

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

C77	Resident E of Kingston
C78	Days Aggregates (FirstPlan acting as agent)

LIST OF REPRESENTATIONS

Rep No	Consultee (with number)	Representation	Officer Response
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

	<p>(C3)</p>	<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>	<p>with below.</p>
<p>3</p>	<p>The Mayor of London/GLA (C6)</p>	<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>	<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</p>

	<p>The draft new London Plan</p> <p>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.</p> <p>General</p> <p>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.</p> <p>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</p>	<p>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.</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>(2) Noted. The boroughs will investigate further the suitability of existing sites for intensification.</p> <p>(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</p>
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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	Transport for London (C7)	<p>Vision</p> <p>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>

	<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>	<p>Servicing Plans and Tram Infrastructure.</p>
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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

		<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	Group Director of Curley Skip Hire & Waste Recycling Ltd (C12)	<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>	Noted.
7	Merton Conservatives (C16)	<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>	(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>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>

	<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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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>

		<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>

		<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>

		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

	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

	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.

		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)

			<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>

		<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>

		<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>

			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

<p>40</p>	<p>Group Director of Curley Skip Hire & Waste Recycling Ltd (C12)</p>	<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>	<p>Noted.</p>
<p>41</p>	<p>Surrey County Council (C18)</p>	<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>

			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.

		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.

		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.

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

		<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.

	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

87	Resident B of Kingston (C74)	Vision - The proposed building and re-development plans are outrageous and TOTALLY unsupported 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>

		<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>

		<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>

		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.

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.

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.

	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>

		assessed.	
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			
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.

		<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>

		<p>waste streams, which may fall under this definition.</p>	<p>small amounts of permitted radioactive wastewater to the sewer. There are no solid transfers of this type of waste in any of the facilities.</p> <p>(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.</p> <p>(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.</p>
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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

		<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>

		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.

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.

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

		<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.

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 throughout 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>

	<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>

	<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.

	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.

		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.

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>

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>

		<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.

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.

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.

	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.

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.

		<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>

		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.

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.

	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.

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

		<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>

		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.

	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.

	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.

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.

		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.

	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.

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.

	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.

		<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>	<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.</p>
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.

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.

	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

			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.

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.

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			
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.

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>

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.

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.

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>

	<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>	<p>site.</p>
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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 SI10, ‘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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	<p>existing, planned or potential capacity for transportation, distribution, processing and /or production of primary and/or secondary/recycled aggregates.’</p> <p>(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.’</p> <p>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.</p> <p>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.</p> <p>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”.</p> <p>4. Response to Issues and Preferred Options Consultation <u>i) WP2 – Strategic Approach to Other Forms of Waste</u> 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’</p>	
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	<p>figures. Figure 15 makes it clear that it is the ‘throughput counting towards apportionment’ column which is used to measure capacity.</p> <p>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’.</p> <p>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.</p> <p>(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).</p> <p>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.</p> <p>(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.</p> <p>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</p>	
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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.

	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.

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.

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.

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.

	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

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.

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.

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.

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.

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			

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>

	<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 <i>...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...</i> Furthermore, Clause 2.3.3 of the Permit makes clear that <i>"no waste shall be accepted for disposal at the site"</i> (Council's emphasis).</p> <p>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.</p> <p>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,</p> <p>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.</p> <p>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</p>	
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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	<p>Claygate Parish Council (C15)</p>	<p>Existing Permit at Chessington Equestrian Centre (appended)</p> <ol style="list-style-type: none"> 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. 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. 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. 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.</p>

		<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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	<p>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.</p> <p>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.</p> <p>11. The above issues (Items 7 – 10) would be resolved if</p> <ul style="list-style-type: none"> (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 <p>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.</p> <p>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.</p> <p>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</p>	
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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>

		<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.

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.

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.

	(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.

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>

	<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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	<p>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.</p> <p>[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.</p> <p>[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)</p> <p>[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</p>	
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	<p>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.</p> <p>[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.</p> <p>[9] The three plants mentioned above on the Durnsford industrial site are licensed</p>	
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		<p>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.</p> <p>[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.</p> <p>[11] To rectify these problems the following steps should be undertaken.</p> <ul style="list-style-type: none"> - 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. <p>[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</p>	
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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.

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

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.

	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.

	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.

		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.

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.

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.

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.

	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.

	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.

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.

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.

	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.

		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>	<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.</p>
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>	<p>Noted. The Councils will make the necessary amendments to the safeguarded sites.</p>

		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.

	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.

	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>

			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.

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.

	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>

			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.

	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>

		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.

	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

		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.

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.

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.

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>

			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

	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.	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. 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

			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.

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.

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.

		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.

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.

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 prejudicial 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.

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.

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.

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.

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.

		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.

	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.

	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.

		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.

	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.

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.

		<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>

		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.

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.

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.

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.

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

	(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.

	<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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	<p>transport during some of the less congested hours.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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). <p>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.</p>	
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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.

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			
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>

	<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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