics by staff are 34% for all protected characteristics including sex and race. The organisation has undertaken some work to increase disclosure rates and plans to build on this work this year.

The Council offers a wide range of learning and development opportunities for staff around equality and diversity issues with some equality training for new starters and managers being mandatory. Despite this, some staff were not aware of the council's equality objectives, though they had been in place since 2016. This could be addressed as part of the service planning process and with better internal communication via the intranet, team briefings and staff networks and noticeboards.

Staff feel well supported by their managers, but this is not consistent across the whole organisation. We heard that some requests for reasonable adjustments from disabled staff are being treated more as recommendations by managers and not as measures they are required to take. BAME and disabled employees are still disproportionately involved in disciplinary and grievances procedures.

We found some outstanding and even exemplary HR practices and policies. The organisation is Level 2 of "Disability Confident". It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter. The Council has a low gender pay gap of 1.6%. It also measures disability and ethnicity pay gaps (ahead of legislative requirements, demonstrating that it recognises inequality in pay beyond single characteristics). Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace. The apprenticeship scheme is very accessible and has a high proportion of apprentices with a learning disability. There are good industrial relationships with the Trade Unions, with opportunities to harness the resources of the trade unions to positively contribute to the equality agenda.

2. The Council made the following observations on the impact of the peer challenge:

Croydon has equality and diversity set at the very heart of our borough. We are very proud of our borough, its diverse mix of people and places that makes it a great place to live and work. Our ambition is to ensure growth that benefits all in the borough, and improving equality of, and access to, opportunity. This is set out in our Opportunity and Fairness Commission report, and embedded in

our Community Strategy, Corporate Plan and supporting strategies. The organisation has made great strides in responding to and delivering against the strategies and plans.

Our vision is to be a high performing organisation that is collaborative, inclusive and innovative, that allows talent to flourish and builds our workforce capability to meet our ambitions and reflect our community - where everyone can speak up, speak out and have a voice in the future direction of the organisation - where fairness and justice feel real, and where bullying, harassment and discrimination are not tolerated.

We are proud of the actions we have taken to date and recognise we have much more to do. This is why the Council proactively sought to undertake the Equality Framework for Local Government (EFLG) Accreditation. The process and our external assessment have helped us to identify and confirm what we do really well and where we need to improve.

We would like to thank the peer team for their time and effort and look forward to working with the LGA to drive through our improvement plan and deliver better equality outcomes for our staff, residents and communities.

3. Detailed findings

3.1 Knowing your communities

LBC's operating model is based on six key themes which set out the way the council wants to deliver its services to ensure that it achieves the best outcomes for residents. The first theme is 'evidence is key.' It tasks the organisation with ensuring that data and evidence is used to inform the development of key priorities and future service design. In 2016, the Council commissioned an Opportunity and Fairness Commission (OFC) to survey residents on their feelings about poverty and inequality to examine issues affecting the Borough such as deprivation. The work of the OFC has since supported the Council's ambition to reduce inequality and promote fairness for all communities, leading to the development of the Opportunity and Fairness Plan 2016-2020 setting out the council's equality objectives. This drew on information from the Borough Profile, Index of Multiple Deprivation, as well as the views of 3,000 people including staff, residents, local businesses, community and voluntary organisations.

The Council currently gathers, stores and uses a wealth of data from a wide range of sources including health and other partners, the Croydon Observatory, JSNA, Office of National Statistics, Census, public health data, and locality mapping. There are shared data sets across key partners, for example Job Centre Plus and Croydon Working. The One Croydon Alliance on health issues has shared data protocols and there is parity of esteem amongst its members. Its data informs the Council's localities work. Members have a good understanding of their communities and contribute soft intelligence and information about their wards.

There are still challenges around data sharing, particularly with health partners and some of the Council's data is inconsistent with that of partners. For example, the number of people with a learning disability in the borough and the number of unaccompanied asylum seeker children. Data storage appeared to be somewhat ad hoc and not all in one place or easily accessible to services. The Insight, Data and Performance Team is skilled at challenging stereotypes, recognising gaps in knowledge and double-checking what data is really saying by consulting with communities. There has been an intelligent evidenced based response to issues, for example the Violence Reduction Partnership and the Vulnerable Adolescents Review which has informed real changes in practice. Data is being used to improve services, for example school admissions.

In following the 'evidence is key' theme, the Council recognised that it needed to develop a detailed data picture of each locality area to combat inequality. This led to the development of its localities based working approach as one key response to the effects of austerity and different levels of vulnerability and need in the borough. Data and intelligence are used to determine the priorities in each area. The approach is helping to tailor services to communities most in need. It has involved adapting the way that the Council delivers and commissions services to respond to the various inequality, needs, strengths and characteristics in each of its communities. The approach is being piloted in three areas – North Croydon, New Addington and South Croydon.

There are different levels of equality data collection/use depending on the service. Some services such as Children's and Adults Services are good at using equality data to develop links between services and improve services. For example, data was used to reduce the number of late applications for primary admissions. Following analysis of the data, the group of parents or carers most likely to make late applications for primary school was identified. Specific communication channels and opportunities were used in order to target the groups to reduce the number and increase the opportunity for parents to apply to their first preference school.

Not all managers are confident about interpreting equality data, although there has been some good work to address this. The data team are centrally managed, but they also work closely alongside services department spending part of their time co-located in the areas that they are serving and attending the management meetings of their departments to ensure that data is being shared and the team is focusing on areas of most impact. However, this does not always include sharing equalities data or focussing on areas of equalities need.

LBC does have an understanding of its BAME community but it needs to ensure that it fully understands the diversity of the various communities making up the 'BAME' community, for example Eastern European communities. Given the large numbers of BAME people in the borough it should be possible to present disaggregated data on BAME communities in council documents and other communications. The voluntary and community sector also said that the Council understands the sensitivities of different communities in the borough, for example supporting the use of food shops rather than food banks.

There are some gaps in the Council's knowledge of communities in the borough such as the LGBT+ community. Data in relation to these other protected characteristics seemed to be less well developed and utilised. The data used tended to be quantitative and it was not clear how the Council tapped into more qualitative and experience-based data from harder to reach protected characteristic groups. The authority may want to explore how it can develop better data on less familiar groups using a broader range of methods, including consultation and engaging directly. Engaging with smaller organisations that work with these communities or identifying partners who may already be delivering services in Croydon may help to fill these data gaps.

Recommendations

Ensure that any new systems capture all the protected characteristic data of service users and the community.

Consider how to provide all staff with the skills and confidence to collect and interpret protected characteristic data and understand the importance of that data.

Enable the data teams to share equalities data with service teams so that there is a greater focus on equality impact and need in these discussions.

3.2 Leadership, partnership and organisational commitment

There is strong commitment to equality from political and organisational leaders within the Council. They recognise that more needs to be done but there is a good level of pride and eagerness to learn and improve. Both the Chief Executive and the Leader have an "open door" policy. Member champions for diversity bring energy, passion and leadership to particular issues such as autism, mental health, dementia and BAME. The borough has declared itself a "White Ribbon" borough to highlight the issue of domestic violence. The Leader is a White Ribbon ambassador and a champion for the LGBT community. The Chief Executive is widely credited with accelerating the positive culture change in the organisation. She is seen very much as a role model and staff praised her for her visibility within the organisation and her willingness to talk to staff. There is a visually diverse leadership team which has had a positive impact on staff.

The new administration has led a clear shift in making equality and inclusion a priority. There has also been a strong drive on early intervention and prevention work via the Localities model. There is a clear link between equality, diversity and inclusion and the council's ambitions, from the political administration's manifesto to the corporate plan to cabinet responsibilities. The Corporate Plan 2018-2022 sets out commitments to ensure that no community is left behind. The plan outlines its key priorities, one of which is to continue to eradicate inequality and ensure that Croydon is a place where all have the opportunity to live, work and flourish.

Progress is monitored at the members' equality and diversity oversight group. Cabinet members understand their areas and could talk in detail about what is needed. Both the named cabinet members with lead responsibility for equality are widely praised for their leadership and support of the issue.

Other elements of equality governance at LBC include the corporate leadership team, the six staff equality networks and Cabinet. The Culture Board brings together all that the council does to make sure that it has the right people, with the right skills doing the right jobs to deliver better outcomes for local people. Membership includes the Chief Executive, Executive Leadership Team, Chairs and Sponsors of the Staff Diversity Networks, Equalities Manager and representation from Human Resources, organisational development and communications. The organisation is currently in the process of refreshing its Culture Board. The Council may consider establishing a service level steering group (constituted with Assistant Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans. The Council might also consider reviewing the level of resourcing for the corporate equality function to provide some support for the one equality officer.

Opposition members feel much less engaged with the equality and diversity agenda. Those we spoke to said that they would like to be more involved. Several councillors raised concerns about the increased adversarial nature of politics between members and from the public, particularly at Council and planning committee. It is important to ensure that all representatives of LBC live up to its values and behaviours, and support members to do so. The Council wants to encourage people from all parts of the community to take part in civic life as councillors and in the community, but people with a protected characteristic may well be put off if there are obvious tensions and poor standards of behaviour between Council members. Consideration should be given to training for chairs of meetings to recognise and handle inappropriate behaviour. Any efforts to reduce tensions should be on a cross party basis. The Council is aware of the issues that have been raised and are currently addressing them via a governance review. The review is making recommendations around democratic engagement with the population and greater backbench involvement in decision making and policy development.

There is no overview and scrutiny committee with equality and diversity specifically in its remit, although scrutiny committees do take equality issues into account when considering reports. Examples include the workforce strategy, the parking policy and the night time economy. The Chief Executive also takes an annual report to scrutiny that includes equality issues. It is important that scrutiny members continue to consider the equality implications of reports they look at, and the Council could also consider giving one of the existing scrutiny committees the responsibility for scrutinising progress against the equality strategy and objectives.

The Council has strong partnerships with its statutory partners and the voluntary and community sector (VCS). The Council's VCS strategy sets clear priorities for joint work. Despite reductions in Council budgets, its support for the work of the VCS has been preserved. Sector representatives praised the involvement and engagement of

individual council members with the work of their member organisations across the borough. They feel that the Council understands the role of the VCS as a “broker” between the community and the council. They described how they work with the Council to get messages out to their communities at times of crisis, such as after stabbings or hate crimes.

Much of the VCS has also started to adopt the localities model of working. Umbrella organisations for the sector now feel that they have more of an equal voice “at the table” and that they are consulted with and can influence the decisions of the council and other partners via the Local Strategic Partnership. They see themselves as a critical friend to the local authority. They understand that many of the council’s services are now being accessed online but also feel that there needs to be more investment from the council in ensuring that residents have the right digital skills.

There was a general view expressed by most of the voluntary sector organisations we spoke to that the high turnover of commissioning/contract management staff in the council makes relationship management harder to maintain as new staff do not understand their issues. Better handover arrangements would help to alleviate this. Some VCS organisations feel that commissioning officers do not always understand the culture and context they are operating in. They gave the example of complex monitoring for organisations receiving very small amounts of funding. VCS organisations would also like greater clarity on how they can get access to being based in council buildings. They felt that the current system is rather obscure and perhaps based on who you know in the council. We understand the Council is already addressing these two points. Recommissioning of the community fund was designed based on VCS feedback and the monitoring is much lighter for those on lower funding levels. There is a draft policy going to Cabinet, which sets out clear and transparent approach to property and property subsidies.

Procurement and commissioning is being used effectively to deliver equality outcomes. LBCs values are fed into tender specifications. Contracts in excess of £100,000 are assessed with equality metrics. Service providers are required to collect equality monitoring data and provide equality training to their staff. Potential contractors are required to provide apprenticeships where possible for those who are furthest from the job market or from hard to reach groups. LBC has signed up to the Anti-Slavery Charter and the Construction Charter and insist that those who deliver services on their behalf have proper whistleblowing policies and procedures in place to reduce exploitation and discrimination. LBC has been successful in ‘disrupting’ the market which has led to increased wages for carers and better quality adult social care. It asks providers to work to similar objectives through a Suppliers Code which requires suppliers to pay the London Living Wage. This has worked particularly well in the Health Care Sector where it is impacting on BAME people who are over represented in the care sector. Larger council contracts are frequently broken into smaller lots so local companies can get access to them such as pest control and cleaning services.

The Council supports and participates in numerous celebrations and events including Pridefest, Mela and Diwali. It has recognised that celebrating diversity is also a good opportunity to showcase local businesses and boost the local economy. An example of this are the events held in Surrey St Market during Black History Month.

The quality, use and outcomes of Equality Impact Assessments (EIAs) still needs to be improved. Several that the peer team saw lack analysis and assumptions are being made where there is no data to support them. Intelligence from frontline staff is not routinely used to inform analysis. There needs to be earlier engagement with communities about EIAs. Too many EIAs record that, “everyone has equal access to this service” for all protected characteristics. There is concern from opposition members that EIAs are never mentioned at Cabinet and changes to proposals as a result of EIAs are never very evident. The implementation of outcomes needs to be monitored with heads of service and executive directors being held accountable for the outcome.

Recommendations

Consider establishing a service level steering group (constituted with Assistant Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans.

Strengthen scrutiny on equality more generally by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives.

Consider how the council can assess outcomes for contracts in excess of £100,000 using equality metrics as well as contract monitoring in relation to collecting equality information and providing equality training for staff. There is a need for consistency across the organisation and support to ensure this is happening.

Review the level of resourcing for the corporate equality function to provide some support for the one equality officer. Increased organisational capacity would also help to improve EIA monitoring within services.

3.3 Involving your communities

There are some good examples of how the council involves its communities in developing and delivering services. The Get Involved consultation platform enables residents to influence policy making via an app, PC or tablet. There is also more direct engagement, for example staff went out to the Whitgift Centre to consult with the public face to face about changes to the provision of respite services. There was community involvement in the closure of homes that provided overnight respite care services and redirection of funding to the Cherry Hub.

It is important to consult with the broadest possible range of people. We heard from VCS partners and staff that the Council is not talking to the more hidden communities such as LGBT people or people from A8 countries such as Poland and

Latvia. It is also important for less obvious partners to be involved such as young carers in the One Croydon Alliance. Not all consultations have equality impact assessments and this is something the council wants to address. Using equality analysis can help to identify potential consultees who may not be immediately obvious. The Council would benefit from developing links with smaller communities to help inform understanding of their needs and incorporate them into the development of services.

The Council needs to ensure that communities and service users are informed of the outcomes of consultations. We heard from one organisation that they had contributed to consultation for the “Walk in Our Shoes” report, were informed of the subsequent recommendations and felt listened to at the time but were not informed of the outcomes or if any of the recommendations have been taken forward at all.

The participation of young people in representing this group is particularly strong. There are many opportunities for them to be involved in developing and improving services for young people. Examples include the Young Director Apprenticeships, the Forum for Special Educational Needs, the Youth Offending Forum, Total Respect training where young people train council staff and members, the Youth mayor and the Care Leavers Forum. The new Children in Care forum EMPIRE is very active and represents diversity well.

Community Ward budgets are a useful tool for members to get involved and to give local residents a say in how the money is spent in their areas. It might be a good idea for the Council to consider developing some criteria for what the community budgets are spent on to ensure that projects are contributing to their own strategies and meeting the most need in the borough rather than an individual councillor’s preferred project.

The Asset Based Community Development approach is welcomed by some in the voluntary sector as a way of empowering and involving people. Most felt that it was working well. The Council does need to consider that communities with fewer assets might need more support and services.

It will be important for the Council to continue developing its approach to communications to improve access to services. Take up of some services is low, for example, personal payments. The Council should continue to improve and maximise communication channels both internally and externally. It may wish to explore how it can develop engagement opportunities for smaller less visible communities with a protected characteristic, using conversations and smaller scale engagement to help shape its services to those communities.

Recommendations

Ensure that all consultations have an EIA. This is important due to potential legal implications relating to meeting PSED and Gunning Principles. The organisation should also monitor participation on consultation so that they know which communities are not engaging.

Develop links with smaller communities in the borough to provide better understanding of their needs when developing services.

Ensure that communities and service users are informed of the outcomes of consultations.

Develop some criteria for what community budgets should be spent on to ensure that projects are contributing to the Council's own strategies and meeting the most need in the borough.

3.4 Responsive services and customer care

There is a clear intent to link services to the equality agenda. Service delivery plans set out how their services will contribute to the corporate plan and the equality objectives, as well as indicating how equality and diversity data has been used to plan services. Some services are less good at identifying the link with equality, but staff felt that there could be a stronger focus on the equality outcomes of service delivery. Conversations have been held with the community to identify diverse needs that can be met with targeted interventions. Services include credit membership of food shops instead of food banks that sit alongside a range of other frontline services making them more accessible.

The Localities approach is a desire to shift services away from "One size fits all". It is already working in the three areas where there is the most need. Children's Services and Education are moving to locality working to make services more tailored and responsive to local need and address differences. An example of a good tailored project is St Mary's School and pupil referral unit which targets resource to address intense pupil need. As the localities approach is expanded it will be important to ensure that services are responsive to the needs of the whole borough including the south and that the area-based approach doesn't create new inequality. The Council may wish to consider auditing access for people across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require.

There are many good examples of how the Council recognises the nuances of its different communities and works well with its partners to deliver services which are meeting diverse needs. For example

- domestic violence groups for Asian women
- knife crime workshops
- early services for children and families linking them to VCS support to prevent crisis.
- work with landlords to create affordable housing and also tackling poor housing

- schools are being encouraged to work in partnership with the Information, Communication, Technology (ICT) sector to improve diversity in the sector
- the dominoes club to engage with afro-Caribbean men
- Tamil men's group
- Refugee Support Centre

We also heard about initiatives the Council is investing in to save money in the future and achieving better outcomes. Unaccompanied young asylum seekers aged 16-18 are being placed in foster care rather than supported living. Although it is more costly, it saves money in the long term and gives better outcomes for the young people because supported living accommodation can become a magnet for exploitation. An Unsuitable Housing fund has been created to provide homes for families where their accommodation is unsuitable and where children might have been taken into care. The initiative keeps families together and has made savings of around £420,000.

There is currently no real sense of how accessible services are across the borough. For example, officers recognise that there is a gap in LGBT+ health provision. They also recognise that they could make better use of Member expertise. Staff also said that they could provide more responsive services if they had more information and insight about other services in the Council. They felt that there should be better communications between departments to improve the customer experience with more sharing of and access to information, within the boundaries of GDPR.

The Council is keen to improve access to its services. Its Gateway approach enables a focus on the broader, holistic needs of people and reduces the barriers between services. One of its portals, the Family Centre, is praised by service users for its “can do – solution focussed” approach. It provides a gateway to a range of services for communities which may not have traditionally engaged with the council or specific services because of cultural or other reasons. One service user commenting about a member of staff said “She did in 5 hours what nobody had done for me in 5 years”. The Council has a policy of sharing buildings with key partners to make access to services easier. For example, the Department for Work and Pensions (DWP) is located at Access Croydon in the Council's main building. Council welfare advisers actively help people with their DWP claims.

There are plans to improve service delivery at Access Croydon in terms of the physical layout, IT and staff resources to provide responsive services and improve the outcomes for the people who attend. An equality audit had identified that staff were working in a hostile environment and that the customer experience was poor. Changes have already been made such as the removal of telephones from walls to make them more accessible and the relocation of the credit union to a more discreet area to provide better privacy for customers. Personal space has been improved to support vulnerable people such as survivors of domestic violence, which has

enabled services to be provided with respect and accessed with more dignity. There is a strong emphasis on developing staff to be able to meet customer needs, for example Family Centre Staff will be training the Gateway Team at Access Croydon making good use of their expertise and good practices to improve services. Staff feel empowered to be responsive to customer needs but worry about the impact of the time this takes on performance measures. The Council should consider whether services to meet equality needs are adequately resourced in the Contact Centre. The opening hours of the Contact Centre 08.00 to 4.00 Monday to Friday may not be responsive enough to all customer needs. We also heard that the out of hours contact facility is not always adequate.

The digital offer, with regard to the existing website, online services and internal systems needs to be more responsive to staff and customer needs. Staff have had an upgrade of their laptops but not to full functionality. Some web pages also need to be better, for example we were told by some staff that the My Account feature does not always work. We understand that staff have high quality equipment and core software - full enterprise suite of Microsoft Office 365 apps enabled, so it may be more an issue of training, capability and behavioural change as opposed to technology issues. The VCS thought that the Council could do more on digital services by providing more training and outreach for residents and taking longer to roll out new systems to enable people to adapt to new ways of working. There is a commitment to address these issues in the Council's Digital Strategy, published in July 2019 which is already being delivered.

Young people are involved in developing services and commissioning suppliers. The Young Commissioners Scheme enables the young people to score services. They are also listened to in recruitment processes. As a result, people like youth workers with lived experience of the young person's issues may be given preference over social workers.

Recommendations

Increase the focus on the equality outcomes of service delivery. Service delivery plans do set out how their services will contribute to the corporate plan and the equality objectives. However, services should not lose sight of the outcomes and the difference that is actually being made.

Consider auditing access to services across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require. This would include the south of the borough.

Enhance opportunities for greater communication between staff in different departments. This would allow for more sharing of and access to information, (within the boundaries of GDPR) to improve the customer experience.

Review the opening hours of the Contact Centre as they may not be responsive enough to all customer needs.

3.5 A skilled and committed workforce

It is very clear that the Council has embarked on significant culture change within the organisation. A staff survey in 2017 indicated that although the vast majority (91%) were proud to work for the local authority, 41% felt bullied, harassed or discriminated against.

The Council set out to gather more data and opinions from staff to find out what the issues were and where the barriers to making the workforce more diverse at all levels were. A consultant was employed to work with HR to undertake deep dive investigations and focus groups with staff. The work was overseen by Members. The result was 17 recommendations which have been incorporated into a new Workforce Strategy. Amongst the recommendations were diverse recruitment panels, a new appraisal process and codes of conduct for staff and Members.

The staff we spoke to understand that the Council is on an improvement journey and are proud to work for Croydon and “proud to serve”. They feel that the Council has exceeded their expectations as an employer. In 2014 the Executive Leadership team was all white. Now it is visually more diverse and members of the Executive Leadership team are serving as role models for the rest of the organisation.

Targeted leadership development for BAME and women has already started to see results. 33% of the 75 BAME staff and 37% of women who took part in the programme have either been promoted, seconded or had a new interim post. There are also more opportunities for coaching and mentoring for all staff. The Council is working on reciprocal arrangements with neighbouring boroughs to deliver on the recommendation for diverse recruitment panels. The appraisal process is no longer linked to pay, however BAME staff are still over represented in the lowest quadrants. Whilst levels of BAME grievances have fallen they are still too high. Despite all these initiatives black men still do not appear to be progressing at the same rate as their female counterparts. Further exploration of the reasons for this is required.

The Council has a baseline of workforce data to measure improvements. However, despite a high-profile campaign, rates of disclosure are still very low at around 34% for all protected characteristics, including gender and race. This is unusual as it is more common to have low disclosure for sexual orientation, religion and disability. Problems with the computer system may account for some of this but we also heard from staff that people are worried that disclosure of protected characteristics will impact negatively on them in restructuring exercises or the attitude of their manager. The organisation needs to improve its level of disclosure against the equality monitoring data and it has started to address this. It also needs to review the presentation of workforce data to more easily identify where action is needed. The organisation has been responsive to the previous staff survey by planning to use an external provider for the next survey to reassure staff about anonymity.

Spending on learning and development has been increased to take account of the culture change and new approaches to service delivery such as the localities approach. There are a wide range of learning and development opportunities for staff around equality and diversity issues, such as mental health first aid, and

unconscious bias training. However, there was no planned training around LGBT issues or the development of guidance for the support of transgender staff. Equality training for new starters is mandatory, as are some equality training modules for managers. We found that staff were not generally aware of the council's equality objectives, although they had been in place since 2016. This could be addressed through the service planning process and with better internal communication via the intranet, team briefings and staff noticeboards.

Some staff feel well supported by their managers, but this is not consistent across the whole organisation. Concerns were raised with the peer team that HR policies on sickness, lateness, training opportunities and performance management are not being applied consistently by managers and this is contributing to a sense of inequality and resentment amongst some staff. We heard that some requests for reasonable adjustments from disabled staff are being treated as recommendations by managers and not measures they are required to take. BAME and disabled employees are still disproportionately involved in disciplinary and grievances procedures.

The Council has six equality staff networks covering women, disability, working carers, LGBT, BAME and mental health and wellbeing. They are robust, well supported and are really making a difference to equality in the organisation. Each network has a senior manager as a sponsor and each has a budget of £1,500. They also collaborate on events and other initiatives like the annual diversity conference. This intersectional work could be capitalised further to ensure the outcomes of people are improved. Members of staff network groups felt that their opinions were valued, that they were able to influence the development of policies and working practice. Staff networks say that they have been key to changing the conversations about mental health at LBC. The BAME group had developed their own booklet for its members and to raise awareness and myth bust across the organisation thereby improving relations between those who share a protected characteristic and those who do not. Network groups felt they were recognised for their contributions. Although being active in a network has been incorporated into appraisal processes, frontline staff were concerned that they are not always able to attend staff networks. More early warning about dates of meetings/events would help them to plan their attendance.

There are some examples of good HR practice that is contributing to equality in the Council. The organisation is Level 2 of "Disability Confident". It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter. The Council has a low gender pay gap of 1.6%. It goes beyond the pay gap legal requirements to also measure disability and ethnicity pay gaps. Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace. The apprenticeship scheme has been a very positive and well planned initiative. It has made good use of relationships with contractors. The scheme is deliberately accessible and has a high proportion of apprentices with a learning disability.

There are good industrial relationships with the Trade Unions and there are opportunities to harness the resources of the trade unions to positively contribute to the equality agenda. The trade unions could also be involved more in developing the council's work on equality and diversity.

It was not clear what arrangements there are for translators and interpreters to provide these services for customers engaging with council services. The Council may wish to explore whether it could use the language skills of its frontline and other staff to ensure quick access to interpreting and translation, whilst ensuring that proper arrangements remain in place when qualified and trained interpreters are required, including for Deaf people.

Recommendations

Undertake further investigation into the reasons why black male employees are still not progressing in the organisation at the same rate as their female counterparts and why BAME staff are over represented in the lowest quadrants of the appraisal results.

Consider ways to increase staff awareness of the council's equality objectives, possibly through the service planning process and internal communication via the intranet, team briefings and staff noticeboards.

Address the inconsistencies in the way HR policies such as sickness, lateness, training opportunities, performance management and reasonable adjustments are being applied by some managers across the organisation.

Ensure that frontline staff are able to attend staff networks, perhaps by giving more early warning about dates of meetings/events to help staff plan their attendance. Increase the opportunities for joint working between networks.

Review the use of translators and interpreters to ensure that the Council is using the most cost effective ways of providing these services.

4. Signposting to good practice elsewhere

Equality Impact Assessments

Rochdale Council has a robust system in place for ensuring that equality impact assessments are undertaken when required and for quality assuring these assessments. It implemented the Mod Gov electronic report management system in June 2014 which ensures that all reports meet Council requirements and are checked and signed off by Legal, HR, Equality, Finance and the Relevant Director of Service before the report proceeds to the relevant committee meeting. Ongoing advice and feedback is provided to managers on the quality of their equality impact assessments.

Contact: Rochdale Borough Council

Social Value Indicators

Good practice examples are Knowsley and Oldham Borough Councils.



Knowsley Social
Value Outcomes Matr

Incorporating equality into business planning



Management cycle
matrix.docx

Specific talent management programme for BME by HMRC and the University of Manchester example. They were both winners in the 2014 Race for Opportunity categories re: staff/workforce.

<http://raceforopportunity.bitc.org.uk/tools-case-studies/case-studies/awards-2014-developing-talent-award-progression-hm-revenue-customs>

<http://raceforopportunity.bitc.org.uk/tools-case-studies/case-studies/awards-2014-transparency-monitoring-and-action-award-university>

London Councils has produced an excellent report on the impact of changes to disability benefits on eligibility for Council services.

<http://www.londoncouncils.gov.uk/policylobbying/welfarereforms/resources/disabilitybenefitreform.htm>

Disability Rights UK has produced guidance for local authorities on inclusive communities and involving disabled people.

<http://www.disabilityrightsuk.org/sites/default/files/pdf/1%20%20InclusivecommunitiesLAguide.pdf>

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Croydon Council: Workplace Equality Index 2020 Feedback

Congratulations on taking part in Stonewall's 2020 Workplace Equality Index. As an employer that has taken the time to participate, you've demonstrated commitment to your LGBT staff and the wider LGBT community. In this report you will find feedback from Stonewall to help you plan your year ahead to drive forward LGBT inclusion in your workplace.

What this report contains

This report is specific to your organisation. It gives you the following information:-

- Your overall score
- Your overall rank, and rank within the local government sector
- Your performance on key questions for bi and trans staff
- Your scores in the ten sections of your submission
- A short qualitative summary of your performance in each section
- Comparison data for different groups of entrants:-
 - All entrants
 - Entrants in the local government sector
 - Top 100
 - Top 100 threshold: those ranked one hundred to eighty-five, typical of organisations newly entering the Top 100

Additional information will be provided to you on the staff feedback questionnaire that you sent to your employees:-

- How your employees responded to key questions about LGBT equality
- How employees of similar organisations in the local government sector and your region responded

How to use this report

Your Stonewall Account Manager will organise a feedback meeting with you to talk through the strengths and weaknesses of your current LGBT inclusion work, best practice and give you tips for action planning in the future. During this meeting, the Account Manager go through the work that is most relevant to your organisation.

You should use this report, along with the verbal feedback from your Account Manager to make the short and long-term changes necessary to drive inclusion in your workplace.

Score and rank

- Total score: 101.5
- Rank: 148th

- Local government sector rank: 15th
- Local government sector entrants: 33

- Bi inclusion score: 47%
- Trans inclusion score: 49%

Quick facts

- Over 500 organisations took part
- 109 820 people responded to the Staff Feedback Questionnaire

- The average Top 100 score is 137.5
- The average Top 100 Bi Inclusion Score is 67%
- The average Top 100 Trans Inclusion Score is 60%

Summary and overview

The below table gives you a summary of how you scored across the ten sections of the Workplace Equality Index.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local government | Top 100 | Top 100 Threshold Entrants |
|---|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|------------------|---------|----------------------------|
| 1 Policies and benefits | 11.5 | 15 | 15 | 3.5 | 3.5 | | 6.5 | 6.5 | 10.5 | 10.5 |
| 2 The employee lifecycle | 14.5 | 27 | 26 | 11.5 | 12.5 | | 10 | 11.5 | 17.5 | 15 |
| 3 LGBT employee network group | 11 | 22 | 22 | 11 | 11 | | 9.5 | 10.5 | 17 | 14.5 |
| 4 Allies and role models | 6 | 22 | 15.5 | 9.5 | 16 | | 7.5 | 8 | 14.5 | 13 |
| 5 Senior leadership | 11.5 | 17 | 17 | 5.5 | 5.5 | | 6 | 7 | 12.5 | 11 |
| 6 Monitoring | 6 | 21 | 12 | 6 | 15 | | 6 | 7 | 10.5 | 8.5 |
| 7 Procurement | 6 | 17 | 15 | 9 | 11 | | 4 | 6 | 10.5 | 8.5 |
| 8 Community engagement | 14 | 20 | 20 | 6 | 6 | | 9 | 12 | 15.5 | 13.5 |
| 9 Clients, customers and service users | 7 | 17 | 14 | 7 | 10 | | 6 | 6 | 12.5 | 9.5 |
| 10 Additional work | 2 | 2 | 2 | 0 | 0 | | 0.5 | 1 | 1 | 1 |
| Staff feedback questionnaire | 12 | 20 | n/a | | 8 | | 10.5 | 8 | 16 | 16 |

- **Your score** – the number of points allocated based on the answers and evidence provided
- **Total marks** – the number of points available in that section
- **Marks claimed** – the number of marks that your organisation claimed in the submission[†]
- **Marks claimed, not awarded** – the difference between marks claimed and your score
- **Marks available, not awarded** – the difference between marks available and your score
- **Averages** – mean averages of the scores awarded to...
 - **All entrants** – all organisations, over 500, who entered the Workplace Equality Index 2020
 - **Local government sector** – all organisations which entered in the local government sector
 - **Top 100** – all organisations which ranked in the Top 100 employers
 - **Top 100 Threshold** – all organisations which ranked between 100 and 85, the typical score of an organisation that is newly entering the Top 100

[†] If this number is less than your score this shows that the evidence you submitted is worth more points than you claimed

[†] Referred to in previous reports as 'self-score'

Section 1: Policies and benefits

This section examines the policies and benefits the organisation has in place to support LGBT staff. The questions scrutinise the policy audit process, policy content and communication.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local environment | Top 100 | Top 100 Threshold |
|-------------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------------------|---------|-------------------|
| 1 Policies and benefits | 11.5 | 15 | 15 | 3.5 | 3.5 | | 6.5 | 6.5 | 10.5 | 10.5 |

Feedback from your marker

Overall, there's some great work in this section and your policies are LGBT inclusive and consistently so. We need further evidence that the audit process ensures that language is gender neutral and explicitly inclusive of LGBT people in policies (beyond a standard EIA process).

In order to award for explicit bans on discrimination, bullying and harassment and to ensure you are inclusive of all Bi identities, we require explicit examples of homophobic, biphobic and transphobic incidents. The Stonewall 'Inclusive Policy Toolkit' can support with this.

Your notes

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Stonewall opportunities

Best practice guides are available to you, as a Stonewall Diversity Champion for free. Talk to your account manager about how to best use these resources.

Open programmes are available for up to three people from Croydon Council to attend. Trans allies is available in [London on the 28th of April](#) and in [Liverpool on the 25th of June](#). Open Programmes are available as part of the Scotland Empowerment Week from [18th to 22nd May in Scotland and the north-east of England](#).

Section 2: The employee lifecycle

This section examines the employee lifecycle within the organisation; from attraction and recruitment through to employee development. The questions scrutinise how you engage and support employees throughout their journey in your workplace.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local government | Top 100 | Top 100 Threshold |
|---------------------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|------------------|---------|-------------------|
| 2 The employee lifecycle | 14.5 | 27 | 26 | 11.5 | 12.5 | | 10 | 11.5 | 17.5 | 15 |

Feedback from your marker

Provision of all-employee training at high rates is good, but some materials are potentially harmful, reinforcing gender binary stigmas against non-binary people, and are bi-exclusionary. It is also useful to include content warnings when slurs are used in communications, even as examples. Anti-discrimination training must make reference to both gender identity and sexual orientation, and not leave participants to join the dots.

In general, it is important to check all communications for trans-exclusionary, bi-exclusionary, and non-binary-exclusionary content.

We would like to see comprehensive information provided at application stage on the organisation's LGBT inclusion commitment and network.

Your notes

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Stonewall opportunities

London Workplace Conference is on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Cymru Workplace Conference is on the 14th of February. [Tickets are available](#) for £110+VAT for public-sector organisations. Tickets can be bought on a buy-three-get-one-free basis.

Global dial-in tickets for London Workplace Conference [are available](#) for £50 (or three for £120), with discounts available to Global Diversity Champions.

Workplace Allies is an empowerment programme which [can be booked](#) to be run in-house for up to 36 delegates from Croydon Council.

Stonewall Workshops are available, on topics such as bi inclusion, trans inclusion, allyship, and leadership. Email conference@stonewall.org.uk.

Section 3: LGBT employee network group

This section examines the activity of your LGBT employee network group. The questions scrutinise its function within the organisation.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local government Top 100 | Top 100 Threshold | |
|-------------------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|--------------------------|-------------------|------|
| 3 LGBT employee network group | 11 | 22 | 22 | 11 | 11 | | 9.5 | 10.5 | 17 | 14.5 |

Feedback from your marker

The LGBT network is clearly both active and inclusive. Good work has been put into bi inclusion and trans inclusion.

Unfortunately, a lot of marks were lost here due to not updating the register of network group activity from last year, so almost all your examples were out of the date range. It is likely that the organisation would have scored highly here.

One issue to raise from the events listed in the 17/18 submission cycle is that bi-exclusionary events (e.g., lesbian or gay men-only) events are not best practice and can easily undo a lot of good bi inclusionary work.

There are some easy to fix issues, to use best-practice terms 'bi' rather than 'bisexual', 'ally' rather than 'heterosexual ally', and 'trans' rather than 'transgender', and to make an explicit statement of non-binary inclusion, possibly expanding the number of elected reps to include a non-binary rep.

Your notes

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Stonewall opportunities

Workplace Allies, Workplace Trans Allies and Workplace Role Models are empowerment programmes which [can be booked](#) to be run in-house for up to 36 delegates from Croydon Council.

LGBT Network Group Masterclass is available in June in Birmingham (email conference@stonewall.org.uk to reserve your place) and on [24th of April in Scotland](#).

Section 4: Allies and role models

This section examines the process of engaging allies and promoting role models. The questions scrutinise how the organisation empowers allies and role models and then the individual actions they take.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|--------------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 4 Allies and role models | 6 | 22 | 15.5 | 9.5 | 16 | | 7.5 | 8 | 14.5 | 13 |

Feedback from your marker

This section explores the organisation's work around empowering allies to be active in their support of the LGBT community, and empowering LGBT role models to be visible and inspire others.

Profiles should state the identities of the profilees, and look to profile a wider range of identities, including bi, non-binary and trans identities.

Stonewall can support with developing this area, through creating allies campaigns and programmes, and providing best practice examples of other organisations' role model profiling.

Unfortunately, again in this section there were answers without the date provided and examples that were out of the date range – so we couldn't award. For example, none of your role model profiles included specific dates which we clearly ask for.

Your notes

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Stonewall opportunities

Inclusive Future Leaders is a tailored programme designed to form part of a graduate or management training programme, which [can be booked](#) in-house at Croydon Council.

Workplace programmes including [LGBT Role Models](#), [Allies](#) and [Trans Allies](#). They are available as open programmes for up to three people or the programmes can be booked to be run in-house for up to 36 delegates from Croydon Council. Open Programmes are available as part of the Scotland Empowerment Week from [18th to 22nd May in Scotland and the north-east of England](#).

Inclusive Leadership is a newly developed programme which will be made available from May, email empowerment@stonewall.org.uk for more information.



Section 5: Senior leadership

This section examines how the organisation engages senior leaders. The questions scrutinise how the organisation empowers senior leaders at different levels and the individual actions they take

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|---------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 5 Senior leadership | 11.5 | 17 | 17 | 5.5 | 5.5 | | 6 | 7 | 12.5 | 11 |

Feedback from your marker

There is a highly commendable degree of engagement, particularly at the SMT level, on both general LGBT topics and trans- specific topics.

Next steps are to further engage the board (Council & Cabinet) in LGBT inclusion, particularly in a visible way. It would also be useful to start on some bi-visibility specific work, where the organisation has no submitted work.

Your notes

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Stonewall opportunities

LGBT Leadership is an empowerment programme for LGBT leaders. Our [next open programme](#) is in London 15th to 17th of July, and can be [booked to be run](#) in-house for Croydon Council.

Inclusive Leadership is a newly developed programme which will be made available from May, email empowerment@stonewall.org.uk for more information.

Section 6: Monitoring

This section examines how the organisation monitors its employees. The questions scrutinise data collection methods, analysis and outcomes.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|--------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 6 Monitoring | 6 | 21 | 12 | 6 | 15 | | 6 | 7 | 10.5 | 8.5 |

Feedback from your marker

Monitoring is both vital for understanding lesbian, gay, bi and trans (LGBT) employees and their needs. It is vital in this analysis not to conflate LGBT identities. Sexual orientation is distinct from gender identity, and trans people can be straight. It is also important not to conflate being LGBT with being lesbian or gay, and doing so is bi erasure which is a form of biphobia.

The question on sexual orientation is not currently best practice, Stonewall monitoring resources can support with this.

The question currently asked for 'Gender' should be changed as a matter of priority to reflect good practice.

We would like to see staff satisfaction data cut across sexual orientation and gender identity data to ensure the organisation knows whether LGBT staff experiences are worse, the same or better than non-LGBT staff, and for sexual orientation and gender identity to be monitored across pay grades.

Your notes

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Stonewall opportunities

Best practice guides are available to you, as a Stonewall Diversity Champion for free. Talk to your account manager about how to best use these resources.

London Workplace Conference includes a session on monitoring. It is held on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.



Section 7: Procurement

This section examines how the organisation affects change in its supply chain. The questions scrutinise the steps taken to ensure LGBT inclusive suppliers are procured and held to account.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|---------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 7 Procurement | 6 | 17 | 15 | 9 | 11 | | 4 | 6 | 10.5 | 8.5 |

Feedback from your marker

Training or guidance given to the procurement team should explicitly include LGBT equality in relation to procurement processes.

Pro-active scrutiny of policies, not just self-certification, is needed for scrutinising potential suppliers' documentation.

Working with local businesses, even outside of the supply chain, is an excellent initiative and very commendable work.

Your notes

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Stonewall opportunities

Best practice guides are available to you, as a Stonewall Diversity Champion for free. Talk to your account manager about how to best use these resources.

London Workplace Conference includes a session on procurement. It is held on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Section 8: Community engagement

This section examines the outreach activity of the organisation. The questions scrutinise how the organisation demonstrates its commitment to the wider community and the positive impact it has.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|------------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 8 Community engagement | 14 | 20 | 20 | 6 | 6 | | 9 | 12 | 15.5 | 13.5 |

Feedback from your marker

The organisation has a widespread and effective external collaboration strategy. It would be great to see documentation of bi and trans-specific work.

It would also be good to start seeing documentation of outcomes in this area: looking at participant feedback or reach of communications.

It would also be good to see an expansion of the existing good working, enhancing it's impact.

Your notes

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Stonewall opportunities

Your **Stonewall account manager** can advise on how to maximise your impact with community engagement.

London Workplace Conference includes a session on community engagement. It is on the 3rd of April.

[Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Section 9: Clients, customers and service users

This section examines how the organisation engages with clients, customers, services users or partners.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|--|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 9 Clients, customers and service users | 7 | 17 | 14 | 7 | 10 | | 6 | 6 | 12.5 | 9.5 |

Feedback from your marker

Consultations on service delivery must include specific out-reach to L, G, B & T people: the Stonewall 'Service Delivery Toolkit' can support with this.

Training provided for staff delivering frontline services needs to be brought in line with best practice on trans inclusion. Stonewall can support with this. General D&I training can be insufficient without examples of HBT discrimination.

It is important to identify and address issues that LGBT service-users may have and barriers they may face in accessing services. We recommend that organisations monitor their client and customer base to improve their reach and impact, and that frontline staff are trained on reducing bias and discrimination towards LGBT service-users.

Your notes

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Stonewall opportunities

London Workplace Conference is on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Cymru Workplace Conference is on the 14th of February. [Tickets are available](#) for £110+VAT for public-sector organisations. Tickets can be bought on a buy-three-get-one-free basis.

Section 10: Additional work

This section gives outstanding employers an opportunity to share best practice not already awarded elsewhere in the submission.

| Section | Your score | Total marks | Marks claimed | Marks claimed not awarded | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|--------------------|------------|-------------|---------------|---------------------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| 10 Additional work | 2 | 2 | 2 | 0 | 0 | | 6 | 1 | 12.5 | 9.5 |

Feedback from your marker

The LGBT+ Allies network engaging with service users in an area disproportionately patronised by LGBT people is highly commendable. This is very pro-active work within the community and links your organisation's corporate work with the community work of your organisation's stakeholders. Other claimed activities fall within the areas already claimed by the organisation.

Your notes

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Stonewall opportunities

Many organisations have innovative ideas for LGBT inclusion. The Stonewall Empowerment Team can work with you to design bespoke and tailored events, workshops, webinars and programmes. Email empowerment@stonewall.org.uk to discuss your ideas.



Staff Feedback Questionnaire

This section examines the policies and benefits the organisation has in place to support LGBT staff. The questions scrutinise the policy audit process, policy content and communication.

| Section | Your score | Total marks | Marks available not awarded | Averages | All entrants | Local | Top 100 | Top 100 Threshold |
|------------------------------|------------|-------------|-----------------------------|----------|--------------|-------|---------|-------------------|
| Staff feedback questionnaire | 12 | 20 | 8 | | 10.5 | 8 | 16 | 13.5 |

Stonewall opportunities

Stonewall Workplace Conferences have expert workshops and unique networking opportunities. This gives you the holistic tool to deal with the diverse and varied issues that your LGBT staff and their allies face. London Conference is on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations. Cymru Conference is on the 14th of February. [Tickets are available](#) for £110+VAT for public-sector organisations. Tickets can be bought on a buy-three-get-one-free basis.



Your priorities

This is a space for you, in collaboration with your account manager, to set objectives for the year ahead.

| Your Priorities | What would success look like in a year? | What is a six-month milestone? | What resources or senior buy-in do you need? | What specific steps can be taken to achieve it? |
|---|---|---|--|---|
| E.g., improve the working environment for bi employees | <i>E.g., increase by 50% the number of bi employees who are comfortable to disclose to colleagues</i> | <i>E.g., three intranet campaigns raising awareness of bi issues with clear opposition to biphobic discrimination</i> | <i>E.g., agreement from internal communications and agreement from the Head of D&I</i> | <i>Organise meetings with the Heads of Internal Communications & D&I Write copy for the first intranet post</i> |
| Priority one: | | | | |
| Priority two: | | | | |
| Priority three: | | | | |



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For General Release

| | |
|------------------------|---|
| REPORT TO: | CABINET 8th JUNE 2020 |
| SUBJECT: | Children, Young People & Families Plan |
| LEAD OFFICER: | Robert Henderson, Executive Director of Children, Families and Education |
| CABINET MEMBER: | Councillor Alisa Flemming, Cabinet Member for Children and Young People |
| WARDS: | All |

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

Children, Young People and Families are at the heart of all of the Council's corporate priorities. The recommendations contained in this report aim to deliver against multiple priorities in our [Corporate Plan for Croydon 2018-2022](#), including but not limited to:

- Children and young people in Croydon are safe, healthy and happy, and aspire to be the best they can be;
- Every child and young person can access high quality education and youth facilities;
- Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them;
- Croydon becomes a more equal place;
- Happy, healthy and independent lives are lived by as many as possible, for as long as possible, and;
- Access to effective health services and care services when needed.

Ultimately this should help us to ensure the following outcomes:

1. ***“Our children and young people thrive and reach their full potential”***;
2. ***“People live long, health, happy and independent lives”***, as our children and young people transition into adulthood.

FINANCIAL IMPACT

Whilst there are no direct financial implications arising from the Children, Young People and Families Plan, the plan details existing commitments, projects and actions, including those outlined in the Corporate Plan.

The purpose of the plan is to provide a joined up strategic partnership vision for children and young people across the borough, reiterating our commitment, and aligning our resources and strategic priorities. Across the Children and Families Partnership.

Any specific proposals with implications for the Council's revenue budgets, or requiring capital investment, will need to be reviewed and approved via the appropriate approval route ahead of implementation.

FORWARD PLAN KEY DECISION REFERENCE NO.: N/A

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1. Refer the adoption of the Children, Young People and Families Plan to Full Council with a recommendation for approval.
- 1.2. Note the engagement and consultation that has been undertaken to develop this plan with children and young people, in addition to our partners, and organisations working with children and young people in Croydon.

2. EXECUTIVE SUMMARY

- 2.1 The Council has undertaken a review of the priorities for children and young people across Croydon's Local Strategic Partnership including key stakeholder groups. This review has been carried out in collaboration with Croydon's Children and Families Partnership Board and in engagement and consultation with Croydon's children and young people. The purpose of the review was to map existing priorities and identify a shared set of outcomes, priorities and success measures across the partnership, behind which resources and activity can be aligned to improve outcomes for children, young people and families in Croydon.
- 2.2 This report reflects the outcome of our review and details a proposed Children, Young People and Families Plan to tackle some of our key challenges, and to provide accountability to our children and young people. Our ultimate ambition is to deliver outstanding outcomes for children and young people, and deliver on the things which they told us matter most to them; including safety, health and learning.

3. DETAIL

- 3.1 Local Strategic Partnerships (LSP) are non-statutory public, private and voluntary and community sector partnerships. Croydon's LSP operates at a level which enables strategic decisions to be made, as well as enabling us to work collaboratively to tackle wicked societal issues in the local area. This can include tackling key issues for local people such as crime, jobs, education, health and housing which all require a range of local organisations working together towards better outcomes.

- 3.2 Croydon's Children and Families Partnership is responsible for mobilising partners (including the voluntary sector) to improve outcomes for children, young people and families in Croydon. Given the breadth of services for children and families, as well as growing demand and increasingly complex needs of our children and young people in the borough, it's crucial that we align our priorities for delivery and better align our resources.
- 3.3 Nationally, the three statutory safeguarding partners are the Local Authority, Chief Officers of Police, and Clinical Commissioning Groups. These organisations take ultimate responsibility for the safeguarding agenda for our children and young people. However it is the collective responsibility of all organisations working with children and young people, taking a multi-agency approach, to deliver positive outcomes and that the information sharing process is effective in achieving this – noting that there are existing data sharing procedures in place with children's services and with partners. Croydon Safeguarding Children Partnership (CSCP) is the statutory body that brings together local agencies that work to safeguard and promote the welfare of children and young people up to the age of 18 in the borough.

Early Help and Children's Social Care Improvement

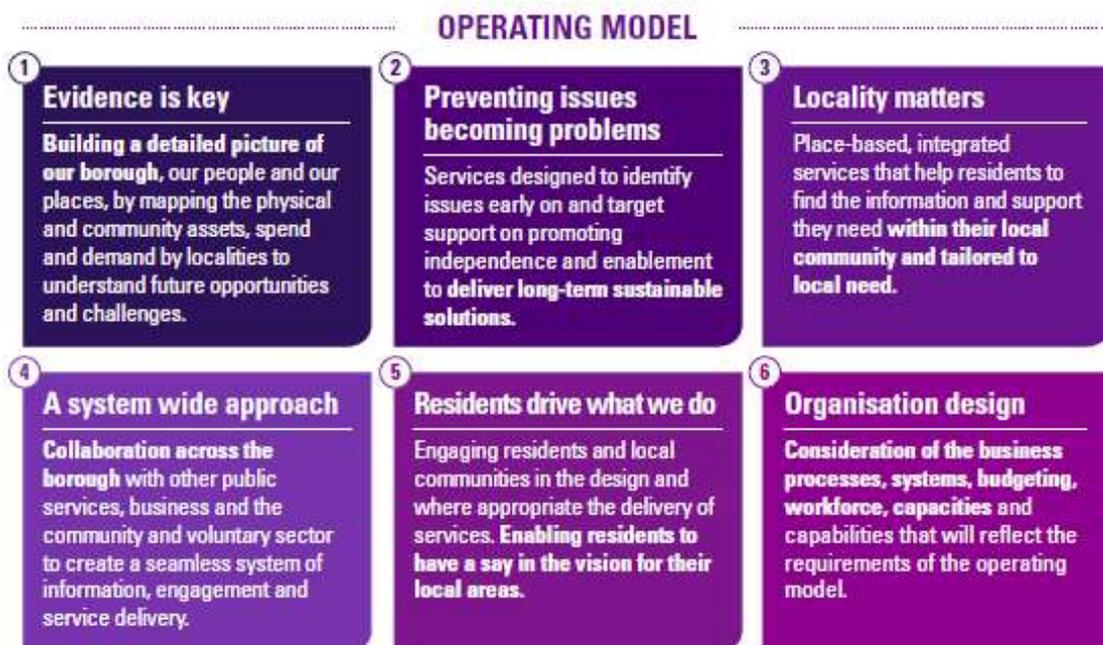
- 3.4 Early Help and Children's Social Care Services in Croydon have been on a journey of improvement since 2017, supported by the wider council and key partner agencies (police, schools and health). Services were subject to a full re-inspection by Ofsted in February 2020 and are now judged 'good' overall. The full Ofsted report was published on Ofsted's website on March 16th 2020.
- 3.5 It is important that we capitalise on the momentum of the Children's Improvement Programme and continue to mobilise council and partnership support to improve outcomes for all children and young people in Croydon. To support improvement activity across the Children, Families and Education Directorate the Executive Director set out a clear departmental vision in spring 2019 (the 'destination') underpinned by 4 work streams (the 'how') and a set of principles (the 'values that guide us'). These are set out in the pictures below. Wherever possible, a similar approach will be taken to delivering on the priorities in the Children, Young People and Families plan to ensure that approaches to delivery are consistent across the partnership, so that children and families receive seamless support from professionals.

Children, families and education principles



Taking a 'localities approach'

- 3.6 As a borough, we're looking at how we deliver services closer to where residents need them. This about taking a 'localities approach' to deliver services differently, in each local area based on a diverse range of identified needs. This is an important consideration in how we will deliver on the priorities set out in our Children, Young People and Families Plan. A number of council services are already delivered in a locality model, including Early Help and we will build on what works here to join up with partners locally (e.g. through colocation) to provide wrap around support to families.



Importance of working in partnership

- 3.7 Given the current financial context, and the challenges that the public and voluntary sectors face nationally as well as locally, it's more important than

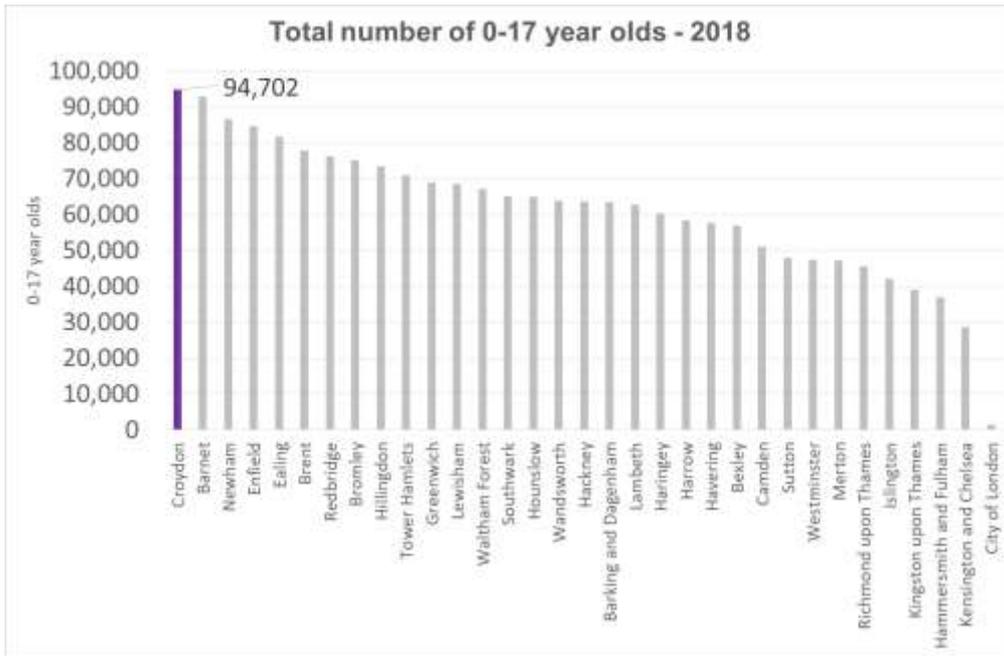
ever to make sure that we're delivering improved outcomes for children, young people and families in the most efficient way possible; pooling resources and expertise wherever we can. We are experiencing continuous increase in demand for services in addition to population growth, and changing requirements. This means we need to be more preventative, and proactive in our approach.

- 3.8 Fragmented provision of services creates inefficiencies, potential duplication and risks disengagement by children and their families from services such as GPs, education and wider voluntary and community specialist support. It also creates a risk that we miss something, where information is not shared effectively. From the experience of a service user (e.g. a young person parent) it can also be a frustrating experience to have multiple professionals involved in their lives and tell their stories again and again to access help and support.
- 3.9 By aligning our delivery as a partnership, we are better positioned to share high level or anonymised intelligence to assist with the decision making process, as well as to better align current resources and invest future resources in a much more collaborative way. It's not about everyone doing everything, but about any professional intervening at the earliest opportunity (first point of contact) and where possible, a child or young person having a single point of contact ('tell us once' approach). This Children, Young People and Families Plan and the mapping work that has been undertaken to create it (across different partner plans) will help to support partnership working by articulating a clear set of outcomes and priorities that we will work towards together.

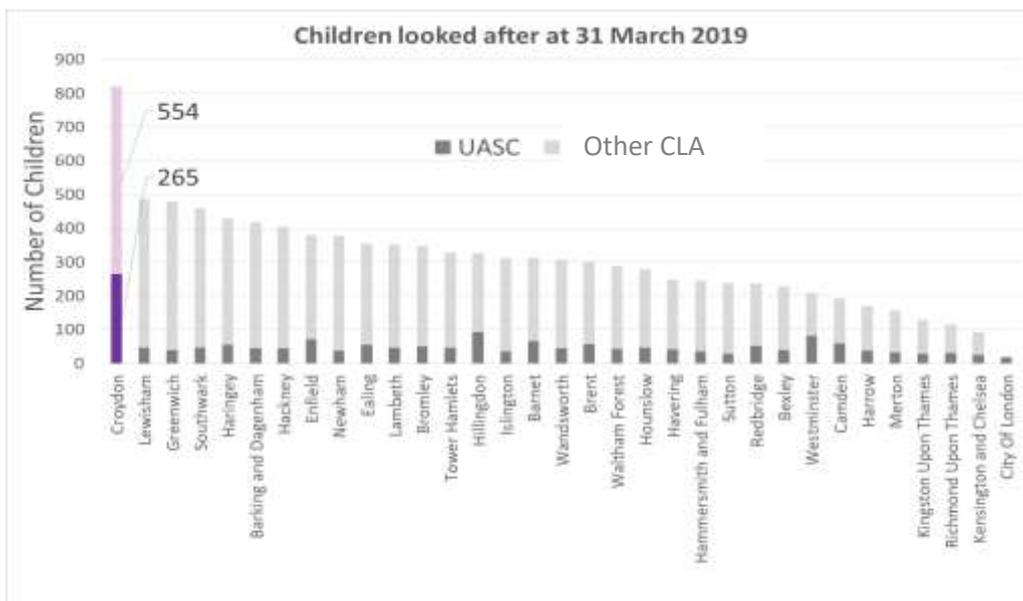
What does the evidence tell us?

- 3.10 We know that there are some serious challenges in Croydon, and nationally, that can only be tackled through using a targeted approach in partnership. Some of our key challenges are highlighted below:
- 3.11 Croydon has the largest population of 0-17 year olds in London:¹

¹Link to data source: <https://www.nomisweb.co.uk/>

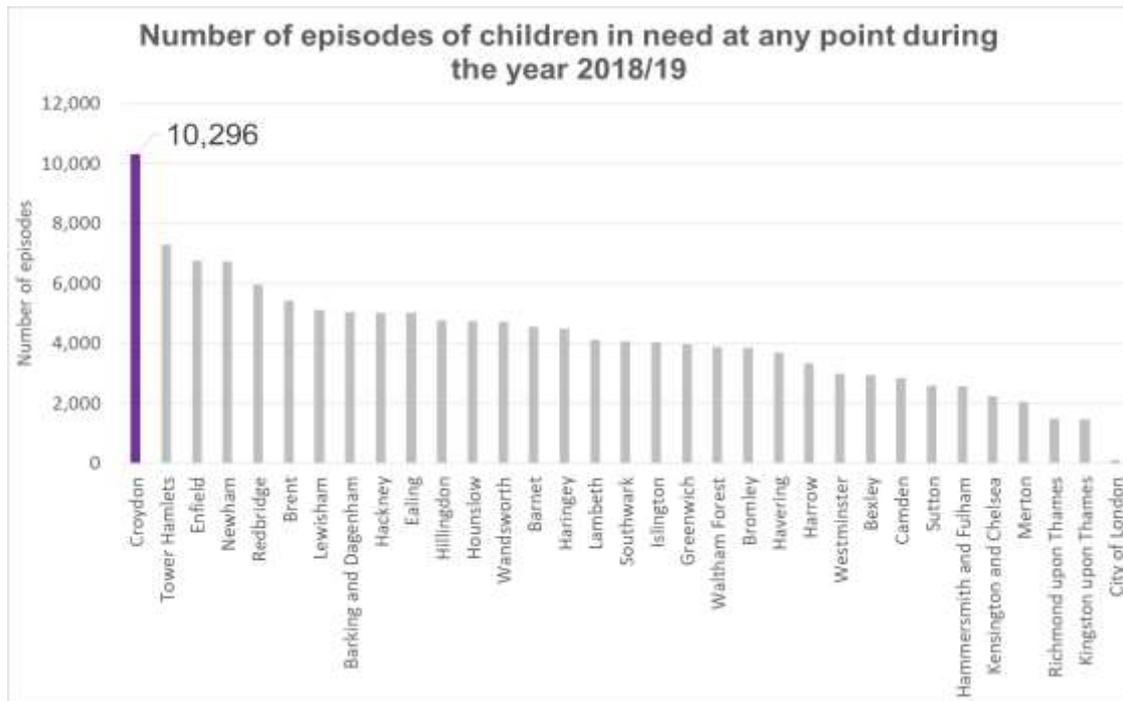


3.12 Croydon has the highest number of Children looked After in London²:

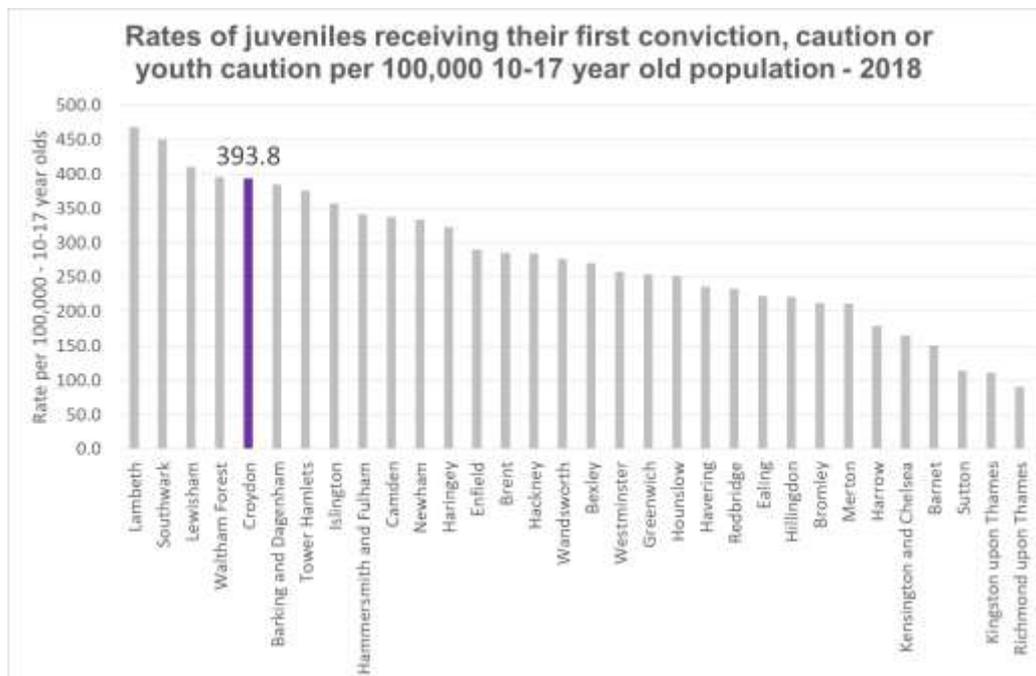


² Link to data source: <https://www.gov.uk/government/collections/statistics-looked-after-children>

3.13 Croydon had the highest number of episodes of children in need in London at any point during 2018/19³:



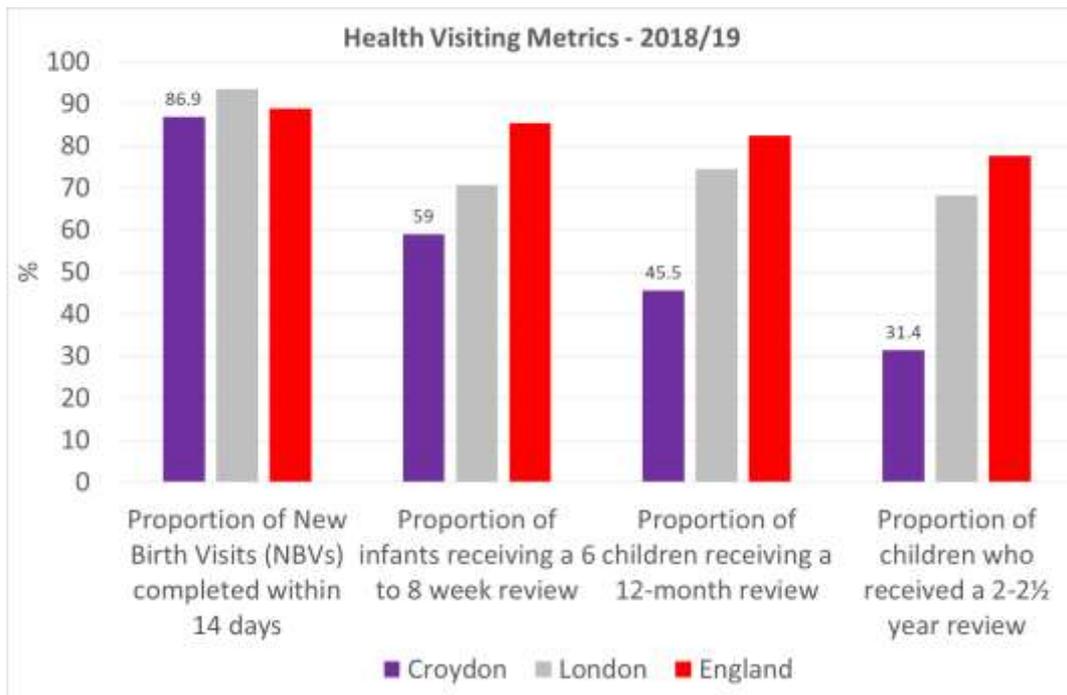
3.14 Croydon has the 5th highest rate (in London) of first time entrants into the youth justice system⁴:



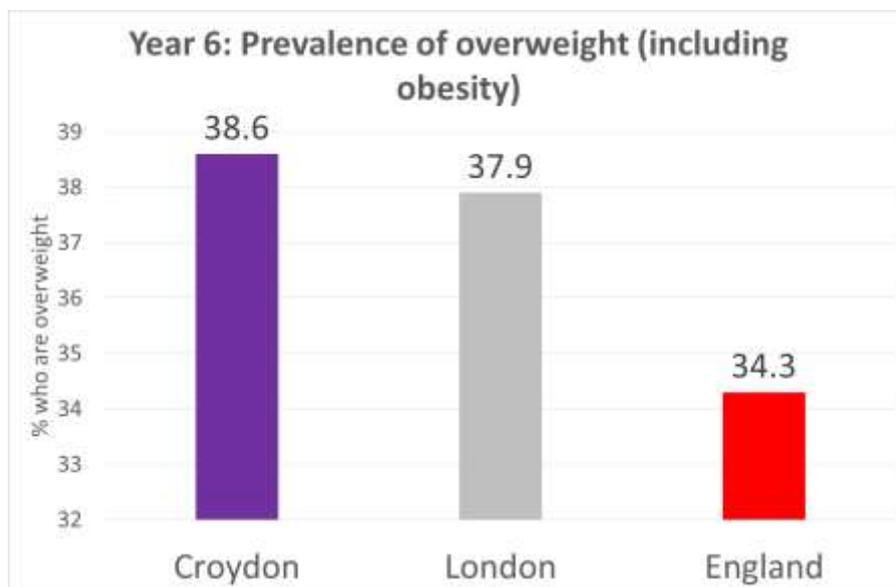
³ Link to data source: <https://www.gov.uk/government/collections/statistics-children-in-need>

⁴Link to data source: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2018>

3.15 31.4% of children in Croydon received a 2-2½ year review by a health visitor. This is the lowest rate in London⁵.



3.16 38.6% of year 6 children in Croydon are overweight. This is the 13th highest rate in London⁶:



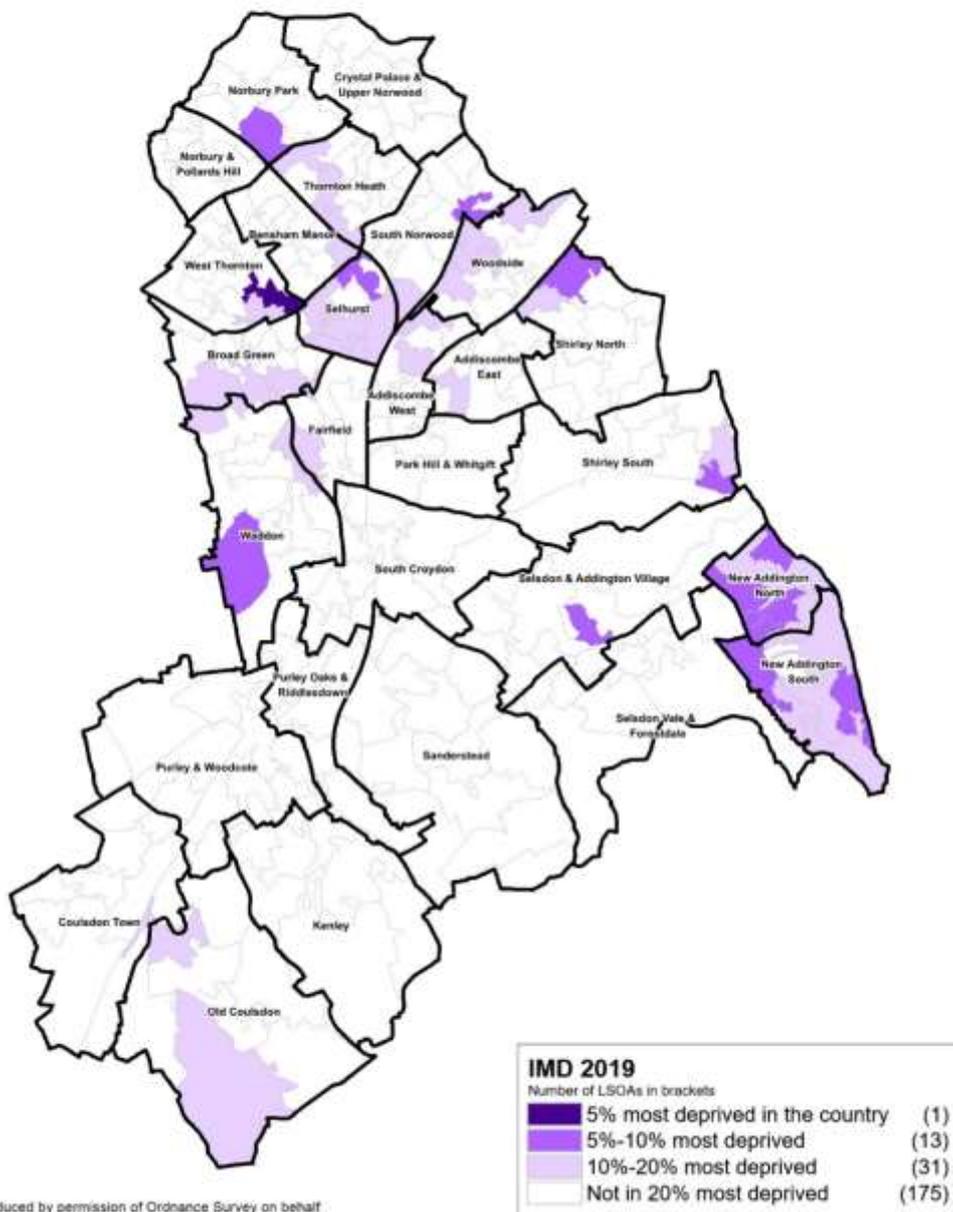
⁵ Link to data source: <https://www.gov.uk/government/collections/child-and-maternal-health-statistics#health-visitor-service-delivery-metrics>

⁶Link to data source: <https://digital.nhs.uk/services/national-child-measurement-programme/>

3.17 The map below shows income deprivation among children in Croydon.

- Croydon is the **14th** (out of 33) most deprived London Borough (Income affecting children) (17th in IMD 2015)
- **485** (0.5%) 0-17 year olds in Croydon live amongst the 5% most deprived area in the country. This LSOA is **the most deprived in London** and 75th out of 32,844 in the country.
- **23,335** (24.6%) 0-17 year olds in Croydon live amongst the 20% most deprived area in the country

Indices of Deprivation 2019
Income deprivation among children index (IDACI)
Croydon Lower Super Output Areas (LSOAs)



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4. DEVELOPMENT PROCESS

4.1 Prior to the development of this draft plan, and throughout engagement, research has been undertaken to identify best practice. The following local authorities' plans and strategies were reviewed and considered in this process:

- South Gloucestershire Council
- Royal Borough of Kensington & Chelsea, City of Westminster Council
- Lambeth Council
- Leeds City Council
- Manchester City Council
- Richmond Council
- City of London
- Barnet Council
- Liverpool Council
- Bradford Council

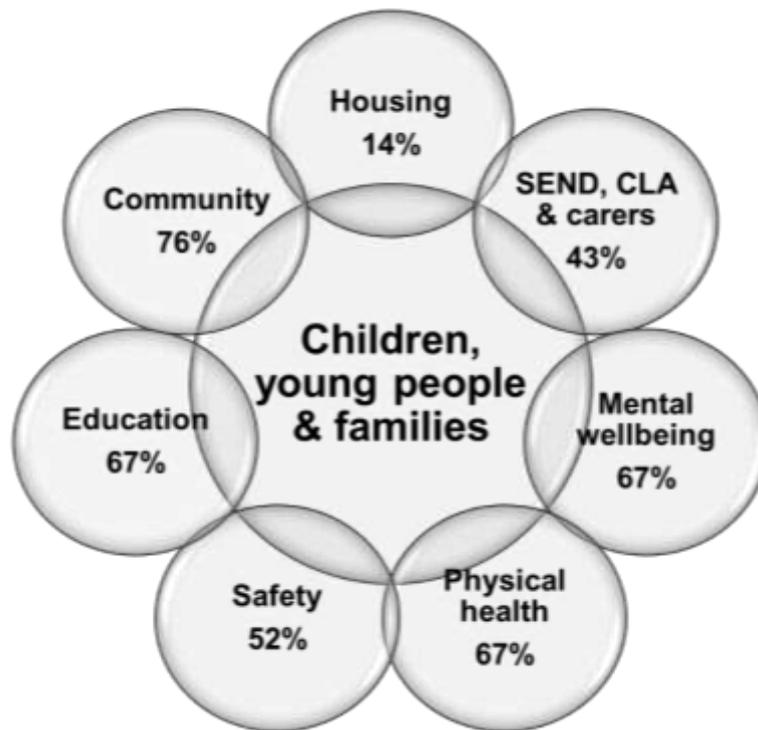
Mapping existing strategic priorities

4.2 In order to identify synergies and opportunity for join up, we began by reaching out to partners and key organisations involved with children and young people across the borough.

4.3 Initially we asked for a survey to be completed - we asked partner organisations to provide us with detail of their vision, priorities, and intended outcomes for children and young people in Croydon. An online survey was circulated to internal agencies and external partners to begin the mapping process:

- *Please outline your organisation's vision statement for children, young people and families;*
- *Please outline the outcomes that your organisation hopes to achieve for children, young people and families;*
- *Please outline the priorities that you plan to deliver for children, young people and families;*
- *Please detail the actions that you take to deliver against your priorities for children, young people and families;*
- *Detail the success measures that you have in place to know that you've been successful.*

4.4 This information helped us to create a really clear map of themes to discuss with children and young people. 21 individuals from 14 organisations responded to the survey; we were then able to condense the information received into the following seven broader themes:



7

- 4.5 In addition to the responses received, we were also able to identify key priorities from existing strategies and plans, including our Children’s Plan for Improvement, [Croydon’s Early Help Delivery Plan](#) (previously strategy), [Croydon’s Health and Wellbeing Strategy](#), [Health and Care Plan](#), Youth Congress Report and [Croydon’s SEND Strategy](#).

Engagement with Croydon’s Children and Young People

- 4.6 By following this process, it provided the foundations to test whether we’re focussed on the right areas with our children and young people. We were particularly interested in understanding how our children and young people felt about the things that we’re focussed on – we wanted to understand how important they felt our priorities are, and vitally – whether we’re missing anything. This part of the process was about understanding whether the priorities we’re working towards in Croydon are in line with the expectations and needs of our children and young people.
- 4.7 To ensure that the plan being created has meaningful impact, an engagement plan was created to carry out sessions across education provisions within the borough. All schools and Pupil Referral Units were contacted and offered the opportunity to participate.
- 4.8 In total 20 sessions across 16 educational provisions in the borough were carried out, with an average of 5-15 students in each session. In total, we were able to engage with around 200 children and young people over a three week period.

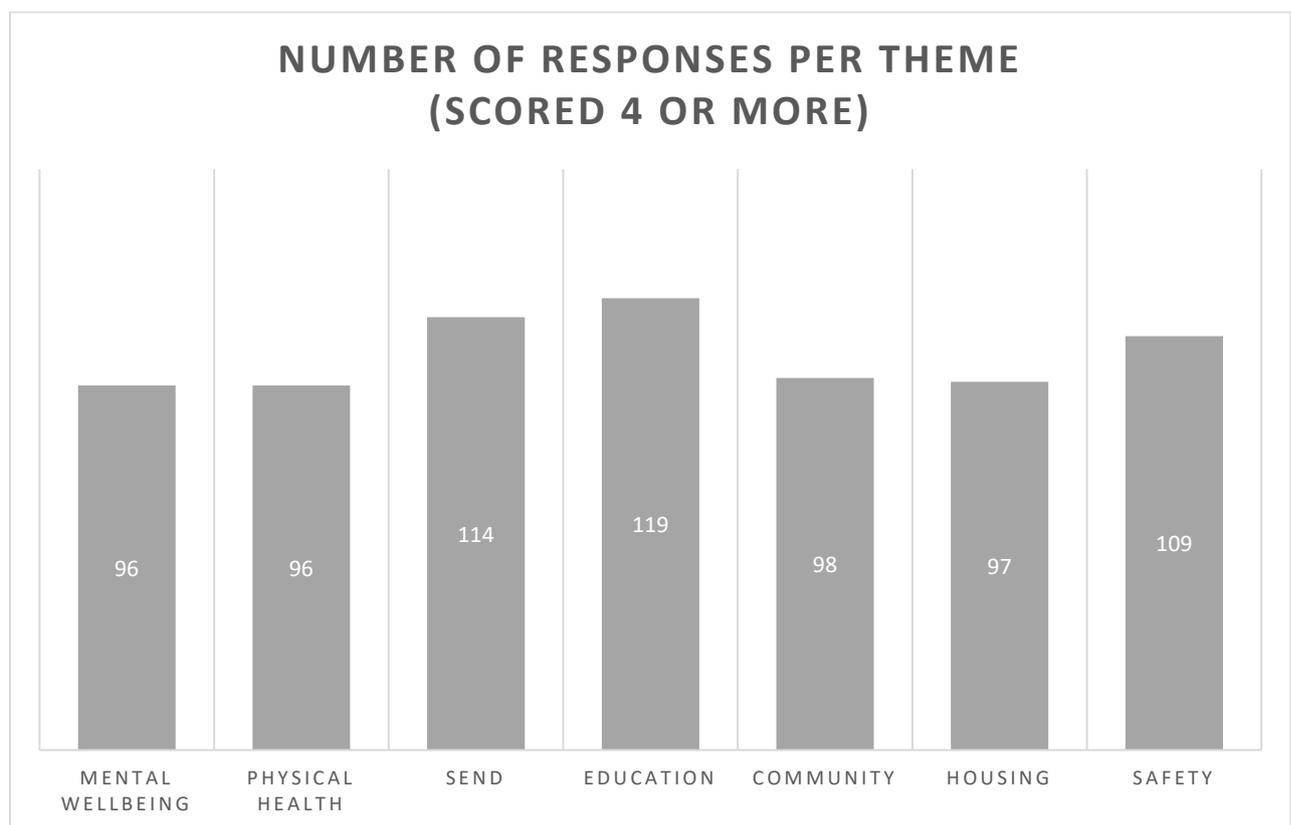
⁷ The figure represents the percentage of the 21 organisations that responded, with this area as a key priority.

4.9 To make sure that the engagement had broad audience capture, engagement was carried out at a range of different schools and provision, with different focus groups, including:

- Early years drop-in centres
- Primary schools
- Co-ed secondary schools
- Single-sex secondary schools
- Pupil referral units
- Special educational needs schools (primary and secondary)
- Colleges
- Voluntary sector organisations

4.10 The aforementioned seven themes identified in the priority mapping process were tested with children and young people in an age appropriate manner. All participants were asked to rate each of the seven themes by importance on a scale of one to five; a score of one indicated that the theme was not important and a score of five indicated that the theme was extremely important.

4.11 The following chart shows the responses received:



4.12 The data was interpreted as confirming the importance of the seven broad themes.

4.13 In many cases, the feedback received from children and young people for each theme was similar across the different educational provisions. Within each theme, certain issues arose repeatedly. A broad summary is captured below:

Mental Health:

Amongst certain groups the lack of mental health provision in schools was raised as a key challenge. In contrast, some groups felt that mental wellbeing was the responsibility of the individual and demonstrated a reluctance to rely on Council or partner services. In some sessions, there was a notable difference in attitude towards mental health problems between male and female participants. Some participants stated that anti-depressants were prescribed too readily to young people.

Physical Health:

The majority of children and young people claimed that an individual's physical health was their own responsibility and few participants believed that their physical health was the responsibility of the council or other partner organisations. Many groups identified a link between physical health and mental health, yet there was disagreement regarding whether one was more important than the other. Chicken shops were identified as a specific problem by young people and some individuals stated that more should be done to ensure healthy food is as cheap as fast food. Some reference was made to the provision of child-friendly, low-cost gyms.

Special Educational Needs & Disabilities (SEND):

It was felt by many children and young people that SEND provision in mainstream schools was not good enough. Those in special educational needs schools stated that they had experienced bullying in mainstream schools and had felt particularly unsupported, as though mainstreams schools were ill-equipped to handle children and young people with SEND. Other young people explained that learning disabilities such as dyslexia and dyspraxia were not spotted early enough, and more could be done to educate all children and parents on these types of needs.

Education:

Several references were made to unsatisfactory teaching in schools, and some young people cited this as the cause of their bad behaviour. Particularly, several participants mentioned that the 'standard' teaching style was not suited for those with additional needs or behavioural issues. Several participants, particularly those in primary schools, stated that there was not enough discipline in schools and other pupils' bad behaviour disrupted lessons which then impacted on their ability to learn.

Contrastingly, in sessions with older children, reference was made to pupils being disciplined for trivial reasons, such as small uniform violations. Increasing diversity in the curriculum was referenced across multiple sessions (for example, a greater focus on black history), and many groups stated that they would like to increase the vocational training provision in schools, and remove the reliance on Pupil Referral Units.

Community:

All groups questioned what was meant by the term 'community'. Some children identified their families, teachers and schools as their communities, whilst many older children claimed that their community was their 'inner circle' of friends or family. Several children and young people were initially reluctant to consider the impact their wider environment has on them. Reference was made to the importance of knowing your neighbours, and the relationship between community and safety. Older participants referenced a lack of community centres and activities for young people. Once each group had agreed upon their definition of community, most groups agreed that not having a community would be detrimental, and some groups suggested that the community could do more to help with things like mental health and safety.

Safety:

The majority of participants referenced knife crime and youth violence, even in primary schools. Younger children stated that adult supervision and the presence of teachers made them feel safe. Several young people stated that they were responsible for their own safety; some groups stated that they felt safe in Croydon, and the borough is safer than some people believe. The majority of young people stated that the police did not make them feel safe, and they do not trust them. Some individuals claimed that this was because they believed the police were homophobic, or transphobic. Others stated that this was because the police were racist, and recalled negative interactions with police officers. When asked how they would do things differently, most groups struggled to provide a response.

Housing:

References to Croydon's homeless population and the number of new homes being built in the borough were made during several sessions. Some children and young people stated that the government was not doing enough to end homelessness. References to housing instability and the disruption this causes children and young people were made in a number of sessions. Older participants stated that they wanted to move out of their family homes but expressed concern that property prices and rent were too high. Others mentioned that they don't know enough about the process for buying or renting a property, and express an interest in learning more about the process in advance of leaving full time education.

4.14 During the sessions, the children and young people were given an opportunity to raise any issues they felt were missing from our priorities and had not been discussed. These included:

- Brexit
- Sustainability and climate change
- Diversity in the curriculum
- Better addressing bullying in schools
- Enabling young people to influence decisions

- More opportunities for all children and young people

Having received this feedback, where possible and appropriate these issues have subsequently been addressed in the draft Plan.

- 4.15 Following engagement, we drafted the following outcomes and supporting priorities to form the basis of the plan:

OUTCOMES: All children and young people in Croydon:

- 1 Are supported to do well & access learning
- 2 Feel safe in their homes, schools & communities
- 3 Have good mental and physical health

PRIORITIES:

- 1 Narrow the **attainment** gap for children & young people
- 2 Support children & young people into adulthood and work
- 3 Build relationships with families to ensure a safe, happy & caring home
- 4 Help young people feel safer by addressing the causes and impact of exploitation and youth violence
- 5 Reduce the impact of negative childhood experiences and trauma
- 6 Make improvements to emotional wellbeing and mental health services

- 4.16 These outcomes and priorities have been included in the attached draft plan (see appendix 1).

- 4.17 In addition to asking the participants how they felt about each of the topic areas, they were also asked about the look and feel (design) of plans and strategies developed by other local authorities, and were asked what they would like to see Croydon's plan look like when produced.

- 4.18 Particular likes included:
- Plans that were short and succinct (1-3 pages)
 - Realistic images that were relatable
 - Easy to understand
 - Colourful
 - Short sentences

- 4.19 Particular dislikes included:
- Pictures of senior officials
 - Lengthy documents
 - Plans with no pictures
 - Plans with no colours
 - Too much text on one page

- 4.20 As a result, we asked a small group of our care leavers to co-design the final plan with us, based on the feedback received from the broader group of children and young people.

5. CONSULTATION

- 5.1 Following a four week engagement period, a six week consultation was launched and ran from 22nd January – 4th March. The consultation looked at the whole draft plan, however primarily focused on the outcomes and priorities listed above.
- 5.2 Upon completion of the consultation period, a full analysis of findings was carried out to identify whether respondents feel that we have developed the right outcomes and priorities for Croydon. In addition, we asked participants to highlight if they feel we have missed anything, and if the language use feels right or whether it needs to be simplified to meet the understanding of a broad audience range.
- 5.3 The consultation was open to all residents, professionals, partners, children and young people. Targeted messages were circulated to schools, partners, and professionals working in the borough, as well as an internal communications campaign run to encourage staff in the Council to respond and circulate to their wider networks.
- 5.4 During the consultation period, a total of 128 people responded to the online survey via the council's "get involved" website.
- 5.5 Participants were provided with a draft copy of the plan, and were asked to comment specifically on the priorities and the outcomes that were being proposed.
- 5.6 Initially participants were asked to consider the proposed high level outcomes as follows:
*"We are proposing the following three outcomes to form the basis of our plan:
All children and young people:-*
1. Are supported to do well and access learning
2. Feel safe in their homes, schools and communities
3. Have good mental and physical health
Do you agree or disagree that these are the outcomes that our Children, Young People and Families Plan should focus on?"

- 5.7 118 responses were received, broken down as follows:

| Response | Number of Respondents | Percentage of Respondents |
|----------------------------|------------------------------|----------------------------------|
| Strongly agree | 62 | 52.54% |
| Agree | 43 | 36.44% |
| Neither agree nor disagree | 7 | 5.93% |
| Disagree | 2 | 1.69% |
| Strongly disagree | 3 | 2.54% |
| Don't know | 1 | 0.85% |

Broadly this shows that the majority of respondents (88.98%) strongly agreed or agree that they feel the proposed outcomes should be the focus of the Children, Young People and Families Plan.

- 5.8 Next, participants were asked to think about each priority, and advise whether they felt each priority was either:
- Very important
 - Fairly important
 - Neither important nor unimportant
 - Fairly unimportant, or
 - Very unimportant
- 5.9 Participants were then provided with an opportunity to explain their response using a free text box. Subsequently, for each priority, participants were asked to state on a scale of 1 to 10 (1 being not well at all, and 10 being extremely well) how well they feel we are currently doing to meet the listed challenge, and again provided with a free text box to provide commentary for their response.
- 5.10 A full analysis of the consultation to understand all comments is currently being prepared, and will be made available on the council's get involved website. High level findings will be shared as appropriate across the council and with partners, and in line with our privacy notice, with services to help shape strategic direction.
- 5.11 However, the consultation did confirm that the priorities that have been selected are either very important or fairly important although recognising that it's generally not felt we're currently doing enough as a partnership to meet these challenges. Below is an outline of the quantitative analysis of the consultation, including the response rates to each question:

| Please rate how important or unimportant the following key priority is to you: | | |
|--|-----------------------|---------------------------|
| Priority 1: Narrow the attainment gap for children and young people | | |
| <i>This single response question was answered by 96 respondents.</i> | | |
| Response | Number of Respondents | Percentage of Respondents |
| Very important | 63 | 65.63% |
| Fairly important | 27 | 28.13% |
| Neither important nor unimportant | 3 | 3.13% |
| Fairly unimportant | 1 | 1.04% |
| Very unimportant | 2 | 2.08% |
| Don't know | | |

Priority 1: Are we doing enough to meet this challenge (please rate on a scale of 1 to 10, where 1 is 'no, not at all' and 10 is 'yes, absolutely')

This single response question was answered by 106 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|----------|-----------------------|---------------------------|
| 1 | 28 | 26.42% |
| 2 | 4 | 3.77% |
| 3 | 9 | 8.49% |
| 4 | 7 | 6.60% |
| 5 | 25 | 23.58% |
| 6 | 11 | 10.38% |
| 7 | 15 | 14.15% |
| 8 | 5 | 4.72% |
| 9 | 1 | 0.94% |
| 10 | 1 | 0.94% |

Please rate how important or unimportant the following key priority is to you:

Priority 2: Support children and young people into adulthood and work

This single response question was answered by 88 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|-----------------------------------|-----------------------|---------------------------|
| Very important | 76 | 86.36% |
| Fairly important | 8 | 9.09% |
| Neither important nor unimportant | | |
| Fairly unimportant | 2 | 2.27% |
| Very unimportant | 2 | 2.27% |
| Don't know | | |

Are we doing enough to meet this challenge (please rate on a scale of 1 to 10, where 1 is 'no, not at all' and 10 is 'yes, absolutely')

This single response question was answered by 97 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|----------|-----------------------|---------------------------|
| 1 | 23 | 23.71% |
| 2 | 8 | 8.25% |
| 3 | 4 | 4.12% |
| 4 | 15 | 15.46% |
| 5 | 21 | 21.65% |
| 6 | 5 | 5.15% |
| 7 | 11 | 11.34% |

| | | |
|----|---|-------|
| 8 | 5 | 5.15% |
| 9 | 2 | 2.06% |
| 10 | 3 | 3.09% |

Priority 3: Build relationships with families to ensure a safe, happy and caring home.

This single response question was answered by 85 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|-----------------------------------|-----------------------|---------------------------|
| Very important | 75 | 88.24% |
| Fairly important | 8 | 9.41% |
| Neither important nor unimportant | 1 | 1.18% |
| Fairly unimportant | | |
| Very unimportant | 1 | 1.18% |
| Don't know | | |

Are we doing enough to meet this challenge (please rate on a scale of 1 to 10, where 1 is 'no, not at all' and 10 is 'yes, absolutely')

This single response question was answered by 90 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|----------|-----------------------|---------------------------|
| 1 | 21 | 23.33% |
| 2 | 7 | 7.78% |
| 3 | 5 | 5.56% |
| 4 | 11 | 12.22% |
| 5 | 18 | 20% |
| 6 | 12 | 13.33% |
| 7 | 6 | 6.67% |
| 8 | 7 | 7.78% |
| 9 | 1 | 1.11% |
| 10 | 2 | 2.22% |

Please rate how important or unimportant the following key priority is to you:

Priority 4: Help young people feel safer by addressing the causes and impact of exploitation and youth violence.

This single response question was answered by 77 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|----------------|-----------------------|---------------------------|
| Very important | 70 | 90.91% |

| | | |
|-----------------------------------|---|-------|
| Fairly important | 5 | 6.49% |
| Neither important nor unimportant | | |
| Fairly unimportant | | |
| Very unimportant | 2 | 2.60% |
| Don't know | | |

Are we doing enough to meet this challenge (please rate on a scale of 1 to 10, where 1 is 'no, not at all' and 10 is 'yes, absolutely')

This single response question was answered by 81 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|----------|-----------------------|---------------------------|
| 1 | 17 | 20.99% |
| 2 | 10 | 12.35% |
| 3 | 7 | 8.64% |
| 4 | 6 | 7.41% |
| 5 | 14 | 17.28% |
| 6 | 12 | 14.81% |
| 7 | 10 | 12.35% |
| 8 | 3 | 3.70% |
| 9 | | |
| 10 | 2 | 2.47% |

Please rate how important or unimportant the following key priority is to you:

Priority 5: Reduce the impact of negative childhood experiences and trauma.

This single response question was answered by 75 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|-----------------------------------|-----------------------|---------------------------|
| Very important | 65 | 86.67% |
| Fairly important | 8 | 10.67% |
| Neither important nor unimportant | 2 | 2.67% |
| Fairly unimportant | | |
| Very unimportant | | |
| Don't know | | |

Are we doing enough to meet this challenge (please rate on a scale of 1 to 10, where 1 is 'no, not at all' and 10 is 'yes, absolutely')

This single response question was answered by 80 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|----------|-----------------------|---------------------------|
| 1 | 21 | 26.25% |
| 2 | 7 | 8.75% |
| 3 | 10 | 12.50% |
| 4 | 4 | 5% |
| 5 | 15 | 18.75% |
| 6 | 5 | 6.25% |
| 7 | 10 | 12.50% |
| 8 | 5 | 6.25% |
| 9 | 1 | 1.25% |
| 10 | 2 | 2.50% |

Please rate how important or unimportant the following key priority is to you:

Priority 6: Make improvements to emotional wellbeing and mental health services.

This single response question was answered by 75 respondents.

| Response | Number of Respondents | Percentage of Respondents |
|-----------------------------------|-----------------------|---------------------------|
| Very important | 65 | 86.67% |
| Fairly important | 7 | 9.33% |
| Neither important nor unimportant | | |
| Fairly unimportant | 2 | 2.67% |
| Very unimportant | 1 | 1.33% |
| Don't know | | |

| Are we doing enough to meet this challenge (please rate on a scale of 1 to 10, where 1 is 'no, not at all' and 10 is 'yes, absolutely') | | |
|---|-----------------------|---------------------------|
| This single response question was answered by 79 respondents. | | |
| Response | Number of Respondents | Percentage of Respondents |
| 1 | 21 | 26.58% |
| 2 | 9 | 11.39% |
| 3 | 10 | 12.66% |
| 4 | 5 | 6.33% |
| 5 | 13 | 16.46% |
| 6 | 9 | 11.39% |
| 7 | 8 | 10.13% |
| 8 | 2 | 2.53% |
| 9 | 1 | 1.27% |
| 10 | 1 | 1.27% |

6. PRE-DECISION SCRUTINY

- 6.1 In January, Children and Young People's Scrutiny Sub-Committee were provided with an opportunity to scrutinise the process used to develop the plan and feedback received from children and young people, and partners. Overall comments from the committee were positive and members of the committee responded well to the idea of a plan being developed with the voice of the child at the heart.
- 6.2 Following the meeting, the committee received the link to the consultation for the plan, and were invited to provide detailed feedback on the individual outcomes and priorities.

7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 7.1 There are no direct financial implications for this plan.
- 7.2 **The effect of the decision**
This plan does outline the opportunity for our partnership to be delivering better outcomes in collaboration, and seeks the opportunity to ensure efficiency of service delivery. By having this plan agreed across our partnership, it will enable the partnership to better jointly prioritise funding across the partnership for the benefit of delivering the plan, and of our children and young people.
- 7.3 Investment across the Children and Families Partnership may be required to deliver the outcomes outlined in the plan, where actions or projects required are not already funded via existing resources or budgets. Investment in prevention and early intervention activity to improve outcomes may generate future savings or result in cost avoidance across the partnership.

7.4 Any actions or projects required within the action plans that are formed, are expected to be delivered within the existing resources of the Children and Families Partnership, and the Children, Families and Education Department.

7.5 Risks

The risk of not adopting the Children, Young People and Families Plan could mean that the Council and its partners fail to meet the needs of our children and young people which could have a direct impact on their life prospects and opportunities to achieve positive outcomes.

7.6 Options

Outlined below in section 12.

7.7 Future savings/ efficiencies

This will have a positive impact on the Council's budget by:

- Taking a preventative approach to reduce demand on service need where escalated levels of support are required.
- Taking a partnership/ whole-systems approach which should remove duplication and encourage a collaborative approach to service delivery and meeting the needs of residents.

Approved by Kate Bingham, (Interim) Head of Finance – Children, Families and Education

8. LEGAL CONSIDERATIONS

8.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and governance that the adoption and approval of the Children's and Young People's Plan is part of the Council's Policy Framework which full Council has reserved to itself to consider.

8.2 Whilst there are no direct legal implications arising from the recommendations in the report, as various projects and proposals are brought forward to support the delivery of priorities, specific legal advice will be required as to the implications.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

9. HUMAN RESOURCES IMPACT

9.1 There are no direct human resources implications expected as a result of the development and implementation of this plan. The priorities and actions created to support its implementation are either already planned for, or will be supported through to delivery through creating a skilled and motivated workforce, aligned to [Croydon's Workforce Strategy](#), and Croydon's **Interim Children's Workforce Strategy**.

10. EQUALITIES IMPACT

- 10.1 In January 2018 there were 56,570 children of school age living in Croydon. That number rose to 57,032, in January 2019. Of those children and young people 49.8% were female and 50.2% were male. We also know that 3.6% of Croydon students have an Education Health and Care Plan, and 11.4% require SEND support. 117 children on roll in Croydon schools identify as Gypsy/Roma or travellers of Irish heritage, and 33,852 identify as BAME or Non-White. Of those who identify as BAME 5,711 are Black Caribbean and a further 2,751 identify as White and Black Caribbean.
- 10.2 According to the 2018 Croydon Public Health report, “some areas in Croydon are amongst the 10% most deprived in the country. We know that in 2015, almost a fifth (18.7%) of Croydon children were living in poverty”. That child poverty rate varies significantly across the borough by localities, with “almost four times as many children living in poverty in Fieldway (30%) than Sanderstead (8%)”.
- 10.3 The development of this plan supports our ambition for “our children and young people to thrive and reach their full potential” – that every child is safe, happy and healthy, can access high quality education and youth facilities, and is able to take part in local democracy to ensure that the council tackles issues that matter most to children and young people.
- 10.4 The plan also seeks a long term resolution to some of the challenges Croydon faces in regards to children and young people. We anticipate that the plan will address identified and/or emerging issues in relation to equality of opportunities whilst creating opportunities that allow all children and young people to realise their personal potential.
- 10.5 Based on the engagement sessions carried out at a variety of educational provisions in the borough, we were able to engage with children and young people under a variety of protected characteristics. This information was not collected, however based on our observations and conversations we are confident that the following protected characteristics as defined within the Equality Act 2010 were engaged with: disability, age, ethnicity, gender and sexual orientation.
- 10.6 We are unable to confirm whether or not any of the children and young people engaged with fell under the following protected groups: religion or belief, gender reassignment, marriage or civil partnership, and pregnancy or maternity.
- 10.7 We anticipate no negative impact on groups that share protected characteristics will be created by developing and implementing this plan. Our ambition is to ensure that all children and young people have equal access to

opportunity, and therefore extra support will need to be provided to ensure that all priorities are equitable, and that all children and young people have a fair opportunity to achieve positive outcomes.

Approved by Yvonne Okiyo, Equalities Manager

11. ENVIRONMENTAL IMPACT

- 11.1 There are no specific environmental impacts arising from the contents of this report.
- 11.2 However given that the plan is looking at developing positive outcomes for our children and young people, the priorities that we set elsewhere in our strategies and plans, in terms of environment and sustainability, will need to speak to the priorities in this plan. Specifically with health as a key priority, poor air quality for example would have an impact on this.

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 One of the key priorities proposed within the plan is to help young people feel safer by addressing the causes and impact of exploitation and youth violence, and further the outcome that we are seeking to achieve is to ensure that children and young people feel safe in their homes, schools and communities.
- 12.2 The action plans that underpin this plan have been developed in partnership with the Police, and with the goals of the Violence Reduction Network in mind. Further we will ensure that this plan speaks to the Croydon Safer Communities Strategy when it is refreshed later in the year.
- 12.3 The priorities of the Violence Reduction Network, which seeks to take a public health approach to tackling violence, are aligned with the priorities within this plan. Our ambition is that working with young people are an early enough stage, we will prevent future crime and disorder, and make it safer for all children and young people to live in Croydon (Section 6 of the Crime and Disorder Act 1998).

13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 13.1 The proposed recommendations are as follows:
- Recommend to Full Council the adoption of the Children, Young People and Families Plan: the plan sits under the Council's policy framework, within the constitution and therefore is required to be recommended to Full Council.
 - The priorities and outcomes proposed have been developed in consultation with children, young people, staff, partners and key professionals. The plan puts our children and young people at the

heart of our priorities, and they will also contribute towards delivery of our priorities within the Corporate Plan.

14. OPTIONS CONSIDERED AND REJECTED

- 14.1 Not to adopt a strategy or Children and Young People's Plan.
- 14.2 In choosing not to adopt a partnership plan, it could mean that the Council and partners are not aligned in delivering services for our children and young people. This could lead to the delivery of multiple programmes of work, duplicating delivery. This does not conform to our whole-systems approach.

15. DATA PROTECTION IMPLICATIONS

15.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

No personal data has been requested or access during the process of developing this plan.

However, there is a small possibility that as a result of the questions in the consultation using free text boxes, the individuals participating in the consultation may utilise free text boxes to include personal data, or data that may be combined with other information to conclude personal data. This risk will be mitigated, see section 15.2.

The engagement process is concluded to not involve the processing of personal data, no individual can be identified by the high level analysis of the findings from the engagement sessions.

There are existing data sharing procedures in place with children's services and with partners. There are no amendments or additional data sharing implications arising from this report or this plan.

15.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

As a result of the information above, a DPIA has been completed and a privacy notice has been included on the get involved platform for information relating to the data process. Further, to mitigate any potential risk of capturing personal data, the Policy Team will ensure that the raw data is firstly process to remove any potential personal data implications, and will remove any indication of personal data. The new data set will then become the "workable" data set, and the original data set will be permanently deleted, meaning that no personal data will remain and can then be shared.

High level findings from the workable data set will be shared in order to make decisions about how best to plan/ prioritise for the outcomes and priorities

highlighted in this plan.

The Director of Policy & Partnerships comments that the information captured during the engagement process is not personal data, and no individual can be identified through any of the information used.

Approved by Gavin Handford, Director or Policy & Partnerships

CONTACT OFFICER: Rachel Farrar, Senior Policy Manager –
Policy & Partnerships
Tel: 0208 726 6000 ext. 63242

APPENDICES TO THIS REPORT: Appendix 1 – DRAFT Children, Young
People and Families Plan

BACKGROUND PAPERS: N/A

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Croydon’s Children, Young People and Families Plan 2020-2024

Our vision: Working together to make Croydon a place where all children and young people feel safe, healthy and happy.

“I feel safe in my home, school and community.”

What will we focus on?

- Building relationships with families to support safe, happy and caring homes
- Supporting young people to keep themselves safe (e.g. from being exploited or bullied)

What will this mean for children and young people?

- More families are supported earlier before problems get worse
- More young people are kept safe from crime – fewer victims and offenders
- More young people understand how to keep themselves safe within the community
- More families living in permanent homes

“I am supported to feel happier and healthier.”

What will we focus on?

- Investing in emotional wellbeing and mental health
- Promoting physical health and more active lifestyles

What will this mean for children and young people?

- More young people access emotional wellbeing support
- More families benefit from health visiting
- More children and young people are eat regular, healthy meals
- More children and young people are at a healthy weight

“I am supported to do well, and access learning and work opportunities.”

What will we focus on?

- Making sure that everybody has opportunities in education and learning
- Building skills for adulthood and work opportunities

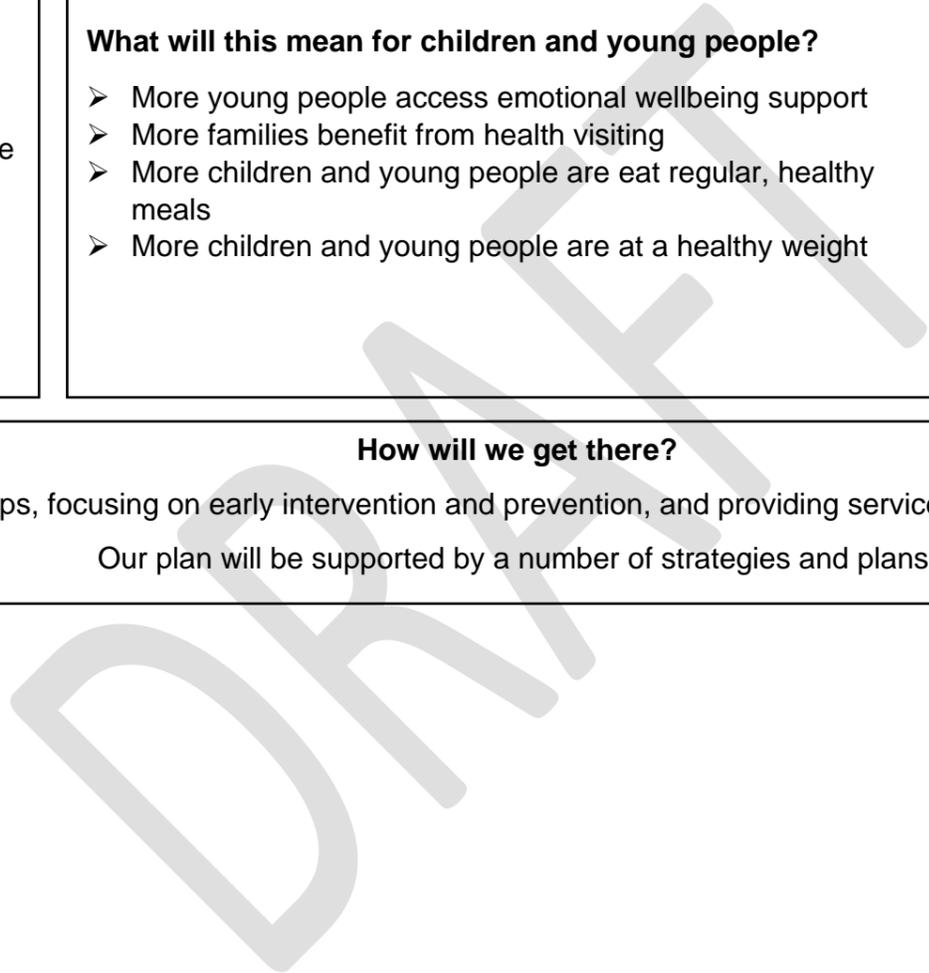
What will this mean for children and young people?

- More young people stay in school and avoid all types of exclusion
- More children and young people attend school more of the time
- More children and young people with special educational needs are better supported in mainstream and special schools
- More 16-24 year olds are in education, employment or training

How will we get there?

Working side by side in partnership to build strong relationships, focusing on early intervention and prevention, and providing services closer to where people need them (what we are calling 'localities').

Our plan will be supported by a number of strategies and plans.



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For General Release

| | |
|------------------------|---|
| REPORT TO: | CABINET 8 JUNE 2020 |
| SUBJECT: | Recommendations from Citizen’s Assembly on Climate Change |
| LEAD OFFICER: | Shifa Mustafa – Executive Director of Place |
| CABINET MEMBER: | Cllr Tony Newman – Leader of the Council All Cabinet Members |
| WARDS: | All |

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

The recommendations contained in this report aims to deliver against multiple priorities outlined in the Corporate Plan including but not limited to:

- *Improved air quality, especially at or near schools*
- *Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them*
- *Croydon’s recycling rate is increased and the use of plastics is reduced*
- *Transport, digital and social infrastructures are effective and support economic growth*
- *Less reliance on cars, more willingness to use public transport, walk and cycle*

[Corporate Plan for Croydon 2018-2022](#)

FINANCIAL IMPACT

The costs associated with the Citizen’s Assembly and Climate Crisis Commission have been and will continue to be funded from within existing revenue budgets. The recommendations themselves do not have any additional specific financial impact for the Council.

FORWARD PLAN KEY DECISION REFERENCE NO.: 1320CAB

The decision may be implemented from 1300 hours on the 6th working day after the decision is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Note the statements from the Citizen’s Assembly.

- | |
|--|
| <p>1.2 Give approval for the recommendations from the Citizen’s Assembly to be taken forward and actioned where possible by the Executive Director of Place in consultation with the Leader and Cabinet.</p> |
|--|

2. EXECUTIVE SUMMARY

- 2.1 This report is an update and sets out recommendations from the Citizen’s Assembly on Climate Change which was set up following approval from the Executive Director Place (0619PL //051 (19) DD). This followed on from the Sustainable Croydon Summit 2019 that took place on the 27th June where the Leader announced the intention to take a declaration of Climate Emergency to Council. Full Council declared a Climate and Ecological Emergency on 15th July 2019.
- 2.2 This report is a summary of the assembly sessions and recommendations. A more detailed report of the Citizen’s Assembly is attached.

3. DETAILS OF THE CITIZEN’S ASSEMBLY

- 3.1 The Citizen’s Assembly on Climate Change launched this year and took place from January – February 2020.
- 3.2 A citizens' assembly is a group of people who are brought together to discuss an issue or issues and reach a conclusion about what they think should happen. This method ensures that the actions the Council takes in regards to climate change and sustainability will be heavily influenced by the voice of residents.
- 3.3 Multiple Councils have undertaken Citizen’s Assemblies after declaring climate emergencies to great success including Camden Council.
- 3.4 This January, we launched our first Citizen’s Assembly, the first being on Climate Change. The Council worked with The Campaign Company to deliver the assembly to ensure that the recommendations that have resulted are independent and based solely on resident input.
- 3.5 In order for the assembly to come to a borough-wide consensus of opinion, members of the community were recruited and entered into a pool where 70 residents were then selected by age, gender, ethnicity and age group, and across groups that shared protected characteristics to ensure they were representative of our borough’s diverse communities.
- 3.6 Assembly members were being provided with £50 per session they attend to encourage those selected to participate in all three of the meetings of the assembly. Originally vouchers were suggested but due to popular demand, cash was given instead as it was more convenient for assembly members.

- 3.7 Participants that were recruited to take part in the Citizen's Assembly process were provided with pre-meeting briefings before each meeting to ensure that they were clear about what to expect before each session. This allowed each member to take an active approach over the course of the assembly.
- 3.8 The content of the meetings were co-designed by the Campaign Company with the Council to ensure that the assembly members were:
- Informed of any relevant background information regarding climate change and lowering carbon emissions in Croydon and London for context;
 - Given the opportunity to scope the issue of climate change in Croydon in the first session;
 - Able to take evidence and explore options around what can be done in Croydon to lower our carbon emissions across the borough as well as a Council;
 - Able to form a conclusion based on the scoping they have done and the evidence they have seen to produce a set of recommendations to be taken to Cabinet for the review of Council Members.
- 3.9 The meetings took place over a 2.5hr slot during evenings around the borough depending on the availability of assembly members to ensure most are able to attend. Over the course of the sessions, 42 individual assembly members attended the Citizen's Assembly.
- 3.10 The assembly was made up of three sessions:
- The first session served to provide background of the challenge around climate change and identify the main themes that Croydon needed to take action on. These were transport, education awareness and engagement and improving energy efficiency.
 - The second session focussed on what action could be taken in regards to the identified themes on an individual, Council and community level.
 - The third session had assembly members set out and agree specific recommendations to be considered by Cabinet.
- 3.11 Further detail on the assembly sessions can be found in the attached report.

4 OUTCOMES FROM THE CITIZEN'S ASSEMBLY

- 4.1 The outcomes from the Citizen's Assembly deliberations are summarised below as expressed by the assembly members:

Statements

- We support the Council's decision to take action on climate change.
- We believe that Croydon has a great opportunity to be one of the first to act and develop some trail blazing solutions.
- We believe that the issue is too big for anyone to do on their own so we call on the Council to show leadership and act as a role model collaborating

with others including businesses, the NHS, the voluntary sector, communities and special interest groups (e.g. the London Cycling Campaign, Ramblers, Friends of the Earth etc.) to develop concerted and co-ordinated action.

- We are prepared to take action ourselves on climate change but this will be boosted if the Council also leads by example by considering the following:
 - Building climate impact into everything it does (commissioning, operating etc.)
 - Educating and encouraging its staff to become Workplace Environmental Protection Officers, advocates and champions for climate action
 - Supporting businesses, landlords and residents to take action
 - Lobbying for more action from Government, the Mayor of London and other bodies
 - Using its influence within Croydon to encourage all agencies to adopt action plans
- We believe that many people are put off taking action on the climate because the information is confusing. We believe that we need a set of simple, understandable measures to chart our progress in Croydon.
- We believe that education and awareness around the issue cannot start too early. We therefore call for an extensive programme in all the borough's schools as a central part of the syllabus rather than an optional bolt-on. Colleges, training establishments and centres of adult education also have an important role to play.
- We want to see clearer and more regular feedback on the impact being made on the issue.
- We believe that there is a great opportunity to embrace and harness new technology to provide solutions to some of the challenges we face. Putting Croydon at the forefront of this will help to make this a centre for jobs and innovation and will promote Croydon as a future facing place to live and work.
- We want to see local business (particularly small and medium sized enterprises) rewarded if they sign up to environmentally friendly policies.
- Businesses and residents should be involved in discussions about the cost and payment schemes for environmental plans.
- We want the majority of socially responsible residents supported and recognised for contributions they make. We also want to see those who let us down identified and penalised.
- Action on climate must go hand in hand with measures to make the place cleaner, greener and safer.
- Young people are key – we want to see them taking a central role.

- We are open to the idea of charging people at a reasonable level who have highly polluting cars more on condition that efforts are made to improve public transport and those who adopt greener solutions (like walking, cycling car sharing and electric vehicles are rewarded). But above all we want to see fewer cars in total on the borough's roads with shorter journeys in particular being cut.
- We believe that the scale and speed of action required to tackle the climate challenge will need a whole community approach.
- We understand that Croydon faces a housing crisis and it needs to build more homes especially affordable housing for local people who are unable to find suitable accommodation. We call on the Council to develop a set of principles and regulations that will ensure that additional homes do not compromise the commitment to a greener, cleaner and more attractive borough. Making better use of existing housing stock that is empty or under used would help in this respect.
- The key priority areas to be actioned for Climate Emergency are: transport, air quality, energy use and awareness and engagement.
- We do not believe that currently, Croydon residents are sufficiently aware, engaged or equipped to play the central part needed in this change. Addressing this should therefore be a major priority.
- We support a community advocate programme that will train and support residents to help their communities' effect change.
- The spaces, networks, organisations and expertise that the borough has should be identified and co-ordinated to provide maximum environmental impact.
- Waste and recycling is an important aspect of the environmental challenge as everyone should be responsible for it. Information and action is needed to enforce good practice and take measures to penalise those who do not act responsibly.
- We are pleased to hear that the Croydon Climate Crisis Commission for a Sustainable Croydon has been set up and that residents' voices will be represented on this. We would like to see work from the Council and the Commission begin as soon as possible (we think some action can be taken immediately) and for residents' to be informed and engaged in this important area.

Recommendations

- 4.2 From the above statements, the recommendations that can be actioned by the Council are the following:
- Continue to take action on Climate Change, working in conjunction with partners, schools, businesses and residents.

- Consider the following:
 - Building climate impact into everything it does (commissioning, operating etc.)
 - Educating and encouraging its staff to become Workplace Environmental Protection Officers, advocates and champions for climate action
 - Support businesses, landlords and residents to take action with schemes rewarding positive action and punishing negative action
 - Lobbying for more action from Government, the Mayor of London and other bodies
 - Using its influence within Croydon to encourage all agencies to adopt action plans
- Create a set of simple, understandable measures to chart progress in tackling the climate emergency in Croydon.
- Encourage all the schools in the borough to implement an extensive programme as a central part of the syllabus rather than an optional bolt-on.
- Encourage young people to take a central role in tackling the climate emergency.
- Develop a set of principles and regulations that will ensure that additional homes do not compromise the commitment to a greener, cleaner and more attractive borough.
- Create a community advocate programme that will train and support residents to help their communities' effect change as tackling the climate challenge will need a whole community approach.
- Identify and coordinate a network of spaces, groups, organisations and experts that the borough has to provide maximum environmental impact.
- Continue with work through the Croydon Climate Crisis Commission and ensure that residents are kept informed and engaged.

5 NEXT STEPS - CROYDON CLIMATE CRISIS COMMISSION

- 5.1 After declaring the Climate and Ecological emergency in July 2019, the Leader made the decision to have the Council work with the New Economics Foundation to create the independent Croydon Climate Crisis Commission which launched on the 12th March at Croydon College.
- 5.2 This commission will identify long term goals in order to dramatically reduce the Council's carbon emissions as well as recommend realistic actions in order for Croydon as a borough to become a sustainable city.
- 5.3 As has been said from the beginning at the Sustainable Croydon Summit, the Council intends to work closely with residents, including young people, and

businesses to become more sustainable. To this end, the New Economics Foundation has consulted with stakeholders around the borough to form the commission.

- 5.4 The recommendations from the Citizen's Assembly can be used by the commission as a starting point for the commissioners to then form an action plan to make Croydon more sustainable. Strategy groups sitting under the commission which will likely be a mix of relevant officers, experts, businesses and residents could then begin to enact this plan once it has been approved by Cabinet.
- 5.5 However this is subject to change as the commissioners will be expected to take part in setting the brief for the commission post initial meeting.
- 5.6 At the beginning of this year, Miatta Fahnbulleh, CEO of the New Economics Foundation, was appointed the chair of the Croydon Climate Crisis Commission.

6 PRE-DECISION SCRUTINY

- 6.1 The Citizen's Assembly on Climate Change and the Croydon Climate Crisis Commission went to the Scrutiny Streets, Environment & Homes Sub-Committee in December 2019 as part of the Sustainable Croydon report taken by Cllr King. Recommendations were around:
 - Careful attention needed to be given to the composition of members on the Citizens Assembly as well as the Commission to ensure there was appropriate representation of the diversity of the borough
 - Officers should give consideration as to how to measure success in order to ensure that it was on target to meet commitments to be Carbon Neutral by 2030
 - The Council must exercise caution in managing the costs associated to the projects and ensure that all costs incurred were quantifiable to work that was being undertaken.
 - Whilst it was recognised that the Council was trying to be thorough in its research and fact finding, consideration must be given to expediting progress as there had been considerable delay since the declaration was made to producing an action plan, which was still currently awaited.

7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 7.1 The costs associated with the Citizen's Assembly and Climate Crisis Commission are being funded from within existing revenue budgets. The recommendations do not have any additional financial implications and any future financial impact will need to be met from existing revenue budgets.
- 7.2 The allocation of funding and the outcomes of the Commission will be monitored regularly.

Approved by Lisa Taylor, Director of Finance, Investment and Risk and s151 Officer.

8 LEGAL CONSIDERATIONS

- 8.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that whilst there are no direct legal implications arising from the recommendations within this report, as recommendations are sought to be implemented, whether via Action Plans or otherwise, this could give rise to legal implications and specific legal advice will need to be sought to support this implementation.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

9 HUMAN RESOURCES IMPACT

- 9.1 There are no immediate implications for LBC staff arising from this report.

Approved by: Sue Moorman, Director of Human Resources

10 EQUALITIES IMPACT

- 10.1 The Citizen's Assembly members were recruited to form a representative sample of Croydon's diverse population to ensure we take on board the views of and hear the voices of all our residents.
- 10.2 Likewise the commissioners for the Climate Crisis Commission have been and will continue to be appointed are from diverse backgrounds to further ensure that Croydon is adequately represented in any action the Council takes regarding climate change and sustainability.
- 10.3 An Equality Analysis will be completed and come to Cabinet with the climate action plan to ascertain the potential impact on groups that share protected characteristics

Approved by: Yvonne Okiyo, Equalities Manager

11 ENVIRONMENTAL IMPACT

- 11.1 There have been no direct environmental impacts from the Citizen's Assembly however, the meetings have encouraged residents to think and act on ways to become more sustainable and lower their carbon footprint.
- 11.2 The recommendations that have come from the assembly and the actions that will be taken as a result will lower our carbon emissions as a Council and a borough with direct input from Croydon residents.

- 11.3 This assembly has and the commission will identify what is necessary to achieve Croydon's aim to be carbon neutral by 2030 and London's commitment of 2050 with resident input.
- 11.4 A report detailing the climate action plan will come to Cabinet and identify further environmental impacts.

12 CRIME AND DISORDER REDUCTION IMPACT

- 12.1 No expected impact.

13 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 13.1 The recommendations from the Citizen's Assembly on Climate Change need to be approved so the Council (via the commission) can take action on the Climate and Ecological emergency with resident input.

14 OPTIONS CONSIDERED AND REJECTED

- 14.1 No other options have been considered at this stage.

15 DATA PROTECTION IMPLICATIONS

15.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

- 15.2 The Director of Policy and Partnership comments that the data and evidence considered by the Citizen's Assembly did not include any personal data.
- 15.3 Personal data for the Citizen's assembly members was collected and maintained by the third party provider. This was held in accordance with their policies and privacy notices.

Approved by: Gavin Handford, Director of Policy and Partnership.

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APPENDICES: Appendix 1 – Final report on Citizen's Assembly on Climate Change

BACKGROUND DOCUMENTS: None

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TACKLING THE CLIMATE CRISIS in Croydon



A report of the work of the Croydon Citizens' Assembly on Climate Change





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Executive Summary

1 Background

In July 2019, the Leader of Croydon Council declared a climate emergency. *The Citizens' Assembly on Climate Change* was set up to ensure that the voice of residents across the borough would be put at the heart of Croydon Council's plans to tackle this.

A representative group were recruited to form the *Citizens' Assembly*. These 42 members met on three occasions in January and February 2020 to review evidence and explore the options for reducing carbon emissions across the borough. By the end of the process, Assembly members agreed a position statement for the Council to consider. The deliberations of the Assembly will inform the work of the *Croydon Climate Crisis Commission* set up to identify long-term actions and goals to reduce the Council's carbon emissions.

The Campaign Company (TCC), an independent research and engagement company, was commissioned to recruit, facilitate and report back on the work of the *Croydon Citizens' Assembly on Climate Change*. This report represents the results of the Assembly's work. We are grateful for the enthusiasm and commitment that Assembly members showed throughout the process.

2 The approach

Citizens' Assemblies are a form of deliberative engagement that give members of the public, not already actively engaged in civic life, the time and opportunity to learn about and discuss a topic, before reaching conclusions.

As the urgency to take action to address the climate crisis has become more apparent, some councils have used the *Citizens' Assembly* approach (one that is also advocated by campaigning organisations such as *Extinction Rebellion*) to gain community insight into how to address the issue locally.

The small number of Citizens' Assemblies that have discussed climate change issues so far have set residents the task of deliberating on the question of the climate emergency and agreeing detailed outputs, targets and measures over a discrete short period of time. This was rightly never the objective in Croydon. The Council had invested in previous research on sustainability across the borough and understood that in Croydon a longer-term process would be needed to produce inclusive and sustainable change. This is one reason why it had been agreed to set up an independent *Climate Crisis Commission* to carry forward the work.





The conclusions of the *Citizens Assembly* represent an important stage in the process which was set up to better understand:

- **The priority climate change issues for residents**
- **How residents would like to see their town develop in a sustainable way**
- **The role that residents and communities can play in achieving this**
- **The challenges, barriers to, and also opportunities for change**
- **The propensity of residents to take action**
- **What residents want to see from the Council and other partners**

At the core of the **deliberative approach** is a **format** and **environment** with **both resident and expert input**

At the core of the deliberative approach is a format and environment with both resident and expert input that allows for reasoned, informed discussion of the issues. Assembly members met experts, elected members and officers and were able to express concerns, raise questions and put forward suggestions. Discussions were designed to share experiences and perspectives so that areas of consensus and disagreement could be captured.

In addition to the priorities for discussion around key areas such as transport, air quality and clean energy, the Assembly added the priority of increasing awareness and engagement for Croydon residents. This group of previously largely unengaged residents demonstrated an appetite to learn and take further action once they had heard evidence and expert witnesses. Deliberation with each other cemented this interest, and a high proportion of Assembly members have signalled a desire to stay involved in the process.

This suggests that a key component of the strategy now to be developed by the independent Commission should be how to inform, involve and inspire the people of Croydon to be part of the change.

3 What Citizens' Assembly members said

The position statement below reflects the outcome of the deliberations of the Assembly which has been agreed by Assembly members.

CROYDON CITIZENS' ASSEMBLY ON CLIMATE CHANGE: OUR VIEWS

We support the Council's decision to take action on climate change.

We believe that Croydon has a great opportunity to be one of the first to act and develop some trail blazing solutions.

We believe that the issue is too big for anyone to do on their own so we call on the Council to show leadership and act as a role model collaborating with others including businesses, the NHS, the voluntary sector, communities and special interest groups (eg the *London Cycling Campaign*, *Ramblers*, *Friends of the Earth* etc) to develop concerted and co-ordinated action.

We are prepared to take action ourselves on climate change but this will be boosted if the Council also leads by example by considering the following:

- **Building climate impact into everything it does (commissioning, operating etc)**
- **Educating and encouraging its staff to become Workplace Environmental Protection Officers, advocates and champions for climate action**
- **Supporting businesses, landlords and residents to take action**
- **Lobbying for more action from Government, the Mayor of London and other bodies**
- **Using its influence within Croydon to encourage all agencies to adopt action plans**

We believe that many people are put off taking action on the climate because the information is confusing. We believe that we need a set of simple, understandable measures to chart our progress in Croydon.

We believe that education and awareness around the issue cannot start too early. We therefore call for an extensive programme in all the borough's schools as a central part of the syllabus rather than an optional bolt-on. Colleges, training establishments and centres of adult education also have an important role to play.

We want to see clearer and more regular feedback on the impact being made on the issue.

We believe that there is a great opportunity to embrace and harness new technology to provide solutions to some of the challenges we face. Putting Croydon at the forefront of this will help to make this a centre for jobs and innovation and will promote Croydon as a future facing place to live and work.

We want to see local business (particularly small and medium sized enterprises) rewarded if they sign up to environmentally friendly policies.

Businesses and residents should be involved in discussions about the cost and payment schemes for environmental plans.

We want the majority of socially responsible residents supported and recognised for contributions they make. We also want to see those who let us down identified and penalised.



Action on climate must go hand in hand with measures to make the place cleaner, greener and safer.

Young people are key - we want to see them taking a central role.

We are open to the idea of charging people at a reasonable level who have highly polluting cars more on condition that efforts are made to improve public transport and those who adopt greener solutions (like walking, cycling, car sharing and electric vehicles are rewarded). But above all we want to see fewer cars in total on the borough's roads with shorter journeys in particular being cut.

We believe that the scale and speed of action required to tackle the climate challenge will need a whole community approach.

We understand that Croydon faces a housing crisis and it needs to build more homes especially affordable housing for local people who are unable to find suitable accommodation. We call on the Council to develop a set of principles and regulations that will ensure that additional homes do not compromise the commitment to a greener, cleaner and more attractive borough. Making better use of existing housing stock that is empty or under-used would help in this respect.

The key priority areas for this are: transport, air quality, energy use and awareness and engagement.

We do not believe that currently, Croydon residents are sufficiently aware, engaged or equipped to play the central part needed in this change. Addressing this should therefore be a major priority.

We support a community advocate programme that will train and support residents to be help their communities effect change.

The spaces, networks, organisations and expertise that the borough has should be identified and co-ordinated to provide maximum environmental impact.

Waste and recycling is an important aspect of the environmental challenge as most people should be responsible for it. Information and action is needed to enforce good practice and take measures to penalise those who do not act responsibly.

We are pleased to hear that the *Climate Crisis Commission for a Sustainable Croydon* has been set up and that residents' voices will be represented on this. We would like to see work from the Council and the Commission begin as soon as possible (we think some action can be taken immediately) and for residents' to be formed and engaged in this important area.

1 Introduction

1.1 Croydon Citizens' Assembly on Climate Change - the context

Croydon Council has a vision of making Croydon the greenest and most sustainable borough in London. Taking action locally to tackle the climate and ecological emergency is a key part of that vision. In July 2019, the Leader of Croydon Council declared a climate emergency and the Council has a target of being carbon neutral by 2030.

The Council has always recognised that it cannot tackle this challenge alone and that to succeed a longer-term process would be needed to produce inclusive and sustainable change. It has invested in seeking the views of key statutory partners, businesses and most critically Croydon residents which culminated in a *Sustainable Croydon Summit* held at Boxpark in June 2019 which explored how everyone in Croydon could work together to achieve its ambitions.

One of the key outcomes of the *Sustainable Croydon Summit* was to set up an independent *Climate Crisis Commission* to help deliver a sustainable Croydon and identify long-term goals to reduce carbon emissions across the borough. It was also agreed that a *Citizens' Assembly on Climate Change* should be set up in advance of the launch of the Commission to ensure that the voice of residents across the borough could inform the work of the Commission and Croydon Council's plans.

The Campaign Company (TCC), a Croydon based independent research and engagement company, was commissioned to recruit, design, facilitate and report back on the work of the *Croydon Citizens' Assembly on Climate Change*. This report represents the results of the Assembly's work.

Croydon Council has a **vision** of making Croydon **the greenest and most sustainable borough in London.**

1.2 How the Citizens' Assembly worked

Citizens' Assemblies are a form of deliberative engagement that give members of the public, not already actively engaged in civic life, the time and opportunity to learn about and discuss a topic, before reaching conclusions.

As the urgency to take action to address the climate crisis has become more apparent, councils have increasingly used the *Citizens' Assembly* approach (one that is also advocated by campaigning organisations such as *Extinction Rebellion*) to gain community insight into how to address the issue locally.

In Croydon, a group of residents were recruited to form *Croydon Citizens' Assembly*. These Assembly members were recruited to be broadly representative of the borough by age, gender, ethnicity and geography. More information about the recruitment process is set out in Appendix A.

The organisation of the *Citizens' Assembly* was led by officers from Croydon Council, overseen by an independent advisory board and supported by TCC.

The role of the advisory board was to review the structure and content of the *Citizens' Assembly* to ensure that Assembly members were provided with information to allow them to deliberate in an informed manner.

The members of the Advisory Board were:

- **Polly Billington** - *Director, UK100 Cities*
- **Tim Coombe** - *Croydon Extinction Rebellion*
- **Shifa Mustafa** - *Director of Place, Croydon Council*
- **Richard Jackson** - *Director of Environmental Sustainability, University College London*

1.3 The Citizens' Assembly journey

Croydon's Citizens' Assembly on Climate Change was set up to help the Council better understand:

- **The priority climate change issues for residents**
- **How residents would like to see their town develop in a sustainable way**
- **The role that residents and communities can play in achieving this**
- **The challenges, barriers to, and also opportunities for change**
- **The propensity of residents to take action**
- **What residents want to see from the Council and other partners**



A programme of three deliberative sessions, attended by 42 Assembly members, was designed and delivered in January and February 2020 to help gain a better understanding of these issues.

The programme covered these in the following way:

- **Introduction to the Croydon Citizens' Assembly (pre-event communication)** – this focussed on setting out the purpose of the Citizens' Assembly and expectations of members as well as distributing a briefing on Croydon's approach to sustainability to provide some context
- **SESSION 1: What climate change means for people in Croydon** (22 January, Stanley Halls, South Norwood) - this set out why climate change was an urgent issue; what this meant for Croydon; an overview of the priority issues that Croydon Council wants Assembly members input on including tackling transport; improving air quality; improving energy efficiency and any other issues that Assembly members want to focus on
- **SESSION 2: How we can tackle climate change in Croydon together** (6 February, Braithwaite Hall, Croydon Clocktower) - exploring the roles individuals, communities, the Council and its partners can play in reduced carbon emissions in the key priority areas
- **SESSION 3: Taking action to tackle climate change** (20 February, Braithwaite Hall, Croydon Clocktower) - agreeing a position statement reflecting the deliberations of the Citizens' Assembly and prioritising action.

At the core of the deliberative approach is a format and environment with both resident and expert input that allows for reasoned, informed discussion of the issues. *The Croydon Citizens' Assembly* sessions were designed to allow Assembly members to meet experts, elected members and officers and to express concerns, raise questions and put forward suggestions in a safe environment. Discussions were designed to share experiences and perspectives so that areas of consensus and disagreement could be captured.



Each session involved introductory presentations on each topic from the Council or external speakers. Assembly members split into groups for facilitated discussion, using open-ended questions and exercises to capture the full range of views of the Assembly members, who showed insight and a range of informed opinions in deliberating each topic. Feedback from table discussions were also shared at each session so that Assembly members could hear what their peers on other tables had discussed.

The final session was an opportunity to get consensus from the whole Assembly on what residents across Croydon felt were the important issues to address to effectively tackle the climate emergency.

As part of their discussions, Assembly members met key decision-makers from the council, including the Leader, Deputy Leader for Housing, Deputy Cabinet member for *Clean and Green Croydon* and the Deputy Cabinet member for *Environment, transport and Regeneration*.

Throughout the process, those participating in the Assembly showed a high-level of enthusiasm in helping to shape the changes taking place in Croydon and the importance of ensuring that any action taken would benefit their community.

The content generated as part of each session is detailed below. The presentations and exercises that were used to guide discussion are available to download separately from **www.croydoncitizensassembly.org** (an online space to support *Citizens' Assembly* deliberations).



2 SESSION 1: What climate change means for people in Croydon

2.1 Overview of the session

The agenda for this session covered the following key elements:

Presentations

- *"Why Croydon Citizens' Assembly on Climate Change is important"*
Cllr Tony Newman, Leader of Croydon Council
- *"The Climate Emergency"*
Dr Alex Chapman, New Economics Foundation
- *"Climate change and Croydon: the story so far"*
Shifa Mustafa (Executive Director-Place, Croydon Council)



Table discussions

- **Table discussion 1: What do you think?** Inviting Assembly members to comment on and add to Croydon's priority issues – transport, air quality, improving energy efficiency
- **Table discussion 2: What does this mean for you?** Inviting Assembly members to discuss the priority issues in more details

2.2 What the Citizens' Assembly said

Table discussions focussed on the key issues that the Council are looking for resident feedback on to inform decisions on reducing carbon emissions across the borough and creating a sustainable Croydon. These issues are air quality, transport and improving energy efficiency. Assembly members themselves identified an additional priority that they wanted the Council to consider - educating and engaging the public around climate change.

The key headlines from these discussions are summarised below. At this stage, members were also asked to prioritise the issues that were most important to them: transport was identified as the most popular issue for discussion. This is followed by air quality then education and lastly improving energy efficiency.

Air quality - the issues and challenges

- There is a general consensus that this is really important because of the health challenges this presents to the most vulnerable in communities (especially children and older people) and people who are trying to be healthier (including runners, walkers and cyclists)
- There is recognition that although the Council is trying to address this through anti-idling measures especially near schools and no parking zones. However, this could potentially exacerbate pollution in other areas - "it just moves the problem to other streets". More strategic and holistic approaches that takes into account the impact on the "whole place" should be taken.

More **strategic and holistic** approaches that takes into account the **impact on the "whole place"** should be taken.

- There was strong agreement that since there is clearly a link between air quality and transport, developing sustainable forms of public transport to discourage people using cars would also improve air quality.
- It was suggested that there should be stronger enforcement on "pollutants" (including heavy road users, higher emission vehicles and businesses) - "stop procrastinating and act"
- It was also recognised that there is a conflict between the need to improve the climate and the extent to which individuals will make sacrifices - flying to holiday destinations exemplified this. More education about the impact and what can be done to offset any actions would be helpful.

There is a **conflict** between **the need to improve the climate** and the **extent** to which **individuals will make sacrifices**

Transport - the issues and challenges

- The following sentiment summarised a common feeling across all discussions: "The thing about public transport at the moment is that it isn't good enough or regular enough - make it better and of course we'll stop using our cars as much".
- There is a general consensus that Croydon has a really strong transport infrastructure and the biggest impact on the climate could be made by "greening" this and looking at sustainable forms of public transport. A number of suggestions to build on these assets and discourage car use were made including: extending the tram link; improving connections across Croydon (not just through town centre), having more park and rides; incentivising car sharing schemes, more *Boris bikes*, banning 4x4 vehicles "*Chelsea tractors*" in high density parts of the borough, points off licences, etc).
- Affordability of public transport and accessibility were raised as issues to be addressed if we were to steer people away from the convenience of cars
- It was also felt that more could be done to support the growth of electric vehicles including more charging points in public places for electric cars, more electric buses, etc





Improving energy efficiency - the issues and challenges

- It was felt that a big opportunity to address this would be to set enforceable targets for developers to introduce energy efficiency measures in all new-builds (homes and businesses)
- It was felt that more action might be taken if there were financial incentives for energy efficient homes and businesses.
- More should be done to tell people what to do to make their homes more energy efficient (eg solar panels, insulate roofs, use LED bulbs, etc)
- Could introduce innovations such as V2G (vehicle to grid) to “recycle energy” better
- Make sure each part of a “sustainable system” eg electric cars is eco-friendly rather than just putting a zero-carbon step at the end of a process which starts with burning fossil fuels

Educating and engaging the public - the issues and challenges

- There was consensus that carbon literacy was really important to engage more people on the issue of tackling climate change and getting them to take action. This included “de-jargonising” the whole climate change language (eg explaining what net zero means) and making targets more realistic and more local/individual (rather than global).
- The need for better education, information and awareness on how to make a difference crossed all the themes discussed. In addition, people thought that there should be more on other areas too including recycling - especially of plastics and food waste
- Campaigns or information to change people’s attitudes was also felt to be important and the need to start educating people at an early age (eg in schools) was felt to be critical to this.

There was **consensus** that **carbon literacy was really important** to **engage more people** on the issue of **tackling climate change**

3 SESSION 2: How we can tackle climate change together

3.1 Overview of the session

The agenda for this session covered the following key elements:

Presentations on how to take action on the priority issues

- *"Changing how we travel"*
Ian Plowright (Croydon Council)
- *"Engaging and communicating with Croydon residents on climate change"*
David Evans (TCC)

Table discussions

- **Table discussion 1: What can individuals do to tackle climate change?** Inviting members to explore what people can do to change the way way they travel; clean up their energy / be more energy-efficient; engage people to change their behaviours (including changing what they eat and buy, how they waste less and recycle more, and work with nature)
- **Table discussion 2: What can communities do to tackle climate change?** Explore what can be done at a neighbourhood / community level to reduce carbon in terms of travel; energy efficiency; community engagement, etc)
- **Table discussion 3: What can the Council and partners do to tackle climate change?** Explore what the Council can do as provider, enabler and influencer to reduce carbon across the themes but also in partnership with health, businesses, VCS, etc

3.2 What the Citizens' Assembly said

Table discussions focussed on the key roles that individuals, communities and the Council (and partners) can play in tackling climate change.

Some of the cross-cutting themes that were raised across all tables included:

- The best role the Council can play is creating an environment where individuals, communities and others can easily take actions to tackle the climate emergency - this can be done through raising awareness and engaging people on the issues; incentivising good behaviour; punishing bad behaviour; being an effective advocate for the people of Croydon



- To show its commitment to this agenda, the Council should aim to “Be the first” and lead the way in a number of areas – role modelling the right actions, piloting innovative solutions, engaging widely
- The big “issues” that the Council needed to address as part of this agenda were:
 - the challenge of building homes to meet the housing crisis vs protecting the borough’s valued green and open spaces
 - Croydon is a growth borough – there is an opportunity to make sure that targets for “growth” have sustainability – especially environmental sustainability - built in to them
 - making the most of the borough’s excellent transport infrastructure to discourage car use
 - equipping communities and individuals to do more for themselves

The Council should **aim to “Be the first” and lead the way** in a number of areas

More detailed feedback on the table discussions around roles that individuals, communities and Council can do is summarised below.

WHAT CAN INDIVIDUALS DO

Changing how we travel

- Encourage people to make sustainable modes of transport (cycling, walking, public transport etc) a part of their daily routine, rather than certain options occasionally taken. By getting into habits and making this a regular part of their day, people will find it much easier to avoid using polluting forms of travel
- Fly less
- Gain confidence in cycle roads routes (know design, lights and where you feel safe)
- Use electric bikes
- Sharing car journeys and car-pool more
- Think of the health benefits of cycling or walking
- Stop car-idling - one’s own car but also not be shy about politely asking people leaving their engines running to turn them off.
- Evaluate the need to actually own a car, and in the case of families with multiple cars, look into the possibility of all sharing one car rather than each having a personal vehicle.



Managing what we eat

- Grow own food
- Reduce food wastage/ don’t over food shop
- Portion sizes reduced (Reduce food waste)
- Eating less red meat



Cutting energy at home

- Insulate homes more efficiently - lofts, windows, doors
- Close doors to trap warmth
- Use central heating sparingly or just in the room you want to heat
- Landlords can incentivise tenants to be energy efficient
- Solar panels
- Smart technology including smart heating, smart meters, etc
- Timers on appliances that use water
- Wash on lower temperatures
- Use energy more efficiently, bulbs, running appliances at off peak times.

Managing what we buy

- Recycling and reusing material waste as much as possible, as well as being conscious to buy/use products which don't produce much plastic waste (eg unpackaged fruit)
- Make own cleaning products
- Re-use bags
- Reduce plastic usage
- Don't use wrapping-paper and plastics over Christmas
- Buy fewer clothes that last longer

Other

- Treating the area directly around you (eg your street) as "your patch", to be looked after and maintained. This can be done in collaboration with neighbours and will contribute to an overall cleaner borough for everyone
- Set own personal goals (i.e. targets for recycling, lowering food and clothing purchases)
- Compost more
- People should make sure to police, where possible, fly tipping in their area
- Recognise that for some families - particularly in low income households - that they will have more urgent priorities than the environment.

WHAT CAN COMMUNITIES DO

Work together

- Carpooling
- Cycling clubs
- Walk to school days
- Local community orgs to form a pan-network of community groups that can share information and resources to help tackle the climate emergency together
- Coordinate resources/ skills/ knowledge including community and business spaces
- Local community transport schemes eg school buses
- Groups can set their own targets for reducing waste and emissions, tailored to their own circumstances, goals and resources.
- Shared shopping schemes



Community voice

- Form parent lobby groups in schools
- Spread information through community groups
- Use social media eg neighbourhood WhatsApp groups to share, educate and inform
- Engage with neighbours (start a conversation about recycling, actions one can take)
- Lobby energy companies
- More neighbourhood assemblies like this (Croydon Citizens Assembly) but in local areas. Have 'green events' in communities to host climate crisis briefings like this.

Raise awareness

- 'Safer cycling for kids' courses and clubs
- Give help and publicity to existing action groups and local initiatives
- Develop and support community "green" champions
- Pyramid messaging - a good way of educating the community is for a group or individual to share ideas which have worked well for them and then share those ideas with another three people, helping creative solutions spread through the community.
- Workshops for local community groups to raise awareness on how and what their community spends energy on.
- Promote the 'Don't mess with Croydon' App.
- Use transport areas and community spaces to promote initiatives

A good way of **educating the community** is for a group or individual to **share ideas which have worked well for them**

Encourage and incentivise community action

- Businesses reducing use of light, sensor lighting for public buildings
- Subsidies for more expensive lightbulbs
- Providing perks for “wanted behaviour” i.e. timers for water usage during showers
- Give communities targets
- Give people posters, badges that show they are taking part (neighbourhood watch style)
- Environmental themed competitions, to encourage communities and people of all ages.
- Companies can introduce a cycle scheme for their employees whereby they help people buy a bike (and the relevant safety gear, safety being identified as a major disincentive to people wanting to switch to cycling). On this bike shops are specifically identified as needing to offer more bundles to people buying a bike (helmets, lights, locks etc)
- Businesses need to take more pride in the area surrounding them and treat it as if they lived there. Therefore the “personal patch” idea also applies to them.
- Eco-friendly shops and businesses. Ensure that local shops and businesses are eco-rated on things like how much they recycle or energy use. We have it for hygiene so why not for their environmental impact?



Allow communities to innovate and lead the way

- Schools should be electricity generating hubs i.e. swings, bikes, playground accessories - generating power
- Tree planting schemes in schools
- Reduce light usage in schools, have outside lessons when seasons allows it (ie using natural light)
- Expand the “*Library of Things*” concept where rarely but frequently used items (eg Hedge Trimmers) are held for community use - helps to reduce consumerism
- Turn parts of parks into allotments, vegetable patches, polytunnels, garden centres
- Use waste to create art, i.e. instead of drawing on new paper, use what is available of food wrappers or lollipop sticks to create the art.
- “*School streets*” - more initiatives and schemes like this.
- Solar panels on the roofs of schools.



WHAT CAN THE COUNCIL DO

Lead by example

- Eliminate single-use plastics from its services and set standards for others
- Take on a leadership role among partners including NHS, nationally run public services and government departments in the borough, TfL and others to achieve and exceed its sustainability goals
- Hybrid electric fleet
- Reduce waste within council i.e. paper
- Go fully green in the council
- Have recycling opportunities in work place
- Council staff should drive less
- Practice what you preach and inspire people to make a difference



'Be the first'

- Set ambitious targets to inspire action
- For example, the first all-electric bus routes
- The first to have community water points to fill up chilly bottles, etc
- The first to have public smart bins
- The first to have wind powered schools or other public services
- Using Westfield as an opportunity to be the best model for "green and sustainable" high street and retail development

Enable 'greener' travel

- The council should look into making sure that streets (and bus stops especially) are well lit at night - safety is a large factor for people choosing to drive over more sustainable travel options.
- The council needs to bring in more dedicated bike lanes, prioritising common commuting routes and particularly dangerous roads. Make existing bike lanes safer and signpost them more clearly.
- In central Croydon a "park and ride" scheme would help prevent people from driving into the town centre, where air pollution is especially bad. People could park in a large car park, before buying a ticket which pays for both their parking and a bus journey into town. In peak commuter times, buses could be constantly running back and forth.
- There needs to be more clarity on which tram lines can be driven around (Church Street was identified as particularly confusing). Gradually removing cars altogether from streets with tram lines was also suggested.
- The risk of theft is also a big disincentive to people wanting to take up cycling. The council should look into a scheme of public bike sheds where people can securely leave their bikes, not having to worry about it being stolen.

The risk of theft is also a big disincentive to people wanting to take up cycling.

- Subsidise community transport schemes including school buses
- Look at best practice elsewhere eg *Birmingham Big Bike scheme* (Giving bikes to individuals that don't normally cycle and teaching them how to cycle)
- Expand tram system so it extends to the whole borough
- More bike storage on streets
- More electric charging points
- Lobby for cheaper transport
- Better travel during peak times, tram extensions
- 20mph speed limits
- Ban cars in central Croydon and pedestrianise the Town Centre
- Buses with less seating for shorter journeys possibly shuttle type operation (airport bus style) more able to accommodate luggage, shopping bags, pushchairs etc.
- Make buses, electric / hydrogen cell
- Expand rental bikes
- Close off roads to help with walking
- Incentivise no car days
- Make roads less scary for cyclists, reduce speed limits, car free bike routes.
- Electric busses - V2G systems from Honda
- Have signs around Croydon which show how long a distance to a location is and make people aware of driving vs walking times
- Limit car idling, especially in school areas.
- Electric scooters should be on the road. Also there should be scooter hire/ rentals just like Boris bikes.

Look at best practice elsewhere, eg Birmingham Big Bike scheme



Encourage and incentivise green behaviour

- Use data and knowledge to link people up/ facilitate community action/ provide information to relevant groups
- Ring-fence tax for environment
- Reduction in council tax bill or business rates if you take part in a green initiative (or other tax incentives)
- Innovate - generate income not just through tax and encourage green business
- Create green *street champions*
- Give incentives to recycle eg more free waste bags for food waste
- Introduce sharing schemes where individuals can borrow equipment they might not want to buy outright (eg lawnmowers) and then return it for other residents to use. This would reduce the amount of new material being consumed by the borough whilst also saving residents space and money.

Introduce sharing schemes where individuals can **borrow equipment** they might not want to buy outright

Better enforcement

- Punish super market wastage and poor business practice
- Instant fines for car-idling
- Get litterers to do community service eg give them litter pickup duty

Be more green-minded in decision-making including planning

- When opening new council services (e.g. leisure centres, libraries etc), the council should make sure they are in areas which are easily accessible by walking or at least by public transport to the people who will use them. The goal should be to make sure that nobody needs to drive to benefit from local services and amenities. The "pram-walk" test was suggested here: could a parent pushing a pram easily reach this location?
- The council should, both through its own building and when considering planning applications, consistently prioritise or even require the highest environmental standards (energy efficiency and building materials were identified as important factors).
- The council should look to equip existing and new buildings with solar panels where viable - this could help create a solar network within Croydon producing clean energy for residents and businesses within the borough.
- Tree planting and new green spaces should also be explored as a significant part of planning new developments.
- Be more commercially green i.e. invest in hemp
- Build green social housing



- Long term planning not short term
- Incentivise the use of smart tech in homes
- Be bold - i.e. all new housing - "a right to green space"
- Fewer incinerators
- Have a woodland burial site in Croydon
- More efficient bin collections
- Create more green spaces
- Promote Croydon as a 'Green Centre'



Raise awareness and engage more widely

- The council needs to communicate better when acting against fly-tipping and other anti-social practices. The use of physical letters, and local or building noticeboards was agreed as a good way of reaching as many people as possible.
- Be more open and transparent about targets and whether they have been reached or not
- Education about all the themes - waste management, transport, energy efficiency, smart technology
- Make it clear what needs to be recycled
- More engaging information leaflets
- Tap into the political awareness created by Brexit debate and divert it to environmental issues
- Use real phrases and language and not so much jargon like "tipping point" people have to relate to the issues.
- Make sure people are aware about what can and can't be recycled
- Recognise the 'doom' and 'denial' modes when communicating to people about this issue
- Big fun days/family day outs raising awareness on green issues

Work in partnership

- The council should work with all businesses and public bodies (eg NHS) to promote sustainability
- Surrey Street Market was singled out as a good opportunity to support good environmental practice whilst helping local businesses. The council could work with vendors (perhaps through subsidies) to eliminate plastic from the market
- Encourage partners to host / facilitate community meetings

The **council** could **work with vendors** (perhaps through subsidies) to **eliminate plastic from the market**

4 SESSION 3: Taking action to tackle climate change

4.1 Overview of the session

The agenda for this session covered the following key elements:

Presentations

- *"How your views will inform the Climate Crisis Commission"*
Dr Alex Chapman (New Economics Foundation)
- *"Inspiring Action"*
Alethea Warrington (Possible – formerly 10:10 Climate Action)
- *Thank you and next steps*
Cllr Alison Butler, Deputy Leader

Table discussions]

- **Table discussion 1: What the Assembly thinks – agreeing an Assembly position statement**
- **Table discussion 2: What's most important to you? – prioritising actions raised at the last session**
- **Table discussions 3 & 4: Deep dive discussions on "Tackling transport and improving air quality" and "Community action on raising awareness"**



4.2 What the Citizens' Assembly said

The position statement below reflects the outcome of the deliberations of the Assembly which has been agreed by Assembly members.

CROYDON CITIZENS' ASSEMBLY ON CLIMATE CHANGE: OUR VIEWS

- 1 We support the Council's decision to take action on climate change.
- 2 We believe that Croydon has a great opportunity to be one of the first to act and develop some trail blazing solutions.
- 3 We believe that the issue is too big for anyone to do on their own so we call on the Council to show leadership and act as a role model collaborating with others including businesses, the NHS, the voluntary sector, communities and special interest groups (eg the *London Cycling Campaign*, *Ramblers*, *Friends of the Earth* etc) to develop concerted and co-ordinated action.
- 4 We are prepared to take action ourselves on climate change but this will be boosted if the Council also leads by example by considering the following:
 - **Building climate impact into everything it does (commissioning, operating etc)**
 - **Educating and encouraging its staff to become Workplace Environmental Protection Officers, advocates and champions for climate action**
 - **Supporting businesses, landlords and residents to take action**
 - **Lobbying for more action from Government, the Mayor of London and other bodies**
 - **Using its influence within Croydon to encourage all agencies to adopt action plans**
- 5 We believe that many people are put off taking action on the climate because the information is confusing. We believe that we need a set of simple, understandable measures to chart our progress in Croydon.
- 6 We believe that education and awareness around the issue cannot start too early. We therefore call for an extensive programme in all the borough's schools as a central part of the syllabus rather than an optional bolt-on. Colleges, training establishments and centres of adult education also have an important role to play.
- 7 We want to see clearer and more regular feedback on the impact being made on the issue.
- 8 We believe that there is a great opportunity to embrace and harness new technology to provide solutions to some of the challenges we face. Putting Croydon at the forefront of this will help to make this a centre for jobs and innovation and will promote Croydon as a future facing place to live and work.
- 9 We want to see local business (particularly small and medium sized enterprises) rewarded if they sign up to environmentally friendly policies.

- 10 Businesses and residents should be involved in discussions about the cost and payment schemes for environmental plans.
- 11 We want the majority of socially responsible residents supported and recognised for contributions they make. We also want to see those who let us down identified and penalised.
- 12 Action on climate must go hand in hand with measures to make the place cleaner, greener and safer.
- 13 Young people are key - we want to see them taking a central role.
- 14 We are open to the idea of charging people at a reasonable level who have highly polluting cars more on condition that efforts are made to improve public transport and those who adopt greener solutions (like walking, cycling, car sharing and electric vehicles are rewarded). But above all we want to see fewer cars in total on the borough's roads with shorter journeys in particular being cut.
- 15 We believe that the scale and speed of action required to tackle the climate challenge will need a whole community approach.
- 16 We understand that Croydon faces a housing crisis and it needs to build more homes especially affordable housing for local people who are unable to find suitable accommodation. We call on the Council to develop a set of principles and regulations that will ensure that additional homes do not compromise the commitment to a greener, cleaner and more attractive borough. Making better use of existing housing stock that is empty or under-used would help in this respect.
- 17 The key priority areas for this are: transport, air quality, energy use and awareness and engagement.
- 18 We do not believe that currently, Croydon residents are sufficiently aware, engaged or equipped to play the central part needed in this change. Addressing this should therefore be a major priority.
- 19 We support a community advocate programme that will train and support residents to be help their communities effect change.
- 20 The spaces, networks, organisations and expertise that the borough has should be identified and co-ordinated to provide maximum environmental impact.
- 21 Waste and recycling is an important aspect of the environmental challenge as most people should be responsible for it. Information and action is needed to enforce good practice and take measures to penalise those who do not act responsibly.
- 22 We are pleased to hear that the *Climate Crisis Commission for a Sustainable Croydon* has been set up and that residents' voices will be represented on this. We would like to see work from the Council and the Commission begin as soon as possible (we think some action can be taken immediately) and for residents' to be formed and engaged in this important area.

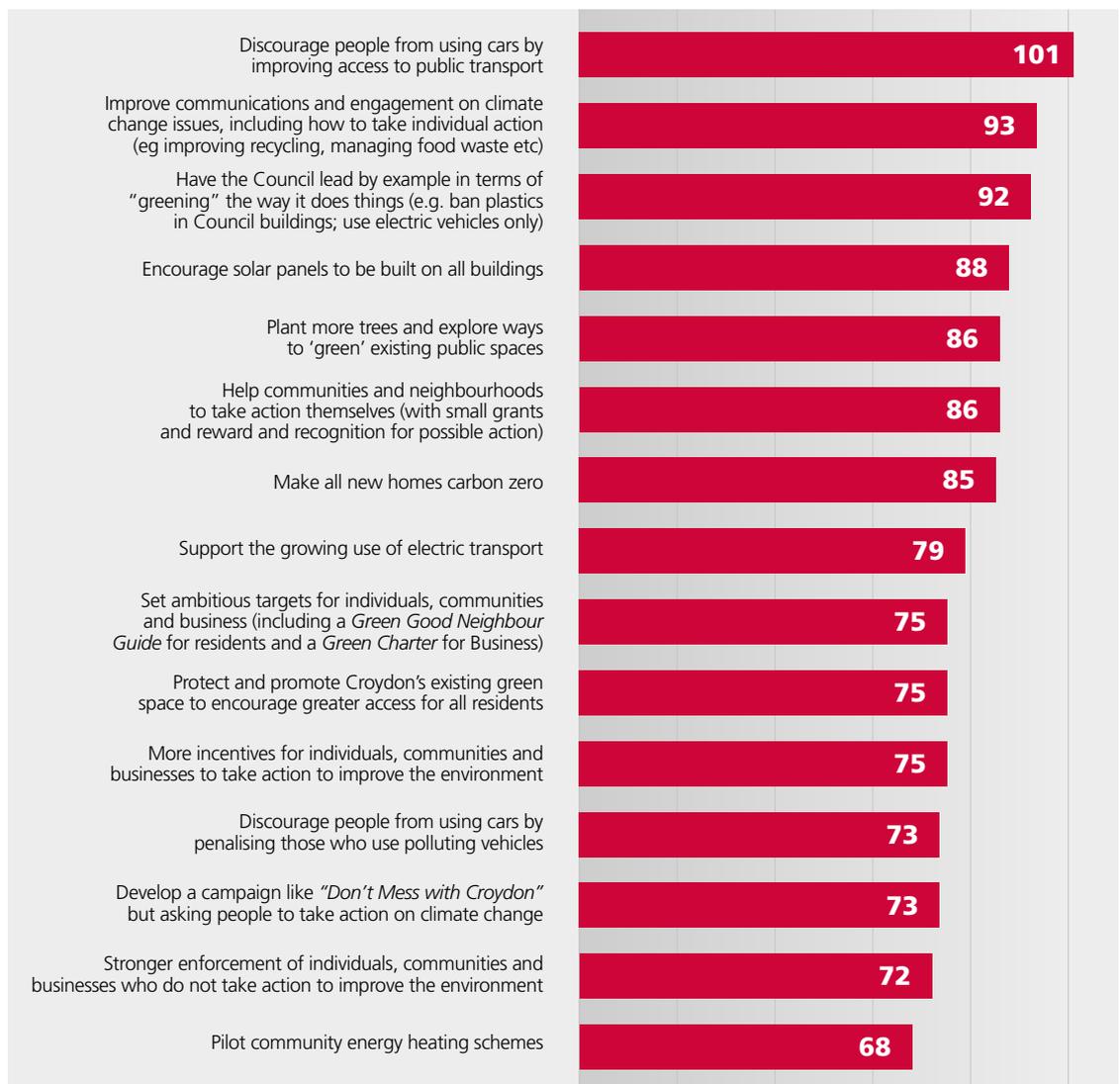


4.3 Prioritising council actions raised at the last session

The previous meeting had helped develop concrete actions that could realistically be taken by the council to act on the climate crisis. Members were asked in this meeting to label each action a first, second or third priority. In order to calculate the total level of prioritisation, these priorities were then reversed (so first preferences were counted as 3, and third preferences as 1) and summed up.



- The graph below shows the results of this exercise, demonstrating a clear preference for incentive-based actions rather than enforcement, creating a standard of practice in which residents find it easy to make the environmentally conscious choice.



4.4 Deep dive discussions on council priorities

In the previous meeting, members discussed various measures to tackle the main priority areas the council had identified. This discussion was intended to develop a sense of what disincentives or enforcement actions they were willing to put up with, and consider the most effective incentives.

Tackling transport and improving air quality in communities

This was the most commonly mentioned issue in discussions throughout. It was recognised that Croydon's transport infrastructure is an asset across the borough. However, a significant number of people are still reliant on carbon-emitting cars - especially for short journeys. So how can people be encouraged to change their behaviour? Assembly members have already raised a list of measures to address this challenge (summarised in the table below)

It was **recognised** that **Croydon's transport infrastructure** is an **asset** across the borough

There was broad consensus on the incentives listed, with several groups noting the importance of keeping people onside through positive rather than punitive actions.

- Fines in particular were criticised as most damaging for those with the fewest means, and often regarded as unnecessary. One potential alternative would be to pay fines into an environmental fund, or replace it with a form of community service on an environmental project. A minority saw the value of fines in making cleaner transport options more attractive.
- Any punitive actions would only be fairly introduced after a concurrent push on awareness
- General understanding that any punitive measures against drivers would affect the poorest most, and would face difficulty winning support if not explicitly tied to a specific, popular and relevant incentive.
- Awareness of council's limited power, and many unanswered questions about how it can campaign for central government to provide incentives for electric car use.



THE INCENTIVES

More and safer cycling lanes

There was general agreement that this is a reasonable trade-off with decreased car traffic. Some members argued that any further uptake of cycling will only happen once infrastructure is in place. Safety as well as connectedness were a priority here, with increased pavement coverage allowing for segregated cycle lanes.

Encouraging car-pooling and car-sharing (eg car-sharing lanes)

This proposal was relatively popular, though there was no concrete sense of whether members would consider car-pooling themselves.

One member brought attention to the integration of BlaBlaCar into Google Maps in some European cities like Barcelona. Another mentioned the potential for car-pooling commuters travelling from the south coast.

Pedestrianisation of areas

Pedestrianisation was seen as an inevitable part of other developments in central Croydon, including Westfield. There was general acceptance of this as a positive, but one group felt planning incentives to make more journeys on foot had to be paired with more visible policing.

Clean air zones (eg around schools)

There was general enthusiasm for this measure, including piloting car-idling fines, and increasing public awareness with a street-by-street air quality information app.

Several groups also mentioned the potential effectiveness of negative advertising akin to cigarette packs. Using vivid, grotesque imagery would be more likely to make the effects of pollution hit home more.

THE DISINCENTIVES

Close roads to cars

This suggestion was treated with caution by most groups. While some noted the success of such measures around schools, others suggested that this usually moved traffic elsewhere rather than taking cars off the road. That said, one group was enthusiastic about further experimentation with the "Play Streets" concept.

Any road closures must be tied to assurances for small businesses, delivery companies, postal services, and those with disabilities and limited mobility.

Restrict or remove parking

Most felt this was not a realistic option until transport links across the borough had improved dramatically and the proliferation of Park & Rides increased.

Certain types of shopping require closeby dedicated parking, such as more residential areas like Purley Way. In the face of Croydon developments, there is also the question of what will happen to existing car parks.

Fines for car-idling

These fines were viewed as impractical, presumably being much harder to police than speeding offences. On top of this, there was a feeling that this may unfairly target older cars which need their engines on to heat the car. Nevertheless, taxi hotspots and schools were felt to be good areas to begin pilots.

Increase parking charges

Increased parking charges were viewed as a necessary evil, but one which could be made far more tolerable if wedded to positive environmental initiatives, such as a green fund, or lowering the cost of tram fares.

As this could have a significant impact on the local economy, it should be carefully applied with a view to encouraging local shopping closer to home, alongside pairing it with free parking days in certain areas.

THE INCENTIVES

Extending tram system

Members were enthusiastic about extending the tram, and saw this as an opportunity to make a distinctly Croydon example to the rest of London. One group proposed an extension to Crystal Palace and Morden. Another group suggested trams could be integrated with a Park & Ride scheme.

Making public transport more affordable

More affordable, as well as reliable, public transport was viewed by many as the basic trade-off of any fiscally punitive measures. Several suggestions were made, including a "short hopper fair" of 90p for a few stops, or reviewing the fairness of free bus pass concessions. One group also mentioned extending Oyster compatibility beyond Zone 6, coordinating bus services with Surrey County Council.

A better infrastructure to support electric vehicles (eg more charging points)

General enthusiasm for this proposal, but alongside an understanding that big impact on this can only be sought by national government subsidies on electric cars.

Some suggestions included establishing an upgrade scheme, especially for those on low incomes with diesel cars, and lobbying national government for incentives and subsidies. One group suggested Croydon bid for the recently announced All Electric Bus Town Scheme.

THE DISINCENTIVES

Pollution charge

Most members felt fiscal punishments were particularly damaging for those on low incomes, especially when there are few alternatives. Above all, many of those driving more polluting cars are older, less mobile or on lower incomes, often having been encouraged to buy diesel cars two decades ago.

An alternative basis of pollution charges was suggested on the basis of number of cars per household, as they would appear to be more capable of paying.

Business / workplace parking charges

No strong feelings on this, but one group suggested Councillors could set an example by forfeiting their Car Parking Pass. Another insisted that commuters need more Park & Rides in place if cars are discouraged from the centre.

Some bigger businesses are keen to create a green image, and could be vulnerable to pressure. For example, businesses with a fleets of cars could move to electric vehicles, creating demand for electric charging infrastructure.



Empowering communities to take action

- There was a strong recognition across Assembly discussions that more can be done to equip communities to take responsibility and action themselves to tackle climate change
- Having been raised several times during the assembly, we wanted to explore the idea of developing community “green” champions to help raise awareness and engage their local neighbourhoods to take action. These could be similar to existing *Street Champions* and *Neighbourhood Watch* volunteers.

We asked members about:

- What would be in the “job description” of a *green champion*?
- How could they be supported to carry out their role? (ie what tools, resources, information might they need?)
- What would encourage people to take on this role? What barriers might there be?

Green Champion role

- Above all, the *Green Champion* must be an independent but constant liaison between residents and the Council, in daily contact with a dedicated council employee to provide research and information.
- There was strong feeling that they must be highly trained and independently accredited, including this on any publicity they use. Some members suggested it was difficult to trust some community groups’ materials. They may also need a clearly identifiable uniform.
- They should be already embedded and trusted by their community. For example, having one per postal sector, supported by local councillors, would be local enough while keeping numbers at a point where they’re accountable? No community can be left out so postal sector may not be only form of segmentation.
- The *Green Champion* must be impartial, enthusiastic, but not evangelical to remain wedded to the community. Frequent speaking opportunities at schools, reporting back to community through leaflets and local newspapers will be necessary.
- They must be well-resourced, including access to venues, litter picking sticks, shovels for tree planting, leaflet budget.
- Clear targets should developed as part of this relationship, started by the Council and made more suitable to a particular community after consultation by the *Green Champion*
- They must have the ability to help secure people council subsidies for green initiatives surrounding the home, e.g. financial support for loft insulation, empowered to contact Veolia to quickly dispose of bulky goods, give away free biodegradable bags.
- Must have experience of event organisation, team management - More broadly bring people into the system and get them hooked on green

Above all, the Green Champion must be an independent but constant liaison between residents and the Council



initiatives, e.g. organising litter picking parties with councillors and local residents, speed tree planting (speed dating with an impact).

- The Council should assist in building initial relationships and monitoring the progress of *Green Champions*, as most people don't have the neighbourly relationships required for this.
- The *Green Champion* could play a role in monitoring green initiatives and claims by local businesses.
- There is robust debate over whether it should be a paid role. Creating a part or full-time post may encourage people to take part who otherwise may not be able to afford to. A large amount of responsibility would lead to it being a full-time job. Others felt payment undermines the cause, and that other incentives would motivate people to participate - e.g. knowledge, guidance, training, support and public recognition - though this comes with a realistic expectation of their capacity. Splitting the role into smaller less time-consuming roles might help, with a separation between voluntary and organisational paid roles.

Splitting the role into **smaller less time-consuming roles** might help

Green Hub

One discussion group also developed their own idea of a *Green Hub*:

- Information point for advice, volunteering opportunities and new green initiatives
- Base camp for the *Green Champion* to hold environmental surgeries
- Could use public space such as libraries, schools at weekends or after school.
- Online entity for discussing green issues
- Pass on embedded knowledge of what has worked and what hasn't about green initiatives, so the Council has a better evidence base.

Finally, some related but more individual points came up in the community discussion:

- People don't know everyone in their neighbourhood as much as in the past - these initiatives should acknowledge this, and act as a new way of bringing people together.
- Recycling still requires better communication from the council, whilst people living in blocks need more support in increasing capacity of recycling bins.
- The key to public education is visual aids - a *green champion* should have access to the best materials available for informing and educating their communities.
- Some people added that the community policing system should be brought in to the fold as well - perhaps on enforcing rules on fly tipping and car idling.
- Regarding community solutions more broadly, some groups agreed that, whatever form community action takes, it must be backed by enough funding to make meaningful change.
- Small, time-limited ways to get involved are necessary. There's a need for a specific timed framework with allocated actions and materials. Any action must be highly structured or people won't do it, while also giving flexibility for creative input.
- There's a generally low awareness of existing schemes. Organisers must be given the tools and knowledge to properly conduct outreach with neighbours and communities to generate interest and take action. Small businesses are particularly good at getting the word out. There's already generally low awareness of *Street Champions*. There's a need to be more connected and visible through public events and engaging with different communities in sometimes unorthodox ways.

A green champion should **have access to the best materials available** for **informing** and **educating** their communities





5 Summary and next steps

“ To be honest, I wasn't sure what to expect before the first meeting but I thought I should come along but this is such an important issue and it was nice to be asked to share my views. I was so glad I came because I absolutely loved these meetings – we had some really interesting speakers and I learnt some new things each time. It was also great to meet and hear the views of others like myself who have lived here most of our lives and who love the place. I also really feel that we've been listened to. Can't wait to see what happens next. ”

Croydon Citizens' Assembly Member

After six weeks of deliberation on this pressing global challenge, the process demonstrated that if the issues are framed correctly in a way that is accessible and relatable there is genuine concern and appetite to get involved. The Assembly validated the investment in such a representative and deliberative exercise by providing evidence of clear priorities for residents; insight into how to communicate and engage effectively and some concrete steps (such as the leadership residents will expect from the council and its partners) that the Council and the independent commission will now need to consider carefully.

The Assembly was broadly representative of Croydon. This meant that the complexity and diversity of the borough played out in its deliberation. Each member of the *Croydon Citizens Assembly* brought their own life experience to bear and had different local circumstances and experiences of Croydon. Alongside this, the entire spectrum of awareness of climate change was present; from the disinterested to the evangelical; sceptics to physics lecturers. The strength of deliberation came through accommodation of these differing experiences, learning styles and expertise on the topic.



The Assembly has not produced a definitive blue print for action. That was never its purpose. It was not established as a task and finish group. Rather it was designed to provide insight into the core themes that residents believe are important and give evidence as to how Croydon should design a truly inclusive and sustainable approach.

There was a distinct appetite and desire to see Croydon taking a lead on the issue and forging a cutting edge, pioneering approach. There was recognition of Croydon's particular opportunity as a fast-developing area with already very good transport links.

Although we did not explicitly engage with young people (under 18s), the Assembly was resolute that their involvement would be key, both as change agents in themselves and to motivate others to get involved. A work strand must be developed to authentically harness young people in the changes proposed.

Finally, the overriding view of the Assembly was that there is a unique opportunity for Croydon to harness the capacity of the community to address the issue. It is almost banal to state it, but the borough's diversity is its strength. Action and engagement around the climate emergency could be a profound catalyst that has a range of collateral benefits within and between communities that go beyond climate change, as important as that is. But it will need investment, creativity and a continued commitment to working with residents to design and deliver it effectively.

It is almost banal to state it, but **the borough's diversity is its strength**



Appendix A: Recruitment process

All Assembly members were recruited face-to-face. TCC researchers ran a street recruitment campaign across different parts of the borough; this was based around train stations, shopping centres, supermarkets and other areas of high footfall. All prospective Assembly members had a conversation on the phone with TCC before their membership was confirmed.

Special emphasis was made to make sure lesser-heard groups were included. Final recruitment was representative of the borough, and the below table shows who eventually attended the Assembly.

| Demographic | Assembly % |
|----------------------------|-------------|
| Male | 45.2 |
| Female | 54.8 |
| 16-24 | 9.5 |
| 25-34 | 16.7 |
| 35-44 | 26.2 |
| 45-54 | 26.2 |
| 55-64 | 9.5 |
| 65-74 | 4.8 |
| 75-84 | 4.8 |
| White | 52.4 |
| Mixed | 7.1 |
| Asian/Asian British | 9.5 |
| Black/Black British | 28.6 |
| Other | 2.4 |



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| | |
|--|--|
| REPORT TO: | CABINET 8TH JUNE 2020 |
| SUBJECT: | INVESTING IN OUR BOROUGH |
| LEAD OFFICER: | SARAH WARMAN, DIRECTOR OF COMMISSIONING & PROCUREMENT JACQUELINE HARRIS BAKER, EXECUTIVE DIRECTOR RESOURCES |
| CABINET MEMBER: | COUNCILLOR SIMON HALL CABINET MEMBER FOR FINANCE AND RESOURCES |
| WARDS: | ALL |
| <p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: Effective outcome based commissioning and prudent financial transactions contribute to all corporate priorities.</p> <p>The Council's Commissioning Framework (2019 – 2023) sets out the approach to commissioning and procurement and puts delivery of outcomes at the heart of the decision making process. As the Council develops more diverse service delivery models, it is important to ensure that our contractual and partnership relationships are not only aligned to our corporate priorities but also represent value for money for citizens and taxpayers, contributing to the growth agenda for Croydon.</p> | |
| <p>FINANCIAL SUMMARY: There are no direct costs arising from this report.</p> | |
| <p>KEY DECISION REFERENCE NO.: There are key decisions mentioned in this report, but approval of the Recommendations would not constitute a key decision.</p> | |

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1 RECOMMENDATIONS

1.1. The Cabinet is requested to note:

1.1.1. The list of decisions pursuant to Part 5 A Article 1.7 (Urgency Decisions) of the Council's Constitution, made as relevant body by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated member is the Cabinet Member for Finance and Resources in consultation with the Leader, as set out in section 4.1.

1.1.2. The list of delegated decisions for contracts and property acquisitions and disposals valued over £500,000 and that have not previously been notified or reported to Cabinet, made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated member is the Cabinet Member for Finance and Resources

in consultation with the Leader, to agree the award of such contracts, Leader since the last meeting of Cabinet, as set out in section 4.1.1.

1.1.3. The contracts between £500,000 and £5,000,000 anticipated to be awarded by the nominated Cabinet Member, in consultation with the nominated Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader, as set out in section 4.1.2.

2 EXECUTIVE SUMMARY

2.1 This is a standard report which is presented to the Cabinet, for information, at every scheduled Cabinet meeting to update Members on:

- Delegated decisions for contracts and property acquisitions and disposals valued over £500k made by to the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
- Contracts between £500,000 and £5,000,000 anticipated to be awarded under delegated authority from the Leader by the nominated Cabinet Member, in consultation with the Cabinet Member for Finance and Resources and with the Leader in certain circumstances, before the next meeting of Cabinet;
- Pursuant to Part 5 A Article 1.7 (Urgency Decisions) of the Council's Constitution, the list of decisions made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated member is the Cabinet Member for Finance and Resources in consultation with the Leader.
- Delegated contract award decisions made by the Director of Commissioning and Procurement 18/04/2020 – 17/05/2020;
[As at the date of this report there are none].
- Delegated decisions made by the Cabinet Member for Homes & Gateway Services, in consultation with the Cabinet Member for Finance & Resources, under delegated authority from the Leader, to approve the purchase of properties in relation to the HRA;
[As at the date of this report there are none].
- Property lettings, acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
[As at the date of this report there are none].

- Delegated contract award decisions under delegated authority from the Leader by the Cabinet Member for Families, Health & Social Care in consultation with the Cabinet Member for Finance & Resources related to the Adult and Young People Social Care Dynamic Purchasing Systems (DPS);
[As at the date of this report there are none].
- Contract awards and strategies to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item;
[As at the date of this report there are none].
- Delegated contract award decisions under delegated authority from the Leader by the Cabinet Member for Environment Transport & Regeneration in consultation with the Cabinet Member for Finance and Resources related to the New Addington Wellbeing Centre project for the Lead Architect and Multi-disciplinary Professional Services;
[As at the date of this report there are none].
- Delegated contract award decisions under delegated authority from the Leader by the Cabinet Member for Children, Young People and Learning in consultation with the Cabinet Member for Finance and Resources related to the Addington Valley Academy SEN School for the construction of works.
[As at the date of this report there are none].
- Partnership arrangements to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item.
[As at the date of this report there are none].

3 DETAIL

- 3.1 Section 4.1.1 of this report lists decisions under urgency provision due to COVID impacts for contract awards, variations, and extensions between £500,000 to £5,000,000 made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
- 3.2 Section 4.1.2 of this report lists COVID contract awards, variations, and extensions decisions to be made under urgency provisions due to COVID related impacts between £500,000 to £5,000,000 by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

- 3.3 The Council's Procurement Strategy and Tender & Contracts Regulations are accessible under the Freedom of Information Act 2000 as part of the Council's Publication Scheme. Information requested under that Act about a specific procurement exercise or contract held internally or supplied by external organisations, will be accessible subject to legal advice as to its commercial confidentiality, or other applicable exemption, and whether or not it is in the public interest to do so.

4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

4.1 Urgency Decisions made under Part 5 A Article 1.7 of the Council's Constitution

- 4.1.1 COVID related reports for contract awards, variations, and extensions between £500,000 to £5,000,000 made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;

| Contract Title | Contract Revenue Budget | Contract Capital Budget | Dept/Cabinet Member |
|---|--|--------------------------------|---|
| Best Start suite of contracts extension | £15,656,000 (Extension length of 12 months) (Increase of £2,810,000) | | Children, Young People & Learning / Cllr Flemming |
| Corporate Cleaning Contract Extension | £7,850,000 (Extension length of 12 months) (Increase of £1,759,000) | | Finance and Resources / Cllr Hall |

- 4.1.2 COVID related reports for contract awards, variations, and extensions decisions to be made between £500,000 to £5,000,000 by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

| Contract Title | Contract Revenue Budget | Contract Capital Budget | Dept/Cabinet Member |
|--|--|--|---|
| Adults Social Care IT System (AIS/SWIFT) Extension | | £513,000 (Extension length 6 months) (Increase of £71,040) | Finance and Resources / Cllr Hall |
| Corporate Security Contract Extension | £4,160,000 (Extension length 12 months) (Increase of £880,000) | | Finance and Resources / Cllr Hall |
| Pay and Display Machines Contract Award | £2,000,000 (Contract length 2 years plus 1 plus 1) | | Environment, Transport & Regeneration / Cllr King |

Approved by: Ian Geary, Head of Finance - Resources on behalf of Lisa Taylor, Director of Finance, Investment and Risk and Section 151 Officer.

5 LEGAL CONSIDERATIONS

- 5.1 The Director of Law and Governance comments that the information contained within this report is required to be reported to Members in accordance with the Council's Tenders and Contracts Regulations and the council's Financial Regulations in relation to the acquisition or disposal of assets.

Approved by: Sean Murphy, Director of Law and Governance and Monitoring Officer.

6 HUMAN RESOURCES IMPACT

- 6.1 There are no immediate HR issues that arise from the strategic recommendations in this report for LBC staff. Any specific contracts that arise as a result of this report should have their HR implications independently assessed by a senior HR professional.

Approved by: Sue Moorman, Director of Human Resources

7. EQUALITY IMPACT

- 7.1 An Equality Analysis process has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.
- 7.2 The equality analysis for the contracts mentioned in this report will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector equality duty (PSED). This requires public bodies to ensure due regard to the need to advance equality of opportunity; foster good relations between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.
- 7.3 Any issues identified through the equality analysis will be given full consideration and agreed mitigating actions will be delivered through the standard contract delivery and reporting mechanisms.

8. ENVIRONMENTAL IMPACT

- 8.1 Any issues emerging in reports to the relevant Cabinet member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

9. CRIME AND DISORDER REDUCTION IMPACT

- 9.1 Any issues emerging in reports to the relevant Cabinet Member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

10. DATA PROTECTION IMPLICATIONS

- 10.1 Will the subject of the report involve the processing of ‘personal data’?

NO

- 10.2 Has a Data Protection Impact Assessment (DPIA) been completed?

NO

Data Protection Impact Assessments has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.

Approved by: Sarah Warman, Director of Commissioning & Procurement

CONTACT OFFICER:

| | |
|----------------------|---|
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BACKGROUND DOCUMENTS:

The following public background reports are not printed with this agenda, but are available as background documents on the Croydon Council website agenda which can be found via this link [Cabinet agendas](#)

- *Best Start suite of contracts extension*
- *Corporate Cleaning Contract Extension*
- *Adults Social Care IT System (AIS/SWIFT) Extension*
- *Corporate Security Contract Extension*
- *Pay and Display Machines Contract Award*

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