South London Waste Plan

Issues and Preferred Options
Consultation Document

October 2019
The Consultation

This is a consultation document for the development of updated policies and site safeguarding in the South London Waste Plan 2012. This document is updated version of the currently adopted Waste Plan and additionally includes captions and questions to as a prompt to help with the consultation.

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

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

**Consultation dates**

Thursday, 31st October- Sunday, 22nd December 2019

Copies of the document and evidence are available;

https://www.croydon.gov.uk/planningandregeneration/framework/localplan/slwaste-plan

www.kingston.gov.uk

www.merton.gov.uk

www.sutton.gov.uk/currentconsultations

List of locations where copies of the documents are available;

- xxxx
- xxxx
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C1 Able Waste Services, 42 Imperial Way, Croydon 00
C2 Croydon Car Spares, 111 Aurelia Road, Croydon 00
C3 Curley Skip Hire, Rear of 64 Northwood Road, Croydon 00
C4 Days Aggregates Purley Depot, Approach Road, Croydon 00
C5 Factory Lane Waste Transfer Station, Factory Lane, Croydon 00
C6 Fishers Farm Civic Amenity Site, North Downs Road, Croydon 00
C7 Henry Woods Waste Management, Land adj to Unit 9, Mill Lane Trading Estate, Croydon 00
C8 New Era Metals, 51 Imperial Way, Croydon 00
C9 Pear Tree Farm, Featherbed lane, Croydon 00
C10 Purley Oaks Civic Amenity Site, Brighton Road, Croydon 00
C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon 00
K1 Chessington Equestrian Centre, Clayton Road, Kingston 00
K2 Genuine Solutions Group, Solutions House, Unit 1A, 223 Hook Rise South, Kingston 00
K3 Kingston Civic Amenity Site, Chapel Mill Road, off Villiers Road, Kingston 00
K4 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston 00
<p>| | |</p>
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<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td><strong>M1</strong></td>
<td>B&amp;T@Work, Unit 5c, Wandle Way, Merton</td>
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<td><strong>M2</strong></td>
<td>European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton</td>
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<td><strong>M3</strong></td>
<td>Deadman Confidential, 35 Willow Lane, Merton</td>
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<td><strong>M4</strong></td>
<td>Garth Road Civic Amenity Site, 66-69 Amenity Way, Garth Road, Merton</td>
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<td>Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton</td>
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<td><strong>M6</strong></td>
<td>George Killoughery Ltd, 41 Willow Lane, Merton</td>
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<td><strong>M7</strong></td>
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<td>LMD Waste Management, 32 Willow Lane, Merton</td>
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<td>Maguire skips, Storage Yard, Wandle Way, Merton</td>
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<td>Maguire Skips, 36 Weir Court, Merton</td>
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<td>Morden Transfer Station, Amenity Way, Merton</td>
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<td>NJB Recycling, 77 Weir Road, Merton</td>
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<td><strong>M13</strong></td>
<td>One Waste Clearance, Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton</td>
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<td><strong>M14</strong></td>
<td>Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton</td>
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<td><strong>M15</strong></td>
<td>Riverside AD Facility, 43 Willow Lane, Merton</td>
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<td><strong>M16</strong></td>
<td>Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton</td>
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<td><strong>M17</strong></td>
<td>UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton</td>
</tr>
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<td><strong>M18</strong></td>
<td>Wandle Waste Management, Unit 7, Abbey industrial Estate, Willow Lane, Merton</td>
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<td><strong>S1</strong></td>
<td>777 Recycling Centre, 154a Beddington Lane, Sutton</td>
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<td><strong>S2</strong></td>
<td>Beddington Farmlands Energy Recovery Facility, 105 Beddington Lane, Sutton</td>
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<td><strong>S3</strong></td>
<td>Cannon Hygiene, Unit 4, Beddington Lane Ind Estate, 109-131 Beddington Lane, Sutton</td>
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<td><strong>S4</strong></td>
<td>Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton</td>
</tr>
<tr>
<td><strong>S5</strong></td>
<td>Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton</td>
</tr>
<tr>
<td><strong>S6</strong></td>
<td>Hydro Cleansing, Hill House, Beddington Farm Road, Sutton</td>
</tr>
<tr>
<td><strong>S7</strong></td>
<td>Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton</td>
</tr>
<tr>
<td><strong>S8</strong></td>
<td>King Concrete, 124 Beddington Lane, Sutton</td>
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<td><strong>S9</strong></td>
<td>Premier Skip Hire, Unit 12, Sandiford Road, Sutton</td>
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<td><strong>S10</strong></td>
<td>Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton</td>
</tr>
<tr>
<td><strong>S11</strong></td>
<td>TGM Environmental, 112 Beddington Lane, Sutton</td>
</tr>
<tr>
<td><strong>S12</strong></td>
<td>Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton</td>
</tr>
</tbody>
</table>

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

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

**Appendix 3** Glossary
The South London Waste Plan – What it is

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

The South London Waste Plan is a joint Development Plan Document and will form part of the Development Plans for the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton.

Most adopted plans within a borough’s Development Plan, such as a Local Plan or Core Strategy, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies of the Mayor of London’s London Plan, which is also part of the Development Plan. Therefore, for the development of a waste facility, a number of adopted plans and supplementary planning documents will have to be consulted.

For further information, in the first instance, visit the planning policy pages of the relevant borough’s website:

https://www.croydon.gov.uk/planningandregeneration/framework
www.kingston.gov.uk
www.merton.gov.uk
www.sutton.gov.uk/planningpolicy

The London Plan can be accessed at:
www.london.gov.uk
Introduction

Background

The four south London boroughs of Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In 2007, the four boroughs decided to plan for waste collaboratively and produce a joint Development Plan Document, covering the principal types of waste such as household, commercial and industrial and construction and demolition waste. This resulted in the production of the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. This draft waste plan updates the 2012 waste plan and is anticipated to be adopted in 2021. It will then cover the planning period 2021 to 2036.

The South London Waste Plan sets out the partner boroughs’ long-term vision, spatial strategy and policies for the sustainable management of waste over the next 15 years. Policies and site safeguarding set out in detail how the four boroughs will meet their waste management targets and limit the impact of waste facilities.

The South London Waste Plan boroughs should prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008, as amended). This plan must set out an analysis of the current waste management situation and future forecasts, an assessment of the need for waste installations, location criteria for sites and policies.

The “National Planning Policy for Waste” (NPPW), published in 2015, sets out the Government's waste planning policies which all Waste Planning Authorities must have regard to when developing local waste plans. The NPPW is supplemented by the “Planning Practice Guidance” section on waste which provides further detail on how to implement the policies.

The NPPW states that Waste Planning Authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

Planning for Waste

The Waste Hierarchy

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

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

National Drivers

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

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

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

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

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

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

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

X.x In order meet the apportionment and targets, the Draft London Plan requires boroughs to:

- Safeguard existing sites
- Optimise the waste management capacity of existing sites
- Provide new waste management sites where required.
- The waste management capacity of existing sites should be optimised, and
- Environmental, social and economic benefits from waste and secondary materials management should be created
Local Drivers

X.x The South London Waste Plan is driven by the need to meet its Draft London Plan targets and apportionments and the sustainable development aim to provide enough waste capacity to manage the waste it generates.

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

- Safeguard existing, operational waste sites
- Encourage the intensification of appropriate sites to meet the Construction and Demolition waste stream capacity shortfall
- Not plan for other waste streams as either the waste stream is so small as to be insignificant or the capacity is sufficient already
- Write to all the existing waste operators to be certain about their future operational plans
- Write to those Waste Planning Authorities which manage significant quantities of waste originating in South London to ensure that that waste management will continue
- Carry out a Sustainability Appraisal of the preferred approaches and alternative approaches
The Sustainability Appraisal

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

Equalities Impact Assessment

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

Duty to Cooperate

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

X.x  Draft wording to be confirmed
Vision and Objectives

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

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

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

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

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

- Meet the Draft London Plan target for Household and Commercial and Industrial Waste
- Safeguard existing waste sites to meet these targets and needs on existing sites
- Ensure there is sufficient land for other industrial uses with the South London Waste Plan area’s industrial estates
- Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity
- Ensure the effects of new development are mitigated and, where possible, enhance amenity

**Question Objectives** Do you agree with the draft Objectives?
WP1 Strategic Approach to Household and Commercial and Industrial Waste

London Plan Arisings and Apportionment Targets

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

- **Waste produced per person**

- **5% reduction for increased waste management efficiency/circular economy gains**

- **Borough arising**

\[
\text{Waste produced per person} \times \text{GLA Demography Borough Population Forecast} + 5\% \text{ reduction for increased waste management efficiency/circular economy gains} = \text{Borough arising (in tonnes per annum)}
\]

Figure 1 Calculation of Household Waste Arisings

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

- **Waste produced per employee by economic sector**

- **GLA Borough Employment Forecast by sector**

\[
\text{Waste produced per employee by economic sector} + \text{GLA Borough Employment Forecast by sector} = \text{Borough arising (in tonnes per annum)}
\]

Figure 2 Calculation of Commercial and Industrial Waste Arisings

However, the Mayor of London then redistributes portions of the borough arisings between boroughs, giving those boroughs he considers have more scope to manage waste a higher waste management target (or apportionment) and those he considers has less scope to manage waste a lower waste management target. The Mayor used the following criteria for apportioning or redistributing waste between boroughs: existing waste facilities and industrial land, arisings in a borough, presence of railheads and wharves, proximity to major routes, restrictive land designations (such as heritage or biodiversity), flood risk and socio-economic factors. The South London Waste Plan boroughs objected to these criteria at the Draft London Plan Examination-in-Public on the grounds that the criteria did not take account of whether industrial land was vacant or occupied and the socio-economic factors were unfounded (see [https://www.london.gov.uk/sites/default/files/m69_rb_kingston_2607_lb_croydon_5622_lb_merton_2565_lb_sutton_2044.pdf](https://www.london.gov.uk/sites/default/files/m69_rb_kingston_2607_lb_croydon_5622_lb_merton_2565_lb_sutton_2044.pdf)).
In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generate.

## Existing Capacity

Appendix 1 shows the existing capacity for waste management across the four South London Waste Plan boroughs. The figures have been calculated by Anthesis consultants for the four boroughs and what constitutes waste management and what sort of facilities provide waste management are set out in Figure 4.

### Figure 3 Arisings and Apportionment at 2021 and 2036 (tonnes per annum)

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

In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generate.
South London Capacity (2019)  
946,345 tonnes per annum

South London Target (2036)  
929,750 tonnes per annum

South London Oversupply  
+16,595 tonnes per annum

Approach to Meeting the Target

Since the four South London Waste Plan boroughs have sufficient waste management capacity to meet their 2036 target, it is proposed to safeguard the existing sites and allow the intensification of the existing sites where appropriate. Unlike the previous South London Waste Plan, the sufficient existing capacity means that the boroughs have no need to identify additional sites for waste management and no need to identify areas which may be suitable for waste management. As all the boroughs have a high demand in their industrial areas for other employment-generating uses, this is especially important for the South London Waste Plan boroughs. With industrial land in high demand, the South London Waste Plan boroughs do not want to be sterilising sites in industrial areas from other employment uses by unnecessarily designating waste sites.

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

(a) The boroughs of the South London Waste Plan will work with the waste management industry to monitor the need for waste capacity.

(b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the Draft London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.

(c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging intensification of these sites (see Policy WP3).

(d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).
WP2 Strategic Approach to Other Forms of Waste


Construction and Demolition Waste

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

Nevertheless, consultants Anthesis have produced a forecast of Construction and Demolition Waste for the South London Waste Plan boroughs and this is set out in Figure 6.

Figure 6 Construction and Demolition Waste Arisings and at 2021 and 2036 (tonnes per annum)

<table>
<thead>
<tr>
<th>Borough</th>
<th>2021 Arisings</th>
<th>2036 Arisings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>292,970</td>
<td>304,695</td>
</tr>
<tr>
<td>Kingston</td>
<td>37,887</td>
<td>39,040</td>
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<tr>
<td>Merton</td>
<td>47,975</td>
<td>54,038</td>
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<tr>
<td>Sutton</td>
<td>15,667</td>
<td>16,607</td>
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<td><strong>TOTAL</strong></td>
<td><strong>394,499</strong></td>
<td><strong>414,380</strong></td>
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</table>

Appendix 1 shows the existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and it shows there is a shortfall not only for the 2036 forecast but also for the 2021 forecast. The exact figures are set out in Figure 7.

Figure 7 Capacity, Forecast and Shortfall for Construction and Demolition Waste

- **South London Capacity (2019)**: 241,682 tonnes per annum
- **South London Forecast (2036)**: 414,380 tonnes per annum
- **South London Shortfall**: -172,698 tonnes per annum
The South London Waste Plan boroughs consider that the shortfall could easily be remedied on the existing safeguarded sites because:

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

Figure 8 shows the waste facilities which manage Construction and Demolition Waste and how they are underperforming.

### Figure 8  Construction and Demolition Waste Facilities and Throughput Potential (tonnes per annum)

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

* Also manages Household and Commercial and General Waste, which counts towards that apportionment
Figure 7 shows the 172,698 tonnes per annum shortfall at 2036 could be easily eradicated if some of the sites refocused their operations from transfer to management and processed to their maximum throughput achieved over the past five years. Similarly, the shortfall for Construction and Demolition waste management could also be eradicated if some of the facilities processed waste at volumes close to their licensed capacities. The South London Waste Plan boroughs are aware that not all sites will be able to intensify but the boroughs consider there is scope on some of 19 sites in Figure 8 to remove the shortfall. There is also the possibility that market forces may incentivise some waste facilities currently providing the overcapacity in the Household, Commercial and Industrial Waste stream to switch to Construction and Demolition Waste.

Low Level Radioactive Waste

Low Level Radioactive Waste commonly occurs in paper, plastics and scrap metal that have been used in hospitals, research establishments and the nuclear industry. There are currently no facilities for processing such waste within the South London Waste Plan area. However, within the South London Waste Plan area, there are 10 organisations holding 13 permits to keep and use radioactive materials, mainly hospitals, universities and private companies. The Pollution Inventory Dataset (2017) identified small permitted discharges to the sewer from some of the permitted facilities but no solid transfers of this type of waste. Therefore, this evidence places no requirement on the South London Waste Plan boroughs to provide for solid waste management infrastructure.

Agricultural Waste

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

<table>
<thead>
<tr>
<th>Borough</th>
<th>2021 Arisings</th>
<th>2036 Arisings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>9,008</td>
<td>9,193</td>
</tr>
<tr>
<td>Kingston</td>
<td>2,404</td>
<td>2,432</td>
</tr>
<tr>
<td>Merton</td>
<td>4,591</td>
<td>4,685</td>
</tr>
<tr>
<td>Sutton</td>
<td>5,239</td>
<td>5,303</td>
</tr>
<tr>
<td>TOTAL</td>
<td>21,242</td>
<td>21,612</td>
</tr>
</tbody>
</table>

Wastewater

<table>
<thead>
<tr>
<th>Borough</th>
<th>2020 Wastewater treated (m³/year)</th>
<th>2020 Sludge (total dissolved solids/year)</th>
<th>2035 Wastewater treated (m³/year)</th>
<th>2035 Sludge (total dissolved solids/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Croydon</td>
<td>11,179,842</td>
<td>6,309</td>
<td>11,570,942</td>
<td>6,552</td>
</tr>
<tr>
<td>Kingston</td>
<td>10,938,459</td>
<td>5,429</td>
<td>11,378,691</td>
<td>5,666</td>
</tr>
<tr>
<td>Merton</td>
<td>9,657,944</td>
<td>5,685</td>
<td>10,240,412</td>
<td>6,059</td>
</tr>
<tr>
<td>Sutton</td>
<td>21,113,960</td>
<td>11,547</td>
<td>22,545,500</td>
<td>12,366</td>
</tr>
<tr>
<td>TOTAL</td>
<td>52,890,205</td>
<td>28,970</td>
<td>55,735,545</td>
<td>30,643</td>
</tr>
</tbody>
</table>
The four boroughs are served by Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works. Thames Water has informed the consultants Anthesis that these works all have adequate capacity to manage the incoming sewage and have all had major capacity increases recently. Between 2020 and 2025, Thames Water plans general capital maintenance projects and, specifically at the Hogsmill Sewage Treatment Works, biodiversity enhancements and a replacement to the combined heat and power plant.

**WP2 Strategic Approach to Other Forms of Waste**

(a) Planning permission for the intensification of existing sites to provide additional Construction and Demolition waste management capacity will be granted, subject to Policy WP3(b).

(b) New sites (either transfer or management) will not be permitted for Construction and Demolition waste, unless they are for compensatory provision (see Policy WP3).

(c) New sites (either transfer or management) will not be permitted for radioactive waste, agricultural waste and hazardous waste.

(d) Planning permission for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be granted, subject to the other policies in this South London Waste Plan plan and the relevant borough’s Development Plan.
WP3  The Safeguarding of Existing Waste Sites

Safeguarding

In order to preserve the existing capacity, the South London Waste Plan boroughs will safeguard all the existing waste sites, set out in Chapter 4, for waste uses and these will be shown on the boroughs’ Policies Map.

Intensification on Safeguarded Sites

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

Compensatory Provision

The Draft London Plan (July 2019) states that “waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used, where this is not available potential capacity of the site should be appropriately assessed” (paragraph 9.9.2). However, this approach may not effective for the South London Waste Plan area, where industrial land being in high demand. Firstly, it means that a borough outside the South London Waste Plan area can encourage a waste facility to relocate in the South London Waste Plan area, thereby effectively transferring its waste apportionment to the South London Waste Plan area and making the four boroughs a “waste dumping ground”. With the London Plan industrial land forecasts, the South London Waste Plan boroughs do not have the capacity to provide compensatory provision for other boroughs. Secondly, the compensatory provision of the maximum throughput achieved over the last five years is too prescriptive and, in the experience of the South London Waste Plan boroughs, is difficult to implement as there may be other factors as to why the maximum throughput cannot be achieved on a compensatory site, such as site limitations or new contract arrangements. The South London Waste Plan boroughs consider that the amount of compensatory provision for a lost waste site is best considered on a case-by-case basis.
WP3 Existing Waste Sites

Safeguarding
(a) The sites in Chapter 4 of this South London Waste Plan will be safeguarded for waste uses only.

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

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

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

Waste Hierarchy

x.x Planning Practice Guidance (Paragraph: 009 Reference ID: 28-009-20141016) states that “driving waste up the Waste Hierarchy is an integral part of the national waste management plan for England and national planning policy for waste. All local planning authorities must have regard to the Plan and national policy in preparing their Local Plans.” In other words, this entails ensuring waste that can be recycled is not used as fuel, ensuring waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of waste facility means waste operations cannot easily rise up the waste hierarchy be re-used is not recycled and, in the first place, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of waste facility means waste operations cannot easily rise up the waste hierarchy by intensification. The boroughs will attempt to adhere to national and regional guidance but will implement it flexibly on a case-by-case basis.
WP4 Sites for Compensatory Provision

Proposals for new waste sites to provide compensatory provision should:

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

As set out in Policy WP1, the South London Waste Plan expects no new sites for waste use to be permitted except where they are required for compensatory provision. The location of compensatory sites must be carefully considered.

Policy SI18 of the Draft London Plan (July 2019) suggests that Strategic Industrial Locations and Locally Significant Industrial Locations are suitable locations, while Appendix B of the National Planning Policy for Waste (October 2014) provides further information on locational criteria for waste treatment facilities.

Therefore, in accordance with the National Planning Policy for Waste, the Draft London Plan and this plan’s objectives:
WP5 Protecting and Enhancing Amenity

Waste facilities have the potential to generate a large number of amenity issues especially in an area as diverse as the plan area which includes urban, suburban and semi-rural built environments. The issues include effects on the built and historic environment, encroachment into open space, flood risk, harm to biodiversity, water quality and unacceptable emissions into the air (both from the plant itself and the traffic movements generated), unacceptable noise and vibration (both from the plant and traffic), litter and vermin and bird population increase.

Amenity impacts can be mitigated or prevented though conditions imposed by planning permissions, that are granted by planning authorities and environmental permits that are regulated by the Environment Agency. The National Planning Policy for Waste directs waste planning authorities to “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced”

The National Planning Policy Guidance (Paragraph: 050 Reference ID: 28-050-20141016) advises planning authorities that “before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body.” Consequently, in the consideration of waste facility applications, each borough will seek advice from the Environment Agency and other agencies as appropriate. In addition, developers are encouraged to contact the appropriate partner borough, the Environment Agency and Natural England prior to submission of an application to discuss all relevant matters and to engage in early public consultation on a proposal.

Developers are advised to pay particular attention to how the design of a facility can enhance the local environment and mitigate amenity issues. For instance, waste activities impacting on local amenity should be within a fully enclosed and covered building and the impact may be further limited by considering setting, hard and soft landscaping, height, bulk and massing, detailing, materials, lighting and boundary treatments.

Therefore, in accordance with the National Planning Policy for Waste and this plan’s objectives:
WP5 Protecting and Enhancing Amenity

(a) Developments for compensatory or intensified waste facilities 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.

(b) A waste facility should be within a fully enclosed covered building.

(c) Particular regard will be paid to the impact of the development in terms of:

(i) The Green Belt, Metropolitan Open Land, recreation land or similar;

(ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;

(iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;

(iv) Groundwater, surface water and watercourses;

(v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;

(vi) Noise and vibration from the plant and traffic generated;

(vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;

(vii) Odour, litter, vermin and birds; and,

(ix) The design of the waste facility, particularly:

- complementing or improving the character of an area;
- limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
- being of a scale, massing or height appropriate to the townscape or landscape;
- using good quality materials;
- minimising the requirement for exterior lighting; and,
- utilising high-quality boundary treatments.

The information in the schedule below will provide the basis for the assessment of the impact of a development.
**Schedule: Information which may be required for a planning application**

1. Type(s) of waste to be managed at the site, e.g. CD&E and C&I.

2. Estimated annual throughput of each type of waste materials and timescale of operations for the current proposals and the estimated maximum capacities for the site, if different.

3. Estimated capacity of the site

4. Method of working. The annual throughput per treatment method, e.g. Transfer, MRF, AD.

5. Markets to be served

6. Present use, conditions and ground levels of the site and its surroundings.

7. Site layout, means of access, the design and siting of buildings and fixed and mobile machinery to be used

8. Anticipated employment levels and hours of operation

9. Statement of Community Involvement

10. Preliminary assessment of BREEAM standard, undertaken by a BRE accredited assessor and commitment to submit a design stage certificate before construction can start on site and to undertake a post-construction review

11. Energy Assessment, including an assessment of energy demand and CO2 emissions

12. Assessment of the impact of the proposed development on the built and historic environment

13. Archaeological evaluation

14. Landscape assessment and landscaping proposals, including screening, landscaping works and boundary treatments

15. Tree Survey/ Arboricultural Report

16. Biodiversity Assessment would be required where proposals are likely to affect nature conservation areas such as a: National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Metropolitan, Borough or Local Importance for Nature Conservation, or Green Corridors.

17. Topographical Survey

18. Geological Assessment

19. Hydrological and hydrogeological assessment

20. Flood Risk Assessment

21. Site drainage details
22 Air Quality Impact Assessment, demonstrating the effects on air quality in the locality of a proposed site arising from the operation of the site and vehicles movements to and from it.

23 An assessment which identifies potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, and which identifies the mitigation measures to be used to minimise the effects of those nuisances.

24 Noise Impact Assessment

25 Sustainability Statement

26 Circular Economy Statement

27 Job creation details, including skills, training and apprentice opportunities

28 TV and Radio Reception Impact Assessment

29 Measures to prevent new or increased risk to aviation from the proposed development

30 Measures for protecting Public Rights of Way

31 Transport Assessment

32 Travel Plan

32 Route Management Strategy

33 Access Strategy

34 Delivery Servicing Plan/Freight Plan

35 Construction Logistics Plan

36 Highway safety measures

37 Design and Access Statement

38 Restoration, after care, after use and long-term management provision

39 An Environmental Impact Assessment may also be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

40 A Habitats Regulations Assessment, if the relevant borough and Natural England consider it may affect a European-designated site. European sites which may be affected are:

- The Richmond Park SAC;
- The Wimbledon Common SAC;
- The Mole Gap to Reigate Escarpment SAC; and,
- The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA).
WP6 Sustainable Design and Construction of Waste Facilities

“Designing Waste Facilities - A Guide to Modern Design in Waste” (DEFRA, 2008) states: “There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?” In addition, Policy S12 of the Draft London Plan (July 2019) provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change.

In terms of standards, the Building Research Establishment (BRE) has established a range of BREEAM schemes for rating the overall environmental performance of different types of non-residential buildings. Buildings are rated on a scale of ‘Pass,’ ‘Good,’ ‘Very Good,’ ‘Excellent’ or ‘Outstanding.’ However, there is no specific BREEAM scheme for waste facilities since there are many different technologies and building types. However, BRE advice is that it will be for developers to liaise with the BRE and BRE-accredited assessors in order to identify a suitable ‘bespoke’ BREEAM scheme to suit the particular characteristics of the proposed development. It is considered by the boroughs that many waste facilities should be able to meet the ‘Excellent’ standard. Similar standards should apply if the BREEAM is replaced by another environmental performance rating regime.

The reduction of carbon emissions is a key element of a BREEAM scheme and, in this respect, the Draft London Plan (July 2019) sets out that all major developments should be net zero carbon, including a minimum on-site reduction of at least 35% beyond building regulations 2013 (or equivalent).

Developers should also consider climate change adaptation measures in schemes. “Designing Waste Facilities - A Guide to Modern Design in Waste” also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise:

- **Odours.** With temperature increases, waste will need to be treated more quickly and unenclosed waste facilities (e.g. for composting facilities) will become particularly vulnerable to odour issues.

- **Heating, Cooling and Energy Use.** Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly. Storage and unoccupied areas may be better placed in the warmest areas of the facility.

- **Flood Readiness.** Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas. In addition, facilities should incorporate improvements to flood risk management in support of the objectives of the Catchment Flood Management Plan (CFMP) and the partner boroughs’ Strategic Flood Risk Assessments (SFRAs).

- **Soil Subsidence.** The wetting and drying effect on soil may cause subsidence. Developers may need to consider deeper foundations or piling. Root barriers may be required depending on surrounding vegetation.

- **Property Damage.** Higher wind speeds leading to structural damage, more intense rain leading to water infiltration and higher peak temperatures leading to blistering, warping and softening may affect the design of a building and the choice of materials.
In the construction phase of any development, consideration should be given to recycling Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. However, the boroughs are aware that this is not always feasible.

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

**WP6 Sustainable Construction of Waste Facilities**

(a) All proposals must achieve a sustainability rating of ‘Excellent’ under a bespoke BREEAM scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the ‘Excellent’ rating would make the proposal unviable. In addition, all proposals must comply with the South London Waste Plan and any other relevant policies of the appropriate borough’s Development Plan.

(b) Waste facilities will be required to:

(i) minimise on-site carbon dioxide emissions in accordance with the Draft London Plan Policy SI2;

(ii) be fully adapted and resilient to the future impacts of climate change in accordance with the Draft London Plan Policy GG6, particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;

(iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in support of the objectives of the All London Green Grid;

(iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;

(v) minimise waste and promote sustainable management of construction wastes onsite; and,

(vi) protect, manage and enhance local habitats and biodiversity.
WP7 The Benefits of Waste

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

Reuse, Refurbishment, Recycling and By-products

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

Energy from Waste

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

Job Creation and Social Value

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

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

WP7 The Benefits of Waste

(a) Planning applications for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.

(b) Planning applications for additional Energy from Waste facilities will not be supported.

(c) Planning applications for the intensification of sites should provide details of the job creation and social benefits that they bring, including skills, training and apprenticeship opportunities.
WP8 Planning Obligations

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

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

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

WP8 Planning Obligations

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

Site size: in hectares

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

(i) a waste management facility, which reuses, recycles or reprocesses waste and therefore its throughput can count towards the south London target;

(ii) a waste transfer facility, which processes or sorts waste for management elsewhere. In practice, however, most transfer stations do some management and, where this management capacity is known, it is counted towards the south London target;

(iii) a waste treatment facility is a general term covering both waste management and waste transfer facilities

Type of waste accepted: from the following types:

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

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

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

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

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

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

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

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

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

Issue to consider if there is a further application: The principal issues facing the site if it is redeveloped for additional or a different type of waste treatment. This is unlikely to be the case in most instances. Appendix 1 shows the sites which have been assessed as being able to intensify
C1 Able Waste Services, 42 Imperial Way, Croydon. CR0 4RR

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded
No

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

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

Site size (ha) 0.45
Type of facility Waste Transfer Station and Treatment
Type of waste Construction and Demolition

Maximum throughput tonnes per annum (tpa) 46,463
Licensed capacity (tpa) 74,999
Qualifying throughput (tpa) 43,268,000 (C&D)

Question C1 Do you agree this site should be safeguarded for waste uses?
A small, double-storey interwar workshop.
The site is located within a mixed use area. The site has residential properties on both sides and an industrial area/retail park opposite.

Planning Designations
Archaeological Priority Area

Currently Safeguarded
No

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

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

Question C2  Do you agree this site should be safeguarded for waste uses?
C3 Curley Skip Hire, Rear of 64 Northwood Road, Croydon. CR7 8HQ

The site is mainly open skip storage and hardstanding with some single-storey covered areas for sorting waste.
The site lies within a small industrial site located in a predominantly residential area.
The units are mainly double and triple-height inter-war sheds.

Planning Designations

Currently Safeguarded

Opportunity to increase waste managed

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

Issues to consider if there is a further application

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

Question C3

Do you agree this site should be safeguarded for waste uses?
**C4 Days Aggregates Purley Depot, Approach Road, Croydon. CR8 2AL**

**Site Description**
Open aggregates storing, treatment, recycling and storage facility with associated two-storey, mid-century office block and enclosed sheds.

The site lies adjacent to Purley rail station and is reasonably isolated from nearby

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

**Currently Safeguarded**
No

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

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

**Question C4** Do you agree this site should be safeguarded for waste uses?
C5 Factory Lane Waste Transfer Station, Factory Lane, Croydon. CR0 3RL

Site Description
A large triple-storey building surrounded by hardstanding.
The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycling centre and waste transfer station. Active gas holders lie to the north-west of the site and power lines are overhead.

Planning Designations
Archaeological Priority Area

Currently Safeguarded
Yes – Site reference in 2011 SLWP: 1

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

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

Question C5 Do you agree this site should be safeguarded for waste uses?
C6 Fishers Farm Civic Amenity Site, North Downs Road, Croydon. CR0 OLF

Not to Scale
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Site Description
Open local authority household reuse and recycling centre
Located on the edge of a residential area adjacent to farmland

Planning Designations
Archaeological Priority Area

Currently Safeguarded
Yes – Site Reference in SLWP 2011: 2

Opportunity to increase waste managed
No. There are no plans to intensify or upgrade operations

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

Question C6  Do you agree this site should be safeguarded for waste uses?
C7 Henry Woods Waste Management, Land adjacent to Unit 9, Mill Lane Trading Estate, Croydon. CR0 4AA

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded
No

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

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

Question C7 Do you agree this site should be safeguarded for waste uses?
C8 New Era Metals, 51 Imperial Way, Croydon. CR0 4RR

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded
No

Opportunity to increase waste managed
No. This site is achieving near its permitted capacity so it is unlikely that there is an opportunity to intensify the site in its current form.

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

Question C8  Do you agree this site should be safeguarded for waste uses?
**C9 Pear Tree Farm, Featherbed Lane, Croydon. CR0 9AA**

**Site Description**
Uncovered sorting facility, skip storage area along with vehicle storage and repair
Site is within the Green Belt surrounded by farmland

**Planning Designations**
Green Belt
Archaeological Priority Area

**Currently Safeguarded**
Yes – Site reference in SLWP 2011: 5

**Opportunity to increase waste managed**
No. This site is within the Green Belt and has been refused permission to intensify operations on several occasions on the basis of harm to the Green Belt and character and appearance of the area, Therefore, the site is not suitable for intensification

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

**Question C9**
Do you agree this site should be safeguarded for waste uses?
C10 Purley Oaks Civic Amenity Site, Brighton Road, Croydon. CR8 2BG

Site Description
Open local authority reuse and recycling centre. Located within a local centre with nearby residential development. Purley Oaks Depot (Site C4) is adjacent

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

Currently Safeguarded
Yes – Site reference in SLWP 2011: 4

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

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

Question C10 Do you agree this site should be safeguarded for waste uses?
C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon. CR5 2HT

Site Description
Large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear
The site lies within an industrial area with similar adjacent uses. To the east, there is a residential area with a buffer of green space and trees between.

Planning Designations
Strategic Industrial Location

Currently Safeguarded
Yes – Site reference in SLWP 2011: A

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

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

Question C11
Do you agree this site should be safeguarded for waste uses?
K1 Chessington Equestrian Centre, Clayton Road, Kingston. KT9 1NN

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

Planning Designations
Green Belt

Currently Safeguarded
No

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

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

Question K1 Do you agree this site should be safeguarded for waste uses?
**K2 Genuine Solutions Group, Solutions House, Unit 1A, Kingston. KT6 7LD**

Site Description: Two-storey office block fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear.

In an industrial area surrounded by similar large industrial sheds. Fronting onto Hook Rise South, beyond which is the Kingston bypass.

Planning Designations:
- Strategic Industrial Location
- Archaeological Priority Area

Currently Safeguarded: No

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

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

**Question K2** Do you agree this site should be safeguarded for waste uses?
**K3  Kingston Civic Amenity Site, Chapel Mill Road, off Villiers Road, Kingston. KT1 3GZ**

**Site Description**
Enclosed local authority reuse and recycling centre
The site lies within an industrial area which is surrounded by open space. The Kingston Waste Transfer Station is within the same site.

**Planning Designations**
Locally Significant Industrial Site
Area of Archaeological Significance

**Currently Safeguarded**
Yes. Site reference in SLWP 2011: 6

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

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

**Question K3**
Do you agree this site should be safeguarded for waste uses?
K4 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston. KT1 3GZ

Site Description
Double-height enclosed shed with hardstanding for vehicles
The site lies within an industrial area which is surrounded by open space. The Kingston Waste Transfer Station is within the same site.

Planning Designations
Locally Significant Industrial Site
Area of Archaeological Significance

Currently Safeguarded
No

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

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

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

Question K4 Do you agree this site should be safeguarded for waste uses?
M1  B&T@Work, Unit 5c, Wandle Way, Merton. CR4 4NA

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded
No

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

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

Question M1  Do you agree this site should be safeguarded for waste uses?
M2 European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton. CR4 4HX

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

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Zone

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

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

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

Question M2 Do you agree this site should be safeguarded for waste uses?
M3  Deadman Confidential, 35 Willow Lane, Merton, CR4 4NA

Site Description

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

Planning Designations

Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded

No

Opportunity to increase waste managed

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

Issues to consider if there is a further application

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

Question M3  Do you agree this site should be safeguarded for waste uses?
M4 Garth Road Civic Amenity Site, 66-69 Amenity Way, Garth Road, Merton. SM4 4AX

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

**Planning Designations**
Locally Significant Industrial Location

**Currently Safeguarded**
Yes. Site Reference in SLWP 2011: 9

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

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

**Question M4**
Do you agree this site should be safeguarded for waste uses?
M5  Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton. SM4 4AX

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

Planning Designations
Locally Significant Industrial Location

Currently Safeguarded
Yes. Site Reference in SLWP 2011: 9

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

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

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

Question M5  Do you agree this site should be safeguarded for waste uses?
M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA

Site Description
A large site comprising a double-height industrial shed with hardstanding for vehicles, skips and waste.
Located within the Willow Lane industrial estate and surrounded by similar industrial properties.
Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site.

Planning Designations
<table>
<thead>
<tr>
<th>Currently Safeguarded</th>
<th>Opportunity to increase waste managed</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No. The throughout per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form</td>
</tr>
</tbody>
</table>

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

Question M6 Do you agree this site should be safeguarded for waste uses?
M7 LMD Waste Management, Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton. CR4 4NA

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded
No

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

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

Question M7 Do you agree this site should be safeguarded for waste uses?
M8  M8: LMD Waste Management, 32 Willow Lane, Merton. CR4 4NA

Site Description

Double-height shed with attached single-storey offices
Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location opposite the site

Planning Designations

Strategic Industrial Location
Archaeological PriorityZone

Currently Safeguarded

No

Opportunity to increase waste managed

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

Issues to consider if there is a further application

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

Question M8  Do you agree this site should be safeguarded for waste uses?
**M9 Maguire Skips, Storage Yard, Wandle Way, Merton. CR4 4NB**

Mainly open hardstanding for skips and sorting. Double-height covered area.

Located within the Willow Lane industrial estate and surrounded by similar industrial properties, however, there are residential properties approximately 20 metres to the north of the site.

**Planning Designations**
- Strategic Industrial Location
- Archaeological Priority one

**Currently Safeguarded**
No

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

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

**Question M9** Do you agree this site should be safeguarded for waste uses?
M10  M10: Maguire Skips, 36 Weir Court, Merton. SW19 8UG

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

Planning Designations
Strategic Industrial Location
Archaeological Priority one

Currently Safeguarded
No

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

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

Question M10  Do you agree this site should be safeguarded for waste uses?
**M11  Morden Transfer Station, Amenity Way, Merton. SM4 4AX**

**Site Description**
Double-height industrial shed with hardstanding
The site lies within an industrial location surrounded by similar activities, and flats and a cemetery respectively along its north-eastern and north-western boundaries

**Planning Designations**
Locally Significant Industrial Location

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

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

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

**Question M11**
Do you agree this site should be safeguarded for waste uses?
**M12  NJB Recycling, 77 Weir Road, Merton. SW19 8UG**

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

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

**Currently Safeguarded**
No

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

**Issues to consider if there is a further application**
Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Minimising flood risk on- and off-site [if Flood Zone 2 or 3]
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the future Wandle Valley Regional Park
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Providing appropriate soft landscaping

**Question M12**
Do you agree this site should be safeguarded for waste uses?
**M13 One Waste Clearance, Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton. CR4 4NA**

**Site Description**
The facility is a fully enclosed industrial unit. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site.

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

**Currently Safeguarded**
No

**Opportunity to increase waste managed**
No. The throughput per hectare is based on the few weeks the facility has been operating, which is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

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

**Site Information**

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<thead>
<tr>
<th>Site size (ha)</th>
<th>0.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of facility</td>
<td>Transfer Station</td>
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<tr>
<td>Type of waste</td>
<td>Household, Commercial and Industrial (HCI), Construction and Demolition (C&amp;D)</td>
</tr>
<tr>
<td>Maximum throughput tonnes per annum (tpa)</td>
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<td>Licensed capacity (tpa)</td>
<td>75,000</td>
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<tr>
<td>Qualifying throughput (tpa)</td>
<td>13,453 (HCI), 4,547 (C&amp;D)</td>
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</table>

**Question M13**
Do you agree this site should be safeguarded for waste uses?
M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton. SW19 8UG

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Zone

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

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

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

Question M14 Do you agree this site should be safeguarded for waste uses?
M15 Riverside AD Facility, 43 Willow Lane, Merton. CR4 4NA

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

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

Planning Designations
- Strategic Industrial Location
- Archaeological Priority Zone

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

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

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

Question M15 Do you agree this site should be safeguarded for waste uses?
**M16  Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton. CR4 4NA**

**Site Description**

The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel. The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

**Planning Designations**

Strategic Industrial Location
Archaeological Priority Zone

**Currently Safeguarded**

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

**Opportunity to increase waste managed**

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

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

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

**Question M16** Do you agree this site should be safeguarded for waste uses?
M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton. CR4 8NA

Not to Scale
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Site Description
A large site comprising a double-height industrial shed with hardstanding for vehicles, hardstanding for skips and construction, demolition and excavation waste.

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

Planning Designations
Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded
No

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

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

Question M17
Do you agree this site should be safeguarded for waste uses?
### M18 Wandle Waste Management, Unit 7, Abbey industrial Estate, Willow Lane, Merton. CR4 4NA

**Site Description**

A double-height industrial shed

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

#### Planning Designations

<table>
<thead>
<tr>
<th>Currently Safeguarded</th>
<th>Opportunity to increase waste managed</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No. The throughput on this site is very small and it is unlikely that there is an opportunity to intensify operations at the site</td>
</tr>
</tbody>
</table>

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

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

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

#### Site Size (ha)

| 0.07 |

#### Type of facility

| Transfer Station |

#### Type of waste

| Hazardous, |

#### Maximum throughput tonnes per annum (tpa)

| 141 |

#### Licensed capacity (tpa)

| 24,999 |

#### Qualifying throughput (tpa)

| 0 |

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**Question M18**

Do you agree this site should be safeguarded for waste uses?
**S1 777 Recycling Centre, 154a Beddington Lane, Sutton. CR0 4TQ**

**Site Description**

The site comprises a large double-height and triple-height modern industrial sheds with hardstanding for skip storage and parking.

The site is part of a large strategic industrial location, backing on to tram lines to the rear.

**Planning Designations**

- Strategic Industrial Location
- Archaeological Priority Zone

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: 21

**Opportunity to increase waste managed**

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

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

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

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

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**Question S1** Do you agree this site should be safeguarded for waste uses?
S2 Beddington Farmlands Energy Recovery Facility, Beddington Waste Management Facility, 105 Beddington Lane, Sutton. CR0 4TD

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

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

Currently Safeguarded
No

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

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

Question S2 Do you agree this site should be safeguarded for waste uses?
S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton. CR0 4TD

Site Description
Modern, double-height industrial unit
The Beddington Lane industrial estate lies at the northern end of the Purley Way and Beddington Strategic Industrial Location. It largely comprises large, double-height industrial sheds with some ancillary office space

Planning Designations
Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded
No

Opportunity to increase waste managed
Yes. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput.

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

Question S3 Do you agree this site should be safeguarded for waste uses?
**S4 Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton. CR0 4TR**

![Map of Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton]

<table>
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<tr>
<th>Site size (ha)</th>
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<td>Type of facility</td>
<td>Transfer Station with Treatment</td>
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<tr>
<td>Type of waste</td>
<td>Household, Commercial and Industrial (HCI)</td>
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<tr>
<td>Maximum throughput tonnes per annum (tpa)</td>
<td>27,799</td>
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<tr>
<td>Licensed capacity (tpa)</td>
<td>75,000</td>
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<tr>
<td>Qualifying throughput (tpa)</td>
<td>21,113 (HCI)</td>
</tr>
</tbody>
</table>

**Site Description**

A double- and triple-height enclosed sheds with hardstanding for vehicles

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

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**Planning Designations**

- Strategic Industrial Location
- Archaeological Priority Area

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: 98

**Opportunity to increase waste managed**

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

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

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

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

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**Question S4**

Do you agree this site should be safeguarded for waste uses?
**S5  Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton. CR0 4YZ**

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

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

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

**Currently Safeguarded**
No

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

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

**Question S5**
Do you agree this site should be safeguarded for waste uses?
S6 Hydro Cleansing, Hill House, Beddington Farm Road, Sutton. CR0 4XB

Site Description
Fronted by two-storey, 1960s office block with facility to the rear
The site is located on Beddington Farm Road in the Beddington Strategic Industrial Location. It is adjacent to the Surrey Jaguar Centre and the Royal Mail Centre

Planning Designations
Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded
No

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

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

Question S6 Do you agree this site should be safeguarded for waste uses?
**S7 Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton. SM3 9QH**

**Site Description**
Open local authority reuse and recycling centre
The site is located in the north-west of the Kimpton Strategic Industrial Location. The site is opposite the Kimpton Linear Park, which is designated as a Metropolitan Green Chain, Metropolitan Open Land, Public Open Space and a Site of Importance for Nature Conservation.

**Planning Designations**
Strategic Industrial Location

**Currently Safeguarded**
Yes. Site Reference in 2011 SLWP: 3

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

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

**Question S7** Do you agree this site should be safeguarded for waste uses?
**S8  King Concrete, 124 Beddington Lane, Sutton. CR0 4YZ**

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

**Site Description**
Open site for concrete production and aggregates recovery

The site is part of the Beddington Strategic Industrial Location and is surrounded by similar uses.

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

**Currently Safeguarded**
No

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

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

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

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**Question S8**  Do you agree this site should be safeguarded for waste uses?
**S9 Premier Skip Hire, Unit 12, Sandiford Road, Sutton. SM3 9RD**

**Site Description**

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

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

**Planning Designations**

Strategic Industrial Location

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

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

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

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

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

**Question S9**

Do you agree this site should be safeguarded for waste uses?
S10  Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton. CR0 4TR

Double-height enclosed sheds with hardstanding for skips
The site lies within a large industrial estate (the Beddington Strategic industrial Location) surrounded by similar industrial properties

Planning Designations: Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded: No

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

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

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

Waste paper and waste cardboard recovery and transfer facility comprising a weighbridge, portacabin offices, parking and areas for sorting and baling.

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

**Planning Designations**

Strategic Industrial Location
Archaeological Priority Area

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

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

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

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

**Question S11**

Do you agree this site should be safeguarded for waste uses?
S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton. CR0 4TH

Site Description
The site is currently vacant but the proposal is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring.

The site occupies the land to the west of Beddington Lane. It is surrounded by the proposed Wandle Valley Regional Park, Beddington Lane and industrial units to the north.

Planning Designations
Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded
Yes. Site Reference in 2011 SLWP: 17

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

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

Question S12
Do you agree this site should be safeguarded for waste uses?
# Appendix 1  Sites Counting Towards the Apportionment and C&D Target

<table>
<thead>
<tr>
<th>Ref</th>
<th>Name</th>
<th>Household/C&amp;I</th>
<th>C&amp;D</th>
<th>Potential for Intensification</th>
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<tbody>
<tr>
<td>C1</td>
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## Appendix 2  Sites and Areas from the 2011 South London Waste Plan

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<td>Viridor Recycling and Composting Centre</td>
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<td>Five Star Japanese Autos</td>
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<td>Sloane Demolition</td>
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<td>Stubbs Mead Depot</td>
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<td>Vertal (now known as Riverside Bio)</td>
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</table>
Question Appendix 1  Do you agree with the approach taken to the identified sites from the 2011 South London Waste Plan?

Question Other  Is there anything that any other aspect of waste planning in South London that the plan ought to contain?  
(To cover Regulation 18)
Appendix 3  Glossary

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

Circular Economy
Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: Design out waste and pollution; Keep products and materials in use; Regenerate natural systems (Ellen MacArthur Foundation).

Commercial Waste
Controlled waste arising from trade premises

Construction, Demolition & Excavation Waste
Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

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

Energy from Waste
The conversion of waste into a useable form of energy, often heat or electricity

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

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

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

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

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

HIC
Household, Industrial and Commercial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HIC is used to describe the throughput where a facility manages both waste streams
Household Waste
Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and “bring sites”

Incineration
The controlled burning of waste. Energy may also be recovered in the form of heat (see Energy from Waste)

Industrial Waste
Waste from a factory or industrial process

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

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

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

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

Local Authority Collected Waste (LACW)
Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials

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

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

LLW – low level radioactive waste
Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

Materials Recycling Facility (MRF)
A facility for sorting and packing recyclable waste

Mechanical Biological Treatment (MBT)
The treatment of residual waste using a combination of mechanical separation and biological treatment

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

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

Organic Waste
Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste
Open Window Composting
A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue.

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

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

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

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

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

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

Waste Electrical and Electronic Equipment (WEEE)
Sites for the depollution, disassembly, shredding, recovery or preparation for disposal, and any other operation carried out for the recovery or disposal of Waste Electrical and Electronic Equipment.

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

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

Waste Minimisation / Reduction
The most desirable way of managing waste, by avoiding the production of waste in the first place.

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

Waste Regulation Authority
The Environment Agency has responsibility for authorising waste management licenses for disposal facilities, and for monitoring sites.

Waste Transfer Station
A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal.