

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 & Regeneration (non-acting – Job Share)
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON	
<p><i>Include here a brief statement on how the recommendations address one or more of the Council's Corporate Plan priorities:</i></p> <p><u>Corporate Plan for Croydon 2018-2022</u></p> <p>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.</p>	

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 Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below
1. RECOMMENDATIONS <p>Cabinet is asked to recommend that Full Council:</p>

- 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 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 Note: This stage may not be required	+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 See 'Risks' below.
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. See 'Risks' below
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 See 'Risks' below
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